

WEST NORTHAMPTONSHIRE COUNCIL CABINET

11 JUNE 2024

CABINET MEMBER FOR HOUSING – COUNCILLOR ROSIE HERRING

Report Title	Landlord Services 2023-24 Annual Performance Report including the Housing Ombudsman Self-assessment
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List of Approvers

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List of Appendices

- Appendix A – Northamptonshire Partnership Homes Annual Report 2023-24
- Appendix B – Tenant Satisfaction Measures Annual Report 2023-24
- Appendix C – NPH Tenant Satisfaction Measures Improvement Plan 2023-24
- Appendix D – Annual Complaints Performance and Service Improvement Report
- Appendix E – Housing Ombudsman Code Self-assessment
- Appendix F – NPH Complaints and Feedback Policy - March 2024

1. Purpose of Report

- 1.1. The purpose of this report is to provide Cabinet with an update on the performance of the Council's Housing landlord services, provided by the Council's Arm's Length Management Organisation, Northamptonshire Partnership Homes. This includes the outcome of the Tenant

Satisfaction Surveys as required by the Regulator of Social Housing, the Annual Complaints Performance and Service Improvement Report and self-assessment against the Housing Ombudsman Complaints Handling Code as required by the Housing Ombudsman Service.

2. Executive Summary

- 2.1 The content of this report and its associated appendices details West Northamptonshire Council's arrangements for the management of its housing stock with its ALMO, Northamptonshire Partnership Homes (NPH).
- 2.2 The report also includes the details of NPH's 2023/24 annual performance report and the outcome of the Tenant Satisfaction Measures which the Council are required to submit to the Regulator of Social Housing.
- 2.3 The content of this reports also sets out the new requirements the Council has as a Registered Provider under the new Housing Ombudsman Complaints Handling Code which became statutory from 1 April 2024.
- 2.4 The report outlines the governance arrangements in place between WNC and NPH for monitoring the performance of NPH when dealing with complaints to ensure the delivery remains compliant with the requirements.
- 2.5 The report also seeks approval of the required self-assessment submission to the Ombudsman and appointment of a Member Responsible for Complaints.

3. Recommendations

- 3.1 It is recommended that the Cabinet:
 - a) Note the contents of the report and Appendix A on the performance of Housing Landlord Services provided by NPH.
 - b) Note the outcome of the Tenant Satisfaction Survey results as detailed in Appendix B and associated NPH Improvement Plan detailed in Appendix C, ahead of the results being submitted to the Regulator of Social Housing.
 - c) Note the contents of Appendix D on the performance of complaint handling services provided by NPH.
 - d) Approve the self-assessment detailed in Appendix E for submission to the Housing Ombudsman and for publication on the Council's website.
 - e) Note Appendix F, NPH's Complaints and Feedback Policy ensuring compliance with the Code.
 - f) Approve the appointment of the Cabinet Member for Housing as the Member Responsible for Complaints in relation to complaints in scope of the Housing Ombudsman code.
 - g) Note the nomination of the Head of Housing Strategy and Partnerships as the senior lead person accountable for complaint handling under the Housing Ombudsman code.

4. Reason for Recommendations

- 4.1 Regular reporting to Cabinet on the performance of NPH is necessary to ensure the Council receives the necessary assurance as landlord and Registered Provider that its housing stock is being managed in accordance with the provisions within the Management Agreement and in line with the Council's expectations, and in accordance with relevant legislation and regulation.

5. Report Background

- 5.1 West Northamptonshire Council (WNC) is a Local Authority Registered Provider of social housing, owning over 11,400 residential properties. WNC is required to register with the Regulator of Social Housing and ensure that its landlord services are delivered in line with regulatory requirements. WNC is also required to subscribe to the Housing Ombudsman service as a provider of social housing.
- 5.2 The Social Housing Regulation Act (2023) introduced significant regulatory changes to the social housing sector, aiming to improve safety and provide tenants with greater powers and improve access to information. Some of the key changes introduced were:
- A proactive regulation regime by the Regulator of Social Housing, where all Registered Providers owning over 1,000 properties will be subject to 4-yearly inspections measuring their compliance with the regulatory standards. WNC are also required to adopt a co-regulatory approach with the regulator and make them aware of any issues of potential non-compliance.
 - Additional powers to the Housing Ombudsman, including introducing the first Statutory complaint Handling Code which came into effect from 1 April 2024.
- 5.3 Northamptonshire Partnership Homes (NPH) was formed in 2015 to take on the management of housing stock for Northampton Borough Council, now WNC. The company was formed as an ALMO (arms-length management organisation) and remains a subsidiary and provider of essential landlord services on behalf of WNC.
- 5.4 The key services that NPH currently provide are:
- Housing Management
 - Repairs and Maintenance
 - Tenancy support
 - Complaint handling
 - Tenant engagement
 - Investment of existing stock
 - New build housing development
 - Management of Ecton Lane traveller site
- 5.5 The Management Agreement between WNC and NPH sets out key performance indicators and delegates the responsibility for managing complaints made in relation to landlord services to NPH Officers and approval of an associated policy to the NPH Board. The indicators along with targets are agreed on an annual basis with performance and delivery against the targets monitored, on

