

Consumer Standards Review Findings Summary Presentation

Wolverhampton City Council

Aaron Keyte, Julian Paine & Christopher Smith - Savills UK Limited



A reminder....Review Purpose, Scope and Methodology



Review Purpose, Scope and Methodology

We were commissioned by Wolverhampton City Council (CWC) to provide advice and assurance on the Council's performance against the Regulator of Social Housing's (RSH) Consumer Standards.

The methodology included:

- Agreeing scope of review with CWC's Service Manager for Housing Strategy & Policy
- Reviewing key documents supplied by CWC and its ALMO Wolverhampton Homes (WH) to consider the extent to which CWC is able to obtain assurance of WH's compliance with the Consumer Standards
- Reviewing information published on WH's website to supplement our understanding of the organisation and its operating context
- Meeting with senior employees of WH to explore issues relating to compliance with the Consumer Standards
- Meeting with CWC's Service Manager for Housing Strategy & Policy to explore the operating context of and reporting mechanisms between WH and CWC.
- *Note – as WH manages the vast majority of CWC's stock, this review is focused primarily on WH/CWC documentation and discussions. However, the assurance principles discussed in this report can be applied equally to homes being managed by TMOs.*

Review Purpose, Scope and Methodology

All Registered Providers (RPs) are required to comply with the Consumer Standards which first came into force in 2012 and were republished in 2015. The Consumer Standards are short, outcomes-based standards which comprise:

- **Tenancy Standard** : Let homes and manage tenancies in a fair, transparent and efficient way
- **Home Standard**: Keep homes safe, decent and in a good state of repair
- **Tenant Involvement and Empowerment**: Understand and respond to the diverse needs of tenants, provide choice and opportunities for involvement, resolve complaints fairly and promptly
- **Neighbourhood and Community**: Keep the wider area clean and safe, help to tackle anti-social behaviour and promote community well-being

Currently the RSH's approach to regulating these standards is reactive. However, the Social Housing White Paper ('The Charter for Social Housing Residents') published in November 2020 has signalled the introduction of a proactive approach to the regulation of the Consumer Standards.



Regulator of
Social Housing

- CWC was registered with the RSH in April 2010 and remains accountable for demonstrating that it complies with the Consumer Standards despite having outsourced the management of almost all of its 22,000 social housing homes to WH, an arms length management organisation (ALMO).
- The RSH expects CWC to oversee the performance of WH and obtain sufficient assurance from WH to satisfy itself that the Council is compliant with the Consumer Standards.

CITY OF
WOLVERHAMPTON
C O U N C I L



- Our review is considered from the perspective of the regulator. The key question that we are seeking to answer is:

To what extent can CWC demonstrate that it has assurance that it complies with the RSH Consumer Standards in respect of Council-owned homes which are managed on its behalf by WH?

- As part of our review, we have also completed an evidence map against the required outcomes and specific expectations of the four standards. We have stated where there is evidence of compliance, and where improvement may be required.

