

**MINUTES** of a **MEETING** of the **HOMES POLICY DEVELOPMENT GROUP** held on 18 March 2025 at 2.15 pm

**Present**

**Councillors**

S Robinson (Chair)  
C Adcock (Vice-Chair), J Cairney, C  
Connor, A Glover and H Tuffin

**Apologies**

**Councillors**

F W Letch and N Letch

**Also Present**

**Councillor**

S J Clist

**Also Present**

**Officers**

Simon Newcombe (Head of Housing & Health), Dean Emery (Head of Revenues, Benefits & Leisure), Sophie Richards (Customer Engagement Co-Ordinator, Mid Devon Housing) and Sarah Lees (Democratic Services Officer)

**Councillors**

**Online**

J Buczkowski and J Lock

**Officers Online**

Dr Stephen Carr (Corporate Performance & Improvement Manager), Mike Lowman (Operations Manager for Building Services) and Carole Oliphant (Housing Policy Officer)

**61 APOLOGIES AND SUBSTITUTE MEMBERS**

Apologies were received from Cllrs F Letch and N Letch.

**62 PUBLIC QUESTION TIME**

The following questions were received from the one member of the public attending the meeting:

**Paul Elstone**

Question 1

My questions relate to Agenda Item 7 Housing Service Delivery Report Q3 Specifically, Paragraph 2.4

Quote: "Councillors also have a responsibility to ensure that Mid Devon Housing is being open and accountable with regard to how the organisation meets its objectives and regulatory requirements". Unquote.

I have provided Homes PDG and Scrutiny Members with a document and related "as built" drawings. Drawings that confirm and beyond doubt that the MDDC Social Housing modular build developments at both Shapland Place, Tiverton and St Andrews House, Cullompton, fail to fully comply with the UK Government's Nationally Described Space Standards. This despite what Members of this Council have been told several times previously that they did.

How can this Council justify spending extremely high and limited funds on social housing developments that are built smaller than the Government's described space standard requires and to the detriment of the residents of these dwellings?

#### Question 2

How can this Council enter into a partnership arrangement with a developer that designs then builds and installs social homes developments that fail to comply with very basic Government standards?

#### Question 3

Why are MDDC Officers including those in Housing, Planning, and of real concern Building Control, not identifying these standards failings and at various stages of the development program?

#### Question 4

How can this Council apply for and receive grant funding from a UK Government funded entity i.e. Homes England and for developments that fail to comply with the Governments own space standards?

#### Question 5

Is there not a case of Homes England being made aware of these space standard non-compliances?

#### Question 6

How can this Council, as well of the developer, routinely "trumpet" even this past week that these developments have won multiple awards given they fail to meet the most basic of standards?

#### Question 7

Is there not a case that the various entities making these awards being made aware of the standards non-compliance failings?

The Chair stated that as the questions had not been received in advance the questioner would receive written replies within 10 working days.

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

No interests were declared under this item.

## 64 MINUTES

The minutes of the meeting held on 28 January 2025 were approved as a correct record of the meeting and **SIGNED** by the Chair.

## 65 CHAIR'S ANNOUNCEMENTS

The Chair had no announcements to make.

## 66 PERFORMANCE DASHBOARD Q3 (00:07:00)

The Group were presented with, and **NOTED**, a slide \* showing performance information in the Mid Devon Housing area both under the Housing Revenue Account (HRA) and the General Fund (GF).

The dashboards aimed to give an 'at a glance' understanding of how services were performing in terms of performance measures, finance and risk. Any measures that were also part of the Corporate Plan were listed in yellow text.

The indicators were presented with current performance, the annual target and a RAG (red/amber/green) rating to indicate whether or not the Council was on track to meet its target. Overall performance was presented in a pie chart which combined the RAG ratings for both of the performance and the finance measures.

The following red and amber indicators were referred to:

- The projected outturn for the General Fund was showing as red. In part this was due to the cost of upgrades to the community alarm kit following changes in technology.
- The delivery of new social housing was showing as red and new net zero properties was also showing as red. There had been delays to live projects as well as difficulties awarding contracts for some projects which had contributed to these ratings.
- Complaints responded to within the complaints handling timescale was showing as amber, however, there had been 100% compliance in quarter three and indeed in quarter two before that, therefore performance was improving.
- Housing stock occupancy rate was shown as amber. There were a number of long term development voids awaiting redevelopment and this was continuing to lower the occupancy rate.
- HRA projected tenant income was showing as amber and this was related to the inclusion of the forecast 24/25 refunds for the overcharges arising from a historic rent calculation error.
- Projected capital outturn was showing as amber. Capital slippage of development projects was also amber. There were a number of different reasons behind some of the project delays. For example, delays around utility companies and their failure to adhere to project time scales and challenges with Devon County around road closures and their preference for these to be within school holidays. These factors had affected the Council's ability to deliver new social housing in the district. However, the pipeline of projects remained strong.

A brief discussion took place regarding:

- Whether there could be a target in relation to 'Unoccupied and unfurnished empty homes'? It was explained that several years ago the Council had employed an Empty Homes Officer as part of a discretionary service. However, this post had been removed as part of budgetary savings in this area. The imminent Tenancy Strategy would include a number of initiatives which would address some of these issues.
- 'Empty Homes' could have numerous classifications.
- The delays being experienced as a result of utility companies failing to meet desired timescales. Some new development was ready to go but needed a power supply. The reliance on Government funding was also frustrating. These were key blocking factors preventing development from moving forward at a quicker pace.
- The Group sought reassurance regarding staffing levels and were informed that Mid Devon Housing was going through a process of restructuring and more staffing resource would exist going forwards.
- It was not in the Council's interest to build unsafe developments or fail to meet the requirements of the building regulations.

Note: \* Slide previously circulated.

## 67 MID DEVON HOUSING SERVICE DELIVERY REPORT FOR Q3 2024-25 (00:25:00)

The Group had before it, and **NOTED**, a report \* from the Head of Housing & Health providing a quarterly update to Members of the Policy Development Group on activity undertaken by Mid Devon Housing (MDH) including some relating to enforcement.

The following was highlighted within the report and discussion took place regarding:

- The report covered a multitude of areas across Mid Devon Housing, ranging from Tenant Satisfaction Measures (TSM's), enforcement, building repairs and maintenance to rent recovery.
- Timing wise, the report was slightly behind with the data. Performance was holding up well, however, there continued to be recruitment challenges and long term sickness was putting pressure on the service.
- It was confirmed that safety works would always take priority.
- Rental income collection figures continued to improve on what was already a positive position.
- Tenants who presented as being repeatedly or longstanding in arrears were dealt with on a case by case basis. Officers worked hard to support tenants falling into this category by offering early advice and support where they could, for example, were tenants claiming all the benefits they were entitled to? Officers also signposted tenants to other support agencies such as food bank providers. It was accepted however that some tenants would never engage with the Council as their landlord. Sometimes properties were left unoccupied with the Council not knowing where the tenant had gone.
- It was confirmed that all the houses at St George's Court in Tiverton were now let. The 29 flats had needed adapting, for example, installing level flooring in the bathrooms. All but one of these adaptations had now taken place. The flats



were therefore very nearly ready to be let. There was an ongoing issue with the lifts but the Council was trying to resolve this with the manufacturer.

- The Council could not legally rent the flats until they had been valued by a Government appointed District Valuer for the purposes of setting the correct formula rent and arranging for them to do this was proving to be a lengthy process.

Note: \* Report previously circulated.

## 68 **VERBAL UPDATE ON TENANT SATISFACTION MEASURES (00:46:00)**

The Group received, and **NOTED**, a verbal update on the Tenant Satisfaction Measures (TSM's) by the Customer Engagement Co-ordinator which included the following information:

- This year the Council had opted for quarterly surveys rather than one annual survey for the Tenant Satisfaction Measures.
- The service were nearing the end of the surveys for Q4, there were approximately 15 more surveys to be completed to hit the target of 501 responses. This 501 responses gave the service the compliance it needed and would satisfy the Regulator. This was about 1 in 6 tenants who took the survey, so these were good numbers.
- The service was seeing an uplift in many areas of satisfaction this year.
- Full data would be provided at the next meeting. In the meantime, this data would be reported back to the Regulator and some tenant friendly communications would be put together to share the results.
- Tenants had been contacted throughout the previous quarters to follow up on any concerns that they may have raised in their survey and the service would continue to do this once the data for the final quarter came through.

## 69 **MID DEVON HOUSING (MDH) TENANCY MANAGEMENT POLICY (00:48:00)**

The Group had before it a report \* from the Head of Housing and Health. The Mid Devon Housing (MDH) Tenancy Management Policy had been reviewed and amended due to the Cabinet decision to end the use of Flexible tenancies. It was last reviewed in 2022 and therefore not many changes were required. The revised Tenancy Management Policy removed any reference to Flexible tenancies.

The contents of the report were outlined with particular reference to the following:

- The policy set out the requirements of tenants and the landlord.
- This had been updated in 2022.
- Because of the Cabinet decision to move away from Flexible Tenancies, any reference to this now needed to be removed from the policy hence why this had been brought before the Policy Development Group and as such this was merely a practical exercise.

Discussion took place regarding 'rights to succession' after the death of a tenant. It was explained that this was a historic concept which may no longer exists in specific circumstances but if a tenant had signed up to a tenancy when 'rights of succession' were in existence historically then that concept remained for that tenancy after the death of the tenant who had signed up to it.

**RECOMMENDED** to the Cabinet that:

The updated Mid Devon Housing Tenancy Management Policy and Equality Impact Assessment contained in Annexes A and B respectively be approved.

(Proposed by Cllr J Cairney and seconded by Cllr A Glover)

Reason for the decision

As a registered provider (RP) of social housing, the Council was obliged to take account of the standards contained within the revised regulatory framework which was administered by the Regulator of Social Housing (RSH). This stated that RPs should publish clear and accessible policies which outline their approach to tenancy management, including interventions to sustain tenancies and prevent unnecessary evictions, and tackling tenancy fraud.

Note: \* Report previously circulated.

**70 VARIATION TO STANDARD MID DEVON HOUSING TENANCY AGREEMENT (00:55:00)**

The Group had before it a report \* from the Head of Housing and Health. It was stated that the current Tenancy Agreement was launched in 2016 and was due for a review. However, as the Cabinet approved the Homes PDG recommendation that the use of Flexible Tenancies be halted further changes were required to the Tenancy Agreement to reflect this change and therefore there was a requirement to undertake a broad review of the agreement now.

The contents of the report were outlined with particular reference to the following:

- Lots of work had been going on in the background to update the Tenancy Agreement after Cabinet approved the Homes PDG recommendation to halt the use of Flexible Tenancies. There had been many changes since the last Tenancy Agreement was reviewed in 2016, in terms of legislation, regulation and internal policies and this new tenancy agreement, reflected that. There had been a delay due to extended legal review. However, the service was now at a stage where it could go out for the Section 103 Consultation.
- There were specific provisions related to this consultation in the Housing Act 1985, tenants would be sent a preliminary notice of variation which would inform them of the Council's intention to serve a Notice of Variation. In a nutshell, this was a 28 day consultation period where tenants would have the opportunity to comment on the Council's proposed Tenancy Agreement. The service would be including a 'changes at a glance' document to make things more tenant friendly. Drop in sessions would take place across the district as well as doing the usual online consultation through 'Lets' Talk Mid Devon' and shared across social media.
- The consultation would run after approval was provided by Cabinet in April, it would run for 28 days and would be sent to Members and partners at the same time.
- There would be more steps to follow after the consultation in line with the Housing Act 1985 with regards to sending notice of variation letters to secure

and introductory tenants and there would need to be a 4 week wait between sending these and the implementation date. This meant the Council would plan to go live with the new tenancy agreement hopefully by September time.

**RECOMMENDED** to the Cabinet that:

The procedure for the variation of tenancy conditions and updating the standard Tenancy Agreement, including formal consultation with tenants, commence in line with the Housing Act 1985 (sections 102 & 103).

(Proposed by Cllr J Cairney and seconded by Cllr H Tuffin)

Reason for the decision

As a registered provider (RP) of social housing, the Council was obliged to take account of the standards contained within the revised regulatory framework which was administered by the Regulator of Social Housing (RSH). This stated that RPs should meet all applicable statutory and legal requirements in relation to the form and use of tenancy agreements or terms of occupation.

The Social Housing (Regulation) Act 2023 was designed to strengthen the regulatory framework for social housing and to introduce a new proactive, consumer-led regulation regime focussed on meeting the needs of tenants.

Section 102 and 103 of the Housing Act 1985 provided that in England and Wales the terms of a secure tenancy (other than those implied by statute) may be varied, therefore correct compliance with legislation was a requirement to prevent any legal challenges.

Section 105 of the Housing Act 1985 sets out the Council's duties relating to consultation with tenants on matters of housing management. Following any consultation, the MDH would be obliged to give a minimum notice period of 4 weeks in advance of any change.

Note: \* Report previously circulated.

**71 DOWNSIZING WORKING GROUP REPORT (00:58:00)**

The Group had before it a report \* from the Head of Housing and Health. The Homes PDG established a Downsizing Incentives Working Group to investigate potential incentives that might encourage tenants to move from larger properties. The Group was tasked with gathering tenants' perspectives on desirable incentives and providing recommendations for an incentive scheme.

The contents of the report were outlined by the Chair of the Working Group, Cllr A Glover, with particular reference to the following:

- Feedback had been sought from tenants, there had been 76 responses and 70% of those had agreed that incentives should be offered for downsizing.
- All options had been considered by the Working Group and the ones recommended below had seemed the most helpful.
- It was confirmed that a budget could be found within the Housing Revenue Account to support these proposals.

- A number of difficult conversations had had to be had to reach this point.
- Officers thanked the Working Group for their hard work and dedication in conducting this exercise.

**RECOMMENDED** to the Cabinet that:

The Downsizing Incentives be developed by Officers and added as an addendum to the Allocations Policy with the following provisions:

- a) A maximum financial incentive of £1,000 for tenants downsizing by one bedroom.
- b) A maximum financial incentive of £2,000 for tenants downsizing by two or more bedrooms.
- c) Tenants could use the financial incentive to offset any recharges they might owe on their current property or to cover costs for moving, new carpets and/or redecoration in their new property. If no recharges are owed, they would receive the full incentive amount to use at their discretion.
- d) A direct let option for existing tenants to allow MDH to consider downsizing moves into newly void properties in specific circumstances in accordance with wider allocation policy.
- e) A communication plan including targeting of hard-to-reach tenants.
- f) One-to-one support for completing Devon Home Choice applications if relevant.
- g) A 12-month pilot scheme, followed by a review to assess the scheme's success and determine next steps.

(Proposed by the Chair)

#### Reason for the decision

Formulation of a Downsizing Incentive Scheme would encourage and support tenants to move to suitable accommodation. Tenants who were in receipt of benefits were affected by the 'bedroom tax' which provided a financial disincentive to remaining in a home which was larger than they needed. Promotion of mutual exchange scheme will encourage moves. Improved data collection on households would enable targeted contact with tenants under occupying.

Risks associated with this scheme had been considered although assessment would need to continue throughout the early life of the scheme. Whether the payment was sufficient to incentivise downsizing remained to be seen, although with the number of tenants looking to reduce numbers of bedrooms in their properties expected to increase, another risk was that the HRA resource was being paid to support moves which would have happened anyway.

Note: \* Report previously circulated.

## **72 TENANT INVOLVEMENT STRATEGY (01:05:00)**

The Group had before it a report \* from the Head of Housing and Health. Under the Regulator of Social Housing's Transparency, Influence and Accountability Standard Registered Providers (RPs) must take tenants' views into account in their decision-making about how landlord services are delivered.

The contents of the report were outlined with particular reference to the following:

- The Tenant Involvement Strategy for 2025-2030 set out a clear vision for strengthening tenant engagement over the next five years, ensuring tenants have a meaningful role in shaping the services they receive.
- Tenant involvement was at the heart of delivering an excellent housing service. The Transparency Influence and Accountability Standard, introduced in April 2024 required the Council to work more closely with tenants to ensure their voices shaped the way the Council delivered services. This was not just about meeting regulations but about building stronger, more engaged communities and ensuring the Council was accountable to our tenants.
- The strategy was built around four core principles which were strengthening engagement and participation, communication and insight, accountability and fairness, respect and diversity. This built on progress made since 2021. The Council had come quite far since its last strategy, engagement had improved, it was more meaningful, tenants were being listened to who had never had interactions with the Council before. The year ahead would see co-opted tenants joining the Homes PDG. All round the service was better aligning its commitment to continuous improvement. However, there was still more to do to ensure all tenants felt engaged and able to participate in a way that suited them. The hope was that this strategy would help support that.
- Included as well was a one year action plan, this would be updated yearly as the next 5 years progressed to ensure the service was implementing this strategy as agreed.

**RECOMMENDED** to the Cabinet that:

The updated Mid Devon Housing Tenant Involvement Strategy and Equality Impact Assessment contained in Annexes A and B respectively be approved.

(Proposed by Cllr A Glover and seconded by Cllr J Cairney)

#### Reason for the decision

As a registered provider (RP) of social housing, the Council was obliged to take account of the standards contained within the revised regulatory framework which was administered by the Regulator of Social Housing (RSH). This stated that RPs must take tenants' views into account in their decision-making about how landlord services were delivered.

Note: \* Report previously circulated.

## **73 MID DEVON HOUSING RENT ERROR UPDATE (01:08:00)**

The Group had before it a report \* from the Deputy Chief Executive (S151) and the Head of Housing and Health updating it on the corrective measures completed and next steps in order to rectify an identified historic rent setting error.

The following was highlighted in the report and discussion took place regarding:

- The PDG were asked to note the number of actions which had already been commenced to correct this issue and which were ongoing. There had been substantial progress and dedicated resource had been provided to correct this issue.
- Current and ongoing rent had now been corrected and updated bills sent out to tenants. The current rent formula had been reviewed externally and assurance provided it is now wholly correct.
- There were up to 70 historic evictions for rent arrears (all or in part) which may have involved tenant who overpaid rent. These would be investigated individually against the mitigation set out in the report.
- It was explained that the Regulator would like to see a clearer Member decision on this process hence the report before the PDG with a recommendation to the Cabinet on the overarching approach.
- The Revenue and Benefits team worked very closely with the Department of Work and Pensions (DWP) to obtain and deal with the relevant data.
- It was confirmed that some other local authorities were in the same position. It may not be known at this stage whether or not the DWP assisted a tenant with their rent via their benefits. The Council needed to bear this in mind when assessing the refund position in each case. More informed and complex discussions needed to be had with DWP reflecting the importance of their role in this process.
- A refund policy had been drafted and every effort would be made to refund those tenants owed money in as timely a manner as possible.
- An update would be provided to tenants in April, as well as the media.
- There had been limited contact from tenants on this matter, information provided through the various media channels had been good.
- The complexities involved could not be under estimated in the determining of each case, for example, some tenants had gone into and out of the benefit system during the course of their tenancy. Issues in relation to Housing Benefit and Universal Credit would also come into play and need to be factored in.
- There were FAQ's on the website and officers were always there to offer advice and support to housing tenants.
- Sometimes it took new auditors to do a deep dive in order to pick issues up and this is what had happened on this occasion.
- Local DWP officers had been extremely helpful but it was understood that there are DWP system issues preventing the easy resolution of these matters. The Universal Credit system was initially created at pace and there were limitations to the type of data retained. The Council would still push forward to the best of its ability so that nobody was prejudiced by unlawful delay.
- Members were advised that if any of their constituents had any concerns then they needed to contact the Council as soon as possible. Tenants needed to be advised in the appropriate manner and letters did not always get read.

**RECOMMENDED** to the Cabinet that:

1. The tasks that have been further progressed in order to correct this situation be noted.



2. Approval be given for the overarching approach to the review of historic MDH possession proceedings (evictions) where rent overpayments were made as set out in section 2 of this report.

(Proposed by the Chair)

Reason for the decision

The activity of MDH is funded through the Housing Revenue Account (HRA). The HRA is ring fenced and subject to specific financial controls.

Significant financial modelling has been undertaken in order to reach some of the key decisions being put forward in the Cabinet report in December 2024. We have also reflected on current balances and reserves held by the HRA and other legislative requirements that have to be delivered when evaluating how to correct this historic rent setting error. This modelling continues to be refined and further work is largely now dependant on further guidance and advice from the DWP as set out within the report.

While the current analysis shows that the majority of those affected have been historically undercharged, the position previously agreed is unchanged and there is no intention or ability to recover lost funds.

Therefore, it continues to be the case that the totality of the impact is experienced as a cost to the HRA rather than a rebalancing.

Note: (i) \* Report previously circulated.  
(ii) Cllr A Glover declared a personal interest as she was a Council tenant.

**74 CHAIR'S ANNUAL REPORT FOR 2024/2025 (01:47:00)**

The Group had before it, and **NOTED**, the Chair's annual report \* for 2024/2025.

This report along with all other Chair's reports for 2024/2025 would be presented at full Council on 23<sup>rd</sup> April 2025.

Note: \* Report previously circulated.

**75 IDENTIFICATION OF ITEMS FOR THE NEXT MEETING (01:48:00)**

The items already listed in the work programme for the next scheduled meeting were **NOTED**. In addition to this the following was requested to be on the agenda for the next or a future meeting:

- A report outlining the value for money of 'modular builds' versus 'traditional builds'.
- An update on the Rent Error issue.
- An update on workforce issues / Apprenticeships / contractors.
- Private VOIDS and any progress?
- An update on the Downsizing recommendations.
- An update on the St George's development.



It was **NOTED** that the newly Co-Opted tenants would be joining the Policy Development Group for their first meeting in June.

(The meeting ended at 4.07 pm)

**CHAIR**

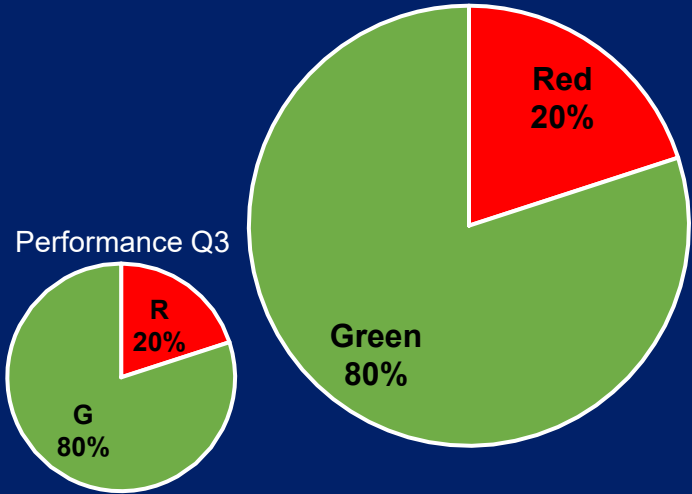
Homes PDG Performance Dashboard (General Fund) – Quarter 4 2024/25

Performance Measures	Performance	Annual Target	RAG
Providing support to those experiencing homelessness	100 %	100 %	G
Applicants on the Devon Home Choice waiting list (Band A-C)	536	N/A	
Households in Hotels (Current)	15	N/A	
Households placed in interim or temporary accommodation this quarter	77	TBC	
Home Improvement Loans sanctioned (YTD)	13	10	G
Private rented sector improvements (YTD)	12	10	G
Private sector housing service requests response rate (Av. YTD)	95.3 %	95 %	G
Unoccupied and unfurnished empty homes (Current)	479	N/A	

Finance Measures	Performance	Annual Target	RAG
Homes PDG – Outturn	£224k	£393k	R
Spend on external interim and temporary accommodation (Q4)	£463k	N/A	

Corporate Risk	Risk Rating (Trajectory)
Homes for Ukraine Scheme	4 (No Change)

Overall Performance Q4



In Focus

Support was provided to 100% of those experiencing homelessness in 2024/25. There was a slight decrease in the number of homelessness approaches in 2024/25 compared to the previous year (771 in 2024/25; 802 in 2023/24), but the complexity of cases is increasing.

The Homes PDG (General Fund) is showing an underspend due to the late Homelessness Prevention Grant of £241k being received in 2024/25. Without that the service has slightly overspent, hence Red RAG status.

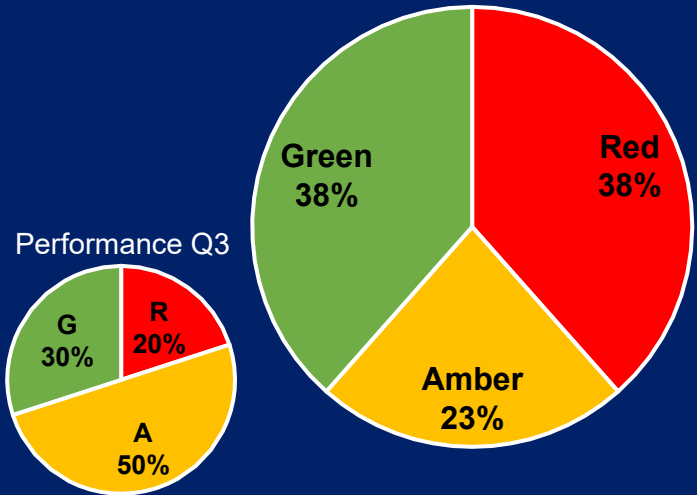
Homes PDG Performance Dashboard (HRA) – Quarter 4 2024/25

Performance Measures	Performance	Annual Target	RAG
MDH Satisfaction that the home is safe (TSM – TP05)	79 %	70 %	G
MDH Delivery of new Social Housing (YTD)	29	100	R
New MDH net-zero MMC properties (YTD)	8	50	R
Tenant satisfaction with the overall repairs service (TSM – TP02)	72 %	70 %	G
Market delivery of new affordable homes (YTD)	57	94	R
MDH Overall tenant satisfaction (TSM - TP01)	70 %	TBD	
MDH Complaints responded to within Complaints Handling Code timescales (TSM-CH02; Average YTD)	98.8%	100 %	A
MDH Antisocial behaviour cases relative to the size of the landlord (TSM – NM01; YTD)	9.82	TBD	
MDH Housing stock occupancy rate (YTD)	97.5 %	97 %	G
MDH Routine repairs completed on time (Average YTD)	99 %	95 %	G
MDH specific tenant engagement events (YTD)	206	100	G

Finance Measures	Performance	Annual Target	RAG
HRA – Outturn	£1,698k	£0	R
HRA – Tenant Income (Outturn)	(£14,320k)	(£14,641k)	R
HRA – Capital Outturn	£14,131k	£14,816k	A
HRA – Capital Slippage % of development projects (Current)	24%	0 %	A

Corporate Risk	Risk Rating (Trajectory)	Corporate Risk	Risk Rating (Trajectory)
Housing Crisis	12 (No Change)	Housing Rent Correction Error	8 (No Change)

Overall Performance Q4



In Focus

In 2024/25, 72% of tenants were satisfied with the overall repairs service (target: 70%). This measure is set nationally as part of the Tenant Satisfaction Measures (TSMs).

Another TSM which is part of the Corporate Plan is satisfaction that the home is safe. In 2024/25, 79% of Council tenants agreed that they felt their home was safe, against a target of 70%.



