LONDON BOROUGH OF CROYDON

| REPORT: | CABINET |
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| DATE OF DECISION | 27th March 2024 |
| REPORT TITLE: | Update on the Housing Transformation Programme |
| CORPORATE DIRECTOR / DIRECTOR: | Susmita Sen, Corporate Director of Housing |
| LEAD OFFICER: | Lara Ashley, Housing Transformation Lead |
| LEAD MEMBER: | Councillor Lynne Hale, Cabinet Member for Homes |
| Key Decision? | No |
| CONTAINS EXEMPT INFORMATION? | No |
| WARDS AFFECTED: | All |

1 SUMMARY OF REPORT

- **1.1** This report provides an update on the Housing Transformation Programme following the last update to Cabinet in October 2023.
- **1.2** Work continues to progress well across the Housing Transformation Programme, with several projects now completed and others being added as required by the service.
- 1.3 This report re-iterates the workstreams as agreed under the Housing Transformation Programme and details the progress to date on all of the live projects, according to each workstream.

2 RECOMMENDATIONS

For the reasons set out in the report [and its appendices], the Executive Mayor in Cabinet is recommended to:

2.1 Note the progress since October 2023 on the Housing Transformation Programme which includes the Voluntary Undertaken given to and accepted by the Regulator of Social Housing ("the Regulator") which is attached at Appendix A.

3 REASONS FOR RECOMMENDATIONS

- **3.1** To provide the Executive Mayor and Cabinet with oversight of the Council's Housing Transformation Programme.
- **3.2** To improve governance and transparency around decision-making.
- 3.3 To provide public information regarding transformation of the authority's housing related activities and practices to support meeting its best value duty.

4 BACKGROUND AND DETAILS

- 4.1 Members will be aware that in May 2021, following a self-referral to the Regulator of Social Housing (RSH), the London Borough of Croydon (LBC) was served with a regulatory notice for being in breach of both the Tenant Involvement and Empowerment Standard and the Home Standard and as a consequence of this breach, there was actual and potential serious detriment to the Council's tenants.
- 4.2 The extremely poor living conditions suffered by residents at Regina Road in South Norwood was highlighted by the media and this led to the self-referral and subsequent regulatory notice.
- 4.3 It became clear in the subsequent investigation of this case that there was a serious broader issue of widespread disregard for the priorities and needs of residents as well as a long-term lack of investment in the Council's housing stock.
- 4.4 In December 2022, Cabinet approved a Housing Transformation Programme to work closely with residents to transform the services provided by the Housing Directorate and return to compliance with the Regulator's Consumer Standards.
- 4.5 There have been a number of achievements in the programme since Cabinet was last updated in October 2023.
 - Our Voluntary Undertaking reported initially to members in September 2023, has been submitted to the Regulator of Social Housing and been accepted. A copy is attached for members' information and endorsement. This sets out our path to compliance and the steps we have committed to take to ensure that we provide better services for our residents. This is being monitored monthly by the Regulator and internally within the Council under the transformation governance process.
 - Development of a new Housing Strategy 2023- 2028: The Housing Strategy and its accompanying delivery plan were passed at Cabinet on 6th December and approved by Full Council on 13th December 2023.
 - Changes to Leadership Team: We have recruited to two of the five permanent Director posts. These are for the Director of Housing – Neighbourhood Management and the Director of Housing - Homelessness and Temporary Accommodation. We have also recruited an interim Director of Housing – Compliance, Asset Management and Repairs.

- KPI Dashboard The KPI Dashboard is now being monitored at the Housing Improvement Board and DMT.
- NEC Migration: The NEC Housing Management IT system was successfully implemented in June 2023 and issues that arose since go live continue to be addressed. The first system upgrade was completed in January 2024. The development phase will be released in stages over the next 12-months.
- Regina Road Phase 1: design of an estimated 86 units is progressing. A bid for GLA funding has been accepted at approximately 50% build cost. Project Architects were appointed in December 2023.
- Compliance plan for Building Safety Act All high-risk buildings were registered to deadline with the Building Safety Regulator in October 2023.
- Repairs Contact Centre: Recruitment has taken place to stabilise the workforce and to raise the standards of the service. New starters join the Contact Centre in April 2024.
- Homelessness Prevention and Rough Sleeping Strategy: The consultation is complete and this Strategy will be going to April Cabinet.

These are in addition to what has already been achieved since the programme was developed in 2022. In particular:

- Vision and Mission for the directorate co-designed with residents
- Residents Charter co-designed with residents
- HRA funding and recharging review completed
- HRA Business Plan
- Voids lettable co-designed with residents
- NEC migration
- Procurement of three new Repairs Contractors
- In-sourcing of a Housing Repairs Contact Centre
- Rent-setting consultation programme
- Estate Inspection Programme

5 PROGRESS UPDATE

The progress to date for each workstream is detailed below. These are in addition to regular updates to the Housing Improvement Board, Regulator, Executive Mayor and Deputy Executive Mayor and this and other reports to Cabinet provide additional programme level updates. RAG-ratings have been provided for each of the projects in the left-hand column using the following key:

| Project is not on track | | |
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| imme | diate | |
| interv | ention to | plan to |
| return | to co | mmitted |
| doodl | inoc | |

Project is not on track but does have a plan to ensure it delivers the agreed outcomes by committed deadlines. Project is on track to deliver the agreed outcomes by committed deadlines.

Project is complete and will no longer be reported on. Projects are constantly progressing and may change in RAG status from the point of report submission to Cabinet meeting and members will be updated if that is the case. Where any deadlines/commitments change through the formal change control processes then it is against the new deadlines/commitments that the RAG status is provided.

Workstream 1: Vision, Direction & Transformation Plan for Housing Directorate

| 1.3 Housing Strategy | The Housing Strategy and its accompanying delivery plan were recommended by Cabinet for adoption by Full Council on 6th December and were approved by Full Council on 13th December. This strategy builds on our work to ensure residents are at the heart of what we do and strengthen the relationships with our partners. It is a non-statutory document, but it is required by some services to access government support and highlights to This is now complete and will not be |
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| | reported on in future. |
| 1.5 High level restructure and recruitment | We have recruited to two of the five permanent Director posts. These are the Director of Housing Management and the Director of Housing - Homelessness and Temporary Accommodation. We have also recruited an interim Director of Housing – Compliance, Asset Management and Repairs. Recruitment is ongoing for the remaining permanent Director posts. |

Workstream 2: Governance & Information Management

| 2.1 Revised | Our KPI dashboard has been agreed with the Housing Improvement |
|-----------------------|---|
| Performance | Board. This framework sets out clear measures of performance for service |
| Framework and | areas and enable appropriate objective setting for staff, projects and |
| Business Intelligence | initiatives, with a clear focus on customer services. |
| 2.6 Website Update | Work is ongoing with CDS and our contractors to ensure information is reviewed, helpful and provides guidance to our residents on how they can support themselves with everyday easy to resolve matters. This will include videos that customers can watch to independently carry out maintenance tasks at home. Wider review across all of Housing to also to be carried out in upcoming months. |