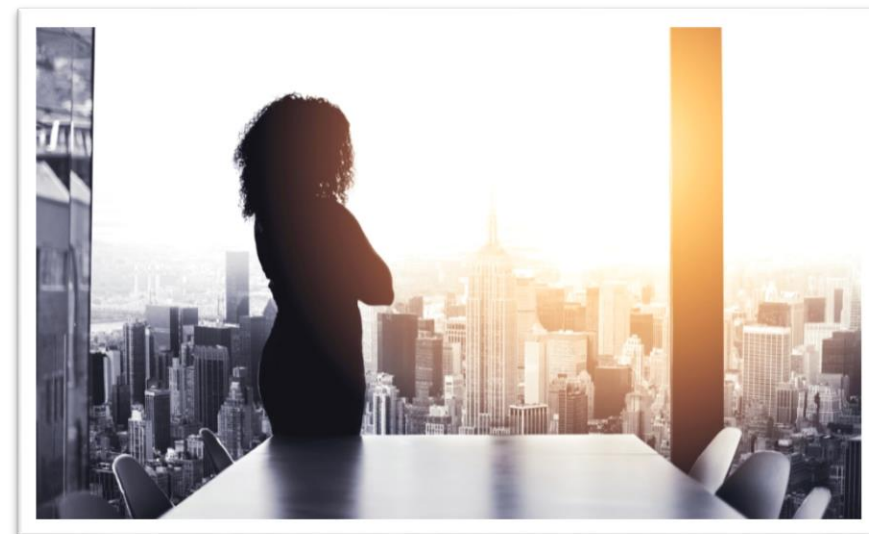


Overall Findings including Governance and Reporting Observations



Overall Findings

- For most areas CWC/WH has an adequate policy framework in place to ensure compliance against the RSH Consumer Standards, however, there are discrete areas that require material improvement primarily Repairs (part of the Home Standard) and Tenant Involvement and Empowerment.
- As discussed on the following slides, the range and content of information provided to Cabinet on a routine basis requires further development.
- Whilst not an explicit requirement of the Standards, in its Consumer Standards review, the regulator has recommended that Registered Providers should undertake regular self-assessments against the Standards.
- This is the first time WH/CWC has assessed its compliance with the Consumer Standards for a number of years. We recommend this is undertaken on an annual basis and reported to Cabinet to provide wider assurance on the framework in place to achieve compliance.



Governance Observations

- Governance of WH's performance and compliance against the RSH Consumer Standards is undertaken at the following groups:
 - The Joint Performance Operating Group (JPOG) - which is attended by key performance and client relationship staff from WH and CWC; and
 - The Better Homes Board (BHB) – which is a more strategic group, and attended by senior WH and CWC staff.
- Scrutiny of WH by the Council is primarily at the JPOG, where a wide range of KPIs are reviewed and performance discussed. The BHB also receive a dashboard of performance, however this covers the wider ambitions of the Council in delivering Housing in the Wolverhampton areas, and we understand the cross-over is relatively limited.
- The number of KPIs provided to the JPOG is vast (over 175). A subset of around 25 KPIs is also provided, however we understand the role of the group is to monitor and discuss all performance information. In our discussions with CWC and WH it is clear that the Council ultimately determines which measures are to be used and what appropriate performance is. However, this is done in a collaborative manner as far as possible.



Governance Observations (Continued)

- We discussed how Cabinet are sighted on higher-risk issues relating to Consumer Standards compliance, and we understand that this is provided to the Cabinet Member for Housing on a quarterly basis, and that they can then circulate the report to Cabinet if they wish. We have not reviewed a copy of this report, but would recommend that it contains a relevant subset of KPIs (linked to the higher-risk elements of the Consumer Standards) and is supported by a narrative report drawing out any key issues. We can assist in developing this report if required.
- We recommend that Cabinet is also supplied with this report on a routine basis, as the body accountable for governance, service delivery and ensuring WH meets the RSH standards. We understand that for a number of years the Cabinet has not received routine reporting in this area, and we consider this to be a material gap in being able to demonstrate to an external party (such as the RSH), that the Council understands the extent to which it is meeting the Consumer Standards or would know and be able to act in a timely way if there was a risk of non-compliance, potentially resulting in regulatory action.



Observations on WH Reporting

We have evaluated the quality and content of reporting between WH and CWC against the following higher-risk elements of the Consumer Standards and have the following findings:

- **Quality of Accommodation:** substantive, highly significant underlying, foundational issue with data integrity/assurance
- **Landlord Health and Safety Compliance:** need to ensure balance between initial activities and resulting remedial works/actions, plus increase assurance on data accuracy/integrity by the introduction of an additional 'Line of Defence'
- **Repairs & Maintenance:** sufficient profile for cost/efficiency (productivity) measures re VfM requirements as well as direct service delivery, and context of sector benchmarking
- **Complaints:** Reporting on complaints is clear in terms of monitoring responses in timescale and resolution at Stage 1. We understand that reporting of members' enquiries is to be separated from complaints reporting. Reporting would be enhanced by including commentary on the reason for complaints, the percentage upheld, the number escalated to Stage 2 and to the Housing Ombudsman, and the learning. We note, that the annual report to tenants includes some information on the reason for complaints.



Home Standard Landlord Compliance (Health & Safety)

Christopher Smith, Director



The Home Standard – Existing Requirements

There are two key categories of required outcomes of the Tenancy Standard:

- **Quality of Accommodation**
 - Decent Homes Standard as a minimum, Local Offers, any agreed period (with the Regulator of Social Housing) of non-compliance with this minimum
- **Repairs and Maintenance**
 - a cost-effective R&M service reflecting needs of, and offers choice to, tenants and emphasis upon completing repairs “right first time”
 - meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes

In respect to Landlord Compliance and Health and Safety, second aspect of R&M is the crucial one:

“...Registered Provider failures under the Home Standard in respect to regulatory findings of ‘serious detriment’ dominate the total (54%), and increasing proportion relate to Local Authorities (15 cases 2019-20, 7 by LAs)”

But a changed landscape, increased expectations....

