

# Public Document Pack

## MID DEVON DISTRICT COUNCIL

**MINUTES** of a **MEETING** of the **HOMES POLICY DEVELOPMENT GROUP** held on 15 October 2018 at 1.45 pm

### **Present**

**Councillors:** W J Daw (Chairman)  
Mrs E M Andrews, Mrs H Bainbridge,  
D R Coren, Mrs G Doe, R J Dolley,  
F W Letch and J D Squire

### **Apologies**

**Councillor** P J Heal

### **Also Present**

**Councillor** R L Stanley

### **Also Present**

**Officers** Andrew Pritchard (Director of Operations), Claire Fry (Group Manager for Housing), Mark Baglow (Group Manager for Building Services), Catherine Yandle (Group Manager for Performance, Governance and Data Security) and Sarah Lees (Member Services Officer)

## 34 **APOLOGIES AND SUBSTITUTE MEMBERS**

Apologies were received from Councillor P J Heal.

## 35 **DECLARATION OF INTERESTS UNDER THE CODE OF CONDUCT**

No interests were declared under this item.

## 36 **PUBLIC QUESTION TIME**

There were no members of the public present.

## 37 **MINUTES**

The minutes of the meeting held on 11 September 2018 were confirmed as a true and accurate record and **SIGNED** by the Chairman.

A brief discussion took place regarding the policy in relation to the parking of mobility scooters in communal areas being forbidden as per the current Mid Devon District Council approved policy. It was suggested that consideration be given in the future to providing a covered shelter (with electric) for these vehicles although it was recognised that currently there was not money available within the budget to do this. It was explained that where somebody had been assessed by an Occupational Therapist as having a need for a mobility scooter the Council did make the necessary adjustments to that persons home to allow for a scooter, for example, by installing ramps, widening doors or providing mobility aids.

It was further suggested that planners and developers should give more consideration to incorporating a sheltered area or storage space for scooters in the design of facilities aimed at the older population.

### 38 CHAIRMAN'S ANNOUNCEMENTS

The Chairman had no announcements to make.

### 39 A NEW DEAL FOR SOCIAL HOUSING - CONSULTATION RESPONSE TO THE GREEN PAPER (00:21:00)

The Group had before it a copy of the Government's Green Paper \* entitled 'A new deal for social housing'. Within the document there were a number of questions that interested parties were encouraged to think about and provide a response to as part of a national consultation.

In an effort to aid discussion, the Group Manager for Housing had provided some suggested responses to each of the questions (see Appendix A). The Group discussed each of these in depth and provided the following comments and where necessary, amendment, to the suggested response:

1. *How can residents best be supported in this important role of working with landlords to ensure homes are safe?*

Suggested response was agreed. The Group noted that it is the view of this Council that when a housing authority has stock that is maintained to a good standard and offers a high standard of service delivery, it is less likely that tenants will come forward to get involved although the Council worked hard to encourage them to do so.

2. *Should new safety measures in the private rented sector also apply to social housing?*

The word 'Yes' to be added to the start of the suggested response as the Group felt it should be equitable on both sides.

3. *Are there any changes to what constitutes a Decent Home that we should consider?*

In addition the Group suggested that the definition of a "decent Home" should implicitly include consideration of any adaptations needed as a result of an aging population; this may include, for example, the provision of storage facilities for mobility scooters.

4. *Do we need additional measures to make sure social homes are safe and decent?*

Agreed suggested response. The Group considered that the Council was doing all it could to provide a comprehensive adaptations service.

5. *Are there ways of strengthening the mediation opportunities available for landlords and residents to resolve disputes locally?*

Agreed suggested response. The Council was currently doing all it could to resolve disputes locally and the Group were satisfied that a robust system was in place.

6. *Should we reduce the eight week waiting period to four weeks, or should we resolve the requirement for the “democratic filter” stage altogether?*

Agreed suggested response to reduce to four weeks.

7. *What can we do to ensure that the “designated persons” are better able to promote local resolutions?*

Suggested response agreed as written.

8. *How can we ensure that residents understand how best to escalate a complaint and seek redress?*

Suggested response agreed as written.

9. *How can we ensure that residents can access the right advice and support when making a complaint?*

Suggested response agreed as written.

10. *How can we best ensure that landlords’ processes for dealing with complaints are fast and effective?*

Suggested response agreed as written.

11. *How can we best ensure safety concerns are handled swiftly and effecting within the existing redress framework?*

Suggested response agreed as written.

12. *Do the proposed key performance indicators cover the right areas? Are there any other areas that should be covered?*

Suggested response agreed as written.

*13. Should landlords report performance against these key performance indicators every year*

Suggested response agreed as written.

*14. Should landlords report performance against these key performance indicators to the Regulator?*

Suggested response agreed as written.