Workstream 3: Customer Excellence

| 3.2 Resident | The Resident Involvement Strategy was drafted between July 2023 and |
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| Engagement Strategy | November 2023. Residents and staff residents and staff were involved in a |
| | number of design workshops. |
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| | The group (Design and Discovery) are now revising all the current formal groups, terms roles and responsibilities as well as designing the strategy framework engagement structure. |
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| | The initial target for February Cabinet was changed to allow for additional consultation. The strategy is planned to now come to Cabinet in the summer (subject to agenda capacity) and Full Council shortly after. |
| 3.4 Customer Information review | Data gaps in NEC have been identified and the tenancy audit form has been updated in order to better capture tenant information. A revised occupancy check form is now in use. A review of all tenancy information on the website is nearing completion – design of new information channels is in progress. The contact centre telephone script is being updated to help us capture more customer information. |
| 3.5 Customer Journey Review | The project seeks to co-review our residents' pathways through housing services to create and inform a new operating model and deliver a fit-for-purpose website. |
| | Tenancy Services Subject Matter Experts (SMEs) have reviewed a range of webpages and Leasehold SMEs have re-reviewed the Leasehold pages. Once these reviews have been completed, we will engage customers to access and test the live web pages, ensuring that they are fit for purpose and make any further amendments to these as required. |
| 3.7 Customer Service Training | The discovery stage has now been completed for the Customer Care programme and we are now in the design stage. A pilot is scheduled for March 2024. |
| 3.8 Customer Learning & review of process | In January 2024 we updated our complaints policy and compensation guide to ensure it meets the standards set by the Housing Ombudsman. We also completed a self-assessment against the Complaint Handling code and published our findings. |
| | We set up action plans in December 2023 to clear a backlog of complaints and member enquiries with Housing Needs and Repairs. To support with the delivery of this plan, we recruited additional staff and at the time of writing have since closed over 500 complaints and over 500 member enquiries. We are continuing to work through the backlogs with our teams. |
| 3.9 "Stop Social Housing Stigma" Campaign | Stop Social Housing held a presentation in November to highlight the work that has been done in 2023 on the campaign. Work has been ongoing with Universities of Durham, Sheffield, TPAS and the CIH since last year. |
| | Stop Social Housing Stigma (SSH) have applied for funding from DHLUC to develop a sector wide pledge to tenants and the development of a toolkit 'which supports local partnerships of tenants, landlords, their partners, contractors and suppliers, to address social housing stigma locally'. |
| | SSH are seeking landlords to support them in developing the pledge, toolkit and self-assessment. Croydon have volunteered to become one of the landlords who will pilot this and are awaiting a response from SSH. |

| 3.10 Review of Consumer Standards | A review of Consumer Standards and a gap analysis against these standards has been completed. Updates to projects have been actioned. We will review them against the finalised standards agreed at the end of February 2024. |
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| 3.12 Know our Neighbourhoods programme & Estate Inspections | Since June 2023, we have been working with Sustainable Communities to develop a ground maintenance service-level agreement to improve the delivery of services to residents. This was signed off in November 2023. |
| | Successful Go Live took place with 146 Estate Walkabout / inspection forms completed by Operations Managers and Tenancy Officers using the Photobook app. In addition, work is progressing with sustainable communities' teams to promote messages around food waste and appropriate recycling assets. |
| 3.16 NEC Post Go- Live Product Development | The NEC Housing system was implemented in mid-2023 and issues that arose since go live have largely been addressed. The second phase of NEC Housing is in the final stages of planning and resourcing. |
| | The development phase will be released in stages over the next 12-months. |

Workstream 4: Long-term Homes & Neighbourhood Planning

| 4.1 Resolution programme for Regina Road. | GLA Deputy Mayor for Housing visited in November with the Executive Mayor and Deputy Executive Mayor, and a bid for GLA funding was submitted and accepted at approximately 50% build cost. GLA advise that grant will be dependent upon achieving Planning Permission for an estimated 225 homes in context of outline Masterplan for Regina Road and having a single main contractor for the build. Architects appointed and contract to be signed imminently. |
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| 4.2 Resolution programme for LPS blocks | In person resident engagement meetings were held with all 15 LPS blocks between Summer and Winter 2023. We have confirmed the summary findings back to residents and progressed actions raised. Once we complete the initial resident engagement meeting with all 46 High Risk Buildings in Spring 2024, we will then commence the 2 nd round of resident engagement meetings, starting with the residents in the LPS blocks. A proposal for the structural assessment on all LPS blocks has been prepared. An update paper on LPS will be coming to Cabinet in Spring 2024. Initial responses and arrangements are in place against all the requirements. Our information and arrangements are being developed over the coming months. |
| 4.3 Development of Asset Management Strategy | The Strategy will detail the long-term plan for the management of Council stock (as part of a five-year rolling programme) and link in with clear financial planning. Online and face to face resident engagement has taken place to support the development of the strategy which is proposed for |

| | May Cabinet. 33% of our stock condition surveys were delivered by December 2023 and we are on track to deliver 40% by the end of the current financial year. |
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| 4.4 Estates and Improvement restructure | The purpose of this restructure is to redesign the way in which the Housing Assets are managed, repaired, invested in and meet all applicable compliance standards. Our new Interim Director of Asset Management and Repairs is reviewing the restructure and design conversations are ongoing. |

Workstream 5: Asset Compliance

| 5.1 Compliance plan | Initial responses and arrangements are in place against all the |
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| for Fire Safety Act | requirements. Our information and arrangements are being developed |
| 2021 | over the coming months, to meet all the requirements. Examples of this |
| | are improving building floor and block drawing plans, resending safety |
| | information to residents, collecting more detailed external wall information |
| | through surveys required under the Building Safety Act. (Oct 23) |
| | |
| 5.2 Compliance plan | All High-Risk Buildings were registered, within the deadline, with the |
| for Building Safety Act | Building Safety Regulator in October 2023. |
| | We are working hard with the procurement team to finaline requirements |
| | We are working hard with the procurement team to finalise requirements |
| | for the procurement of a broad range of consultancy support to assist with |
| | meeting the requirements of the Building Safety Act. This includes fire & |
| | structural engineering, building surveying, safety case and specialist |
| | contractors to support these surveys such as asbestos removal and |
| | concrete specialist. These surveys will be carried out over several years. |
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Workstream 6: Maintaining our Homes

| 6.1 Repairs reprocurement / mobilisation | This project has now been completed. It is now being reported on as part of Phase 2 of the NEC project. |
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| 6.2 Repairs Contact | LBC's in-house repairs contact centre went live on the 1st of August 2023. |
| Centre mobilisation | Stabilisation of this service is reported in project 6.9. |
| 6.3 Repairs | This project aims to ensure an effective, motivated and skilled workforce |
| restructure and | which can manage the new repairs contracts and deliver our capital and |
| behaviour change | asset management programmes. |
| programme | The design of the restructure is being finalised. Our new Interim Director of Asset Management and Repairs has been reviewing operating activities to feed into the new structure. We are also mapping new ways of working to ensure governance is well managed and have introduced the new competency model. |

