

LONDON BOROUGH OF CROYDON

REPORT:	CABINET
DATE OF DECISION	25 October 2023
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 quarterly update to Cabinet in July 2023.
- 1.2 The breadth of work within the Housing Transformation Programme has continued to progress since the previous update, with 31 projects currently live and 14 projects closed following completion.
- 1.3 This paper 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:

- 2.1 To note the progress since July 2023 on the Housing Transformation Programme.

3 REASONS FOR RECOMMENDATIONS

- 3.1 To provide the Executive Mayor and his 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 meet its best value duty.

4 BACKGROUND AND DETAILS

- 4.1 In March 2021, an ITV media show exposed the living conditions endured by residents of the Regina Road Estate in South Norwood, who were residing in social housing properties owned by the London Borough of Croydon (LBC).
- 4.2 Subsequently, LBC commissioned a diagnostic report to investigate the underlying issues and failings that led to these poor conditions. Simultaneously, the Council made a self-referral to the Regulator for Social Housing (RSH) for breaching the consumer standards.
- 4.3 In May 2021, LBC was served a regulatory notice by the Regulator for Social Housing for breaching both the Tenant Involvement and Empowerment Standard and the Home Standard.
- 4.4 In response to these regulatory challenges and the pressing need for comprehensive improvements, the Housing Transformation Programme was created. This programme has been developed to transform the services provided by the Housing Directorate to our residents and provide a roadmap of the return to Compliance to the Regulator for Social Housing.
- 4.5 The Housing Transformation Programme is a multi-year initiative, expected to span three to five years, delivered in phases, with ongoing project evolution and workstream refinement as it progresses to ensure a sustainable and lasting transformation of the Croydon's housing services.
- 4.6 Cabinet noted and approved the programme in December 2022, following its strengthening to address previous criticisms. The progress of the programme is to be noted quarterly and was previously noted at July 2023 Cabinet.
- 4.7 In total there are 8 workstreams and 72 projects that make up the programme, with an additional 5 projects having been added since the previous update. The programme workstreams and projects therein are shown in Appendix 1.
- 4.8 Projects with high impact such as Regina Road and the repair re-procurement are brought to Cabinet via the normal processes, whilst also receiving scrutiny from the Housing Improvement Board and, when applicable, the Regulator of Social Housing (as appropriate).

4.9 The Transformation Steering Board continues to run monthly. Significant projects such as Regina Road and the Housing Needs workstream have additional steering boards to oversee their progress and decision-making.

4.10 There have been a number of key achievements since the most recent update on the programme in July 2023.

- Voluntary Undertaking: The Council has submitted their voluntary undertaking to the Regulator for Social Housing. This document sets out a detailed plan to address compliance recovery which form part of the transformation programme.
- 1.3 Development of new Housing Strategy 2023- 2028: A seven-week consultation and focused engagement sessions including a presentation the Tenant & Leaseholder panel have been completed. Focus groups were also held with residents and partners, housing associations and private rented sector landlords. The Strategy will now go to December Cabinet for approval.
- 1.5 Changes to Leadership Team: The Directorate has established a new senior leadership structure, with a number of Director posts currently advertised. Permanent recruitment is key in strengthening and improving the capacity of the leadership team to ensure that transformational improvements are effectively driven.
- 3.2 Resident Engagement Strategy: The Directorate continues to engage with tenant involvement specialists, TPAS, to further develop the strategy, with an action plan currently under development. The strategy is due to come to December Cabinet for approval.
- 3.8 Customer Learning & Review of Process: A new Customer Insight Manager has been recruited to address the approach to and backlog of complaints. The Manager has engaged with the new contractors and defined a process for addressing complaints with them. The legacy complaints are being addressed actively.
- 3.15 NEC Migration: The implementation of customer interface and asset management system (NEC) has enabled transformation of data collection and replaces previous disparate systems. NEC is in the final stages of data and system reconciliation. Housing online is now live and residents are able to access the online portal. Change management workshops have been held (and will continue to be held) to address change in processes and behaviours required as a result of the new system.
- 4.1 Regina Road Phase 1: Phase 1 of the delivery programme for Regina Road is underway. Voids are being used to decant properties, with the preferred timeline remaining a start on site during December 2024.
- 4.3 Asset Management Strategy: The stock condition survey has delivered 23% of surveys by the end of September 2023. This work is key in underpinning the HRA business plan and asset management strategy which is currently being developed. The strategy is due for approval at March 2024 Cabinet.
- 6.1 Repairs Contract Re-Procurement: Three new contractors have been successfully mobilised and are now providing our repairs. The three contractors are Mears (providing repairs, maintenance and empty property works to homes in

