

Agenda

Housing and Homelessness Panel (Panel of the Scrutiny Committee)

This meeting will be held on:

Date: **Thursday 5 October 2023**

Time: **6.00 pm**

Place: **Zoom - Remote meeting**

For further information please contact:

Alice Courtney, Scrutiny Officer

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✉ DemocraticServices@oxford.gov.uk

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- may register in advance to speak to the committee in accordance with the [committee's rules](#)
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Committee Membership

Councillor Lizzy Diggins (Chair)

Councillor Paula Dunne

Councillor Laurence Fouweather

Councillor Jabu Nala-Hartley

Councillor Rosie Rawle

Councillor Jo Sandelson

Apologies received before publication are shown under *Apologies for absence* in the agenda. Those sent after publication will be reported at the meeting.

Agenda

	Pages
1 Apologies	
2 Declarations of Interest	
3 Chair's Announcements	
4 Notes of the previous meeting	7 - 12
<p>The Panel is asked to agree the notes of the meeting held on 02 August 2023 as a true and accurate record.</p>	
5 Housing and Homelessness Panel Work Plan	13 - 18
<p>The Panel is asked to:</p> <ol style="list-style-type: none">1. Consider the Work Plan and agree any amendments.2. Approve the draft scope for the Scrutiny-commissioned item on Housing Associations' Approach to Tenant Engagement and delegate authority to the Scrutiny Officer to schedule the item into the Work Plan in discussion with relevant officers.	
6 Report back on recommendations	19 - 30
<p>At its meeting on 09 August 2023, Cabinet considered the following reports from the Housing and Homelessness Panel and made responses to the recommendations:</p> <ul style="list-style-type: none">• Expansion of the Housing First Programme• Update on Customer Complaints and Feedback <p>Cabinet's responses to recommendations were presented to the Scrutiny Committee at its meeting on 05 September 2023 for noting. The Panel is asked to note Cabinet's responses to its recommendations.</p>	
7 Update on the Housing First Programme in Oxford	31 - 44
<p>The Head of Housing Services has submitted a report to update the Panel on the Housing First programme in Oxford, including service delivery and outcomes. Ossi Mosley, Rough Sleeping and Single Homelessness Manager and Brendan Lewis, Senior Rough Sleeping and Single Homelessness Project Officer have been invited to present</p>	

the report and answer questions. Representatives from St Mungo's and A2Dominion have also been invited to attend. The Panel is asked to consider the report and agree any recommendations.

8 Housing Ombudsman Complaint Handling Code Self-Assessment

45 - 58

The Head of Housing Services has submitted a report to update the Panel on the Council's self-assessment against the Housing Ombudsman's Complaint Handling Code. Bill Graves, Landlord Services Manager has been invited to present the report and answer questions. The Panel is asked to consider the report and agree any recommendations.

9 Dates of future meetings

The Panel is asked to note the dates and times of future meetings of the Housing and Homelessness Panel:

- 05 December 2023, 6pm
- 07 March 2024, 6pm

Meetings will take place remotely via Zoom.

Information for those attending

Recording and reporting on meetings held in public

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- To follow the protocol which can be found on the Council's [website](#)
- Not to disturb or disrupt the meeting
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- To avoid recording members of the public present, even inadvertently, unless they are addressing the meeting.

Please be aware that you may be recorded during your speech and any follow-up. If you are attending please be aware that recording may take place and that you may be inadvertently included in these.

The Chair of the meeting has absolute discretion to suspend or terminate any activities that in his or her opinion are disruptive.

Councillors declaring interests

General duty

You must declare any disclosable pecuniary interests when the meeting reaches the item on the agenda headed "Declarations of Interest" or as soon as it becomes apparent to you.

What is a disclosable pecuniary interest?

Disclosable pecuniary interests relate to your* employment; sponsorship (ie payment for expenses incurred by you in carrying out your duties as a councillor or towards your election expenses); contracts; land in the Council's area; licenses for land in the Council's area; corporate tenancies; and securities. These declarations must be recorded in each councillor's Register of Interests which is publicly available on the Council's website.

Declaring an interest

Where any matter disclosed in your Register of Interests is being considered at a meeting, you must declare that you have an interest. You should also disclose the nature as well as the existence of the interest. If you have a disclosable pecuniary interest, after having declared it at the meeting you must not participate in discussion or voting on the item and must withdraw from the meeting whilst the matter is discussed.

Members' Code of Conduct and public perception

Even if you do not have a disclosable pecuniary interest in a matter, the Members' Code of Conduct says that a member "must serve only the public interest and must never improperly confer an advantage or disadvantage on any person including yourself" and that "you must not place yourself in situations where your honesty and integrity may be questioned". The matter of interests must be viewed within the context of the Code as a whole and regard should continue to be paid to the perception of the public.

Members Code – Other Registrable Interests

Where a matter arises at a meeting which directly relates to the financial interest or wellbeing** of one of your Other Registrable Interests*** then you must declare an

interest. You must not participate in discussion or voting on the item and you must withdraw from the meeting whilst the matter is discussed.

Members Code – Non Registrable Interests

Where a matter arises at a meeting which ***directly relates*** to your financial interest or wellbeing (and does not fall under disclosable pecuniary interests), or the financial interest or wellbeing of a relative or close associate, you must declare the interest.

Where a matter arises at a meeting which affects your own financial interest or wellbeing, a financial interest or wellbeing of a relative or close associate or a financial interest or wellbeing of a body included under Other Registrable Interests, then you must declare the interest.

You must not take part in any discussion or vote on the matter and must not remain in the room, if you answer in the affirmative to this test:

“Where a matter affects the financial interest or well-being:

- a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
- b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest You may speak on the matter only if members of the public are also allowed to speak at the meeting.”

Otherwise, you may stay in the room, take part in the discussion and vote.

*Disclosable pecuniary interests that must be declared are not only those of the member her or himself but also those member’s spouse, civil partner or person they are living with as husband or wife or as if they were civil partners.

** Wellbeing can be described as a condition of contentedness, healthiness and happiness; anything that could be said to affect a person’s quality of life, either positively or negatively, is likely to affect their wellbeing.

*** Other Registrable Interests: a) any unpaid directorships b) any Body of which you are a member or are in a position of general control or management and to which you are nominated or appointed by your authority c) any Body (i) exercising functions of a public nature (ii) directed to charitable purposes or (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union) of which you are a member or in a position of general control or management.

Minutes of a meeting of the Housing and Homelessness Panel (Panel of the Scrutiny Committee) on Wednesday 2 August 2023



Committee members present:

Councillor Diggins (Chair)

Councillor Dunne

Councillor Fouweather

Councillor Rawle

Officers present for all or part of the meeting:

Nerys Parry, Head of Housing Services

Amie Rickatson, Strategy & Service Development Manager

Richard Wood, Housing Strategy and Needs Manager

Ossi Mosley, Rough Sleeping and Single Homelessness Manager

Brendan Lewis, Senior Rough Sleeping and Single Homelessness Project Officer

Bill Graves, Landlord Services Manager

Alice Courtney, Scrutiny Officer

Also present:

Councillor Linda Smith, Cabinet Member for Housing

Apologies:

Councillor(s) Sandelson sent apologies.

10. Declarations of Interest

None.

11. Chair's Announcements

None.

12. Notes of the previous meeting

The Panel agreed the notes of the meeting held on 05 July 2023 as a true and accurate record.

13. Housing and Homelessness Panel Work Plan

The Panel considered the Work Plan.

The Scrutiny Officer provided an update following the Work Plan discussion at the previous Panel meeting:

- The Housing First Acquisition Programme Progress/Outcomes report was scheduled for the October meeting.
- The draft scope for the proposed Operation of Housing Associations Within the City item was under development and would be presented to the Panel for approval in due course.
- The Housing Services Transformation (presentation) item was scheduled for the March meeting.
- The City of Sanctuary Accreditation report was scheduled for the November meeting (*or whichever date that meeting was rescheduled to if a change of date was agreed later in the meeting*).
- Officers had confirmed that the Implementation of the Selective Licensing Scheme report was feasible for Panel consideration in the current year; the Panel date for that item was being confirmed.
- It was proposed that the Housing and Carbon Reduction (in particular, the impact of decarbonisation on tenants) item be added to the list of items for next municipal year so that the Panel could consider a mid-project report on the Social Housing Decarbonisation Fund, subject to next year's Panel taking the item forward.
- It was proposed that the Financial Viability training/briefing take the form of an All Member briefing/training session initially, in order to benefit a wider group of Members; though the item would remain on the list of items for next municipal year in case of any follow-up.
- The Housing Performance Monitoring item had been scheduled in biannually as normal.
- The DSS Discrimination Motion Update standing item had been removed from the list in consultation with the Chair, as all actions were complete aside from the Tenants' Forum element, which was a standing item in its own right.
- The Scrutiny Officer was engaging with officers to understand when a Tenants' Forum Update report could be presented to the Panel.
- The Tenant Involvement and Empowerment Mini-Review Update was due to be considered later in the meeting.