## Report for:

## HOMES POLICY DEVELOPMENT GROUP

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Date of Meeting: 3<sup>rd</sup> June 2025

Subject: **MID DEVON HOUSING COMPLAINTS  
HANDLING REPORT**

Cabinet Member: Councillor Jane Lock, Cabinet Member for Housing, Assets and Property

Responsible Officer: Simon Newcombe, Head of Housing & Health

Exempt: None

Wards Affected: All

Enclosures: Annex A shows how Mid Devon Housing (MDH) is performing against the Regulator of Social Housing (RSH) Tenancy Satisfaction Measures (TSM) in complaint handling for the financial year 2024-25

Annex B shows the results of MDH's Perception survey results in complaint handling for the financial year 2024-25

Annex C contains the outcome of the required MDH's self-assessment against the revised Housing Ombudsman Service (HOS) Complaints Handling Code (the Code) for the financial year 2024-25

Annex D provides a summary of lessons learned arising from complaint handling during the financial year 2024-25.

Annex E (i) shows MDH's data relating to complaints received and closed during the financial Year 2024-25.

Annex E (ii) shows MDH's complaints data category

during the financial year 2024-25.

Annex F shows the outcome of HOS determinations during 2024-25.

Annex G shows HOS Landlord Performance Report – Mid Devon District Council for 2023-24 (most recent available report)

Annex H provides the MDH Complaint Handling Complaint Handling Summary Report for Tenants 2024-25

## **Section 1 – Summary and Recommendation(s)**

In summary, the report provides the following information as set out below and contained in Annexes A, B, C, D, E, F and G.

- A general overview of the social housing legislation;
- A general overview of the role of the RSH;
- An annual review of how MDH is performing against the Regulator's Tenancy Satisfaction Measures in complaint handling;
- An overview of HOS recent updates, Spotlight reports and good practice to improve complaint handling;
- An annual review of MDH's self-assessment against the HOS Complaints Handling Code;
- An overview of how MDH uses reports on complaint handling to drive service improvement forward from lessons learnt;
- The outcome of MDH's Perception survey results in complaint handling;
- An annual update of MDH's complaint handling data for the financial year 2024-25 to Members;
- An overview of MDH cases determined by the HOS; and
- An update on MDH resources, remedies and an update on the Council's new complaint handling system.

### **Recommendation(s):**

**Members of the PDG are asked to note the report and annexes.**

## **Section 2 – Report**

### **1 Introduction**

- 1.1 Increased tenant satisfaction is at the heart of major changes to the regulatory landscape for social housing that have been implemented by the Government. Central to this change is an enhanced complaints handling approach required of social housing providers by the Regulator of Social Housing (RSH). Overall, it puts in place one of the most comprehensive, proactive consumer regulation regimes covering local government and private social landlords.

- 1.2 The Social Housing (Regulation) Act 2023 placed the Complaints Handling Code (the Code) onto a statutory footing. It also put a duty on the Housing Ombudsman Service (HOS) to monitor compliance with the Code. With a statutory Code there is a legal duty on landlords to comply with it. The HOS will be able to intervene with a landlord on the Code even when the HOS have not received a complaint.
- 1.3 This report sets out:
- A general overview of the Social Housing (Regulation) Act 2023;
  - A general overview of the role of the RSH;
  - An overview of MDH's performance against the Regulator's Tenant Satisfaction Measures in complaint handling for the financial year 2024-25;
  - An overview of HOS recent updates, Spotlight reports and sharing of good practice to improve complaint handling;
  - An update on MDH's compliance with the HOS's Complaints Handling Code;
  - How MDH uses reports on complaint handling to drive service improvement forward from lessons learnt;
  - The outcome of MDH's Perception survey results in complaint handling for the financial year 2024-25;
  - An annual update of MDH's complaint handling data for the financial year 2024-25 to Members;
  - An overview of MDH cases determined by the HOS and Local Government & Social Care Ombudsman (LGSCO) during the financial year 2024-25;
  - HOS Landlord Report for Mid Devon District Council for the financial year 2023-24; and
  - An update on MDH resources, remedies and an update on the Council's new complaint handling system.
- 1.3 Annex A shows how MDH is performing against the RSH's TSM's for the financial year 2024-25.
- 1.4 Annex B shows MDH's tenant satisfaction against the TSM's for the financial year 2024-25.
- 1.5 Annex C contains the outcome of MDH's self-assessment against the revised HOS Complaints Handling Code. The length, detail and format of the self-assessment are fixed by the HOS and provides the core, transparent basis of measuring compliance with the Code.
- 1.6 Annex D provides examples of lessons learned from complaint handling during the financial year 2024-25.
- 1.7 Annex E (i) shows MDH's performance relating to complaints during the financial year 2024-2025.

- 1.8 Annex E (ii) shows MDH's complaints closed by category during the financial year 2024-25.
- 1.9 Annex F shows the outcome of MDH cases determined by the HOS and LGSCO during the financial year 2024-25.
- 1.10 Annex G shows HOS Landlord Report for Mid Devon District Council for the financial year 2023-24. The report for 2024-25 has not been produced yet by the HOS and therefore is not currently available.
- 1.11 Provides a bite-sized, tenant and public friendly summary of this report and our complaints handling data and outcomes for the financial year 2024-25 This will be shared directly with tenants who will also be signposted to this report and other Annexes for the full information.

## **2 Overview of the Social Housing (Regulation) Act 2023**

- 2.1 After receiving Royal Assent in July 2023, the Social Housing (Regulation) Act 2023 has since been implemented in 2024. The legislation has given greater powers to the RSH to tackle failing social landlords and tenants living in unsafe homes.
- 2.2 It also provides the RSH powers to carry out regular inspections of social landlords and the power to issue unlimited fines to rogue social landlords.
- 2.3 The HOS have also been given powers to publish best practice guidance to landlords following investigations into a tenant's complaint.
- 2.4 With the implementation of Awaab's Law, the Act provides greater powers to set strict limits for social landlords to address hazards relating to damp and mould and other health and safety risks.
- 2.5 The Social Housing (Regulations) Act also introduced new enforcement powers that will be made available to tackle failing social landlords who are not taking swift action to address poor quality and unsafe homes.
- 2.6 The Social Housing (Regulations) Act drives forward significant change in holding poor landlords to account, ensuring the needs of tenants are at the heart of government reforms and to improve the quality of life for those living in social housing across the country.

## **3 Overview of the role of the Regulator**

- 3.1 The RSH operates the regulatory framework which contains a number of standards which set out the required outcomes and specific expectations associated with the performance of registered social landlords.
- 3.2 The RSH standards came into force from 1 April 2024. The standards provide stronger protection to tenants and improve services they receive. They will



also give tenants greater power to hold their landlord to account when they are under performing.

### 3.3 Overall the standards:

- Protect tenants by strengthening the safety requirements that all social landlords will be expected to meet;
- Require landlords to know more about the condition of their tenant's homes and the individual needs of the people living in them. Landlords will be expected to use this evidence to provide safe and decent homes with good quality landlord services;
- Make sure landlords listen to tenants complaints and response quickly when they need to put things right; and
- Require landlords to be open and accountable to their tenants and treat them with fairness and respect.

3.4 The Transparency, Influencing and Accountability Standard contains provisions relating to how landlords must be open with tenants and treat them with fairness and respect. This is so that tenants can access services, raise complaints when necessary and influence decision-making and hold their landlord to account.

3.5 What this means for MDH, is that we will be expected to comply with specific requirements of the standards in relation to complaint handling. Landlords will need to ensure their approach to handling complaints is simple and accessible. The standard requires landlords to be transparent with tenants, treat them fairly and respectfully so they can access services. Tenants must be able to voice concerns where necessary, influence decisions and hold the landlord accountable for their actions.

## 4 Overview of Tenant Satisfaction Measures regarding complaints

4.1 Registered providers of social housing (RPs) are required to collect and provide information to support effective scrutiny by tenants of their landlord's performance in managing their homes and neighbourhoods.

4.2 As part of the consumer regulation regime that was introduced in April 2023, the RSH introduced 22 mandatory TSMs, covering five themes. 10 of these measure by landlords directly and 12 are measured by landlords carrying out tenant perception surveys. 3 of the specific questions asked relate to complaint handling.

4.3 The TSM's form part of the key benchmark for all major registered providers of social housing including MDH. The emphasis behind these measures is clearly on tenant experience or satisfaction and how tenants feel we are performing alongside management information on repairs, safety, complaints handling and anti-social behaviour.

4.4 MDH are required to submit TSMs data relating to complaint handling to the RSH each year as shown below:

- TP09: Satisfaction with the landlord's approach to handling complaints
  - CH01: Complaints relative to the size of the landlord
  - CH02: Complaints responded to within Complaint Handling Code timescales
- 4.5 Annex A outlines how MDH is performing against the RSH's TSM's in complaint handling for the financial year 2024-25. The CH01 measure based on the number of complaints the landlord receives for each 1000 homes they own shows that MDH have received 75 stage 1 and 2 complaints for every 1000 properties. CH02 measure based on the number of complaints responded to within the Complaint Handling Code highlighted that MDH responded to 180 (98.9%) of stage 1 complaints and 27 (100%) stage 2 complaints in accordance with the Code.
- 4.6 The above figures will differ, as at the time of reporting (31 March 2025), there were complaints pending investigations. In addition, we may see an increase of complaints escalated to stage 2 over the next year. The above figures only show complaints that come under the remit of the Regulator's Tenancy Satisfaction Measures and do not include non-housing ombudsman complaints. Please refer to point 8.10 which provides an explanation of non-housing ombudsman complaints.
- 4.7 Annex B shows MDH's tenant satisfaction against the Tenant Satisfaction Measures in complaint handling. TP09 sets satisfaction with the landlord's approach to handling complaints. MDH sent a perception surveys to all tenants quarterly during 2024-25 except for quarter 1. The outcome of these shows as follows:
- Quarter 2, 33% of tenants satisfied with MDH's approach to complaint handling
  - Quarter 3, 45% of tenants satisfied with MDH's approach to complaint handling
  - Quarter 4, 33% of tenants satisfied with MDH's approach to complaint handling

#### **Overall satisfaction 37%**

- 4.8 Overall, we have seen an increase in satisfaction levels this year of 37% compared to 2023-24 where we saw 22.2% of tenants satisfied with MDH's approach to complaint handling. This saw an increase by 14.8%. This is a significant uplift and is further welcome against what is the most challenging area to measure customer satisfaction for all providers and the MDH specific context of the housing rent error issue which impacted all tenants and the regulatory judgement by the RSH.
- 4.9 The RSH will collate and publish the national data for all relevant social landlords for 2024-25 in due course, consequently we don't currently have a national benchmark figure for the relevant year. Nonetheless, the average TP09 satisfaction figure for all landlords in the first year of the TSM survey (2023-24)

was 35%, so the latest MDH figure is slightly above that average. We have also obtained the TP09 figures for Exeter and East Devon councils for 2024-25 which were 30% and 17% respectively, there MDH have performed well locally.

## **5 Overview of the Housing Ombudsman Service**

- 5.1 The role of the HOS is to resolve disputes involving members of the Scheme including making awards of compensation or other remedies when appropriate and supporting effective landlord-tenant dispute resolution by others.
- 5.2 The HOS expects landlords to have in place an effective and positive complaint handling process. This facilitates landlords having insight into the services provided by them and how they are perceived and received by others.
- 5.3 The lessons learned from a complaint can improve the quality and focus of services provided, whether this is to the individual tenant or to a collective group of tenants. The learning process can strengthen landlord and tenant relationships as well as provide a mechanism for encouraging positive tenant engagement.
- 5.4 Since the Social Housing (Regulations) Act was implemented, this has seen the HOS having greater powers to hold failing landlords to account as well as publish best practice guidance to landlords following their investigations for example Spotlight reports and Good Practice reports.

### **HOS Spotlight reports**

- 5.5 The HOS have concentrated on key areas of service provision where they see a high amount of failure through their casework. They examine the issues and set out recommendations and good practice within their Spotlight reports. Below is an example of a Spotlight report that the HOS have focussed on during the last year.

### **Follow up report – Spotlight on noise, time to be heard**

- 5.6 In April 2024, the HOS released a follow up report – Spotlight on noise, time to be heard. This Spotlight report was a follow up from the previous Spotlight on noise report, time to be heard published in November 2022.
- 5.7 The HOS contacted landlords that had attended their initial webinar and all those landlords who featured in the first spotlight report. In addition, the HOS contacted an additional 5 landlords who had not featured in the original Spotlight report but had seen an increase in their maladministration rate in regarding to noise or anti-social behaviour (ASB) complaints.
- 5.8 The HOS asked landlords what changes or improvements they had made, or intended to make as a result of the original Spotlight report and any recommendations they made in response to this report.
- 5.9 Recommendations that were made include the following:

- Review of policy and procedures in response to noise nuisance;
- Amend the landlord's Void Policy by including sound proof measures and fitting carpets to those properties where the landlord had identified as noise being an issue;
- Change the language, attitude and communications used when reviewing noise issues. One landlord reviewed the tone that they used in their letters;
- Improved knowledge and information management system to enable to have a housing system in place that could efficient record housing cases; and
- Worked in more partnership with multi-agencies to try and resolve noise issues.

### **Memorandum of Understanding**

- 5.10 During July 2024, the HOS and RSH set out how they would continue to work together.
- 5.11 The Memorandum of Understanding reflects the HOS and RSH's new powers under the Social Housing (Regulations) Act.
- 5.12 Both bodies are committed to strengthening the accountability of social landlords for providing safe homes, quality services and treating tenants with respect.
- 5.13 The Memorandum of Understanding sets out a new framework of communication, cooperation and exchange of information between the HOS and RSH and explains how each body will work together to deliver their individual roles.
- 5.14 Under the Social Housing (Regulation) Act 2023, the Memorandum of Understanding is now a statutory document.
- 5.15 The Memorandum includes commitments for:

**Complementary approaches:** both bodies will strive to achieve a compatible approach while respecting their independent roles.

**Early communication:** they will engage in early-stage communication on issues with potentially significant implications for each other.

**Signposting:** enquirers will be directed to the appropriate organisation, with clear explanations provided.

**Regular meetings:** regular communication, including meetings at various levels of seniority, will be maintained to discuss mutual interests and stakeholder engagement.

**Promoting understanding:** efforts will be made to promote understanding of their respective roles among residents and landlords.

**Consistent communication:** consistency will be ensured in how they communicate about each other's roles.

- 5.16 Specific areas of information exchange have been set out, including the sharing of data about landlords, coordination on specific cases, intelligence on sector risks and advance notifications of publications and enforcement actions. The HOS and RSH wrote to all social landlords in July 2024 setting out how they will work together under the Memorandum.

### **Open letter to social housing Chief Executives**

- 5.17 The HOS wrote to all social housing Chief Executives in July 2024 to raise concerns about the handling of some cases involving windows including residents raising concerns over health and safety.
- 5.18 Following their investigations, it showed that landlords had not always responded in a timely way and sometimes vital window repairs had been deferred. They provided examples of one case they had investigated that a window eventually fell out onto a garden below, whilst another case showed that residents had their windows boarded up for years.
- 5.19 The HOS have raised that they acknowledge that there is a significant stretch being placed on the social housing sector, however it remains vital that landlords fulfil their obligations to ensure that homes are decent, safe, secure and well maintained.
- 5.20 There is now a great emphasis on landlords to learn from the examples provided by the HOS in regards to poor practice ensuring that landlords are considering the risks and their obligations when carrying out their day to day repairs. MDH will take on board recommendations made by the HOS.

### **Call for evidence – Repairing Trust**

- 5.21 The HOS launched in August 2024, its latest 'Call for Evidence' to inform its next Spotlight report, titled 'Repairing Trust', which will explore common issues in housing maintenance.
- 5.22 This follows an unprecedented rise in complaints relating to disrepair, combined with increasing costs and skills shortages. In many cases, this is significantly impacting upon residents' safety in their homes.
- 5.23 The HOS will cover 4 themes, as shown below:
- What are the main issues landlords face when contracting services, what causes these issues and what impact do they have?
  - What problems do residents encounter with these services, the underlying reasons and their effects?
  - What barriers do operatives experience in delivering services, the root causes and the repercussions? And
  - What are the lessons learned from cases with no maladministration and successful initiatives within the sector?

5.24 The report is pending publication.

### **HOS Annual Complaints Review**

5.25 The HOS published its Annual Complaints Review 2023-24 in November 2024, revealing it made 21,740 interventions to put things right for residents, ranging from doing repairs to paying compensation and improving practices – a 329% increase.

5.26 It has also published 271 landlord performance reports and written to 126 landlords where failings were found in 75% or more of its decisions – compared to just 25 landlords for the previous last year.

Other key figures include:

- 73% of decisions resulted in maladministration because the landlord did not follow its legal requirements, policy or process;
- 4% point rise in severe maladministration to 856 findings, or 7% of all decisions, with the no fault rate falling from 25% to 15%;
- 73% of property condition findings upheld, 84% for the handling of the complaint, 68% for anti-social behaviour and 62% for health and safety, including building safety - every complaint category has seen an increase;
- The area with the highest proportion of findings upheld was London at 77% compared to the lowest of 62% in the North East and Yorkshire, with every region witnessing an increase; and
- 9 landlords received more than 5 failure orders for non-compliance with the Complaint Handling Code or cooperating with investigations.

5.27 The impact on residents' lives and welfare of poor services and conditions is apparent in the complaints investigated throughout the year. The HOS said that this includes declining school attendance amongst children living with untreated damp and mould, repair delays forcing a father to carry his severely disabled daughter up and down the stairs every day and a doctor advising that housing conditions could have led to a resident's lung infection. In several cases of disrepair residents have referred to visiting hospital while waiting for works.

5.28 The HOS is encouraging landlords to learn from this review. Its Centre for Learning has eLearning modules and workshops to give housing professionals free-to-access materials to improve services. The Centre for Learning also provides case studies, reports, podcasts and more on key topics the sector is facing.

### **Good practice on relationship management**

5.29 In January 2025, following consultation with landlords the HOS said they would be releasing its first Good Practice guidance later in the year which will focus on relationship management between landlords and their residents. The Good

Practice will also look at restoring relationships which have broken down between the landlord and resident.

- 5.30 Greater powers were introduced as part of the Social Housing (Regulation) Act for the HOS to share good practice.
- 5.31 The Good Practice will establish a framework for landlords like MDH to aid problem solving in areas of their work that can regularly result in complaints. It will also share practical lessons with landlords with the aim to reduce the need for residents to raise a complaint or refer a case to the HOS.
- 5.32 Landlords will have access to a self-assessment against the guidance which in turn will support the learning and development of improvement plans. Landlords will be encouraged to test themselves to learn from complaints, which can act as a unique catalyst for positive, lasting change. MDH welcome this new addition of support that the HOS will be offering landlords.

### **Annual Report and Accounts**

- 5.33 In February 2025 the HOS issued their Annual Report and Accounts for complaint handling. This was for the financial year 2023-24. The report highlighted that one of the most significant features of the 2023-24 was the 107% increase in the number of investigations completed. Casework demand continued to rise from 2022-23 with overall volumes increasing by 27%. The volume of cases coming to the HOS for formal investigation also increased by 60%. During 2023-24, the HOS made 22,000 orders and recommendations compared to the previous year in 2022-23, which were 6,575.

### **Awaab's Law**

- 5.34 In February 2025, the HOS issued a statement on Awaab's Law. This comes following the government's announcement it will bring Awaab's Law into force for damp and mould in the social rented sector from October 2025 and then will extend to a wider range of hazards from 2026. The law is an important step towards helping millions of people, including 1 million children to live in a safe and decent home.

### **HOS and LGSO joint procedures**

- 5.35 The HOS released in February 2025, a new joint operating procedure that had been agreed between the HOS and LGSCO. This sets out the HOS's approach to working with the LGSCO on cases where there are overlapping housing issues.
- 5.36 The HOS investigates complaints and resolves disputes involving the tenants and leaseholders of social housing landlords.
- 5.37 The LGSCO investigates complaints about most council services.
- 5.38 Examples of topics that may suggest the need for joint working include:
  - Crossover between rent arrears and housing benefit;



- Temporary accommodation and the housing management function of the landlord; or
- Anti-social behaviour (ASB) and an ASB case review.

## **6 Complaints Handling Code**

- 6.1 The HOS originally introduced the Code in July 2020. The Code sets out guidance so that landlords respond to complaints effectively and fairly. The Code was introduced as part of the HOS's powers in the revised Housing Ombudsman Scheme under the wider consumer-led changes to regulation of social housing.
- 6.2 Since the Code was first introduced, it has been reviewed and strengthened to implement the provisions in the Code to support a more joined up approach to complaint handling as well as to support a positive complaint handling culture.
- 6.3 Furthermore, since the Code was put on a statutory footing, this has given the HOS greater powers to monitor landlord's compliance with the Code and holding them to account for non-compliance.
- 6.4 The HOS released data in July 2024 that they have issued the highest record of Complaint Handling Failure Orders to landlords who have not complied with orders following issuing their determinations.

### **Self-assessment against Code**

- 6.5 Landlords including MDH are required to carry out an annual assessment against the Code. This is to ensure their complaint handling is in accordance with the requirements of the Code. Non-compliance of the Code could result in the landlord being issued with a Complaint Handling Failure Order by the HOS.
- 6.6 The Code acts a guide for tenants which sets out what they can and should expect from their landlord when they raise a complaint. The requirements of the Code also provides tenants information about MDH's complaint handling and the different stages on how to progress their complaint through the internal complaints procedure.
- 6.7 MDH's annual self-assessment against the HOS's Complaints Handling Code is included in Annex C. The length, detail and format of the self-assessment are fixed by the HOS and provides the core basis of measuring compliance with the Code. Landlords are expected to review the Code annually or when there has been a major change such as a restructure or merger.
- 6.8 MDH self-assessed against the Code in March 2025 taking into account the housing restructure of MDH. Relevant changes were made to show compliance with the Code.

- 6.9 MDH's self-assessment shows a comprehensive level of compliance with the Code. This means our processes should be considered effective when it comes to handling complaints.
- 6.10 As a result of MDH's self-assessment against the revised Code in 2024-25, the corporate Complaints and Feedback Policy was reviewed to take into account changes of the HOS Code and those changes identified to the Local Government & Social Care Ombudsman Service Complaint Code. The revised Complaints & Feedback Policy was implemented across the Council in August 2024.

## **7 Learning**

- 7.1 Landlords are expected to learn from complaints. The lessons learned from a complaint can improve the quality and focus of services provided, whether this is to the individual tenant or to a collective group of tenants. The learning process can strengthen landlord and tenant relationships as well as provide a mechanism for encouraging positive tenant engagement.
- 7.2 The HOS expects landlords to consider their dispute resolution principles and to learn from complaint outcomes.

### **Lessons Learned**

- 7.3 The report in Annex D shows an overview of the types of complaints the landlord has received, identifies the lessons learned and provides an example of service improvement as a result of complaints closed during the financial year 2024-25. This list does not include common lessons learned such as improving communications, compliance with policy and procedure or staff/contractor relations.
- 7.4 Within the upheld complaints, some 13 specific lessons learnt were identified and actioned as a result of the service review and continuous improvement process.
- 7.5 MDH also carry out monthly strategic insight/focus meetings to discuss complaint handling data, identify themes alongside reviewing progress on implementing lessons learnt. Outputs from these meetings are feedback into a structured performance management process which all service managers and team leaders participate in.
- 7.6 During 2024-25, we have promoted the improvements we have made via our social media and web pages.

## **8 Performance relating to Complaints 2024-25**

- 8.1 Complaint handling performance is reviewed each month at a strategic level with the aim of identifying:
- Any high risk areas of work;
  - Any systemic issues; and

- Any issues which need to be escalated for discussion at a more senior level.
- 8.2 MDH have seen a slight decrease in both Stage 1 and 2 complaints during the financial year 2024-25 in comparison to the previous financial year. This means we were able to resolve more complaints at stage 1 than before i.e at an earlier stage to the satisfaction of the resident. However it is noted that although complaints have decreased slightly, we have seen that complaints have become more complex and additional complaints have been raised in individual complaints. Therefore, the figures do not show a true reflection of the number of complaints being reported.
- 8.3 Overall, of the 210 Stage 1 complaints and 34 Stage 2 complaints which were received during the financial year 2024-25. As at 31 March 2025, 204 or 98.5% of complaints were completed at Stage 1 and 31 or 100% were completed at Stage 2. These figures includes all complaints (Both HOS complaints and non-housing complaints) This compares to 219 or 98.6% at Stage 1 and 56 or 87.5% at Stage 2, closed in 2023-24.
- 8.4 Some 101 or 49.5% of Stage 1 complaints were upheld during 2024-25. Furthermore, 18 or 58.1 %Stage 2 complaints were upheld during 2024-25. This compares to 48.4% for stage 1 complaints in 2023-24 and 30.4% for stage 2 Complaints, so a similar stage at stage 1 and an increase in number of cases upheld at stage 2.
- 8.5 To provide context, MDH have a housing stock of 2840 properties, of the 210 Stage 1 complaints received in 2024-25 this equate to around 7.39% of our housing properties with 92.61% of properties therefore having no recourse to make a complaint. We have 3529 formal tenants living in our properties
- 8.6 A full breakdown of complaints across eighteen categories is provided in Annex E, however a summary of the top and lowest five categories for complaints is provided below:

#### **Top 5 (most common) complaints categories**

1. Routine repairs - 46
2. Other Planned maintenance - 28
3. Non housing ombudsman - 25
4. Planned maintenance - 22
5. Tenancy Management - 18

Comparing these figures with 2023-24 figures below, this highlights similar categories of complaints but in a different order. The only difference is the Communications category is no longer in the top 5 and has been replaced with Planned Maintenance.

#### **Top 5 (most common) complaints categories (2023-24)**

1. Non-housing ombudsman – 37
2. Routine repairs - 32
3. Communication – 32

4. Other Planned maintenance – 21
5. Tenancy management – 20

#### **Bottom 5 (least common) complaint categories (2024-25)**

1. Emergency repairs - 0
2. Nuisance - 0
3. Voids - 0
4. Disable Adaptations - 2
5. Allocations & Lettings/ASB - 4

Comparing these figures with 2023-24 figures below, this highlights similar categories of complaints, however in a slightly different order.

#### **Bottom 5 (least common) complaints categories (2023-24)**

1. Emergency repairs – 1
2. Disabled adaptations – 2
3. Nuisance – 4
4. Allocations and lettings – 6
5. Voids – 6

- 8.7 Routine repairs are the most common complaint, however this is largely reflective of the volume of activity with many thousands of repairs completed annually. Nonetheless, tenant satisfaction surveys provide additional data and enable specific attention is focused on this key area which run alongside contract management approaches to intervene early in any systematic issues arising from external contractors.
- 8.8 During the financial year 2024-25, we have been able to obtain further feedback about how satisfied/dissatisfied tenants have been with our Repairs Team by surveying tenants via Scapevoice. By surveying our tenants after completion of a repair, this helps us to identify any systematic issues sooner, reduces complaints and highlights areas of improvement.
- 8.9 For clarity, Non Housing Ombudsman Complaints are complaints reported by non MDH tenants and leaseholders about MDH services, for example, lifeline services, garage management, the condition of our estates, noise nuisance and these are not included in the TSM's. Therefore, this data reflects a number of categories that come under one heading.
- 8.10 There are several functions within MDH that received no complaints in 2024-25, these include services, such as voids, nuisance and emergency repairs.
- 8.11 Further performance information data is provided in more detail in Annex E as required under the Code.

#### **Overall trend**

- 8.12 MDH stage 1 complaint numbers decreased from 219 in 2023-24 to 210 in 2024-25 and equates to 75 complaints per 1,000 properties. Nationally, complaints have continued to increase across the entire social housing sector

driven by the regulatory changes and new Code alongside an increase in the national profile of the HOS in particular, with an expectation these will continue to rise.