*15. What more can be done to encourage landlords to be more transparent with their residents?*

*Suggested response agreed with the addition of ‘...and carefully listens to its tenants...’ At the end of the first sentence.*

*16. Do you think that there should be a better way of reporting the outcomes of landlords’ complaint handling? How can this be made as clear and accessible as possible for residents?*

Suggested response agreed as written.

*17. Is the Regulator best placed to prepare key performance indicators in consultation with residents and landlords?*

Suggested response agreed as written but with suggestion that all Registered Providers should subscribe to Housemark as the benchmarking service which they provide represents the industry standard.

*18. What would be the best approach to publishing key performance indicators that would allow residents to make the most effective comparison of performance?*

Suggested response agreed as written.

*19. Should we introduce a new criterion to the Affordable Homes Programme that reflects residents’ experience of their landlord? What other ways could we incentivise best practice and deter the worst, including for those providers that do not use Government funding to build?*

Suggested response agreed as written.

*20. Are current resident engagement and scrutiny measures effective? What more can be done to make residents aware of existing ways to engage with landlords and influence how services are delivered?*

Suggested response agreed as written.

*21. Is there a need for a stronger representation for residents at a national level? If so, how should this best be achieved?*

Suggested response agreed as written.

*22. Would there be interest in a programme to promote the transfer of local authority housing, particularly to community-based housing associations? What would it need to make it work?*

Suggested response agreed as written but with the inclusion of the word 'No' at the start of the first sentence.

*23. Could a programme of trailblazers help to develop and promote options for greater resident-leadership within the sector?*

Suggested response agreed as written but with the inclusion of the word 'No' at the start of the first sentence.

*24. Are Tenant Management Organisations delivering positive outcomes for residents and landlords? Are current processes for setting up and disbanding Tenant Management Organisations suitable? Do they achieve the right balance between resident's control and local accountability?*

Suggested response agreed as written.

*25. Are there any other innovative ways of giving social housing residents greater choice and control over the services they receive from landlords?*

Suggested response agreed as written.

*26. Do you think that there are benefits to models that support residents to take on some of their own services? If so, what is needed to make this work?*

Suggested response agreed as written but with the inclusion of the word 'No' at the start of the first sentence.

*27. How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and value for money?*

Suggested response agreed as written.

*28. What more could we do to help leaseholders of a social housing landlord?*

Suggested response agreed as written.

29. *Does the Regulator have the right objective on consumer regulation? Should any of the consumer standards change to ensure that landlords provide a better service for residents in line with the new key performance indicators proposed, and if so how?*

Suggested response agreed as written.

30. *Should the Regulator be given powers to produce other documents, such as a Code of Practice, to provide further clarity about what is expected from the consumer standards?*

Suggested response agreed as written.

31. *Is “serious detriment” the appropriate threshold for intervention by the Regulator for a breach of consumer standards? If not, what would be an appropriate threshold for intervention?*

Suggested response agreed as written.

32. *Should the Regulator adopt a more proactive approach to regulation of consumer standards? Should the Regulator use key performance indicators and phased interventions as a means to identify and tackle poor performance against these consumer standards? How should this be targeted?*

Suggested response agreed as written.

33. *Should the Regulator have greater ability to scrutinise the performance and arrangements of local authority landlords? If so, what measures would be appropriate?*

Suggested response agreed as written.

34. *Are the existing enforcement measures set out in Box 3 adequate? If not, what additional enforcement powers should be considered?*

Suggested response agreed as written.

35. *Is the current framework for local authorities to hold management organisations such as Tenant Management Organisations and “Arms Length Management” Organisations to account sufficiently robust? If not, what more is needed to provide effective oversight of these organisations?*

Suggested response agreed as written.

*36. What further steps, if any, should Government take to make the Regulator more accountable to Parliament?*

Suggested response agreed as written.

*37. How could we support or deliver a best neighbourhood competition*

Suggested response agreed as written.

*38. In addition to sharing positive stories of social housing residents and their neighbourhoods, what more could be done to tackle stigma?*

Suggested response agreed as written subject to the correction of two typo's and the addition of a comment that 'stigma' in this context is not so much of an issue in Mid Devon; there are many people living in private sector housing who are keen to move into social housing on the basis that homes in the management of the Council and other RP's are in good repair and on the grounds of affordability. This is evidenced by the large number of housing applicants who have been placed in Band E on Devon Home Choice. Band E is the band of "no housing need". We believe that the issue of "stigma" is one of public perception but the Council's believes that there is a positive view of social housing generally in our District. Nearly half of our own retained stock has been sold so the majority of our estates are now mixed tenure.

*39. What is needed to further encourage the professionalisation of housing management to ensure all staff deliver a good quality of service?*

Suggested response agreed as written with the addition of the following:

This Council would suggest that Housing Associations should be subject to the same degree of rigour in terms of training responsibilities as local authorities.