The Panel noted the update from the Scrutiny Officer and agreed the Work Plan as set out in the agenda pack.

14. Report back on recommendations

The Panel noted the following Cabinet responses to its recommendations:

- Future Resettlement Commitments for New Refugee Families
- Tenant Satisfaction (STAR) Survey

15. Expansion of the Housing First Programme

Cllr Linda Smith, Cabinet Member for Housing introduced the report, highlighting that the Council implemented a Housing First programme in 2021/22 to help resolve homelessness of some of the most disadvantaged people in the community. She added that the Housing First programme represented a valuable contribution to long-term homelessness prevention both in the City and worldwide; and, in particular, reported that there had been no evictions or abandonments in respect of individuals supported by Housing First in Oxford.

Ossi Mosley, Rough Sleeping and Single Homelessness Manager added that the Expansion of Housing First in Oxford was a key element of the Council's Housing, Homelessness and Rough Sleeping Strategy; alongside the countywide Oxfordshire Homelessness and Rough Sleeping Strategy, which sought to transform services across the county to end rough sleeping. She advised that there was a high level of need for Housing First provision within Oxford.

In response to questions, the Panel was advised that:

- The Council held a large range of data about individuals who had rough slept in Oxford over the past few years and there were a set of key criteria which helped to target the limited resource to those most in need, which initially had seen a focus on supporting women.
- Equalities had been considered as part of the initial bid for funding, as it formed part of the application process.
- The Council undertook a full Procurement process in respect of the external providers of wraparound support; the Senior Rough Sleeping and Single Homelessness Project Officer held bi-weekly meetings with both providers to monitor the support provision and help broker key relationships.
- The Council was confident that the two external providers were delivering the person-centred support that was needed and were working well together.
- Housing First properties were dispersed as evenly as possible across the City; mapping exercises were undertaken and efforts were made to ensure an even split across the different Tenancy Management patches.
- Officers would expand on the question about the impact of expanding the Housing First programme on other agencies involved in wraparound support and how they can support new individuals within the progress/outcomes report due to be presented to the Panel in October 2023.
- There were competing priorities in terms of availability of housing for different groups (e.g. Care Leavers) and demand for one-bedroom properties was particularly high; however the competing priorities were managed through the Allocations Policy and there was no additional impact as a result of Housing First.
- The Council could not address all of the current need through the programme, but it was a step in the right direction.
- The Oxfordshire Homelessness and Rough Sleeping Strategy was working with Housing Associations across the county to develop a charter in terms of Housing First, which was receiving a lot of support.
- The two external service providers of wraparound support were keen to come and speak to the Panel at its October meeting.

The Panel **agreed** to recommend to Cabinet that:

1. The Council reviews the information contained within the risk register at Appendix 2 to the report to ensure accuracy.

Richard Wood, Housing Strategy and Needs Manager, Ossi Mosley, Rough Sleeping and Single Homelessness Manager and Brendan Lewis, Senior Rough Sleeping and Single Homelessness Project Officer left the meeting and did not return.

16. Update on Customer Complaints and Feedback [presentation]

Nerys Parry, Head of Housing Services introduced the presentation and highlighted that the Social Housing (Regulation) Bill had received Royal Assent on 20 July 2023 to become the Social Housing (Regulation) Act 2023. She advised the Panel that further changes in relation to housing complaints nationally were expected in the near future as a result; and the Council had already received correspondence from the Housing Ombudsman.

Bill Graves, Landlord Services Manager delivered the presentation as set out in the agenda pack, which covered the period from October 2022 to March 2023.

In response to questions, the Panel was advised that:

- The Complaints Officer coordinated information from different service areas to respond to Stage 1 complaints; Stage 2 complaints were responded to by the Head of Service. The next stage was referral to the Ombudsman.
- The Housing Ombudsman had written to local authorities following the Social Housing (Regulation) Act 2023 receiving Royal Assent to set out the new responsibilities, which put complaints on a statutory footing.
- The Council was due to migrate to a different system for handling complaints, which would allow for live dashboard oversight of complaints and the tracking of, drill down into and analysis of complaint trends.
- The recently launched 'Localz' text messaging service allowed for the collection of feedback from tenants, which supported individual performance monitoring.
- The Housing Quality Network was a specialist housing training provider.
- The Council was undertaking some customer journey mapping and appreciative inquiry work.

The Panel **agreed** to recommend to Cabinet that:

1. The Council seeks to gain more information relating to communication more broadly within the customer experience via Localz and other channels, to enable experiences to be tracked and analysed with a view to identifying and implementing improvements.

17. Action Plan Update on the Housing and Homelessness Panel Mini-Review on Tenant Involvement and Empowerment

Nerys Parry, Head of Housing Services introduced the report, which set out an update on progress against the 19 recommendations made by the Panel in 2021/22 following its Tenant Involvement and Empowerment Mini-Review. Bill Graves, Landlord Services Manager provided a summary of progress as set out in the agenda pack.

In response to questions, the Panel was advised that:

- It was not yet known whether the councillor casework system for housing issues (recommendation 17) would link into the Council's Housing Management System or be a standalone system.
- Feedback from tenants in relation to recognition which did not incur universal credit clawback or other benefit issues (recommendation 5) had been positive. In particular, the air fryer prize was very popular and the Christmas 'thank you' card to Tenant Ambassadors had been very well received.

- There were Tenant Ambassadors representing the views of frailer residents (recommendation 7) and the shift to online meetings had facilitated more engagement due to not having to travel to in-person meetings. The Council had provided Tenant Ambassadors with the infrastructure to join meetings virtually if they did not already have it, to ensure inclusivity (e.g. WiFi, device).
- To date, 5 Tenant Ambassadors had undertaken the training on the Housing Revenue Budget and budget consultation process (recommendation 15) to assist them in challenging the Council. Other Tenant Ambassadors had access to a video from the Finance Team.

The Panel agreed that it would be useful for the training on the Housing Revenue Budget and budget consultation process to feed into the wider All Member training programme; and asked for the video from the Finance Team to be made available to All Members. The Panel requested that the Scrutiny Officer follow-up after the meeting.

The Panel **noted** the report and progress against the recommendations.

18. Dates of future meetings

The Panel noted the dates and times of future meetings and agreed to reschedule the 02 November 2023 meeting to 05 December 2023, 6pm via Zoom.

The meeting started at 6.05 pm and ended at 7.29 pm

Chair

Date: Thursday 5 October 2023

When decisions take effect:

Cabinet: after the call-in and review period has expired

Planning Committees: after the call-in and review period has expired and the formal decision notice is issued

All other committees: immediately.

Details are in the Council's Constitution.

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Housing and Homelessness Panel Work Plan

NB This work plan is provisional and is subject to change. Changes made outside meetings are agreed between the Scrutiny Officer and the Chair.

Cabinet items beyond two months in advance are not included on the work plan owing to the greater potential they will move or alternative items of higher priority arise in the meantime.

05 October 2023 – confirmed reports

Agenda item	Cabinet item	Description	Cabinet portfolio	Lead officer
Housing First Acquisition Programme Progress/Outcomes	No	To consider the report and agree any recommendations.	Cabinet Member for Housing	Nerys Parry, Head of Housing Services
Housing Ombudsman Complaint Handling Code Self-Assessment	No	To consider the report and agree any recommendations.	Cabinet Member for Housing	Nerys Parry, Head of Housing Services

05 December 2023 – provisional reports

Agenda item	Cabinet item	Description	Cabinet portfolio	Lead officer
Housing Performance Monitoring 2023/24 (mid-year)	No	To consider the 2023/24 mid-year Housing Performance Report and agree any recommendations.	Cabinet Member for Housing	Nerys Parry, Head of Housing Services
City of Sanctuary Accreditation	No	To consider the report and agree any recommendations.	Cabinet Member for Housing	Nerys Parry, Head of Housing Services

Private Rented Sector Regulation Policies – results of consultation and approval	Yes	The report requests Cabinet approval of revised enforcement policies following consultation. To consider the report and agree any recommendations.	Cabinet Member for Housing	Ian Wright, Head of Regulatory Services and Community Safety
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07 March 2024 – provisional reports

Agenda item	Cabinet item	Description	Cabinet portfolio	Lead officer
Landlord Services Transformation (Social Housing (Regulation) Act Compliance) [presentation]	No	To receive a presentation followed by opportunity for discussion; and to agree any recommendations.	Cabinet Member for Housing	Nerys Parry, Head of Housing Services
Implementation of Selective Licensing	No	To consider the report and agree any recommendations.	Cabinet Member for Housing	Ian Wright, Head of Regulatory Services and Community Safety

