



Committee Report

PURPOSE: Final Decision Report

KEY OR NON-KEY DECISION: Non-key decision

COMMITTEE: Homes and Housing Delivery Committee

DATE: 01 November 2024

TITLE: Housing & Consumer Standards Programme and Compliance Update

Ward(s): Citywide

Officer presenting the report: Fiona Lester and Richard James **Job title:** Director of Housing & Landlord Services and Housing & Consumer Standards Programme Lead

Committee Chair: Cllr Barry Parsons

Executive Director lead: John Smith: Executive Director for Growth & Regeneration

Proposal origin: BCC Staff

Purpose of Report:

1. To note and comment on the Housing & Consumer Standards Programme (H&CSP) improvement plan summary.
2. To note and comment on the H&CSP landlord compliance programme backlog performance update.
3. To note and comment on the feedback from the recent Housing Scrutiny Panel, Housing Forums and Stakeholder Engagement Event. To note the role of the Housing Scrutiny Panel to help the H&HDC to hear the residents voice within the H&CSP updates.
4. To note and comment on the update from the latest regulatory review meeting with the Regulator of Social Housing (RSH)

Evidence Base / Options to consider:

1. H&CSP Improvement Plan Update Summary (September 2024) – Appendix Ai

- 1.1. The H&HDC has will review progress against the H&CSP improvement plan at each Committee meeting. The latest update summary that outlines the end of September position is included in appendix Ai. It provides an update on progress with the current phase and overall programme actions. It also identifies key work areas at risk of delay and summarises general progress against each programme workstream and phase. A summary at the top of the improvement plan update gives an outline of the five workstreams and what activities are covered in each workstream. Workstream 1 covers the issues identified in the Regulatory Judgement.

- 1.2. A progress update was presented to the H&CSP board meeting on 25 September. It outlined that progress had been made on the completion of phase one (April 24 to Sept 24) tasks with four tasks being signed off at the September programme board meeting. The tasks related to; the completion of a legionella backlog risk mitigation exercise, additional recruitment to complaints handling roles, the completion of the Strategic Housing Review and sign off of the new strategic performance reporting pack.
- 1.3. Table 01 outlines the top activity areas that are at 'risk of delay'. These relate to; HHSRS (Health & Safety Rating system) risks, electrical, fire safety and damp & mould. A summary of the risk and the risk mitigations are outlined in table 01.
- 1.4. Table 02 of the summary in appendix Ai shows that the majority of tasks are under workstream one and relate to the Safety & Quality Standard. A large proportion of these tasks are due in phases one and two of the programme. There are also a number of key tasks included in phase one which relate to workstream five – Strategy, Culture & Governance workstream. At the end of September:
- 60% of tasks were 'on track' (*reduction of 8% from the August update*),
 - 21% 'at risk of delay / overdue' (*increase of 6% from the August update*)
 - 19% 'complete' (*increase of 2 % from the August update*).
- 1.5. Table 03 shows that at the September programme board meeting, 72% of tasks were either 'complete' (56%), or 'On Track' (16%). There were 28% of tasks identified as 'At Risk of Delay / Overdue' (13%) which was an increase of 7% compared with the August programme board update. The majority of tasks due to complete in phase one are under workstream one that relate to the Safety & Quality Standard. There were also a number of key tasks included in phase one which are workstream five 'strategy, culture & governance' related activities. The tasks that were classified as 'at risk of delay' for phase one are related to policy, data and process reviews.
- 1.6. There was good progress reported on reducing the backlog of response repairs mainly through the data cleansing activity which has also identified outstanding works. It was recognised that there is further work to do to ensure that future backlogs are prevented and a detailed response repairs review paper will be presented to the October programme board. This will identify remaining issues / key themes and recommend actions required to mitigate against future backlogs arising.
- 1.7. The phase one RAG rating was downgraded to amber from green at the September programme board due to the increase in 'Task at risk of delay / overdue'. The programme board recognised that at the time of the September programme board meeting, there was only a small amount of the phase one time period remaining (April 24 to Sept 24). At the time of the project board meeting, there were 16% of the phase one on track tasks due to be completed before the end of September.