| 6.4 Voids transformation | Following stakeholder consultation of the Void Policy by attendees from the weekly voids meeting group, it has since passed review from subject matter experts and the Legal team. The Policy is now awaiting review from residents. The revised Voids Lettable Standards have been agreed with resident consultation. Following agreement with energy suppliers, new tenants will be supplied with a small sum of credit on their meter following their sign up to properties. This will enable maintenance works to begin immediately once the property becomes void as power will be restored in an empty property without unnecessary delays. |
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| 6.5 Disrepair transformation | A Disrepair Paper was presented to the Corporate Management Team on 31st January regarding the issues around disrepair, the work being undertaken to improve the service and to minimise new claims. A plan has been agreed to increase the capacity of the Disrepair Team and the term contractors to clear the backlog of claims by April 2025, with the necessary budget approved and the appropriate monitoring and reporting in place. |
| 6.6 Review of policies, procedures, business processes and customer journeys | Over 50 Housing Policies have been identified that will require development, 29 have been drafted and are under review with subject matter experts and the Legal team. These included Tenancy Management policy, Void Management Policy, the Decant Policy, and six important Health and Safety Policies: Asbestos Management, Fire Safety, Electrical Safety, Gas Safety, Lift Safety, and Water Hygiene. 23 key policies that impact service delivery have been identified and are being reviewed by residents that have volunteered to support our policy development. |
| 6.7 Review of Capital Delivery Contract | An independent company has been engaged to undertake this review of our Capital Delivery Contract with the aim to analyse the customer journey, customer satisfaction and areas for service improvement. Feedback sessions were held on 1st Feb with tenants and leaseholders who have received works to their homes, properties or estates in the last 12 months to understand the resident experience of the contractor's service. This review is now complete. |
| 6.8 Targeted Approach to Damp and Mould | Capacity for dealing with damp and mould has been increased by ensuring the main contractors have onboarded specialist teams to ensure mould is treated as an emergency which allows time for each case to be reviewed and addressed within our target times. New template agreed with contractors to return consistent data to build accurate picture of damp and mould within Croydon housing stock. A revised Void Lettable Standard specification has developed to ensure all presence of damp and mould is addressed at this stage. |
| 6.9 Repairs Contact Centre Stabilisation | Previously the contact centre data was managed by Axis and no data or trends were handed over at the end of the Axis contract which made it hard to forecast call volumes. These volumes have been a lot higher than expected, causing some pressure to the team. The contact centre has also |

| | experienced challenges with the new system, staff turnover and training gaps. All these issues have been identified and are being managed by the contact centre manager with support from other teams. Recruitment has taken place to stabilise the workforce and to raise the standards of the service. New starters from this process will join the Contact Centre in April 2024. |
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| 6.10 Asset Register and Management review | This project is designed with the objective of reviewing and setting out the data governance of asset information and ownership throughout the housing directorate and the wider organisation. Project is new. |

Workstream 7: People & Organisational Development

| 7.2 Enabling high performing teams and setting behavioural expectations | Competency model used for recruitment of posts and will be integrated into Appraisals for 2024/25. Change management sessions are being designed to support the changes within the directorate and establish standards in the way we work. This plan will include team building sessions, standard setting sessions; engagement activities; training needs analysis, housing induction and work towards meeting the Competence Standard. |
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| 7.6 Talent acquisition: Apprenticeship/ Graduate Programme/EVP | Talent acquisition is ongoing. We are part of the apprentice programme and Graduate scheme. We are also collaborating with Croydon Works on engaging local residents with routes back to employment. |

Workstream 8: Managing our Housing Needs

| 8.1 Housing Needs restructuring | Following restructure of the Housing Needs Service recruitment to the new roles commenced in December. Delivery of the Change Management and Staff Development Programme is on track. This includes a training programme, team building events and increased engagement sessions. |
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| 8.2 Supported Housing Review | The Council has now appointed Homeless Link, a national homeless charity, to carry out a full review of the existing supporting housing pathway. This will also include additional floating support providers. The pathway currently provides supported accommodation for single vulnerable homeless adults, care leavers, mental health hospital discharges and homeless adults with learning disabilities. The review and recommendations (including a new tender) will be carried out throughout 2024/2025 with a new pathway commissioned to start from the 01 April 2025. |

8.3 DPS – Procurement of contracts

Software has now been purchased for the Dynamic Purchasing System (DPS). A strategy report, Nightly Paid Accommodation Agreement, and a review of the draft specification is now ongoing.

The project is being implemented in two phases. In the first phase, which is in progress, all existing providers will be onboarded onto the system, and this will be completed by the 31 March 2024. Phase 2 allows new providers to join the framework, and this will go live in first quarter of 2024/25 financial year.

8.4 Homelessness Prevention and Rough Sleeping Strategy

The Homelessness Prevention and Rough Sleeping Strategy has been produced following extensive consultation. This has involved meetings with a range of partners such as the Family Justice Centre, Evolve Housing, Crisis, SLAM, St Mungo's and Nightwatch as well as online sessions with residents. In addition, there are over 300 customer responses to recent surveys carried out in homelessness and the housing strategy which will provide input into the final strategy.

Initial feedback from external partners (both statutory & voluntary) shows a strong desire to work in closer partnership with the council to support homeless residents. This includes work to both support the prevention of homelessness and residents if they have been rehoused and need extra help in their new tenancy (which could include daily living skills and access to employment & training).

The strategy includes workstreams to enable these pieces of work and includes the need for strong partnership delivery and resident involvement. The strategy is on track for April Cabinet.

8.8 Housing Association Liaison Recharges & Nominations

This project intends to improve governance of all relevant contracts and nomination agreements to maximise the properties the Council can use to move people out of temporary accommodation.

Currently 60 housing associations have properties in Croydon. The largest has a total social stock of 3708 units. Four other housing associations have stock of over 1000 units. Overall, there are 29,852 social units in Croydon with 24,092 being general needs self-contained units. Croydon owned stock represents 45% of this total stock (13,454).

The recharges relate to the use of Home Connections which is the councils online bidding system for social housing. Updated milestones and a recovery action plan are in place.

8.11 Temporary Accommodation Occupancy Checks

This project has been set up to visit all current residents in temporary accommodation to confirm occupancy, review the household composition and confirm the standard of the temporary accommodation unit.

To date 1785 inspections have been carried out and access has been gained to 1231 units. This is out of a total of approximately 3300 properties.

The project was due to end by the 31st of March 2024 however will need to be extended to the end of June to allow for access issues to be resolved.