Oxford City Council Housing and Homelessness Panel Scoping Template

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Topic	Housing Associations' Approach to Tenant Engagement
Chair / lead member	Cllr Lizzy Diggins (Chair, Housing and Homelessness Panel)
Other Standing Panel Members	Cllr Paula Dunne, Cllr Laurence Fouweather, Cllr Jabu Nala-Hartley, Cllr Rosie Rawle, Cllr Jo Sandelson
Officer support and allocate hours	Scrutiny Officer support – approx. 1 day per week for Housing and Homelessness Panel work, to be split between other areas of work the Panel wishes to consider. Additional support from other Council officers as required.
Background and rational	<p>The Housing and Homelessness Panel selected a number of Scrutiny-commissioned items to consider during the 2023/24 municipal year – one of which related to Housing Associations' approach to tenant engagement.</p> <p>Having previously undertaken a mini-review of Tenant Involvement and Empowerment in 2021/22 which focused on the work that Oxford City Council delivers as a social landlord and tenant voice in Council properties; and the Scrutiny activity planned during 2023/24 on supporting private sector tenants (i.e. via a review of Selective Licensing implementation) the Panel is of the view that it would be helpful to undertake a further review in relation to the work of Housing Associations operating within Oxford to understand how housing across different sectors and providers works across the City; and how different approaches are aligned to deliver the wider housing sector and tenant support. It is intended that this review would focus on social housing provided by Housing Associations; interlinking with other work being undertaken by the Panel during the 2023/24 municipal year.</p> <p>Anecdotal evidence suggests that, in conducting ward casework on behalf of tenants, there is a disconnect between the work of the Council and Housing Associations; it is not clear where there are interlinkages and there is uncertainty around the route which should be taken to ensure swift resolution of issues for tenants. Through developing a better understanding of the work and processes of Housing Associations, councillors would be better placed to support tenants across the City and work with Housing Associations.</p> <p>A review of different approaches across the City will assist with sharing learning and experiences; along with helping tenant voice and tenant experience to be considered (and therefore aligned/consolidated) across the City, rather than the existence of singular organisational approaches across Oxford.</p>

Purpose / Objective	<p>To review the approaches of Housing Associations operating within the City to better understand their processes, how they align/work with Oxford City Council and how they engage with and empower tenants. Key lines of inquiry to include:</p> <p>Tenant Voice, Engagement and Involvement</p> <ul style="list-style-type: none"> • Resident engagement framework • Governance structures and how they allow tenant voice and influence to flow through the organisation <p>Communication</p> <ul style="list-style-type: none"> • Approach to managing complex issues and complaints and how councillors can be most effective in providing help and support to tenants; including interlinkages between Housing Associations and the Council • Communications and engagement with tenants (and councillors when undertaking ward casework)
Indicators of Success	<ul style="list-style-type: none"> • Wide and constructive engagement with officers, stakeholders, experts and tenants • The production of a final report and recommendations • The majority of recommendations are agreed and implemented • Positive feedback from Members, officers and witnesses • Improved knowledge of Council and Housing Association processes and how they align; leading to improved working relationships – and improved tenant experience
Out of scope	<ul style="list-style-type: none"> • Housing Supply/build pipeline; stock condition (<i>with the exception of tenant voice/experience, which is in scope</i>). • Tenancy Strategy – this will be picked up as a separate piece of work, which Scrutiny will have the opportunity to consider. • How Housing Associations might support the broader work of the Council such as their role in preventing homelessness and actions within the Housing, Homelessness and Rough Sleeping Strategy 2023-28 – this element will be picked up through the annual reporting of the Housing, Homelessness and Rough Sleeping Strategy 2023-28, which Scrutiny will have the opportunity to consider. • Standards/regulation, including Housing Associations' compliance with the Social Housing Regulation Bill and regulatory standards, performance data and alignment with the Homes for Cathy commitments. The Housing Ombudsman is looking at Housing Associations and it is likely that they will be more closely monitored by the regulator in future; it is recommended that the outcome of this work, and implementation of work to comply with the Social Housing Regulation Bill is understood before the Panel undertakes any detailed work
Methodology/	Evidence gathering could include:

Approach	<ul style="list-style-type: none"> • Inviting written and/or verbal evidence from Council officers, key stakeholders, expert witnesses and tenants; • Call for evidence from councillors and Advice Centres on their experiences and types of issues that they are presented with • Consideration of information provided by Housing Associations • Desk research / literature review.
Witnesses/ Experts	<p>Cllr Linda Smith, Cabinet Member for Housing Nerys Parry, Head of Housing Services Richard Wood, Housing Strategy and Needs Manager Amie Rickatson, Strategy and Service Development Manager Housing Associations operating within the City Ward Members Advice Centres</p>
Panel Meetings	1-2 meetings (dates tbc)

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To: Cabinet
Date: 09 August 2023
Report of: Housing and Homelessness Panel
Title of Report: Expansion of the Housing First Programme

Summary and recommendations	
Purpose of report:	To present Panel of the Scrutiny Committee recommendations for Cabinet consideration and decision
Key decision:	No
Scrutiny Lead Member:	Cllr Lizzy Diggins, Panel Chair
Cabinet Member:	Cllr Linda Smith, Cabinet Member for Housing
Corporate Priority:	Deliver More Affordable Housing; Support Thriving Communities
Policy Framework:	Housing, Homelessness and Rough Sleeping Strategy 2023-28
Recommendation: That the Cabinet states whether it agrees or disagrees with the recommendations in the body of this report.	

Appendices	
Appendix A	Draft Cabinet response to recommendations of the Scrutiny Committee

Introduction and overview

1. The Housing and Homelessness Panel met on 02 August 2023 to consider a report concerning Expansion of the Housing First Programme. The report, which is due for Cabinet consideration on 09 August 2023, recommends that Cabinet approves the Council's participation in the Single Homelessness Accommodation Programme (SHAP) in order to purchase 12 new units for Housing First alongside commissioning support for a total of 17 units, including 5 units drawn from general needs stock. The report also seeks a Cabinet resolution to recommend to Council:
 - The allocation of a £2,888,000 capital budget (of which £1,688,000 will be borrowed by the Housing Revenue Account) for the Council's investment to

purchase the properties as part of the SHAP outlined in paragraph 19 of the report, the balance of which will be met by the SHAP grant; and

- A budget allocation of £600,000 to cover revenue costs to commission support providers to deliver support for the 17 units of Housing First. The funding equates to 3 years' worth of revenue but is spread over 4 financial years (paragraph 18 of the report).
2. In addition, the report recommends that Cabinet delegates authority to the Executive Director (Communities and People) in consultation with the Cabinet Member for Housing; the Head of Financial Services/Section 151 Officer; and the Head of Law and Governance/Monitoring Officer, to enter into agreements and contracts to facilitate the purchase by the Council of housing (to be held in the HRA) within the identified budget and within the project approval, as well as to enter into or amend agreements or contracts in relation to support provision (revenue spend) in line with procurement requirements.
 3. The Panel would like to thank Councillor Linda Smith (Cabinet Member for Housing), Nerys Parry (Head of Housing Services), Richard Wood (Housing Strategy and Needs Manager), Ossi Mosley (Rough Sleeping and Single Homelessness Manager) and Brendan Lewis (Senior Rough Sleeping and Single Homelessness Project Officer) for attending the meeting to answer questions.

Summary and recommendations

4. Councillor Linda Smith, Cabinet Member for Housing introduced the report. The Council implemented a Housing First programme in 2021/22 to help resolve homelessness of some of the most disadvantaged people in the community. The programme funded the purchase of up to 40 units; however this number had not been reached due to difficulty in identifying suitable accommodation. The 5 outstanding units were able to be carried forward into the current SHAP, extending the SHAP provision from 12 to 17 units. The Housing First programme represented a valuable contribution to long-term homelessness prevention and the worldwide evidence base showed that Housing First was successful in helping individuals to sustain tenancies. The evidence in Oxford was that Housing First was working; in particular there had been no evictions or abandonments in respect of individuals supported by Housing First in the City.
5. The Expansion of Housing First in Oxford was a key element of the Council's Housing, Homelessness and Rough Sleeping Strategy; alongside the countywide Oxfordshire Homelessness and Rough Sleeping Strategy, which aimed to transform services across the county to end rough sleeping. There was a high level of need for Housing First provision within Oxford.
6. The Panel asked a range of questions, including questions relating to the equalities impact and how individuals were prioritised to receive Housing First support; how the Council quality assures the services delivered by the external providers of wraparound support; the distribution of Housing First properties across the City; the impact of the Housing First programme on the availability of housing for other groups (e.g. Care Leavers); the impact of expanding the programme on other wraparound support agencies across the City; how far

Housing First will go to address existing need in the City; and the information contained within the risk register.

