



Action Plan

**To achieve 'Confident Compliance'
with the Housing Consumer Standards**

Version 1-2 (July-October 2024)

Introduction

On the 01 April 2024 new Consumer Standards for social housing providers came into force. The new standards are intended to protect tenants and to drive improvement in the services that social landlords provide.

These new standards will apply to Fareham Housing and all other Registered Providers nationally.

Through changes in legislation the Regulator of Social Housing (RSH) will undertake inspections and have stronger enforcement powers to make social housing providers address issues.

Objective

To swiftly make meaningful progress toward 'confident compliance' with the Consumer Standards, aiming for confident compliance (based on Self-Assessment) before the end of 2025.

The term 'confident compliance' has been internally derived, reflecting that it will be down to Fareham Borough Council (senior Officers and Councillors) to be assured that the standards are being complied with, and to demonstrate this at Inspection. Increased and secure (i.e., confident) compliance is therefore the objective.

Background

The Grenfell fire tragedy, and the death of Awaab Ishak from mould in the home, have focussed attention on the quality of social housing and social housing providers like never before. The government's policy response to these tragedies led to the Social Housing (Regulation) Act 2023, which became law on the 20 July 2023. A key part of the Act is increased regulation of social housing providers.

The RSH ~~consulted on a draft set of published and confirmed new~~ Consumer Standards in ~~Autumn~~ April 2024 ~~2023~~. ~~Officers immediately began assessing how Fareham Housing potentially performed against these draft expectations.~~

~~On 08 February 2024 the Housing Scrutiny Panel considered a report which (a) outlined the draft new standards; (b) explained the anticipated inspection regime by the Regulator; (c) provided an assessment of current performance against the draft standards; and (d) identified initial actions to improve compliance.~~

~~As part of the recommendations agreed by the Housing Scrutiny Panel in February 2024 a further report would be provided to the Council's Executive in 2024, and an Action Plan would be developed and reported to a future Housing Scrutiny Panel meeting.~~

This Action Plan is intended to articulate the intentions of the Council to improve, and to work toward 'confident compliance' with the Consumer Standards. It will be iteratively updated and kept under review.

Summary of the Consumer Standards

The ~~final standards were published by the Regulator on 02 April 2024. They~~ are split into four categories: -

- **The Safety and Quality Standard** – requires landlords to provide safe and good quality homes and landlord services to tenants.
- **The Transparency, Influence and Accountability Standard** – requires landlords to be open with tenants and treat them with fairness and respect so that tenants can access services, raise complaints when necessary, influence decision making and hold their landlord to account. This includes the Tenant Satisfaction Measures that applied from 01 April 2023.
- **The Neighbourhood and Community Standard** – requires landlords to engage with other relevant parties so that tenants can live in safe and well-maintained neighbourhoods and feel safe in their homes.
- **The Tenancy Standard** – sets requirements for the fair allocation and letting of homes and for how those tenancies are managed and ended by landlords.

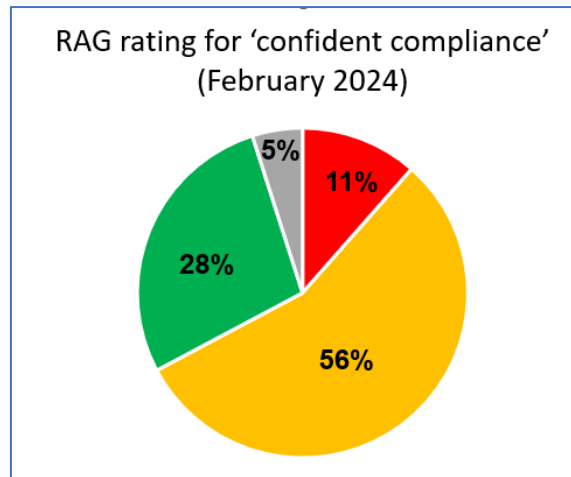
Within each of the four categories there are multiple 'specific expectations' which total over 60 in number.

