

## INITIAL ACTION PLAN

**Key: IIR – Issue for Immediate Response (listed at 4.5 in the report); IA – Immediate Action; R - ARK recommendation**

**Remaining timescales and accountability to be determined once Interim Executive Director of Housing has been appointed**

**ARK Immediate Action A: Policy, Performance and Control of Service Delivery**

“Establish a ‘team’ (or project group) focussed on policy and performance and ‘control’ of service delivery. This team should work in a co-ordinated way to oversee and report ‘independently’ on all aspects of housing performance (including a review of historic allocations), programme delivery, disrepair cases and landlord’s health and safety (currently part of the Compliance Team). The team should be able to provide ‘expert’ support to operational teams and work with them (and contractors) to develop policies and procedures, technical standards and specifications and to support improvements in complaints handling and contract management”

<b>No.</b>	<b>Action</b>	<b>Timescale</b>	<b>ARK recommendation addressed (key above)</b>	<b>Accountability</b>
1	<p><b>Establish a team focussed on policy and performance and control of service delivery:</b></p> <ul style="list-style-type: none"> <li>• to provide expert support to operational teams and work with them and contractors to develop policies and procedures, technical standards and specifications.</li> <li>• to ensure compliance with those policies and procedures, overseeing and reporting on all aspects of housing performance (including a review of historic allocations), programme delivery, disrepair cases and landlord’s health and safety.</li> <li>• to support improvements in complaints handling and contract management.</li> </ul>	Staffing and resource plan complete by end of May 2021	IA A	New Interim Executive Director of Housing (Interim ED Housing)

No.	Action	Timescale	ARK recommendation addressed (key above)	Accountability
2	<p><b>Disruptive work may have compromised fire safety measures:</b></p> <ul style="list-style-type: none"> <li>• Recommendations in fire risk assessment reports are made into works orders for immediate attention in the small number of cases that are rated as high priority; otherwise they fed into the planned maintenance programme. The council has sought independent assurance by instructing a specialist housing and repairs consultancy to undertake from 10 May 2021 a random dip test of homes that were subject to a high priority repair item to provide assurance, or to inform the need for further compliance audits in the months ahead.</li> <li>• The door to a flat that is vacant, pending the repair of damage caused by the leak, will be replaced as specified by the fire risk assessment, as part of those repairs.</li> <li>• Remove two remaining items to the rear of the block and continue removal of residents' items that remain in communal areas, following communication with tenants.</li> </ul>	From 10 May 2021	IIR – iv	Director of Homes and Social Investment (Dir H&SI)
3	<p><b>Resource the compliance function by</b> completing the recruitment to the following posts:</p> <ul style="list-style-type: none"> <li>• Compliance manager</li> <li>• Senior Fire Safety Compliance Surveyor</li> </ul>	Recruitment underway (interviews on 17 May)  (closing date of 19 May for applications)	IIR – i	
	As at 4 May 2021, 98.68% of all council social housing homes had a valid gas safety certificate. 39 homes were subject to enforcement action to ensure gas appliances are serviced. The level of non-compliance has fallen from 276 homes on 9 April to 172 homes (1.32%) without a valid certificate on 4 May.		IIR – i	Dir H&SI

No.	Action	Timescale	ARK recommendation addressed (key above)	Accountability
4	<p>Introduce longer term improvement measures to achieve 100% compliance on all gas safety matters (currently 98.68% at 4 May 2021):</p> <ol style="list-style-type: none"> <li>1. Reducing the time taken to apply enforcement actions - currently, there is a 4 stage process and we wish to examine the implementation of a swifter 3 stage process</li> <li>2. Independent verification of compliance testing will ensure performance data is accurate at all times - we will seek to appoint independent auditors to provide verification of performance data and overall compliance levels</li> <li>3. Robust weekly reporting of compliance reporting to Director level</li> </ol>	From May 2021		
	<b>Management of contractor contract</b>		IIR – viii	
5	<p>Interim ED/Director attendance at contract management meetings Complete the recruitment to the vacant post of head of repairs and maintenance.</p>	<p>Started &amp; ongoing  Recruitment happening now</p>	IIR – viii	<p>Interim ED Place/ Interim ED Housing  Dir H&amp;SI</p>
6	<p>Focus discussions between the council and its main contractor on actively managing performance through examining performance data to identify trends and working together to resolve operational problems and improve continuously;</p>	To start May 2021	IIR – viii	Interim ED Housing
	<b>Allocations, overcrowding within the block, and tenants' understanding of their tenancy status:</b>		IIR – v	
7	<p>Conduct an audit of allocations to flats in Regina Road (against the allocations policy)</p>	Scope defined in May 2021	IIR – v	Dir Housing