a quarterly basis by the Management Agreement meeting. This meeting forms part of the WNC and NPH Governance arrangements adopted following Cabinet approval January 2023.

6. Issues and Choices

6.1 Annual Key Performance Indicators

6.1.1 NPH has provided a detailed summary on its performance against the agreed key performance indicators for 2023-24 financial year at Appendix A. A summary of the report includes:

- Ten measures achieving or overachieving the agreed target
- Two measures within agreed tolerances
- Nine measures that have not met target and are outside agreed tolerances.

6.1.2 The report highlights that all health and safety compliance areas remain at 100% on target.

6.1.3 The nine red measures that have not met target and are outside agreed tolerances are:

- Number of properties without an Electrical installation Certificate Report
- Fire Risk Assessment remedial repairs completed within target
- Damp, Mould and Condensation inspections appointments carried out in target
- Damp, Mould and Condensation follow up works completed in target time
- % of complaints responded to within Complaint Handling Code timescales
- % repairs completed within target timescale
- % reported fly tipped rubbish that NPH is responsible for removed within 5 days
- % Rent collected for traveller sites
- Proportion of homes that do not meet the Decent Home standard

6.1.3 For each of the red measures listed above NPH has provided additional information explaining the reasons for target being missed and what actions will be taken to improve performance within Part 2 (pages 5-17) of Appendix A.

6.1.4 The NPH report details a number of key strategic projects currently underway or set to be undertaken that will look to improve areas of underperformance, these include:

- Completion of 100% stock condition surveys to ensure the Council and its ALMO have the most up to date stock data to support asset investment priorities.
- An independent review of the responsive repairs service
- Introduction of a revised complaints process ahead of the 2024-25 financial year

6.1.5 Additional assurances have also been provided to WNC Officers and the Cabinet Member for Housing at the Quarterly Management Agreement meeting held on 15 May 2024. This meeting forms part of the WNC and NPH Governance arrangements adopted following Cabinet approval January 2023. Progress on improvement against these measures will continue to be monitored through the agreed governance structure and future reporting to Cabinet.

6.1.6 Also, in 2024/25 WNC will be working with NPH to ensure:

- We have a set of KPIs that reflect current requirements and the new regulatory regime
- Full validation of the data that sits behind the KPIs to give the Council confidence of and ability to clearly demonstrate compliance

6.2 Tenant Satisfaction Measures

6.2..1 The Tenant Satisfaction Measures (TSMs) were introduced by the Regulator of Social Housing in April 2023. WNC as a Registered Provider are required by the regulator to:

- Collect and process information specified by the Regulator relating to their performance against the TSMs.
- Annually publish their performance against the TSMs
- Annually submit to the regulator information specified by the regulator relating to their performance against those measures

6.2.2 NPH have collated the results of the TSMs on behalf of WNC through procuring an independent provider to carry out the surveys on our behalf, Acuity. A sample of 1,000 tenants have been surveyed by Acuity in line with the technical requirements of the TSMs set by regulator.

6.2.3 The full results of the TSMs are detailed in Appendix B. NPH have also created an improvement plan following the outcome of the TSMs detailing the key actions they will take in order to improve results for the 2024/25 financial year which is available at Appendix C

6.2.4 WNC are required to submit the outcome of the surveys along with an explanation of how the collection meets the technical requirements to the regulator by 30 June 2024. At the time of publication, NPH are still awaiting the supporting information on how the collection is in line with the technical requirements from Acuity, this supporting document will be reviewed by the Cabinet Member for Housing and the Director of Communities and Opportunities ahead of submission.

6.2.5 Following submission, the outcomes of the TSMs will be reviewed by the regulator to ensure they are in line with the technical requirements. The results of all Registered Providers will be published to provide tenants with the opportunity to compare the performance of their landlord with others. The results will also help inform the regulator's prioritisation of 4-yearly inspections of Registered Providers as introduced by the Social Housing Regulation Act (2023).