Despite, MDH seeing fewer complaints than the previous year, this does not give a true reflection of the number of complaints received by MDH as often there are multiple complaints within one complaint raised. Furthermore, MDH have seen an increase in complex complaints which take longer to investigate to their complexity.

Nonetheless, whilst any complaint is arguably one too many at the same time these complaints reflect a very small proportion of the tens of thousands of actions, touchpoints, advice, service requests and interventions that MDH have provided to our tenants across the year.

### **Quarterly meetings**

8.13 In accordance with the HOS Code, during 2024-25, MDH have met quarterly with the Member Responsible for Complaints (MRC), Cabinet Member for Housing, Assets & Property to discuss complaint handling data and any other relevant information listed under 8.14.

8.14 The HOS Code sets out the following criteria to show compliance with the Code:

As a minimum, the Member Responsible for Complaints (MRC) and the governing body (or equivalent) must receive:

- a. Regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;
- b. Regular reviews of issues and trends arising from complaint handling;
- c. Regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and
- d. Annual complaints performance and service improvement report.

## **9 Ombudsman Determinations**

9.1 The HOS provides landlord performance data for individual landlords with 5 or more cases determined each year. The data shows an expected correlation between the number of complaints received by the HOS and landlord size.

9.2 The landlord performance data provided by the HOS for the financial year 2024-25 will likely not be available until next year.

9.3 Nonetheless, Annex F shows an overview of MDH cases determined by the HOS and the outcomes during 2024-25. Some of these complaints were live and carried forward into 2024-25 from the previous year and will be included in the HOS performance report for 2024-25 in due course. The available, previous year performance report is summarised below.

## **Landlord Performance Report 2023-24**

- 9.4 The HOS issued MDH's Landlord Performance Report for 2023-24 on 7 November 2024 (the HOS reports on the previous financial year). Overall, the report showed that although there had been a number of failures, MDH have performed well when compared to similar landlords by size and type.

Performance at a glance, the HOS made:

- 5 Determinations
- 8 Findings
- 3 Maladministration Findings
- 6 Orders
- 1 recommendation
- 0 Complaint Handling failure Orders

In addition they:

- Ordered MDH to pay £1375.00 in compensation

- 9.5 The overall maladministration rate for MDH was 43%, significantly lower than the national maladministration rate of 73%. Within their report, the HOS said that MDH had performed well when compared to similar landlords by size and type. This must also be set against the overall number of complaints which exceed 200 for both 2023-24 and 2024-25 however only a very small proportion move to HOS for review and determination as set out above.
- 9.6 A full report by the HOS on MDH's Landlord Report for 2023-24 is provided in more detail in Annex G.

## **Cases escalated to the HOS and LGSCO 2024-25**

- 9.7 During 2024-25, we have seen 11 complaints escalated to the HOS and 3 complaint escalated to the LGSCO. This is an uplift from the previous year and may be reflective of the concerted drive to promote the overall complaints process and Ombudsman role both nationally and locally.
- 9.8 Out of the 11 complaints escalated to the HOS, 2 complaints were raised in 2024-25, 5 were raised in 2023-24 and 4 raised in 2022/23. However, of these 11 complaints, the HOS have determined 7 complaints and 4 complaints are awaiting investigations by the HOS. These determinations will not be expected until later in 2025.
- 9.9 During the past couple of years, the HOS has recruited a high volume of staff to investigate complaints. As a result of this, going forward, we should expect complaints escalated to the HOS to be investigated and resolved quicker.
- 9.10 Of the HOS cases for 2024-25 determined to date, this resulted in 4 determinations of maladministration, 1 service failure and 9 no maladministration or no service failure identified. MDH were ordered to pay £1040.00 in compensation. The LGSCO determined 3 cases in which they declined to not open up a full investigation (see Annex F for full details).

- 9.11 To make a comparison with figures shown for 2024-25, in 2023-24, we received 5 determinations from the HOS of which 1 HOS case was refused as the complaint did not come under their remit and 1 LGSCO case was refused and appropriate advice was provided to the resident to pursue their case through the court.
- 9.12 It can take up to a year for MDH to receive the outcome of any complaints escalated to the HOS or the LGSCO for non-housing matters. Therefore, we can only report the outcome of Ombudsman complaints where we have been provided with a determination to date.
- 9.13 The MDH specific Ombudsman determination data is provided in more detail in Annex F.
- 9.14 In response to HOS determinations, those cases where an outcome of maladministration or severe maladministration was identified, landlords will be held to account. Therefore MDH will be publicly named as a landlord that mishandled how they dealt with a formal complaint. In response to this, MDH have complied with any Orders made by the HOS and apologised to the tenants for their mishandling of their case.

#### **Comparison of complaint determinations between MDH and HOS/LGSCO for the financial year 2024-25**

- 9.15 During 2024-25, the HOS has determined 7 MDH complaints. A comparison of complaint determinations between MDH and the HOS showed that out of these 7 determinations, the outcome of 4 determinations to be the same result that was made by MDH when we concluded our staged 2 investigations.

This shows that both MDH and the HOS have a mutual understanding and similar perspective of the complaint to reach the same shared decision and outcome. Whilst 3 HOS determinations showed that they only partially agreed with MDH conclusion of stage 2 investigations. This showed that although the HOS had highlighted some additional failures, these failures were only minor and this provided MDH an opportunity to learn from any failures and move forward service improvement.

- 9.16 During 2024-25, MDH have fared well, seeing no determinations made by the HOS resulting in severe maladministration.
- 9.17 During 2024-25, the LGSCO have determined 3 MDH complaints. A comparison of complaints between MDH and the LGSCO showed that out of these 3 determinations, the LGSCO made their final decisions, that they would not pursue these complaints any further.

## **10 General updates**

### **Additional resources**



- 10.1 During 2024-25, MDH recruited an additional Complaints Officer to support our complaint handling functions. A positive consequence of this is that we will be able to drive complaint handling forward in our ability to listen and understand our resident's concerns with greater insight into collective learning in order to continue to improve how we do things.

### **Remedies and service improvement process**

- 10.2 The HOS encourages landlords to have their own policy or guidance which explains the landlords approach to offering financial remedies.
- 10.3 MDH's Tenant Compensation Policy applies to tenants and residents of MDH. It covers both discretionary compensation which relates to loss, damage or inconvenience due to a service failure and statutory (obligatory) compensation. Each case is considered on its individual merit and discretion and we look to identify if the tenant or resident has been impacted negatively by our lack of actions. We consider the following when offering some form of compensation or good will gesture:
- Out of pocket expenses
  - Distress and upset
  - Inconvenience caused
  - Overall service failure
- 10.4 Not all service failures result in an offer of compensation, as a simple apology is often suffice.
- 10.5 During 2024-25, MDH have offered £16,672.78 compensation of which £12,906.28 has been accepted and £634.00 good will gestures have been offered of which £584.00 has been accepted.
- 10.6 Compared to the financial year 2023-24, MDH offered £10,327.93 compensation of which £6692.93 was accepted and £419.66 good will gestures was offered of which £369.66 was accepted.
- 10.7 The difference between the amount of compensation or good will gesture offered to the amount that was accepted will depend on individual tenants/residents cases. Not all tenants/residents are seeking some form of financial redress but a simple apology or a repair is resolved is suffice.
- 10.8 This financial year we have seen an increase in compensation and good will gestures compared to the previous financial year. This is a result of the HOS putting a greater emphasis on landlords to offer some form of compensation or good will gesture when a service failure has been identified.
- 10.9 Whether a complaint is resolved at Stage 1, 2 or at the HOS stage, all complaints types are logged and reviewed on a rolling monthly basis with a focus on both live complaints and upheld decisions as part of a senior management performance meeting. This looks at complaints information in the context of wider service/functional level performance data for each area of MDH and enable contextual discussions and actions to be agreed to address on-off

and more thematic issues and avoid any structural failings. This is further discussed with the Member Responsible for Complaints (MRC), Cabinet Member for Housing, Assets & Property.

- 10.10 There are further monthly meetings between the complaints officers and the Head of Housing Health to discuss any emerging trends, assess HOS determinations in detail and confirm lesson learnt, which are captured and fed back to relevant functional leads to action. This work also links into service policy and strategy development in order to ensure any longer-term, potentially broader changes to how we operate are actioned.

### **New CRM system**

- 10.11 During 2024-25 (August 2024), Mid Devon District Council (MDDC) implemented a new CRM system to log feedback such as complaints, compliments and comments. This new system is used across all services of the Council including MDH.

## **11 Recommendation**

- 11.1 That Members note the report and annexes.

### **Financial Implications**

The activity of Mid Devon Housing (MDH) is funded through the Housing Revenue Account (HRA). The HRA is ring fenced and subject to specific financial controls. The Housing Ombudsman Service (HOS) charges a mandatory membership fee based on the number of homes in the management of the Registered Provider (RP).

### **Legal Implications**

The tenancy agreement defines MDH's relationship with tenants and sets out the rights and responsibilities of both parties. This takes account of legal and regulatory requirements.

The Council is a registered provider of social housing and therefore is required to comply with the regulatory framework operated by the Regulator for Social Housing (RSH). The regulatory framework has been reviewed. The Transparency, Influencing and Accountability Standard contains provisions relating to the management of complaints.

There is also a requirement for MDH to manage complaints in accordance with the Complaints Handling Code (the Code) which is issued by the Housing Ombudsman Service (HOS). Landlords are expected to self-assess against the Code. Furthermore, landlords are required to use the learning from complaints to drive service improvement.

### **Risk Assessment**

The Complaint Handling Code provides a framework which supports effective complaint handling and prevention alongside learning and development. The Code

ensures complaint handling data is being used consistently across landlord functions, promotes engagement and sets out expectations for boards or equivalent governance, senior executives and frontline staff. Landlords have an obligation to comply with the Code. The Code contains guidance and is designed to assist landlords with responding to complaints effectively and fairly.

### **Impact on Climate Change**

None directly arising from this report.

### **Equalities Impact Assessment**

MDH has a collection of housing related policies. The use of these helps to ensure that service delivery is consistent and fair. These have been reviewed with the aim of aligning them more closely with the Regulatory Standards. There is a regulatory requirement for registered providers of social housing to tailor their services to meet the needs of tenants. MDH requests diversity data from tenants to enable compliance to be monitored.

MDH is required to work with people from all sections of society and having an agreed policy ensures that all tenants and other stakeholders are treated in the same way with adjustments being made to meet their needs, as necessary. The Code requires landlords to have an awareness of accessibility so residents can easily be able to access the complaints procedure via several routes.

### **Relationship to Corporate Plan**

The Corporate Plan 2024-28 sets out how the Council will deliver new affordable and social homes annually, improving and maintaining the existing stock to the highest standards

## **Section 3 – Statutory Officer sign-off/mandatory checks**

**Statutory Officer:** Andrew Jarrett

Agreed by or on behalf of the Section 151

**Date:** 22 May 2025

**Statutory Officer:** Maria de Leburne

Agreed on behalf of the Monitoring Officer

**Date:** 22 May 2025

**Chief Officer:** Richard Marsh

Agreed by or on behalf of the Chief Executive/Corporate Director

**Date:** 22 May 2025

**Performance and risk:** Stephen Walford

Agreed by the Chief Executive

**Date:** 22 May 2025

**Cabinet member notified:** Yes

## **Section 4 - Contact Details and Background Papers**

**Contact:** Mr Simon Newcombe, Head of Housing & Health

Email: [snewcombe@middevon.gov.uk](mailto:snewcombe@middevon.gov.uk)

Telephone: 01884 255255

### **Background papers:**

**The Regulatory framework for social housing:**

<https://www.gov.uk/guidance/regulator-of-social-housing-and-housing-ombudsman-service-factsheet>

**Complaint handling code**

<https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/>

**The Council's current policy and procedures relating to complaints and feedback:**

<https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/>

**Dispute resolution principle: Learn from outcomes**

<https://www.housing-ombudsman.org.uk/landlords-info/principles-dispute-resolution/dispute-resolution-principle-learn-from-outcomes/>

**Principles of Dispute Resolution**

<https://www.housing-ombudsman.org.uk/landlords-info/principles-dispute-resolution/>

**Early resolution**

<https://www.housing-ombudsman.org.uk/useful-tools/fact-sheets/early-resolution/>

**Tenant Satisfaction Measures**

[https://assets.publishing.service.gov.uk/media/660560a691a320001a82b1ae/20240325\\_TSM\\_FAQs\\_FINAL\\_-\\_April\\_2024\\_Revisions.pdf](https://assets.publishing.service.gov.uk/media/660560a691a320001a82b1ae/20240325_TSM_FAQs_FINAL_-_April_2024_Revisions.pdf)

**The Memorandum of Understanding**

Memorandum of Understanding between Regulator of Social Housing and the Housing Ombudsman - GOV.UK

**HOS Insight Reports**

Spotlight reports | Housing Ombudsman

**Temporary moves**

Decant expectations - Housing Ombudsman

**HOS Good practice**

New power to issue Good Practice | Housing Ombudsman

**HOS and LGSCO joint working procedures**

Joint working procedure with LGSCO | Housing Ombudsman

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## Annex A

### **MDH is performing against the Regulator's Tenancy Satisfaction Measures relating to complaints 2024-25**

#### **CH01: Complaints relative to the size of the landlord**

##### **Measured by: landlords' management information**

**This measure will be based on the number of complaints the landlord receives for each 1,000 homes they own.**

75 complaints – This is based on 212 stage 1 and 2 complaints with a housing stock of 2840.

#### **CH02: Complaints responded to within Complaint Handling Code timescales**

##### **Measured by: landlords' management information**

**This measure will be based on the percentage of complaints the landlord responds to within the times set by the Housing Ombudsman's Complaint Handling Code. All social housing landlords have to follow this Code.**

185 of stage 1 complaints received in 2024/25

180 (98.90%) of these complaints were responded on time

27 of stage 2 complaints received in 2024/25

27 (100%) of these complaints were responded on time.

Note: The above figures will differ, as at the time of reporting, there were complaints pending investigations. In addition, we may see an increase of complaints escalated to stage 2 over the next year. The above figures only show complaints that come under the remit of the Regulator's Tenancy Satisfaction Measures and do not include non housing ombudsman complaints.

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## **Annex B**

### **Tenant Satisfaction Perception Survey results relating to Complaints 2024-25**

#### **Effective handling of complaints**

##### **TP09: Satisfaction with the landlord's approach to handling of complaints**

Measured by: tenant perception survey

All tenant perception surveys must include this question:

- Have you made a complaint to your landlord in the last 12 months?
- If yes, how satisfied or dissatisfied are you with your landlord's approach to complaints handling?

This measure is based on the percentage of tenants who said they were satisfied.

Quarter 1 – MDH were too late to collect for Quarter 1, however, this data has been combined into Quarters 2, 3 and 4.

Quarter 2 - 33%

Quarter 3 – 45%

Quarter 4 – 33%

**Overall satisfaction 37%**

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## **Annex C**

### **MDH's self-assessment against the HOS Complaint Handling Code**

#### **Appendix A: Self-assessment form**

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i></p>	Yes	<p>The definition used by the Council, in the Mid Devon District Council's (MDDC) Complaints and Feedback Policy, as published online and can be found at:  <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/</a></p> <p>MDH uses the Housing Ombudsman Service (HOS) definition of a complaint on their housing webpages at:  <a href="https://www.middevon.gov.uk/residents/housing/mid-devon-housing/">https://www.middevon.gov.uk/residents/housing/mid-devon-housing/</a></p>	The corporate Complaints and Feedback Policy was amended in 2024-25 to take into account recommendations made by the HOS.

1.3	<p>A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.</p>	Yes	<p>MDH provides the resident the option to raise a formal complaint.</p> <p>All complaints will be dealt with in accordance with MDDC Complaints and Feedback Policy as published online and can be found at: <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/</a></p>	<p>Guidance is available for MDH staff and Contractors working on MDH's behalf. This is available on MDH's webpages: <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/</a></p>

1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service	Yes	<p>In line with MDDC's policy relating to Complaints and Feedback, the Council will not treat an initial request for a service to be delivered as a complaint.</p> <p>All service requests will be dealt with in accordance with MDDC Complaints and Feedback Policy as published online and can be found at:  <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/</a></p> <p>Examples of Service Requests are available on the housing webpage at:</p>	The corporate Complaints and Feedback Policy was amended in 2024-25 to take into account recommendations made by the HOS.

	requests are not complaints, but must be recorded, monitored and reviewed regularly.		<a href="https://www.middevon.gov.uk/residents/housing/mid-devon-housing/">https://www.middevon.gov.uk/residents/housing/mid-devon-housing/</a>  MDH provides an online facility for residents to log a Service Request direct themselves. Alternatively, staff will log any request on a resident's behalf.	
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must	Yes	All complaints will be dealt with in accordance with MDDC Complaints and Feedback Policy as published online and can be found at: <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/</a>  MDH have raised awareness amongst their staff that they must not stop their efforts to address a service request if the matter has been escalated to a formal complaint.	Guidance is available for MDH staff and Contractors working on MDH's behalf. This is available on MDH's webpages: <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/</a>

	not stop their efforts to address the service request if the resident complains.		MDH provides an online facility for residents to log a Service Request direct themselves. Alternatively, staff will log any request on a resident's behalf.	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback	Yes	<p>MDH send out a range of tenant satisfaction surveys. Each survey response provides clear information on how the person completing the survey can make or escalate their complaint.</p> <p>In accordance with the Regulator of Social Housing requirements, MDH sends out quarterly surveys to tenants to measure Tenant Satisfaction Measures (TSM's). This information is submitted yearly to the Regulator.</p> <p>A satisfaction survey is sent to a resident in email or paper format once a complaint has been closed.</p>	MDH have updated their surveys to reflect the HOS guidance



	about their services, they also must provide details of how residents can complain.			
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## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<p>All complaints will be dealt with in accordance with the Council's Complaints and Feedback Policy as published online and can be found at:</p> <p><a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/</a></p> <p>The MDDC Complaints and Feedback Policy states under</p>	

			<p>section 10 – Unreasonable, unreasonably persistent and vexatious complaints.</p> <p>The policy identifies situations and ways of responding where a complainant might be considered to be making complaints which are unreasonable, unreasonably persistent and vexatious.</p> <p>The policy contains explicit reference to this:  <b>“The policy is intended to assist in managing people by categorising them within these terms and agreeing the actions to be taken”.</b></p> <p>It also states that:  <b>“Officers and Members will endeavor to respond appropriately according to the individual complainant’s needs, and in compliance with our complaints policy, but this guidance is to cover occasions where nothing further can be reasonably done to assist or rectify a real or perceived problem.”</b></p>	
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			<p>The Complaints and Feedback Policy as published online and can be found at:  <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/</a></p>	
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	<p>All complaints will be dealt with in accordance with the Council's Complaints and Feedback Policy as published online and can be found at:  <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/</a></p> <p>The MDDC Complaints and Feedback Policy states under section 10 – Unreasonable, unreasonably persistent and vexatious complaints.</p> <p>The policy identifies situations and ways of responding where a complainant might be considered to be making complaints which are</p>	<p>The corporate Complaints and Feedback Policy was amended in 2024-25 to take into account recommendations made by the HOS.</p>

			<p>unreasonable, unreasonably persistent and vexatious.</p> <p>The policy contains explicit reference to this:  <b>“The policy is intended to assist in managing people by categorising them within these terms and agreeing the actions to be taken”.</b></p> <p>It also states that:  <b>“Officers and Members will endeavor to respond appropriately according to the individual complainant’s needs, and in compliance with our complaints policy, but this guidance is to cover occasions where nothing further can be reasonably done to assist or rectify a real or perceived problem.”</b></p>	
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	<p>MDH accepts complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds.</p> <p>MDH will use their discretion to accept complaints made outside</p>	

			this time limit where they have good reason to do so. These examples include complaints in regards to health & safety or safeguarding matters and/or conduct of staff matters.	
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Mid Devon Housing (MDH) uses a standard template letter which refers to the Complaints and Feedback Policy.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	MDH considers each complaint on its own merit. Where we have reason to not raise and accept a formal complaint, this will be in accordance with their Complaints and Feedback Policy.  The Complaints and Feedback Policy as published online and can be found at:	

			<a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/</a>	
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### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply : Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties	Yes	<p>The Complaints and Feedback Policy states under section 9 the following:</p> <p><b>9. Assistance for complainants</b> Complaints do not have to be in writing and can be made in whatever format is most suitable for the complainant; this can be by phone, email, writing a letter, using our online form or in person.</p> <p>Complaints can be made on behalf of customers who are unable to make the complaint themselves. Customer Services staff are available to help customers who are unsure what to do.</p> <p>Support can be provided for those who have difficulty reading or writing.</p>	<p>Guidance is available for MDH staff and Contractors working on MDH's behalf. This is available on MDH's webpages: <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/</a></p>

	<p>under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.</p>	<p>Information about the complaints procedure can be provided in an alternative format on request.</p> <p>Information is available on the Council's webpage at <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/</a></p> <p>MDH launched in February 2024 guidance to staff in flagging accounts. This enables staff to discuss ways that tenant's vulnerabilities can be mitigated and agree any reasonable adjustments that can be made to support them when accessing our services.</p> <p>MDH will raise an UDC account flag on their housing management system that alerts staff that a reasonable adjustment has been agreed with the tenant. The tenant is written to and their record is clearly marked that this has been done.</p> <p>MDH have commenced a rolling 2 year programme of gathering information about their tenant's profile through their "Getting to know you project". This will enable us to tailor our services to meet the needs of individual tenants.</p> <p>MDH Vulnerability Policy under section 10.5 provides information about reasonable adjustments to our complaints process.</p> <p>The Vulnerability Policy as published online and</p>	
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			<p>can be found at:  <a href="https://www.middevon.gov.uk/strategies-and-policies">Strategies and policies - MIDDEVON.GOV.UK</a></p> <p>The new corporate complaints system asks the question to the complainant if they have any vulnerabilities that they wish to share with us. This enables to adapt our service accordingly.</p>	
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate	Yes	<p>MDH offers a wide range of different ways to raise a complaint. Information is available on the Housing webpage at:  <a href="https://www.middevon.gov.uk/residents/housing/mid-devon-housing/">https://www.middevon.gov.uk/residents/housing/mid-devon-housing/</a></p> <p>Additional information is available on the Council's webpages below:</p> <p>The Complaints and Feedback Policy states under section 9 the following:</p> <p><b>9. Assistance for complainants</b>  Complaints do not have to be in writing and can be made in whatever format is most suitable for the complainant; this can be by phone, email, writing a letter, using our online form, or in person.</p>	<p>The corporate Complaints and Feedback Policy was amended in 2024-25 to take into account recommendations made by the HOS.</p> <p>Guidance is available for MDH staff and Contractors working on MDH's behalf. This is available on MDH's webpages:  <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/</a></p>



	person within the landlord.		Information is available on the Council's webpage at <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/</a>	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised	Yes	MDH welcomes complaints as an opportunity to listen to residents' concerns and take appropriate action to improve services where failures have been identified.	

	and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.			
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for	Yes	<p>The Council's website is accessible. A copy of the Complaints and Feedback Policy is available online and in paper format if requested.</p> <p>Webpages include information about each stage of the complaints process.</p> <p>Information is available on the Council's webpage at <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/</a></p> <p>Information is available on the Housing webpage at: <a href="https://www.middevon.gov.uk/residents/housing/mid-devon-housing/">https://www.middevon.gov.uk/residents/housing/mid-devon-housing/</a></p>	The corporate Complaints and Feedback Policy was amended in 2024-25 to take into account recommendations made by the HOS.

	responding. The policy must also be published on the landlord's website.			
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code	Yes	<p>A copy of the Complaints and Feedback Policy provides information about the Housing Ombudsman and how to contact them.</p> <p>MDH webpages include information about the Ombudsman, Complaint Handling Code and a copy of the self-assessment form.</p> <p>Information is available on the Housing webpage at:  <a href="https://www.middevon.gov.uk/residents/housing/mid-devon-housing/">https://www.middevon.gov.uk/residents/housing/mid-devon-housing/</a> </p>	The corporate Complaints and Feedback Policy was amended in 2024-25 to take into account recommendations made by the HOS.

3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	MDH will provide residents the opportunity to have a representative e.g Friend, family, advocate, councillor or MP to deal with their complaint on their behalf including attendance at meetings. MDH will sought authorisation from the complainant in the first instance.	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage	Yes	<p>Information is available on the Council's webpage at <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/</a></p> <p>Information is available on the Housing webpage at: <a href="https://www.middevon.gov.uk/residents/housing/mid-devon-housing/">https://www.middevon.gov.uk/residents/housing/mid-devon-housing/</a></p>	

	with the Ombudsman about their complaint.		Information about engaging with the Housing Ombudsman is included in complaint communications eg emails, letters.	
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#### Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<p>MDH have 2 x Complaints Officers in post. They are suitably qualified and meet the requirements of the job specification and description for the job role.</p> <p>MDH recruited an additional Complaints Officer in January 2025 to ensure that we remain compliant with the Housing Ombudsman Service Complaint Handling Code.</p>	

4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The Complaints Officers have access to housing records, online filing systems, housing management system and staff at all levels. They have the authority and autonomy to resolve disputes promptly and fairly.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	<p>As part of new staff inductions, they are given the opportunity to shadow the Complaints Officer to learn more about MDH's complaint handling.</p> <p>All staff are suitably trained in the importance of complaint handling.</p> <p>MDH recruited an additional Complaints Officer in January 2025 to ensure that we remain compliant with the Housing Ombudsman Service Complaint Handling Code.</p>	

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### Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply : Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	MDH deal with complaints in accordance with their corporate policy on complaint handling.  The Complaints and Feedback Policy as published online and can be found at: <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/</a>	The corporate Complaints and Feedback Policy was amended in 2024-25 to take into account recommendations made by the HOS.



5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	MDH has a two stage approach before a complainant has exhausted the Council's internal complaints process.	

5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	MDH only has two stages within their complaints process.	Guidance is available for MDH staff and Contractors working on MDH's behalf. This is available on MDH's webpages: <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/</a>
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must	Yes	MDH only has two stages within their complaints process. Complaints made about contractors working on behalf of MDH will be expected to go through the Council's internal complaints process	Guidance is available for MDH staff and Contractors working on MDH's behalf. This is available on MDH's webpages: <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/</a>

	not be expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	MDH only has two stages within their complaints process. Complaints made about contractors working on behalf of MDH will be expected to go through the Council's internal complaints process	Guidance is available for MDH staff and Contractors working on MDH's behalf. This is available on MDH's webpages: <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/</a>
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is	Yes	MDH uses a standard template which highlights the tenant's complaint and how they would like to resolve the complaint.	

	seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.			
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	MDH uses a standard template which highlights the tenant’s complaint and how they would like to resolve the complaint. Any complaints that do not come under MDH’s remit, the complainant will be informed.	
5.8	At each stage of the complaints process,	Yes	MDH will investigate complaints in a fair and reasonable manner.	