<b>No.</b>	<b>Action</b>	<b>Timescale</b>	<b>ARK recommendation addressed (key above)</b>	<b>Accountability</b>
8	Ensure all tenants (particularly non-secure tenants) understand their tenancy status.	To start May 2021 and ongoing	IIR – v	Dir Housing
9	Identify overcrowded households and discuss options for moving to more suitable accommodation	To start May 2021 and ongoing	IIR – v	
10	Develop policy and practice (including service standards) for the housing service having regard to good practice and benchmarking with other local authorities and registered providers.	As part of improvement plan	R1	Interim ED Housing

### **ARK Immediate Action B: Investment Planning**

“Establish a ‘team’ (or project group) focussed on improving investment planning to ensure homes are sustainable over the longer-term. This team should focus immediately on developing a robust short-term investment programme that includes work to address the issues highlighted in this report. Their function should include managing stock condition surveys, harnessing the Council’s data and ‘intelligence’ (including information from the contractor) to understand stock performance and ensuring all investment decisions represent good value for money.”

<b>No.</b>	<b>Action</b>	<b>Timescale</b>	<b>ARK recommendation addressed (key above)</b>	<b>Accountability</b>
11	<p><b>Establish a team focussed on improving investment planning</b> for council housing stock, its functions to include:</p> <ul style="list-style-type: none"> <li>managing stock condition surveys,</li> <li>harnessing data and intelligence (including information from the contractor) to understand stock performance, and</li> <li>ensuring all investment decisions represent value for money.</li> </ul>	Staffing and Resourcing plan complete by end of May 2021	IA B	Interim ED Housing

No.	Action	Timescale	ARK recommendation addressed (key above)	Accountability
12	Develop a robust short-term investment programme that includes work to address the issues highlighted in ARK's report.		IA B	Dir H&SI
	<b>Problems causing damp and mould treated as 'one-off' repairs; Root causes of damp, mould &amp; condensation at 1-87 Regina Rd</b>		IIR – ii IIR – x	
13	Assess, plan and coordinate resolution of root causes of problems at 1-87 Regina Road.		IIR – ii & IIR - x	
14	Bring forward the replacement of the roof of 1-87 Regina Road and consider the installation of a mechanical ventilation system.		IIR – ii & IIR - x	
15	<b>Proactive survey of all tower blocks</b> Precautionary checks will be conducted at all 26 council-owned high-rise blocks	Starting in May 2021	IIR – xii	Dir H&SI
16	Proactively survey all 26 council-owned tower blocks and develop clear investment plans for their future. <ul style="list-style-type: none"> <li>• Undertake detailed surveys at an initial five blocks including three in Regina Road, which will inform future investment priorities in those homes.</li> <li>• Plan further follow-on inspections and surveys across the council's housing schemes in accordance with a proactive approach to future planned stock investment programmes.</li> </ul>	Starting in May 2021	IIR – xii	

### ARK Immediate Action C: Strategic Group

Establish 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. As a minimum provide opportunities for tenants to be involved in the development of plans and scrutiny of outcomes.

### Recommendation 1: *Governance and strategic leadership:*

"Establish clear governance arrangements to provide strategic leadership to the service. This strategic group should direct future strategy around a common vision for the service. Their role should include ensuring robust performance management and decision-making, agreeing policy and practice (including service standards) and ensuring there is a 'joined-up' approach across all Council services."