6.3 Annual Complaints Performance and Service Improvement Report

6.3..1 Section 8 of the Housing Ombudsman Complaint Handling Code states that *"Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:*

a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.

b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;

c. any findings of non-compliance with this Code by the Ombudsman;
d. the service improvements made as a result of the learning from complaints;
e. any annual report about the landlord's performance from the Ombudsman; and
f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord."

6.3..2 Appendix D details the annual performance of complaints management by NPH. The report also highlights and provides narrative from NPH on areas of improvement required moving forward. Scrutiny of this report has been undertaken via the quarterly Management Agreement meeting attended by the Cabinet Member for Housing and at EPB where members have had the opportunity to raise any specific issues and concerns. In future years, the Annual Complaints Performance and Service Improvement Report will be considered by the Council's Children, Education and Housing Overview Scrutiny Committee ahead of consideration by Cabinet, however this has not been possible this year due to the tight timescales for submitting the self-assessment to the Ombudsman following the introduction of the statutory code.

6.3..3 Section 9 of the code requires the Landlord to identify a suitably senior lead person as accountable for its complaint handling and member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC'). The Head of Housing Strategy and Partnerships will be nominated as the senior lead person and the Cabinet Member for Housing be appointed as the MRC.

6.3..4 Section 9.7 of the code states that *"As a minimum, the MRC and the governing body (or equivalent) must receive:*

a) regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;

b) regular reviews of issues and trends arising from complaint handling;

c) regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and

d) the annual complaints performance and service improvement report."

6.3..5 The MRC and senior lead person will carry out the requirements of their roles including monitoring the improvement areas identified in Appendix D through regular reporting on a quarterly basis via the WNC & NPH Management Agreement meeting.

6.3..6 Further reports on performance and compliance of all landlord services, including complaints handling will be presented to Cabinet on a quarterly basis.

6.4 Self-Assessment against the Code

6.4.1 WNC is required to approve the Self-Assessment as detailed in Appendix E that details how the NPH Complaints and Feedback Policy detailed at Appendix F complies with the code. Following approval, the self-assessment will be submitted to the Housing Ombudsman ahead of the 30

June deadline, as well as published on the Council and NPH's websites for tenants to access and view.

7. Implications (including financial implications)

7.1 Resources and Financial

There are no resources or financial implications arising from this report, financial monitoring of the Housing Revenue Account is reported to Cabinet separately. The nomination of a senior lead officer role identified within the body of the report will form part of existing an WNC role and will not require additional revenue funding.

7.2 Legal

There are no legal implications arising from this report. WNC are required to collate and submit the results of the Tenant Satisfaction Measures in line with the Regulator of Social Housing's Consumer Standards as prescribed in the Social Housing Regulations Act (2023). The recommendations of this report will also ensure the Council complies with the statutory requirements of the Housing Ombudsman Code.

7.3 Risk

There are no significant risks arising from the proposed recommendations in this report. WNC are however required to ensure that the delivery of landlord services complies with regulatory requirements set by the regulator. Failure to do so could result in WNC receiving a regulatory notice or intervention. Additional risk arising from the report are if the Council does not comply with the statutory requirements of the code, which could result in intervention from the Ombudsman and reputational damage. These risks are mitigated by having a compliant approach to complaint handling and the governance arrangements in place for the monitoring and reviewing of complaints.

Because of the potential reputational impacts, this links to **Strategic Risk SR02: NPH Residential – Change in Regulations**, which is currently summarised as follows:

Ref.	Summary	Gross Risk	Current Net Risk	Target Net Risk	Risk Owner	Cabinet Portfolio
SR02	<p>NPH Residential - Change in Regulations</p> <p>Recent change in regulations to have more emphasis on WNC managing the deliverables of NPH. Reputational, financial, H&S and legal risks of non-compliance.</p>	12	9	9	Director Communities & Opportunities	Housing, Culture & Leisure

7.4 Consultation and Communications

WNC are required to communicate performance results and TSMs results with Council tenants, the appendices detailed in this report will be made available on the WNC and NPH websites. WNC is also required to publish the self-assessment on the WNC and NPH websites for Council tenants to be able to view.

7.5 Consideration by Overview and Scrutiny

None

7.6 Climate Impact

There are no direct implications on climate impact from this report, it does however provide an update on performances measures relating to investment into the Council's housing stock which involves strategic aims of decarbonisation and sustainability.

7.7 Community and Poverty Impact

Ensuring the Council's housing stock is managed to a high standard play a vital role in ensuring the health and wellbeing of all Council tenants and leaseholders. Having a transparent and compliant approach to complaint handling ensures tenants are treated with fairness and respect, whilst learning embedded from complaints will improve service delivery and provide better outcomes for tenants

8. Background Papers

None