

INDEPENDENT REPORT TO CABINET

ON

HOUSING IMPROVEMENT PLAN

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1. Introduction

It is now almost exactly a year since the first ITV News report about the shocking and unacceptable state of properties in Regina Road, and the appalling treatment tenants had experienced over a long period. It is 10 months since the independent report by ARK set out clearly what had gone wrong in Regina Road and across the housing service and made recommendations for improvement.

Sometimes organisations with serious problems are in denial or shift the blame towards others. Commendably, that is not the case with Croydon Council. Its political leadership, the leadership of the Opposition, councillors generally and staff at all levels accept that the service has been letting tenants down. There has also been no attempt to deflect from the need for very radical change and improvement. The council has tried actively to listen to tenants through large-scale door-knocking.

"There is utter political determination from us to improve the experience of our council tenants."
Cllr Hamida Ali

"The terrible problems in Regina Road...were truly shocking."
Cllr Lynne Hale

(At first meeting of Board, 7 December 2021)

Acceptance of the need to change and intent to improve are important and welcome. The improvement needed is massive and will take years to bring about and entrench fully. However, to be more confident of the council's ability to bring it about, the Board would need more assurance that two ingredients are in place: solid evidence that good intentions are being translated into real change in the experience of tenants and residents; and a strong, solid, medium term plan, driven by a clear vision of what needs to change for the council's housing customers.

In both cases, it is vital that there is a drive towards effective planning and action corporately, as well as in the housing service.

Change in the experience of tenants and residents

No one could expect a complete fix of such serious and embedded problems in as little as a year. In However, in that time, it should have been possible to make some tangible improvements and lay the foundations for longer term recovery. Not enough has been accomplished:

- Not one of the "immediate actions" identified in the ARK report has been completed. Of particular significance, many tenants in the block 1-87 Regina Road and its two neighbours are still living in very poor conditions. The council is only at the very early stages of planning the substantial works which will be needed to address underlying structural issues.
- The council rightly took an early decision to restructure leadership, bringing the service together under a single corporate director. A new leadership structure is now in place. However, it only last month made a permanent appointment to the vital role of Corporate Director, Housing, and the appointee will not take up post until May. Only four out of 13 other senior leadership posts are filled on a permanent basis.
- The commitment to providing a good service to tenants, to treating them with respect, and involving them in a way which has impact, has not been translated fully enough into action. Although repairs performance across the sector over the last couple of years has been affected by Covid and labour shortages, Croydon's performance has not improved

significantly in recent months, in contrast to recovery in many other social landlord organisations. We have heard from many tenants that they struggle to make the council and Axis take issues seriously, they do not feel respected or taken seriously, and we have heard about some examples of shocking rudeness and inhumanity. There was an inexplicable and inexcusable failure to follow due process in consulting tenant representative bodies about the 2022 rent increase, a decision very obviously of great sensitivity and concern for tenants. The Improvement Plan, despite this Board's feedback on earlier versions, still does not clearly enough put front and centre a clear vision of the change in the experience of tenants which it needs to bring about.

Improvement Plan

The ARK report mapped out clearly the main lines of the improvement needed. It is therefore, again, disappointing that (as it appears to us) it has not been possible to produce a stronger plan during the subsequent 10 months. We have been working closely with officers on the Improvement Plan since it was first presented to us in January, and the version presented to Cabinet for approval reflects feedback from our January and February meetings. However, it needs considerable further work if it is to command our confidence, and, much more important, the council's tenants.' Officers need to do further work; it needs the input of the new corporate director. Preparation of a strengthened version for approval by the incoming Mayor should be a priority for the new administration.

The table on page 3 summarises our main suggestions for improvement. They are explained more fully in section 3 of this paper.

Corporate focus

It is extremely important that the council treats the necessary radical transformation in the management of its housing stock and the experience of tenants as a corporate issue:

- The experience of tenants is not just shaped by the performance of the housing service and the attitude of its employees. Tenants' experience of where they live is affected by poor performance from other services, notably waste collection and neighbourhood cleansing, as well as from the housing service. The council needs to work across the board to improve that experience, focusing on estates as places.
- Improvements needed to the housing service – a more open and respectful relationship with local people (in this case tenants and residents of the council's stock; better oversight and governance by Members; effective contract management; effective financial management both of day to day spending and capital; and improvements in workforce and digital – are also required right across the council, and the council needs to make sure its corporate improvement supports positive change in the housing service.