5.3 New Projects Commencing shortly

- **5.4** There are several new projects which are developing and will form part of the next update to Cabinet. These include:
 - Review of housing provision for young people
 - Collaborative Corporate Parenting project
 - Adults & Housing stock review and collaborative pathways
 - Temporary & Emergency Accommodation provider review & acquisitions

5.5 Risks and challenges

- Highlight reports are produced monthly and report on the risks and issues for the delivery of the Housing Transformation Programme at a project level. These risks, issues, and mitigations are reviewed each month at meetings of the Housing Transformation Steering Board. Any risks or issues with implications for the entire Council are elevated to the attention of the Corporate Management Team by adding them to the corporate risk log (JCAD).
- There are several challenges faced by the Council in delivering the Housing Transformation Programme. These include challenges which stem from legislative changes introduced by the Government in the past three years as well as upcoming proposed changes, which impact or could impact various aspects of social housing, housing needs, and homelessness:
 - Fire Safety Act 2021
 - Building Safety Act 2022
 - Social Housing Regulation Act 2023
 - Renters (Reform) Bill
 - Supported Housing (Regulatory Oversight) Act 2023
- 5.8 In addition to the new legislation, the Regulator of Social Housing and the Department for Levelling Up, Housing & Local Government have recently revised the Consumer Standards and Decent Homes Standard. The standards that social homes and our landlord services must meet are therefore due to be revised. A gap analysis has been undertaken on the proposed consumer standards to identify any risks. This will now be reviewed in light of the final consumer standards published on the 29th February 2024
- 5.9 The economic circumstances faced by the Council pose additional challenges for the delivery of the Housing Transformation Programme. Escalating costs related to building materials and labour, driven by inflation, have necessitated careful budgetary considerations for specific projects. Furthermore, the ongoing cost-of-living challenges have intensified the demands on the Council's homelessness services, requiring a

delicate balance between the reform to the Housing Needs service and sustaining essential front-line services.

6 CONTRIBUTION TO COUNCIL PRIORITIES

6.1 This programme, alongside the development of the Housing Strategy 2023-2028, is key to ensuring the Council delivers against the Mayor's priorities to "Invest in council homes to drive up standards and develop a responsive and effective housing service" and "Develop our workforce to deliver in a manner that respects the diversity of our communities."

7 IMPLICATIONS

7.1 FINANCIAL IMPLICATIONS

- 7.1.1 The delivery of the Housing Transformation Programme required an upfront investment to ensure we transform the directorate to create services that meet the needs of residents. The Finance, Legal & Environment enabler is providing the necessary financial governance of the projects within the Housing Transformation Programme as they are developed, including ensuring the projects are financially viable, deliver value for-money and are managed to budget.
- **7.1.2** As the projects are both HRA and GF the financial costs incurred in year will be funded using HRA reserves to ensure this investment delivers the right plan for the community, and the GF Transformation Funding.
- **7.1.3** The draft HRA budget for financial year 2023-2024 has been updated to reflect known budgetary requirements. Work is underway on the 2024-25 HRA Business Plan and budget setting. The budget will be reviewed to reflect the needs that have been identified in each of the work streams and monitored against the budget set.
- **7.1.4** Comments approved by Orlagh Guarnori on behalf of the Director of Finance. (Date 12/09/2023)

7.2 LEGAL IMPLICATIONS

- 7.2.1 The Regulator for Social Housing is established under Section 80A of the Housing and Regeneration Act 2008 ("the 2008 Act") as amended, and has regulatory oversight in respect of social housing landlords, including local authorities. The regulator sets consumer standards and may, as is the case with Croydon, take action if these standards are breached and there is a significant risk of serious detriment to tenants or potential tenants.
- **7.2.2** The giving of voluntary undertakings is governed by section 125 of the 2008 Act and where the regulator accepts a voluntary undertaking from a social housing provided, the

regulator will have regard to this undertaking in determining actions it considers are needed under its regulatory and enforcement powers (Chapter 6 and 7 of Part 2 of the 2008 Act) and may additionally take into account any failure of the Council to honour the voluntary undertaking in making determinations about current or future enforcement or regulatory action against the Council.

- 7.2.3 The legal basis for the Housing Transformation Programme is the Council's general power of management of its housing stock in Section 21 of the Housing Act 1985. In addition, the Council has legal obligations in relation to how it maintains and repairs its housing under Sections 9A and 11 of the Landlord and Tenant Act 1985, Section 4 of the Defective Premises Act 1972 ("DPA"), under common law nuisance and negligence principles, and under express or implied terms of the tenancies it has granted.
- **7.2.4** Separately, there are statutory requirements on the Council to consult with tenants where they are likely to be substantially affected by changes in housing management practice or policy, and the Council must ensure that it meets these requirements as part of the development and delivery of the Housing Transformation Programme.
- **7.2.5** There is also a range of legislation which has been introduced in the past three years, the implementation of which impacts on various aspects of the council's legal responsibilities in relation to the provision and maintenance of social housing, housing needs, and homelessness. In particular:
 - 7.2.5.1 The Fire Safety Act 2021 and the Fire Safety (England) Regulations 2022 have been introduced to meet the recommendations arising from the Grenfell Tower Inquiry and impose significant new legal requirements upon the 'responsible person' (i.e., those who own or have control over premises) for relevant buildings containing two or more domestic premises. This will require a programme of fire risk assessments to meet the new compliance regime and timetable.
 - 7.2.5.2 The Building Safety Act 2022 is intended to improve the design, construction and management of high-rise buildings introducing greater accountability and responsibility for fire and structural safety issues throughout the lifecycle of buildings in scope of the new regulatory regime for building safety. One of the significant elements of the Building Safety Act 2022 has been its amendments to the Defective Premises Act 1972 ("DPA") referenced above. Previously the limitation period to bring a claim under the DPA was 6 years from the date of completion of the works. This limitation period has now been extended to 30 years retrospectively for claims accruing before 28 June 2022 and to 15 years for claims accruing after 28 June 2022. Given these extended limitation periods, there is likely to be an increase in claims referencing the DPA in relation to dwellings where other methods of recourse are no longer available.
 - 7.2.5.3 The Social Housing Regulation Act 2023 amends Part 2 of the Housing and Regeneration Act 2008 and enhances the core framework for the regulation of social housing. Key measures will require the Council to investigate hazards and fix repairs including damp and mould in Council properties within strict new time limits or rehouse residents where a home cannot be made safe. The new rules will form part of the tenancy agreement, so residents can hold landlords to account if they fail to comply. Also, the Regulator will have new and stronger powers to 'proactively assess' social landlords such as the

Council against the consumer standards, enter properties with 48 hours' notice and make emergency repairs at the landlord's expense. Housing Managers will be required to have an 'appropriate level housing management qualification' regulated by Ofqual.

- **7.2.5.4** The Supported Housing (Regulatory Oversight) Act 2023 impacts the provision of supported housing and sets a new framework of systems for the supported housing and older person's housing sector.
- **7.2.5.5** Finally, the Renters Reform Bill is currently in the initial stages of consideration in parliament, having recently entered the report stage in the House of Commons. In its current form, it proposes to abolish 'no fault' evictions empowering renters to challenge the landlords who provide poor quality housing without the worry of a 'no fault' eviction.
- **7.2.6** Under the provisions of section 3 of the Local Government Act 1999 the Council is required, as a best value authority to 'make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness'. The best value duty applies to all functions of the Council including delivery of its statutory housing services.
- **7.2.7** Under Section 15 of the 1999 Act, the Secretary of State has the powers to intervene if satisfied that the Council is failing to meet its best value duty. This includes the power to issue directions that the function of the authority be exercised by the Secretary of State, or a person nominated by him for a specified period.
- 7.2.8 On 20th July 2023, the Secretary of State for Levelling Up, Housing and Communities ("the SoS") issued Directions under Section 15(5) of the1999 Act to the Council on the basis that the Council was failing to comply with its Best Value Duty setting out actions to be taken by the Council to comply the duty. The SoS Directions require the Council, amongst other things, 'to continue to improve the capacity and capability of the authority's housing service.'
- 7.2.9 On 6 October 2023, The Improvement and Assurance Panel agreed an intervention Exit Strategy which describes the tangible improvements they expect the Council to make by March 2025. One of the key elements of the Exit Strategy links to the Housing Transformation Programme and its delivery and this report provides details to Members on how progress is being made and monitored to ensure that the requirements of the Exit Strategy are supported and met.