	<p>complaint handlers must:</p> <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest;</li> <li>and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>			
5.9	Where a response to a	Yes	MDH standard letters explains that should there be a delay in responding to their	

	complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.		<p>complaint, they will keep the complainant updated.</p> <p>Information is also provided with standard letters/emails about the Housing Ombudsman Service, should they wish to raise any matters with them direct.</p>	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities	Yes	<p>The Complaints and Feedback Policy states under section 9 the following:</p> <p><b>9. Assistance for complainants</b></p> <p>Complaints do not have to be in writing and can be made in whatever format is most suitable for the complainant; this can be by phone, email, writing a letter, using our online form, or in person.</p> <p>Complaints can be made on behalf of customers who are unable to make the complaint themselves. Customer Services staff are available to help customers who are unsure what to do.</p>	<p>Guidance is available for MDH staff and Contractors working on MDH's behalf. This is available on MDH's webpages: <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/</a></p>

	<p>a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.</p>	<p>Support can be provided for those who have difficulty reading or writing.</p> <p>Information about the complaints procedure can be provided in an alternative format on request.</p> <p>Information is available on the Council's webpage at <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/</a></p> <p>MDH launched in 2024-25 guidance to staff in flagging accounts. This enables staff to discuss ways that tenant's vulnerabilities can be mitigated and agree any reasonable adjustments that can be made to support them when accessing our services.</p> <p>MDH will raise an UDC account flag on their housing management system that alerts staff that a reasonable adjustment has been agreed with the tenant. The tenant is written to and their record is clearly marked that this has been done. This will be reviewed.</p> <p>MDH have commenced a rolling 2 year programme of gathering information about their tenant's profile through their "Getting to know you project". This will enable us to</p>	
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			<p>tailor our services to meet the needs of individual tenants.</p> <p>MDH Vulnerability Policy under section 10.5 provides information about reasonable adjustments to our complaints process. The Vulnerability Policy as published online and can be found at:  <a href="#">Strategies and policies - MIDDEVON.GOV.UK</a></p> <p>The new corporate complaints system asks the question to the complainant if they have any vulnerabilities that they wish to share with us. This enables to adapt our service accordingly.</p>	
5.11	<p>Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so.</p> <p>Landlords must clearly set out these reasons, and they must comply with the</p>	Yes	<p>Complaint investigations will be dealt with in accordance with the Council's Complaints and Feedback Policy.</p> <p>The Complaints and Feedback Policy as published online and can be found at:  <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/how-our-complaints-procedure-works/</a></p>	



	provisions set out in section 2 of this Code.			
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation	Yes	MDH have secure files in an electronic document management system where this data is stored.	

	such as reports or surveys.			
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	<p>MDH have in place remedies to resolve a complaint at any stage of the complaints process.</p> <p>MDH's Compensation Policy explains the different remedies available to resolve a complaint. This policy was updated in 2024.</p> <p>A copy of MDH's Compensation Policy is available online at: <a href="#">Strategies and policies - MIDDEVON.GOV.UK</a></p>	
5.14	Landlords must have policies and procedures	Yes	The MDDC Complaints and Feedback Policy states under sections 10 and 11 how to deal with unreasonable, unreasonably	

	in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.		<p>persistent and vexatious complaints.</p> <p>Information is available on the Council's webpage at <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/</a></p> <p>In addition, MDH have an Unacceptable Behaviour Procedure in place.</p> <p>This procedure explains how we will approach unacceptable behaviours. The procedure applies to all areas of our work and to all methods of contact including telephone, face-to-face, letters, emails, social media and other digital channels.</p> <p>Information is available on the Council's webpages at: <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/procedures-policies-and-strategies/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/procedures-policies-and-strategies/</a></p>	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be	Yes	The MDDC Complaints and Feedback Policy states under sections 10 and 11 how to deal with unreasonable, unreasonably persistent and vexatious complaints.	

	<p>proportionate and demonstrate regard for the provisions of the Equality Act 2010.</p>		<p>Information is available on the Council's webpage at <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/</a></p> <p>MDH will comply with the Public Sector Equality Duty when placing any restrictions on contact due to unacceptable behaviour.</p> <p>In addition, MDH have an Unacceptable Behaviour Procedure in place.</p> <p>This procedure explains how we will approach unacceptable behaviours. The procedure applies to all areas of our work and to all methods of contact including telephone, face-to-face, letters, emails, social media and other digital channels.</p> <p>Information is available on the Council's webpages at: <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/procedures-policies-and-strategies/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/procedures-policies-and-strategies/</a></p>	
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## Section 6: Complaint Stages

### Stage 1

Code provision	Code requirement	Comply : Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most	Yes	<p>Complaints will be dealt with in accordance with the requirements of the Housing Ombudsman Complaint Handling Code.</p> <p>Complaints will also be dealt with in accordance with MDH's policies and procedures. Copies of all MDH's policies is available online at: <a href="#">Strategies and policies - MIDDEVON.GOV.UK</a></p> <p>MDH's housing management systems are checked prior to complaint investigations to identify any tenant's vulnerabilities and to check if any reasonable adjustments need to be made to enable the tenant to access MDH's services.</p>	

	stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.			
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	<p>All complaints will be acknowledged within 5 working days and resolved within 10 working days where possible (Stage 1).</p> <p>Information is available on the Council's webpage at <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/</a></p> <p>Additional Information is available on the Housing webpage at: <a href="https://www.middevon.gov.uk/residents/housing/mid-devon-housing/">https://www.middevon.gov.uk/residents/housing/mid-devon-housing/</a></p> <p>MDH acknowledgement letter provides details of when the tenant can expect a response to their complaint.</p>	The corporate Complaints and Feedback Policy was amended in 2024-25 to take into account recommendations made by the HOS.
6.3	Landlords must issue a full response	Yes	All complaints will be responded within 10 working days except where there is a good reason to extend the deadline.	

	to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.		<p>Information is available on the Council's webpage at <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/</a></p> <p>Additional Information is available on the Housing webpage at: <a href="https://www.middevon.gov.uk/residents/housing/mid-devon-housing/">https://www.middevon.gov.uk/residents/housing/mid-devon-housing/</a></p>	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for	Yes	MDH will only extend complaint deadlines where it is deemed necessary. The complainant will be kept informed via letter or email advising of the delay and will be provided with a new deadline date when a response can be expected.	Guidance is available for MDH staff and Contractors working on MDH's behalf. This is available on MDH's webpages: <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/</a>

	response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.			
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	MDH extension letter/email provides details of how to contact the Housing Ombudsman Service.	
6.6	A complaint response must be provided to the resident when the answer to the complaint is	Yes	Once a stage 1 or stage 2 response has been provided. Where lessons learnt and follow up actions are arising from the complaint. These are passed to the relevant Team/member of staff to follow up and keep the complainant updated. They are expected to provide an update to the	Guidance is available for MDH staff and Contractors working on MDH's behalf. This is available on MDH's webpages: <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/</a>



	known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		Complaints Officer when the lessons learnt have been actioned by a set timeline.	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	MDH refer residents to the relevant policy, procedure, legislative requirements, statutory obligations and good practice where appropriate to do so.	

6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a	Yes	MDH will incorporate any new complaints within the original complaint where it deems appropriate to do so. Where this is not the case, a new complaint will be raised and responded to in accordance with our Complaints and Feedback Policy.	
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	new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to</li> </ul>	Yes	The relevant information is provided in the Stage 1 response letter.	

	put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			
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### Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	MDH only has two stages within their complaints process.	

6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	<p>All complaints will be acknowledged within 5 working days and resolved within 10 working days where possible (Stage 1).</p> <p>Information is available on the Council's webpage at <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/</a></p> <p>Additional Information is available on the Housing webpage at: <a href="https://www.middevon.gov.uk/residents/housing/mid-devon-housing/">https://www.middevon.gov.uk/residents/housing/mid-devon-housing/</a></p> <p>MDH acknowledgement letter provides details of when the tenant can expect a response to their complaint.</p>	The corporate Complaints and Feedback Policy was amended in 2024-25 to take into account recommendations made by the HOS.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident	Yes	At MDH's stage 1 response letter, the complainant is asked to provide an explanation why they remain dissatisfied with the outcome of their complaint. However, they are not obliged to provide this information. This information is to help to understand why the complainant remains dissatisfied. MDH will make reasonable efforts to	

	remains unhappy as part of its stage 2 response.		understand why the complainant remains dissatisfied.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Any complaints escalated to stage 2 will be investigated by a member of staff not involved in the original stage 1 complaint investigations.	
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	<p>All complaints will be responded within 10 working days except where there is a good reason to extend the deadline.</p> <p>Information is available on the Council's webpage at <a href="https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/">https://www.middevon.gov.uk/your-council/customer-services/customer-feedback-and-complaints/</a></p>	

			Additional Information is available on the Housing webpage at: <a href="https://www.middevon.gov.uk/residents/housing/mid-devon-housing/">https://www.middevon.gov.uk/residents/housing/mid-devon-housing/</a>	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	MDH will only extend complaint deadlines where it is deemed necessary. The complainant will be kept informed via letter or email advising of the delay and will be provided with a new deadline date when a response can be expected.	
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	MDH extension letter/email provides details of how to contact the Housing Ombudsman Service	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to	Yes	Once a stage 1 or stage 2 response has been provided. Where lessons learnt and follow up actions are arising from the complaint. These are passed to the relevant Team/member of staff to follow up and keep the complainant updated. They are expected to provide an update to the Complaints	

	address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		Officer when the lessons learnt have been actioned by a set timeline.	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	MDH refer to tenants to the relevant policy, procedure, legislative requirements, statutory obligations and good practice where appropriate to do so.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right;	Yes	The relevant information is provided in the Stage 2 response letter.	



	f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Any complaints escalated to stage 2 will be investigated by a member of staff not involved in the original stage 1 complaint investigations.	

### Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> </ul>	Yes	The relevant information is provided in the Stage 1 or 2 response letter.	

	<ul style="list-style-type: none"> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Any remedy offered is in accordance with the Tenant Compensation Policy. This policy is available to view on the Council's website and was updated in 2024. This can be found at: <a href="https://www.middevon.gov.uk/residents/housing/council-housing/strategies-and-policies/">https://www.middevon.gov.uk/residents/housing/council-housing/strategies-and-policies/</a>	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	MDH provides clear information to the complainant about the remedy made and by when, where applicable.	

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	MDH take into account good practice and guidance provided by the Housing Ombudsman Service when setting out a remedy.	

## Section 8: Putting things right Section

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's</li> </ul>	Yes	<p>A Complaints Handling report is produced yearly to the Homes Policy Development Group.</p> <p>A copy of this report and supporting documents are available on our housing webpages at:  <a href="https://www.middevon.gov.uk/residents/housing/mid-devon-housing/">https://www.middevon.gov.uk/residents/housing/mid-devon-housing/</a></p> <p>MDH meet quarterly with the Member Responsible for Complaint Handling to discuss complaint handling data and performance.</p>	

	performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	<p>A Complaints Handling report is produced yearly to the Homes Policy Development Group.</p> <p>A copy of this report and supporting documents are available on our housing webpages at:  <a href="https://www.middevon.gov.uk/residents/housing/mid-devon-housing/">https://www.middevon.gov.uk/residents/housing/mid-devon-housing/</a></p>	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Mid Devon Housing are currently undergoing a restructure in 2025, this self-assessment has taken into account the proposed restructure.	
8.4	Landlords may be asked to review and update the self-	Yes	MDH will comply with any requirements made by the Housing Ombudsman Service following investigations.	

	assessment following an Ombudsman investigation.			
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	<p>In the event that MDH is not able to comply with the Code due to exceptional circumstances they will comply with the requirements stipulated by the Housing Ombudsman Service.</p> <p>MDH will also inform the Regulator for Social Housing of any major incidents that may impact our residents.</p>	

### Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	MDH see complaint handling as an opportunity to learn from mistakes and implement service improvement as a result of any failure.  Recommendations will be highlighted in the lessons learnt of a complaint.	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	MDH see complaint handling as an opportunity to learn from mistakes and implement service improvement as a result of any failure.	
9.3	Accountability and transparency are also integral to a positive complaint	Yes	A Complaints Handling report is produced yearly to the Homes Policy	

	handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.		<p>Development Group. This report includes examples of lessons learnt from complaint handling.</p> <p>MDH use their social media pages to promote lessons learnt where we have made improvements following a complaint. In addition, MDH update their webpages on a regular basis to highlight the "Improvements we have made".</p> <p>These improvements are available to view on our housing webpages online at: <a href="#">Complaints and feedback - MIDDEVON.GOV.UK</a></p>	
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	<p>Monthly Complaint Meetings take place to discuss complaint handling data and performance between senior staff, managers and Complaints staff.</p> <p>Monthly Performance &amp; Risk Meetings take place to</p>	



			discuss complaint handling data and performance between senior staff and managers.	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	<p>MDH Cabinet holder for Housing is appointed and referred to as the Member Responsible for Complaints.</p> <p>MDH meet quarterly with the Member Responsible for Complaint Handling to discuss complaint handling data and performance.</p> <p>The MRC is kept informed of any major incidents impacting on our residents. The Complaints Officer will keep the MRC abreast of any relevant information e.g good practice, changes in policy or legislation.</p>	

9.6	<p>The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.</p>	Yes	<p>MDH Cabinet holder for Housing is appointed and referred to as the Member Responsible for Complaints.</p> <p>Information about complaint handling data is included in the Service Delivery Report for each quarter which is presented to the Homes Development Policy Group quarterly.</p> <p>A Complaints Handling report is produced yearly to the Homes Policy Development Group. This report includes examples of lessons learnt from complaint handling.</p>	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p>	Yes	<p>MDH Cabinet holder for Housing is appointed and referred to as the Member Responsible for Complaints.</p>	

	<p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>		<p>A Complaints Handling report is produced yearly to the Homes Policy Development Group. This report includes examples of lessons learnt from complaint handling</p> <p>Monthly Complaint Meetings take place to discuss complaint handling data and performance between senior staff, managers and Complaints staff.</p> <p>Monthly Performance &amp; Risk Meetings take place to discuss complaint handling data and performance between senior staff and managers.</p> <p>MDH meet quarterly with the Member Responsible for Complaint Handling to discuss complaint handling data and performance.</p> <p>Information about complaint handling data is included in</p>	
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			the Service Delivery Report for each quarter which is presented to the Homes Development Policy Group quarterly.	
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others;</li> <li>and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>	Yes	MDH includes standard objectives in their Housing Improvement Plan on complaint handling.	<p>Guidance is available for MDH staff and Contractors working on MDH's behalf. This is available on MDH's webpages: <a href="https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/">https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/complaints-and-feedback/</a></p>

## Annex D – Lessons Learnt

### (i) Lessons Learned relating to Complaints 2024-25

Background to service improvement	Lessons Learnt	Service improvement
To improve the information that MDH provides to residents in regards to their succession rights	To amend internal staff procedures in relation to succession rights. To clarify succession rights and under occupation within our Tenancy Management Policy	MDH's Procedures and Tenancy Management Policy have been updated.
To improve how staff process and review flexible tenancies	<p>To amend internal staff procedures in relation to flexible tenancies. This will ensure that the correct processes are followed.</p> <p>In addition, staff responsible for reviewing flexible tenancies will be given appropriate training.</p>	<p>Procedures will be updated.</p> <p>Staff provided with training.</p>
To improve information provided to tenants about providing a clear maintenance zone for when external works are required to a property	To review our MDH leaflets and handbooks to providing more clarity for tenants on using gardens/paths to ensure that they don't fall into a maintenance zone, therefore not placing anything that can't be easily be moved. This will ensure that any chance of damage to possessions is reduced	Working progress, MDH documents to be updated
To improve our complaint responses	To review the information we include within our complaint responses	Where applicable, we now try and provide a timeline of events within our complaint responses so that the resident has sight of any historical information that may be

		relevant to their complaint.
<p>To improve our knowledge of tenants vulnerabilities to help to tailor our services to meet their individual needs</p> <p>To have a clearer understanding how a tenants vulnerabilities may have been impacted as a result of a formal complaint made</p>	<p>To promote tenants to report any vulnerabilities so that we can tailor our services to meet their needs, to have a greater understanding on how their vulnerabilities impacts them and to allow us to make any reasonable adjustments</p>	<p>MDH will promote raising awareness through their social medial platform, newsletters and on the back of rent statements</p>
<p>To comply with recommendations by the Housing Ombudsman Service to improve how we manage permission requests.</p>	<p>To improve letter templates, procedures and update MDH's Improvements to Council Properties Policy</p>	<p>We set up a working group to look at procedures, letter templates and our policy relating to permission requests</p>
<p>To promote better record keeping and how we deal with security related repairs</p>	<p>To improve how we prioritise security related repairs, ensuring our records are kept up to date.</p>	<p>We will ensure that all security related repairs are prioritised and that records are accurately maintained for all reported issues</p>
<p>To promote better communications with our tenants</p>	<p>To improve how we communicate with our tenants in regards to scheduling specialised repair works</p>	<p>We will ensure that when specialised work is required, these works are scheduled promptly and the tenant is communicated with promptly to avoid delays</p>
<p>To support staff's knowledge on how to access information</p>	<p>To refresh our repairs operatives knowledge on how to quickly check our housing systems to check the asbestos database</p>	<p>Relevant staff have been given training on how to access asbestos information</p>
<p>To have a clearer process in regards to ending a tenancy on the Public Trustee</p>	<p>To improve communications between staff and representatives of a deceased tenant</p>	<p>MDH's Public Trustee processes have been updated</p>

To provide clearer information on how a resident can contact us in regards to their complaint	To improve how a resident can contact us.	MDH letter and email templates have been updated with easy information on how to contact us
To support a positive outcome to a complaint raised and improve tenant satisfaction	To improve tenant satisfaction	As soon as MDH had been made aware that a builder who had previously built one of our estates had gone into administration, we took prompt action to find an alternative contractor to deal with a leak at one of our properties which had originally come under the builder's warranty
To support a positive change to how we manage MDH's commercial units	To improve standards	We have implemented many changes from when we took over the management of the commercial units from another part of the Authority, with much clearer leases and regular condition surveys

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## Annex E

### (i) Performance relating to Complaints 2024-2025

The above data includes both Housing Ombudsman Service and non Housing Ombudsman complaints.

Total Received Complaints by Type	14	15	16	17	11	15	18	26	12	20	26	18	208
Allocations And Lettings	0	0	0	0	0	0	3	0	0	0	0	1	4
ASB	0	1	0	1	0	0	1	0	0	0	0	1	4
Damp And Mould	2	0	1	1	1	0	1	2	0	2	1	0	11
Disabled Adaptations	0	0	0	0	0	0	0	0	0	0	0	2	2
Emergency Repairs	0	0	0	0	0	0	0	0	0	0	0	0	0
Estate Management	0	2	0	1	0	0	0	0	1	0	0	1	5
Gas Safety	0	0	0	0	1	2	1	1	1	4	2	0	12
Non-Housing Ombudsman	3	3	3	2	1	1	2	3	2	2	1	2	25
Nuisance	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Planned Maintenance Contracts	0	2	3	2	4	0	3	3	2	2	4	3	28
Planned Maintenance	1	0	2	1	0	3	0	4	0	4	6	1	22
Rents And Charges	0	1	1	2	2	0	1	3	0	1	1	2	14
Routine Repairs	5	3	2	4	1	8	2	7	5	2	5	2	46
Staff/Conduct	2	2	0	3	0	0	3	1	1	3	1	1	17
Tenancy Management	1	1	4	0	1	1	1	2	0	0	5	2	18
Voids	0	0	0	0	0	0	0	0	0	0	0	0	0

## (ii) Complaints closed by category 2024-25

The above data includes both Housing Ombudsman Service and non Housing Ombudsman complaints.

Total Closed Complaints by Type	14	15	16	17	11	15	18	26	12	20	26	18	208
Allocations And Lettings	0	0	0	0	0	0	3	0	0	0	0	1	4
ASB	0	1	0	1	0	0	1	0	0	0	0	1	4
Damp And Mould	2	0	1	1	1	0	1	2	0	2	1	0	11
Disabled Adaptations	0	0	0	0	0	0	0	0	0	0	0	2	2
Emergency Repairs	0	0	0	0	0	0	0	0	0	0	0	0	0
Estate Management	0	2	0	1	0	0	0	0	1	0	0	1	5
Gas Safety	0	0	0	0	1	2	1	1	1	4	2	0	12
Non-Housing Ombudsman	3	3	3	2	1	1	2	3	2	2	1	2	25
Nuisance	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Planned Maintenance Contracts	0	2	3	2	4	0	3	3	2	2	4	3	28
Planned Maintenance	1	0	2	1	0	3	0	4	0	4	6	1	22
Rents And Charges	0	1	1	2	2	0	1	3	0	1	1	2	14
Routine Repairs	5	3	2	4	1	8	2	7	5	2	5	2	46
Staff/Conduct	2	2	0	3	0	0	3	1	1	3	1	1	17
Tenancy Management	1	1	4	0	1	1	1	2	0	0	5	2	18
Voids	0	0	0	0	0	0	0	0	0	0	0	0	0

## Complaint refusal

MDH have not refused any investigations into complaints during the financial year 2024/25.

## **Annex F – Ombudsman Determinations made during 2024-25**

### **Abbreviations:**

**HOS – Housing Ombudsman**

**LGSCO – Local Government & Social Care Ombudsman**

#### **MDCMS-5988 (HOS case)**

- There was no maladministration in the landlord's decision to recharge the tenant for repairs to the toilet in her home.
- There was no maladministration in the landlord's handling of repairs to the toilet.
- There was service failure in the landlord's complaint handling and communication with the tenant.
- MDH were ordered to pay £100.00 compensation in recognition of the failings in communication identified and a written apology to the tenant.

#### **MDCMS-5962 (HOS case)**

- There was no maladministration in the landlord's handling of reports of damp and mould at the tenant's property and her damaged belongings.
- There was maladministration in the landlord's handling of a leak at the tenant's property.
- MDH were ordered to pay £300.00 compensation for its handling of a leak at the residents property and a written apology to the tenant.

#### **MDCMS 5730 and 5900 (HOS case)**

- There was no maladministration by the landlord in its decision to issue the tenant with a notice to quit.
- The tenant's complaint about the landlord's handling of her personal data is outside of the Ombudsman's jurisdiction to investigate.
- There was service failure by the landlord in its complaints handling.
- MDH were ordered to pay the tenant £90.00 in compensation for the distress and inconvenience caused to her on account of its complaint handling failure.

#### **MDCMS – 6165 (HOS case)**

- There was maladministration in the landlord's handling of the tenant's concerns about the position of a fence at the bottom of their garden.
- There was no maladministration in the landlord's handling of the tenant's concerns about the height of a fence on the left-hand boundary of their property.
- There was maladministration in the landlord's complaint handling.
- MDH were ordered to pay £650.00 in compensation for the distress, inconvenience, time and trouble in pursuing the fence location and alleged encroachment to completion as well for complaint handling failures and delays. MDH were also ordered to provide a written apology to the tenant.

- MDH were ordered to take legal advice regarding the alleged encroachment of the fence onto the public right of way.
- The HOS also made a number of recommendations to review its processes and templates for providing permission for improvements and processes for completing post-inspection surveys. As a result of the recommendation made a working group was set up to review MDH's processes and policy.

#### **MDCMS- 6359 (HOS case)**

- There was no maladministration in the landlord's handling of the tenant's request for a fence to be installed around her garden.
- There was no maladministration in the landlord's handling of the condition of the tenant's garden and an overgrown tree.

#### **MDCMS – 6349 (HOS case)**

- There was no maladministration in relation to the landlord's decision with regards to the tenant's requests for replacement of the front door.
- The HOS recommended that we wrote to the tenant to confirm that we could either replace the door subject to a recharge or the tenant could replace the door himself subject to conditions set out by MDH. Also, for MDH to repeat our offer of installing a key safe. The tenant was written to in response to this recommendation.

#### **MDCMS 7156 – (HOS Case)**

- There was no maladministration in the landlord's handling of the resident's:
  - a. Reports of antisocial behaviour (ASB) and hate crimes.
  - b. Concerns about its failure to safeguard him and breach of his human rights and the Equality Act 2010.
  - c. Concerns about staff conduct.
  - d. Associated complaint.

#### **MDCMS – 6934 (LGSCO case)**

- The LGSCO would not investigate this case as there was not enough evidence of fault to justify an investigation.

#### **MDCMS – 6318 (LGSCO case)**

- The LGSCO would not investigate this case due to the owner occupier not bringing the complaint to the LGSCO within a year.

#### **FS-671902515 (LGSCO case)**

- The LGSCO would not investigate this case because it is about the management of social housing by the Council as a social landlord.