This is why we urge the Cabinet not to approve the recommendation in the Improvement Plan paper that further development of the Plan be delegated to the Cabinet Member and Corporate Director.

Recommendations for strengthening the Improvement Plan

Regina Road	<ul style="list-style-type: none"> • Offer relocation to any further tenants of the three blocks experiencing damp and mould caused by the fundamental structural problems, with priority for those households including members vulnerable to respiratory illness. If suitable council properties are not available, the council should lease alternative suitable homes. • Keep a close eye on the condition of remaining occupied properties and maintain the local staff presence on the estate.
Governance	<ul style="list-style-type: none"> • The Tenant Engagement Structure should be plugged formally and clearly into the council's governance. • The system for managing and recording complaints should ensure data is clear, including the outcomes of complaints and the timescales. Complaints data should be used intelligently to inform investment and shape preventive maintenance. • The new legislative requirements under the White Paper and Building Safety Bill should be built into the data framework. • There needs to be focused work to shift the organisational culture to one that empathises with the experience of tenants (see 3 below). • The council needs to put in place a clear casework system which enables ward councillors and MPs to have visibility of the progress and outcomes of their referrals, and enables the council's leadership to assure the performance of the service in responding to casework. • After the May elections, the council should provide training, support and appropriate access to new and returning ward councillors to assist them in performing their important function – including a programme of regular stock visits and training on how to use visits to play their part in assurance.
Treating Tenants with Respect	<ul style="list-style-type: none"> • Clear, timetable, targets, for recovering service performance on repairs and voids. • A Tenant's Charter, developed in close engagement with tenants. It needs to reflect their expectations and the Regulator of Social Housing's emerging framework for customer service. • Clear standards for communication, developed after extensive engagement and testing with tenants, in the involvement structure and more widely. A set of "for example" standards proposed by the tenant board members is set out below.
Improving Data and its Use	<ul style="list-style-type: none"> • Control and assurance over the implementation of the new asset management system and migrating poor asset condition data into it. • Ensuring performance reports show the level of backlog, as well as the number of repairs completed.
Staff capability	<ul style="list-style-type: none"> • No specific additional suggestions, but: <ul style="list-style-type: none"> ➤ Development and application of proposed behavioural framework is vitally important. ➤ Change needs to be developed with strong engagement from staff and the Trade Union Side.
Quality of Planning	<ul style="list-style-type: none"> • Plan to put front and centre a clear vision of the change in the experience of tenants which it needs to bring about. • Include clear reconciliation with financial plan (HRA Business Plan). • Include analysis of risk and mitigations.

2. How we went about our work

The process to appoint board members and enable the board to start work has meant that we have only had three months since our first meeting in December 2021 to get to grips with our task and form our independent view about what has been done to bring about improvement in the housing service and make good plans for the future.

At our first meeting, we decided that, in the time available to us, we needed to focus on five issues:

1. **The extent to which the council has put right the unacceptable living conditions and experiences of tenants at 1-87 Regina Road and its two neighbouring high-rises.** Of course, the council is landlord for around 15,000 other properties, and improvement is needed across the piece. But improvement cannot be credible without a transformation in the experience of these tenants.
2. **What lessons the council has learned about officer and member governance and make recommendations for the future.**
3. **How the council has begun to treat tenants with the respect they deserve and set the foundations for further change.**
4. **What the council has already done to improve data and its use in performance management and its plans for further improvement.**
5. **How the council is improving staff capability through training, development and recruitment.**

We have also been considering, and providing feedback on the extent to which the Plan, as a whole, meets the tests of any sound plan, including clarity about intended outcomes, the relationship between planned activity and resources, and risk.

In addition to our meetings, we have had numerous one to one conversations with tenants, Members and officers; engaged with the Tenants' and Leaseholders' Panel; and the two political groups very kindly invited the Chair to attend their meetings. We attended a drop-in session at Regina Road to listen to what tenants there had to tell us. In the limited time available, we have not been able to get out and about round the council's stock and hold widespread conversations with tenants. This is something we will look to do more extensively in the next stage of our work.

3. Our findings

1. Regina Road

The council has been very active on the estate, setting up a contact point for tenants there, and sending a repairs inspector to look at all properties. Some 20 families have been moved out of properties which were in a completely unacceptable state. In properties which remain occupied, the council has tried to improve conditions by carrying out repairs and treating mould.