Comments approved by the Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (15/03/2024)

7.3 EQUALITIES IMPLICATIONS

7.3.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in Section 149 of the Equality Act 2010. The Council must, in the performance of its functions, have due regard to its duty to:

Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.

Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- **7.3.2** Access to safe and secure housing has a great bearing on the wellbeing of our residents and has a significant impact on equalities outcomes. As such, regard for the PSED will be key to the Housing Transformation Programme.
- 7.3.3 Overall, transforming the Housing service is likely to have a positive impact on equalities outcomes. However, as the Housing Transformation Programme is developed, specific Equality Impact Assessments will need to be provided at a project level. The officers responsible for the development and delivery of these projects or workstreams will need to ensure that the EQIAs produced accurately assess the potential impact of any proposed changes on protected groups, and the aims of the PSED, recognising that this can be both positive or negative in nature. All EQIAs produced should be treated as living documents and be updated when new data or customer experience feedback becomes available.
- 7.3.4 The Transformation Programme includes a new IT system designed to improve data collection for residents. Improving data collection from service users across the nine protected characteristics will benefit decision making by ensuring that decisions are based on clear evidence about the service user base, helping to assess the likely impact of proposed changes upon them. Projects will also benefit from data around customer satisfaction across the protected characteristics to ensure that the Council is delivering a fair and equitable service to all protected groups.

Comments and approval provided by Helen Reeves, Head of Strategy and Policy, 08/03/2024

7.4 HUMAN RESOURCES IMPACT

7.4.1 There are no immediate human resources impacts arising directly from the recommendations in this report. However, there will be impacts associated with the development and delivery of the Housing Transformation Programme. The Housing Transformation Programme constitutes a key part of the Mayor's Plan, and it is inevitable that the Plan will have an impact on the Council's workforce. This will be managed under the Council's policies and procedures as the need arises. And will include but not limited to, the Recruitment Policy as well as the Restructure & Reorganisation Policy, which may include redundancies/redeployment/insourcing/TUPE of staff.

- 7.4.2 To achieve an enduring culture change in the housing directorate a set of appropriate and carefully designed organisational development initiatives will need to be created and delivered to enable that change, with contextual relevance and sensitivity. To implement this action, input will be required from the Council's Learning and Development Team and may incur extra costs if additional capacity is required for designing and implementing the change programme via an external provider procurement.
- **7.4.3** Any HR issues arising will be managed under the Council's Corporate Policies and Procedures, including, as appropriate, meaningful consultation with the trade unions and affected staff groups.
- **7.4.4** Approved by Jennifer Sankar, Head of HR Housing Directorate & Head of HR SCRER for and on behalf of Dean Shoesmith, Chief People Officer [29/02/2024].

7.5 CRIME & DISORDER IMPACT

- 7.5.1 Crime and disorder have a disproportionate impact on our housing tenants, across the whole crime spectrum from anti-social behaviour through to domestic violence and is one of the highest concerns of residents. The Housing transformation plan and the reconciliation of the HRA budget is strengthening our response to these concerns and is improving how we work as a council and partner to support our residents, reduce crime and disorder, and make Croydon safer.
- **7.5.2** In particular, the new Homelessness Prevent and Rough Sleeping strategy will directly contribute towards improving ASB, protecting some of our most vulnerable residents, and our response to victims of domestic violence in the Borough, and is a key part of the borough's statutory work to reduce crime and disorder.
- **7.5.3** Comments approved by Director of Culture & Community Safety, Kristian Aspinall [29/02/2024]

8 APPENDICES

Appendix A Voluntary Undertaking submission

Appendix B Programme Workstreams

9. BACKGROUND DOCUMENTS

N/A

10. URGENCY

N/A

Appendix A

London Borough of Croydon: Voluntary Undertaking for Regulator of Social Housing – Sept 2023

1. Introduction

In March 2021, an ITV media show reported on the appalling living conditions of social housing residents living on the Regina Road Estate, South Norwood. As owners of these social housing properties, the London Borough of Croydon (LBC) commissioned the Ark consultancy to investigate the issues causing the conditions endured by residents. At the same time a self-referral was made to the Regulator for Social Housing (RSH) for breaching the Home Standard and Tenant Involvement and Empowerment standard.

In May 2021, LBC was served a regulatory notice by the RSH for breaching the Tenant Involvement and Empowerment Standard and the Home Standard.

The areas of the standards breached are:

Home Standard: Repairs and Maintenance

- Provide a cost-effective repairs and maintenance service to homes and communal
 areas that responds to the needs of, and offers choices to, tenants, and has the
 objective of completing repairs and improvements right first time
- Meet all applicable statutory requirements that provide for the health and safety of the occupants in their home

Tenant Involvement and Empowerment Standard

- Provide choices, information and communication appropriate to the diverse needs of their tenants in the delivery of all standards
- Have an approach to complaints that is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly.
- Treat all tenants with fairness and respect
- Demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.

In May 2021 the Ark Consultancy concluded from their investigation that there were several areas which led to severe failings within the Housing service:

- A lack of capacity and competence
- A poor operating culture with a lack of care and respect for tenants
- Systemic problems in how the Council communicates and deals with tenants' concerns and complaints

- Weak performance management meaning senior managers do not appear to know what is going on
- Poor use of data and 'intelligence' by the Council and its contractors

In the May 2021 Cabinet meeting, LBC accepted these findings and agreed to develop a Housing Improvement plan to address these issues and return to compliance.

2 Returning to Compliance

The Regulator expects registered providers to take responsibility for self-improvement and where they believe the social housing provider has the capacity and capability to respond to the issues, and they have a detailed plan to address compliance recovery, they will consider a voluntary undertaking.

The period since the breach of the consumer standards has been tumultuous for LBC. The immediate response to the breach focused on engaging with and rehousing of some of the key residents affected at Regina Road.

At the time of the breach, the teams responsible were dispersed across the council and an early action brought the teams together under one housing directorate with a view to recruit a permanent Corporate Director for Housing. This difficult early period was marred by intervals of interim managers and interim housing directors responding reactively and struggling to identify and address the deep-rooted dysfunction that existed. This resulted in a lack of direction within the directorate and without a clear plan of action to re-comply with the standards and deliver appropriate services to our customers. An independent Housing Improvement Board was established (Dec 2021) with resident representatives sitting alongside partners from the LGA, London Councils and the Council's Improvement & Assurance Panel. They worked closely with interim directors to drive improvements to the service but were unsupportive of the initial improvement plan which went to Cabinet in March 2022.