**Housing**  
Ombudsman Service

# **LANDLORD PERFORMANCE REPORT**

**2023/2024**

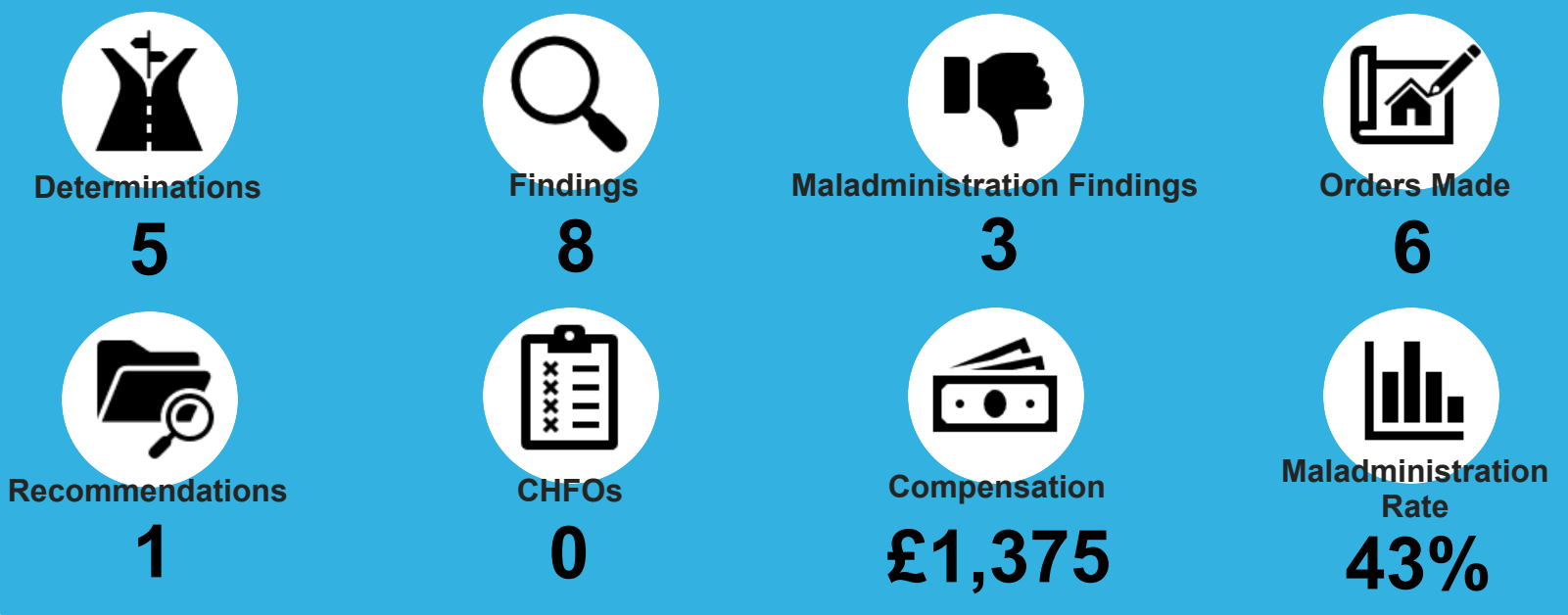
Mid Devon District Council

Mid Devon District Council

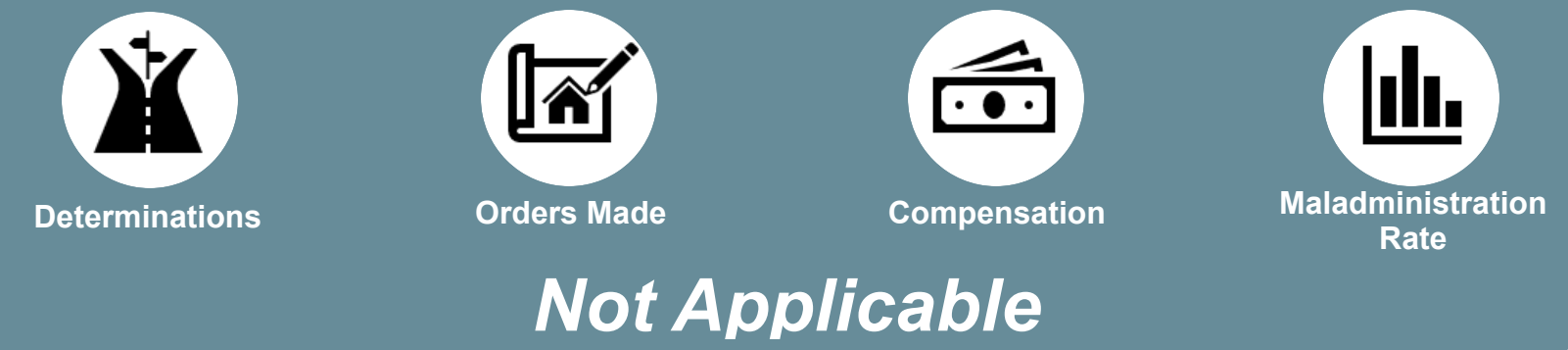
**Landlord:** Mid Devon District Council

**Landlord Homes:** 3,086      **Landlord Type:** Local Authority / ALMO or TMO

PERFORMANCE AT A GLANCE



PERFORMANCE 2022-2023

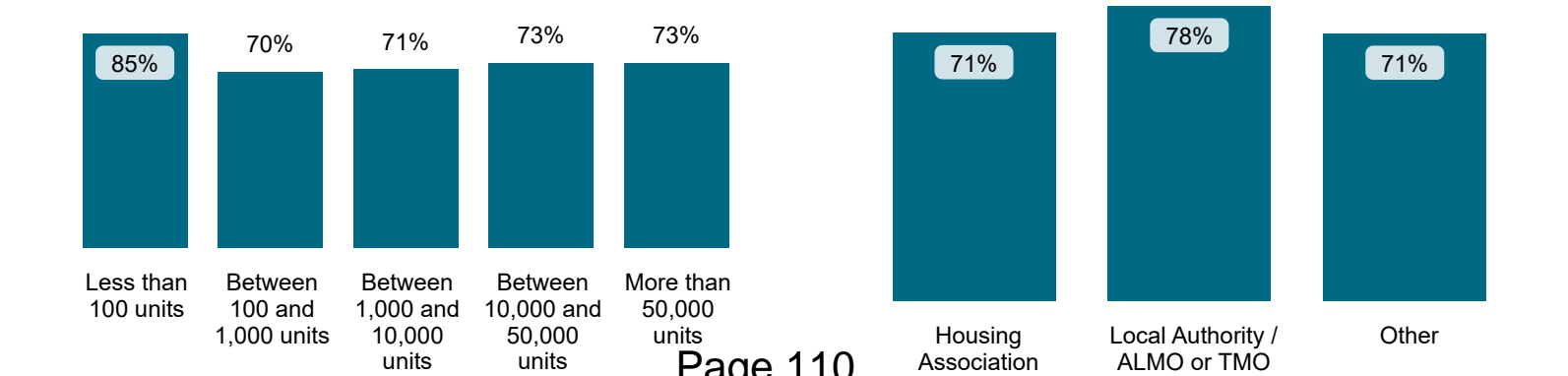


**Maladministration Rate Comparison** | Cases determined between April 2023 - March 2024

<b>NATIONAL MALADMINISTRATION RATE: 73%</b>	The landlord performed <u>well</u> when compared to similar landlords by size and type.
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National Mal Rate by Landlord Size: Table 1.1

by Landlord Type: Table 1.2



Findings Comparison | Cases determined between April 2023 - March 2024

National Performance by Landlord Size: Table 2.1

Outcome	Less than 100 units	Between 100 and 1,000 units	Between 1,000 and 10,000 units	Between 10,000 and 50,000 units	More than 50,000 units	Total	Mid Devon District Council	
							Outcome	% Findings
Severe Maladministration	14%	6%	4%	8%	7%	7%	Severe Maladministration	0%
Maladministration	35%	37%	41%	42%	43%	42%	Maladministration	13%
Service failure	18%	19%	20%	18%	19%	19%	Service failure	25%
Mediation	0%	0%	1%	1%	1%	1%	Mediation	0%
Redress	0%	5%	7%	8%	12%	9%	Redress	13%
No maladministration	12%	21%	20%	15%	12%	15%	No maladministration	38%
Outside Jurisdiction	22%	11%	8%	7%	5%	7%	Outside Jurisdiction	13%
Withdrawn	0%	0%	0%	0%	0%	0%	Withdrawn	0%

National Performance by Landlord Type: Table 2.2

Outcome	Housing Association	Local Authority / ALMO or TMO	Other	Total	Mid Devon District Council	
					Outcome	% Findings
Severe Maladministration	6%	9%	6%	7%	Severe Maladministration	0%
Maladministration	41%	45%	36%	42%	Maladministration	13%
Service failure	19%	18%	21%	19%	Service failure	25%
Mediation	1%	1%	0%	1%	Mediation	0%
Redress	12%	4%	5%	9%	Redress	13%
No maladministration	15%	15%	21%	15%	No maladministration	38%
Outside Jurisdiction	6%	9%	11%	7%	Outside Jurisdiction	13%
Withdrawn	0%	0%	0%	0%	Withdrawn	0%

Landlord Findings by Category | Cases determined between April 2023 - March 2024

Table 2.3

Category	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No maladministration	Outside Jurisdiction	Withdrawn	Total
Property Condition	0	1	0	0	1	1	0	0	3
Complaints Handling	0	0	2	0	0	0	0	0	2
Charges	0	0	0	0	0	1	0	0	1
Information and data management	0	0	0	0	0	0	1	0	1
Occupancy Rights	0	0	0	0	0	1	0	0	1
Total	0	1	2	0	1	3	1	0	8

**Findings by Category Comparison** | Cases determined between April 2023 - March 2024

**Top Categories for Mid Devon District Council**

Table 3.1

Category	# Landlord Findings	% Landlord Maladministration	% National Maladministration
Property Condition	3	33%	73%
Complaints Handling	2	100%	84%
Charges	1	0%	60%
Occupancy Rights	1	0%	50%

**National Maladministration Rate by Landlord Size:**

Table 3.2

Category	Less than 100 units	Between 100 and 1,000 units	Between 1,000 and 10,000 units	Between 10,000 and 50,000 units	More than 50,000 units	% Landlord Maladministration
Charges	0%	63%	47%	57%	65%	0%
Complaints Handling	100%	87%	87%	86%	81%	100%
Occupancy Rights	100%	67%	37%	49%	58%	0%
Property Condition	75%	63%	72%	74%	74%	33%

**National Maladministration Rate by Landlord Type:**

Table 3.3

Category	Housing Association	Local Authority / ALMO or TMO	Other	% Landlord Maladministration
Charges	61%	50%	75%	0%
Complaints Handling	81%	91%	91%	100%
Occupancy Rights	48%	51%	83%	0%
Property Condition	72%	77%	59%	33%

**Findings by Sub-Category** | Cases Determined between April 2023 - March 2024

Table 3.4

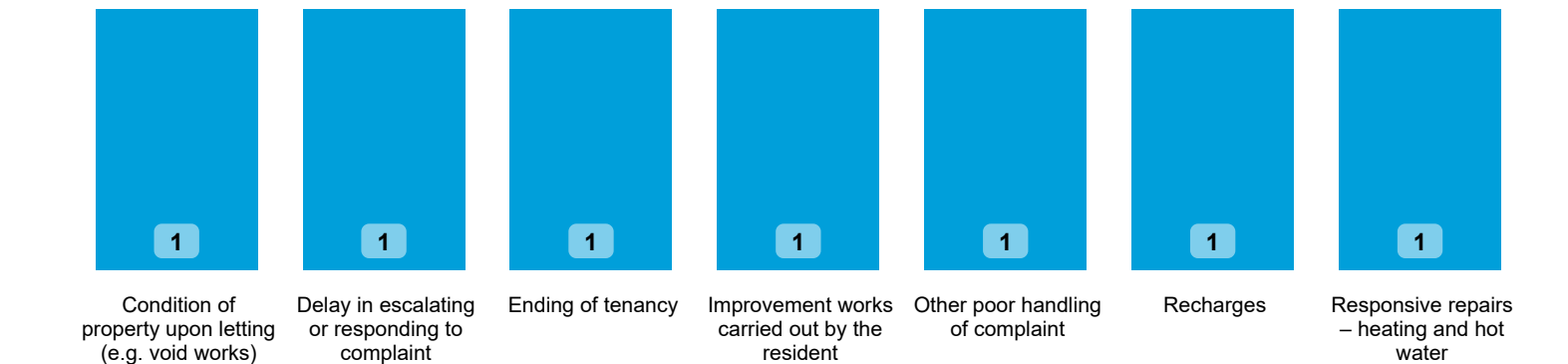
Highlighted Service Delivery Sub-Categories only:

Sub-Category	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No maladministration	Outside Jurisdiction	Withdrawn	Total
Responsive repairs – heating and hot water	0	1	0	0	0	0	0	0	1
<b>Total</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>



Top Sub-Categories | Cases determined between April 2023 - March 2024

Table 3.5



Orders Made by Type | Orders on cases determined between April 2023 - March 2024

Table 4.1



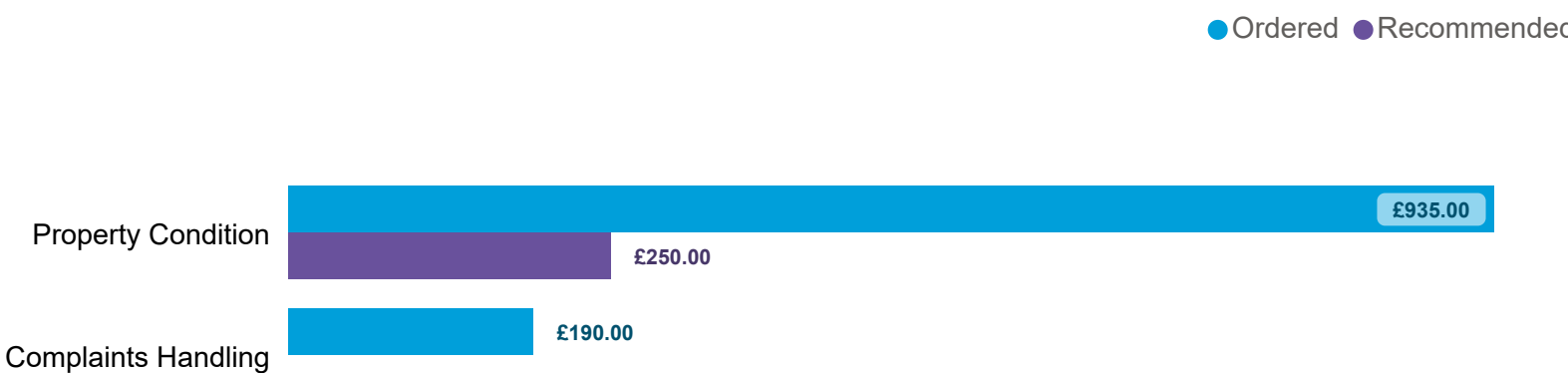
Order Compliance | Order target dates between April 2023 - March 2024

Table 4.2

Order Complete?	Within 3 Months		Within 6 Months	
	Count	%	Count	%
Complied	5	83%	1	17%
Total	5	83%	1	17%

Compensation Ordered | Cases Determined between April 2023 - March 2024

Table 5.1



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# COMPLAINT HANDLING ANNUAL REPORT SUMMARY 24/25

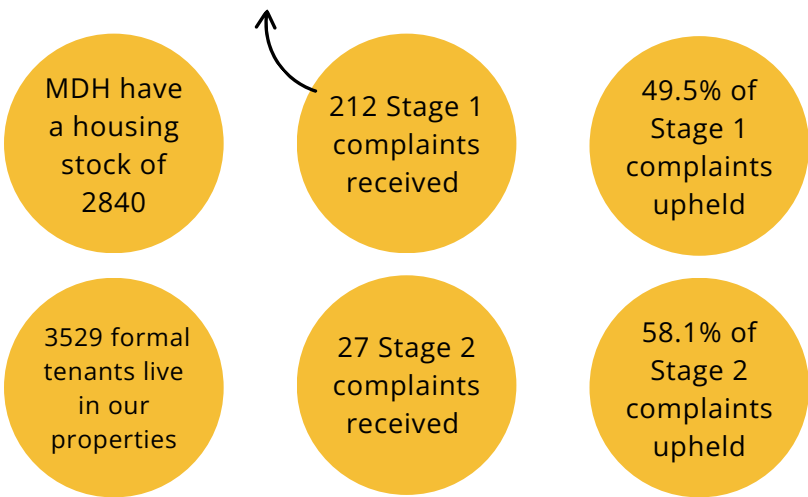


## Performance

Complaint handling performance is reviewed each month at a strategic level with the aim of identifying: any high risk areas of work, any systemic issues, and any issues which need to be escalated for discussion at a more senior level. MDH have seen a slight decrease in both Stage 1 and 2 complaints during the financial year 2024-25 in comparison to the previous financial year. This means we were able to resolve more complaints at stage 1 than before i.e. at an earlier stage to the satisfaction of the resident.

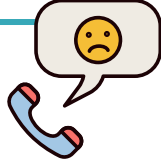
However it is noted that although complaints have decreased slightly, we have seen that complaints have become more complex and additional complaints have been raised in individual complaints. Therefore, the figures do not show a true reflection of the number of complaints being reported.

This equates to around 7.39% of our stock



## Breakdown

Summary of the top 5 categories for complaints:



- 1. Routine repairs - 46
- 2. Other planned maintenance - 28
- 3. Non housing ombudsman - 25
- 4. Planned maintenance - 22
- 5. Tenancy management - 18

Comparing these figures with 2023-24 figures, the only difference is the communications category is no longer in the top 5 and has been replaced with Planned Maintenance.

## Overall trend

MDH stage 1 complaint numbers decreased from 219 in 2023-24 to 210 in 2024-25 and equates to 75 complaints per 1,000 properties.

Nationally, complaints have continued to increase across the entire social housing sector driven by the regulatory changes and new Code alongside an increase in the national profile of the Housing Ombudsman Service (HOS). This is also expected to continue rising.

Despite MDH seeing fewer complaints than the previous year, this does not give a true reflection of the number of complaints received by MDH as often there are multiple complaints within one complaint raised. Furthermore, MDH have seen an increase in complex complaints which take longer to investigate to their complexity.

## Lessons learnt

During the financial year 2024-25, 13 specific lessons learnt were identified and actioned as a result of the service review and continuous improvement process.

MDH also carry out monthly strategic insight/focus meetings to discuss complaint handling data, identify themes alongside reviewing progress on implementing lessons learnt. Outputs from these meetings are fed back into a structured performance management process which all service managers and team leaders participate in.

During 2024-25, we have promoted the improvements we have made via our social media, web pages, newsletters and will publish these in our tenant annual report.

## Self assessment

Landlords including MDH are required to carry out an annual self-assessment against the Code. This is to ensure their complaint handling is in accordance with the requirements of the Code. Non-compliance could result in the landlord being issued with a Complaint Handling Failure Order by the HOS. MDH self-assessed against the Code in March 2025 taking into account the housing restructure of MDH. Relevant changes were made to show compliance with the Code.

## Compensation

MDH's Tenant Compensation Policy applies to tenants and residents of MDH. It covers both discretionary compensation which relates to loss, damage or inconvenience due to a service failure and statutory (obligatory) compensation. Each case is considered on its individual merit and discretion and we look to identify if the tenant or resident has been impacted negatively by our lack of actions. We consider the following when offering some form of compensation or good will gesture: out of pocket expenses, distress and upset, inconvenience caused, overall service failure.

Not all service failures result in an offer of compensation, as a simple apology is often suffice.

£16,672.78  
offers of  
compensation

£12,906.28  
offers accepted

£634 good will  
gestures  
offered

£584 good will  
gestures  
accepted

## Cases escalated

During 2024-25, we have seen 11 complaints escalated to the HOS and 3 complaints escalated to the Local Government and Social Care Ombudsman (LGSCO). This is an uplift from the previous year and may be reflective of the concerted drive to promote the overall complaints process and Ombudsman role both nationally and locally.

Out of the 11 complaints escalated to the HOS, 2 complaints were raised in 2024-25, 5 were raised in 2023-24 and 4 raised in 2022-23. However, of these 11 complaints, the HOS have determined 7 complaints and 4 complaints are awaiting investigations by the HOS. These determinations will not be expected until later in 2025.

During the past couple of years, the HOS has recruited a high volume of staff to investigate complaints. As a result of this, going forward, we should expect complaints escalated to the HOS to be investigate and resolved quicker.

Of the HOS cases for 2024-25 determined to date, this resulted in 4 determinations of maladministration, 1 service failure and 9 no maladministration or no service failure identified. MDH were ordered to pay £1040.00 in compensation. The LGSCO determined 3 cases in which they declined to not open up a full investigation.

To make a comparison with figures shown for 2024-25, in 2023-24, we received 5 determinations from the HOS of which 1 HOS case was refused as the complaint did not come under their remit and 1 LGSCO case was refused and appropriate advice was provided to the resident to pursue their case through the court.

## Tenant Satisfaction Measures

Registered providers of social housing (RPs) are required to collect and provide information to support effective scrutiny by tenants of their landlord's performance in managing their homes and neighbourhoods.

The TSM's form part of the key benchmark for all major registered providers of social housing including MDH. The emphasis behind these measures is clearly on tenant experience or satisfaction and how tenants feel we are performing alongside management information on repairs, safety, complaints handling and anti-social behaviour. MDH are required to submit TSMs data relating to complaint handling to the RSH each year as shown below.

Overall satisfaction with  
landlords approach to  
complaint handling

37%

number of complaints the  
landlord receives for each  
1,000 homes they own

75

Stage 1 complaints  
responded to within  
Complaint Handling Code  
timescales

98.9%

Stage 2 complaints  
responded to within  
Complaint Handling Code  
timescales

100%

Page 116 Overall satisfaction has risen from 22.2% to 37% compared to 23/24



## **Report for:** HOMES POLICY DEVELOPMENT GROUP

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Date of Meeting: 3<sup>rd</sup> June 2025

Subject: **VALUE FOR MONEY AND BEST PRACTICE IN MID DEVON HOUSING MODULAR SOCIAL HOUSING DELIVERY**

Cabinet Member: Councillor Jane Lock, Cabinet Member for Housing, Assets and Property

Responsible Officer: Simon Newcombe, Head of Housing and Health

Exempt: None

Wards Affected: All wards

Enclosures: Annex A: Zed Pods standards

Annex B: Value for Money benchmarking

Annex C: Awards

Annex D: Draft Social Value Impact Economic Appraisal Report St Andrews House, Cullompton

### **Section 1 – Summary and Recommendation(s)**

This report provides the PDG with the strategic and policy context supporting the delivery of modular (modern methods of construction, MMC) social housing in the Mid Devon Housing (MDH) Housing Revenue Account (HRA) development programme.

It further provides information and assurance in respect of the value for money and relative benchmarking with more traditional build schemes alongside the standards and best practice associated with our modular MMC approach. The report also sets out the wider context and benefits of the programme with regard to regeneration, net-zero carbon, added or social value and tenancy sustainment.

### **Recommendation(s):**

1. The PDG notes the report

2. That the PDG recommends that Cabinet continues to adopt an HRA development programme with a focus on delivering MMC, modular net-zero social housing where possible and viable as part of the Council's future Housing Strategy

## **Section 2 – Report**

### **1 Introduction**

#### **Strategic context**

- 1.1 In response to a national acute housing crisis, in July 2024 all councils in England were given new, mandatory housing targets aimed at providing 1.5 million new homes. Within this, the government has pledged the biggest boost to affordable, social, and council housing for a generation.
- 1.2 One of the principle mechanisms to address the shortage of affordable housing specifically is the Affordable Homes Programme under Homes England. The government recently announced a new, larger, £11.5bn Affordable Homes Programme 2021-26 (AHP), including funding for social rent, supported housing, and a renewed commitment to delivering homes using modern methods of construction (MMC).
- 1.3 In March, the government announced £2bn in grant funding as a "down payment" on a future AHP to support the delivery of new social and affordable homes.

So far, we know that Homes England have indicated that this funding:

- Will be delivered on the same terms as the current Affordable Homes Programme including a commitment to MMC
- Will be prioritised for homes for social rent.

#### **Local context**

- 1.4 In July 2024, Lord Best reported on the Devon Housing Commission setting out a real housing crisis in this county, emphasising an acute shortage of homes affordable for the next generation. In a series of recommendations aimed at central government, strategic Devon partners and at local district level, in the context of new affordable housing there is a focus on:
  - Commitment to the ongoing AHP with a focus on social rented homes;
  - Opportunities for a Devon Housing Strategy and greater regional coordination;
  - Increased delivery of social rented housing at type and location of need;
  - Strengthened support for the Devon Carbon Plan; and
  - Increased focus on rural exception sites

- 1.5 The Council have led many aspects of a local response to this housing crisis through its Housing Strategy 2021-25 and its increased delivery of social rented housing within its council HRA stock.
- 1.6 Within this strategic context and national direction, there is a strong synergy with regard to our local objectives and targets as set out below
- MDDC Housing Strategy - 19 objectives within Strategic Housing Priority 1 including those specific to supply of new homes and sustainability, meeting housing needs and raising building design standards including piloting MMC, design quality and climate change
  - MDDC Corporate Plan 2024-28 – Homes as a strategic theme with specific objectives to increase the delivery of quality designed, well built homes across the housing market to meet identified needs and building of energy efficient and low carbon homes
  - Rolling 5-year/500 unit HRA development programme with sub-targets around MMC delivery
- 1.7 The Housing Strategy is due for review with the adoption of a new strategy in 2026 where a review and assessment of the HRA building approach as set out within this report is timely.
- 1.8 With respect to the HRA development programme for MDH, it has allocated 29 additional properties within its stock since April 2024 and has acquired a further 28 units ready for occupation shortly. A number of additional sites have full planning permission for social housing with development commenced on several of these. These have been a mix of buy-back acquisitions, traditional build schemes and MMC modular net-zero. It is worth noting that MMC therefore only represents an element of the MDDC HRA development pipeline – albeit that it is providing a steady flow of additional properties to the portfolio, as referenced below. It is also worth noting that MDDC has also been instrumental in enabling the delivery of other affordable housing units within the district – for example the 70 new properties at Post Hill.
- 1.9 In respect of its delivery MMC modular net-zero carbon units, three schemes are now fully complete and the Council are moving forward with additional Zed Pods designed and commissioned schemes as set out below.
- St Andrews House, Cullompton – 6 units (complete March 2024)
  - Shapland Place, Tiverton – 8 units (complete October 2024)
  - Crofts, Sandford – 5 units (complete April 2025)
  - School Close, Bampton – 18 units (underway – due for completion January 2026)
  - Beech Road, Tiverton – 8 units (underway – due for completion September 2025)
  - Holly/Sycamore Road, Tiverton - 13 units (underway – due for completion November 2025)

- Fir Close, Willand – 1 unit (underway – due for completion November 2025)
- Eastlands, Hemyock - 5 units (underway – due for completion December 2025)
- Somerlea, Willand - 7 units (planning permission obtained – due to commence August 2025)
- Watery Lane, Tiverton - 10 units (planning permission obtained – due to commence January 2026)
- Roundhill, Tiverton – potentially 12 units (currently in pre planning – due to submit July 2025)
- College Green, Uffculme - 2 units (planning permission obtained – due to commence September 2025)
- Churchill Drive, Crediton – 3 units (planning permission obtained, due to commence February 2026)

There are a number of additional projects at concept, early design or draft planning stage for implementation later in the development programme with an ongoing emphasis on MMC net-zero specification homes.

### **Funding and external assessment**

- 1.10 MDH fund all of its schemes through the HRA with a key contribution from external funding sources in order to provide viable, high-quality and which are typically available at lowest, most affordable social rent. External funding grants have come via AHP and the One Public Estate (OPE) Brownfield Release Fund (BRLF) including the Prisoner Building Homes funding alongside one-off Devolution Programme support.
- 1.11 The Council's bids into these external funding schemes are subject to a strict assessment criteria and capital funding rules where the Council has been successful in its leverage of maximum grants for its modular housing schemes in particular. This is due to a range of factors directly associated with the Zed Pod developments and our development approach:
  - Project deliverability;
  - Track record of successful deliverability;
  - Suitability for infill regeneration projects at point of need/within existing settlements and HRA developments;
  - Design and high quality specification (MMC and operational net-zero, ultra-low energy/tenant utility costs); and
  - Social rent and high potential for tenancy sustainment
- 1.12 In the last 12-months alone, our MMC net-zero schemes have unlocked around £5.5m of grant funding at an average of £75k per unit, outperforming contributions to traditional, lower-specification schemes. This has significantly enabled and supported the viability of these schemes at the most affordable social rent level, thereby reducing the net-cost of the Council and its HRA and enabling it to meet its Housing Strategy and Corporate Plan objectives.



- 1.13 Each of these external funding programmes undergo an independent scheme by scheme viability and value for money (VfM) assessment where the overall project costs must fall within defined parameters. The case of AHP this includes benchmarking against national metre square floor costs. Unless our schemes fall within the required VfM parameters they are ineligible for funding.
- 1.14 Whilst Homes England and OPE/Ministry of Housing, Communities and Local Government (MHCLG) do not provide applicants (or otherwise publish) the specific VfM outcomes for each scheme in order to maintain commercial sensitivity and a level playing field for applicants, all of the Council schemes have been determined as eligible – demonstrating that Government assessors are happy with the information and costs submitted in relation to our grant funding applications. Feedback is that our MMC modular schemes sit at the upper end of VfM and therefore attract a higher level of financial support.
- 1.15 As a result of its deliverability and VfM track record in MMC and net-zero social housing, the Council have become a ‘continuous market engagement’ delivery partner with Homes England.
- 1.16 From April 2025, this Homes England partnership enables the Council continued access to the AHP programme post-2026 facilitating grant funds for more schemes that will complete much later (by March 2029). This provides the Council with ongoing, more seamless and extended access to AHP whilst a future AHP scheme is developed and is very much a vote of confidence in our development programme and our track record of successfully in delivering new, high quality social housing.
- 1.17 Under this extended, continuous engagement arrangement, funding allocations will be made within the same parameters as the current AHP 2021-26 including priority for MMC and social rent. This demonstrates the importance of MDH meeting these key national requirements in full and validates the innovative modular development programme approach that the Council has adopted alongside other methods of delivery.

