

## For General Release

<b>REPORT TO:</b>	<b>CABINET 26 JULY 2021</b>
<b>SUBJECT:</b>	<b>Housing Improvement Plan and Board</b>
<b>LEAD OFFICER:</b>	<b>Alison Knight, Interim Executive Director of Housing</b>
<b>CABINET MEMBER:</b>	<b>Councillor Patricia Hay-Justice, Cabinet Member for Homes</b>
<b>WARDS:</b>	<b>All</b>
<b>COUNCIL PRIORITIES 2020-2024</b> Implementation of the council's response to the independent investigation's recommendations through the Housing Improvement Plan, overseen by the independently chaired Housing Improvement Board, is essential in order to ensure that the council provides the best quality core housing management service that it can afford and provides value for money for its tenants and leaseholders.	
<b>FINANCIAL IMPACT</b> The financial impact of each workstream will be calculated and brought back to a future meeting of Cabinet, once the Housing Improvement Plan has been finalised and recommended to Cabinet by the Housing Improvement Board.	
<b>FORWARD PLAN KEY DECISION REFERENCE NO.:</b> Not a key decision. The completed Housing Improvement Plan will be brought to a future cabinet meeting for approval.	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

### 1. RECOMMENDATIONS

The Cabinet is recommended to

- 1.1 Note the further progress in improving housing conditions at 1-87 Regina Road and further actions in response to the recommendations of the report by ARK, detailed at Appendix 1.
- 1.2 Note the draft Terms of Reference of the Housing Improvement Board, detailed at Appendix 2, to be agreed under delegated authority.
- 1.3 Note the approach to development of the emerging improvement plan for the housing service to be put to the Housing Improvement Board for input.

## 2. EXECUTIVE SUMMARY

- 2.1 Following an investigation into the housing conditions at some council-owned flats at 1-87 Regina Road, ARK Consultancy published a report with recommendations for improvement. On 17 May 2021 Cabinet approved an initial action plan for the housing service and agreed to the establishment of an independently-chaired Housing Improvement Board. An interim Executive Director of Housing was appointed by the Interim Chief Executive for an initial period of six months to bring additional capacity to provide new leadership and direction for the housing service, conduct a review of the wider housing service, and lead the development and implementation of a longer-term Housing Improvement Plan for the service.
- 2.2 This report updates Cabinet on further progress to resolve problems at Regina Road and assist the residents affected, and actions taken to address the issues identified by ARK as requiring an immediate response. The report asks Cabinet to note the draft terms of reference of the Housing Improvement Board that will oversee implementation of the Housing Improvement Plan and ensure that tenants and leaseholders have a say in shaping the future of the housing service. The report also asks Cabinet to note the approach to development of the emerging Croydon Housing Improvement Plan for the housing service, to be put to the Housing Improvement Board for further shaping and development. The Improvement Plan will address ARK's recommendations for improvement and ensure the council delivers the best core housing service that it can afford, in line with its priorities, and demonstrates to the Regulator of Social Housing that it how it will remedy its breach of the Home Standard and the Tenant Involvement and Empowerment Standard. Once developed, the Plan will return to a future meeting of Cabinet for adoption.

## 3. BACKGROUND

- 3.1 The council commissioned ARK Consultancy (ARK) to conduct an urgent independent investigation to understand the circumstances that led to residents of three Croydon Council-owned flats at 1-87 Regina Road, South Norwood living in the conditions as publicised in the national news report on 22 March 2021. The council also referred itself to the Health and Safety Executive (HSE) and the Regulator of Social Housing.
- 3.2 The investigation identified no single reason as to why the situation at Regina Road occurred. ARK's report stated that these issues represented *'a failure to deliver even basic 'core' housing services effectively. They are potentially symptomatic of poor performance across the council's housing service and impact on its ability to drive for self-improvement'*. The five key findings about the housing service were:
- a lack of capacity and competence;
  - a poor operating culture with a lack of care and respect for tenants;
  - systemic problems in how the council communicates and deals with tenants' concerns and complaints;
  - weak performance management, meaning senior managers do not appear to know what is going on; and