The election of a new Executive Mayor coupled with the recruitment of a permanent Corporate Director in May 2022 presented an opportunity to understand the deep-root failings that had led to non-compliance with a view to creating a programme of transformation which would address the core issues across the housing service. The Ark Consultancy findings were used as a starting point to inform a large-scale diagnostic involving, staff, managers and residents conducted between July – September 2022. This diagnostic identified several issues and was used to create a programme of projects to deliver sustainable change. This programme was approved by LBC Cabinet in December 2022 and endorsed by the independent Housing Improvement Board in the same month. It should be noted that the Housing Improvement Board have been instrumental in shaping the approach to the programme ensuring it is fit for purpose and providing continuous challenge.

Key initiatives within this programme are designed to address the issues which led to the breaches of the stated consumer standards. These initiatives form part of the undertaking to be monitored by the RSH and we have updated the RSH on progress in our regular meetings.

3 The Issues

The breaching of the consumer standards was due to numerous issues that are outlined below. Understanding these issues has been key to developing a programme to address them effectively.

The issues are sometimes distinct and relate to only one aspect of the breach but often the issues cut across the standards and across the housing service.

3.1 The Repairs Contractor and contract management

The Repairs Contractor had been underperforming for a substantial period of time. Contract management discussions resulted in occasional improvements, but these were not sustained. Data on performance (including repairs logged, appointments kept, repairs completed and direct complaints) was contractually held by the contractor. This dependency created an unreliability on the quality and integrity of data which made it harder to contract manage. The set-up of the contract also hampered improvements with a "Price per property" model failing to incentivise the contractor as costs sharply escalated over the preceding years. This coupled with insufficient contract management expertise and poor staff capability in leading this relationship, had a substantial cumulative impact on services delivered to customers. The Repairs contractor eventually gave notice on the contract with a termination date of July 31st 2023.

3.2 Escalation

Issues existed around poor escalation pathways for repairs. Customers, staff and managers struggled to escalate repairs and complaints which resulted in dissatisfaction amongst customers, staff and managers. A lack of response from the contractor and poor contract management led to high levels of complaints and frustration for many involved. Teams did not have sufficient pathways to escalate matters and little recourse given the looming departure of the existing contractor.

3.3 Poor organisation of resource and under-development of skill

From inception and as a result of the speed at which disparate teams from across the council were brought together, the housing directorate as a whole, struggled with direction and organisation. Bringing the teams together without an overarching model of service delivery resulted in duplication of effort within teams, poor strategic planning and disjointed interfaces. A lack of experienced leadership at director level led to poor organisation of resources, a general feeling of being overworked with little progress demonstrated and ineffective problem-solving. This impacted on the ability to manage complaints, manage requests, and deliver effective outcomes for customers. It also meant a lack of long-term planning and permanent firefighting without core issues being addressed. This can be evidenced in the lack of an up-to-date Housing strategy, Homelessness strategy, Asset Management Strategy and Housing Investment/build programme.

3.4 Under-development of skills

The housing service has had insufficient focus and effort on developing staff and managers over recent years. A lack of professional development and behavioural development coupled with insufficient management of poor practice has resulted in poor service delivery.

3.5 Inadequate data and deficient systems

Use of outdated and/or manual systems that didn't contain reliable customer or up-to-date asset data led to inefficient decision-making and a lack of joined up response. Teams were less able to assess trends in asset depletion and health and safety concerns as well as monitor contractor performance. Poor data, poor information sharing and the lack of a single view of the customer delivered sub-standard services as demonstrated by poor void turnaround, poor set-up times for rent accounts and a lack of long-term asset planning.

3.6 Inadequate Performance Management

Poor data across the housing teams and a lack of performance data monitoring resulted in poor performance management practices and a lack of emphasis on using Key Performance Indicators to manage service improvements and contractor performance. This translated into fewer appraisals, fewer objective setting meetings and a loss of performance management overall. No reliable performance dashboards existed by which robust performance management occurred.

3.7 Fragmented Complaints system

Customers had been complaining to the housing teams via the corporate complaints system, via tenancy officers and via the corporate contact centre. These complaints were then distributed to the appropriate complaints' teams within the housing teams. Resource issues, poor escalation pathways (as described above) and a lack of trend analysis and learning from complaints led to recurring issues, customers feeling disrespected and ignored and issues that could have been more quickly eradicated. Residents also found it difficult to access the complaints system online and this led to further frustrations.

3.8 Poor behaviour

Residents described feeling disrespected by council officers, being blamed for the issues arising in their properties and generally not being heard. They had, on occasion, been left feeling like the officer they are engaging with did not demonstrate empathy with their situation or their needs and did not treat them with respect. When explored further with staff, there were issues of attitude and behaviour which need to be addressed, however there are also issues of processes that don't empower staff to deliver services to customers, frustration that the escalation processes don't work and that resources feel stretched. These are all issues that need to be addressed.

3.9 Poor engagement

The housing teams did not have an approach or strategy for engaging with residents in a meaningful way on key decisions which would impact them. When engagement did occur, it was considered tokenistic and not impactful. Again, residents were left to feel their views didn't count and they went unheard.

The issues outlined above are complex and intertwined with cultural issues that the housing directorate needed to address. The programme of transformation was deigned to address the issues over a short, medium and longer-term period with the change being sustained through the designed interventions.

4 How we are addressing the Issues.

The new housing directorate leadership team, led by the permanent corporate director, designed a programme of transformation composed of eight workstreams and over seventy projects over a three to five-year time-frame (with a view that projects can also be added to the programme as time progresses and needs evolve). The workstreams address issues wider than those outlined above and broader than the breaches of the consumer standards, however the focus of this report will be on those projects which directly address the breaches so LBC can return to compliance. The programme is governed by the Transformation Steering Board which is chaired by the Corporate Director for Housing and attended by the Cabinet member for Homes and meets monthly to review progress. Colleagues from across the council are invited to attend as appropriate. Progress is also monitored regularly:

- by the Housing Improvement Board through formal board meetings and update workshops;
- By the Tenant and Leaseholder panel;
- With Cabinet receiving an update on progress on a quarterly basis;
- By Scrutiny; and
- Through regular engagement with the Improvement and Assurance Panel.