We would also suggest that consideration needs to be given to ensuring that there is a clear line of responsibility within housing associations with regard to health and safety matters. In local authorities, the Chief Executive has clear responsibility for these and we believe that putting in place arrangements to ensure that responsibility rested with one paid Officer would deliver greater accountability.

*40. What key performance indicator should be used to measure whether landlords are providing good neighbourhood management?*

Suggested response agreed as written.

*41. What evidence is there of the impact of the important role that many landlords are playing beyond their key responsibilities? Should landlords report on the social value they deliver?*

Suggested response agreed as written with the additional comment that the Council would query how you could define social value.

*42. How are landlords working with local partners to tackle anti-social behaviour? What key performance indicator could be used to measure this work?*

Suggested response agreed as written.

*43. What other ways can planning guidance support good design in the social sector?*

Suggested response agreed as written with the addition of the following:

The Council believes that it is important to deliver “homes for life” which meet the needs of households as their circumstances change and design principles need to incorporate this. It also supports the use of pepper potting to ensure that no differentiation can be made between the social housing and the private housing on new estates.

*44. How can we encourage social housing residents to be involved in the planning and design of new developments?*

Suggested response agreed as written.

*45. Recognising the need for fiscal responsibility, this Green Paper seeks views on whether the Government’s current arrangements strike the right balance between providing grant funding for housing associations and Housing Revenue Account borrowing for local authorities.*

Suggested response agreed as written.

*46. How can we boost community-led housing and overcome the barriers communities experience to developing new community owned homes?*

Suggested response agreed as written with the additional comment as follows:

This Council would suggest that a review of the funding mechanism to support the development of Community Land Trusts would help. The monies received in this area related to the number of second homes in Mid Devon and there is therefore only a limited pot. We would add that, in our view, most local authorities do not have the resources to deliver a wholesale transfer of housing stock.



*47. What level of additional affordable housing, over existing investment plans, could be delivered by social housing providers if they were given longer term certainty over funding?*

Suggested response agreed as written.

*48. How can we best support providers to develop new Shared Ownership products that enable people to build up more equity in their homes?*

Suggested response agreed as written.

The Group wished for their comments and amendments to be incorporated into the final suggested response to the consultation and that, with approval from the Cabinet Member for Housing, these go forward as the official response from the Council to the Ministry of Housing, Communities & Local Government by the deadline date of 6 November 2018.

The Group passed on their thanks to the Group Manager for Housing for her hard work in relation to this matter thus far.

Note: (i) \* Green paper circulated; copy attached to the signed minutes.

(ii) Suggested responses attached as Appendix A.

### **Draft suggested responses to the Green Paper**

(The meeting ended at 4.02 pm)

**CHAIRMAN**

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# Minute Annex

## **A New Deal for Social Housing published August 2018 by the Ministry of Housing, Communities and Local Government**

The Government's Green Paper: "A new deal for social housing" was informed by meetings residents of social housing and views and suggestions made online by others. It sets out a number of proposals and is seeking feedback on various issues. Organisations such as the Council are expected to respond via the online survey available at [https://www.surveymonkey.co.uk/r/A\\_new\\_deal\\_for\\_social\\_housing](https://www.surveymonkey.co.uk/r/A_new_deal_for_social_housing)

In the interests of clarity, each of the questions contained within the Green Paper is listed below in order with a draft response, for discussion, following.

1. How can residents best be supported in this important role of working with landlords to ensure homes are safe?

MDDC has a menu of involvement which gives tenants and leaseholders opportunities to be involved in many different ways. We have a vibrant tenant scrutiny group which undertakes service reviews and involved tenants also have opportunities to comment on Council housing-related policies, performance etc. We provide training, as required, and have a budget set aside to enable residents to attend events where they can network. Councillors listen to the views of tenants. Involved tenants attend our Housing Performance and Improvement Board meetings. The Housing Service consults tenants on matters relating to safety; recently, we reviewed our policy relating to gas safety and tenants were given an opportunity to comment on it before it went through the Council's democratic process. Other relevant policies have also been discussed by our tenant scrutiny group as part of the review process; these include our Fire Risk in Communal Areas policy and our Neighbourhood Management policy.

Tenants, together with other stakeholders including local Ward Members, and the Police, are invited to attend Neighbourhood Walkabouts and these estate inspections should prompt discussions about any safety related issues, condition of the estate etc.

When letting our homes, we invite tenants to a sign up meeting where we show a video which sets out their rights and responsibilities. This video is held on the YouTube platform and there is a link to it on our webpages so that tenants can access it for reference.

We check communal areas in blocks of flats on a monthly basis and provide a roving caretaker service to maintain the estate. We also invite tenants and other stakeholders to participate in Neighbourhood Walkabouts, this is our name for estate inspections. We also operate a zero tolerance policy on the storage of belongings in communal areas.