- poor use of data and ‘intelligence’ by the council and its contractors.
- 3.3 ARK’s report recommended, as an immediate action, the realignment of resources to establish:
- a team focussed on policy and performance and control of service delivery.
  - a team focussed on improving investment planning to ensure homes are sustainable over the longer-term.
  - a strategic group with the power to oversee the development and implementation of a recovery plan and to direct the initial work of the investment planning and control teams.
- 3.4 ARK also made recommendations for improvement in seven areas, on governance and strategic leadership of the housing service; workforce planning and skills development; cultural and behavioural change both of council staff and contractor operatives; tenant involvement; business intelligence; performance management; and complaints handling.
- 3.5 The HSE decided not to pursue any action against the council. However, the Regulator of Social Housing issued a regulatory notice on 20 May 2021, detailing its conclusion that the council had breached the Home Standard and the Tenant Involvement and Empowerment Standard and that consequently there was actual and potential serious detriment to council tenants. The Home Standard requires registered providers to have a cost-effective repairs and maintenance service and to meet all applicable statutory health and safety requirements. The Tenant Involvement and Empowerment Standard requires registered providers to treat tenants with fairness and respect and to have an approach that ensures complaints are resolved promptly, politely and fairly. The regulator stated that it would work with the council as it sought to remedy this breach, including monitoring how it delivered its improvement programme and mitigated risks to tenants throughout. It also stated that it would keep under review whether further regulatory action was necessary.
- 3.6 The council appointed an Interim Executive Director of Housing, who started on 24 May 2021, and Cabinet approved an [Initial Action Plan](#) on 17 May 2021.

## **4 IMPROVEMENT UPDATE**

- 4.1 There has been progress in implementing the initial action plan developed in response to the ARK report and approved by Cabinet on 17 May 2021. The table at Appendix 1 details progress made in addressing each of the 12 Issues Requiring an Immediate Response identified by ARK. These are reported under the headings:
- Compliance and fire safety
  - Repair issues at Regina Road
  - Culture and behaviours
  - Resident engagement and accessibility of the housing service
  - Contract management
  - Asset management.

- 4.2 Development of the council's Cultural Transformation Programme is underway and will also address the need to transform the culture of the housing service while enhancing skills and capability.
- 4.3 A number of operational and strategic meetings and workshops have been held with Axis to consider future development of the relationship between the council and its main contractor. The council is reviewing cases involving high levels of spending and properties with a high volume of repairs jobs and using this data to identify properties that may need more preventative work or an alternative approach.
- 4.4 A deep cleaning regime has been established for all high rise blocks in Regina Road, with a dedicated caretaker now attached to the estate. Tenants have expressed their appreciation to caretakers. The deep clean schedule is being re-introduced across the borough, replacing temporary arrangements introduced to ensure service continuity during the pandemic.
- 4.5 Officers are improving resident engagement to increase their visibility and accessibility and help to develop a resident-focussed housing service. Roadshows will take place around the borough between July and September. This initiative was piloted at Regina Road and welcomed by residents.
- 4.6 A full and comprehensive technical assessment of the council's 26 tower blocks is underway, beginning with seven blocks in South Norwood, Waddon and New Addington North wards (including all three blocks in Regina Road). Once completed, the scope of works will be defined and specifications and technical drawings produced, before delivery of the programme of works commences.
- 4.7 Understaffing was identified by ARK as a contributory factor. The following posts are being recruited to in the housing service:
- Interim Head of Repairs and Maintenance, started on 28 June
  - Compliance Manager, recruited and starting on 2 August
  - Senior Fire Safety Surveyor, at interview stage
  - Two principal asset management analysts (one a secondment); the permanent post at interview stage, the secondment offered and accepted.
  - Recruitment to fill caretaker vacancies is underway.