- Inevitably, context of the Grenfell Tower Disaster cannot be ignored.....the ultimate ‘game changer’
- For Landlord Compliance/H&S, ‘traditional’, conventional approach of Gas and Fire-based reporting is no longer acceptable and indeed - in accordance with the Home Standard and its emphasis upon ***all*** of a landlord’s statutory requirements for Health and Safety – never really was.....
- RSH approach to Landlord Compliance/H&S, relative to the Home Standard, has been increasingly (and usefully) illustrated within its annual ‘Consumer Regulation Review’ Reports
- For Quality of Accommodation (i.e. Asset Management and Investment – AM/I), this has ‘mirrored’ Landlord Compliance/H&S in recent years with the Regulator’s focus increasingly on the evidence and assurance available that position relative to both the Decent Homes Standard and the planning of future Stock Investment (and Dis-Investment...) is based upon ***a foundation of sound, up-to-date Stock Condition Data*** which then shapes Strategic Priorities and subsequent Investment Planning (‘the Golden Thread’)
- Significant additional pressures upon prioritisation of Stock Investment resources – further increasing premium upon targeting via up-to-date data – via twin factors of Landlord Compliance/H&S (in particular Fire Safety – as directly relevant to the Home Standard) and Energy Efficiency/Decarbonisation

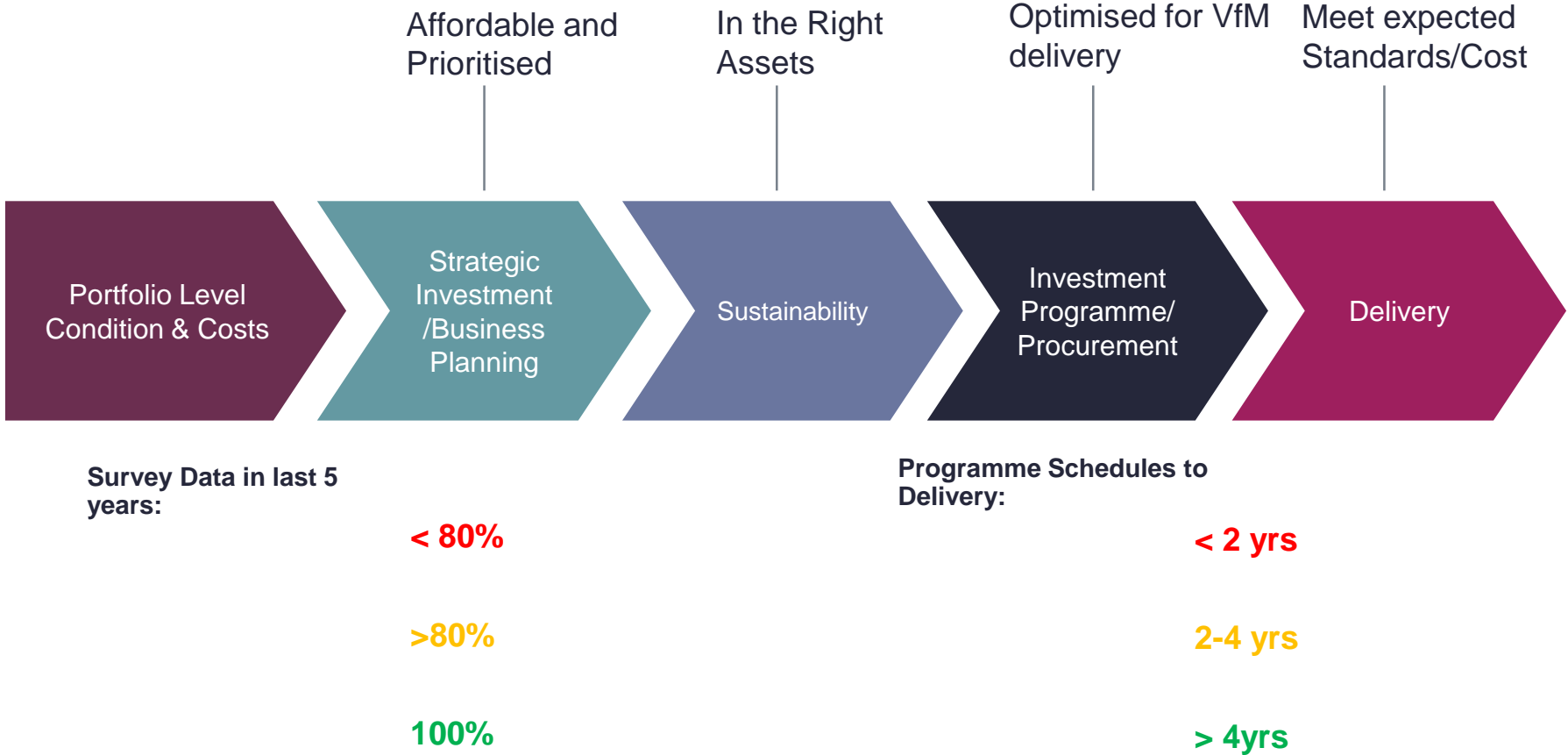
Home Standard (AM/I) Findings

- ✓ **Some very clear and significant positives in this area:**
 - Initial attainment, subsequent maintaining, of Decent Homes Standard clearly the focus for previous AMS period – and subject to routine monitoring via KPI suite ALMO to Council
 - Outline, Draft replacement AMS (Year 2022-2026) shows elements of sound, ‘evolutionary’ thinking which picks up the substantial elements from the changing landscape as just mentioned, including:
 - Wider Stock Performance/Sustainability (in particular Non-Traditional Construction Units)
 - Zero Carbon
 - Building Safety
 - Latter would represent continuance of clear track-record to date of prioritising tenants/residents safety as reflected in work on infrastructure (e.g. removal of gas from all High-Rise schemes), enhanced fire safety works (retrofit sprinklers, external works et al)

Home Standard (AM/I) Findings

- **However, fundamental and underlying issue which would be almost certain to raise substantial regulatory concerns** – relates back to increased/ing focus on evidence and assurance of current Stock Condition position and this as a sound basis for further and future Stock investment:
- Major, long-running systemic issues with non-functionality of WH's Promaster Asset Database – organisation itself concedes it cannot demonstrate/evidence the aforementioned 'Golden Thread'...
- ...broken by data quality and reporting issues so severe WH unable to rely upon this – and the Stock Condition Data therein – to produce Investment scenarios/options to produce 30 Year Investment Plan or test affordability re Building Cost Report (i.e. actuals)....instead iterative, assumption-based methodology