New Addington, Fieldway, Shrublands and Monks Hill), Wates (providing repairs maintenance and empty property works to all other council homes across Croydon) and K & T Heating (providing heating services, including boiler repairs and servicing to all council homes). Wates are also providing our out-of-hours emergency repairs service. A new Contract Management Hub has also been established and a Social Value officer is working to ensure that social value commitments made through tendering are delivered appropriately.

- 6.2 Repairs Contact Centre: The repairs contact centre has now been brought in-house and successfully launched to give the council a more direct, responsive relationship with tenants. The data so far suggests that it has been working well with 80% of calls answered within 20 seconds. The out of hours provision is also live and working well.
- 6.6 Review of Policies and Procedures: A number of policies are in development, with the tenancy management, void management, and decant policies having been drafted.
- 8.1 Housing Needs Restructure: The Housing Needs and Homelessness restructure has gone live and staff are being supported across the directorate to embed the structure. The restructure has been designed to ensure the service is more proactive and focused on early intervention.
- 8.4 Homelessness Prevention and Rough Sleeping Strategy: The Homelessness Review as a prerequisite to the development of the strategy is underway, with an initial draft completed. Work to develop the consultation approach is well underway, with external consultation expected to start in September 2023. The strategy aims to provide strategic direction to the homelessness service including the establishment of joint-working protocols with internal and external partners. A review of rough sleeping pathway and submission of Ending Rough Sleeping plan to DLUHC has also been completed and expertise has been commissioned to conduct a review of Rough Sleeping Initiative funding.

4.11 A total of 31 projects across all of the 8 workstreams are now live.

4.12 The progress to date for each workstream is detailed below. RAG-ratings have been provided for each of the projects in the left-hand column. Red indicates that the project is not on track and requires an immediate intervention to plan to return to committed deadlines. Amber indicates that the project is not on track but does have a plan to ensure it delivers the agreed outcomes by committed deadlines. Green indicates that the project is on track to deliver the agreed outcomes by committed deadlines. Please note that the projects are constantly progressing and may change in RAG status from the point of report submission to Cabinet meeting.

Vision, Direction & Transformation Plan for Housing Directorate

1.3 Housing Strategy	The Housing Strategy has been developed and consulted on via an online survey, presentation to the Tenant & Leaseholder panel. Focus groups were also held with residents and partners, housing associations and private rented sector landlords. The strategy has
-----------------------------	--

	been amended following consultation and will go to December Cabinet.
1.5 High level re-structure and recruitment	Recruitment for the high-level senior management positions has begun, with three senior Director posts having now entered the recruitment process.

Governance & Information Management

2.1 Revised Performance Framework and Business Intelligence	The draft KPI dashboard was shared at the August Performance & Risk Housing Improvement Board session. This framework will set out clear measures of performance for service areas and enable appropriate objective setting for staff, projects and initiatives, with a focus on customer services.
---	---

Customer Excellence

3.2 Resident Engagement Strategy	The Resident Engagement Strategy will set out how residents will be engaged in decision-making, information-sharing and consultation. The Directorate continues to work with TPAS to develop the strategy further. An action plan is being developed following completion of the self-assessment exercise. Once the paper has been developed following completion of discovery and design stages, it will be reviewed by a wider group of residents. The strategy is due to be presented to Cabinet in December.
3.4 Customer Information review	The customer information review continues to progress, with a Tenancy Audit process in NEC underway and work to implement the action plan. A new project has been created to determine that changes to data collection are instigated. The project has been extended to November 2023 to ensure it feeds into the new operating model. The review aims to evaluate the information captured for customers, profiling customer information, ensuring characteristics are used to inform communication channels and service delivery.
3.5 Customer journey review	The project intends to co-review our resident's pathways through housing services to create and inform a new operating model and deliver a fit-for-purpose website. All discovery workshops and interviews have been completed. These sessions have been conducted to gain a holistic understanding of the problem and needs of users. Feedback sessions have taken place including identification of top problems. Clarification with problems identified in correlation with contact centre information is to take place.

