



# Committee Report

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**PURPOSE:** Final Decision Report

**KEY OR NON-KEY DECISION:** Non-key decision

**COMMITTEE:** Homes and Housing Delivery Committee

**DATE:** 13 December 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 (Appendix Ai)
2. To note and comment on the H&CSP landlord compliance programme backlog performance report (Appendix Aii)
3. To note and comment on the business-as-usual landlord compliance performance report (Appendix Aiii)
4. To note and comment on the 'root cause' reviews update
5. To note and comment on the draft Consumer Standards Improvement Strategy (Appendix Aiv)
6. To note and comment on the feedback from the recent Housing Scrutiny Panel and Winter Housing Forums
7. 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 – Appendix Ai

- 1.1. The latest update summary included in appendix Ai outlines the position reported to the October Housing and Consumer Standards Programme (H&CSP). 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.
- 1.2. A update was presented to the H&CSP board meeting on 23 October 2024. It outlined that progress had been made on the completion of phase one (April 24 to Sept 24) tasks. Two tasks were signed off at the programme board meeting. The completed tasks were related to:
  - **Complaints management**- Implementation complete on a revised IT system (icasework) for monitoring complaints in line with the Housing Ombudsman’s new complaint handling code.
  - **Anti-social Behaviour (ASB) policy** - The existing ASB policy and procedures have been reviewed. The new policy and procedures were approved by HSLT on the 13 November. As per the governance process the policy and procedure will be presented to PCCB on the 9 December for final approval.

The RAG rating has been escalated from amber to red due to 31% of tasks being overdue at the end of the phase 1 time period (April 24 to Sept 24). Further information on the delivery of the improvement plan tasks is outlined in items 1.3 to 1.6.

- 1.3. Table 01 in appendix Ai outlines the top activity areas that are at ‘risk of delay’. These relate to;
  - **Aids and adaptations** – gaps in servicing and remedial works data identified
  - **HHSRS (Housing Health & Safety Rating System) risks** – challenges with the management and delivery of the large number of risks identified through the stock condition survey programme
  - **Fire safety** – slower progress than we would like on the delivery of the large backlog of fire remedial actions
  - **Damp and mould** - challenges with the management and delivery of a large number of damp and mould cases being identified through resident contact, reactive inspections and the stock condition survey programme.
- 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. The October H&CSP update outlined that:
  - 55% of tasks were ‘on track’ (*reduction of 5% from the September update*),
  - 22% ‘at risk of delay / overdue’ (*increase of 1% from the September update*)
  - 22% ‘complete’ (*increase of 3 % from the September update*).
- 1.5. Table 03 of appendix Ai shows that at the end of phase 1 (April 2024 to September 2024), 69% of tasks were complete and 31% overdue. The Management Summary shows a ‘red’ RAG status to reflect the outstanding tasks. The majority of the outstanding tasks relate to; existing process and system reviews, policy development and risk profiling work currently underway. There has been good progress on reducing the backlog response repairs mainly through the data cleansing activity.

We had planned to complete the repairs data review by the end of September 2024 although there was a delay in the initial recruitment of data administration roles that impacted the start date of the task. The repairs data review is likely to continue until early in 2025.

- 1.6. Progress continues to be made on the overdue tasks across the workstreams and it is expected that the majority of the outstanding tasks will be reported as completed at the next H&HDC.

## **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 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. 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 performance statistics are taken from the end of September 2024 position which was presented to the October H&CSP.

2.2. Due to the timing of the 1 November H&HDC update report, it showed the backlog performance at the middle of September 2024. This backlog performance report outlines the position at the end of September. Due to the short time between the two reports, some compliance areas don't show significant progress. All future reporting will show an end of month compliance position to ensure consistency in reporting.

2.3. Good progress has been made on the delivery of the backlog asbestos inspections to communal areas with the programme complete. Backlog reporting for asbestos and water safety (legionella) will be removed from future reports as both programmes are now complete.

2.4. Good progress is also being made in reducing the number of non-compliant smoke detection within homes. At the end of September this had reduced to 10,696 which is an improvement of 1,323 from the end of August 2024. There has also been a further reduction in backlog repairs from 7,412 at the end of August 2024 to 6,092 at the end of September 2024.

2.5. 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. Both areas are a significant focus for the H&CSP board and delivery teams. The damp and mould team is being impacted by difficulties with recruitment and retention of staff and the capacity of contractors.

2.6. The Business as Usual (BAU) landlord compliance performance reporting is outlined within Appendix Aiii metrics

## **3. Performance Update on Business-as-usual Landlord Compliance Performance Report– Appendix Aiii**

3.1. The landlord compliance performance report in appendix Aiii utilises a reporting format that has been suggested by the Regulator of Social Housing (RSH) to summarise the total business as usual compliance position. This includes the backlog compliance position reported to the RSH in the council's self-referral to the RSH and the current latest compliance.