7. In particular, the Panel sought clarification on the contents of the risk register at Appendix 2 to the report. It was noted that the risks relating to Tenancy Sustainment and Housing First Acquisition were listed as opportunities, however the risk descriptions, causes and consequences seemed to suggest that these risks should be listed as threats rather than opportunities. The Panel agreed that a review of the risk register to ensure all information contained within it was accurate would be prudent.

Recommendation 1: That the Council reviews the information contained within the risk register at Appendix 2 to the report to ensure accuracy.

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Appendix A
Draft Cabinet response to recommendations of
the Housing and Homelessness Panel of the Scrutiny Committee

The document sets out the draft response of the Cabinet Member to recommendations made by the Housing and Homelessness Panel on 02 August 2023 concerning Expansion of the Housing First Programme. The Cabinet is asked to amend and agree a formal response as appropriate.

23

Recommendation	Agree?	Comment
1) That the Council reviews the information contained within the risk register at Appendix 2 to the report to ensure accuracy.	Yes	The Risk Register accompanying the Cabinet report has been amended to reflect that the risk descriptions relating to Tenancy Sustainment and Acquisitions are listed as threats rather than as opportunities, as pointed out by the Panel Chair at the meeting. Further corrections have been made to the Risk Register to ensure that it is accurate, including updating of the name of the owner for all risks following officer changes (see Annex 1).

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Appendix 2: Risk Register

Title	Risk description	Opp/ threat	Cause	Consequence	Date Raised	Owner	Gross		Current		Residual		Comments	Controls				
							I	P	I	P	I	P		Control description	Due date	Status	Progress %	Action Owner
Tenancy Sustainment	Tenants are evicted due to arrears, antisocial behaviour or other reasons	threat	Appropriate support not provided	Potential increase in rough sleeping	14/6/23	Ossi Mosley	3	3	3	2	3	1		Ensure Housing First services are delivered with a high fidelity to Housing First principles	31/3/24	In Progress	25	Brendan Lewis
Housing First acquisition	Properties are not suitable for HF tenants due to location, property type or other reasons	threat	Limited availability of suitable one bed properties	High failure rate of HF tenancies	14/6/23	Ossi Mosley	3	3	3	3	2	2		Review previous acquisition programmes with affordable development team. Work with Tenancy Management, Anti social behaviour and providers to manage any risk associated with certain locations.	31/3/25	In Progress	25	Brendan Lewis
Increase in demand for Housing First 25	Continual flow to the street leads to increasing demand for Housing First accommodation	threat	Cost of living and increasing housing affordability gap leads to an increase in homelessness and rough sleeping	Service unable to meet demand	14/6/23	Ossi Mosley	3	3	3	2	3	1		Ensure prevention work is increased across Housing Needs. Adopt a system wide approach to managing homelessness.	31/3/25	In Progress	10	Ossi Mosley

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To: Cabinet
Date: 09 August 2023
Report of: Housing and Homelessness Panel
Title of Report: Update on Customer Complaints and Feedback

Summary and recommendations	
Purpose of report:	To present Panel of the Scrutiny Committee recommendations for Cabinet consideration and decision
Key decision:	No
Scrutiny Lead Member:	Cllr Lizzy Diggins, Panel Chair
Cabinet Member:	Cllr Linda Smith, Cabinet Member for Housing
Corporate Priority:	Deliver More Affordable Housing; Support Thriving Communities
Policy Framework:	Housing, Homelessness and Rough Sleeping Strategy 2023-28
Recommendation: That the Cabinet states whether it agrees or disagrees with the recommendations in the body of this report.	

Appendices	
Appendix A	Draft Cabinet response to recommendations of the Scrutiny Committee

Introduction and overview

1. The Housing and Homelessness Panel met on 02 August 2023 to consider an update on customer complaints and feedback. It was recommended that the Panel receive a presentation followed by an opportunity for discussion; and agree any recommendations.
2. The Panel would like to thank Councillor Linda Smith (Cabinet Member for Housing), Nerys Parry (Head of Housing Services) and Bill Graves (Landlord Services Manager) for attending the meeting to present and answer questions.

Summary and recommendations

3. Nerys Parry, Head of Housing Services introduced the presentation and highlighted that the Social Housing (Regulation) Bill had received Royal Assent on 20 July 2023 to become the Social Housing (Regulation) Act 2023. As a result, further changes in relation to housing complaints nationally were expected in the near future; and the Council had already received correspondence from the Housing Ombudsman. Bill Graves, Landlord Services Manager delivered the presentation, which covered the period from October 2022 to March 2023.
4. The Panel asked a range of questions, including questions relating to the differences between Stage 1 and Stage 2 complaints; oversight of the complaints process; and tracking emergent complaints trends.
5. The Panel noted responses to questions that the current ICT products had functionality to allow Oxford Direct Services to track, drill down into and analyse emergent trends within complaints. This functionality was due to be expanded to the Council in the near future. Officers advised that feedback was also sought through the recently launched 'Localz' text messaging service, which was proving to be transformational in terms of improved quality of service and emphasis on customer experience.
6. While the Panel agreed that progress was moving in the right direction, it agreed that it would be of benefit to the Council to focus on gaining more information related to customer experience in terms of communication more broadly, both through 'Localz' and other channels to ensure inclusivity. The Panel agreed that communication, and what tenants wanted or expected in terms of communication, was a key aspect of the service which should be prioritised for improvement.

Recommendation 1: That the Council seeks to gain more information relating to communication more broadly within the customer experience via Localz and other channels, to enable experiences to be tracked and analysed with a view to identifying and implementing improvements.

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Appendix A
Draft Cabinet response to recommendations of
the Housing and Homelessness Panel of the Scrutiny Committee

The document sets out the draft response of the Cabinet Member to recommendations made by the Housing and Homelessness Panel on 02 August 2023 concerning the Update on Customer Complaints and Feedback. The Cabinet is asked to amend and agree a formal response as appropriate.

29

<i>Recommendation</i>	<i>Agree?</i>	<i>Comment</i>
1) That the Council seeks to gain more information relating to communication more broadly within the customer experience via Localz and other channels, to enable experiences to be tracked and analysed with a view to identifying and implementing improvements.	Yes	Localz has already improved communication with tenants who have booked repairs. Learning from complaints is being shared and will be publicised.

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To: Housing and Homelessness Panel
Date: 05 October 2023
Report of: Head of Housing Services
Title of Report: Update on the Housing First Programme in Oxford

Summary and recommendations	
Purpose of report:	To update the panel on the Housing First programme in Oxford, including service delivery and outcomes.
Key decision:	No
Cabinet Member with responsibility:	Councillor Linda Smith, Cabinet Member for Housing
Corporate Priority:	Deliver more affordable housing; Support Thriving Communities
Policy Framework:	Housing, Homelessness and Rough Sleeping Strategy 2023-28
Recommendation(s): That the Panel resolves to:	
1. Note the contents of the report and agree any recommendations.	

Appendices	
Appendix 1	Housing First Principles
Appendix 2	Risk Register (NSAP allocation, November 2020)
Appendix 3	Risk Register (Expansion of the Housing First Programme, August 2023)

Introduction and background

1. The Council implemented a Housing First programme in the City in 2021/22. This followed successful capital and revenue bids from two of the Department for Levelling Up, Housing and Communities (DLUHC) rough sleeping programmes – Next Steps Accommodation Programme (NSAP) and the Rough Sleeping Accommodation Programme (RSAP). The funds have allowed the acquisition of one-bedroom properties in the City as well as fund support services. Between these two funding streams, 35 people will be supported through Housing First by the end of March 2024.

2. In summer 2023, the Council was awarded further capital and revenue funding from Homes England under the Single Homeless Accommodation Programme (SHAP) to expand the Housing First programme. The funds will contribute to the acquisitions of one-bedroom properties in the City to be for Housing First, as well as fund support services. Through this funding stream, 17 people will be supported through Housing First over the next two years.
3. Housing First is an internationally evidenced housing intervention which has proved successful in supporting persons with a long history of homelessness and who may have multiple and complex needs to maintain housing. There is great need for this housing intervention in Oxford and the delivery of more Housing First is a key element of the Council's Housing, Homelessness and Rough Sleeping Strategy 2023-28 as well as the Oxfordshire Homelessness and Rough Sleeping Strategy 2021-26.
4. This report will provide further detail on the Housing First approach, how the provision currently being delivered in Oxford by St Mungo's and A2Dominion (funded through RSAP and NSAP) functions, and key outcomes.