3.7 Customer Service Training	A customer care training provider has now been selected and will shortly enter design phase. Once delivered training will transform customer interactions through a programme of training focused on behaviour and creating a positive customer experience.
3.8 Customer Learning & review of process	Our new customer insight manager is continuing the work on our backlogs and ways of working and is looking to address inefficiencies. They have identified the key areas to inform an action plan, including new contractors picking up legacy works, new staff training, new processes.
3.9 “Stop Social Housing Stigma” Campaign	The project aims to confront and dispel negative stereotypes about tenants, ensuring equitable access to housing services for all residents and fulfilling the commitment outlined in the Resident's Charter to ensure respectful treatment of residents. Organisers of the campaign are in the process of setting out their offer to invite organisations to take part in the pilot scheme they are rolling out. The Tenant & Leaseholder Panel (TLP) chair and committee member of SSHS, has provided updates that progress is being made with regards to a formal offer.
3.10 Review of Consumer standards	LBC have submitted their voluntary undertaking following a number of conversations with RSH. An action plan is currently being developed in response to an overall audit of the consumer standards. Work is also underway to assess and undertake a gap analysis against proposed new consumer standards to demonstrate an understanding of the evidence required for the regulator.
3.12 Know our Neighbourhoods programme & Estate Inspections	Since June 2023 the Housing Directorate have been working with Sustainable Communities to develop a ground maintenance service level agreement, to improve the delivery of services to residents. Following agreement with the Caretaking Task and Finish group, Housemark estate services photobook procurement has commenced. Tenants will take part in agreeing pictorial standards to assist in improving cleaning standards. Testing also took place over July for estate template including property structure, users and grading.
3.16 NEC Post Go-Live Product Development	This project intends to ensure successful development and adoption of the NEC system following it going live in June 2023. NEC is currently scoping phase 2 of mobilisation which establishes additional functionality and improvement to processes. Workshops have been held to embed consistent practices for using NEC and responsibilities for specific stages in business processes and handover between services has been clearly defined. Support has also been provided in the initial stages of the Repairs Mobilisation

project. Housing online is now live and residents are able to access their online rent accounts via the online portal.

Long-term Homes & Neighbourhood Planning

<p>4.1 Resolution programme for Regina Road.</p>	<p>This project addresses the existing inadequate conditions at the Regina Road estate, where three aging tower blocks require substantial improvements to meet the standards of contemporary social housing in the 21st century. Phase 1 is currently being redesigned to consider the north side of Regina Road as a better site. Voids are being used to decant properties, with the preferred timeline remaining a start on site at Regina Road during December 2024.</p>
<p>4.2 Resolution programme for LPS blocks</p>	<p>This programme addresses the future of the ageing LPS tower blocks across the Borough where action is needed to ensure modern social housing fit for the 21st century. This excludes 1-87 Regina which is being decanted for demolition. Engagement sessions have been held with all LPS blocks. Attendance has been variable from no attendance on 1 block up to about 25% attendance on others. The Stage 1 structural investigation report is due in early October and the final structural appraisal report anticipated in Summer 2024. Various surveys are required over the coming year to gather more information to support the Building Safety Act. Residents who attended the resident engagement sessions will have been informed that surveys are planned and that we will inform them prior. An update paper on LPS will be coming to October Cabinet.</p>
<p>4.3 Development of Asset Management Strategy</p>	<p>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. A review of stock data is taking place and is due to complete a minimum of 33% of surveys by the end of December. This information is also being triangulated with repairs surveys. The strategy is due at Cabinet in March 2024.</p>
<p>4.4 Estates and Improvement restructure</p>	<p>Initial design conversations are underway. 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. A new director post for this area has gone out to advert. This restructure will be aligned to the restructure occurring in landlord services.</p>