As of the end of August 2023, several projects have already completed which address in part, the breaches. These are outlined below:

4.1 Achievements to date:

| Activity | Outcome |
|--|--|
| Vision & Mission set | Give direction to the housing directorate and set out the service expectations to all. |
| Regina Road short term remedy plan completed | Re-housing of worst-affected residents. An extensive programme of repairs, including fire safety works, has been carried out. Detailed surveys of all blocks have been undertaken and shared with residents. |
| Regina Road Long – term planning | Residents of Regina Road have been involved in an extensive engagement, consultation and ballot. As of June 2023, 88.1% of those voting (80%), voted to demolish the estate. Cabinet approval to demolish and rebuild provided in July 2023. Work is currently underway on next steps. |
| Change in leadership team | More experienced interim leaders brought into the service to drive improvements and re-structure services. |

| | Recruitment to new divisional leadership roles has commenced |
|---|---|
| Residents Charter co-created and approved | Declaration of our commitments to residents – embedded in restructures and operating models |
| Re-procurement and mobilisation completed for new Repairs contracts | Three new contractors selected to deliver improved services for repairs, voids and heating. There are 2 suppliers for repairs and voids; contract 1- 70% of the borough; contract 2- 30% of the borough. There will be one contract for heating maintenance. These contracts have now been mobilised. |
| Repairs Contact Centre | Insourced a new repairs contact centre to take calls and schedule repair appointments. Enable LBC to own initial relationship between customers and repairs service – delivering a better direct communication channel |
| Establishment of contract Management Hub | A new Contract Management Hub has been set-up for the new contractors to be more expertly managed |
| HRA recharges reviewed and SLAs created | Ring fenced funding is protected for services directly delivered to residents - circa £9m rectified |
| Rents consultation completed | Residents clearly informed of increases to rents and impact on services for 23/24 and a rolling programme in place for subsequent years |
| Drafted Voids Lettable standard | Clear standard set for acceptable voids for residents – ensuring fit for purpose homes with clear commitments |
| New Damp & Mould response team | Dedicated response team to triage and proactively manage damp & mould cases in stock |
| 5% sample Stock Condition survey completed | Undertaken to understand the extent of survey required and reprogramme costs. Full survey programme now in place. |
| NEC system | New customer interface and asset management system now live. Removal of most manual and outdated systems. |
| Data Cleansing exercise | As part of the NEC system implementation programme, we have conducted a data cleanse exercise so that clean data is uploaded into our new systems |
| Estate walkabout/inspection programme | Programme of engagement with residents on estate improvements. |

| Consumer Standards review | Self-assessment against existing Consumer Standards informing service development plans |
|---------------------------|---|
| Compliance | A new and very experienced Head of Building Safety and Compliance manager has started working with us on restructuring the compliance function to ensure full compliance with our statutory obligations. Sufficient resource allowance made from HRA budgets. |
| Competency Model | New competency model designed setting out behavioural expectations of staff and managers |

These projects demonstrate our commitment to making services better and form part of the journey to return to compliance.

4.2 Projects in progress to address the breaches:

The following projects are ongoing and contribute to our return to compliance. They are set out according to the standard which they address:

4.2.1 Projects which address the Home Standard

| Project | Purpose | Milestones | Dates |
|---|---|---|-----------|
| 1.5 Re-structure of the Housing Directorate | To conduct a review and restructuring of the Housing Directorate divisions following reviews of performance, operating practice and delivery to best deliver efficient and effective services to customers. To stabilise leadership at a senior level to deliver improvements and lead employees in transforming the service. | New Housing directorate structure finalised and posts recruited to | Dec-2023 |
| 2.1 - Performance review framework | To devise and implement a Performance framework which sets out clear measures of performance for service areas and enables appropriate objective setting for staff, projects and initiatives with focus on customer services. To refine which KPIS are shared to improve business intelligence. | Performance Dashboards with KPIs for DMT and the Housing Improvement Board are finalised. | July 2023 |
| 4.3 Asset Management | The Strategy will detail our long-term plan for the management of our Council stock (as part of a ten-year | Stock condition survey 1/3 target achieved | Dec-2023 |

| Strategy | rolling programme) and link in with clear financial planning. | HRA Business Plan & Asset Management Strategy | Mar-2024 delayed to April 2024* |
|--|---|---|---------------------------------------|
| 6.3 Repairs restructure and behaviour change programme | To have an effective, motivated and skilled workforce which can manage the new repairs contracts and deliver our capital and asset management programmes. To have sufficient capacity within the Compliance function to monitor and provide assurance against the big 6 | Agree structure in alignment with operating model and statutory requirements Implement/complete restructure including change mgmt. In alignment with operating model | July 2023 Dec 2023 |
| | | Training plan | Mar-2024 |

4.2.2 Projects which address the Tenant Involvement and Empowerment Standard

| Project | Purpose | Milestones | Dates |
|--|--|---|---|
| 3.2 Resident engagement strategy | To set out how residents will be engaged in decision-making, information-sharing and consultation | Obtain feedback from stakeholders and wider residents on proposals | Jul-2023 |
| | | Draft strategy shared with HIB and TLP | Sept-2023 |
| | | Final strategy submitted to Cabinet for scrutiny and approval | Dec-2023 – delayed to Summer 2024* |
| 3.4 Customer Information Review | To evaluate the information captured for customers, profiling customer information, ensuring characteristics are used to inform communication channels and service delivery. | Gap Analysis completed on existing data | Jun-2023 |
| T COVIEW | | Action Plan implemented | Aug-2023 |
| | | Profiling exercise - feeding into operating model | Nov-2023 |
| 3.7 Customer Care Training Programme | Transform customer interactions through a programme of training | Procurement process | Jul-2023 |
| | | Commence delivery Phase 1 | Sep-2023 |

| | focused on behaviour and creating a positive customer experience | Delivery Phase 2 | Nov 2023 – delayed to April 2024 |
|--|--|--|--|
| 3.8 Review of | Improve and standardise responses, minimise backlogs and learn from | Problem investigation complete | July-2023 |
| | complaints – ensure the process for managing complaints is easy to navigate for customers | Solution designed and action plan & onboarding of Complaints Mgr | Aug-2023 |
| | | Review of approach | Oct-2023 |
| 6.6 Review of | Aligned with a new operating model, new contractors, new service | Prioritisation of policies and procedures | May 2023 |
| Policies and procedures | standards and utilising our customer data – a review of our procedures and policies to deliver better outcome for our customer base | Implement tier one review | June 2023 |
| | | Implement tier two review commence | Nov 2023 |
| 7.2 Enabling high-performing teams and | Creation of a competency model setting out clear behavioural expectations and linking it with | Competency Model drafted and shared with DMT | June 2023 |
| setting | succession planning, recruitment and recognition | Competency Model consultation | August 2023 |
| | | Competency model launch | Sept 2023 |
| | | Link to appraisals | Mar 2024 |
| | | Link to recruitment | Mar 2024 |

4.2.3 Projects which address both Standards

| Project | Purpose | Milestones | Dates |
|-------------------------|---|--|---------------------------------------|
| 1.3 Housing Strategy | To compose a Housing Strategy which sets out the long-term Strategic Aims of the Housing directorate incorporating the environmental and organisation constraints | Draft priorities out for consultation Strategy to Cabinet | June/July 2023 November 2023 |
| 3.10 Consumer | Assessment against the four consumer standards to ensure compliance and | Consumer Stds audit and action plan | June 2023 |

| Standards Review | best practice and implementation of action plan | Update to Transformation Programme | Oct 2023 |
|---------------------|---|--|-----------|
| 3.15 NEC | Delivery of NEC Housing in order to exploit the capabilities of a modern system presenting a single view of the customer. The relational database | New NEC Data Management System Implemented - Phase 1 | June 2023 |
| | reduces data duplication and allows all service areas to share resident, property and repairs information. | New NEC Data Management System Implemented - Phase 2 initiated and planned | Oct 2023 |

^{*}timescales extended with regulator

5 Evidencing Compliance

The Housing Transformation Programme will deliver compliance against the consumer standards as projects directly target the cause of the breach and deliver improved outputs.