- 3.2. The report was presented to the October 2024 H&CSP board for consideration. It is a detailed report that holds quite a bit of operational detail. The H&HDC is asked to comment on whether the format is useful to aid the committee's compliance oversight role or whether a more concise summary of performance in line with the backlog summary report in appendix Aii is preferred in future.
- 3.3. The report identifies good performance with; gas servicing, fire risk assessments, water safety, asbestos inspections to communal areas and passenger lift safety.
- 3.4. Areas that require further improvement are; electrical safety, fire remedial works and damp and mould. These areas have all been included in the backlog programme performance report in appendix Aii and summarised in section two. The stock condition survey programme had completed 3,746 surveys at the end of September. There have been concerns regarding the quality of some surveys and the programme was slowed down in October to allow the supplier to review surveys undertaken to date and improve the training of surveyors carrying out the stock condition surveys. The number of surveyors has been reduced to enable better management and monitoring of surveys undertaken. The supplier is still confident that the target of 8,000 surveys will be achieved by the end of March 2024/25.

#### **4. Root Cause Reviews Being Undertaken**

- 4.1. The council has commissioned a consultant (Newtrality) to undertake a review of the Repairs and Maintenance service. This includes a review of the target operating model and customer journey and will help us to better understand the root causes that have contributed to areas of non-compliance. The review will last 10 weeks. Resident representatives from the Housing Scrutiny Panel will meet with Newtrality to discuss the current repairs and maintenance review and feed into the customer journey mapping exercise.
- 4.2. The H&CSP board is holding a strategic root cause analysis session to be facilitated by Savills on 18 December 2024. Cllr Parsons and Cllr Eddy will also attend the session as Chair and Vice Chair of the H&HDC. The purpose of the session is to identify the high-level causes of the councils C3 regulatory judgement. The session will capture the identified root causes, their impact and actions required to respond to the root cause. Savills will also support with the setting of improvement benchmarks for each root cause identified.
- 4.3. An update on the session and draft strategic root cause document will be shared for comment at the February 2025 H&HDC.

#### **5. Draft Consumer Standards Improvement Strategy**

- 5.1. Appendix Aiv contains an initial draft of a consumer standards improvement strategy. This high-level document is being developed to summarise:
  - the background to the council's self-referral and C3 judgement against compliance with the consumer standards
  - a summary of the H&CSP, its objective and the improvement plan
  - how the council is prioritising improvement tasks

- a high level timeline of the delivery of the programme
- a summary of the governance arrangements for the programme
- how the council will gain verification and assurance on the delivery of the programme objectives.

5.2. The H&HDC is asked to comment on the initial draft consumer standards improvement strategy. The strategy will also be shared with the H&CSP board and the RSH for comment during November and December before being brought back to the H&HDC for approval in February 2025.

## **6. Feedback from the Housing Scrutiny Panel and Winter Housing Forums and resident engagement review**

6.1. The Housing Scrutiny Panel and Winter Housing Forums have discussed progress with the H&CSP and given feedback on the 1 November 2024 H&HDC meeting. A summary of the themes discussed at the meeting are outlined in table 01.

6.2. 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.

6.3. Proposals to expand resident engagement and oversight of the H&CSP are being developed and will be presented to the February 2025 H&HDC for consideration and approval.

<b>Table 01 – Feedback from November resident engagement meetings</b>		
<b>Summary of issue identified</b>	<b>Consumer Standards</b>	<b>What the plans are to respond to the issue / concerns</b>
Concerns relating to the need for a new Executive Director role and senior structure changes.	Transparency, influence and accountability standard	<p>Given our priority is to provide good quality housing for all and respond to the recent judgement report published by the Regulator of Social Housing, this is an investment we need to make. Bristol’s very high housing costs are one of the main drivers of our financial challenges and this additional leadership capacity will allow us to make the progress we need in addressing the city’s housing demand.</p> <p>The council is looking to make best use of existing knowledge, skills and experience by ensuring the Housing Services' structure is fit for purpose and has effective leadership that will have a strong voice for the needs of the council's social housing residents and the Housing service throughout the council and beyond.</p>
Concern around the use of consultants.	Transparency, influence and accountability standard	Consultants support the council by providing specialist advice and services to support existing teams. They also bring wider sector learning and good practice that can be used to improve the services provided. The council is using consultants in a targeted way and developing the skills and experience of directly employed colleagues to maximise the work that can be carried out internally.
Concern that the council may consider the transfer of its social housing homes outside of council ownership.	Transparency, influence and accountability standard	The council isn’t considering the transfer of its council homes to another organisation. The council is committed to improving the quality of homes and services that it provides.
Comments regarding the need for the council to listen to feedback and respond to the issues raised.	Transparency, influence and accountability standard	A new process is being introduced to ensure that resident feedback is reported regularly through the H&CSP and the H&HDC. We also plan on providing “you said we did” updates, and feedback directly to tenant engagement groups and forums to update on how their feedback has been implemented or considered.