Self-Assessment: ~~The Position in February 2024~~

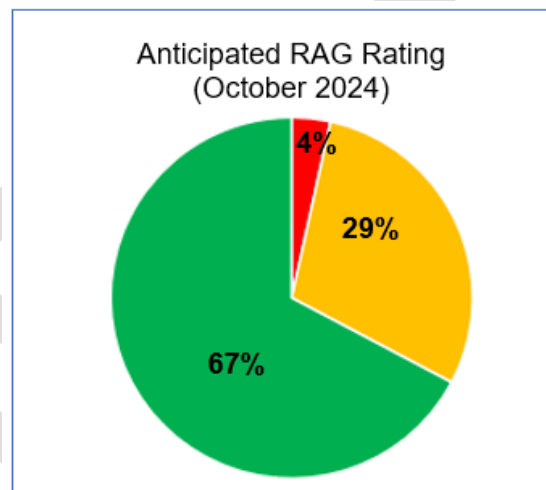
A RAG (red, amber, green) rating has been used to internally assess how Fareham Housing perform against the expectations. This has taken an intentional pessimistic view to drive and monitor rapid progress against the standards.

The RAG rating assessment is currently based on an interpretation by the Housing Management Team. How the Regulator will determine compliance might only be fully tested and understood when Fareham Housing is first Inspected. The outcomes of remains to be seen. Matters will likely become clearer as Inspections at other social landlords take place and are published during 2024/25. The self-assessment at this stage can therefore only be seen as a guide on where improvements are needed are however providing some initial insight on the process and evidence required..

Of the 61 specific expectations, the previous and current position is outlined below. ~~!In February 2024 (against the then draft expectations) was as follows:~~



~~The RAG rating assessment is currently based on an interpretation by the Housing Management Team. How the Regulator will determine compliance remains to be seen. Matters will likely become clearer as Inspections at other social landlords take place and are published during 2024/25. The self assessment at this stage can therefore only be seen as a guide on where improvements are needed.~~
The estimated position in October 2024 is as follows:



Inspections and Results

The Regulator anticipates that each registered social landlord will be inspected once every four years. Six weeks' notice of an Inspection will be provided, and the Inspection will involve a desk-based assessment by the Regulator and 2-days of on-site visits. As part of the on-site visits, we would anticipate the Regulator speaking to senior housing Officers, the Chief Executive Officer, the Executive Member for Housing, and some Fareham Housing tenants.

The inspection outcome will be graded between 'Compliance 1' and 'Compliance 4' (e.g. C1, C2, C3, or C4). C1 or C2 would be compliant and meeting expectations. C3

or C4 will recognise the need for improvement; the Regulator would then work with the relevant landlord to ensure improvements are made.

Governance and Assurance

In a day-to-day sense the compliance with the Consumer Standards will be monitored and actioned by Officers, led by the Director of Housing. However, the Regulator is clear that in the case of Local Authority Registered Providers, the responsibility lies with Councillors to deliver the outcomes of the standards.

There must therefore be robust mechanisms to provide assurance that the Council are meeting the required standards. This will principally involve the Executive Member for Housing, the Housing Scrutiny Panel, and (following any inspection) the Audit and Governance Committee.

Further information on the actions pertaining to governance, assurance, and monitoring, is provided at Table 4.

This Action Plan will be an iterative document that will be updated intermittently and used as part of monitoring, governance, and assurance.

Actions

The key actions that will be taken forward, and which are intended to achieve confident compliance, are articulated in the tables below.

Acronyms

CORE – Continuous Recording of Lettings system (national system)

CST – Community Safety Team

DoH – Director of Housing

EMH – Executive Member for Housing

HMT – Housing Management Team (consists of DoH, Head of Housing, Pathways Manager, Neighbourhood Manager, Property Manager (Housing), Housing Delivery Manager, Strategy and Systems Manager, Principal Tenant Engagement Officer, and Office Manager)

HSP – Housing Scrutiny Panel

LARP – Local Authority Registered Provider

NM – Neighbourhood Manager

PTEO – Principal Tenant Engagement Officer

RPs – Registered Providers

SLT – Senior Leadership Team (Chief Executive Officer and all Directors and Assistant Directors at Fareham Borough Council)

SSM – Strategy and Systems Manager

Table 1: General Actions

Action	Lead Officer	Anticipated Completion	Progress
Ensure the whole Housing Department have a broad awareness on Consumer Standards.	DoH	2023/24	COMPLETE Feb 2024 Housing staff attended one of two 'all department' workshops in Jan/Feb '24. This included a presentation by the DoH about the emerging Consumer Standards, the Inspection regime, anticipated performance at that point, and work required ahead. <u>A refresher will be provided in November 2024.</u>