- This extends to understanding of Decency position – especially re roofing and thermal efficiency key criteria....real-life manifestation within works delivery for these two elements
- 'Perfect Storm' as more resources drawn into attempting to resolve – and then implementation from May 2020 of agreed solution (new System – Northgate Assets Module) which was near to completion at time of our fieldwork – has significantly reduced capacity for further Stock Condition Survey work
- Whilst solution being implemented, no external, independent oversight, scrutiny to ensure this is effective and addresses key fundamental requirements of a Good Practice approach....a key priority for post-implementation

Good Practice for Investment



Home Standard (Responsive Repairs) Findings

- ✓ **Some real positives and indications of Home Standard compliance here:**
 - Clear, documented Service Office in place ('Repairs Policy 2020-22') – recently revised, features clear, succinct Service Standards, details of relative Landlord/Tenant responsibilities and this extends to Empty Homes (Void) Works Standard
 - Service subject to Improvement/Transformation Programme ('Magnus') – and good to see Customer Service Delivery and Quality issues as main driver and focus for expected outcomes
 - Customer-facing KPIs extensive within current Framework across all categories, appointments et al – and good that background, internal (i.e. to WH only) indicators also operating in customer interest (e.g. repairs within 4 weeks of void, Job Cancellation Codes)
 - As well as demarcated/segregated KPIs, all WH Staff strongly aware and knowledgeable of service delivery variations and requirements of the TMOs
 - Strong evidence of excellent co-operation with the Council and other agencies re Aids and Adaptations Service – and visibility within KPI suite (P-AA1)

Home Standard (Responsive Repairs) Findings

- **However, also some improvement requirements relative to the Standard:**
- Appears to have been shortfall in formal tenant consultation on revised R&M Policy 2020-22 for such a key, core service and Standard's emphasis on tenants choice
- 'RFT' as central focus for Service Delivery only emerged very recently as significant, explicit KPI requirement for current 2021-22 Year (P-R4), despite presence in Standard since 2015 and Regulator focus
- Relative to VfM requirements, emphasis of the Standard – current KPI reporting very light on content re costs and efficiency/productivity (though ICT System/Reporting limitations behind this should be resolved during course of 2021-22 and increase capacity/capability in this respect)
- Performance position does appear moderate-poor across main volume KPIs to Q3 2020-21 against usual benchmarks, but note and fully acknowledge coronavirus context for this re difficulties of delivering improvement in these circumstances/environment