Asset Compliance

5.1 Compliance plan for Fire Safety Act 2021	Initial responses and arrangements are in place against all the requirements. Our information and arrangements are being developed over the coming months, with the target to have met all requirements by the end of January 2024. Examples of this are improving building floor and block drawing plans, re-sending safety information to residents, collecting more detailed external wall information through surveys required under the Building Safety Act.
5.2 Compliance plan for Building Safety Act	A project has been scoped which includes structural surveys and retrospective fire strategies. There is also a continuation of assistance being provided to the Fire Safety team to audit the contents of premises information boxes and provide suitable building and floor plans. We are well prepared for registering all high-risk buildings at the end of September and inputting key building information into the Regulator's portal by the end of October 2023. We are in the process of procuring a number of services to support us to meet requirement of the Building Safety Act including fire engineering, structural and safety case expertise.

Maintaining our Homes

6.1 Repairs re-procurement / mobilisation	<p>The new contracts were successfully mobilised on the 1st August, with three new contractors now providing repairs. Mears are providing repairs, maintenance and empty property works to homes in New Addington, Fieldway, Shrublands and Monks Hill. Wates are providing repairs maintenance and empty property works to all other council homes across Croydon. Wates are also providing our out of hours service. K&T Heating are providing heating services, including boiler repairs and servicing, to all council homes.</p> <p>All contractors have now been integrated with our NEC system. Works has begun on creating an NEC repair finder with interfinder to be implemented in phase 2 of the NEC project.</p>
6.2 Repairs Contact Centre	LBC's in-house repairs contact centre went live on the 1 st August 2023. The launch has so far been successful, with the volume of calls being taken, at a much higher level than had been anticipated. Creating this direct and more effective communication channel will enable LBC to own initial relationships between customers and the repairs service.
6.3 Repairs restructure and	The project is closely aligned with the Repairs Mobilisation and includes the resourcing of contract management skills to ensure

behaviour change programme	effective repairs mobilisation as well as the re-engineering of practices to support better customer delivery. This project aims to ensure an effective, motivated and skilled workforce which can manage the new repairs contracts and deliver our capital and asset management programmes.
6.4 Voids transformation	Work on voids transformation is progressing at pace and aims to clear the backlog of voids, reduce key to key void time and improve the quality of the service. A Voids Resident Satisfaction Survey has been developed and has had good levels of response. The review of the lettable standard is now in design, with the voids lettable standard to be finalised as a result. Continuous monitoring is being undertaken to ensure that our new processes, as part of the disrepair transformation project, are working correctly. The service is looking at preventative measures to stop repairs turning into disrepairs and a new payment system has been implemented to ensure all payments to external solicitors and joint experts are completed on time. Additionally, the service has implemented a new process of works to prioritise breach claims and a create new master control sheet to be shared with key stakeholders.
6.5 Disrepair transformation	A Paper has been written to inform the corporate management team of the issues around disrepair, including the work being undertaken to improve the service and minimise new claims, which will be submitted soon. The actions from the recent Housing Disrepairs internal audit are being worked through. A Disrepair Surveyor Apprentice is due to be recruited in October 2023.
6.6 Review of policies, procedures, business processes and customer journeys	Policy writing is underway, with a number of policies drafted and awaiting further sign off. These include the decant, tenant management and void management policies. Key policies that impact service delivery to residents will be consulted appropriately.
6.7 Review of Capital Delivery Contract	A tender was issued in mid-May 2023 but did not attract enough interest. The scope is being revisited following soft-market testing which will be conducted via the Procurement Team. Following this the tender will be re-issued.
6.8 Targeted Approach to Damp and Mould	An initial draft of a technology led approach to damp and mould has been submitted to the senior leadership team for consideration. Damp and Mould interventions are now being delivered by the new contractors and migration to NEC is now completed. A data cleanse has also been completed.