2. Performance update on Landlord Compliance Programme Backlog Activities – Appendix Aii

- 2.1. Appendix Aii outlines the landlord compliance against the H&CSP backlog activities. The bar charts and tables summarise performance against the non-compliance / backlog areas included in the self-referral to the Regulator of Social Housing (RSH) in April 2024 and their Regulatory Judgment. The bars in blue highlight the self-referral position and the bars in orange outline the current performance position. In some areas, ongoing data analysis into BCC's compliance position has meant that larger backlogs have been identified than was known at the time of the self-referral. These are identified with a grey bar. The tables also give further dialog on the performance, reasons for the current performance and plan to improve performance. The performance statistics are taken from the mid-September 2024 position. Going forward performance will be taken from an end of month position.
- 2.2. Progress is being made against the:
- electrical inspection and remedial works backlogs
 - asbestos inspections to communal areas
 - fire risk assessments
 - water risk assessments and remedial works
 - response repairs backlog
- 2.3. Challenges remain regarding the delivery of fire remedial works and damp & mould inspections and remedial works. These areas were also identified as 'at risk' within the programme update outlined in section 1 and appendix Ai. The September H&CSP board discussed these areas in detail and will continue to focus on the plans to improve the compliance position regarding these areas at the October Programme Board meeting.
- 2.4. The HHSRS position relates to historic risk identified and doesn't include recent risks identified through the stock condition survey or other reactive inspections. These will be captured and reported through the business as usual (BAU) reporting.
- 2.5. The BAU strategic performance report metrics that were agreed at the September H&HDC and are already established, will be included in the Q2 (up to end of September 2024) report. Due to the proximity of the 1 November H&HDC meeting to the end of quarter (up to 30 September 2024), the performance summary won't have progressed through the governance pathway to enable presentation at this meeting. The Q2 BAU performance report will be presented to the January 2025 H&HDC. As outlined at the September H&HDC, the full performance report will continue to be develop during 2024/25.
- 2.6. The corporate Quarterly Performance Report (Q1 2024/25) is included in the 1 November H&HDC meeting pack under a separate item. This existing corporate BAU performance reporting includes a small number of H&LS metrics for Q1 2024/25. The Q2 expanded BAU reporting (see item 2.5) will complement the existing corporate performance reporting.

3. Summary of Feedback from the Housing Scrutiny Panel, Autum Housing Forums and Stakeholder

Engagement Event

- 3.1. In the external consumer standards preparedness review undertaken in late 2023, Savills identified a number of areas where the council should improve the way it listens to and responds to the ‘resident voice’. Savills identified a number of improvements required to meet the Transparency, Influence and Accountability Standard. The main areas identified were:
- more routes needed for residents to contribute and provide scrutiny – opportunity to hold their landlord to account
 - need to demonstrate how it has listened to and acted upon resident views
 - need to engage with more residents and improve the diversity of resident voice
 - residents having limited influence over the service
 - insufficient and inaccurate resident data.
- 3.2. In September, a consumer standards session was held with the resident led Housing Scrutiny Panel which is an engaged resident group who review the quality of services being provided. Two consumer standard sessions were also held at the Autumn Housing Forums which is a meeting open to any council resident or councillor to attend to hear about and discuss the housing services being provided by the council.
- 3.3. On the 7 October 2024, Cllr Parsons and other senior council officers met with representatives from six Voluntary, Community and Social Enterprise organisations representing a number of key stakeholders. Representatives from; Acorn, Bristol Somali Resource Centre, SARI, Black South West Network, Lockleaze Neighbourhood Trust and Bristol Law Centre attended the meeting. The round table event discussed the; regulatory judgement and background to the consumer standards, what residents are telling us about the services the council provides and what we are doing to improve the quality of services and meet the consumer standards.
- 3.4. The Housing Scrutiny Panel will carry out an oversight role on the delivery of the H&CSP improvement plan and review / comment on programme and BAU related performance. The Housing Scrutiny Panel will also have an opportunity to review and comment on updates and discussions that take place at the H&HDC. Comments from the Housing Scrutiny Panel will be fed into each H&HDC update report.
- 3.5. The events were productive and gave residents an opportunity to comment on their experiences with the housing services being provided by the council. Table 01 summarises; the issues identified, the link to the Consumer Standards and how the H&CSP is responding to the issue identified.
- 3.6. A new Resident Engagement Strategy is being developed and will be presented to the H&HDC in late financial year 2024/25. The strategy will take into consideration the resident feedback outlined in table 01. It will also outline how the ‘resident’s voice’ will be heard and responded to.

Summary of issue identified	Consumer Standards	What the plans are to respond to the issue
Concern about the	Transparency,	There are plans in progress to improve the council’s approach to