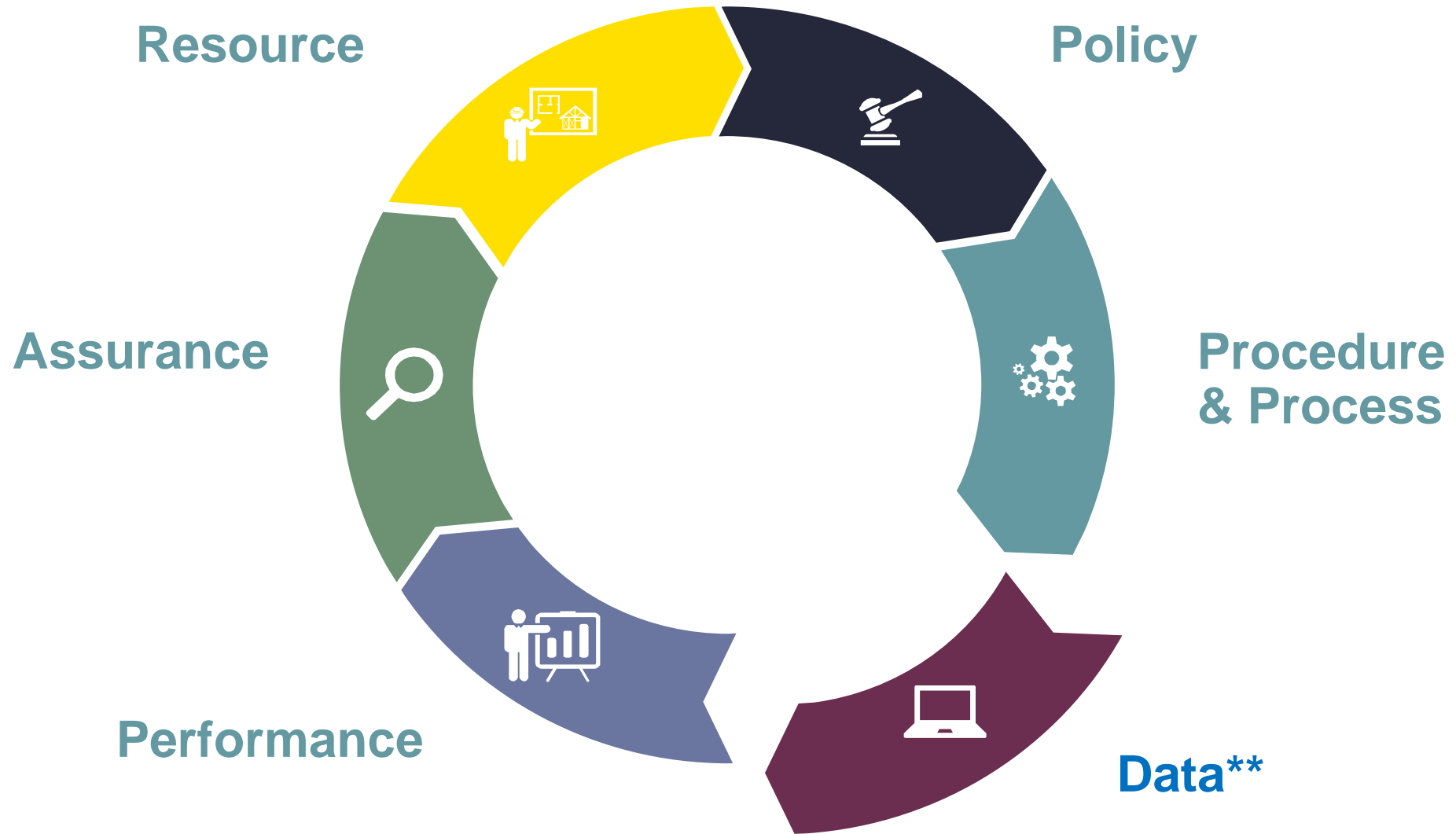
Home Standard (Landlord Compliance) Findings

- ✓ **Some very strong indications of a robust, fit-for-purpose approach to Landlord Compliance and tenants Health and Safety operating at Wolverhampton Homes – with performance in this area the strongest of the 3 ‘strands’ under the Homes Standard:**
 - Comprehensive Portfolio of **Policy** documentation across the ‘Big 6’ (Gas, Electrical, Fire, Asbestos*, Water, Lifts) in place which articulate the organisation’s approach (*still in draft at time of fieldwork)
 - Backed-up with substantial portfolio of **Process/Procedure** covering and providing detail on operational delivery
 - Consciousness/awareness of **Data integrity/accuracy/consistency** – very positive to see Landlord Compliance KPIs prescribed within written Calculation/Methodology Sheets
 - Strong representation of Landlord Compliance KPI **Reporting** within both WH and between WH and the Council as related to initial Servicing/Inspection/Risk Assessment activities
 - Good balance of internal and external (independent, external third-party) **Assurance** activities
 - Landlord Compliance clearly benefits from a strong focus at WH and a commensurate level of Staffing Resource is devoted to this – including clearly highly experienced, knowledgeable Head of Compliance.