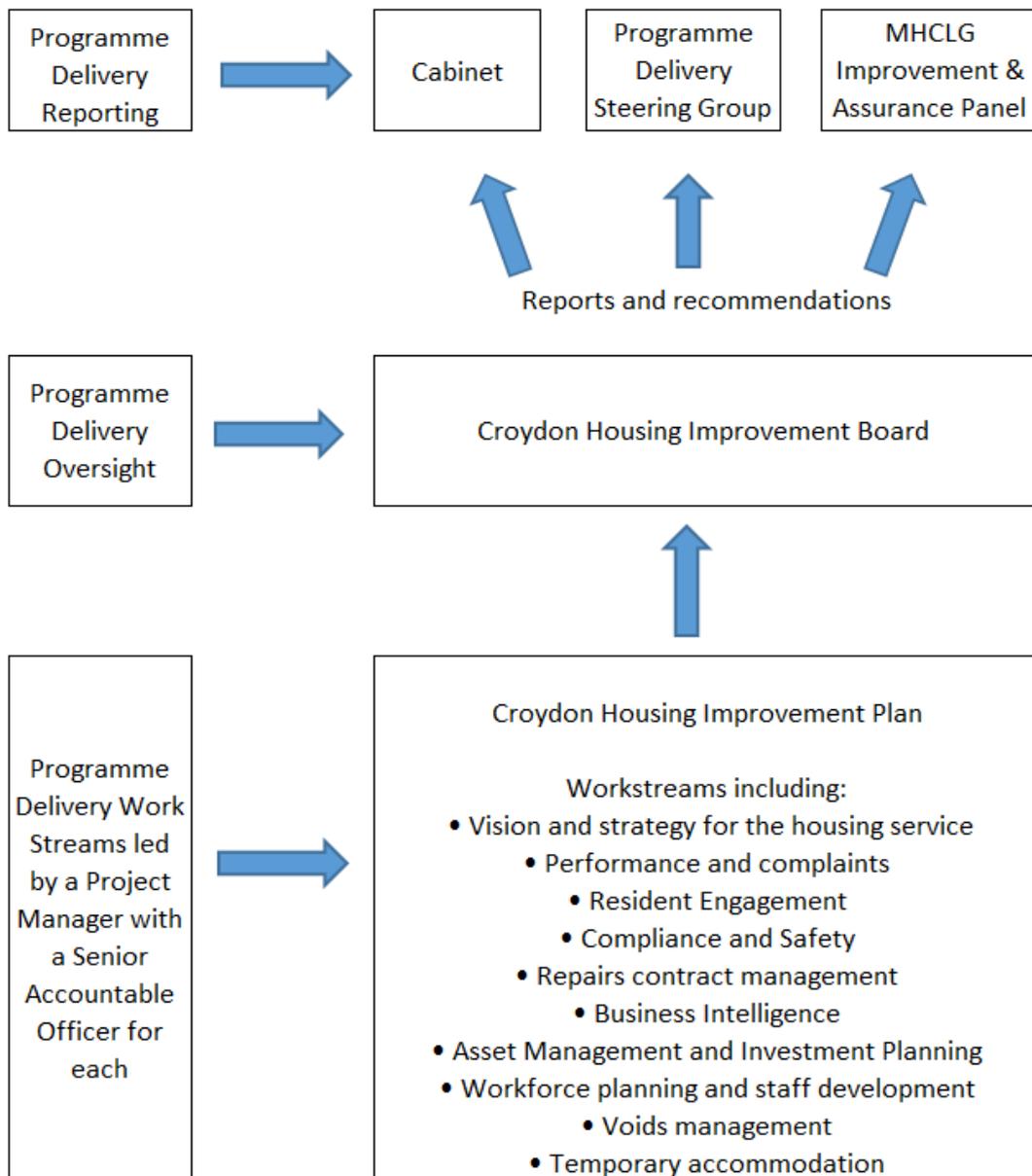
## **5 HOUSING IMPROVEMENT BOARD**

- 5.1 The Housing Improvement Board will be an independently chaired body reporting and making recommendations to Cabinet. It will influence development of the Croydon Housing Improvement Plan (CHIP), and recommend it to Cabinet for adoption. While the Board will not be a decision making body; its focus will be on commenting on whether or not the council is achieving what it set out to do in the Improvement plan. It will hold the council to account for its delivery. The Board's draft Terms of Reference are at Appendix 1 and its part in the arrangements for the CHIP is illustrated in Figure 1 below.
- 5.2 The Board will provide support, external challenge and oversight that ensures council officers deliver the outcomes of the CHIP, which reflect the aims of the