People & Organisational Development

7.2 Enabling high performing teams and setting behavioural expectations	A competency model has been created, setting out clear behavioural expectations and will be linked with succession planning, recruitment and recognition. The model has been used in recent recruitment exercises and may potentially be used by the corporate centre for the rest of the organisation.
7.6 Talent acquisition: Apprenticeship/ Graduate Programme/EVP	A number of apprenticeships have been devised and are currently undergoing the approval process for recruitment in the coming months. The Directorate is also actively participating in the Graduate programme.
7.10 Intra-directorate communication and engagement	A programme of intra-directorate communication and engagement has been developed. It is now part of the Directorate's BAU activity and will no longer be reported on going forward.

Managing our Housing Needs

8.1 Housing Needs restructuring	The Housing Needs and Homelessness restructure has gone live and staff are being supported across the directorate to embed the structure. The new structure has been designed to improve the service from being historically reactive to more proactive and early intervention focused. A long-term programme of training is being developed to support all staff in the new structure.
8.2 Supported Housing Review	This project intends to review supported housing provision and support care leavers into appropriate housing provision. The project is in the early stages of mobilisation.
8.3 DPS – Procurement of contracts	A new housing procurement resource has been recruited to and is now providing support to progress the purchase of the software. The software is to be directly purchased and a specification has been drafted and is awaiting comments and once finalised will be shared with Procurement to advertise it via London Portals.
8.4 Homelessness Prevention and Rough Sleeping Strategy	The Homelessness Review which is required as part of the strategy development has now been drafted. A consultation plan for the strategy's proposed priorities and objectives is being developed and is due to go live in September 2023. Engagement sessions are also being developed as part of this.
8.8 Housing Association Liaison	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. A

Recharges & Nominations	meeting has been held with 3 Registered Social Landlords who have agreed to pay backdated fees, this project is intended to maximise income owed to the Council as a result of the management of choice based lettings.
8.9 Data Cleanse & Rent Accounts	This project is being closed, and the tasks and outcomes within it transferred to an alternative project.
8.10 Supported Exempt Accommodation Review	This project has now been moved to sit under the Benefits team and no longer forms part of the Housing Transformation Programme.

4.13 Fourteen projects have been closed following their completion; these include:

- 1.1 Vision & Mission Setting
- 1.2 Root Cause Diagnostic/Delivery
- 1.4 HIP/Transformation Plan
- 1.6 Governance structure for Housing Transformation Programme
- 2.4 Review of Tenant Involvement Structures
- 2.5 Financial governance review
- 3.1 Resident Charter development and delivery
- 3.3 Short-term customer services improvement plan
- 3.11 Rent setting consultation initiative
- 3.13 Community Development and Inclusion Programme
- 3.15 NEC Migration
- 6.1 Repairs re-procurement
- 6.2 Repairs contact centre
- 7.10 Intra-directorate communication and engagement

4.14 Risks and challenges

4.15 Highlight reports are produced monthly and report of the risks and issues for the delivery of the Housing Transformation Programme at a project level. These risks, issues, and mitigations are reviewed on a monthly basis at the Housing Transformation Steering Board meetings. 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, known as JCAD.

4.16 Major projects such as the delivery of the Repairs re-procurement contract have their own risk and issues log which are reviewed and assessed at weekly or fortnightly project board meetings.

4.17 There are several challenges faced by the Council in the course of delivering the Housing Transformation Programme. These challenges stem from recent legislative

changes introduced by the current Government, which impact various aspects of social housing, housing needs, and homelessness:

- Fire Safety Act 2021
- Building Safety Act 2022
- Social Housing Regulation Bill
- Renters (Reform) Bill
- Supported Housing (Regulatory Oversight) Bill

4.18 In addition to the new legislation, the Regulator of Social Housing and the Department for Levelling Up, Housing & Local Government are currently revising 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 is currently being undertaken on the proposed consumer standards to identify any risks.

4.19 Notable risks have also been identified for major projects, including ensuring the accuracy of reconciliation for NEC and that the new repairs contractors operate effectively during the demanding winter season.

4.20 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 the Housing Needs service and sustaining essential front-line services. .

5 CONTRIBUTION TO COUNCIL PRIORITIES

5.1 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."

6 IMPLICATIONS

6.1 FINANCIAL IMPLICATIONS

6.1.1 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.