## **2 Typical MDH modular build and design**

- 2.1 The Devon Housing Commission report has evidenced the importance of providing more, high quality affordable housing that meets local needs. Consequently, it is important we continue to deliver social housing into the MDH stock in locations of demand, at a scale and type that meets measured housing needs and helps to sustain our village and town communities.
- 2.2 The MDH development programme with its modular MMD focus was designed from the outset to meet common objectives through a ‘right home at right place’ approach with a number of core features:
- Smaller, infill schemes scaled to meet local needs across the district
  - Use of brownfield, under-utilised land within existing communities
  - MMC off-site construction to minimise construction phase impact on current residents and neighbours

- High-quality, long-term design that meets a wide range needs
- Focus on low-tenant costs and long-term tenancy sustainment
- Provision of local infrastructure improvements to support wider regeneration and local benefits e.g. local drainage improvements, additional community parking, biodiversity enhancements
- Unlocking maximum grant funding to support viability

2.3 As a result, the typical MDH MMC modular scheme has the following characteristics:

Location and design	Approach	Performance
<ul style="list-style-type: none"> <li>• Use of former redundant garage and other brownfield land with demolition of existing structures and removal of asbestos containing materials (e.g. garage roofs),</li> <li>• Bringing low-value land into productive use</li> <li>• Small scale, 7-8 units on average, within the curtilage of existing MDH communities</li> <li>• 1-3 bedroom units; mix of flats, maisonettes, bungalows and homes with private outside areas together with a mix of communal and private gardens</li> <li>• Flexible appearance and massing designed to work well with local architectural precedents / sensitive to existing conservation areas and other planning considerations</li> <li>• Additional mature planting and other biodiversity/landscape enhancements including bird and bat boxes,</li> <li>• Sustainable urban drainage provision, permeable parking above 1.7 spaces per dwelling requirements that is free to use by the local community</li> </ul>	<ul style="list-style-type: none"> <li>• Zed Pods ‘turnkey’ procurement – feasibility, design, planning, build and commissioning under proven performance standards</li> <li>• Pre-planning engagement with the MDDC Development Management and local town and parish councils, current MDH tenants and wider residents</li> <li>• Wholly new build plus net-uplift - replacement of end-of-life existing, low EPC homes on specific schemes with an increase in overall number of units</li> <li>• Measurable overall social value uplift (see St Andrews project example in Annex D)</li> </ul>	<ul style="list-style-type: none"> <li>• Highest Energy Performance Certificate (EPC) A+ rated and net-zero operational carbon certification</li> <li>• Roof mounted photovoltaic solar panels for electricity generation and heat pumps with mechanical ventilation and heat recovery</li> <li>• Significant energy/utility cost reductions for tenants together with water saving design and energy efficient appliances</li> <li>• Steel frame with thick wall natural stone wool insulation, triple glazing</li> <li>• Reduced maintenance cycles and lower long-term costs</li> <li>• Meet or exceed Building Regulation requirements including new-homes durability and minimum 60-years lifespan, nationally described space standards, overheating and all relevant safety standards including fire safety</li> </ul>

- 2.4 Further information on the design and quality assurance standards that underpin Zed Pod modular homes is set out in Annex A.

### 3 Innovation, evaluation and awards

- 3.1 Whilst MMC and off-site modular construction of homes is common across Europe and the USA it remains less widely used and understood in the UK and consecutive Governments have been keen to promote and expand its use as a mechanism to deliver additional homes at pace. Despite rapid advancements in materials, manufacturing, digital transformation and technology, the development sector has nonetheless largely remained largely unchanged and focused on traditional build.
- 3.2 Innovation, and therefore change, sits at the heart of the Council's MMC modular approach and demonstrates how high quality, durable, low-carbon future-proofed MMC social housing can be viable and delivered at social rent levels whilst achieving wider regeneration benefits and sustainability benefit for local communities.
- 3.3 As result, this non-traditional development focus has required ongoing education and engagement to set out the rationale and benefits of our approach. Nonetheless, the feedback from all stakeholders including Homes England, OPE, local and district members, new tenants and the wider public has been overwhelmingly positive and the strong, positive alignment with national and local strategic housing objectives has been clearly defined.
- 3.4 This feedback isn't just strategic at one level or anecdotal at another, it has been unpinning by post-occupancy evaluation (such as the University West England' report a Zed Pod modular project at Hope Rise, Bristol) and the survey of residents at our St Andrew's House scheme as set out below.

How would you rate the building in terms of its aesthetics?

Answered: 4 Skipped: 0

8.3

average rating



How would you rate the building in terms of its design and lay...

Answered: 4 Skipped: 0

8.5

average rating



How would you rate the interior of the apartments?

Answered: 4 Skipped: 0

9.8

average rating



How would you rate the homes in terms of overall quality?

Answered: 4 Skipped: 0

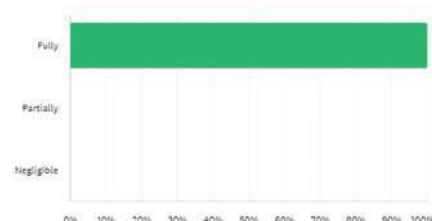
9.3

average rating



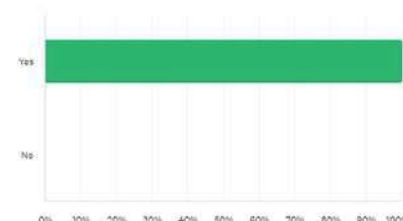
Has the project met your expectations for sustainable develo... \*\*\*

Answered: 4 Skipped: 0



Do you agree that the project has significantly transformed th... \*\*\*

Answered: 4 Skipped: 0



- 3.5 Our modular schemes have also been visited post-completion as key demonstration projects by a number of MHCLG, Homes England and OPE teams together with visits by a wide number other Local Authorities / private registered social housing providers and Devon County Council commissioning and delivery colleagues.
- 3.6 This has generated a high level of regional and national recognition through our St Andrews House and Shapland Place schemes in particular with these either winning or being a finalist in a number of development awards, as listed in more detail in Annex C.
- 3.7 MDH and Zed Pods were also invited to present on our collaboration and innovation in delivering modular social housing at the Chartered Institute of Housing (CIH) South-West Regional Conference in February 2025. As a result, we have been jointly invited to do the same at the joint, national CIH / National Housing Federation 'Housing Community Summit' in September this year. An event which brings together the housing sector's key stakeholders, politicians, and housing leaders and practitioners from across the country to debate and shape the future of social housing.

#### **4 Traditional versus Modular construction**

- 4.1 A number of independent studies have been published that take a closer look at these different approaches to construction. Examples include the Jones Lang LaSalle study (2021), Procurement Partnership Frameworks (2022), BES (2024) and Travis Perkins (2025).
- 4.2 These studies provide helpful, independent comparative analysis and typically focus on three areas – time, cost and quality/design and sustainability.

##### **Time**

- 4.3 When considering the various differences between MMC and traditional housebuilding, perhaps the most obvious is time to completion. On average, off-site manufacturing reduces construction time on-site by around a third.
- 4.4 Notwithstanding delays caused by poor utility mapping and under-capacity in utility providers to resolve issues quickly, which impact brownfield traditional and MMC projects equally and is a national issue, for social housing developers and local authorities including MDH, this time saving directly translates to revenue generation, as we can fill tenancies more quickly and begin to collect rent. Furthermore, the ability to produce more social housing quickly into our stock provides much needed support to address the local housing crisis and deliver on our strategic housing goals.
- 4.5 MMC's ability to deliver units more quickly, together with strong quality/sustainability credentials and VFM benchmarking, is therefore one of the main reasons it is being prioritised by Homes England's AHP (2021-26).
- 4.6 Potentially therefore, time savings on-site and quicker completions could be sufficient reason for more developers to explore MMC when the UK is in the

midst of a housing crisis and perennially missing its 300,000 homes a year target. Unfortunately, it is unlikely the time savings alone will encourage private build- for- sale developers to fully embrace MMC, particularly high-volume builders that hold significant numbers of a existing permissions and extensive land-banks where market control may be featured more strongly over speed of delivery. These time-saving considerations are perhaps much more of interest to social housing developers, hence the Council embracing an MMC approach where time is considered to be a significant factor.

## **Cost**

- 4.7 As highlighted above, one of MMC's main advantages relates to the time it can save in the construction process. However, at present it is not automatically a cheaper way to build homes. MMC requires a constant pipeline, a repetition of product, and thus relies on economies of scale or highly localised manufacturing efficiencies and flexibility in order to generate ever-more efficient returns. Thus, larger scale projects and a consistent pipeline would mean eventual, more significant cost savings, but as it stands today, the industry is not at that scale.
- 4.8 Equally, this does not mean small scale modular projects, such as those the Council are undertaking, delivered in close collaboration with development cannot compete against traditional build costs, especially when benchmarked fairly against lower-volume and smaller scale brownfield traditional built schemes. This is evidenced through the AHP and other external funding VFM and assessment process as set out above and through an individual analysis of whole project costs and our completed schemes to-date. More information and data on benchmarking our Zed Pod modular schemes is set out below and in Annex B.
- 4.9 Cost can also relate to much more than just build cost. If you take into account less time on site, council tax and rents coming in quicker, less waste overall, less repairs in the future, and less disruption to neighbours and the community during construction, it could be seen as a cost benefit in the long run.
- 4.10 These added value factors can be used to develop a social value cost-benefit ratio for a specific scheme which provides a much more realistic, holistic assessment of value capturing a range of benefits. This includes tangible and measurable benefits in monetary terms, directly impacting budgets, non-cashable benefits that improve value for money, community benefits and other benefits that are difficult to monetise but improve quality of life, well-being or enhance public trust and engagement.
- 4.11 This has been recognised by Zed Pods who have been working in conjunction with the Ministry of Justice (in respect of its engagement in the Prisoner Building Homes programme) and the Council to develop such an assessment which draws upon published, verified sources of data including many produced by central government as part of an economic appraisal approach that forms a

critical part of the HM Treasury Green Book business case methodology – a standard approach that can be used by Council's and the wider public sector in seeking approval of capital projects.

- 4.12 This social value appraisal is a developing approach, however a draft example report for St Andrews House is shown in Annex C which shows a significant overall benefit / cost ratio of 8.15.

### **Quality, Design, and Sustainability**

- 4.13 One of the greatest differences between traditional building and MMC is the ability to ensure a level of quality in the finished product that meets exact design specifications.
- 4.14 Due to its repeatable manufacturing process in a controlled indoor environment compared to a less controlled outdoor process, manufacturers of off-site modular units can guarantee homes that will achieve certain design standards and meet regulatory safety requirements. Design errors can be closely monitored under accredited processes and systems (e.g. ISO 9001 and 45001) where any issues can immediately be identified and addressed, significantly mitigating risk.
- 4.15 The durability of MMC is further key consideration. The Zed Pods MMC specification has longer replacement cycles for key planned maintenance items such as doors, windows, roofs and kitchens. Enhanced life cycles and planned maintenance cost reductions can be built into the long-term financial planning of the HRA with confidence, further supporting the overall viability of the schemes. This is enhanced further where MMC is used to replace end-of-life or poorer quality stock with higher planned maintenance costs where less beneficial expenditure can be removed from the future balance sheet delivering net savings in the long-term and supporting the overall financial sustainability of the HRA.
- 4.16 One of the biggest, emerging challenges facing the housing sector currently is fire safety. This includes the provision of non-combustible insulation and cladding materials with a more stringent focus on building safety. MMC has a clear advantage over traditional build given the controlled manufacturing process and assurance that each unit is an exact replica of the original design to ensure regulatory standards are met. Additionally, as all the data for each design is readily accessible, it is straightforward to establish the exact specifications of each unit so if there were any issues with materials it would be straightforward to identify products and units affected and thus easier to resolve.
- 4.17 With traditional build however, there is no guarantee that the contractors have been able meet the exact design specifications and significantly less control over the overall construction process.
- 4.18 It is becoming widely accepted that decarbonisation is becoming one of the greatest driver for change in the construction industry. Recent data from the

Department for Business, Energy & Industrial Strategy shows that in 2020, the residential sector accounted for 21% of all carbon dioxide emissions. The UK has committed to be Net Zero Carbon by 2050 with Council adopting an even more stringent aim of being carbon neutral by 2030, therefore the homes being built must be highly energy efficient. According to a number of manufacturers, MMC delivers at least an EPC B. In the case the Zed Pod units provided the Council this is higher again at EPC A and certified operational zero-carbon.

### **Potential MMC constraints**

- 4.19 No construction approach is perfect and there are constraints or challenges inherent with each that is chosen. The challenges of MMC include a general risk uncertainty from potential tenants and clients which can be overcome through education and engagement. As noted above, post-occupancy surveys at our longest running scheme (St Andrews House) have shown very high levels of tenant satisfaction.
- 4.20 There has been similar risk aversion from some warranty providers which is again being addressed and all the Council MMC schemes come with industry standard, full 10-year new build warranties including the high quality 'Q Policy' and ICW warranty assurance. This means our units are being built to a fully mortgageable standard.
- 4.21 Further disadvantages include the fact that some people don't like how modular styles look. This was more the case through early designs when the MMC industry was in its infancy. Since then, newer providers such as Zed Pods and others have been able to bring forward designs that are highly flexible where completed schemes can be indistinguishable from contemporary and older traditional build archetypes.
- 4.22 There needs to be assurance on structural design to avoid fragmentation, especially if material choices and assembly are poor. This is overcome through BRE (Building Research Establishment) design assessment, Buildoffsite Property Assurance Scheme (BOPAS) including steel framed systems and other accreditations using an architect led approach. All of which is applicable to Zed Pods and an essential consideration in any MMC supplier the Council uses. See Annex B for further information.
- 4.23 MMC and net-zero heating systems are different from traditional gas-fired or other electrical heating systems with benefit of a high degree of thermal stability. All of which feels different to tenants more familiar with traditional build properties and conventional systems. This has been overcome through the MDH teams working closely with our supplier to on-board tenants including the use of bespoke welcome leaflets and home user guides.
- 4.24 Some UK planning teams remain cautious of MMC and modular buildings, unlike countries such as Scandinavia who have adopted MMC more widely. This comes down to awareness, familiarity and experience of specific planning officers. This potential challenge has not been the experience in Mid Devon and we have worked closely with the Planning Development Management team



through a demonstration unit, site visits and the pre-application process to overcome any misunderstandings.

- 4.25 Finally, off-site manufacture requires the development site having adequate road access to enable HGV/crane delivery of the modular units. With planning and careful route and site assessment. Almost all sites within the district that have been evaluated have proven suitable, however a small number of sites are too constrained where traditional or different types of MMC schemes may be required.

## **5 Benchmarking of MMC modular schemes**

- 5.1 Largely setting aside where the Council's MMC approach aligns and underpins its strategic objectives and social housing delivery as described above, there is still validity in undertaking more quantitative cost benchmarking of our new housing schemes against other housing projects in order to provide assurance on VfM.
- 5.2 As has been set out above, there are a number of key over-arching differences between traditional build and MMC development approaches. There are further site-specific differences ranging from specification of each home and energy performance, unit sizes, low-volume brownfield vs high-volume greenfield sites, utility constraints and costs, demolition and disposal costs, infrastructure and wider regeneration deliverables together with sites with or without significant communal build spaces. There also significant differences in overall value and long-term costs with variable benefit to cost ratios.
- 5.3 It is also valid to highlight the differences between VfM and cheapest or low-cost. VfM goes beyond cost savings by considering the overall benefits of a purchase or investment. It evaluates quality, sustainability, risk mitigation, and long-term outcomes relative to the cost and needs to consider the life-cycle of the asset not just the up front cost.
- 5.4 When it comes to overall viability and VFM of a particular scheme, then it is not just a comparison or assessment of gross project cost but requires an understanding of the net cost to the Council. This is particularly relevant where different specification and design/delivery approaches can unlock variable levels of external grant funding as set out in Section 1 above.
- 5.5 As with all public sector expenditure on goods and services, the process of procuring new housing must comply with strict public procurement rules including the recently implemented Procurement Act 2023. Whilst all of its new housing contracts are fully compliant with these legal requirements, there are nevertheless differences in terms of the competitiveness of a procurement exercise and the number of suppliers able or willing to enter into a process and provide a price against a specific required specification.
- 5.6 In order to provide assurance in respect of procurement and ensure maximum consistency of pricing without putting each housing scheme through an expensive bespoke market tendering exercise, direct awards may be

undertaken. A direct award is permitted under the current procurement legislation and each direct award is made under a compliant framework.

- 5.7 Frameworks are umbrella agreements that set out the terms, that include specification, quality, price, quantity, under which individual contracts (call offs) can be made during the lifetime of the framework (normally 4 years). Legislation governs the way frameworks are run. Suppliers compete through open competition to be appointed to a framework. Publicly funded contracting authorities such as the council then call off individual contracts.
- 5.8 In terms of VfM considerations, the key advantages of direct awards via frameworks is the scale and assured volume of potential delivery across a wide number of potential clients and organisation is attractive, therefore they attract a wide range of suppliers. The frameworks also provide wider assurance due to in-depth expertise in specific sectors, high quality specifications and pre-tender engagement through to consistency and independence of the evaluation and award process. They also provide additional financial protections to organisations calling off contracts. Overall, these benefits substantially de-risk the process for the Council in what are major capital investments. There are further advantages in speeding up the procurement process and enabling housing to come forward more quickly.
- 5.9 These differences and considerations make benchmarking costs highly challenging where it is easy to arrive at invalid comparisons as a result. Where comparisons are made, where possible, it is important to set out the key differences between projects and specific sites where these are known in order to understand how cost differentials may arise in order to inform the overall VfM assessment.
- 5.10 Notwithstanding these challenges, a detailed benchmarking cost comparison is set out in Annex B which compares the costs of several complete or pending traditional build schemes with modular schemes within the MDH stock. Therefore, these are schemes contracted by the Council where it has full information on costs and specification. Against this, information has been obtained from other traditional or MMC schemes commissioned by other organisations but in similar settings (scale, social housing etc), some of which have also benefited from AHP grant and therefore assurance.
- 5.11 From Annex B, it is possible to compare unit or metre square costs for our completed St Andrews, Shapland Place and Crofts schemes and our Holly Road and Beech Road schemes currently under construction which are all Zed Pods MMC modular against a separate Beech Road scheme, a tendered build scheme in Cullompton, a completed social housing scheme in Bristol (New Kingsland) which are all traditional build and a different type of MMC affordable housing scheme completed in Portsmouth (EBC Former Post Office). All of these schemes have been priced (tendered), live and/or completed within the last 2-years in order to provide a valid comparison.

- 5.12 Of the non-Zed Pods MMC and traditional build schemes, these were selected due to the availability of data and that the schemes were all lower-volume, infill and typically brownfield regeneration projects providing affordable housing. However, none of the schemes has a comparable EPC A+ zero-operational carbon specification as provided for by the Mid Devon Zed Pods units and are all lower specification EPC B rated developments.
- 5.13 The findings of this benchmarking exercise are the MDH Zed Pods schemes consistently perform well in a comparison of measured unit and m2 costs of the other schemes, both traditional build and MMC as ranked in Table 1 below despite having highest overall EPC specification at social rent.
- 5.14 Of the five Zed Pod schemes in the comparison table typical of the Mid Devon development programme (complete and in progress units), four are in the top-five rankings (lowest cost). This includes the Shapland Place scheme characterised by exceptional regeneration and community benefit but with associated atypical infrastructure uplift i.e. more than double parking provision over planning policy requirements, steel podium/flood zone design, enhanced drainage attenuation and EV charging provision.

Table 1 – Summary of net cost benchmarking data (Zed Pod schemes in bold)

Ranking (Cost – Low to High)	Net average cost per unit*	Net cost per m2 (gross living floor area)
1	<b>St Andrews House Zed Pods MMC Modular</b>	<b>Beech Road Zed Pods MMC Modular</b>
2	<b>Beech Road Zed Pods MMC Modular</b>	<b>Holly/Sycamore Road Zed Pods MMC Modular</b>
3	<b>Holly/Sycamore Road Zed Pods MMC Modular</b>	<b>St Andrews House Zed Pods MMC Modular</b>
4	<b>Crofts Zed Pods MMC Modular</b>	9No. North Somerset, Bristol & Gloucs MMC Modular
5	<b>Shapland Place Zed Pods MMC Modular</b>	<b>Shapland Place Zed Pods MMC Modular</b>
6	Beech Road Traditional Build	Honiton Road Traditional Build
7	EBC Former PO MMC	<b>Crofts Zed Pods MMC Modular</b>
8	BCC New Kingsland Traditional Build	BCC New Kingsland Traditional Build
9	Honiton Road Traditional Build	Beech Road Traditional Build
10	-	EBC Former PO MMC

\* Average costs are not available for the 9no. North Somerset, Bristol & Gloucestershire MMC Modular benchmarking in Annex B with net average m2 data only

- 5.15 Considering a summary of average net cost m2 benchmarking data by build type based on gross floor living area provided:

- Average all Zed Pods MMC Modular (5no. EPC A/Zero C): £2,571.88

- Average all traditional build schemes (3no. EPC B): £4,103.65
- Average all non-Zed Pods MMC (9no. EPC B): £2,387.65

The Zed Pod schemes largely perform better on a cost per m2 comparison against the traditional build schemes and are comparable with the non-Zed Pods MMC schemes. Both of these comparison schemes types are built to lower EPC specification that do not achieve zero-operational carbon performance.

- 5.16 This favourable net cost for the Zed Pods units is reflective of overall costs for delivery together with strong compatibility with external funding streams, enabling higher grant leverage and competitive net costs for the Council. This is whilst providing high quality accommodation that has lower running costs for tenants and enhanced tenancy sustainability alongside reduced cyclical planned maintenance costs long-term for the HRA, especially in comparison with traditional build schemes.
- 5.17 The ability to bring forward viable Zed Pod schemes at the formula social rent level further enhances the overarching strategic and financial alignment within the Council. In turn, this further strengthens our response to the housing crisis as a social housing provider through the provision of future-proofed homes at the most affordable, and therefore most accessible, rent level for our communities.

## **6 Conclusions and summary**

- 6.1 Overall, the MMC modular housing building approach that has been adopted for Council Housing by MDH under its HRA is directly aligned with our wider national and local strategic objectives.
- 6.2 It forms a highly effective and tangible response by the Council in terms of the delivery of more affordable housing for local people at lowest social rent. The shorter on-site build times and overall reduced project timeline bring forward critical new housing at relative pace.
- 6.3 The Zed Pods MMC modular design and high quality specification for Mid Devon unlocks greater external funding support through the Homes England Affordable Homes Programme and the MHCLG Brownfield Release Programme in particular.
- 6.4 This strong placement of our MMC modular schemes provides greater certainty of delivery and de-risks the Council through; a reduction in the long-term costs to the HRA, enhancement of the overall viability of the projects and clear VfM benchmarks resulting in competitive net financial costs in comparison with traditional build schemes and other MMC.
- 6.5 These modular schemes are particularly suited to low-volume, infill sites using existing HRA land where they provide housing to meet defined local needs and support the sustainability of local communities.

- 6.6 The flexible, zero operational carbon, neurodiversity-friendly homes also help the Council to meet its corporate environmental, sustainability and social value aspirations with clear overall benefit to cost ratios.
- 6.7 The standards and design introduced by the Zed Pod units meet or exceed all regulatory standards and provide an innovative approach to social housing building that is inherently better than typical traditional build approaches. This is especially the case for the smaller, infill schemes required to meet housing needs and sustain our communities across the district.
- 6.8 The quality and effectiveness of our completed schemes is already been set out through post-occupation evaluation and feedback from tenants and other stakeholders and myriad of industry awards where the Council is building an enviable track-record of delivery.
- 6.9 Overall, the MMC modular programme is capable of playing a continued key role in the delivery of more Council houses for residents at a time of critical need. The programme demonstrates this can be done without compromise on quality and will drive forward improved tenancy sustainment through the high accommodation standards, significantly reduced tenant running costs and overall enhanced tenant experience.
- 6.10 Given such a positive assessment and strong overall VfM and deliverability, it is important that the Council continues to support, refine and grow its MMC modular housing building programme in order to meet its house building targets and wider objectives.

## **7 Recommendations**

- 7.1 In accordance with the above, the following recommendation are made:
1. The PDG notes the report
  2. That the PDG recommends that Cabinet continues to adopt an HRA development programme with a focus on delivering MMC, modular net-zero social housing where possible and viable as part of the Council's future Housing Strategy

## **Financial Implications**

The activity of MDH including its development programme is funded through the Housing Revenue Account (HRA). The HRA is ring fenced and subject to specific financial controls.

In case of its modular MMC projects in particular, development costs are significantly supported through the successful leverage of external grant.

Financial benchmark data is set out in Annex B of the report and wider VfM considerations set out within the report.

## **Legal Implications**

The compliance of the Zed Pods MMC residential build system with regulatory standards, performance, technical certifications and accreditation together with other related criteria are set out within report and in more detail within Annex A.

### **Risk Assessment**

This is set out within the report including strategic context and alignments, an assessment of traditional build versus MMC modular construction, specification and further specific alignment with grant funding and reduced net financial costs, VfM benchmarks and the overall conclusions as summarised above.

### **Impact on Climate Change**

All Zed Pods MMC modular development provided for the Council are EPC A+ and zero operational carbon rated.

### **Equalities Impact Assessment**

Not applicable

### **Relationship to Corporate Plan**

Homes are a strategic theme with specific objectives to increase the delivery of quality designed, well built homes across the housing market to meet identified needs and building of energy efficient and low carbon homes.

## **Section 3 – Statutory Officer sign-off/mandatory checks**

**Statutory Officer:** Andrew Jarrett

Agreed by or on behalf of the Section 151

**Date:** 22 May 2025

**Statutory Officer:** Maria de Leburne

Agreed on behalf of the Monitoring Officer

**Date:** 22 May 2025

**Chief Officer:** Richard Marsh

Agreed by or on behalf of the Chief Executive/Corporate Director

**Date:** 22 May 2025

**Performance and risk:** Stephen Walford

Agreed by the Chief Executive

**Date:** 22 May 2025

**Cabinet member notified:** Yes

## Section 4 - Contact Details and Background Papers

**Contact:** Simon Newcombe, Head of Housing and Health

Email: [snewcombe@middevon.gov.uk](mailto:snewcombe@middevon.gov.uk)

Telephone: 01884 255255

### Background information:

Zed Pods Ltd Homepage

[OUR HOMES | ZEDPods](#)

Mid Devon Housing Development Hub with access to more detail on specific modular and traditional build schemes in the current HRA development programme

[MDH Development Hub | Let's Talk Mid Devon](#)

HM Treasury 'Green Book' guidance on how to appraise policies, projects and programmes.

[The Green Book and accompanying guidance - GOV.UK](#)

Guidance on different types of Modern Methods of Construction (MMC)

[Microsoft PowerPoint - The MMC Definition Framework - Michelle Hannah \(July 2019\)](#)

Social Rent Housing at Pace – The MMC Playbook (Housing Festival 2024)

[Social Rent Housing at Pace Playbook — Housing Festival](#)

Guidance on direct award procurement frameworks

[Procurement Routes - Building Better](#)

[Modern Methods of Construction \(MMC\) for New Homes \(NH3\) | Frameworks | LHC LSE](#)

BOPAS accreditation for Zed Pods

[ZED PODS - BOPAS](#)

ICW building warranty information as applicable to Zed Pods

[Building Warranty Specialists | ICW Insurance Services](#)

More information on the Considerate Constructors Scheme

[Considerate Constructors Scheme](#)

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## Annex A Zed Pods Standards

### General

Zed Pods Ltd are an architect-led turnkey modular build company providing high specification homes that are zero carbon in operation. Their focus is on the delivery of high quality modular buildings and associated services that meet, and in some cases exceed, all relevant statutory and regulatory standards. They provide eco-friendly, affordable housing solution through the utilisation of volumetric offsite MMC technology.