It is the view of this Council that this approach supports tenants who wish to work with us as a landlord to ensure that homes are safe.

2. Should new safety measures in the private rented sector also apply to social housing?

Parity would ensure that no one group of tenants was treated any more or less favourably than any other.

3. Are there any changes to what constitutes a Decent Home that we should consider?

MDDC has identified a need to continue to invest in green energy initiatives in order to reduce fuel poverty amongst our tenants. As Mid Devon is located in a largely rural area, this is a key issue because so many of our properties, 779 (as at the end of September 2018), are “off grid”. In the current climate, where fuel costs are increasing, we recognise that this is a key area of concern for tenants. A significant proportion of our homes (1142), that is over 1/3 of the total in our management, have solar panels due to the fact that we work in partnership with Anesco. The average size is 2.5kWp. The benefit from the income received from the feed-in tariff arrangements is reinvested to support our work relating to green energy initiatives which are offered to those other tenants not having the benefit of a reduction in their fuel costs.

The work required by a strengthened Decent Home Standard might not be affordable for some local authorities with retained stock especially those with aging properties.

4. Do we need additional measures to make sure social homes are safe and decent?

Tenants are able to report repairs and these are dealt with in accordance with policy and procedure. The priority given to each job is clearly stated and depends upon the seriousness of the issue. We use an integrated housing management system which gives us a comprehensive record relating to each property and this has an interface with our electronic asset management system.

This Council has a policy which supports tenancy audits; we call these “Tenancy Home Checks”. These involve Neighbourhood Officers visiting every property periodically. These visits give tenants an opportunity to tell us about any outstanding repairs and the visual inspection of the property allows the identification of any obvious safety issues.

We also have programmes of planned maintenance which include annual gas safety inspections, regular electric checks and checks relating to chimney flues.

We are certain that our homes are safe and decent and that all responsible social landlords should have such an approach.

5. Are there ways of strengthening the mediation opportunities available for landlords and residents to resolve disputes locally?

This Council supports a local community based mediation service, Devon Mediation. This service has a number of volunteers who are highly trained and who assist us with disputes where family breakdown is a factor and those involving neighbours.

Such local services could be utilised in some cases to encourage greater discussion between landlords and tenants who are in dispute. Such an approach has the potential to encourage greater understanding with the aim of local resolution in mind.

However, if the Housing Ombudsman Scheme was amended to include a requirement that mediation was at least considered prior to cases being referred to them, then local mediation services may require additional funding to enable them to respond to the increase in workload.

6. Should we reduce the eight week waiting period to four weeks, or should we resolve the requirement for the “democratic filter” stage altogether?

This Council appreciates that Councillors are well placed to help tenants to achieve local resolution of disputes with the Housing Service. However, our experience is that most tenants will involve their local Ward Member at an early stage if they have a complaint and if they remain dissatisfied. Our standard letter template states: "To contact your local Councillor, his/her name and address can be obtained by visiting our website or telephoning Customer First on 01884 255255"

We believe that the "democratic filter" should remain but that the waiting period should be reduced to four weeks so that those tenants who wish to escalate their complaint directly to the Housing Ombudsman Service can do so more quickly than at present.

7. What can we do to ensure that the "designated persons" are better able to promote local resolutions?

Registered providers of social housing (RPs) should be required to promote the role that Councillors, in particular, can play to resolve complaints. Local ward members are often able to take a more balanced view and may be able to suggest options as a way forward which neither side has previously considered or are aware of. Whilst those Councils with retained stock will work with Councillors as a matter of routine, we feel that other registered providers might benefit from promoting them as "designated persons" more than they do at present.

8. How can we ensure that residents understand how best to escalate a complaint and seek redress?

This could be achieved by requiring RPs to publish information relating to this. This Council has information about our approach to feedback, compliments and complaints on our webpages and there is a leaflet available for those tenants who do not have access to the internet. We publish feedback on lessons learnt from complaints in our periodic newsletter. Our tenant handbook, given to all new tenants, and our standard tenancy agreements all reference our policy relating to feedback, compliments and complaints. As noted, we include information about how to contact local Councillors in all the strapline on the template for all correspondence. We believe that all registered providers should be required to publicise relevant information in the same way.

9. How can we ensure that residents can access the right advice and support when making a complaint?

This could be achieved by signposting residents to local advice agencies and to local Councillors.

Requiring RPs to publish information about this might also help. In Mid Devon, there is a local housing advice service, CHAT (Churches Housing Action Team) and we receive complaints made via this organisation.

10. How can we best ensure that landlords' processes for dealing with complaints are fast and effective?

Our Housing Service must adhere to the corporate complaint procedure and in accordance with this there are service standards. These are monitored and the results are reported to the Council. Requiring RPs to implement prescribed service standards and/ or targets for resolution could ensure

that the complaints are dealt with fast. This Council has a two stage process where a service manager responds to the first complaint. If the complainant remains dissatisfied after this, the response is reviewed by a more senior manager. The complaint is then closed. We provide information regarding the Housing Ombudsman Service to all complainants so that they are aware that they may escalate the complaint if they feel that their complaint has not been resolved.