- 6.1.2 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.
- 6.1.3 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.
- 6.1.4 Comments approved by Orlagh Guarnori on behalf of the Director of Finance. (Date 12/09/2023)

6.2 LEGAL IMPLICATIONS

- 6.2.1 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, under common law nuisance and negligence principles, and under express or implied terms of the tenancies it has granted.
- 6.2.2 The Housing Transformation Programme is also assisting the Council in complying with the consumer standards set by the Regulator of Social Housing.
- 6.2.3 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.
- 6.2.4 There is also a range of new and emerging draft legislation which will impact various aspects of the council's legal responsibilities in relation to the provision and maintenance of social housing, housing needs, and homelessness. In particular:
 - 6.2.4.1 The Fire Safety Act 2021 <https://www.legislation.gov.uk/ukpga/2021/24/contents/enacted> and the Fire Safety (England) Regulations 2022 <https://www.legislation.gov.uk/uksi/2022/547/contents/made> 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.
 - 6.2.4.2 The Building Safety Act 2022 <https://www.legislation.gov.uk/ukpga/2022/30/contents/enacted> 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.

6.2.4.3 The Social Housing Regulation Act 2023 <https://www.legislation.gov.uk/ukpga/2023/36/enacted> 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 their 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 landlords expense. Also Housing Managers will be required to have an 'appropriate level housing management qualification' regulated by Ofqual.

6.2.4.4 The Renters Reform Bill <https://bills.parliament.uk/bills/3462> due to pass into law in 2024, proposes to abolish 'no fault' evictions empowering renters to challenge the small minority of landlords who provide poor quality housing without the worry of a 'no fault' eviction.

6.2.4.5 The Supported Housing (Regulatory Oversight) Act 2023 <https://www.legislation.gov.uk/ukpga/2023/26/enacted> will impact the provision of supported housing and sets a new framework of systems for the supported housing and older person's housing sector.

6.2.5 Finally, the Council as a best value authority 'must 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' in Section 3 of the Local Government Act 1999 (LGA). The best value duty applies to all functions of the Council including delivery of its statutory housing services. On 20 July 2023 the Secretary of State for Levelling Up, Housing and Communities (SoS) issued Directions under Section 15(5) of the LGA to the Council due to its failure to comply with the best value duty. The SoS Directions require the Council to take a number of actions which include 'to continue to improve the capacity and capability of the authority's housing service.' The Directions are expected to remain in force until 20 July 2025 but could be amended or revoked at an earlier date by the SoS, if appropriate. The recommendations in this report are supportive of the actions required under the SoS Directions in relation to the housing service.

6.2.6 Comments approved by the Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (Date 11/09/2023)

6.3 EQUALITIES IMPLICATIONS

6.3.1 The Council has a statutory duty to comply with the provisions set out in the Equality Act 2010. In summary, the Council must in the exercise of all its functions, "have due regard to" the need to comply with the three aims of the general equality duty. These are to •

Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act • Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and • Foster good relations between people who share a protected characteristic and people who do not share it.

- 6.3.2** Having due regard means to consider the three aims of the Equality Duty as part of the process of decision-making. This means that decision makers must be able to evidence that they have taken into account any impact of the proposals under consideration on people who share the protected characteristics before decisions are taken.
- 6.3.3** Regard for the Council's public sector equality duty will be central to Housing Transformation Programme. The creation of a revised Housing Transformation Programme will be accompanied by the development of equalities impact assessments at a project level, where necessary, which will be developed in conversation with the Equalities Programme Manager. Work undertaken as part of the Change & Enablement Focus will be key to ensuring the projects address the public sector equality duty. The project managers responsible for the delivery of projects within the workstreams will ensure the EQIAs produced accurately assess the potential impact on vulnerable groups, and groups that share protected characteristics. All EQIAs produced will be treated as living documents and will be updated when data becomes available and new equality objectives identified where appropriate. The Transformation Programme includes a new IT system designed to improve data collection for residents. However the department should ensure that residents data is collected both by the Council and its contractors.
- 6.3.4** Improving data collection from service users across the nine protected characteristics will benefit decision making by ensuring that decisions are based on clear evidence. Departments will also evidence customer satisfaction and dissatisfaction using this method across the protected characteristics to ensure that the Council is delivering a fair and equitable service to all protected groups. Satisfaction surveys should include a question on discrimination to ensure that there is no repetition of allegations of racial discrimination by service users which were considered by the ARK Consultancy report. There should be an onus on both officers and contractors to ensure that their behaviours to residents is both helpful and respectful and that residents should no longer perceive that they have been discriminated against in relation to their race or treated without dignity and respect irrespective of equality characteristic.
- 6.3.5** Poor housing conditions and perceptions of unfair treatment are likely to exasperate existing mental health conditions or create new mental health conditions. In particular, when exasperated by other socio-economic impacts such as poverty, unemployment and the cost-of-living crisis. It is important that residents are treated in a fair, respectful and equitable manner to ensure that existing or new conditions are not triggered by behaviour of staff or suppliers. It is important that staff training reflects this.