Social Housing White Paper – “The Charter for Social Housing Residents” - with particular emphasis on 1- 6 below):

1. To be safe in your home.
  2. To know how your landlord is performing.
  3. To have your complaints dealt with promptly and fairly.
  4. To be treated with respect.
  5. To have your voice heard by your landlord.
  6. To have a good quality home to live in.
  7. To be supported to take your first steps to ownership.
- 5.3 It will ensure the council is constantly seeking to learn from best practice elsewhere and builds a learning methodology into its improvement work. The Board will be able to invite external advice where relevant.
- 5.4 The Board will comment on the council’s work in relation to the Regulator of Social Housing (RSH) and make recommendations to assist the Council to ensure it resolves the current breach and regains the confidence of both the Regulator and council tenants.
- 5.5 It will recommend the agreement of a communication plan and implement it to ensure that stakeholders including residents are both updated on progress and have the opportunity to challenge the delivery of the CHIP.
- 5.6 The process for choosing the independent chair of the Board will be agreed by the Interim Executive Director of Housing, the Leader and Cabinet Member for Homes.
- 5.7 The Board’s membership will include resident representation and reflect the diversity of the borough, so that it has a strong, authentic resident voice. It is critical that the lived experience of residents is heard, understood and responded to. In addition to its independent chair, it will comprise:
- Three representatives of Croydon tenants and leaseholders (including from Regina Road)
  - Tenants & Leaseholder Panel (T&LP) member
  - Croydon Improvement and Assurance Panel representative
  - Local Government Association representative
  - Housing Association/London Council - housing representative
  - Representative(s) of the voluntary and community sector in the area(s) of family support &/or, housing experience &/or equality and diversity.
- 5.8 Elected members, including the Leader and Cabinet member for Homes, and officers, including the Chief Executive and Executive Director of Housing, will be in attendance in an advisory capacity. Others will be invited as required, including the Chairs of the General Purposes and Audit Committee (GPAC) and the Scrutiny and Overview Committee (S&OC).
- 5.9 Meetings of the Board will be held in public and consideration will be given to webcasting board meetings. Members of the public may therefore attend as observers. The Board will be able to receive representations from members of the public and have a question and answer session.

**Figure 1: Arrangements for delivery of the CHIP**



## 6 HOUSING IMPROVEMENT PLAN

6.1 The Housing Improvement Plan will build on the recommendations of the ARK Report and the initial action plan adopted by Cabinet on 17 May 2021. Through it, the council aims to deliver the best core housing service for residents that the council can afford, in line with its priorities, and will demonstrate to the Regulator of Social Housing how it will remedy its breach of the Home Standard and the Tenant Involvement and Empowerment Standard. It will put in place strengthened governance and management controls, improved tenancy engagement and robust asset management plans, measured by key performance indicators, to ensure council housing across the borough is safe, warm and decent for our residents.

6.2 The key work streams of delivery include:

1. Vision and strategy for the housing service
2. Performance and complaints
3. Resident Engagement
4. Compliance and Safety
5. Management of the Repairs Contract
6. Business Intelligence
7. Asset Management and Investment Planning
8. Workforce Planning and Staff Development
9. Voids management
10. Temporary Accommodation.

- 6.3 The Housing Improvement Plan will incorporate the work required by the Regulator of Social Housing including the voluntary undertaking about improvements to the housing service that the council will make to the Regulator. The Compliance and Safety workstream will include ensuring compliance with the key provisions in the Building Safety Bill and Fire Safety Bill.
- 6.4 The council's commitment to equality, diversity and inclusion will be integral to each of the work streams listed above.
- 6.5 The Improvement Plan will be a series of workstreams rather than part of the council's housing strategy, but the workstreams will lead to the development of various policies and plans which will support the Housing Strategy and which will be presented to the relevant decision maker, Cabinet or Full Council, as they need to be taken. Development of the Plan will be overseen by the Housing Improvement Board, with input from Board members, including resident representatives. It will also be informed by resident feedback from a 'roadshow' door-knocking exercise between July and September 2021.
- 6.6 The Board will recommend the completed Housing Improvement Plan to a future meeting of Cabinet for consideration and adoption.

