Agenda



Housing and Homelessness Panel (Panel of the Scrutiny Committee)

This meeting will be held on:

Date: Thursday 10 October 2024

Time: **6.00 pm**

Place: Zoom - Remote meeting

For further information please contact:

Celeste Reyeslao, Scrutiny and Governance Advisor

Members of the public can attend to observe this meeting and.

- may register in advance to speak to the committee in accordance with the committee's rules
- may record all or part of the meeting in accordance with the Council's <u>protocol</u>

Information about speaking and recording is set out in the agenda and on the <u>website</u> Please contact the Committee Services Officer to register to speak; to discuss recording the meeting; or with any other queries.

Committee Membership

Councillors: Membership 6: Quorum 3: substitutes are permitted.

Councillor Lizzy Diggins (Chair)

Councillor Theodore Jupp

Councillor Edward Mundy

Councillor Asima Qayyum

Councillor Rosie Rawle

Councillor Anne Stares

Apologies and notification of substitutes received before the publication are shown under *Apologies for absence* in the agenda. Those sent after publication will be reported at the meeting. Substitutes for the Chair and Vice-chair do not take on these roles.

Agenda

		Pages
1	Apologies	
2	Declarations of Interest	
3	Chair's Announcements	
4	Notes of the previous meeting	7 - 14
	The Panel is asked to agree the notes of the meeting held on 03 July 2024 as a true and accurate record.	
5	Housing and Homelessness Panel Work Plan	15 - 16
	The Panel is asked to consider the Work Plan and agree any amendments.	
6	Housing Complaint Handling Annual Report 2023/24	17 - 36
	Cabinet, at its meeting on 13 November 2024, will consider a report from the Executive Director (Communities and People) seeking approval for the Housing Complaint Handling Annual Report 2023/24. Cllr Linda Smith, Cabinet Member for Housing and Communities, Nerys Parry (Head of Housing Services), Kat Mayes (Customer Care and Complaints Manager) and Bill Graves (Landlord Services Manager) have been invited to present the report and answer questions. The Panel is asked to consider the report and agree any recommendations.	
7	Temporary Accommodation and Homelessness Update	37 - 40
	The Head of Housing has provided an update for the Temporary Accommodation and Homelessness. Cllr Linda Smith (Cabinet Member for Housing and Communities), Nerys Parry (Head of Housing Services), Richard Wood (Housing Strategy and Needs Manager), Kieran Edmunds (Rapid Rehousing Manager) and Abi Bird (Housing Options Team Leader) have been invited to present the report and answer questions. The Panel is asked to consider the report and agree any recommendations.	

8 Dates of future meetings

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

- 07 November 2024, 6pm
- 04 March 2025, 6pm

Meetings will take place remotely via Zoom.

Information for those attending

Recording and reporting on meetings held in public

Members of public and press can record, or report in other ways, the parts of the meeting open to the public. You are not required to indicate in advance but it helps if you notify the Committee Services Officer prior to the meeting so that they can inform the Chair and direct you to the best place to record.

The Council asks those recording the meeting:

- To follow the protocol which can be found on the Council's website
- · Not to disturb or disrupt the meeting
- Not to edit the recording in a way that could lead to misinterpretation of the
 proceedings. This includes not editing an image or views expressed in a way that may
 ridicule or show a lack of respect towards those being recorded.
- 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.

*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.



Minutes of a meeting of the Housing and Homelessness Panel (Panel of the Scrutiny Committee) on Wednesday 3 July 2024



Committee members present:

Councillor Diggins (Chair)

Councillor Mundy

Councillor Rawle

Councillor Stares

Officers present for all or part of the meeting:

Nerys Parry, Head of Housing Services Richard Wood, Housing Strategy and Needs Manager Malcolm Peek, Property Services Manager Kieran Edmunds, Rapid Rehousing Manager Tom Porter, Senior Strategy and Service Development Officer Alice Courtney, Scrutiny Officer

Apologies:

No apologies were received

1. Declarations of Interest

None.

2. Chair's Announcements

The Chair welcomed new and returning Members of the Housing and Homelessness Panel.

Cllr Rawle joined the meeting.

3. Notes of the previous meeting

The Panel agreed the notes of the meeting held on 07 March 2024 as a true and accurate record.

The Panel noted the following updates from the previous meeting:

- Minute 39 the Landlord Services Transformation (Social Housing (Regulation) Act Compliance) item had been deferred to the October 2024 meeting.
- Minute 43 the Scrutiny Officer had highlighted the changes required to the governance elements of the Housing Ombudsman Complaint Handling Code Self-Assessment via the Landlord Services Manager, as requested.

 Minute 44 – the Landlord Services Manager had, via the Scrutiny Officer, circulated the additional information requested related to the Tenant Satisfaction (STAR) Survey.