- 6.3.6** Residents with disabilities or parents of children with disabilities may be treated more favourably than others in relation to housing improvements. This will not amount to discrimination in relation to the Equality Act 2010.
- 6.3.7** The Council will also encourage its suppliers to adopt the Council's standards for equality in the borough: Croydon's Equalities Pledge and the George Floyd Race Matters Pledge.
- 6.3.8** Comments approved by Naseer Ahmad for Equalities Programme Manager (19/09/2023).

6.4 HUMAN RESOURCES IMPACT

- 6.4.1** 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 & Re-organisation Policy, which may include redundancies/redeployment/insourcing/TUPE of staff.
- 6.4.2** To achieve an enduring culture change in the housing service 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 the Team cannot deliver the required change programme and an external provider will have to be procured.
- 6.4.3** Any HR issues arising will be managed under the Council's Corporate Policies and Procedures.
- 6.4.4** Approved by Jennifer Sankar, Head of HR Housing Directorate & Head of HR SCRER for and on behalf of Dean Shoemith, Chief People Officer [13/09/2023].

6.5 CRIME & DISORDER IMPACT

- 6.5.1** 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.
- 6.5.2** Comments approved by Director of Culture & Community Safety, Kristian Aspinall [19/09/2023]

7 APPENDICES

A Programme Workstreams

B Current Projects

9. BACKGROUND DOCUMENTS

N/A

9. URGENCY

N/A

DRAFT

Appendix A

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.

Appendix B

A total of 31 projects across all of the 8 workstreams are now live.

- 1.3 Housing Strategy
- 1.5 High level re-structure and recruitment
- 2.1 Revised Performance Framework and Business Intelligence
- 3.2 Resident Engagement Strategy
- 3.4 Customer Information review
- 3.5 Customer journey review
- 3.7 Customer Service Training
- 3.8 Customer Learning & review of process
- 3.9 “Stop Social Housing Stigma” Campaign
- 3.10 Review of Consumer standards
- 3.12 Know our Neighbourhoods programme & Estate Inspections
- 3.16 NEC Post Go-Live Product Development
- 4.1 Resolution programme for Regina Road.
- 4.2 Resolution programme for LPS blocks
- 4.3 Development of Asset Management Strategy
- 4.4 Estates and Improvement restructure
- 5.1 Compliance plan for Fire Safety Act 2021
- 5.2 Compliance plan for Building Safety Act
- 6.3 Repairs restructure and behaviour change programme
- 6.4 Voids transformation
- 6.5 Disrepair transformation
- 6.6 Review of policies, procedures, business processes and customer journeys
- 6.7 Review of Capital Delivery contracts
- 6.8 Targeted Approach to Damp and Mould
- 7.2 Enabling high performing teams and setting behavioural expectations
- 7.6 Talent acquisition: Apprenticeship/Graduate Programme/EVP
- 8.1 Housing Needs restructuring
- 8.2 Supported Accommodation Review

8.3 DPS – Procurement of contracts

8.4 Homelessness Prevention and Rough Sleeping Strategy

8.8 Housing Association Liaison Recharges & Nominations

DRAFT