## **7. CONSULTATION**

- 7.1 As part of its independent investigation, ARK interviewed council staff, councillors and stakeholders as well as tenants from 1-87 Regina Road. Officers and elected members have held a number of meetings with tenants in the council owned blocks in Regina Road.
- 7.2 Officers are organising a 'roadshow' door-knocking exercise across the borough between July and September 2021 to create opportunities for residents to share their experiences of the council's housing services. The feedback residents provide will help to inform the housing improvement plan and deliver a truly resident-focussed housing service. A similar approach has been piloted over the past few weeks at Regina Road with a dedicated team comprising a tenancy sustainment officer, resident involvement officer, community development officer, repairs inspector and caretaker onsite.
- 7.3 Membership of the Housing Improvement Board will include resident representation and reflect the diversity of the borough, so that it has a strong,

authentic resident voice. The council will consider webcasting board meetings and how best to use social media to support resident engagement. It will also consider holding meetings in a hybrid manner to enhance inclusivity so that people with disabilities and / or caring responsibilities can put themselves forward as a board member or observer. It is critical that the lived experience of residents is heard, understood and responded to. In this way the council intends to develop the Housing Improvement Plan with tenants and leaseholders.

- 7.4 The council is consulting with the Regulator of Social Housing and the MHCLG Improvement and Assurance Panel on the Housing Improvement Board Terms of Reference and the Housing Improvement Plan.
- 7.5 The Housing Improvement Plan will be informed by input from the Housing Improvement Board and the Tenants and Leaseholders Panel. Officers will engage with the Tenants and Leaseholders Panel to improve learning from their previous engagement processes.

## **8 PRE-DECISION SCRUTINY**

- 8.1 The draft cabinet report and appendices were presented to the Streets, Environment and Homes Scrutiny Sub-committee on 13 July 2021 for pre-decision debate. The sub-committee made the following recommendations.
- 8.2 Communication and residents' engagement
1. A communications and engagement plan was needed to map out all the one-off engagement exercises as well as new communication practices to be embedded in new improved ways of working. That plan should be informed by involving the Tenants and Leaseholder panel, including in the development of the new Tenant Handbook.
  2. Further consultation with residents was needed during roadshow exercises, engagement with Residents Associations and Tenants Forums as well as through the Tenants and Leaseholder Panel to identify what they would like to see be made publicly available to further enhance transparency on the progress of the delivery of the Housing Improvement Plan
  3. Work was needed to improve communication with tenants on planned works / planned surveys. Should work be delayed or the original stated deadline missed (often due to reasons beyond officers' control), tenants should be kept informed, so they do not feel that it is a case of just nothing happening.
  4. There needed to be better communication of the responsive repairs contract's social value, including apprenticeships (opportunities and about the types of roles they can lead to)
  5. There needed to be a better corporate definition of what constitutes a complaint and improved understanding of this, and a streamlined complaints process which should be promoted amongst council tenants and leaseholders.
  6. It was recommended that support be given to the initiative of the Tenants and Leaseholders Panel in the development of a Tenants Charter
  7. It was recommended that a diagram be produced to map out the communication routes of casework, enquiries, complaints and the escalation process to clarify to councillors and MPs ways of escalating

urgent housing casework, as current guidance provides a 10 day turnaround which was not adequate for urgent housing case work.

8. Further consideration was needed on the recommendation in Government's Housing White Paper on the use of technology and how it could be incorporated into one of the workstreams of the Housing Improvement Plan. This should include:-
  - The exploration of best practice and existing software packages on tenancy management, repairs and other housing issues and any that are used for general housing communications.
  - Consultation with the Tenants and Leaseholder Panel meeting on use of technology to inform this work.

### 8.3 Housing Improvement Plan Workstreams

9. It is recommended that a plan for the strategy development in Workstream 1, including indicative timescales, be developed and shared with the Sub-Committee once available.
10. Workstream 7 should be expanded to include in its scope the issue of buildings nearing the end of their life, with further consideration given to how these options are to be assessed, including in relation to the future of some Brick by Brick sites in the vicinity of some of these buildings
11. Workstream 8 needs to address the issue of resourcing, workload allocation and management within the service. Staff can be given the right skills and cultural/behaviour training but if their workloads are still unmanageable as highlighted in the ARK report, they will be set up to fail. This workstream should also include within its scope long-term workforce planning and apprenticeships.