What is Housing First and how does it operate in Oxford

5. The main premise of Housing First is to provide a stable and independent home without the need for a person to first prove that they are tenancy ready, or that they can sustain a tenancy. Instead, they are given a permanent offer of a home, with support provided to enable them to maintain the tenancy.
6. Homeless Link has produced guidance and best practice in relation to Housing First. This sets out 7 principles of Housing First and adhering to these has the best outcomes. The 7 principles are:
 - a. People have a right to a home
 - b. Flexible support is provided for as long as it is needed
 - c. Housing and support are separated
 - d. Individuals have choice and control
 - e. An active engagement approach is used
 - f. The service is based on people's strengths, goals and aspirations
 - g. A harm reduction approach is used
7. More information about the Housing First principles is also available in Appendix 1.
8. The Council's aim is for Housing First in Oxford to be delivered with high fidelity (i.e. closely aligned to the 7 principles). This is because the evidence from a range of projects nationally shows that high fidelity models have the best chances of success. Under the Housing First model, providers have been able to assist the most vulnerable people and/or those with the most chaotic housing history in the City into stable accommodation.
9. Housing First is aimed at long-term entrenched rough sleepers who have exhausted all traditional routes off the streets. The model is aimed at those who have not been able to manage in supported accommodation and who cannot manage a tenancy independently. Persons who are put forward for Housing First have normally experienced homelessness for a long period of time and struggle to maintain

accommodation, often linked to that person experiencing multiple and complex needs.

10. As such, Housing First is unlikely to be the right accommodation for all individuals who have a history of homelessness. Where an individual can manage either independent living in the social or private rented sectors, or living in the social or private rented sectors with some floating support in place, they are unlikely to be in need of Housing First accommodation and the support that comes with this. Likewise, there are a number of people in supported accommodation (either in a congregate setting or in a dispersed setting) where they are managing well.
11. Unlike traditional homelessness services, the only condition placed on the individual is a willingness to maintain a tenancy. Support is bespoke to the needs of the individual, and they are able to engage with this on their own terms.
12. To allow support workers to provide intensive and flexible support, Housing First support workers work with a lot fewer people than colleagues working in standard supported housing. In Oxford, a Housing First support worker works with a maximum of 6-7 persons at any one time. Relationship building between support workers and individuals is key; engagement starts before a person moves into the accommodation and continues when the person moves into the accommodation.
13. It should be noted that Housing First support workers are not experts in every field where a person may need support. An important part of the support provided and relationship with the person is to facilitate other support agencies to provide this. Many of the individuals currently in Housing First accommodation or those who are in need of Housing First accommodation are already working with other support organisations to some extent, for example substance misuse services such as Turning Point. However, due to having led chaotic lives, often due to trauma and not having a stable home, the support that can be provided by such services can be limited and ineffective. For example, people may use emergency health care, rather than primary care services. Through living in stable accommodation in Housing First and having a dedicated Housing First support worker that can help facilitate the relationship between more specialist services and the individual, the individual's wellbeing will improve and services provided by others will be more effective. By allowing people to live in a safe, secure physical environment, this creates the psychological space for people to recover from homelessness.
14. As stated above, the current Housing First programme in Oxford is delivered by St Mungo's and A2Dominion. A deliberate decision was made to commission two different providers to deliver the service, under two separate contracts, in order to provide choice to residents about which organisation they are supported by.
15. Close partnership work between the two providers of Housing First in Oxford is key and has thus far been highly successful. As commissioners of Housing First under RSAP and NSAP, the Council does not run the contracts as separate entities but instead as a single service, with 2 separate support teams that facilitate choice for the clients. The two organisations do not compete with each other, but work together well to assist and support each other to improve and develop the services. For example, St Mungo's and A2Dominion staff attend joint visits to homes and other settings, to ensure that the individuals feel supported.
16. To date, the Housing First programme has been highly successful in Oxford. As of 01 September 2023, a total of 24 persons are housed in Housing First with one

individual expected to move into accommodation by the end of September 2023. A further 5 individuals are currently being supported by St Mungo's and A2Dominion whilst properties are sought for them. Furthermore, we have recently opened referrals to expand the cohort further.

17. At the time of writing this report there have been no evictions or abandonments from any of the properties and some of the individuals housed have remained in the same accommodation for longer periods than ever before. However, there are significant challenges associated with housing individuals who are suitable for Housing First and we are unfortunately likely to see some individuals being evicted or abandoning their housing. There have been a number of challenges since the inception of the programme, including instances of anti-social behaviour, building up of rent arrears and individuals not coping well in general in their accommodation. Where possible, the concerns are being addressed by multi-agency working, but we are aware that not every tenancy can be saved. As noted in paragraph 22 below, we have a Key Performance Indicator (KPI) of 80% tenancies sustained year-on-year, as the recognised standard for Housing First projects. This is to reflect how difficult the process can be for individuals to move away from homelessness after years of experiencing multiple disadvantage.

Monitoring and performance of the service

18. Both A2Dominion and St Mungo's have monitoring in place for their contracts. Monitoring is provided every quarter and monitoring meetings between the City Council as commissioners and the providers are held. Through this thorough and collaborative monitoring process, the proactive strengths-based work that is taking place with all clients and the positive impact that this has on the clients' lives is highlighted.
19. The monitoring also specifically addresses the fidelity of the model of Housing First and how closely services are adhering to it. Monitoring meetings also provide an open forum to discuss any barriers faced and how the service can be improved.
20. In addition to the quarterly monitoring meetings, we also hold fortnightly meetings with the two service providers to make sure that we are staying on top of all facets of the work. The meeting covers all things related to the allocation process and ensures that both the Council and the service partners are clear on how to proceed with each case. The meetings also cover individuals that are currently accommodated within the service and provides an opportunity to highlight any issues or concerns in respect of any of the tenancies. Off the back of this we will invite teams from within the Council to attend subsequent meetings to resolve the issues highlighted. To date the Income, ASBIT and Tenancy Management teams have attended to address specific common concerns.
21. The main aspect of the service that is monitored is if tenancies in Housing First are sustained. As stated above, the tenancy sustainment rate for the service thus far is 100%. Part of the approach to commissioning this service is not to be too prescriptive and allowing the service providers the freedom to support individuals in the flexible and intensive way that is needed. The only KPI that is attached to the service is therefore that 80% of tenancies should be sustained year-on-year.

22. In addition to the KPI, we are also asking St Mungo's and A2Dominion to provide other information so that we can work with them to ensure that the service is delivered on-track. The measures are:

	21/22	Q1 22/23	Q2	Q3	Q4	Q1 23/24	Q2
Number of people considered for Housing First	18	n/a	n/a	16	n/a	n/a	n/a
Number of clients being case worked	18	16	16	32	30	30	30
Number of new tenancies started that quarter	n/a	2	7	7	5	2	2
Number in accommodation	n/a	2	9	16	21	23	25
Number of evictions and abandonments	n/a	0	0	0	0	0	0
Tenancy Sustainment Rate	n/a	100%	100%	100%	100%	100%	100%

Update on acquisitions

23. Key to the delivery of the Housing First programme is of course that the Council has properties available for people. As the high fidelity Housing First model calls for accommodation to be permanent, the accommodation really does need to be provided by social landlords, like housing associations or local authorities, where a person would be given a social tenancy.

24. The accommodation should also be self-contained and at a social rent so that the accommodation is affordable.

25. The location of Housing First properties must also be carefully considered. In Oxford, we aim to spread the units out across the city where we can, but we are limited to purchase properties in areas where this is affordable, or where the Council already owns properties. Location of properties used for Housing First is important - people accommodated in Housing First should be able to integrate and be part of the community where they live and they should be treated as individuals. Spreading properties across the city also means that there is less likelihood of potential anti-social behaviour in one or a few areas of the city, due to congregation of other people in the area, or clients' sometimes chaotic behaviour. It also means that the function of the Council's Tenancy Management is incorporated into every locality. This spreads knowledge of the service and what it is trying to achieve.

26. In addition to sourcing properties in the right location of the city, there are further considerations for the Council's Affordable Supply Team, which carries out acquisitions. The additional acquisitions into the Housing Revenue Account (HRA) stock will likely lead to refurbishment work needing to be completed at some of the new units in order to bring them up to Decent Homes standards, as well as an EPC C rating. The Council avoids purchasing properties where the costs of bringing the unit to these standards is prohibitive. It will also require additional conveyancing work to be undertaken by Legal Services.

27. Under the NSAP and RSAP programmes, the Council received funding to enable support to be provided for up to 40 people. We received capital funding to purchase 15 units of accommodation and these properties are now part of the Council's housing stock.