Staffing structure changes and recruitment to enable actions to be addressed in timely manner.	DoH	2023/24	COMPLETE Apr 2024 A staffing restructure of the department was confirmed in March 2024. This included setting up a Strategy and Systems team. A key part of this team's function is to be the department lead and oversight of all strategies, policies, and data. This will be key in driving the actions identified to achieve confident compliance against the standards. In addition, a Principal Tenant Engagement Officer was recruited (new post). The post holder took up their position in early April 2024. This will enable a focused approach on tenant engagement in the context of the Consumer Standards requirements.
Identify where Policies, Strategies or guidance notes need to be developed, reviewed, or improved.	HMT	2023/24	COMPLETE Apr 2024 This information has informed the Specific Actions identified in Table 2.
Develop a list of other actions to be addressed.	HMT	2023/24	COMPLETE Apr 2024 This information has informed the Specific Actions identified in Tables 2 & 3.

Table 2: Specific Actions

Action	Lead Officer	Anticipated Completion	Progress
Annual Review/Report	DoH	Summer 2024	<u>IN-PROGRESS COMPLETE</u> Currently drafted. Anticipated to be confirmed and published in July 2024. Measures in place for annual reviews each year going forward.
'Who's Who' to be made available	PTEO	Summer 2024	<u>PART-COMPLETE COMPLETE</u> Some information provided to all tenants as part of November 2023 'Housing News'. Currently being reviewed to then be published on website. Further information available on website. Potential further

			<u>inclusion in later editions of Housing News will be considered.</u>
Tenant Engagement Strategy	PTEO	2024/25	<u>IN PROGRESS COMPLETE</u> Following appointment of Principal Tenant Engagement Officer this workstream has commenced. Anticipating adoption of new Strategy in Nov/Dec 2024. Interim approach to engagement to be developed/actioned in the meantime. <u>New Tenant Engagement Strategy adopted in September 2024. Work underway to bring forward engagement and embed culture.</u>
Tenancy Strategy	NM	2024/25	PENDING Detailed timetable for workstream to be established.
Tenancy Management Strategy	NM	2024/25	PENDING Detailed timetable for workstream to be established.
Tenancy Agreement update	NM	2025/26	PENDING Detailed timetable for workstream to be established.
Tenant diverse needs understood	NM	2025/26	IN PROGRESS Establish different contact groups, contact types, ethnicity of customers. Information currently gradually being collected as part of interactions with customers, mainly via Neighbourhood Officers.
Anti-Social Behaviour Policy	CST & NM	Autumn 2024	<u>PART COMPLETE COMPLETE</u> Draft document completed. To go to relevant Scrutiny Panel and Executive in summer 2024, adoption expected in Autumn 2024. <u>New ASB Policy adopted in September 2024.</u>
Domestic Abuse Policy	NM	tbc	PENDING Detailed timetable for workstream to be established.
Hate Incidents Guidance Note	CST & NM	tbc	PENDING Detailed timetable for workstream to be established or establish if sufficiently covered in new ASB Policy.

Mutual Exchange Policy / Guidance Note	NM	tbc	<u>IN PROGRESS COMPLETE</u> Draft consultation anticipated in the summer 2024, adoption in autumn 2024. <u>Adopted in October 2024 (subject to Executive agreement 07/10/24)</u>
Repairs Policy	SSM	Autumn/ Winter 2024	<u>PART COMPLETE</u> Draft document produced. <u>Public Consultation underway (16/09-28/10). Anticipated to be adopted in December 2024. To go to relevant Scrutiny Panel and Executive in summer 2024, adoption expected in Autumn 2024.</u>
Tenant Disabled Adaptations Guidance Note	SSM	tbc	<u>PENDING COMPLETE</u> Detailed timetable for workstream to be established. <u>Affordable Housing Adaptations Policy was adopted in 2024. This will be further supported by the Repairs Policy (anticipated to be adopted in December 2024).</u>
CORE annual submission resumed and completed.	SSM	2024	<u>PART COMPLETE COMPLETE</u> Strategy and Systems team now set up to lead on future CORE submissions. Submission for Q1 of 2024/25 expected to be achieved. <u>achieved.</u>
Website content improvements and updates	PTEO and SSM	2024	<u>PENDING</u> Detailed timetable for workstream to be established. Some improvements already being actioned. <u>Ongoing workstream.</u>

Table 3: Specific Actions - desired

Action	Lead Officer	Anticipated Completion	Progress
Strategic Objectives and Aims	DoH	tbc	<u>PENDING</u> Objectives and aims currently established in the adopted Affordable Housing Strategy (2019). Review would be beneficial to make it more relevant for Fareham Housing tenancy services.