No.	Action	Timescale	Recommendation addressed	Accountability
17	<p>Create the post of Interim Executive Director of Housing, who will bring together the council's housing functions and improvement work into one place. The role will:</p> <ul style="list-style-type: none"> <li>• establish clear governance arrangements to provide strategic leadership to the housing service,</li> <li>• lead the wider review of the service and bring together housing roles, currently fragmented across the organisation, into a coherent whole,</li> <li>• lead in the development of a common vision and an improvement plan for the service,</li> <li>• ensure robust performance management and decision-making,</li> <li>• agree policy and practice (including service standards), and</li> <li>• ensure there is a 'joined-up' approach across <u>all</u> council services.</li> </ul>	From May 2021	IA 3 & R1	Chief Executive/ Interim ED Housing
18	Establish clear governance arrangements to provide strategic leadership to the service.		R1	

<b>No.</b>	<b>Action</b>	<b>Timescale</b>	<b>Recommendation addressed</b>	<b>Accountability</b>
19	<p>Establish a Housing Improvement Board, a strategic group with the power to:</p> <ul style="list-style-type: none"> <li>oversee the development and implementation of an improvement plan and</li> <li>direct the initial work of the investment planning and control teams</li> </ul> <p>Seek the advice of housing professionals and engage with tenants and leaseholders to test the approach to establishing the Board and deciding on its membership.</p>	From May 2021	IA C	Interim ED Place/ Interim ED Housing
20	Involve tenants in the development of plans and scrutiny of outcomes through their membership of the Housing Improvement Board. Tenants of Regina Road have been asked verbally to be involved.	Now	IA C	
21	<p>Conduct a longer-term and wider-reaching review and improvement programme for the council's housing services:</p> <ul style="list-style-type: none"> <li>Involve residents in the process and keep them informed</li> <li>consider in particular how the council listens to its tenants, both in terms of responding to issues raised and in designing services</li> <li>consider delivery of the repairs service, in order to identify the most cost effective means of providing the service that also meets the standards expected by tenants.</li> </ul>			Interim ED Housing
22	<p>Develop a common vision and a longer-term Improvement Plan for the housing service, to:</p> <ul style="list-style-type: none"> <li>address further the recommendations for improvement in the report of the independent investigation:</li> <li>respond to the findings of the wider-reaching review</li> <li>address other issues in the housing service, including: <ul style="list-style-type: none"> <li>the quality and cost of emergency and temporary accommodation the council secures for homeless households,</li> <li>the impact of living in emergency and temporary accommodation on families with children and on the number of children who come to be looked after by the council.</li> </ul> </li> </ul>		R 1-7	<p>Interim ED Housing</p> <p>Overseen by Housing Improvement Board</p>

**Recommendation 2: Workforce plan:**

“Undertake a forward-looking skills gap analysis. Develop a workforce plan to recruit, train and develop staff (including mentoring and involvement good practice networks) to fill any gaps.”

<b>No.</b>	<b>Action</b>	<b>Timescale</b>	<b>Recommendation addressed</b>	<b>Accountability</b>
23	Undertake a forward-looking skills gap analysis.	To start immediately	R2	Interim EDs and Directors
24	Update the council’s workforce plan to recruit, train and develop staff (including mentoring and involvement good practice networks) to fill any skills gaps		R2	

**Recommendation 3: Staff development programme:**

“Implement a development programme to ensure all staff consistently demonstrate the attitudinal and behavioural competences needed to support the Council’s values and help shape its culture. This should include steps to ensure the Council (and contractors) consistently deliver a tenant-focussed service and has a ‘safety first’ culture.”

<b>No.</b>	<b>Action</b>	<b>Timescale</b>	<b>Recommendation addressed</b>	<b>Accountability</b>
	<b>Outmoded culture and attitude among a number of staff towards tenants:</b>		IIR – iii	
25	Directors, heads of service and managers have been specifically directed to challenge all instances of outmoded attitudes, disrespect and lack of empathy for tenants.		IIR – iii	Directors
26	Incorporate action to treat tenants with respect and empathy in council’s cultural transformation programme and ensure staff are aware of the Council’s Code of Conduct, Commitment to Equality and Equality in Employment Policy and complete Equality and Diversity ELearning.		IIR – iii	Dir HR

<b>No.</b>	<b>Action</b>	<b>Timescale</b>	<b>Recommendation addressed</b>	<b>Accountability</b>
27	Include a module in the council's cultural transformation programme on ensuring the council consistently deliver a tenant-focussed service and has a 'safety first' culture		R3	Dir HR
28	Work in partnership with the council's contractors to ensure that contractor operatives consistently deliver a tenant-focussed service and have a culture of 'safety first', respect and empathy for tenants		R3 & IIR - iii	

#### **Recommendation 4: *Tenant involvement***

"Strengthen the council's capacity, competence and commitment to tenant involvement through training and developing of staff (and councillors), and reviewing existing structures to ensure they are 'fit-for-purpose' and ensure tenants have their voices heard."