time it takes to raise a complaint and get in touch with the council to raise an issue.	influence and accountability standard	complaints handling. This will include: <ul style="list-style-type: none"> recruiting additional staff to increase capacity in complaint handling and triage requests (complete), implementing a revised IT system to support the monitoring of complaints in compliance with the Housing Ombudsman code (complete) implementing training for staff about the complaint handling code and approach to customer service
Residents feel that they aren't listened to.	Transparency, influence and accountability standard	Residents feeling that they aren't listened to will be explored further with the Housing Scrutiny Panel and BAU operational teams. The findings and any improvement plans will be shared with the H&HDC. Work is underway to ensure the residents voice is heard, including clearly articulating a summary of what residents are saying and the council's response.
The council needs to be more open and transparent when providing health and safety related information about their homes.	Transparency, influence and accountability standard Safety and quality standard	Performance against backlog and BAU landlord compliance activities will be shared with the Housing Scrutiny Panel and the H&HDC. Ways of making information more accessible to residents on their home are also being explored. Plans for improved resident accessible information on health and safety compliance performance are being developed. Communication will be included in the resident's newsletter (Housing News) and the council's website.
Concerns raised about the visibility, accessibility and capacity of Housing colleagues.	Transparency, influence and accountability standard	Accessibility of Housing colleagues to residents will be explored further with the Housing Scrutiny Panel and BAU operational teams. The findings and any improvement plans will be shared with the H&HDC.
Residents want a more personal approach to communication	Transparency, influence and accountability standard	Ensuring the council has a personal approach to communication will be explored further with the Housing Scrutiny Panel and BAU operational teams. The findings and any improvement plans will be shared with the H&HDC.
Anti-social behaviour significantly affects neighbourhoods	Neighbourhood and community standard	Plan to review the Anti-Social Behaviour Policy and procedures (to be completed by November 2024). This will include analysing Tenant Satisfaction Measure data to understand the drivers of perception.
Concern around the time it takes for repairs and maintenance to be carried out.	Safety and quality standard	An external review of the Repairs and Maintenance service will include the time it takes to complete repairs. A scope of the review is being developed and the review is likely to start before the end of 2024/25. The repairs data review of repair backlog is identifying the causes of delays in completing repairs and identifying the actions required to prevent future backlogs. The review will be completed by the end of December.

4. Update on Engagement with the RSH

4.1. The latest monthly regulatory review meeting took place on 7 October 2024. The meeting was constructive and covered:

- The council's reflections on progress since the self-referral

- RSH approach to social landlord improvement
- The council's September programme progress update & RSH questions
- The council's compliance update

4.2. This was the first time the council had met face to face with the RSH since the self-referral. The focus of the meeting was mainly on reflections on progress to date and the council's ongoing response to the regulatory judgement. The RSH focused on the need for the council to understand the 'root cause' of the issues resulting in the failings highlighted in the regulatory judgement. The RSH also discussed how the council will evidence that all the issues are fully understood and changes implemented to ensure issues don't re-occur. A discussion was had regarding the council doing some further work to clearly articulate the 'road map' for understanding and responding to the 'root causes'. This will be discussed further at the H&CSP board in October and a road map will be presented for discussion at the H&HDC over the coming months.

4.3. The RSH stated that it expected all social landlords to achieve a C1 rating (highest consumer standards rating) although understood that this will take some time to achieve. It reiterated that a C1 rating meant that a social landlord was meeting the 'required standard' against the consumer standards and doesn't represent excellent or exceptional performance. The council should clearly lay out how it will first move from its current C3 rating to C2 and then C1.

4.4. The RSH made clear that it understood that as the council continues to better understand its compliance position and the 'root causes', performance may drop in areas as additional issues are identified. The RSH stated that it was most interested in the council fully understanding the issues, showing progress, and having a clear plan in place to resolve any underlying issues.

Officer Recommendations:

That the Committee for Homes & Housing Delivery

1. Note the Housing & Consumer Standards Programme (H&CSP) improvement plan summary.
2. Note the H&CSP landlord compliance programme backlog performance update.
3. Note the feedback from the recent Housing Scrutiny Panel, Housing Forum and Stakeholder Engagement Event.
4. Note the role of the Housing Scrutiny Panel to help the H&HDC to hear the 'residents voice' within the H&CSP updates.
5. To note the update from the latest regulatory review meeting with the RSH

Corporate Strategy alignment:

1. Homes and Communities:
Management of council homes is pivotal in providing residents with safe warm, secure and affordable accommodation

City Benefits:

1. Fourteen percent of housing in Bristol is owned and managed by BCC, the quality of the homes and services provided by BCC impacts directly on a significant number of households, as well as contributing to delivery of objectives in the Council's Corporate and Housing strategies.

2. The Housing & Consumer Standards Programme will ensure that the; safety, quality, comfort and sustainability of the fourteen percent of housing owned and managed by Bristol is improved. Also, that the residents voice is heard and services are provided to meet the diverse needs of residents.
3. Significant investment in BCC’s homes was agreed in the 2024/25 budget. The investment is focused on improving the safety and quality of homes, making them more energy efficient and building more high-quality homes to meet the increasing demand for social housing within Bristol.