Summary of issue identified	Consumer Standards	What the plans are to respond to the issue / concerns
Concerns that the council can be too focused on the delivery of maintenance works over the impact and experience of residents who are affected by the works.	Transparency, influence and accountability standard	The Newtrality review of the repairs and maintenance service includes a customer journey mapping exercise which will help the council to improve the experience of residents while works are undertaken to their home. The Repairs & Maintenance service will co-develop a customer charter for major projects with residents. We want to work with residents to ensure that any impact from maintenance works is minimised. We will always endeavour to give residents advance warning of maintenance works.
How residents are being kept informed on improvement works being undertaken.	Transparency, influence and accountability	We plan to keep residents updated about the changes and work that is taking place to improve the quality and safety of our homes. This includes information published on our website, communications published through our existing tenant channels such as Housing News and our social media, as well as offering more opportunities to engage and feedback face to face. For major projects, tenant liaison officers are employed to give updates to residents on projects progress.
The Housing Scrutiny Panel had an update on how the housing team are engaging with residents on a day-to-day basis and requested a regular update be brought to the meetings going forward.	Neighbourhood and community standard	The Head of Housing Management and Estates has agreed to bring a regular update to future Housing Scrutiny Panel meetings.
Concerns related to the speed of the cladding replacement programme.	Safety and quality standard	We are engaging with the government and WECA on the prioritisation and speed of the council's cladding replacement programme. We will accelerate the programme where possible.
A number of concerns raised regarding outstanding repairs, including damp & mould in resident's homes. Concern around the time it takes for repairs and maintenance to be carried out.	Safety and quality standard	The Repairs and Maintenance review will consider; the operating model, how repairs are delivered and the customer journey. The H&CSP is focused on improving the delivery of repairs, damp & mould and other landlord compliance areas.
A desire was expressed for more localised services.	Neighbourhood and community standard	We plan to design in collaboration with residents a locality plan that meets their diverse needs.
Some comments relating to how officers discuss issues at resident meetings. There was a preference to see more information in advance	Transparency, influence and accountability standard	The comments are being considered and we will work with residents to continually improve engagement and discussions within resident engagement meeting..

and have greater input into the direction of discussions.		
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## 7. Update on Engagement with the RSH

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

- questions related to aid and adaptations, damp & mould and HHSRS performance
- Data reconciliation
- A discussion on the repairs & maintenance review
- A discussion on the consumer standards improvement strategy development
- A discussion on the root cause analysis work.

### Officer Recommendations:

That the Committee for Homes & Housing Delivery

1. To note the Housing & Consumer Standards Programme (H&CSP) improvement plan summary
2. To note the H&CSP landlord compliance programme backlog performance report
3. To note the business-as-usual landlord compliance performance report
4. To note the 'root cause' reviews update
5. To note the draft Improvement Strategy
6. To note the feedback from the recent Housing Scrutiny Panel and winter Housing Forums
7. To note on the update from the latest regulatory review meeting with the Regulator of Social Housing (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 \(housing-ombudsman.org.uk\)](#))

<b>Revenue Cost</b>	N/A	<b>Source of Revenue Funding</b>	Housing Investment Plan Approved
<b>Capital Cost</b>	N/A	<b>Source of Capital Funding</b>	N/A
<b>One off cost</b> <input type="checkbox"/>	<b>Ongoing cost</b> <input checked="" type="checkbox"/>	<b>Saving Proposal</b> <input type="checkbox"/> <b>If yes - existing or new saving? OR Income generation proposal</b> <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. In line with monthly reporting to Homes and Housing Delivery Committee, there is a large forecast overspend in year 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 a significant forecast 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, 21 November 2024

2. **Legal Advice:** The report and updates in the appendices will enable the Committee to assess actions taken and progress made with 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, 22nd November 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 25 November 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 25 November 2024

## APPENDICES

<b>Appendix A – Further essential background / detail on the proposal</b>	<b>YES</b>
<ul style="list-style-type: none"><li>• Appendix Ai - H&amp;CSP Improvement Plan Update Summary (October 2024)</li><li>• Appendix Aii – Landlord Compliance Programme Backlog Compliance Performance Report (end September 2024)</li><li>• Appendix Aiii – Landlord Compliance business-as-usual performance report</li><li>• Appendix Aiv – Draft Consumer Standards Improvement Strategy</li></ul>	
<b>Appendix B – Equality Impact Assessment (EqIA)</b>	<b>NO</b>
<i>Note – The H&amp;CSP was included in the July 2024 update</i>	
<b>Appendix C – Environmental Impact Assessment (Environmental Impact Assessment</b>	<b>NO</b>
<i>Note – Propose to utilise the 2024/25 EIA as the activities that will impact an EIA remain the same although will be re-prioritised.</i>	
<b>Appendix D – Decision Risk Assessment</b>	<b>NO</b>
<b>Appendix E – Exempt Information</b>	<b>NO</b>
<b>Appendix F – Details of consultation carried out - internal and external</b>	<b>NO</b>
<b>Appendix G – Options appraisal matrix</b>	<b>NO</b>
<b>Appendix H – Business case / financial analysis</b>	<b>NO</b>