<b>No.</b>	<b>Action</b>	<b>Timescale</b>	<b>Recommendation addressed</b>	<b>Accountability</b>
29	The council is in the process of helping Regina Road residents to set up a residents group	Immediate	IIR - vii	Dir H&SI
30	Develop a training programme to strengthen the capacity and competence of staff to ensure meaningful resident involvement		R4	Interim ED Housing
31	Include a commitment to tenant and leaseholder involvement in the council's wider culture transformation programme		R4	Dir HR/ Interim ED Housing
32	Reviewing existing resident participation structures, having regard to good practice in other local authorities and registered providers and the views of Croydon council tenants, to ensure they are 'fit-for-purpose' and ensure tenants have their voices heard		R4	
33	Deliver a briefing to councillors on regulatory frameworks and housing policy how to respond to tenant queries most effectively and seek a response at higher level when appropriate.		R4	

**Recommendation 5: Business intelligence**

“Develop ‘business intelligence’ systems that allow the Council to collect and share real-time information on asset condition and performance (including from the contractor). This should enable the Council to proactively identify and learn from problems, manage disrepair claims more effectively and drive better investment decisions.”

No.	Action	Timescale	Recommendation addressed	Accountability
	<b>Use of data and intelligence</b>		IIR – ix	
34	Complete the recruitment of two principal asset management analysts, one through filling a vacant post, the other by means of a secondment		IIR – ix	
35	Draw intelligence and data together to give a holistic view of asset performance and inform strategic decision making or budget setting; Take account of high levels of responsive repairs in order to make proactive investment decisions.		IIR – ix	
36	<b>Accuracy of data on stock condition and health and safety:</b> Audit the accuracy of all key data on stock condition (ref. Decent Homes Standard) and landlord health and safety responsibilities (stock condition surveys will start to address this)		IIR – xi	
37	Develop ‘business intelligence’ systems that allow the council to collect and share real-time information on asset condition and performance (including from the contractor).		R 5	

**Recommendation 6: Performance management:**

“Conduct a fundamental review of existing performance management arrangements. Develop a comprehensive performance management ‘suite’ with bespoke reporting relevant to the ‘audience’ (for example, councillors, senior managers, operational manager and, tenants scrutiny groups). All indicators should be outcome-focussed and underpinned by robust assurance ‘arrangements’ covering data quality and outcomes delivered.”

<b>No.</b>	<b>Action</b>	<b>Timescale</b>	<b>Recommendation addressed</b>	<b>Accountability</b>
38	Conduct a fundamental review of existing performance management arrangements.		<b>R 6</b>	
39	Develop a comprehensive performance management ‘suite’ of reports as part of the council’s wider system of internal control and framework of reporting on and accountability for finance, risk, performance, workforce, health and safety and equalities		<b>R 6</b>	
40	Define outcome-focussed performance indicators, underpinned by robust assurance ‘arrangements’ covering data quality and outcomes delivered		<b>R 6</b>	

**Recommendation 7: Complaints**

“Make improvements to complaints handling in line with the Housing Ombudsman’s Complaint Handling Code and publicise how the Council is using complaints to drive service improvements.”

<b>No.</b>	<b>Action</b>	<b>Timescale</b>	<b>Recommendation addressed</b>	<b>Accountability</b>
41	<p><b>Tenant lack of awareness of how to report issues:</b> Council staff were present at Regina Road for two weeks to give residents an opportunity to identify any other issues that needed addressing. A letter to all residents in the block on 29 March gave details of how to contact their tenancy officer. In addition, the council wrote to the tenants of all 16 council-owned blocks of flats of similar design with details of how to contact the tenancy service.</p> <p>Inform all other council tenants how to report failures in the day-to-day repairs service and non-repair issues. Inform each council tenant of identity and contact details of their tenancy officer.</p>		IIR – vii	
42	<p><b>Route for resolving concerns and complaints:</b> Make improvements to the reporting of complaints from tenants, leaseholders, councillors and MPs, and the handling of those complaints in line with the Housing Ombudsman’s Complaint Handling Code so as to achieve a simple, effective, clear and accessible route for getting concerns and complaints resolved with clear timescales and accountability.</p>		IIR – vi R 7	
43	Publicise the new improved system to all tenants.			
44	Publicise how the Council is using complaints to drive service improvements		R 7	