### 8.4 Board Terms of Reference (ToR)

12. Further work should be undertaken to consider best practice on the set-up of the Housing Improvement Board, particularly regarding membership and review/consider the following before finalising the ToR, including:
  - Number of tenant representatives
  - Ensuring that tenant representatives are not only from formal Residents Associations and Tenants Forums, as many areas where the council has housing stock where there is no residents association
  - Backbencher representation and/or mechanism for backbenchers' input
  - Meeting observers
  - Webcasting of meetings
  - Holding meetings in a hybrid manner to enhance inclusivity so that people with disabilities and / or caring responsibilities can put themselves forward as board member/observer
  - Term of the chair (elected/number of mandates/criteria/skills, experience and behaviours required)
13. It is requested that the revised ToR are circulated to the Sub-Committee before approval and to ensure the ToR included as appendix marked as draft in the cabinet report.
14. The Housing Improvement Board once set up should be given a role to inform the budget setting process (Medium Term Financial Strategy as well as Housing Revenue Account (HRA) and the upcoming HRA review (if the timings of the review allow).

## **9 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

- 9.1 There are no immediate implications for additional staffing, other revenue or capital costs arising from creating the Housing Improvement Board as the initial assumption is that additional work involved in reporting to the board can be managed within the existing establishment.
- 9.2 The financial impact of implementing the Initial Action and Improvement plan will include an unquantified increase in responsive repairs costs; additional staffing costs to create the Policy and Performance and Investment Planning teams; an increase in training and development and other HR support costs and the cost of investment in digital systems and reporting tools (Business Intelligence). Detail of the plans for this increased spend will need to be approved via appropriate governance mechanisms. The financial impact of each workstream will be calculated and brought back to a future meeting of Cabinet, once the Housing Improvement Plan has been finalised and recommended to Cabinet by the Housing Improvement Board.
- 9.3 The Responsive Repairs budget is £14.18m for 2021-22 and the base budget for Planned Maintenance work is £26.771m. Both of these budgets will need to be reviewed for 2021-22 and future years to ensure that assets are appropriately maintained, tenants are provided with services that are fit for purpose and that the long term financial stability of the Housing Revenue Account (HRA) is secured.

### **The effect of the decision**

- 9.4 The challenge will be to ensure that robust controls and monitoring measures are in place around the implementation of improvement plans that must be set out in more detail at a later date.

### **Risks**

- 9.5 In developing its action plan the council recognises the importance of listening to its tenants and leaseholders in identifying and reducing risk to them and for the council. There is a long term financial risk in insufficiently investing in HRA assets that must be considered in reviewing and setting the budget.

### **Options**

- 9.6 The plan will include a review of the Housing Revenue Account (HRA). The options to best meet the needs of council tenants and to manage and maintain the HRA stock should be considered as plans are developed. This will include looking at contracts and building maintenance and considering value for money and the quality of work.

### **Future savings/efficiencies**

- 9.7 No opportunities for savings or efficiencies are presented at this stage of the review process. The HRA operates as a self-financing ring-fenced account with a 30-year business plan to aid in financially managing the account on a long term basis. The impact of making changes to the revenue budget or planned maintenance programme (capital spend) should be tested within the business plan to ensure sustainability of reserve and borrowing levels.