The Panel agreed to consider items 7 (2024-25 Capital Programmes (HRA) Delegations), 8 (Annual Review of the Housing, Homelessness and Rough Sleeping Strategy 2023-28), 9 (Temporary Accommodation Demand and Mitigations) and 10 (Housing Performance Monitoring Q4 2023/24) next on the agenda, followed by items 5 (Housing and Homelessness Panel Work Plan), 6 (report back on recommendations) and 11 (dates of future meetings).

4. 2024/25 Capital Programmes (HRA) Delegations

Malcolm Peek, Property Services Manager introduced the report, which sought approval for the Housing Revenue Account (HRA) Capital Programmes for 2024/25. The budget for the HRA Capital Programmes was agreed by Full Council in February 2024; the funds were for Capital works programmes for Council-owned housing stock. The works were divided into three programmes as set out in the report: internal, external and communal; the programmes would enable the Council to maintain the quality of property standards in its housing stock for 2024/25. A five-year Capital Programme was in development to commence from 2025/26; this was a one-year interim programme while the five-year programme was finalised. The intention was that the programmes in 2024/25 would be predominantly delivered by Oxford Direct Services (ODS).

In response to questions, the Panel was advised that:

- The Capital works would be prioritised from a stock condition basis, with housing stock in the worst condition being prioritised; a stock condition survey was currently being carried out which would inform the Capital works and prioritisation of them.
- Given the stock condition survey would not be completed until March 2025, prioritisation of works would take place on a rolling basis during 2024/25 as and when more was known about stock condition.
- Some Capital works to Council housing stock would be undertaken simultaneously with other more responsive repairs, where appropriate to do so.
- Planning of the delivery of Capital works was predominantly undertaken by the contractor, which was anticipated to be ODS.
- The Council held asset management information on Council housing stock which set out life expectancy data for various elements in any given property; this alerted the Council to when elements needed to be replaced/updated (e.g. kitchen or bathroom). Delivery of Capital works was informed by this asset management information.
- Damp and mould issues were generally considered under a separate workstream to the Capital works, however the Council took a holistic view when entering properties, so any damp or mould issues should be picked up and addressed if found during a visit for Capital works.
- Taking a holistic view of properties helped to ensure less inconvenience for tenants due to fewer visits being required to the property; it also allowed for more effective and efficient delivery for the Council/contractor.
- The report was very high-level; more detail in terms of specific programmes and stock condition management sat at the service level.

- The Council worked closely with ODS in terms of support and any lessons learned from delivery.
- The results of the stock condition survey would feed into the longer-term fiveyear programme which was being developed.
- Work on obtaining EPC Certificates for Council housing stock was a separate piece of work to this, but when Capital works were completed the Council reassessed the EPC on the property.

The Panel noted the report; there were no recommendations.

Malcolm Peek, Property Services Manager left the meeting and did not return.

5. Annual Review of the Housing, Homelessness and Rough Sleeping Strategy 2023-28

Richard Wood, Housing Strategy and Needs Manager introduced the report, which provided an update on the progress made in Year 1 of the Housing, Homelessness and Rough Sleeping Strategy 2023-28 and sought Cabinet approval for implementation of the Year 2 action plan. The Panel was provided with a brief overview and background to the Housing, Homelessness and Rough Sleeping Strategy 2023-28 and advised that the 'Emerging Risks and Challenges' section of the report was particularly key given current demand pressures on Housing Services. The Year 2 action plan sought to address those emergent risks and challenges.

In response to questions, the Panel was advised that:

- The action plan would be reviewed regularly in consultation with the Cabinet
 Member for Housing and Communities to monitor and report on progress against
 the commitments in the strategy and delegated authority would be sought to
 revise the action plan throughout the year in response to emerging priorities; the
 action plan would continue to be reported on annually to Cabinet and Scrutiny
 which would allow for oversight and scrutiny on an annual basis.
- The Head of Housing Services would seek clarification on the Council's intended approach, definitions and timescales in relation to First Homes and affordable homes and report back to the Panel.
- The Year 2 action plan would be RAG-rated throughout the course of the year in accordance with progress made in delivering the actions.
- Officers would include the previous year's action plan in future subsequent annual review reports to allow progress to be considered from year-to-year.
- The Council was responsible for discharging funding for the Home Upgrade Grant (HUG2) grant; the Head of Housing Services would seek clarification on current uptake/spend and report back to the Panel.
- The Council had seen a large increase in demand for Temporary
 Accommodation, however there had been a decrease in length of stay due to a
 concerted focus being placed on faster move-on from Temporary
 Accommodation.
- Housing First was primarily aimed at rough sleepers rather than those requiring Temporary Accommodation; rough sleepers were a separate client group to those requiring Temporary Accommodation.
- The Head of Housing Services would provide an update after the meeting on the implementation of the Panel's recommendation on the strategy from the previous year, which was accepted in part by Cabinet: 'That the Council works with OX