Consultation Details:

1. The external reviews included engagement with a range of colleagues from across BCC.
2. There has been proactive communication on the self-referral to the RSH, RSH’s Regulatory Judgement and the H&CSP with BCC social housing tenants and leaseholders, BCC colleagues, Cllrs and other external stakeholders. Further engagement events with tenants are taking place in September.
3. A detailed Communications Strategy was approved by the H&CSP Board on 28 August 2024. The strategy includes the implementation of a dedicated communications resources who will work closely with existing teams and lead on the coordination of external and internal communications.

Background Documents:

- RSH’s 9 July 2024 Regulatory Judgement (<https://www.gov.uk/government/publications/bristol-city-council/bristol-city-council-00hb-regulatory-judgement-9-july-2024>)
- RSH guidance on New Regulatory Framework ([Reshaping Consumer Regulation – Our New Approach](#))
- Implication of new legislation on High Risk buildings ([Guidance on the criteria for being a higher-risk building - GOV.UK \(www.gov.uk\)](#))
- Housing Ombudsman information on the new Complaint Handling Code ([The Complaint Handling Code | Housing Ombudsman Service \(housing-ombudsman.org.uk\)](#))

Revenue Cost	N/A	Source of Revenue Funding	Housing Investment Plan Approved
Capital Cost	N/A	Source of Capital Funding	N/A
One off cost <input type="checkbox"/> Ongoing cost <input checked="" type="checkbox"/>		Saving Proposal <input type="checkbox"/> If yes - existing or new saving? OR Income generation proposal <input type="checkbox"/>	

Professional comments section:

1. **Finance Advice:** During the 2024/25 years budget setting we made allowances for anticipated additional costs for increased safety works. It is likely that actual costs will be higher than our allocation in some areas although this hasn’t been fully determined. To date, there is a current estimated overspend in year of c.£1.8m for additional spend related to the repairs backlog which includes the

completion of remedial works related to safety inspection. We are continuing to undertake our detailed data review which will last until the end of the year. This could result in the identification of additional works that may increase the current budget pressure. There is also an anticipated £4.2m overspend on Waking Watch costs due to delays in the installation of new fire alarm systems because of the time it is taking to gain approval from the new Building Safety Regulator for these works.

We have undertaken a cost pressure review and have identified £1.6m revenue spend reductions which will help mitigate these pressures to some degree. The residual pressures will need to be funded from HRA reserves.

Finance Business Partner: Martin Johnson, Interim Finance Manager Housing and Landlord Services, 10 October 2024

2. **Legal Advice:** The report and updates in the appendices will enable the Committee to assess compliance with the recommendations in the Regulatory Judgement as well as compliance with the Safety and Quality Standard and relevant statutory duties.

Legal Team Leader: Nancy Rollason, Head of Legal Services, 11 October 2024

3. **Implications on IT:** The Housing & Consumer Standards Programme will require, among other things, more accurate, complete and timely collection of housing data, particularly repair and maintenance activities, if the existing poor data (which is being remedied) is not simply added to. Staff will be using the new NEC system (currently being implemented by the HITT Programme), and clearly this technology must align with the changes in processes and data input activities that will be necessary to achieve 'clean' data going forward. It will be important to understand the implications in terms of staff training, supervision and reporting that must be part of this, as well as whether any enhancements or modifications to the NEC software might be beneficial in the medium-term future – noting that tight HITT Programme timescales will not allow any software changes in the short term.

IT Team Leader: Paul Day, Digital Transformation Delivery Consultant, and Exec on the HITT Programme 14 October 2024

4. **HR Advice:** To address immediate and long-term improvement actions, HR are supporting the service to recruit additional temporary and permanent staffing resource to expedite the work. The Director: Workforce and Change and HR Business Partner for Growth and Regeneration are on the board ensuring there is senior HR ongoing dedicated advice and support to the programme.

HR Partner: Celia Williams, HR Business Partner 11 October 2024

APPENDICES

Appendix A – Further essential background / detail on the proposal YES

- Appendix Ai - H&CSP Improvement Plan Update Summary (September 2024)
- Appendix Aii – Landlord Compliance Programme Backlog Compliance Performance Report (September 2024)

Appendix B – Equality Impact Assessment (EqIA) **NO**

Note – The H&CSP was included in the July 2024 update

Appendix C – Environmental Impact Assessment (Environmental Impact Assessment) **NO**

Note – Propose to utilise the 2024/25 EIA as the activities that will impact an EIA remain the same although will be re-prioritised.

Appendix D – Decision Risk Assessment **NO**

Appendix E – Exempt Information **NO**

Appendix F – Details of consultation carried out - internal and external **NO**

Appendix G – Options appraisal matrix **NO**

Appendix H – Business case / financial analysis **NO**