After each stage, the investigating Officer completes a standard template which identifies lessons learnt and any necessary changes to policy and / or procedure. We report on the outcome of complaints to our Housing Performance and Improvement Board which is comprised of the Cabinet Member for Housing, senior managers and tenant reps.

Making such an exercise an intrinsic part of the process and ensuring that this is available to the Housing Ombudsman Service if complaints are escalated has the potential to make RPs more effective at resolving complaints locally.

11. How can we best ensure safety concerns are handled swiftly and effectively within the existing redress framework?

This could be achieved by giving tenants a well publicised “whistle-blowing” procedure for escalating any concerns regarding safety quickly to the Regulator for Social Housing (RSH) or to the Housing Ombudsman Service.

The Housing Ombudsman Service currently has a backlog and this can be difficult because both tenants and landlords are kept waiting for responses. It may be worth considering resourcing issues relating to this service with a view to ensuring that the existing structure is fit for purpose and that there are enough Officers available to undertake case work.

12. Do the proposed key performance indicators cover the right areas? Are there any other areas that should be covered?

In local authorities with retained stock, all housing management and maintenance is funded by rent paid by tenants. Therefore, this Council believes that data relating to performance in relation to rent collection is important to tenants. We would like to see this included in any suite of key performance indicators.

Local authority expenditure is tightly monitored but there is a perception that housing associations have more funds and that expenditure is not as tightly controlled. Tenants may like to compare expenditure on certain items and this, in turn, might encourage housing associations to be less profligate with regard to expenditure. For example, a housing association group in the South West has undergone a re-branding exercise which was very costly. This was necessary as a result of a legal challenge from another organisation using a similar name in Canada.

13. Should landlords report performance against these key performance indicators every year?

Tenants will lose faith in the process if the data available is out of date and, for that reason, this Council would argue that they should. Most RPs are members of HouseMark and produce statistical data to inform a benchmarking exercise so we do not believe that such an exercise would be unduly onerous as long as the information requested and the format was similar.

14. Should landlords report performance against these key performance indicators to the Regulator?

This Council views this as beneficial as long as there was a mechanism to check the data in some cases. Auditing a random sample of 10% of RPs on an ongoing basis would deliver clarity and transparency, especially if there was a set methodology which must be adhered to. Alternatively, we suggest that RPs are required to submit this data to external auditors.

15. What more can be done to encourage landlords to be more transparent with their residents?

This Council is committed to being transparent in all matters relating to housing management and to meeting the requirements of the Tenant Involvement and Empowerment Standard. The Housing Service currently publishes information on performance on our webpages and also shares more detailed information with our involved tenants who partake in scrutiny activities.

There is a fear that other RPs are not so concerned about this because currently failure to deliver the required outcomes and specific expectations set out in the Standard is not associated with any specific penalties. In our view, the Standard is prescriptive enough to deliver what is required. The RSH could undertake reviews to ensure that all RPs are adhering to it and could publish their findings in cases where there was non-compliance.

16. Do you think that there should be a better way of reporting the outcomes of landlords' complaint handling? How can this be made as clear and accessible as possible for residents?

Our Housing Service currently reports on the outcome of complaints to our Scrutiny Group, Tenants Together, and to our Housing Performance and Improvement Board. The data is anonymised. RPs could be required by the RSH to publish such data. We believe that this might deliver the right outcomes but there has to be an understanding that the process can only be meaningful if the investigating Officers are open and transparent and committed to using complaints in a positive way to inform service development.

17. Is the Regulator best placed to prepare key performance indicators in consultation with residents and landlords?

This Council feels that the RSH could prepare key performance indicators provided it has the resources needed to enable them to do this. Effective consultation with tenants needs time and Officers with the appropriate skills to enable them to communicate well with people who may not ever have been required to comment on such matters before.

18. What would be the best approach to publishing key performance indicators that would allow residents to make the most effective comparison of performance?

RPs could be required to publish them in a variety of formats so that their own tenants could access them. Alternatively, the RSH could publish this information on their website and also make data available to those tenants without internet access. This Council believes that the use of infographics would be a good idea as some tenants will not be used to looking at spreadsheets. The data needs to be displayed in such a way as to ensure that it is easy to understand and that comparisons can be easily made.

19. Should we introduce a new criterion to the Affordable Homes Programme that reflects residents' experience of their landlord? What other ways could we incentivise best practice and deter the worst, including for those providers that do not use Government funding to build?