Home Standard (Landlord Compliance) Findings

- ✓ **Still some opportunities for further improvement and strengthening of the approach – particularly in respect to evidencing and enhancing the level of confidence/assurance that all obligations and requirements are being met:**
- Operation of additional ‘Line of Defence’ re secondary checking, sampling of KPI data before it is included in Reporting – currently produced at operational level and proceed unchecked/unvalidated into KPI Reports – in order to provide separate, quasi-independent validation of data integrity/accuracy (i.e. separation of duties)
- In particular as mixed position in place at WH with some areas still managed via Excel Spreadsheet (Fire, Water, Lifts) and so *manually updated* re changes in the Housing Stock as no automated, system-based linkage/interface with Northgate Master, Core System – would benefit from fully documenting processes/procedures followed for this updated re the how, plus ‘who, what, when and why’provides an auditable, routine standard against checks on accuracy/integrity can then be made
- Of most importance, priority – all current reporting (WH and WH-Council) is heavily focussed upon initial Servicing/Inspection/risk Assessment activities, and with exception of Fire and Asbestos (in WH ‘Big ‘ Report) significantly omit and neglect confirmation of the status of any follow-on Remedial Works/Actions....significant recent examples in the sector of Electrical Remedial Works (C1, C2s) leading to self-reporting to the Regulator and subsequent regulatory engagement....

An Effective Landlord Compliance System/Framework



“...reporting is a critical part of ensuring effective oversight of health and safety. It also enables providers to evidence compliance with the consumer standards. In a number of cases, the regulator has seen that a failure by registered providers to maintain good quality data about the homes where their tenants live, means they may not know what is needed in terms of statutory checks or remedial work.”

(Consumer Regulation Review 2019-20 Page 9)

Tenancy Standard

Aaron Keyte, Associate Director
Julian Paine, Senior Consultant



Tenancy Standard – Existing Requirements

There are two key categories of required outcomes of the Tenancy Standard:

- **Allocations and Mutual Exchange**

- Homes shall be let in a fair, transparent and efficient way. Taking account of housing need, and aspiration of tenants and potential tenants.
- RPs shall enable their tenants to gain access to opportunities to exchange their tenancy with that of another tenants, by way of internet-based mutual exchanges services.

- **Tenure**

- RP's shall offer tenancies or terms of occupation which are compatible with the purpose of the accommodation, the needs of individual households, the sustainability of the community, and the efficient use of their housing stock.
- All applicable statutory and legal requirements in relation to the form and use of tenancy agreements or terms of occupation should be met.

Tenancy Standard - Allocations and Mutual Exchange

Overall there is a good evidence base that there is a framework in place to achieve the required outcomes relating to Allocations and Mutual Exchange.

- CWC has a recently approved (August 2021) Housing Allocations Policy. It sets out the responsibility of all managing agents to make allocations in line with this policy, and sets out its homelessness duties and how this is included within prioritisation banding.
- As per the Housing Allocations policy, in order to assist applicants to explore housing options, receive financial guidance on sustaining a tenancy and understand the rights and responsibilities of being a tenant applicant may be asked to complete a pre-tenancy exercise before their application is made live. Applications may not be made live until applicants have completed the exercises. Applications are managed through 'Homes in the City' which is administered by WH.
- CWC is subscribed to 'HomeSwapper' which is an internet based mutual exchange website. This is a free services for tenants, which allows a tenant to enter their current property details, their requirements for the property they hope to obtain, and that property details are provided to the tenant where a match occurs.
- The Consumer Standards require providers to provide reasonable support to tenants who do not have access to the internet and who wish to undertake a mutual exchange. Whilst in practice, support can be offered, WH can enhance compliance with the Consumer Standards by promoting the availability of support.



Tenancy Standard - Tenure

- The letting of WH properties is covered in comprehensive policies, including the types of tenancies that will be granted, the length of those tenancies, appeals, advice, successions and assignments.
- Whilst there isn't a formal eviction policy, it is possible to understand WH's approach to evictions through:
 - The 'Arrears Prevention and Management' policy which seeks to ensure prospective tenants receive guidance in relation to:
 - costs involved in running a home
 - ways to pay rent and other charges
 - arrears recovery policy and procedures
 - sources of financial assistance and debt advice
 - ensuring awareness of the link between the rents paid to the Council and the provision of housing services
 - And, the 'Rents Income Management Policy' which seeks to:
 - help tenants to sustain tenancies where possible and prevent homelessness due to non-payment of rent; including but not limited to Housing Options Homeless Prevention Team, Housing Support, Strengthening Families and MASH.
 - encourage customers to maximise their income by providing advice on Welfare benefits to include universal credit and any other benefits which may apply.
 - provide support and advice to enable customers to pay their rent, reduce any debt and to sustain their tenancies