28. The remaining units of accommodation are being released by Oxford City Council and A2Dominion housing stock. All clients under the Housing First programme receive support as described above.
29. There have been challenges to secure sufficient one-bedroom accommodation units for Housing First in Oxford, and in particular from Oxford City Council housing stock. This has meant that units have come online slower than expected and also that we will not be able to provide the 40 units that was originally hoped. There is great demand for social rented one-bedroom accommodation in the city, and this demand has to be carefully balanced in order not to disadvantage other groups in high housing needs, such as care leavers.
30. As of 01 September 2023, a total of 25 units are available for Housing First in the City under the NSAP and RSAP programmes, and we expect a further 10 units to become available by the end of March 2024.

	NSAP/RSAP funded	Units available Sep 23	Estimated units available Mar 24
Oxford City to purchase	15	15	15
Oxford City to release from existing stock	20	6	15
A2 Dominion	5	4	5
Total	40	25	35

31. With additional funds sourced through the SHAP programme, a further 17 Housing First units will also be available over the next two years. 12 of these will be purchased by the City Council using capital funding and HRA funds. Therefore, there will be over 50 units of Housing First accommodation available in the city in the next two years.
32. There is high demand for Housing First accommodation and associated support in the city and we are likely to need more than the 50 units that current funding is enabling. We will therefore continue to bid for funding to enable this provision to expand further. The wider transformation of services for single homeless individuals and those who are experiencing rough sleeping that is currently delivered by the Oxfordshire Homelessness Alliance, is striving to move some of the provision of more traditional forms of supported accommodation and congregate settings, to the provision of more Housing First and housing-led provision. In the longer term, this will meet the aims of the Oxfordshire Homelessness and Rough Sleeping Strategy, it will contribute to a reduction in single homelessness and rough sleeping, and result in better outcomes for individuals.

Financial implications

33. The Housing First programme being delivered in Oxford at present is funded through two different government grants, as described above – NSAP and RSAP, with further units being acquired under the SAHP programme in due course. There

are financial implications for the Council to purchase properties to be used for Housing First, and these have been explored in the three different reports that have gone to Cabinet to seek approval to submit bids to these funds and/or to use these funds to acquire properties. In the most recent report to Cabinet in relation to SHAP funding, where the Council is required to also use HRA funds to fund the purchase of properties, it described that calculations have been made showing that the impact on the HRA Interest Recover Ratio is negligible and that it is able to cover the expected interest costs of borrowing using the rental income generated.

34. The support delivered by Housing First support workers in Oxford is as described above and funded through Government funding and does therefore not involve a direct cost to the Council. As people housed through the programme are well supported, improve their health and well-being, and maintain their accommodation, there are overall savings to the public purse, spread over local housing authorities, social and health care, public health, and mental health.
35. Although the overall savings to the public purse are significant, the up-front cost of commissioning Housing First is expensive. The provision of the support for Housing First is more costly than standard supported accommodation due to the staff-to-client ratio. As described above, Housing First support workers work with 6-7 clients, whilst support workers in other supported accommodation would work with more than that. Due to the cost of support, we have thus far relied on Government funding such as RSAP, NSAP and SHAP to enable the provision of Housing First in the City. We will continue to rely on such funding in order to continue to deliver the programme when the current funding comes to an end.

Legal issues

36. The procurement, commissioning and award of contracts for the Housing First programme, funded through the various Government funding streams, have been, and will be, undertaken in compliance with the Council's contract rules contained in Part 19 of its Constitution.

Level of risk

37. The Risk Registers for Housing First that have accompanied Cabinet reports requiring decisions in relation to Housing First are attached as Appendix 2 and Appendix 3.

Equalities impact

38. Housing First is an intervention targeted at some of the most vulnerable members of society. Housing first is contained in the Council's Housing, Homelessness and Rough Sleeping Strategy which had a full Equalities Impact Assessment carried out on it before its adoption by Council. The service will be subject to monitoring of its performance and impact on individuals, including matters of equality and diversity.

Conclusion

39. The enabling of the Housing First programme by Government funding is providing important housing and associated support to some of the most vulnerable persons in Oxford.
40. Delivery of support is person-centred, done in partnership with other services and resulting in good outcome for individuals.

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Background Papers: None

Appendix One – Housing First principles

Homeless Link are acknowledged as experts in the Housing First approach. They have developed a set of principles for the delivery of Housing First, with advice and support from the University of York, with feedback from Housing First providers and experts both in the UK and internationally. These are summarised as follows:

People have a right to a home

Bolstering the supply of affordable housing options and keeping any evictions to an absolute minimum. Removing the conditionality from the system, e.g. so people do not have to first prove they are tenancy ready, thereby earning the right to a home. The system views housing as a human right.

Flexible support is provided for as long as it is needed

Our need for support naturally fluctuates; it is almost impossible to predict exactly how much support an individual will need, around which issues and for how long. Yet support for those experiencing homelessness tends to be commissioned in time-limited blocks; some people experience 'cliff-edges' where support suddenly ends, some may be over-supported at times. Instead, a housing-led system allows for support to flex around a person in their own home when they need it.

Housing and support are separated

This separation means that the housing offer is not dependent on the support offer; so if the support comes to an end, the person does not have to move. Conversely, a person does not have to move into a buildings-based project in order to access support; and the support relationship can stay with a person where they want or need to move. Separating the support from the landlord function can also help to clarify the role of different workers, thereby building better relationships (in our research with people using the system, some felt staff are more interested in the building than the people).

Individuals have choice and control

Choice is often designed out of the service response to single homeless people: people are 'placed', 'sent', 'signposted' and, if very lucky, 'housed'. Research suggests that increasing a person's sense of choice and control improves their outcomes and that services are less effective when they are "done to people". Instead, a housing-led system treats people experiencing homelessness as adults and citizens.

The service is based on people's strengths, goals and aspirations

Seeing the person as a survivor, as an individual, as a person, rather than a problem to be managed, and recognising that everyone has strengths. In a housing-led approach, we move from assessments which focus on risks, needs and eligibility to more creative assessments which recognise the strengths, resources and relationships the person brings to the situation and works with them to consider how they can build on these.

An active engagement approach is used

Recognising that services are often 'hard-to-reach', and that closing the case of a person who is experiencing homelessness, substance use or mental health challenges because they behave in a way we find challenging is often counter-productive. Instead, professionals are responsible for proactively engaging their clients; making the service fit the individual instead of trying to make the individual fit the service.

A harm reduction approach is used

Recognising that abstinence from substance use and other potentially harmful behaviours is not desirable and/or realistic for many at this point in time, and that these individuals may disengage if pressured into abstinence by professionals. Instead, workers support

individuals to set their own goals and develop their own strategies to manage risk. A housing-led approach recognises the harm that comes from all forms of homelessness (especially rough sleeping) and seeks to reduce this by avoiding homelessness or by supporting a person to exit homelessness as quickly as possible.

Appendix 1 - Risk Register - Project Approval and NSAP Project Funding - Cabinet Report 11th November 2020

Ref	Title	Risk description	Opp/ threat	Cause	Consequence	Date Raised	Owner	Gross		Current		Residual		Comments	Controls					
								I	P	I	P	I	P		Control description	Due date	Status	Progress %	Action Owner	
1	Insufficient opportunities to spend these funds as intended	Insufficient housing market or development activity to enable suitable investments to be made that achieve value for money	Threat	The 20/21 grant funding is requiring spend within a very limited window of 3 months (Qtr 4) - a quarter where market sale activity is often lower - with an additional challenges of requiring vacant possession and completion within weeks of the initial viewing. For 21/22, the level of activity (10 units) has been set at what is considered a reasonable pace to allow further in-year acquisitions as units come onto the sale market.	Council does not pursue these initiatives further and may need to only purchase a smaller number of units and seek to negotiate an extension of time if more are to be acquired beyond end March 2021	01/10/20	Stephen Clarke	3	4	3	3	2	2		Work is already underway to mobilise for this work in Quarter 4, including the early identification of possible units ahead of time and as part of the on-going HRA acquisition project that is already underway. To ensure adequate resourcing across all relevant teams to progress viewings, negotiations, surveys and conveyancing at pace, with due diligence, and within the existing and agreed framework.	Ongoing	Ongoing	75	Dave Scholes	

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Appendix 2: Risk Register (accompanying Cabinet report 'Expansion of the Housing First Programme, August 2023)