Unfortunately, a resident's experience of their landlord could be quite subjective. It might depend upon their own personal experience. Therefore, for example, if they owed rent and the landlord had commenced possession proceedings in order to safeguard its own interests, that tenant could have a negative view of the service.

Promoting good practice amongst RPs and publishing information about failures is, in our view, the best way of incentivising good practice. We are committed to setting targets relating to key areas of performance, publishing those and then monitoring against them. We do not agree that the addition of a new criterion to the Affordable Homes Programme which reflects satisfaction levels is necessarily the best way to deliver the required outcomes.

20. Are current resident engagement and scrutiny measures effective? What more can be done to make residents aware of existing ways to engage with landlords and influence how services are delivered?

Getting tenants to become more involved is always going to be problematic, especially if there is no widespread dissatisfaction regarding the offer. Mid Devon is located in a beautiful part of the world, the homes in our management are generally regarded as being of good quality and in good repair and incidences of anti-social behaviour are low.

Tenants want excellent performance provided by a landlord which delivers value for money. However, if the landlord is performing like this, it can generate apathy due to the fact that tenants are comfortable with services and the way in which they are delivered.

Our involved tenants are those who are engaging with us out of a genuine desire to work with us to deliver service improvement. They are not generally involved because they have issues to raise. We believe that our resident engagement and scrutiny arrangements are robust and fit for purpose.

We do use satisfaction data received in connection with several areas of work to inform service improvement but we find that obtaining feedback in relation to our handling of anti-social behaviour complaints, for example, can be difficult as the outcome of the case may impact upon the willingness of the complainant to advise us about their experience.

However, we accept that other RPs may not be so willing to engage with tenants and, for this reason, we believe that measuring some aspects of tenant involvement and reporting on them to the RSH may be beneficial as a tool to drive up standards. We already keep statistics relating to some aspects of tenant involvement, for example, the number of tenants and other stakeholders who attend our periodic Neighbourhood Walkabouts.

21. Is there a need for a stronger representation for residents at a national level? If so, how should this best be achieved?

We are members of TPAS which we believe does a good job with regard to representing the views of our tenants at a national level. The Council feels that the creation of any new group could syphon



funding away from other initiatives such as the need to provide more funding to some RPs to enable them to improve the safety of the homes in their management or to support community led mediation initiatives, for example.

22. Would there be interest in a programme to promote the transfer of local authority housing, particularly to community-based housing associations? What would it need to make it work?

Our tenants voted against a voluntary transfer to a housing association approximately 12 years ago. This Council feels that existing arrangements can deliver the best outcomes for our tenants given our commitment to co-regulation and the work done by both Councillors and tenants to ensure that our services are accessible, efficient and effective.

We believe that high quality service delivery has the potential to generate apathy amongst tenants and that there is no appetite for this type of initiative in Mid Devon due to the high levels of performance and the quality of service delivery.

The approach being suggested would require a pool of involved tenants who had the right knowledge and skills needed to participate in the running of the organisation in a meaningful way. In the past, the Housing Service has invested in providing relevant training to tenant reps and then, because there is no contract compelling them to stay in their voluntary roles, they have given up their involvement, for a variety of reasons. This has had the result that the investment has not delivered meaningful outcomes for the Council, although we accept that that might not be the case with regard to the personal development of those individuals involved.

This Council does not believe that there is an appetite for this type of housing organisation in our District given the commitment required from involved tenants. Furthermore, we do not believe that involved tenants would always wish to take on more responsibility especially in view of the health and safety issues which have come to the fore since the fire at Grenfell Tower.

23. Could a programme of trailblazers help to develop and promote options for greater resident-leadership within the sector?

This Council believes that it is worth exploring different models to deliver greater resident-leadership within the sector but the crucial factor here is the willingness of involved tenants to devote the time and effort needed to make such initiatives work; and whether or not they have the correct skills and knowledge to enable them to make a meaningful contribution.

There is some scepticism about whether such an approach would work in practice due to the fact that there will not be wide interest from tenants.

24. Are Tenant Management Organisations delivering positive outcomes for residents and landlords? Are current processes for setting up and disbanding Tenant Management Organisations suitable? Do they achieve the right balance between resident's control and local accountability?

The Council would not wish to comment on this given that there does not seem to be any appetite in Mid Devon for the establishment of such an organisation.

25. Are there any other innovative ways of giving social housing residents greater choice and control over the services they receive from landlords?

The Council believes that the model of tenant engagement which we operate delivers good outcomes for tenants if they wish to get involved. Local authorities with retained housing are led by Councillors who are elected and for this reason these Councillors are in touch with the views of tenants. These are reflected in policy decisions. Many housing associations, on the other hand, have Boards which are more detached from the opinions of the people housed.

26. Do you think that there are benefits to models that support residents to take on some of their own services? If so, what is needed to make this work?