Tenant Involvement & Empowerment Standard

Aaron Keyte, Associate Director
Julian Paine, Senior Consultant



Tenant Involvement and Empowerment Standard – Existing Requirements

There are three key categories of required outcomes of the Tenant Involvement and Empowerment Standard:

- **Customer service, choice and complaints**
 - Provision of choices, information and communication that is appropriate to the diverse needs of their tenants in the delivery of all standards.
 - An approach to complaints that is clear, simple and accessible that ensure that complaints are resolved promptly, politely and fairly.
- **Involvement and empowerment**
 - RP's shall ensure tenants are given a wide range of opportunities to influence and be involved in the scrutiny of a landlord's performance, the making of decisions about how housing-related services are delivered. (Other areas of potential influence include management of homes, repairs and maintenance as appropriate, as well as the formulation of landlord housing-related policies and strategic priorities)
- **Understanding and responding to the diverse needs of tenants**
 - RP's shall treat all tenants with fairness and respect, and demonstrate that they understand the different needs of their tenants.



Customer Service and Choice

- WH's website contains clear information about core services and how customers can access them. It also includes signposting to a range of support services provided by both WH and other agencies.
- A range of information is provided on 'My Tenancy', including tenancy agreements, tenants' rights and responsibilities, tenancy breaches, and how to end/transfer a tenancy.
- The Customer Annual Report for 2019-2020 has recently been published , and includes a range of performance measures against customer and support, community wellbeing and safety, repairs and maintenance, lettings and new homes, and how money was collected/spent.
- Customer survey results for 2020-21 are published on the website and show that 75% of customers are satisfied overall with WH.



Tenant I&E Standard- Customer Service, Choice and Complaints

Complaints

- WH has a 2020-21 Complaints Policy that is published on its website. It clearly states the authorisation route (CSD Committee) and the next review date (2022).
- Complaints can be made in a number of ways including through website enquiry, webchat, social media, email, telephone and in writing.
- Services standards are clearly stated within the policy, as well as the 2 Stage Complaint process and the option to escalate to the Housing Ombudsman if a complaint remains unsatisfactorily resolved.
- Whilst the Customer Policy states that learning from complaints will shape improvements to services and procedures, and improvements will be reported by the Senior Management Team each quarter. It is unclear from our review how and where this is undertaken.
- We were advised that WH undertook a self-assessment against the complaints handling code, as required by the Housing Ombudsman. However, we have seen no evidence to confirm that the results have been published. This is one of the Ombudsman's expectations.
- Reporting on complaints is clear in terms of monitoring responses in timescale and resolution at Stage 1. We understand that reporting of members' enquiries is to be separated from complaints reporting. Reporting would be enhanced by including commentary on the reason for complaints, the percentage upheld, the number escalated to Stage 2 and to the Housing Ombudsman, and the learning. We note, that the annual report to tenants includes some information on the reason for complaints.



Tenant I&E Standard - Involvement and Empowerment

Improvements are required to strengthen CWC capacity to evidence the required outcomes relating to (Tenant) Involvement and Empowerment.

- The current mechanisms for achieving tenant involvement and empowerment appear to be limited and ad-hoc. We were not able to evidence a systemic approach to engagement, or that tenants had been consulted in last 3 years (as is a specific expectation of the Standards) on the best way of involving them in governance and scrutiny of WH's housing management service.
- WH/CWC have a jointly drafted Customer Experience Strategy that seeks to set expectations on Housing more generally, but to also set out how the involvement and empowerment of tenants can scrutinise and shape the services they receive. The document however appears to have been in draft for some time following the departure of key staff.
- To address this, we understand that the draft Customer Experience Strategy will be refreshed to ensure it is relevant and speaks to the outcomes of the SHWP, and that it will be developed in consultation with tenants.



- There is a strong thread of understanding the different needs of tenants and seeking to act with fairness and respect, through review of the website and through the range of documentation commented on elsewhere in this report and in the Evidence Map.
- The WH website, in particular, provides clearly signposted information which enables a wide range of services to be accessed and support needs to be addressed.
- This includes safeguarding links, financial inclusion and access to the home improvement agency services.
- The website also maximises its accessibility through the inclusion of the ReciteMe tool.
- Low level support is provided by Tenancy Officers; additional support (which is tenure-neutral) is available via the housing options service.