The experience revealed by the TV coverage was of completely unacceptable repairs performance and unresponsive and disrespectful behaviour by council and Axis staff. However, even if those issues were to be addressed, there are structural problems with the blocks, including their roofs and pipework, which can only be addressed by major works. Such work could never have been planned and completed in as little as a year. However, it has not progressed quickly enough. The consultant report assessing the condition of the properties and scoping the shorter- and longer-term works needed was not completed until November 2021. Work to progress the major works is only now starting – with the involvement of a tenant reference group, which participants and we welcome.

We have heard some positive stories from tenants about improvements in repairs performance and staff attitudes. However, others have told us that they continue to live in unacceptable conditions caused by severe levels of mould and damp. This is not acceptable for any residents, but poses a particular risk to the health of some residents with medical conditions putting them at particular risk of respiratory illness. The consultants' report found that none of the three blocks is in a reasonable state of repair. Tenants still experiencing poor conditions cannot understand why they are being refused moves when other families have been relocated.

In addition to actions planned and under way already, the council needs to:

- Offer relocation to any further tenants of the three blocks experiencing damp and mould caused by the fundamental structural problems, with priority for those households including members vulnerable to respiratory illness. If suitable council properties are not available, the council should lease alternative suitable homes.
- Keep a close eye on the condition of remaining occupied properties and maintain the local staff presence on the estate.

2. Governance

We support the proposals in the Plan, so far as they go. The governance issues are principally corporate, about how the political leadership of the council oversees the housing service, and corporate officer leadership provides necessary oversight, support and challenge. They cannot be addressed simply within the housing service. It may therefore be that they should be addressed in wider rethinking of corporate governance after the election, rather than as part of a strengthened Housing Improvement Plan.

It is clear from our conversations with executive councillors, the opposition front bench, and councillors generally in group meetings, that there is a widespread appetite, in both parties currently represented on the council, for all councillors to play a stronger part in understanding the performance of the housing service, challenging and scrutinising, and leading the implementation of change.

The preconditions for effective governance for the housing service, as across the council as a whole, are:

- Well-constructed constitutional arrangements.
- Strong processes for collecting and reporting key data on performance.
- Appropriate skills to exercise oversight (including knowledge of governance theory).
- Strong leadership at all levels adhering to Nolan Principles (Selflessness, Integrity Objectivity, Accountability, Openness, Honesty, Leadership).

The council's future approach to governance needs to involve:

- Effective assurance: assurance (having the information and skills to verify what is happening), is required, not reassurance (just asking someone else for a view).
- Change in organisational culture. Everything needs to be seen from the point of view of tenants and residents. This would apply across all the councils' public-facing activities, but in the housing service will also become a regulatory requirement enforced by the Social Housing Regulator.

- All councillors having a defined role which they are committed to carrying out effectively, including executive members, the opposition, scrutiny and front-line councillors.

If the council can put into place these components of strong governance, in future, it should be able to:

- Set a clear strategic direction for the service.
- Understand of the values and behaviours underpinning the services, modelled by leaders at all levels.
- Ensure strong oversight by the Mayor and Cabinet Member.
- Clear links into corporate oversight and strategy (including directorates working as one, and housing seen as central to delivery of the corporate plan)
- Rely on a consistent data set of key measures (including compliance, health and safety, repairs, tenant satisfaction), discussed with officers and used in decision making (not a tick box).
- Listen effectively to tenant feedback, through informal and formal means, and use it in decision making.

Our specific recommendations are:

- i. The Tenant Engagement Structure should be plugged formally and clearly into the council's governance. The approach needs to take account of recommendations in the 2020 All Party Report on Governance which have not been implemented. It needs to include specific and auditable commitments, for example on the regularity of meetings between leading active tenants, the Corporate Director, Chief Executive, Cabinet Member and Mayor.
- ii. The system for managing and recording complaints should ensure data is clear, including the outcomes of complaints and the timescales. Complaints data should be used intelligently to inform investment and shape preventive maintenance.
- iii. The new legislative requirements under the White Paper and Building Safety Bill should be built into the data framework.
- iv. There needs to be focused work to shift the organisational culture to one that empathises with the experience of tenants (see 3 below).
- v. The council needs to put in place a clear casework system which enables ward councillors and MPs to have visibility of the progress and outcomes of their referrals, and enables the council's leadership to assure the performance of the service in responding to casework.
- vi. After the May elections, the council should provide training, support and appropriate access to new and returning ward councillors to assist them in performing their important function – including a programme of regular stock visits and training on how to use visits to play their part in assurance.