Title	Risk description	Opp/ threat	Cause	Consequence	Date Raised	Owner	Gross		Current		Residual		Comments	Controls				
							I	P	I	P	I	P		Control description	Due date	Status	Progress %	Action Owner
Tenancy Sustainment	Tenants are evicted due to arrears, antisocial behaviour or other reasons	threat	Appropriate support not provided	Potential increase in rough sleeping	14/6/23	Ossi Mosley	3	3	3	2	3	1		Ensure Housing First services are delivered with a high fidelity to Housing First principles	31/3/24	In Progress	25	Brendan Lewis
Housing First acquisition	Properties are not suitable for HF tenants due to location, property type or other reasons	threat	Limited availability of suitable one bed properties	High failure rate of HF tenancies	14/6/23	Ossi Mosley	3	3	3	3	2	2		Review previous acquisition programmes with affordable development team. Work with Tenancy Management, Anti social behaviour and providers to manage any risk associated with certain locations.	31/3/25	In Progress	25	Brendan Lewis
Increase in demand for Housing First	Continual flow to the street leads to increasing demand for Housing First accommodation	threat	Cost of living and increasing housing affordability gap leads to an increase in homelessness and rough sleeping	Service unable to meet demand	14/6/23	Ossi Mosley	3	3	3	2	3	1		Ensure prevention work is increased across Housing Needs. Adopt a system wide approach to managing homelessness.	31/3/25	In Progress	10	Ossi Mosley

43

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To: Housing and Homelessness Panel
Date: 05 October 2023
Report of: Head of Housing Services
Title of Report: Housing Ombudsman Complaint Handling Code Self-Assessment

Summary and recommendations	
Purpose of report:	To inform panel members on the Council's self-assessment against the Housing Ombudsman's Complaint Handling Code.
Key decision:	No
Cabinet Member with responsibility:	Councillor Linda Smith, Cabinet Member for Housing
Corporate Priority:	Support Thriving Communities
Policy Framework:	Housing, Homelessness and Rough Sleeping Strategy 2023-28
Recommendation(s): That the Panel resolves to:	
1. Note the self-assessment and agree any recommendations.	

Appendices	
Appendix 1	Housing Ombudsman Complaint Handling Code – Self-Assessment

Introduction and background

1. The Housing Ombudsman Service was introduced by the Localism Act 2011 and from April 2013 it took over responsibility for all new complaints about social housing. This includes complaints about the Council's relationship as landlord to its tenants or leaseholders. The Local Government and Social Care Ombudsman covers complaints that do not relate to the landlord function.
2. The Housing Ombudsman launched its Complaint Handling Code in July 2020 and updated and strengthened the code in April 2022. Part of the code requires landlords to complete a self-assessment against the requirements of the code. The requirements of the code and the self-assessment have increased significantly since the code was first launched.

3. This report introduces the Council’s self-assessment against the Housing Ombudsman’s Complaint Handling Code.

The Self-Assessment

4. The self-assessment is grouped in eight themes and then split by mandatory requirement and best practice requirements. The eight themes are:
 - Definition of a complaint
 - Accessibility and awareness
 - Complaint handling personnel
 - Complaint handling principles
 - Complaint stages
 - Putting things right
 - Continuous learning and improvement
 - Self-assessment and compliance
5. There are 43 mandatory requirements that apply to the Council. The Council is fully compliant with 41 requirements, and of the remaining two, this report and the publication of the Annual Report 2023 will provide full compliance with the code. Once the Annual Report is published, we will update the self-assessment on the Council’s website.

Next Steps

6. Officers will continue to pursue any outstanding best practice requirements. The self-assessment will be carried out in summer 2024 and the findings will be reported to this Panel.
7. The self-assessment 2023 will be updated once the Annual Report is published.

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Background Papers: None

Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>'An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	This is defined within our online Comments, Compliments and Complaints procedure . Section titled <u>What is a complaint?</u> specifies: <i>'A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the Council, its staff, or those acting on behalf of the Council, affecting an individual citizen or group of citizens.'</i>
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Our residents do not have to use the word 'complaint' for it to be treated as such. This is defined within our online Comments, Compliments and Complaints procedure . Section titled <u>Who can make a complaint</u> specifies: <i>'The Council will accept complaints from anyone who has used or been affected by a service provided by or on behalf of the Council. The Council will also accept complaints from anyone who is acting on behalf of a service user with their knowledge and consent.'</i> <i>Anonymous complaints may be dealt with under this procedure at the discretion of the Council.'</i>
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Where there is a live complaint, customers can also raise multiple requests during the process of a complaint, prior to the investigation starting.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	As a landlord we do accept, log, investigate and respond to all complaints.
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	This is set out in our online Comments, Compliments and Complaints procedure . Section titled <u>What will not be treated as a complaint under this procedure</u>
1.9	If a landlord decides not to accept a complaint, a detailed 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.	Yes	To date we have had no situation whereby we have not accepted a complaint.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	This is defined within our online Comments, Compliments and Complaints procedure . section titled 'What is a complaint?' it states: <i>'Complaints and service requests can be closely related. The initial reporting of a fault will normally be treated as a service request and the Council will seek to resolve the issue outside of this procedure in the first instance. When assessing whether to treat a contact as a complaint or a service request each case will be considered on its individual merits and consideration may be given to the following factors'</i> As a landlord we do recognise the difference between a service request and a complaint. We follow the Housing Ombudsman definition on this matter.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	No	We will ensure that we provide information on how to make a complaint when we carry out future surveys e.g. the autumn 2023 STAR survey. We also gather real-time transactional satisfaction performance on completion of repairs & gas servicing, with direct interventions by team leaders/planners where satisfaction is less than required.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	This is defined within our online Comments, Compliments and Complaints procedure . Section titled. How to make a comment, compliment or complaint? provides detail on how to raise a complaint via: <ul style="list-style-type: none"> • Telephone • Online form • In person • In writing (to our Town Hall) • By email • Via a Councillor or MP The Council's Tenant Portal is due to go live in autumn 2023, with the functionality for tenants to raise a complaint, comment or compliment.
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	This is defined within our online Comments, Compliments and Complaints procedure . The procedure details: <ul style="list-style-type: none"> • Number of stages involved. • What occurs at each stage. • The timeframes of each stage.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	This is defined within our online Comments, Compliments and Complaints procedure . Section titled How to make a comment, compliment or complaint? By simply typing the word 'complaint' with in the search bar of www.oxford.gov.uk returns the necessary webpage on complaints that residents need.

2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	This is defined within our online Comments, Compliments and Complaints procedure . Section 'Reasonable Adjustments' specifies: <i>'Anyone is welcome to make a comment. Compliment or complaint and the Council is committed to treating everyone fairly. If a complainant requires any particular assistance the Council will tailor made this service to the complainants needs. This may include, for example, the provision of information in alternative formats (e.g. large print), the use of a language service, or communication through a representative'.</i>
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	This is defined within our online Comments, Compliments and Complaints procedure . Section <i>Ombudsman</i> As Landlord we produced a Complaints campaign leaflet in October 2022 with posters displayed in blocks and leaflets distributed by operatives carrying out repairs & services. Information on how to complain is also published in our tenant magazine, published monthly (digital via GovDelivery) and quarterly (hard copy to those that have not opted to receive the digital version).
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Contact information for the Housing Ombudsman is included in both Stage 1 and Stage 2 written responses to residents. This is defined within our online Comments, Compliments and Complaints procedure . Section <i>Ombudsman</i> which includes the contact details for the Ombudsman.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	Contact information for the Housing Ombudsman is included in both Stage 1 and Stage 2 written responses to residents.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	N/A	

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	Oxford City Council employed a Customer Care & Complaints Officer in October 2022. The officer is assigned to take responsibility of landlord related complaints.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The Customer Care & Complaints Officer does have appropriate skills and there are no conflicts of interest.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> be able to act sensitively and fairly be trained to handle complaints and deal with distressed and upset residents have access to staff at all levels to facilitate quick resolution of complaints have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	Our Customer Care & Complaints Officer make contact with the complainant once it has been logged, to better understand the complaint and to seek a fair and balance resolution from the outcome. The officer will also make reference to the Housing Ombudsman at this stage and establish if any reasonable adjustments need to be made.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and	Yes	A complaints system/log is in place to manage landlord complaints. The log keeps clear audit trail of correspondents between the complainant and landlord. The complaints system/log does not include any additional stages outside of the required two stage process.