Neighbourhood & Community Standard

Aaron Keyte, Associate Director
Julian Paine, Senior Consultant



Neighbourhood and Community Standard – Existing Requirements

There are three key required outcomes of the Neighbourhood and Community Standard:

- **Neighbourhood management**
 - Keep neighbourhood and communal areas associated with homes clean and safe. Working in partnership with tenants and other providers and public bodies where it is effective to do so.
- **Local area co-operation**
 - Co-operate with relevant partners to promote social, environmental and economic wellbeing in the areas where homes are owned.
- **Anti-social behaviour**
 - Work in partnership with other agencies to prevent and tackle ASB in the neighbourhoods where homes are owned.



Neighbourhood & Community Standard

Neighbourhood Management:

- WH has a wide range of procedure documents setting out the approach to ensuring neighbourhood and community areas are safe and clean, however none appear to have been reviewed since 2017. We recommend that all policies and procedures are reviewed on a more regular basis to ensure they remain fit for purpose, and that a programme for renewal and approval is established and reported against annually.
- If high rise flats exist, we recommend a procedure note for inspection is created.
- We have not seen information which shows customer perceptions about neighbourhood and communal area management.
- Wolverhampton Homes / CWC do not appear to have a published policy that sets out the overall framework for maintaining and improving the neighbourhoods associated with their homes. We recommend that this is developed in consultation with tenants.



Local area co-operation:

- There is evidence to WH's local area co-operation – for example its strong relationship with CWC, as well as partnership working with DWP, Strengthening Families, MASH (multi-agency safeguarding hub), West Midlands Police, welfare benefit advice services, and legal/payment collection services.

Neighbourhood & Community Standard – Anti Social Behaviour

Overall there is a good evidence base that there is a framework in place to achieve the required outcomes relating to Anti Social Behaviour

- WH is responsible for delivering a tenure-neutral ASB service on behalf of CWC. Its approach is set out in the ASB Policy, dated April 2021.
- As part of issuing a tenancy, we understand prospective tenants are required to pass pre-tenancy modules, which set out rights and responsibilities, and if required, additional face-to-face or telephone support is provided. All new tenants are subject to introductory tenancies, which can be extended where there are continuing doubts about the conduct of a tenant.
- WH undertakes a range of early and formal interventions, including verbal/written warnings, acceptable behaviour contracts, support and counselling, and surveillance. Legal actions include civil injunction, criminal behaviour orders, closure orders, community protection notices, public space protection orders, and Section 222 injunctions.
- WH's website provides a significant amount of useful advice and information for customers. It has a specific page for reporting anti-social behaviour, clearly signposted from a 'Help and Support' button. There are text boxes in place to report the details of an incident, the location, the persons involved, and the Case ID (in the event it is linked to a previous report). The reporter can remain anonymous if they wish.



Neighbourhood & Community Standard – Anti Social Behaviour

- A Statement of Policy and Procedures of Anti-social Behaviour, dating from 2016, sets out a range of support for victims and witnesses. It also recognises that young perpetrators can experience problems with their family and school due to their behaviour, and that it may be necessary to contact their school or Social Services. Where an adult perpetrator has identified support needs a referral to a support agency should be made. It is unclear whether this document remains valid given the publication of a new ASB Policy in April 2021.
- Useful information for people experiencing domestic abuse is clearly signposted on the WH website. This includes access to support services. We have not seen evidence of a policy which sets out WH's approach to dealing with domestic abuse, though the new ASB Policy covers incidents of domestic abuse.
- The new ASB policy is silent about how WH will deal with perpetrators of ASB. This is important because ASB can be linked to a perpetrator's vulnerability and support either instead of, or in addition to enforcement action may be appropriate.
- WH's 'Management of Tenancy Breaches' procedure is at least five years old. We recommend it is reviewed and updated to ensure it is in line with current practices and requirements.



Summary of Recommendations



Summary of recommendations

- Undertake annual self-assessment of compliance against the Consumer Standards (Slide 8)
- Improve regularity and form of reporting to CWC Cabinet (Slide 10)
- Issues relating to evidence and assurance on current Stock Condition information (Slide 16)
- Issues relating to R&M including tenant consultation and performance reporting (Slide 19)
- Improvements to reporting on Landlord Compliance (Slide 21)
- Improvements to reporting on Complaints (Slide 31)
- Strengthening of approach to Tenant Involvement and Empowerment (Slide 32)
- Refresh of Neighbourhood Management Policy and procedures (Slide 36)
- Refresh of 'Management of Tenancy Breaches' procedure (Slide 38)



Thank You



Any Questions?