3. Treating Tenants with Respect

There are three elements to treating customers with respect:

- The council must ensure their homes and surroundings are safe and in good condition, respond efficiently to repairs requests, concerns about internal and external communal places, anti-social behaviour and other matters, and put in place an efficient and effective complaints process which provides a speedy and effective resolution.
- Staff need to treat tenants with respect at all times, in written and face to face communication.
- There is already an active involvement structure for tenants and residents, with active tenants and residents and the supporting officer team working together to bring about good discussion and insight. As we make clear in 2 above, political and officer leadership needs to value it, and connect it fully into the council's governance processes.

The council's door-knocking programme last year resulted in over 650 responses. Its results are extremely informative, and it is an important start on putting tenants' experience at the heart of the running of the service. The Improvement Plan seeks to bring about improvement in all three of the areas set out above. Some tenants have fed back to us that they notice an improvement in the attitude and behaviour of council and Axis staff towards them.

However, performance data about the repairs service does not yet show any clear or consistent improvement. Feedback to the Board from tenants and residents continues to suggest high levels of poor service, including unacceptably lengthy delays in responding to correspondence, responses not addressing the issues raised, and lengthy delays in addressing evidently critical repairs and anti-social behaviour issues.

Feedback from tenants and communications we have seen between them and council officers still show that too often tenants are not being treated respectfully. The more frequent issue is not so much overt rudeness, but other behaviours, like failing to reply to correspondence, if only to acknowledge it, or representing periods of leave as an acceptable reason for failing to respond to urgent issues, are also indicative of a lack of respect. However, we have also heard of quite shockingly disrespectful behaviour, for example laughing at a tenant distressed about a critical repairs issue putting their family at risk.

Any landlord council would expect there to be a level of councillor and MP casework arising from a large housing stock. However, feedback from tenants and councillors suggests that failure to address issues through normal customer service processes results in a very high level of escalation. This is often the worst of both worlds, it is time-consuming and stressful for all concerned, yet brings about far too little practical improvement.

Current perceptions about respect for tenants

Enquiries and complaints not dealt with

I get an attitude of "it's not my job"

I don't know who my tenancy officer is to raise issues of concern

I am passed from pillar to post

I have never been given the name of the person dealing with an issue, so it doesn't get resolved

I am asked to provide evidence then told it's not enough (i.e., medical evidence/letter requested, provided by tenant at cost to them, then told its not acceptable)

Our caretaker gets frustrated with reporting upline as it falls on deaf ears

There is nothing we can do about that, "I am sorry"

Damp & Mold issues dismissed

Lack of Safeguarding

Delay in reports before repair is done

Wooderson Close Tenants ignored before 106 agreement made on relocation and are still being ignored as council officers will not meet to discuss relocation issues (note Cabinet Member ignoring tenant issues as well)

Not enough transparency and support on Housing List matters and rudeness and dismissive behaviour to discourage bidding

A lack of cohesion between departments and poor communication within housing department, not speaking with each other.

Housing Needs management and process poor resulting in families being in temporary accommodation to long.

Reported lifts broken (in disrepair for years) and communal doors also broken reported to repairs but no action result that pregnant mums and elderly affected and food deliveries not possible to residents.

Council homes lying empty due to work being delayed, has been empty for 10 weeks, enquiries by neighbor ignored

From Board Paper 'Respect for tenants, leaseholders & freeholders and effective communication' discussed at January board meeting

Nor can tenants active in the involvement structure currently have confidence that the concerns and input are being taken seriously. Members of the TLP worked hard to produce a serious report making proposals for improvement in the housing service, *The Way Forward*. It was submitted to the Cabinet Member and then interim Corporate Director in July 2021, but still has not received a response. Proper consultation about the annual rent increase is a basic, bread-and-butter process in any social landlord organisation. Its sensitivity and importance this year, in Croydon's particular context, should have been all the more apparent. Yet the council did not plan out the process for considering and agreeing it so that it could be considered at a meeting of the tenant and leasehold panel.

The current version of the Improvement Plan needs to be strengthened to include the following:

- i. Clear, timetable, targets, for recovering service performance on repairs and voids.
- ii. A Tenant's Charter, developed in close engagement with tenants. It needs to reflect their expectations and the Regulator of Social Housing's emerging framework for customer service.
- iii. Clear standards for communication, developed after extensive engagement and testing with tenants, in the involvement structure and more widely. A set of "for example" standards proposed by the tenant board members is set out below.