Approved by: Sarah Attwood, Interim Head of Finance

## **10. LEGAL CONSIDERATIONS**

- 10.1 The Head of Litigation and Corporate Law comments on behalf of the interim Director of Law and Governance that the Council is generally responsible for making sure the structure of rented property is kept in good condition (which includes the walls, ceiling, roof and windows); gas and electricity appliances work safely; and shared parts of a building or housing estate are kept in good condition.
- 10.2 The Council's Tenancy or Lease Agreements set out express terms in relation to both the rights and obligations of the Landlord and the Tenant regarding repair and maintenance responsibilities.
- 10.3 Whether a housing disrepair claim can be made against the Council, principally arises out of contract and statute law.
- 10.4 The basis of a claim can arise under s.11 of the Landlord and Tenant Act 1985 (LTA 1985). In addition, repairing obligations are implied in certain circumstances pursuant to a range of other legislation such as the Defective Premises Act 1972. There are also some standard implied terms developed by the Courts that:
- 1) if a landlord carries out repairs, they must be done with reasonable skill and care using proper materials; and
  - 2) a landlord must not derogate from its grant. This means where a landlord has taken steps, or granted rights to another party, which render the premises unfit or unsuitable for the purpose for which they were let.
- 10.5 Failure to comply with these implied terms can result in a civil claim for damages and specific performance. A claim for compensation can also be made under the Housing Act 1985. Claims in common law nuisance or negligence can similarly arise. Allegations of statutory nuisance can also be pleaded in the Magistrates' Court under the Environmental Protection Act 1990 where this is evidence to support such a claim. A housing conditions claim may include a personal injury element.
- 10.6 Separately the Homes (Fit for Human Habitation) Act 2018 contains implied covenants that residential rented accommodation is provided and maintained in a state of fitness for human habitation.
- 10.7 The Housing Ombudsman (THO) established under the Housing Act 1996 (as amended by the Localism Act 2011) is responsible for investigating complaints about member landlords in accordance with a scheme approved by the Secretary of State. The role of THO is to seek to resolve disputes involving members of the Scheme, including making awards of compensation or other remedies when appropriate, and to support effective landlord-resident dispute resolution by others.
- 10.8 In addition, the Housing and Regeneration Act 2008 established the Regulator of Social Housing (RSH) an executive non-departmental public body of the MHCLG. The RSH sets regulatory standards, codes of practice and guidance for registered providers of social housing. The regulator will consider complaints

and referrals to determine whether there is evidence of a breach of its regulatory standards. The Council has self-referred itself to the regulator.

- 10.9 The *Charter for Social Housing Residents – the Social Housing White Paper* published in November 2020 sets out actions the government propose to take to include a Charter for Social Housing Residents, plans for new regulation, a strengthened Housing Ombudsman to speed up complaints, and a set of tenant satisfaction measures that social landlords will have to report against.
- 10.10 The Local Government Act 1999 imposes a requirement on all local authorities to deliver 'best value' which requires the Council to demonstrate that it is making arrangements that are economic, efficient and effective and the Council has had regard to the need to secure continuous improvement in how it carries out its work.
- 10.11 As various workstreams which form part of the proposed Croydon Housing Improvement Plan are brought forward for decision, additional legal advice may be required regarding implementation.

Approved by Sandra Herbert, Head of Litigation and Corporate Law, on behalf of the Interim Director of Law and Governance & Deputy Monitoring Officer

## **11. HUMAN RESOURCES IMPACT**

- 11.1 The Cultural Transformation Programme is essential for successful implementation of the Housing Improvement Plan. The programme will establish and strengthen the behaviours required to transform the housing service, along with the rest of the Council, so that services are delivered in a financially disciplined and motivated way. It will include a programme of training for tenancy officers on setting new standards, bench marking our services and ensuring that outmoded attitudes are addressed. There will be training sessions around customer service, equality and diversity and unconscious bias. Staff will have clarity on what they have to deliver and have the skills and tools to fulfil their roles effectively, while managers will consistently model the Council's values and behaviours, use systems and data to drive improvement and identify and manage poor performance early.
- 11.2 The senior management restructure and any future planned service changes, will be conducted in accordance with the council's organisational change policies and procedures and consultation with staff and trade unions.

Approved by: Sue Moorman, Director of Human Resources

## **12. EQUALITIES IMPACT**

- 12.1 The Housing Improvement Plan will build on the [initial action plan](#) approved by Cabinet on 17 May 2021 which will achieve an improvement in the quality, visibility, accessibility and responsiveness of the housing service to the needs of all tenants and leaseholders and improve housing conditions in council homes for all tenants. The [equality analysis](#) carried out on the initial action plan

found that there were no negative impacts for people with protected characteristics.