5.1 Milestones

Achieving the milestones is one form of evidence and we have sought to ensure the milestones clearly link to the return to compliance. Progress against the milestones will be monitored at meetings with the Regulator, Transformation Steering Board and Housing Improvement Board as stated above. In addition, we provide updates to Cabinet on a regularly basis and scrutiny subcommittee.

5.2 Key Performance Indicators

Key Performance Indicators are part of how we monitor impact of the projects, and these indicators are reviewed in Housing's monthly performance meetings, the monthly corporate performance meetings as a senior leadership team and performance reporting to the Mayor. The KPIs which we monitor are mixed in terms of the direct causal relationship between indicator and intervention. In some cases, it is obvious and direct e.g. gas safety checks, however, for others e.g.TP08 Agreement that the landlord treats tenants fairly and with respect, it will be the case that numerous interventions will impact the TSM. We will continue to monitor and take a more holistic view on the impact the interventions are making. KPIs monitored for our journey back to compliance can be found in Appendix 1.

It is expected that we will be demonstrating a positive trajectory consistently against these KPIs from January 2024 onwards. This allows for the cleansing and rebasing of our performance data following the implementation of NEC and the onboarding of new contractors in August 2023. We will be using HouseMark data (annual data sets) to measure our performance against peers and will be expecting to start meeting Median targets by September 2024 if not earlier. This allows for the performance to be reflected in the data collection for which there will be a lag. Meeting (at least) the Median target is part of the journey and not the end destination for our performance and we will be looking to

continuously improve from that position over the years ahead. The targets outlined in Appendix 1 are based on consideration being given to the transformation projects outlined within this report having an impact on those performance areas and is based on actuals known as of July 2023.

5.3 Timescales and impact

The housing directorate is on its way to compliance, but the transformation journey is one expected to take another two years. Having said that we are confident that we will be fully compliant with the consumer standards by September 2024. This allows for the Repairs contracts to be embedded and working well, providing significant improvements in customer satisfaction metrics by September 2024 (allowing for the lag in data collection). In addition, the restructures will be implemented and the majority of projects described above will be complete. Staff groups will be working in a new operating model with customers sitting at the core, performance will be monitored closely and issues or dips in performance will be picked up in our Performance Management Meetings (held monthly) and by our new Customer Insight team. We will have a complaints process in place which will allow customers to easily make contact to raise a concern and we will be monitoring trends in complaints to identify areas to improve and address in a more planned way.

Our Asset Management strategy will be agreed at Cabinet with a costed HRA Business plan associated with it guiding our planned programme of investment. A new "development and new supply division" will be working on our regeneration plans and looking at how we will address our remaining LPS blocks, in addition to looking at our wider supply plans with partners. Staff will have undergone a training audit and will be equipped with tools and the mindset to deliver better customer service whilst also awaiting any professional qualifications training/opportunities that have been identified for them.

We will be fully compliant with the consumer standards and our Tenant Satisfaction measures will be consistently improving. Our compliance teams will be appropriately resourced and we will have high levels of confidence in our metrics and in the actions we have completed to ensure compliance with the Building Safety Act and Fire Safety Act. The experience for our customers will feel markedly different with more engagement, empathy and respect demonstrated across the service. Whilst we may not always get the service right, we will keep customers informed of our actions, involve them in key decisions that affect them and seek to rectify issues quickly and fairly.

6.0 External Assurance

We will commission an external partner/s to assess how we are performing against the consumer standards to provide additional assurance to ourselves, our customers and the regulator for social housing. We will look to commission this provider in the summer of 2024 with a view to reporting back in October 2024.

Appendix 1 Performance Metrics

KPIs for the Tenant Involvement and Engagement Standard:

| Measure | Median from HouseMark Annual report Jan 2023 | Actual (Q1 23/24) | Target Sept 2024 |
|--|--|-------------------|------------------|
| Overall satisfaction | 60% | 60% | 75% |
| Satisfaction that the landlord listens to tenant views and acts upon them | 42% | 45% | 50 % |
| Satisfaction that the landlord keeps tenants informed about things that matter to them | 55.4% | 60% | 80% |
| Agreement that the landlord treats tenants fairly and with respect | 59% | 65% | 75% |
| Satisfaction with Complaint handling | 26.8% | 35% | 60% |
| Complaints responded to within the CHC timescale | tbc | tbc | 80% |
| % increase year on year of data profiling on our customers/Tenants | n/a | tbc | 5% |
| Escalation of complaints to stage 2 | n/a | 9% | 7% |

KPIs for the Home Standard:

| Measure | Median from HouseMark Annual report Jan 2023 | Actual Q1 23/24 | Target Sept 2024 |
|--|--|---------------------|------------------|
| Gas safety Checks | 99.98% | 99.5% | 100% |
| Fire Safety Checks | 99.4% | 99% | 100% |
| Asbestos Safety Checks | 100% | 98.5% | 100% |
| Water Safety Checks | 100% | 100% | 100% |
| Lift Safety Checks | 100% | 98.1% | 100% |
| Electrical Checks (EHICS) | 100% | 93% | 100% |
| Homes that do not meet the Decent Homes Standards | 10.35% (July 23 benchmark) | 0.13%* | 0% |
| Repairs completed within target timescale | n/a | new contractor data | 80% |
| Satisfaction with Repairs | 63.7% | 65% | 70% |
| Satisfaction with time taken to complete recent repair | 62% | 53% | 62% |
| Satisfaction that the home is well maintained | 58% | 52% | 58% |
| Satisfaction that the home is safe | 69% | 65% | 69% |
| Appointments made and Kept | n/a | new contractor data | 80% |

^{*}Data reliant on APEX will be reviewed with stock condition outputs and Damp and Mould/disrepair cases

The eight workstreams within the programme are:

Workstream 1: Vision, Direction & Transformation Plan for Housing Directorate **Purpose:** To establish a direction for the directorate, identify key challenges internally and externally, determine priorities, structure directorate accordingly to deliver improve services

Workstream 2: Governance & Information Management

Purpose: To develop a robust framework for effective governance of the directorate to ensure accountability, high performance, and effective financial and information management.

Workstream 3: Customer Excellence

Purpose: To deliver a Customer Excellence approach to re-focus the directorate on delivery of excellent customer services that meet and exceed the Tenant Involvement & Empowerment Standard.

- Workstream 4: Long-term Home and Neighbourhood Planning & Investment
 Purpose: The proactive management of our Homes and Neighbourhoods to create robust investment plans and deliver regeneration ambitions.
 - Workstream 5: Asset Compliance

Purpose: To develop a compliance service with a robust framework for ensuring compliance with legislative and regulatory standards, ensuring safe and compliant homes

Workstream 6: Maintaining our Homes

Purpose: The reactive maintenance of our assets to meet and exceed our obligations to the Home Standard, ensuring supply of homes is optimized for customers and income.

Workstream 7: People & Organisational Development

Purpose: To proactively manage our culture, our development as a directorate and enable our workforce to deliver excellence to our customers, partners, and each other.

Workstream 8: Managing our Housing Needs

Purpose: To proactively manage our Housing Needs Statutory Duty.