	logged at stage one of the complaints procedure within five days of receipt.		
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Written acknowledgements contain a summary of the issues being complained about and the outcomes the resident is seeking. The initial contact between the Complaint Officer and the tenant also confirms the position.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Having recruited a Customer Care & Complaints Officer, this ensures that all complainants are treated in an unbiased fashion when contact is made.
4.7	The complaint handler must: <ul style="list-style-type: none"> deal with complaints on their merits act independently and have an open mind take measures to address any actual or perceived conflict of interest consider all information and evidence carefully keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	The Complaint Officer is independent of service areas and complies with this element. GDPR is considered at all stages and information sharing minimised to those who have access to the Complaints System/log.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	As a landlord we contact the customer and discuss frequency and preferred communication methods.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> set out their position comment on any adverse findings before a final decision is made. 	Yes	If a staff member is subject to a complaint, they will be interviewed by the Complaint Officer and they will have an opportunity to set out their position and comment on any adverse findings. As part of the response to a resident, they are given the opportunity to clarify or discuss the original findings before a final decision is made.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	This is defined within our online Comments, Compliments and Complaints procedure . Section titled <u>How your complaint will be dealt with</u> does specify the timescales of escalation if the complainant is not satisfied by the outcome.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	Where a complaint is not upheld, we clearly advise the customer how that outcome has been reached and offer them an opportunity to appeal or discuss further as part of our complaint response letter. In our online Comments, Compliments and Complaints procedure , we have set out the circumstances where we may reasonably refuse to escalate a complaint.
4.15	A full record must be kept of the complaint, any review, 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 reports or surveys prepared.	Yes	A Complaints system/log is in place for Landlord Complaints. This includes a record of complaints stage, date complaints received, deadlines (date & time) for stage responses/acknowledgement, status, outcome, as well as record of all correspondents between complainant and the Landlord.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from	Yes	This is defined within our online Comments, Compliments and Complaints procedure . Section titled <u>Reasonable and Unreasonable Behaviour</u>

	residents and/or their representatives when pursuing a complaint.		And section titled <u>Manage unreasonable behaviour and vexatious complaints</u> We also have Vexatious Guidance.
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	Customer Care & Complaints Officer contacts the complainant to fully understand the details of the complaint that has been raised. They will also be clear with the resident about complaints where the desired outcome of the tenant is unreasonable or unrealistic.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	Every effort is made to resolve complaints at the earliest opportunity, having due regard to the complexity of the case and any urgent issues are dealt with in a timely manner, where necessary, before the complaint response is sent out.
4.5	Landlords should 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 where this is reasonable.	Yes	Residents have the opportunity to have a representative deal with their complaint or to accompany them at any meeting.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	The Complaint Officer will clearly set out their understanding of legal obligations on each party.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We only list staff names if these names are identified by the tenants themselves and it is relevant to do so.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Investigation Officer establishes how regular contact is made with the complainant during the stage one investigation process.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.		
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	As a landlord we recognise the positive impact complaints have on future service delivery, which is supported through the investigation process. Appreciative enquiries and customer journey mapping has been carried out in areas where complaints have been raised. Learning from complaints is shared across service areas and in the example of day-to-day repairs, any learning is also shared with operatives through "toolbox talks."
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	If it is necessary to restrict contact with a resident, we will have due regard to the provisions of the Equality Act 2010 our Equality Duty, the protected characteristics of the resident and any reasonable adjustments that may be required.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	This is defined within our online Comments, Compliments and Complaints procedure . Section titled <u>How your complaints will be dealt with</u> This states that we will respond within 10 working days. Where there are exceptional circumstances and it is not possible to provide a response within 10 working days, we will inform the resident and provide a clear timeframe and explanation as to why.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	Written complaint responses are sent to the resident when the answer to complaint is known. Where there are any outstanding actions, these are listed within the written response with target dates. The Customer Care & Complaints Officer logs any outstanding actions and tracks these to completion by working with the relevant service area.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	As a landlord our complaints responses do address all points raised and provide clear reasons for the decisions.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> the complaint stage the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	We have adopted the Housing Ombudsman's template response letters, incorporating the requirements to ensure compliance.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	If the complainant is not satisfied by the response, then they are able to escalate the complaint to the second and final stage. If we declined to escalate a complaint where an exclusion ground applies, we would write to the resident to clearly explain the reasons and providing information on how the resident could approach the Housing Ombudsman about this decision.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Written acknowledgements contain a summary of the issues being escalated and the outcomes the resident is seeking. Further contact between the Complaint Officer and the tenant also confirms the position.

5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	All our Landlord Complaints are logged at first instance as a stage1 and do not start at a stage 2.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	This is defined within our online Comments, Compliments and Complaints procedure . Section titled <u>How your complaints will be dealt with</u> specifies: <i>Our stage 2 complaints are responded to by a Head of Service.</i>
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Our stage 2 complaints are responded to within the 20 working days, although we aim to provide the response in as short a time-frame as possible, following a thorough investigation by the Head of Service. Where there are exceptional circumstances and it is not possible to provide a response within 20 working days, we will inform the resident and provide a clear timeframe and explanation as to why.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions and <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	We have adopted the Housing Ombudsman's template response letters, incorporating the requirements to ensure compliance. We provide details of how the resident can escalate the matter to the Housing Ombudsman. As a landlord, we do not have a third stage to our complaints process.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	N/A	As a landlord, we do not have a third stage to our complaints process.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/A	As a landlord, we do not have a third stage to our complaints process.

Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	The Customer Care & Complaints Officer makes contact with the complainant to discuss an extension. Where this is agreed, this is confirmed in writing.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	If there was a disagreement to the extension, then the complainant will be provided with the Housing Ombudsman details.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	The Investigation Officer looks into the background details of all complaints and will carry out a balanced assessment at this stage.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	We do allow complainants the opportunity to add issues to their stage one complaint, if the original complaint as not yet been responded to.

55

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	The Customer Care & Complaints Officer makes contact with the complainant to discuss an extension. Where this is agreed, this is confirmed in writing.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	If there was a disagreement to the extension, then the complainant will be provided with the Housing Ombudsman details.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	As a landlord, we do not have a third stage to our complaints process.

5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	As a landlord, we do not have a third stage to our complaints process.
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Section 6 - Putting things right.

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes	Oxford City Council's complaints procedure is in place to effectively resolve disputes, by identifying what has gone wrong and the intended actions to put things right. This is evident from the investigating officer managing the next steps and outcomes until the complaint is fully resolved. The Service area affected where relevant will make the appropriate service improvements.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	We recognise where there are failings and manage the expectation of the complainants and what we are then able to deliver. Remedies include apologies, compensation, ex-gratia payments or a gesture e.g., charitable contribution
6.5	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	From the conclusion of the investigation remedies are identified where appropriate in agreement with the complainant and any remedies proposed are monitored through to completion.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	This is defined within our online Comments, Compliments and Complaints procedure . Section titled <u>Remedy</u> and specified: <i>If it is identified during the complaints process that a fault by the Council has directly caused personal injustice the Council will seek to offer a remedy that is proportionate and reasonable in view of the circumstances of the situation. This may include, for example, offering an apology, reviewing processes and procedures, or offering to compensate any financial loss resulting directly from the Council's actions.</i> We take into account the quantifiable losses to the complaint, which includes the time and trouble it has taken for them to complain when awarding compensation. We will also consider any statutory payments such as Home Loss, Right to Repair etc.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	We do look beyond the circumstances of the complainant and identify the complaint and how this impacts on residents as a whole. Appreciative enquiries and customer journey mapping has been carried out in areas where complaints have been raised and service failings have been identified.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where	Yes	We do seek advice from our Legal Services on the wording to use in complaint resolution where there may be a legal entitlement to redress alongside a complaint, e.g. where a disrepair claim may have been made at the same time as a complaint.

	possible, obtaining legal advice as to how any offer of resolution should be worded.		
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Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Partial	The Annual Report 2023 is scheduled for publication in September 2023 and provides learning from complaints. Further information on complaints is provided in the tenant newsletter. Planned activity will provide that learning and improvements are publicised on the Council's website. Complaints performance and learning is reported to the Housing & Homeless Panel (of the Scrutiny Committee).

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	No	There is an elected member of the Cabinet with responsibility for housing overall. Complaint handling performance is reported to the Housing and Homelessness Panel (of the Scrutiny Committee) which in turn is reviewed by the Scrutiny Panel and the Council.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	Complaint handling performance is reported to the Housing and Homelessness Panel (of the Scrutiny Committee) which in turn is reviewed by the Scrutiny Panel and the Council.
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	No	Further statistical data is required to enable detailed analysis. With day-to-day repairs, there is insight into trends regarding complaint themes, trades and actions/behaviours to drive improvement and satisfaction.

7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments. • take collective responsibility for any shortfalls identified through complaints rather than blaming others. • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	As a landlord we work collaboratively with other services and this is supported by having a Customer Care & Complaints Officer, who ensures positive cooperation between teams and service areas.
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	As a landlord, we will commit to carrying out a detailed annual self-assessment against to code to ensure our complaint handling remains in line with the requirements.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	As a landlord, we will adhere to this requirement as a result of a proposed restructure or procedure change.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members. • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents. • include the self-assessment in their annual report section on complaints handling performance 	No	<p>The self-assessment 2023 has been published on the Council's website.</p> <p>The Annual Report 2023 is to be published in September 2023 and will contain links to the self-assessment.</p> <p>The self-assessment will be reported to the Housing and Homelessness Panel (of the Scrutiny Committee) which in turn is reviewed by the Scrutiny Panel and the Council.</p>