The Council does not support this approach. For such models to work, there needs to be a pool of involved tenants with the requisite skills and knowledge and they need to commit to being involved for the duration of the project. This would, in reality, be difficult to achieve. Ensuring that these people had the necessary training and support would be resource intensive and would need to be funded. As previously stated, there are issues relating to the training of tenant volunteers; the provision of training to enable tenants to make a valid contribution can be costly but tenants cannot be compelled to remain involved and therefore the investment might not deliver required outcomes in the longer term.

27. How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and value for money?

This suggestion would not work in a local authority due to the procurement processes required.

28. What more could we do to help leaseholders of a social housing landlord?

This authority only has a small number of leaseholders. We have one involved leaseholder who sits on our Scrutiny Panel. Offering leaseholders opportunities to participate will ensure that their views are taken into account.

29. Does the Regulator have the right objective on consumer regulation? Should any of the consumer standards change to ensure that landlords provide a better service for residents in line with the new key performance indicators proposed, and if so how?

It is the view of this Council that what most people want is a decent home, which is well maintained, and where their landlord is able to deliver housing management services which are accessible, cost effective and responsive. For this reason, we would advocate that the RSH monitors performance relating to income collection and expenditure on management and maintenance and that certain standards are prescribed which set out what is expected of RPs in relation to these areas. These standards would include targets on income and limits on expenditure.

30. Should the Regulator be given powers to produce other documents, such as a Code of Practice, to provide further clarity about what is expected from the consumer standards?

This Council would support such an approach.

31. Is "serious detriment" the appropriate threshold for intervention by the Regulator for a breach of consumer standards? If not, what would be an appropriate threshold for intervention?

This Council would prefer to see a move away from the “serious detriment” approach whereby the RSH would only intervene if they suspected a serious breach of one of the standards which could have an impact on the health and safety of tenants. We would prefer to see a closer relationship with the RSH, one where they scrutinised all aspects of service delivery and perhaps undertook random inspections without notice. Planned inspections have the potential to tie up Officers for weeks in advance and there is the fear that some RPs would use the opportunity to buy in external assistance to ensure that they portrayed themselves in the best possible light.

32. Should the Regulator adopt a more proactive approach to regulation of consumer standards? Should the Regulator use key performance indicators and phased interventions as a means to identify and tackle poor performance against these consumer standards? How should this be targeted?

This Council would support a more proactive approach to the regulation of consumer standards. The use of key performance indicators would be useful but we would suggest that interventions were made with short-notice rather than on a phased basis to avoid the situation whereby staff are distracted from the “day job” when preparing for a forthcoming inspection. Intervention should be targeted and this should be based on poor performance as demonstrated by the key performance indicators.

33. Should the Regulator have greater ability to scrutinise the performance and arrangements of local authority landlords? If so, what measures would be appropriate?

This Council is committed to openness and transparency and therefore we support giving the RSH an ability to scrutinise our performance. We feel that it would be useful if the RSH could provide positive assistance if they identify any failings as a result of any such inspections. This could involve arranging for an organisation which is performing well in the area of concern to provide advice and support. We feel that positive intervention as opposed to the imposition of sanctions could result in better outcomes for those local authorities which may be failing. The LGA has a good framework relating to the provision of peer support and it could be that utilising this to support councils where performance is a concern, could prove beneficial especially as staff would feel more positive about any required service improvements and/ or culture change.

34. Are the existing enforcement measures set out in Box 3 adequate? If not, what additional enforcement powers should be considered?

35. It is accepted that there is a lack of consistency across the sector but Councils are subject to different levels of regulation and we believe that the existing measures are adequate. Is the current framework for local authorities to hold management organisations such as Tenant Management Organisations and “Arms Length Management” Organisations to account sufficiently robust? If not, what more is needed to provide effective oversight of these organisations?

This Council will not comment on this aspect of the consultation due to the fact that we are a stock holding authority.

36. What further steps, if any, should Government take to make the Regulator more accountable to Parliament?

This Council agrees with the proposal to make the RSH a standalone Non-Departmental Public Body. We understand that it will be accountable to Parliament in the same way as other Non-Departmental bodies.

37. How could we support or deliver a best neighbourhood competition?

TPAS runs housing awards and the Council feels that it would be appropriate for the Government to sponsor an organisation such as this which represents the interests of tenants and which also works with landlords. We believe that this represents the best approach in terms of value for money.

38. In addition to sharing positive stories of social housing residents and their neighbourhoods, what more could be done to tackle stigma?

The Council believes that the Government needs to encourage landlords to promote “good news” stories regarding tenants, their achievements and the neighbourhoods in which they live. The local news media organisations in Mid Devon is usually support of Council tenants and will publicise their complaints and other issues. This Council also finds that they are willing to promote good news stories and we therefore endeavour to issue “good news stories”, as and when appropriate.

39. What is needed to further encourage the professionalisation of housing management to ensure all staff deliver a good quality of service?