- 12.2 The ARK report found no clear evidence of racial discrimination, but did find that there were wider issues, with all tenants being seen as less worthy of respect. Immediate measures are under way to improve the operating culture and attitude of staff toward tenants and a longer term cultural transformation programme is being planned to ensure council staff and contractor operatives consistently deliver a tenant-focussed service and have a culture of 'safety first', respect and empathy for tenants. The Council will ensure staff are aware of its Code of Conduct, Commitment to Equality and Equality in Employment Policy, and complete Equality and Diversity ELearning.
- 12.3 Given the high percentage of households from black and ethnic minority backgrounds in the Regina Road flats in particular, among homeless households and council homes generally, compared with the borough as a whole, the work to improve council homes will have a positive impact. This is also true of the planned wider ranging review of the housing service – including the quality and cost of temporary accommodation and the review of historic housing allocations (as the percentage of tenants of flats in Regina Road who are from BAME communities is disproportionately high, compared to the percentage of Croydon Council tenants generally and the population in the borough) and assessment of the housing need of those who need to move to larger accommodation, which will lay the basis for a longer term plan for further improvements to the housing service.
- 12.4 The Housing Improvement Plan will need to take account of the needs of vulnerable tenants, some with other protected characteristics, such as disabilities, to ensure that the housing service is responsive to their needs and works with other council services, such as children's services and adult social care, as well as services from external organisations.
- 12.5 As part of its investigation, ARK interviewed council staff, councillors and tenants from 1-87 Regina Road. Residents of the three blocks at Regina Road have also met with the Leader, Cabinet Member and Ward Councillors. The wider review of the housing service will consider in particular how the council fully involves all its tenants and leaseholders, both in terms of responding to issues raised and in the co-design and co-delivery of services.
- 12.6 A representative of the Tenants and Leaseholders Panel and additional three tenants will be included in the membership of the Housing Improvement Board that will oversee the review as well as the development and implementation of the more detailed Housing Improvement Plan. Tenants directly affected by the Regina Road situation have been invited to take part. The Council will ensure that the resident participation is representative of the diversity of council tenants and leaseholders generally and the tenants who occupy the Regina Road flats in particular. The council will consider holding meetings in a hybrid manner to enhance inclusivity so that people with disabilities and / or caring responsibilities can put themselves forward as a board member or observer.

Approved by Gavin Handford, Director of Policy and Partnership

### **13. ENVIRONMENTAL IMPACT**

13.1 There is no environmental impact arising from this report.

### **14. CRIME AND DISORDER REDUCTION IMPACT**

14.1 There is no crime and disorder impact arising from this report.

### **15. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

15.1 This report informs Cabinet of the further progress made in improving housing conditions in council blocks at Regina Road and rebuilding the housing service and increasing resident engagement. It seeks approval for the Terms of Reference for a Housing Improvement Board to inform development of an improvement plan and oversee and challenge the Council's delivery of it. The report also asks Cabinet to note the approach to development of the emerging improvement plan for the housing service to be put to the Housing Improvement Board for their input.

### **16. OPTIONS CONSIDERED AND REJECTED**

16.1 None

### **17. DATA PROTECTION IMPLICATIONS**

17.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

**YES**

17.2 **HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

**NO**

The Interim Executive Director of Housing comments that the housing conditions experienced by tenants of 1-87 Regina Road and other council properties have been noted in order to arrange repair, and their housing needs have been recorded in order to arrange alternative accommodation where this is appropriate. Personal data held as part of housing IT systems within the council is managed carefully and shared with contractors and partners only as appropriate, in line with GDP regulations.

The management and use of personal data to inform the investigation, this report and the subsequent action plan will not vary from established systems and data management that are deemed compliant with GDP regulations.

Approved by: Alison Knight, Interim Executive Director of Housing

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**CONTACT OFFICER:** John Montes, Senior Strategy Officer, 020 8726  
6000 ext 61613

**APPENDICES TO THIS REPORT**

Appendix 1 – Progress on Issues for Immediate Response identified by ARK

Appendix 2 – Housing Improvement Board Draft Terms of Reference

**BACKGROUND PAPERS:** None