"For example" communication standards

- All telephone calls to be answered within five rings
- All emails to be answered within 48 hours
- All letters to be answered within five working days
- The officer to be named and contact details given to the Tenant/Resident dealing with the issue
- Interim updates to be given to the tenant/resident
- Matters raised to be resolved within 14 days or sooner

- iv. An acceleration of the very basic immediate action in the ARK report for tenants to have access to basic contact information via the website and handbook earlier than the currently proposed date of October 2022.
- v. An early discussion after the election about the tenant *Way Forward* report between the TLP, the Cabinet Member and the Corporate Director.
- vi. The actions proposed on complaints in the Improvement Plan should be addressed in a comprehensive review of the whole process, in which there needs to be strong engagement with active tenants and the wider tenant population.

4. Improving Data and its Use

In meetings and informally, board members have been discussing with officers how to address the poor quality of data about service performance, complaints and councillor casework. A strong data system needs to involve:

- Selecting the right datasets to provide the information needed to understand how the service is performing and track improvement.
- Ensuring that the processes for collecting and processing data are reliable.
- Clear, consistent, presentation of data to leaders and people involved in governance and scrutiny.

Some progress has been made, and we endorse the proposals in the plan for bringing about a data system along these lines. However, it is clear that there is a long way to go. There is an over-reliance on the repairs contractor for performance data and reporting. For example, at our February meeting, it became apparent that there is insufficient assurance that the process for triaging initial repairs reports into the correct level of urgency is actually sound. Without that assurance, the apparently high level of compliance with standards for the most urgent repairs is impossible to verify.

The Improvement Plan needs to be strengthened as follows:

- Control and assurance over the implementation of the new asset management system and migrating poor asset condition data into it.
- Ensuring performance reports show the level of backlog, as well as the number of repairs completed.

5. Staff capability

Putting in place permanent, committed, professional leadership, and the right capability in front line roles in the council and its contractors is clearly a vital precondition for successful improvement. There was an early and correct decision to bring the service together under a single corporate director, and a supporting leadership structure has been agreed. However, nearly a year on from the ITV stories and the ARK report, a permanent Corporate Director has only recently been appointed and will not take up post until May. Only four out of 13 other leadership roles in the service are currently filled on a permanent basis. This is no criticism of interim leaders, who have been working hard and making progress on the issues. However, the council has made improvement unnecessarily difficult by not making earlier progress to put in place permanent leadership. In front line roles, vacancies currently stand at 20% according to the best data available. (That there is no certainty about such a basic factual issue as the percentage of staff vacancies is, of itself, deeply concerning.)

Workforce is, rightly, one of the main elements of the Improvement Plan. We endorse the actions proposed there, but they will require continuing strong focus if the Plan as a whole is to succeed. We attach particular importance to the proposed development of a behavioural framework to address tenants' poor experience of staff behaviour, and the incorporation of that framework into staff performance management.

There should be a strong voice for staff in shaping improvement, both through effective general engagement and dialogue with the Trade Union Side.

Quality of Planning

We have engaged with officers as they have moved the plan on from its initial state, in which it was no more than a to-do list. It has improved considerably, in terms of clear definition of goals and how they will be measured and timetabling. However, the next version of the Plan needs, in addition, to contain the following elements:

- It needs to start by setting out a clear vision of the ways an improved service will change the lives and experience of tenants. This should be the subject of debate and engagement with tenants, but its basic components have been clear since the completion of the ARK report and would be shared by any social landlord organisation: homes which are sound and safe, and efficient and respectful customer service. Following our comments at our January and February meetings, the current plan contains a section "What difference will this make?", which provides a start, but we would urge that this is developed more fully into a set of clear statements of commitment, on the condition of properties, the standard of the repairs service, on minimising voids, and above all about respectful and inclusive behaviour. For example, we do not consider that "we will always *aim* [our emphasis] to treat [tenants] with respect and dignity" is strong enough. Respect is non-negotiable. Statements in the vision should be linked to clearly defined ambitions, for example in improved scores about respect and courtesy in feedback surveys.
- It needs to include a clear reconciliation between the activity proposed in it and the HRA Business Plan, to provide assurance that it is financially deliverable. Indeed, a key focus should be improving financial performance through effectively tackling voids, arrears and other areas of poor performance which adversely affect the bottom line. Effective tenant scrutiny has strong potential to assist with this.
- It needs to include a clear analysis of the main risks to the plan. One very obvious such risk is the re-procurement of the repairs service. The next version of the plan needs to set out the components of this risk and planned mitigations. A real focus is required to ensure the service is not allowed to deteriorate as the contract runs down.