Upkeep & Safety of Shared Spaces Guidance Note	SSM	tbc	PENDING Detailed timetable for workstream to be established.
Incentive Scheme (downsizers) Guidance Note	NM	2024/25	IN PROGRESS Update to current approach required, and ensure in useable format. Currently being drafted. Anticipated to be confirmed and published in 2024/25. <u>Pre-scrutiny of revised approach went to Housing Scrutiny Panel on 27/06/24.</u>
Void Process Note	NM	tbc	PENDING Detailed timetable for workstream to be established.
Enhance Planned Maintenance information on website	SSM	tbc	PART COMPLETE Information currently available but will be enhanced as outcomes from stock conditions surveys 2024-2029 are annually available & maintenance programmes refined.
Data collected to support how adapted homes are appropriately allocated	SSM	tbc	PART COMPLETE Enhanced data collection on adapted and adaptable homes in the void process collected from November 2023. Data is collected on allocations, so would require extraction and presentation in appropriate format.
Compliance with health and safety assessments	SSM	2024/25	<u>PART COMPLETE COMPLETE</u> Interlinks with technical requirements from management information for Tenant Satisfaction Measures <u>Tenant Satisfaction Measure submission complete (includes data from management information relating to health and safety).</u> Annual submissions to be made in June each year for previous financial year. <u>Ongoing annual requirement.</u>

Table 4: Governance, Assurance, and Monitoring Actions

Action	Parties Involved	Frequency	Information and Progress
Ongoing Lead Officer oversight	DoH	Ongoing	ONGOING Providing information to relevant Councillors, and leading the officer actions and momentum to achieve confident compliance with the Consumer Standards
Housing Management Team: Progress Reviews	HMT	Monthly	ONGOING <ul style="list-style-type: none"> HMT to discuss and review progress and actions against the specific actions; and Review outcomes from Inspections at other RPs and LARPs to improve understanding of the Standards and assist with accuracy of self-assessment process.
Self-Assessment	HMT	Quarterly	COMPLETE AND ONGOING To quarterly review the RAG rating of performance against the standards.
Executive Member Briefings	DoH and EMH	Quarterly (minimum)	COMPLETE AND ONGOING DoH to provide EMH with an overview and informal briefing of progress, achievements, and challenges. To also include any relevant findings from inspections at other providers.
Executive Report	Councillors	By Autumn 2024	PENDING COMPLETE DoH to produce a report for Report to Executive to provide an overview of the new Standards, Inspection regime, our action plan, our progress etc. To include recommendation on role of HSP to provide future scrutiny and governance relating to compliance with the standards. Scheduled for July 2024.
Inspection outcome monitoring	HMT	Ongoing	ONGOING To review outcomes from early Inspections by the Regulator to establish any learnings, reviewing our self-assessment and RAG rating as appropriate.

Senior Leadership Team governance (includes Chief Executive Officer)	SLT	Annual	COMPLETE - JUNE 2024 DoH to provide SLT with an overview of performance and anticipated compliance against the standards. Providing internal senior officer governance and oversight.
Housing Scrutiny Panel (HSP) Report: TSM Submissions	Councillors	Annual	ONGOING HSP to review and note the TSM submission data in spring/summer each year (pertaining to previous financial years performance). This will commence from 2025, with 2024 data briefing to EMH.
Housing Scrutiny Panel (HSP) Report: Annual Review	Councillors	Annual	ONGOING HSP to review and agree the Annual Review in spring/summer each year (pertaining to previous financial years information). <u>To begin from 2025.</u>
Housing Scrutiny Panel (HSP) Report: Consumer Standards Performance Overview	Councillors	Annual	ONGOING DoH to produce a report for HSP annually to provide a clear overview of progress and performance against each of the Specific Expectations. To include RAG rating updates in table and pie chart format to aid comparison over time.
Audit and Governance Committee	Councillors	Post Inspection	WHEN APPROPRIATE To be updated post Inspection (as required) to advise of the findings of the Regulator, including qualitative findings, compliance rating, and any actions or improvements recommended. Of note is that Inspections are anticipated once every four years.

Expected Outcomes

- Governance and Assurance established, and on-going.

- Significant and demonstrable progress achieved against the Consumer Standards in 2024/25
- 'Confident compliance' with the Consumer Standards in 2025/26 (based on Self-Assessment)
- Continued reflection and review
- Self-referral to the Regulator of Social Housing if/as necessary (utilising the co-regulatory approach)

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