They are part of a number of approved public sector procurement frameworks including the Building Better MMC Category 1 and 2 Frameworks and SWPA (South West Procurement Alliance) MMC New Homes NH3 (previously NH2). They are also a Crown Commercial Service and NHS approved supplier.

They also hold the King's Award for Enterprise for Sustainable Development, awarded in 2024. They are a Certified Delivery Partner of "Zero Bills" by Octopus Energy, while Zed Pods' manufacturing business holds B-Corp Certification - a designation demonstrating that a business is meeting high standards of verified performance, accountability, and transparency on factors ranging from employee benefits and charitable giving to performance, supply chain practices and input materials.



### Design, Architect and Quality

Zed Pods controls the build from design, planning, manufacture and onsite construction.

This is further overseen by the following ISO accreditations:



They have an in-house architectural design team with the following accreditation and registrations:

- CIAT (Chartered Institute of Architectural Technologists)
- RIBA (Royal Institute of British Architects)

Their residential build system has an in-depth and independently verified structurally engineered approach as set out below. This includes all the current and proposed systems in use of Mid Devon Housing schemes.

Zeds are also now an ISO 19650 organisation ((LRQA accredited). ISO 19650 is an international standard that enables the secure management of information across the entire lifecycle of a built asset using Building Information Modelling (BIM). It follows the same principles and requirements as the UK BIM Framework and is closely aligned with the existing BS 1192 standards. One of the key benefits of BIM is that it provides clients with a “digital asset”, enabling a fully traceable “Golden Thread of Information”. This supports streamlined access to information, cost-effective proactive maintenance, and reduced downtime for repair works.



### **Engineering and durability**

Zed Pod engineers are CEng, MISTRUCTE, MICE accredited personnel (Chartered Engineer, Member of the Institution of Structural Engineers and Member of the Institution respectively). They are also Approved Certifiers of Design (Building Structures) and cover all aspects of the building structure. They further hold SCI membership and ICW accreditation (Steel Construction Institute and Insurance Company of the West respectively).

The Zed Pod modules have been fully engineered for snow and wind loads in multiple exposure locations in the UK.

Their residential designs are a certified building system developed and tested by the Building Research Establishment (BRE).

This is backed up by accreditation with BOPAS (The Build offsite Property Assurance Scheme) which includes the steel frame systems used on all Mid Devon schemes which holds a minimum durability assessment of 60 years.

Zed Pods also holds the industry leading ICW Endorsed accreditation. This follows a rigorous technical assessment of the Zed Pods build system to ensure it meets ICW's stringent technical requirements. ICW Endorsed is a bespoke accreditation scheme for Modern Methods of Construction (MMC) offsite systems for use in conjunction with ICW A-rated structural warranties.

All Zed Pod modules supplied to the Council have triple-glazed windows and doors. These last up to three times longer than standard uPVC units, offering significant long-term maintenance savings.

The modular units exclusively use copper pipes instead of plastic, as copper is known for its strength and longevity - often lasting several decades

### **Safety and performance**

All schemes completed hold full planning permission and have full Building Control approval and sign-off prior to occupation.

In addition to those engineering and durability standards set out above, in terms of specific safety and performance:

**Energy** – all building provided to Mid Devon are EPC A+ Highly Efficient Buildings: super-insulated, air tight homes with minimal energy demands (ENE1 9 or 10 credits under the Standard Assessment Procedure or SAP). The design incorporates the lowest running costs and modern low-carbon technologies ensuring ultra-low energy consumption and cheaper running costs, with solar panels to generate renewable electricity in the day, quiet running heat pumps for low energy heating, controlled ventilation which recovers usable heat from inside the building whilst bringing in the fresh air.

**Space standards** – all residential schemes meet the nationally described space standards. As the formal Principal Designer and developer, Zed Pods are responsible for incorporating this into each building design and this is checked by MDCC Development Control at Planning Approval stage to ensure the minimum standards are met. Post-completion, as built measurements have been taken at several schemes to further verify compliance.

**Fire** – all the Zed Pods buildings and construction processes meet or exceed the 2022 Building Safety Act requirements. Under their build system all materials used are A-rated for fire and have full fire stopping logs in compliance with the “golden thread”, enhanced by digital technology and record keeping. All materials carry performance declarations and/or BBA certificates. All our modules use stone wool insulation (A-rated) and their modules have never used combustible insulation materials or cladding. The party walls are fire resistant up to 60 minutes on both sides of the wall, effectively giving the modules 120 minutes before a fire in one module would break through to the next. This is well above the requirements under building regulations.

The modular units use only fire-rated plasterboards and certified fire doors throughout the buildings to enhance fire protection and withstand heavy use.

In addition, the homes in Mid Devon include remote monitored AICO sensors for smoke heat and moisture detectors to provide an extra layer of monitored fire safety.

**Overheating** – all Zed Pods buildings exceed Building Regulation Part ‘O’ requirements and include both passive and active cooling technologies where required. This includes Dynamic Thermal Modelling assessments as required

following the full Chartered Institution of Building Services Engineers (CIBSE) TM59 Design methodology.

**Mould risk** - mould risk has been carefully considered. As a social housing provider, we must comply with all regulatory standards including new, stringent requirements under Awaab's Law. As such, this has been a key design consideration to ensure that our new modular building future-proofed and mould protection is built-in. Fully breathable walls prevent moisture build-up without compromising airtightness or thermal performance. The Mechanical Ventilation with Heat Recovery (MVHR) linked heating and ventilation systems prevent the mechanical ventilation being switched off so the buildings are continually ventilated in a controlled manner. Zed Pods have had buildings in constant occupation since 2020 without any issues.

**RAAC** - reinforced autoclaved aerated concrete (RAAC). RAAC material have been widely publicised in recent years due the failure of the material in public buildings including schools and hospitals were expensive building remediation or replacement has been required.

It was used mostly 1950s and 1990s as a cheaper alternative to standard concrete that was quicker to produce and easier to install. However, it is less durable and has a lifespan of around 30 year with a structural behaviour differs significantly from traditional reinforced concrete.

No RAAC has ever been used in Zed Pods buildings or homes.

### **Other specification and social value**

**Acoustic performance** – high performance acoustic rated insulation materials, high performance glazing (inc. triple glazing) and enhanced party wall details create exceptional, above traditional build standard acoustic attenuation

**Neurodiversity** - together the enhanced energy specification performance as set out above, the acoustic performance and high levels of natural lighting bring benefits for neurodiverse tenants.

**Healthy living** - no toxic materials with be used and no urea-based insulation systems deployed with low VOC paints and adhesives, vapour-permeable, breathing wall construction.

**Prisoners Building Homes Programme** - Zed Pods are the largest employer within the PBH. 31 day-release inmates have worked so far in the Zed Pods factory which is a third of the workforce. National living wage paid where up to 35% goes to Victim Support and remaining wages are held in trust for prisoners on release to support rehabilitation, employment and accommodation. Prisoners are upskilled; NVQ's, Forklift/ Scissor Lift skillset with wraparound support including mental health. This provides them with core employment skills for the future and overall Zed Pods reoffending rate under 3% against a national average of between 25-50%. The Ministry of Justice have estimated that for every £ spent gives a £3 return.

Engagement with PBH has meant Mid Devon have recently been able to access additional grant funding from the Ministry of Housing, Communities and Local Government towards specific development schemes, reducing net costs further.



**Considerate Constructors** – all Mid Devon Zed Pods projects have been managed under accreditation to the Considerate Constructors scheme. This includes meeting the Code of Considerate Practice which embodies the high standards the industry can and should achieve. There are clear, attainable guidelines in the Code that help Zed Pods and its sub-contractors make positive changes to the way they work including managing the impact on neighbours and the public, minimising or enhancing environmental impact and valuing the workforce through a supportive, inclusive, and healthy workplace.



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MDH Honiton Rd Culmpton (CA183 tendered, contract pending)		
Outline specification		Order Value
Build type	TRADITIONAL BUILD	
EPC rating	B	
Op Net-Zero carbon	No	
Demolition and ACM removal	Yes/limited	
Additional infrastructure	No	
Other Notes	No	
Planning consultant		£10,271.00
Planning consultant		£950.00
Planning consultant		£2,500.00
Planning consultant		£2,495.00
Planning consultant		£1,700.00
Planning consultant		£80.00
External legal		£1,750.00
Direct Oncosts for procurement and contract mgt		£9,654.33
Demolition and ACM remove/disposal		£19,453.85
Average bid before tender scoring/award		£396,000.00
Total Spend		£444,854.18
Average cost per 2 Bed Unit		£222,427.09
Funding	None	£0.00
Average NET cost per 2 Bed Unit		£222,427.09
Average NET cost all Units		£222,427.09
NET cost per m2		£3,110.87

MDH Crofts Estate, Sandford (CA164)		
Outline specification		Order Value
Build type	Zed Pods MMC MODULAR	
EPC rating	A+	
Op Net-Zero carbon	Yes	
Demolition and ACM removal	Yes	
Additional infrastructure	No	
Other Notes	No	
Demolition and ACM remove/disposal		£53,400.00
ZedPods		£1,440,305.48
5 x 1 Bed Flats		
Average cost per 1 Bed Unit		£298,741.09
Funding	BLRF2	-£100,000.00
HE AHP		-£506,305.00
Average NET cost per Unit		£887,400.48
Average NET cost all Units		£147,900.08
NET cost per m2		£3,321.36

MDH Shapland Place, Tiverton (CA154)		
Supplier		Order Value
Outline specification		
Build type	Zed Pods MMC MODULAR	
EPC rating	A+	
Op Net-Zero carbon	Yes	
Demolition and ACM removal	Yes	
Additional infrastructure	Yes (wider SUDs, flood attenuation, additional parking, EV)	
Other Notes	Yes, planters and mature planting, revised balcony screens	
ZedPods		£2,030,233.22
Demolition and ACM remove/disposal		£82,228.81
4 x 1 Bed Flats		
3 x 2 Bed Flats		
1 x 3 Bed Flats		
Average cost per all Units		£264,057.75
Funding	BLRF2	-£160,000.00
HE AHP		-£692,000.00
Average NET cost all Units		£157,557.76
NET cost per m2		£2,874.49

Bristol City Council New Kingsland		
Item/supplier		Order Value
Outline specification		
Build type	TRADITIONAL BUILD	
EPC rating	B	
Op Net-Zero carbon	No	
Demolition and ACM removal	Yes	
Additional infrastructure	Unknown	
Other Notes	Unknown	
Total scheme cost		£4,951,635.00
7 x 1 Bed Flats		
4 x 2 Bed Houses		
6 x 3 Bed Houses		
Average cost all units (no breakdown data available)		£309,477.19
Funding	HE AHP	-£1,600,000.00
Average NET cost all Units		£209,477.19
Est. NET cost per m2		£3,724.04



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## **Annex C Mid Devon District Council/Zed Pods Development Awards**

**2023-24**

### **St Andrews House:**

#### **Winner (5 in total):**

1. CN Specialist Awards: Project of the Year by a Specialist Contractor (subcontract up to £2m)
2. Construction Excellence CESW: Building Project of the Year (Up To £5M)
3. Construction Excellence CESW: Climate Action
4. Brownfield Awards: Best Public Sector Brownfield Project
5. BCIA Awards: Carbon Net Zero Initiative of the Year

#### **Finalist (9 in total):**

1. BCIA Awards: Residential Project of the Year
2. Unlock Net Zero: Building or development of the year
3. Inside Housing Awards: Best affordable housing development
4. Inside Housing Awards: Best healthy homes development
5. CN Awards: Low Carbon Project of the Year
6. Construction Excellence CESW: Residential Project of the Year (Up To £5M)
7. Offsite Awards: Social Housing Project of the Year
8. Brownfield Awards: Best Sustainable Brownfield Scheme
9. Building Innovation Awards: Most Innovative Affordable Housing Project

### **Shapland Place:**

#### **Finalist (1 in total):**

1. Construction Excellence CESW: Modern Methods of Construction

**2025 to date**

### **Shapland Place:**

#### **Finalist (3 in total) – winners to be announced:**

1. Construction Excellence CESW: Delivering Value
2. Construction Excellence CESW: Environmental, social and governance
3. Construction Excellence CESW: MMC

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ZED PODS Limited

# Social Value Impact Economic Appraisal Report

Z  
PO  
DS

In partnership with

Project: St Andrews House, Cullompton

March 2025

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# 1 Overview

Economic appraisals form a critical part of the HMT Green Book business case methodology (being the standard approach adopted by local authorities and the public sector when seeking approval for their capital projects).

Public sector landlords require a robust evidence base to demonstrate the social impact of their development projects and evidence the wide-ranging benefits that a partnership with ZED PODS can achieve in designing and building zero-operational carbon MMC-led new developments.

The purpose of this economic appraisal is to appraise the social, environmental and economic costs, benefits and risks for the options of a project and identify the option most likely to offer the best social value for delivery of the project.

By preparing an economic appraisal that demonstrates, quantifies, and monetises the benefits of using ZED PODS housing solutions, alongside the whole lifecycle costs and reduced risks of the product, this robust evidence base will support public sector landlords in the development of their business cases for the project and demonstrate the best social value for money option when compared to other possibilities.

This economic appraisal following Green-Book methodology model has been prepared by Global City Futures, who are a team of Better Business Case Practitioner Accredited consultants (the Government's gold standard training accreditation) working in partnership with ZED PODS Limited.

# 2 Background

ZED PODS deliver revolutionary cost-effective, eco-friendly, affordable housing solutions through the utilisation of volumetric offsite MMC technology. Predominantly partnering with local authorities and other public sector organisations, ZED PODS look to not only optimise the use of underutilised and constrained public sector land but also keep the lowest possible utility and lifetime costs.

This social value economic model aims to quantify and detail the wider social benefits that are delivered both in implementation and through the lifecycle of the ZED PODS product. This will support Local Authorities to navigate their governance and approval processes by generating an output that can be used to inform the Economic Appraisal.

## 3 Social Impact

A partnership with ZED PODS will have a wide range of positive effects on communities, individuals, and society at large, which can be demonstrated by this social impact economic model. The output of the economic model is a dashboard which provides a snapshot of the overall social impact of the project.

### 3.1 The Economic Appraisal

ZED PODS' bespoke economic appraisal model helps public sector landlords to identify and quantify the benefits arising from a development project. The model provides a robust evidence base to demonstrate the social impact and the wide-ranging benefits that a partnership with ZED PODS achieves. The economic appraisal conducted includes the four benefit classes as laid out in HM Treasury guidelines:

- 1. Cash Releasing Benefits**
- 2. Non-Cash Releasing Benefits**
- 3. Societal Benefits**
- 4. Unmonetisable Benefits**

When assessing the benefits of a project or policy, the HMT Green Book categorises them into four main types:

#### **1. Cash-Releasing Benefits**

These benefits result in direct financial savings that can be reinvested or used elsewhere. They involve actual reductions in expenditure, such as:

- Lower operating costs from energy efficiency measures
- A reduction in staff costs due to automation
- Savings from reduced procurement costs

These are tangible and measurable in monetary terms, directly impacting budgets.

#### **2. Non-Cash-Releasing Benefits**

These benefits generate efficiencies or cost savings, but they don't immediately free up cash for other uses. Instead, they may allow organisations to do more with the same resources. Examples include:

- Increased productivity from improved processes
- Reduced maintenance needs extending asset life
- Time savings for staff, allowing them to focus on other tasks

While they improve value for money, they don't necessarily translate into direct budget savings.



### 3. Societal Benefits

These are broader benefits that improve social and economic well-being, often affecting communities, businesses, and the environment. Examples include:

- Reduced carbon emissions improving public health
- Increased employment opportunities supporting local economies
- Better living conditions that contribute to enhanced wellbeing

These benefits often justify public investment, even if they don't directly impact government budgets.

### 4. Unmonetisable or Qualitative Benefits

Some benefits are difficult to quantify in financial terms but are still important for decision-making. These include:

- Improved quality of life or well-being
- Increased biodiversity from environmental initiatives
- Enhanced reputation or public trust in government services

While harder to measure, these benefits should be considered alongside financial impacts when evaluating a project's overall value.

#### 3.1.1 Discounting in Economic Appraisal

When evaluating a project or investment, we need to compare costs and benefits that occur at different points in time. However, money today is worth more than the same amount in the future due to factors like inflation, risk, and the opportunity cost of capital. Cost discounting helps us fairly compare future costs and benefits by adjusting them to reflect their present value. The key reasons for Using Cost Discounting are:

- ❖ **Reflecting Time Value of Money**
  - A pound today can be invested and grow over time, making it more valuable than the same pound received years later.
  - Discounting adjusts future values to account for this, ensuring fair comparisons.
- ❖ **Accounting for Risk and Uncertainty**
  - The further into the future a cost or benefit occurs, the greater the uncertainty.
  - Discounting reduces the weight of future values to reflect this risk.
- ❖ **Supporting Better Decision-Making**
  - Helps policymakers and businesses choose options that deliver the best long-term value.
  - Ensures that projects with early, high-value benefits are not treated the same as those with delayed or uncertain returns.

## How It Works

A discount rate is applied to future costs and benefits, reducing their value to what they would be worth today (Present Value). This ensures that long-term investments are appraised in a way that reflects real economic value. By using cost discounting, we make more informed and efficient investment decisions, ensuring public funds and business resources are used wisely.

## 4 Dashboard

From the economic model a dashboard has been developed to highlight the benefits of the project **"St Andrews House"**, which can be seen in Figure 1 below.

Location St. Andrews Estate, Cullompton, EX15 1JA

Client: Mid Devon District Council (MDDC)

Principal Contractor: ZED PODS Limited

Architect: ZED PODS Limited

Scope of works: Full turnkey package RIBA stages 0-7 undertaken by Zed Pods Limited

Project Description: St Andrews House, a pioneering six-unit zero-operational-carbon, social-rented modular homes on a challenging council-owned brownfield site (garage site) in Cullompton using Volumetric Modular Construction (Category 1).

Start Date (Design & Planning): August 2021

Start Date (Built phase) Summer 2023

Completion Date: Spring 2024

Figure 1 Model Dashboard

Ze d Pods Housing Model Benefits Appraisal

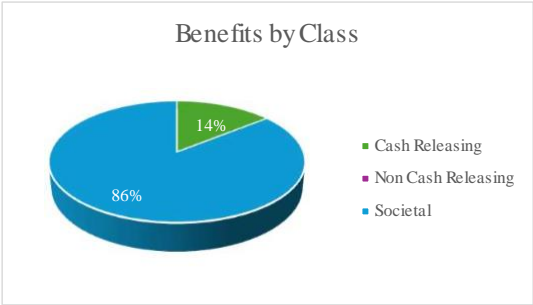
St Andrews

Project Details	
Region	South West
Development Start Year	2023
Practical Completion Year	2024
Acquisition Costs	£0
Development Costs	£1,000,000
Size Area (Ha)	0
Number of Units	6

Benefits

Total Discounted Benefits	£8,154,809
---------------------------	------------

Benefit Class	Total	Total Discounted Benefits
Cash Releasing	£2,672,949	£1,164,562
Non Cash Releasing	£0	£0
Societal	£16,347,777	£6,990,247
Unmonetisable	£0	£0
Total	£19,020,726	£8,154,809



Metric

Total Discounted Benefits	£8,154,809
Total Discounted Costs (assumed incurred Yr 0)	£1,000,000
Benefit / Cost Ratio	8.15
Net Present Social Value	£7,154,809
Payback Year	2028

Unmonetisable Benefits

Climate Resilience  
Improvement of anti-social behaviour and increased community cohesion  
Efficiencies in regard to brownfield site management  
Provision of low carbon living training to residents

### 5.1 GMCA Cost Benefit Analysis (CBA) Model

<https://www.greatermanchester-ca.gov.uk/what-we-do/research/research-cost-benefit-analysis/>

## 5.2 Land Value Estimates

Source Indexation: <https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>

### 5.3 Carbon Valuation

<https://www.gov.uk/government/publications/valuing-greenhouse-gas-emissions-in-policy-appraisal/valuation-of-greenhouse-gas-emissions-for-policy-appraisal-and-evaluation#annex-1-carbon-values-in-2020-prices-per-tonne-of-co2>

#### 5.4 Quality Adjusted Life Years (QALY)

#### 5.4.1 Source Green Book QALY Valuation:

**Description:** Monetary valuations of QALYs are available for the UK. The current monetary Willingness-to-Pay (WTP) value for a QALY is £74,000 in 24/25 prices. Further information on the basis for the value of a QALY can be obtained by contacting the Department of Health and Social Care. The amount of Value of a QALY effects should be discounted at the health rate of 1.5%, declining after 30 years. The value of 0.084 represents the improvement in Pain/Discomfort from Moderate to No Problem resulting from access to warm accommodation.

#### 5.4.2 Source QALY calculation:

<https://www.gov.uk/guidance/cost-utility-analysis-health-economic-studies>

**Description:** "QALYs attempt to combine the effects of your product on both mortality (how long people live for) and morbidity (how well people are). One QALY represents one year of life in full health. To calculate QALYs, you will need to measure:

- life years
- health-related quality of life (HRQL or QoL)

Life years are estimates of how far an intervention extends life. HRQL reflects an individual's perceptions of their own health, shown as specific health states or dimensions."

#### 5.4.3 Source HRQL measure:

[https://euroqol.org/wp-content/uploads/2024/01/ENG\\_value-set\\_STATA.txt](https://euroqol.org/wp-content/uploads/2024/01/ENG_value-set_STATA.txt)

**Description:** "Measures QoL in 5 dimensions: mobility, ability to self-care, ability to carry out usual activities, pain/discomfort. Each dimension is rated at one of 5 levels: no problems / slight problems / moderate problems / severe problems / extreme problems or unable."

### 5.5 WELLBY

**Source:**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005388/Wellbeing\\_guidance\\_for\\_appraisal\\_-\\_supplementary\\_Green\\_Book\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005388/Wellbeing_guidance_for_appraisal_-_supplementary_Green_Book_guidance.pdf)

<https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/datasets/personalwellbeingandprotectedcharacteristics>

<https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/methodologies/personalwellbeingfrequentlyaskedquestions>

**Description:** WELLBY assesses the wellbeing impact for an individual. Improvements in the measurement of wellbeing measurement in the second half of the twentieth century have enabled consideration of wellbeing as part of the microeconomics of social welfare.

### 5.6 Prisoners Building Homes Programme

**Source:**

<https://www.gov.uk/government/statistics/proven-reoffending-statistics-january-to-march-2022/proven-reoffending-statistics-january-to-march-2022>

**Description:** Data shows the national reoffending rate, ranging from 25.1% to 55.5%.

**Source:** <https://bristoltogether.co.uk/social-impact/>

**Description:** Bristol Together CIC (an employer on the Programme and established in 2011 with the specific goal of employing and training ex-offenders) have supported over 130 former prisoners into employment

through their work and have seen a reoffending rate of less than 10% for prisoners employed under their organisation

**Source:**

<https://www.fpe.org.uk/the-cost-of-prisons/>

**Description:** For 2021/22, the process costs of imprisoning someone typically costs £65,000

**Source:**

<costs-per-prisoner-individual-prison-2022-2023.ods>

**Description:** For 2022/23, once inside prison, the estimated cost of a prison place is £51,108 per year

**Source Indexation:**

<https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>

**Description:** To inflate the MHCLG values from to the 2024 base year.

## 5.7 Cost of Retrofit

**Source:**

<The-costs-and-benefits-of-tighter-standards-for-new-buildings-Currie-Brown-and-AECOM.pdf>

**Description:** A report for the Committee on Climate Change

## 5.8 Fuel Poverty

**Source:**

<https://assets.publishing.service.gov.uk/media/65ccebba1d939500129466a9/annual-fuel-poverty-statistics-report-2024.pdf>

**Description:** 13% of households in fuel poverty

## 5.9 Roles in Construction

**Source:**

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/averageweeklyearningsbyindustryyear03>

**Description:** Average earning ONS - roles in Construction



## **Report for:** HOMES POLICY DEVELOPMENT GROUP

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Date of Meeting:	3 <sup>rd</sup> June 2025
Subject:	<b>MID DEVON HOUSING (MDH) SERVICE DELIVERY REPORT FOR Q4 AND OUTTURN 2024-25</b>
Cabinet Member:	Councillor Jane Lock, Cabinet Member for Housing, Assets and Property
Responsible Officer:	Simon Newcombe, Head of Housing and Health
Exempt:	None
Wards Affected:	All wards
Enclosures:	<p>Annex A: Tenant Satisfaction Measures (TSMs) – performance data for 2024-25: Quarters 1, 2, 3, 4 and end of year outturn</p> <p>Annex B: Tenancy Enforcement Activities – performance data for 2024-25: Quarters 1, 2, 3, 4 and end of year outturn</p> <p>Annex C: Rent Recovery – performance data for 2023-24: Quarters 1, 2, 3, 4 and end of year outturn</p> <p>Annex D: Building Repairs and Maintenance – performance data for 2024-25: Quarters 1, 2, 3, 4 and end of year outturn</p>

### **Section 1 – Summary and Recommendation(s)**

This report has been presented in support of a previous commitment to provide a quarterly update to Members on activity undertaken by Mid Devon Housing (MDH), including some relating to enforcement.

It also contains relevant information relating to performance as measured in line with the guidance relating to the Tenant Satisfaction Measures (TSMs). The Regulator of Social Housing (RSH) requires registered providers of social housing (RPs) to provide

a report on a set of TSMs which includes perception and performance data, and 2024/25 is the second year in which MDH and all other providers have to do so.

The aim of this report is to provide an update on relevant data, some of which is required as part of the TSM submission, where available, in order to provide assurance. It is hoped that the data will also provide some indication of the final outturn expected at the end of the year.