As an employer, this Council is committed to the professional and the personal development of the people who work for us. Therefore, we have implemented a supervision framework and central to this is an annual appraisal where training needs are identified. In recent years, we have supported staff to achieve academic and vocational qualifications related to housing management. We provide training opportunities for apprentices in our Housing Service and we have tried to be imaginative by offering staff the opportunity to visit other employers. To this end, staff have spent time with housing associations and also with a local solicitor.

We also pay for staff to belong to the Chartered Institute of Housing, Royal Institute of Chartered Surveyors and the Chartered Institute of Building on an individual basis; and other professional organisations such as the Housing Quality Network and Resolve in order to ensure that they are aware of good practice and are able to keep abreast of any significant changes to legislative or regulatory frameworks.

We believe that the Chartered Institute of Housing works to raise standards and that the training offered by that organisation and others such as HQN is of a good quality.

Ensuring RPs have funding available to ensure that staff have opportunities to learn and to network must be a key consideration with regard to the drive to deliver a good quality of service.

40. What key performance indicator should be used to measure whether landlords are providing good neighbourhood management?

This Council accepts that this is a good idea. However, any data arising from customer satisfaction surveys is always going to be subjective. It would give an indication but perhaps it should be supported by data relating to anti-social behaviour incidents in the neighbourhood, information

about relevant complaints and information on incidents such as slips, trips and falls. We must offer value in deliverables and clean up and maintain all areas of estates and this needs to be monitored.

41. What evidence is there of the impact of the important role that many landlords are playing beyond their key responsibilities? Should landlords report on the social value they deliver?

This Council has prioritised improving performance, delivering cost effective and efficient services and ensuring that the homes in our management are kept in good condition over recent years. In order to do this, we have concentrated more on core activities relating to housing management and maintenance and less on community development activity.

In rural Devon, the third sector plays an important role in this type of work and for this reason we cannot agree that landlords should have to report on the social value which they deliver.

If this Council is to be expected to deliver a wider range of services going forward, then funding this would be important and currently we do not have the funds available to deliver what might be required.

42. How are landlords working with local partners to tackle anti-social behaviour? What key performance indicator could be used to measure this work?

Our Housing Service works closely with the Police and many other organisations, as appropriate, to tackle anti-social behaviour. We work in partnership to support the East and Mid Devon Early Help Locality Partnership and we have close links with Social Services. In recent years, "county lines" has had a big impact upon our local area and we are working in partnership to respond to issues arising from this.

Satisfaction data relating to work around this does not always "tell the whole story"; complainants are unlikely to respond to surveys if they are dissatisfied with the outcome following the intervention of our officers. Statistics relating to numbers of incidents, partnership working and action taken may be more illuminating.

43. What other ways can planning guidance support good design in the social sector?

This Council is a developing RP but is mindful that any development activity must be viable. We are keen to develop homes which people want to live in, which are high quality and which are efficient to run. However, we feel that any changes to planning guidance need to balance the need to drive up standards with the need to ensure that development costs are not increased as a result.

44. How can we encourage social housing residents to be involved in the planning and design of new developments?

This Council would support involving tenants on an existing estate in discussions about any regeneration activity and recognise that they can also attend Planning meetings. Home design criteria has to be addressed and social homes need to be pepper potted across estates so that visitors cannot see the difference between properties.

45. Recognising the need for fiscal responsibility, this Green Paper seeks views on whether the Government's current arrangements strike the right balance between providing grant funding for housing associations and Housing Revenue Account borrowing for local authorities.

This Council is very concerned about the impact of the Right to Buy scheme on stock and on our viability going forward. We believe that the scheme must be reviewed.

46. How can we boost community-led housing and overcome the barriers communities experience to developing new community owned homes?

We have secured Government funding via the Community-led Housing Fund and are therefore able to make grants to Community Land Trusts to develop housing in their own communities. We work in partnership with Wessex Community Land Trust which engages in development work with groups of local people in rural areas. There are four Community Land Trusts in the District, two of which have developed housing. We therefore feel that the existing arrangements are working well in our area.

47. What level of additional affordable housing, over existing investment plans, could be delivered by social housing providers if they were given longer term certainty over funding?

In our area, there is a need for 750 new affordable homes over the next 10 years. Our Housing Revenue Account could not fund this. We acknowledge that the Government has now removed the borrowing cap for local authorities but any monies borrowed need to be paid back. If the Right to Buy scheme is allowed to continue, there will be issues in terms of the ability meet repayment obligations.

48. How can we best support providers to develop new Shared Ownership products that enable people to build up more equity in their homes?

There is evidence to show that there is only a very small demand for shared ownership in Mid Devon. The Council accepts that shared ownership can offer a housing solution for many people, especially in areas of high demand and high incomes, such as the South East. However, in rural areas where incomes are low, the need is minimal.