### **Recommendation(s):**

**That the PDG notes the outturn performance for Quarter 4 and end of year 2024/25 as provided in Annexes A, B, C and D**

## **Section 2 – Report**

### **1 Introduction**

- 1.1. MDH has approximately 3,000 homes in its management located across the District.
- 1.2. This report provides a summary of activity and performance for Q4 ending 31 March 2025 and the previously reported data for Q1, Q2 and Q3 for comparison.
- 1.3. In accordance with this, data for Quarters 1, 2, 3 and 4 including the overall end of year outturn for 2024-254 is provided on the following Annexes:
  - Annex A: Tenant Satisfaction Measures (TSMs)
  - Annex B: Tenancy Enforcement Activities
  - Annex C: Rent recovery
  - Annex D: Building Repairs & Maintenance

### **2 Assurance requirements and reporting**

- 2.1 RPs are now required by the RSH to provide effective assurance to Members and this should include relevant, updated performance data relating to service delivery.
- 2.2 The RSH takes a co-regulatory approach which means that Members are responsible for ensuring that MDH is meeting their standards. There are currently 4 consumer standards which were recently implemented following the implementation of the Social Housing (Regulation) Act 2023. Currently, RPs such as MDH are expected to have due regard to the required outcomes and specific expectations as set out in these standards, which are:
  - The Safety and Quality Standard
  - The Tenancy Standard
  - The Transparency, Influence and Accountability Standard
  - The Neighbourhood & Community Standard



- 2.3 The Rent Standard, an economic standard, also applies and MDH is required to have regard to this.
- 2.4 Members also have a responsibility to ensure that MDH is being open and accountable with regard to how the organisation meets its objectives. In line with the principles of co-regulation, RPs are also required to support tenants so that they can shape and scrutinise service delivery and hold Members to account.
- 2.5 Performance data recorded in support of the TSMs is shown in the report. The aim is to ensure that Members can be reassured that data is being collected. Some of the data in this report will be included in the data submission which will be made to the RSH by the 30<sup>th</sup> June 2025.
- 2.6 Perception data to inform our return to the RSH, in line with the new regulatory requirement, is collected quarterly, although MDH may review our approach to this. Information is collected by a third party contractor. In 2024-2025, data was collected in quarters 2, 3 and 4 due to contractual delays. In 2025-2026, data will be collected in quarters 1, 2, 3 and 4.
- 2.7 During the survey, individual tenants were given an opportunity to provide limited feedback in response to some questions and were able to do this anonymously, if they wanted. Many tenants chose to give their name and address and Officers have followed up on the previous quarterly data and are currently working through Q4 comments.
- 2.8 This work was procured by a partnership involving MDH and two other local authority providers with retained housing stock. As a result, there will be opportunities for local benchmarking alongside national benchmarking once all RSH has collected all relevant data and it has been published, provided that all partners wish to participate in this.
- 2.9 Work is now ongoing with regard to a procurement process involving all three local authorities in respect of the survey required this year, 2025/26. It is expected that the same contractor will be used.
- 2.10 The work of different teams within MDH is shown in the annexes as set out below. Information is provided on key areas of work. It is important for Members to be assured that the homes in management are safe and secure and to understand how teams are performing in relation to certain indicators relating to tenancy and estate management. There are legislative and regulatory requirements which RPs must adhere to. However, it is also important that service delivery also takes account of MDH's own policies and good practice.

2.11 This service delivery report sets out the following specific data:

- 12 performance data TSMs
- 10 perception survey data TSMs (annual survey data)
- Tenancy enforcement data
- Rent collection and debt data
- Full repairs data including Decent Homes
- Voids data (metrics determined by updated Voids Management Policy)

2.12 The TSMs include three measures designed to demonstrate how RPs are performing with regard to service delivery in connection with complaints. If a tenant remains dissatisfied following the conclusion of their complaint, they can escalate that complaint to the Housing Ombudsman Service (HOS). In the new regulatory framework, recently introduced, the role of the HOS has been expanded. Every year, RPs must undertake a review of compliance against the Complaints Handling Code, issued by the HOS. There is now also a requirement to submit an annual complaints performance and service improvement report to the PDG, in support of this. This report is on the agenda for this meeting.

2.13 In addition, it should be noted that there is a Memorandum of Understanding between the HOS and the RSH which allows the transfer of information with the aim of ensuring that any regulatory failings associated with service delivery as performed by RPs are identified and dealt with in the most appropriate way.

2.14 MDH provides a detailed report on complaints data and key issues of learning to inform service improvement on an annual basis. The latest annual report is provided as a separate agenda item for this meeting. As required, this report will be published on the section of the website relating to complaints alongside the response of the PDG and the Cabinet to this.

### **3 Performance and context**

3.1 Annexes A to D contain comments and informative narrative on performance provided against specific metrics and there is further context provided below.

3.2 The results of the 2024/25 TSM results will be published on the website in due course. However, it is important to note that the results increased for each TSM question compared to 2023/24. The smallest increase was +3.4% for how the tenant feels their landlord listens and acts. The biggest increase was for how satisfied tenants are with their communal areas, this raised by +15.7%.

3.3 MDH will focus on any TSM results where the score was 60% or less. There were three TSMs which fell below 60%. These were; satisfaction with the landlords approach to anti-social behaviour (56%), satisfaction with how the

landlord listens and acts (54%) and satisfaction with the approach to complaint handling (37%).

3.4 A total of 2,818 tenants were eligible to respond to the survey. The total sample size achieved was 519. The methodology used by our contractor was in line with the relevant regulatory requirements. Mixed methods were used to collect the responses with the following results:

- Telephone survey 410 respondents
- Online survey 109 respondents

3.5 Representative checks were carried out to ensure that the survey was representative of the tenant population as a whole. The characteristics by which representativeness was determined were:

### Tenancy Type

FLEXI 2  
FLEXI 5  
Introductory Tenancy  
Secure

Population	Sample
1%	1%
15%	15%
4%	3%
80%	81%

### Ward

Bradninch  
Cadbury  
Canonsleigh  
Clare & Shuttern  
Crediton Boniface  
Crediton Lawrence  
Cullompton Padbrook  
Cullompton St. Andrews  
Cullompton Vale  
Halberton  
Lower Culm  
Sandford & Creedy  
Silverton  
Taw Vale  
Tiverton Castle  
Tiverton Cranmore  
Tiverton Lowman

Population	Sample
4%	4%
1%	1%
2%	3%
3%	3%
7%	7%
3%	3%
2%	1%
7%	7%
0%	0%
2%	1%
8%	8%
4%	4%
2%	2%
3%	3%
1%	1%
7%	7%
15%	15%

Tiverton Westexe  
Upper Culm  
Upper Yeo & Taw  
Way  
Yeo

18%	18%
3%	3%
4%	5%
1%	1%
3%	3%

### Length of Tenancy

< 1 year  
1 - 3 years  
4 - 5 years  
6 - 10 years  
11 - 20 years  
Over 20 years

Population	Sample
7%	4%
19%	21%
11%	12%
19%	21%
21%	21%
23%	21%

### Age Group

0 - 24  
25 - 34  
35 - 44  
45 - 54  
55 - 59  
60 - 64  
65 - 74  
75 - 84  
85 +

Population	Sample
2%	1%
11%	10%
16%	16%
15%	15%
10%	9%
10%	10%
17%	18%
13%	14%
6%	6%

### Property Type

Bedsit  
Bungalow  
Flat  
House  
Maisonette

Population	Sample
0%	0%
34%	37%
19%	17%
46%	46%
0%	0%

### Gender

Female  
Male

Population	Sample
61%	62%
39%	38%

- 3.7 MDH team leaders meet with senior managers on a monthly basis to discuss performance against a range of indicators across the business. This delivers a greater understanding and insight and ensures that performance is routinely monitored which in turn delivers an understanding of any pressures. This informs the allocation of resources, as appropriate.

## **4 Building Services**

- 4.1 Performance relating to this area of work is dependent upon having a full complement of operatives who have the necessary skills to manage the workload. Unfortunately, there were some challenges with regard to recruitment last year due to prevailing market conditions. This, combined with issues such as long term sickness, can have an impact on the ability of the team to manage the priorities. For this reason, priority was given to completing the most urgent works to ensure that they were completed on time, as well as to those routine repairs having the most impact upon tenants. Similar issues also affected the administrative team responsible for processing repairs requests. Taking these resourcing issues into account, managers are satisfied that with the level of performance, especially as targets have been met, although, there is, of course, always room for improvement to ensure that 100% of repairs are completed on time.
- 4.2 Customer satisfaction with planned maintenance remains strong despite some challenging performance issues associated with a very limited number of contractors.

## **5 Building Services – Voids Specific**

- 5.1 The team which manages this work has been busy this year managing a large number of voids in both the housing revenue account and on behalf of the general fund strategic housing functions. The condition of the properties being returned has, on occasions, been poor, and it is a combination of these factors which has impacted the ability of the team to achieve set targets. Standard and major voids have been prioritised in order to ensure that the supply of available homes is maintained. However, some work, including that relating to decarbonisation, has taken longer than hoped due to external resourcing issues and therefore the target relating to the turnaround time for these properties was missed.

## **6 Tenancy and Estate Management**

- 6.1 The Neighbourhood team works in partnership with other agencies to manage tenancy-related issues and those on the MDH estates, including anti-social behaviour. A new Officer was recruited and commenced work at the beginning of May 2024, although, the team has still faced periods of staff absence. The

team is now back up to full capacity in regards to Neighbourhood Officers, however the apprentice supporting the team has now moved over into the rent corrections team, which will impact the Neighbourhood Officers in terms of admin support. Annex 2 shows performance with regard to some of the tools available to the team. Many of these can be used to support the management of reports of nuisance and anti-social behaviour.

- 6.2 In line with good practice, our Officers aim to address reported issues at the earliest opportunity. This may involve a variety of approaches, such as collaborative working with partner agencies, informal mediation by team members or referrals for formal mediation where appropriate. As a result, the data presented may not fully capture the breadth and complexity of the work involved in managing cases of nuisance and anti-social behaviour.
- 6.3 Addressing tenancy fraud remains a key priority, which is reflected through the higher cases logged in 24/25 (6 cases) compared to 23/24 (4 cases). All cases in 24/25 were referred to an external investigator. This type of fraud can take various forms, but fundamentally, when a property is occupied by someone who does not have a legal right to reside there, it reduces the availability of housing for those in genuine need. To safeguard housing resources, Officers take a proactive approach by promptly investigating any concerns raised and making appropriate referrals for further investigation and action where necessary.

## **7 Income Collection**

- 7.1 The Income Neighbourhood team reduced the level of debt attributed to current dwelling tenants from 2.22% in Q1 to 1.55% by close of Q4. This outturn is well within the target of <5%. This compares to 2.21% in 23/24 and is particularly encouraging given the in-year rent error judgement and pressure to support the resolution of the historic formula rent issue whilst managing a cohort of tenants challenging MDH on their rent and rent payment position, especially those tenants we have overcharged. The team continues to engage with tenants and supports those that may be experiencing financial difficulties.
- 7.2 In managing rent arrears, the team adopts a supportive and empathetic approach, working proactively with tenants to address any financial difficulties they may be facing. Tenants are encouraged to engage with the service, and where appropriate, are offered referrals to debt counselling and money advice services. The overarching goal is to foster a culture where all tenants are supported in maintaining their rent payments. To help achieve this, the team provides realistic and manageable repayment plans tailored to their individual circumstances.

## **8 Recommendation**

- 8.1 The following recommendation is made:

**That the PDG notes the outturn performance for Quarter 4 and the end of year outturn 2024-25 as provided in the Annexes A, B, C and D.**

### **Financial Implications**

The activity of MDH is funded through the Housing Revenue Account (HRA). The HRA is ring fenced and subject to specific financial controls. The Housing Ombudsman Service (HOS) charges a mandatory membership fee based on the number of homes in the management of the registered provider (RP) of social housing.

### **Legal Implications**

The tenancy agreement defines MDH's relationship with tenants and sets out the rights and responsibilities of both parties. This takes account of legal and regulatory requirements. The Council is an RP and therefore is required to comply with the regulatory framework operated by the RSH. The regulatory framework has been reviewed. The Transparency, Influence and Accountability Standard contains provisions relating to the management of complaints. There is also a requirement for MDH to manage complaints in accordance with the Complaints Handling Code (the Code) which is issued by the HOS. Landlords are expected to self-assess against the Code. Landlords are required to use the learning from complaints to drive service improvement. Following publication of the Social Housing White Paper in late 2020, the Social Housing Regulation Act 2023, has now been implemented and gone into statute.

### **Risk Assessment**

The Council has approximately 3,000 homes in management and the performance of MDH impacts upon the lives of many thousands of tenants and their families. This represents a huge responsibility and investment, consequently a major area of risk. Not providing an effective housing management service has the potential to result in failure to meet legal and statutory obligations including those relating to health and safety issues, repairs obligations, tenancy fraud, and reputational issues which could result in our tenants feeling stigmatised. Failure to collect rental income could impact the ability to fund necessary management and maintenance activities.

Finally, a failure to provide adequate information on service performance for the purposes of governance and scrutiny is a specific area of non-compliance with the requirements of the RSH. This regulator has new powers to impose performance improvements and potentially fine registered providers where performance is poor and/or adequate assurance is not provided.

### **Impact on Climate Change**

None directly arising from this report.

### **Equalities Impact Assessment**

MDH has a collection of housing related policies. The use of these helps to ensure that service delivery is consistent and fair. These are currently being reviewed with the

aim of aligning them more closely with the Regulatory Standards. There is a regulatory requirement for registered providers of social housing to tailor their services to meet the needs of tenants. MDH requests diversity data from tenants to enable compliance to be monitored. MDH is required to work with people from all sections of society and having an agreed policy ensures that all tenants and other stakeholders are treated in the same way with adjustments being made to meet their needs, as necessary. The Housing Ombudsman Service Complaints Handling Code which MDH adhere to also requires landlords to have an awareness of accessibility so residents are easily be able to access the complaints procedure via several routes.

Our “Getting to Know You” project has been designed to refresh our knowledge relating to the diversity of our tenants and over the next two years, we will be surveying them in an effort to better understand their needs.

### **Relationship to Corporate Plan**

Homes and the Environment are a priority for the Council and this includes increasing the supply of affordable homes in the District and also supporting and growing active tenant engagement

### **Section 3 – Statutory Officer sign-off/mandatory checks**

**Statutory Officer:** Andrew Jarrett

Agreed by or on behalf of the Section 151

**Date:** 22 May 2025

**Statutory Officer:** Maria de Leburne

Agreed on behalf of the Monitoring Officer

**Date:** 22 May 2025

**Chief Officer:** Richard Marsh

Agreed by or on behalf of the Chief Executive/Corporate Director

**Date:** 22 May 2025

**Performance and risk:** Stephen Walford

Agreed by the Chief Executive

**Date:** 22 May 2025

**Cabinet member notified:** Yes

### **Section 4 - Contact Details and Background Papers**

**Contact:** Simon Newcombe, Head of Housing and Health

Email: [snewcombe@middevon.gov.uk](mailto:snewcombe@middevon.gov.uk)

Telephone: 01884 255255



**Background papers:**

Mid Devon Housing Strategies and Policies:

[Procedures, Policies and Strategies - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/procurement-procedures-policies-and-strategies)

The Regulatory Framework for Social Housing:

[Regulatory framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/regulatory-framework-for-social-housing)

Tenant Satisfaction Measures:

[Tenant Satisfaction Measures Standard - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/tenant-satisfaction-measures-standard)

Housing Ombudsman Complaints Handling Code:

[Complaint Handling Code | Housing Ombudsman Service \(housing-ombudsman.org.uk\)](https://www.housing-ombudsman.org.uk/complaint-handling-code)

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## Annex A: Tenant Satisfaction Measures (TSMs) – performance data for 2024/25: Quarters 1, 2, 3 and 4

Overall Satisfaction						
	Q1	Q2	Q3	Q4	YTD	Comments
TP01: Overall satisfaction	N/A	N/A	N/A	N/A	70%	<p>Annual Indicator.</p> <p>This has risen by 7.6% from 23/24. Overall satisfaction across all RPs was 70% in 23/24. National benchmarking data for all Registered Providers of social housing (RPs) will be released later in the year once all providers have submitted their results.</p>

Keeping Properties in Good Repair						
	Q1	Q2	Q3	Q4	YTD	Comments
TP02: Satisfaction with repairs	N/A	N/A	N/A	N/A	72%	<p>Annual Indicator.</p> <p>This has risen by 8.2% from 23/24. Performance is strong and it's positive the results have improved but we recognise there is more to do in terms of satisfaction around Repairs. Repairs satisfaction surveys now take place after each repair, the results of which are positive (78.96% satisfaction) and will lead to further insight into how we can improve performance in this area with tenants having the option to provide more detailed feedback compared to the TSMs.</p> <p>The overall satisfaction with repairs in 23/24 across all RPs was 75%. Benchmarking data for 24/25 will be available later in the year.</p>

TP03: Satisfaction with time taken to complete most recent repair	N/A	N/A	NA	N/A	71%	<p>Annual Indicator.</p> <p>This has risen by 13.5% from 23/24. The overall satisfaction with the time taken to complete the most recent repair across all RPs in 23/24 was 69%. Benchmarking data for 24/25 will be available later in the year.</p>
TP04: Satisfaction that the home is well maintained	N/A	N/A	N/A	N/A	73%	<p>Annual Indicator.</p> <p>This has risen by 7.7% from 23/24. The overall satisfaction that the home is well maintained across all RPs in 23/24 was 70%. Benchmarking data for 24/25 will be available later in the year.</p>
RP01: Proportion of Homes that do not meet the Decent Homes Standard	0.72%	0.89%	1.06%	0.48%	0.48%	<p>Target 0.00%</p> <p>There are 14 properties with access that do not meet the Decent Homes Standard</p>
RP02: Repairs completed within target timescale	98.27%	99.25%	97.26%	97.97%	98.13%	<p>Target 100%</p> <p>This is slightly below last year's score and is reflective of longstanding staff resource issues, with a number of long term vacancies and/or sickness within the operative team. With ongoing issues as such, urgent repairs work is focussed on alongside routine repairs which have the most significant impact on tenants.</p>

Maintaining Building Safety						
	Q1	Q2	Q3	Q4	YTD	Comments
TP05: Satisfaction that the home is safe	N/A	N/A	N/A	N/A	79%	Annual Indicator.  This has risen by 7.4% from 23/24. The overall satisfaction that the home is safe across all RPs in 23/24 was 77%. Benchmarking data for 24/25 will be available later in the year.
BS01: Gas safety checks	100%	100%	99.96%	99.96	99.96%	Target 100%
BS02: Fire safety checks	100%	100%	100%	100%	100%	Target 100% - On target
BS03: Asbestos safety checks	79.53%	82.71%	80.65%	82.31%	82.31%	There is a plan in place to carry out 300 surveys a year and reach the goal of 100% by 2026. This score has risen from 77.64% last year.
BS04: Water safety checks	100%	100%	100%	100%	100%	Target 100% - On target
BS05: Lift safety checks	100%	100%	100%	100&	100%	Target 100% - On target

Respectful and Helpful Engagement						
	Q1	Q2	Q3	Q4	YTD	Comments
TP06: Satisfaction that the landlord listens to tenant views and acts upon them	N/A	N/A	N/A	N/A	54%	Annual Indicator.  This has risen by 3.4% from 23/24. Although the score has risen, this is an area where improvements need to be made. It is also important to note this score is generally lower across all RPs. The overall satisfaction that the landlord listens and acts across all RPs in 23/24

						was 58%. Benchmarking data for 24/25 will be available later in the year.
TP07: Satisfaction that the landlord keeps tenants informed about things that matter to them	N/A	N/A	N/A	N/A	74%	Annual Indicator.  This has risen by 11.8% from 23/24. Work continues in improving communications through a variety of means which has helped inform this score. The overall satisfaction that the landlord keeps tenants informed across all RPs in 23/24 was 65%. Benchmarking data for 24/25 will be available later in the year.
TP08: Agreement that the landlord treats tenants fairly and with respect	N/A	N/A	N/A	N/A	78%	Annual Indicator.  This has risen by 8.2% from 23/24. The overall satisfaction that the landlord treats tenants fairly and with respect across all RPs in 23/24 was 70%. Benchmarking data for 24/25 will be available later in the year.

Effective Handling of Complaints						
	Q1	Q2	Q3	Q4	YTD	Comments
TP09: Satisfaction with the landlord's approach to handling complaints	N/A	N/A	N/A	N/A	37%	Annual Indicator. This has risen by 14.8% from 23/24. Although still a low score, this is the norm across housing providers. The overall satisfaction with the landlord's approach to complaints across all RPs in 23/24 was 35%. Benchmarking data for 24/25 will be available later in the year.

CH01: Complaints relative to the size of the landlord	15	16	20	23	73.2	The number of complaints received each quarter is rising. Similar is being seen across other RPs and is a reflection of the higher publicity of the Housing Ombudsman service and the complaints procedure available within the Council.
CH02: Complaints responded to within Complaint Handling Code timescales	95.35%	100%	100%	100%	99.07%	Target 100%  There were only two complaints which were not responded to within timescale. This score has risen from 97.33% from 23/24.

Responsible Neighbourhood Management						
	Q1	Q2	Q3	Q4	YTD	Comments
TP10: Satisfaction that the landlord keeps communal areas clean and well maintained	N/A	N/A	N/A	N/A	65%	Annual Indicator.  This has risen by 15.7% from 23/24. The overall satisfaction with the communal areas across all RPs in 23/24 was 68%. Benchmarking data for 24/25 will be available later in the year
TP11: Satisfaction that the landlord makes a positive contribution to neighbourhoods	N/A	N/A	N/A	N/A	63%	Annual Indicator.  This has risen by 13.1% from 23/24. The overall satisfaction with making a positive contribution to neighbourhoods across all RPs in 23/24 was 58%. Benchmarking data for 24/25 will be available later in the year
TP12: Satisfaction with the landlord's approach to handling anti-social behaviour	N/A	N/A	N/A	N/A	56%	Annual Indicator.  This has risen by 6.4% from 23/24. The overall satisfaction with the landlords approach to anti-social behaviour across all RPs in 23/24 was 57%. Benchmarking data for 24/25 will be available later in the year.
NM01: Anti-social behaviour cases relative to the size of the landlord	1.35	4.40	2.36	1.69	9.83	There is a considerable range of anti-social behaviour cases reported by landlords as published by the Regulator as reported in the 23/24 results for comparison. From 21 cases per 1000 homes in the lower quartile to 57 cases per 1000 homes in the upper quartile. MDH operates from rural areas, therefore this lower score is expected compared to RPs within built up areas.



## Annex B: Tenancy Enforcement Activities – performance data for 2024/25: Quarters 1, 2 and 3

Neighbourhood & Community Standard – Housing Revenue Account – Estates Team						
	Q1	Q2	Q3	Q4	YTD	Comments
Fraud cases opened	2	0	4	0	6	<p>The performance data categories within this section relate to formal action and so whilst it may not look like many actions have been taken throughout the year, in most cases, a large amount of work will have been done in the background to manage estate issues. This includes partnership working, evidence gathering and meeting with tenants. This work often leads to interventions which resolve issues without the need for formal escalation such as those listed on the left, resulting in positive outcomes for tenants.</p> <p>2 more fraud cases were opened in 24/25 compared to 23/24, this shows the team are working proactively to tackle tenancy fraud.</p> <p>The Neighbourhood Officers now have delegated authority to service warnings relating to Community Protection Notices (CPNs) and also CPNs. This authority was only delegated down during the first quarter of 2024/25. These tools can be used in relation to many tenancy breaches and are seen as a useful addition to the actions available to the Estates team. The data shows that the Neighbourhood Officers have been successfully utilising this authority to combat tenancy breaches.</p>
Fraud cases referred to an external investigator	2	0	4	0	6	
Acceptable Behaviour Agreements signed	0	0	0	0	0	
Good Neighbourhood Agreements signed	0	0	0	0	0	
Community Protection Notice warnings issued	9	0	2	4	15	
Community Protection Notices issued	2	4	0	4	10	
Possession Actions commenced on grounds of ASB	0	2	0	0	2	
Closure Orders – obtained	0	0	0	0	0	
Injunctions sought	0	0	0	0	0	
Evictions on grounds of anti-social behaviour/ other tenancy breach	0	1	0	0	1	

# Annex C: Rent recovery – performance data for 2024/25: Quarters 1, 2, 3 and 4

Income Recovery – Housing Revenue Account – Income Team							
	Q1	Q2	Q3	Q4	Target	YTD	Comments
Current dwelling rent arrears at quarter end %	2.22%	2.29%	2.55%	1.55%	<5%	1.55%%	Rent arrears for the year sits at 1.55% compared to 2.21% in 23/24 with performance well within target. The team continues to engage with tenants and supports those that may be experiencing financial difficulties.
Notice of Seeking possession served	51	17	47	55	N/A	170	These are served to protect the interests of the Council as a landlord. They are not eviction notices, as some people believe, because MDH does not have the authority to undertake an eviction without a possession order. The notice is exactly that, served to reinforce to the tenant that they owe rent and are in breach of their conditions of tenancy. The aim is to encourage tenants to remedy the breach and if they make an arrangement, or clear the debt in full, quite often no further action is necessary. 170 Notice of Seeking possessions were given in 24/25 compared to 293 in 23/24.
Judgement obtained	1	2	2	2	N/A	7	This is where a Court has made a ruling in connection with a request for a possession order made as a result of one or more tenancy breaches. Seeking possession is used as a means to make someone appreciate the seriousness of the situation and if someone engages with the Court or with MDH as a landlord, the outcome of the Court hearing is likely to be more favourable than if they do not. 7 Judgements were obtained in 24/25 compared to 19 in 23/24.
Warrants issued	0	0	0	2	N/A	2	A warrant is issued by the Court if MDH has been able to successfully demonstrate that the possession order made during a Court hearing has been breached and the tenant has made no effort to remedy that breach. There were no warrants obtained during quarters 1, 2 and 3 with only 2 obtained in quarter 4. For comparison, 10 warrants were issued in 23/24. Eviction is seen as a last resort by Officers, who will continue to work with the tenant in an effort to help them to better sustain their tenancy

							even if there is a warrant in place. Tenants have the right to request a Stay of Execution in the run up to an eviction date and our team makes them aware of this. That provides another opportunity for them to engage with the Court and try to reach agreement on re-payment with our Officers.
Evictions on grounds of rent arrears	3	1	0	1	N/A	5	There were fewer evictions this year, compared to 23/24 which saw 7. Officers will endeavour to work with tenants to ensure that they are not evicted but in some cases all attempts will fail and MDH has no option but to move forward in order to protect the interests of the Council.

# Annex D: Building Repairs and Maintenance – performance data for 2024/25: Quarter 1, 2, 3 and 4

Homes and Neighbourhood & Community Standards – Housing Revenue Account – Building Services						
	Q1	Q2	Q3	Q4	YTD	Comments
Decent Homes Standard %	99.28%	99.11%	98.94%	99.52	99.52%	Target 100%  There are 14 home with access that do not meet the decent homes standard.  It should be noted that customer satisfaction, as shown by relevant surveys following planned maintenance work, is 97%. This has risen from 94% from the previous year.
Emergency repairs completed on time %	100%	99.2%	96.5%	95.3%	96.5%	Target 100%.
Urgent repairs completed on time %	97.7%	99.3%	98.5%	98.3%	98.5%	Target 95% - Above target
Routine repairs completed on time %	98.5%	99.3%	98.7%	99.1%	98.7%	Target 95% - Above target
Repairs completed first visit %	98.8%	98.4%	97.4%	97.7%	98.1%	Target 95% - Above target  Whilst many repairs are completed at first visit, it is rare this performance would meet 100% due to the complex nature of some repairs and need for specialist parts.
Gas safety checks %	100%	100%	99.96%	99.96%	99.96%	Target 100%  Gas safety check not completed in respect of one property
Fire risk assessments %	100%	100%	100%	100%	100%	Target 100% - On target

Water safety checks (Legionella) %	100%	100%	100%	100%	100%	Target 100% - On target
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## Voids\*

Voids performance – Housing Revenue Account – Building Services and Allocations Teams						
	Q1	Q2	Q3	Q4	YTD	Comments
Standard voids including temporary accommodation	44.24	44.05	27.06	37.41	38.59	Target 35 working days.
Major voids	61.13	125.35	69.11	96.20	89.03	Target 55 working days
Decent homes voids	141.00	161.20	167.25	213.57	164.00	Target 90 working days
Development voids	N/A	N/A	N/A	N/A	N/A	Target 1 calendar year
Occupancy rate (whole stock)	97.09%	96.82%	96.69%	97.195	97.19%	Target 97%

\* Definitions and targets as per adopted Voids Management Policy 2023