- Place to consider how it might move towards having a higher percentage of new homes let at social rent level than a simple majority.'
- Work was underway in relation to the asset management strategy referenced in the report; there would be the opportunity for Scrutiny and wider Member input into that document. The asset management strategy and the HRA Business Plan were interlinked and aligned to the budget-setting process; it was anticipated that both documents would be submitted to Cabinet in December 2024 and could be reviewed by Scrutiny beforehand in the usual way.
- Tenant engagement had already commenced in relation to the asset management strategy and HRA Business Plan.
- The Year 2 action plan would be updated where officers had left the organisation.
- A comparison of the Year 1 action plan versus the Year 2 action plan could be shared with the Panel in due course; officers would need to consider an appropriate format for this.

The Panel requested that:

- The Head of Housing Services provide a written update on the Council's intended approach, definitions and timescales in relation to First Homes and affordable homes.
- The Head of Housing Services provide a written update on current uptake/spend in relation to the HUG2 grant.
- The Head of Housing Services provide a written update on the implementation of the Panel's recommendation on the strategy from the previous year: 'That the Council works with OX Place to consider how it might move towards having a higher percentage of new homes let at social rent level than a simple majority.'
- The Housing Strategy and Needs Manager provide a written comparison of the Year 1 and Year 2 action plans.

The Panel noted the report; there were no recommendations.

6. Temporary Accommodation Demand and Mitigations

Richard Wood, Housing Strategy and Needs Manager introduced the report, which provided an update on increasing levels of homelessness use of Temporary Accommodation and mitigations in Oxford. The rapidly rising demand for Temporary Accommodation presented a significant risk to Council finances and the mitigations sought to reduce Temporary Accommodation use in the months and year ahead and reduce the considerable financial risk to the Council. The trends in Oxford mirrored those in neighbouring local authorities and nationally.

Kieran Edmunds, Rapid Rehousing Manager, provided a summary of the mitigations which were proposed and those which had already been implemented.

In response to questions, the Panel was advised that:

- Housing Services worked closely with colleagues in the Anti-Social Behaviour teams to manage issues and conflicts at Temporary Accommodation sites, including those in residential areas.
- The Council was sympathetic to the concerns of residents in terms of the impact of Temporary Accommodation sites on the wider community, but it was a challenge given the significant demand for Temporary Accommodation.

- There were established procedures in place for instances where those in Temporary Accommodation breached their licence.
- Members could contact Richard Wood, Housing Strategy and Needs Manager to discuss any specific casework outside of the meeting.
- Demand for Temporary Accommodation related to those whom the Council had
 a statutory duty to provide Temporary Accommodation for, which was assessed
 on a case-by-case basis in accordance with relevant legislation; those who did
 not meet the threshold for the statutory duty may therefore end up rough
 sleeping longer-term, however there was other provision for rough sleepers –
 separate to Temporary Accommodation.
- Long-term rough sleepers often had very complex needs; it could take a long time to resolve issues and get those rough sleepers into suitable accommodation for the long-term.
- Consideration had been given to the impact on Council housing stock of redesignating existing stock as Temporary Accommodation.
- If the proposals set out in the report were agreed by Cabinet, Housing Services would get dedicated officer capacity to engage with residents to ensure that provision of Temporary Accommodation was done in the best way possible.
- The mitigations would cost the Council a significant amount of money, but when compared with the current significant cost of Temporary Accommodation (e.g. hotels) it was a much smaller amount of money.
- Officers monitored the balance of Council housing stock for different needs on a monthly basis; it was a fine balance that the Council wanted to get right.

The Panel noted the report; there were no recommendations.

Kieran Edmunds, Rapid Rehousing Manager left the meeting and did not return.

7. Housing Performance Monitoring Q4 2023/24

The Head of Housing Services had submitted a Housing Performance report for Q4 2023/24.

In response to questions, the Panel was advised that:

- Homelessness Prevention Duties and the rise in demand for Temporary Accommodation were linked; Prevention Duty outcomes had worsened as the Council was focusing more on the latter stages of homelessness as a result of reduced capacity due to the sheer demand for Temporary Accommodation.
- Homelessness prevention activity such as landlord mediation was less successful in the current climate, as landlords were required to increase rents due to rising inflation.
- Sourcing affordable accommodation for those who were evicted was extremely difficult.
- The Council was investing in its Prevention teams in 2024/25, which would help improve Prevention Duty outcomes as staff caseloads would reduce; improvements had already been seen in the first three months of 2024/25.

Cllr Stares left the meeting and did not return.

 The Home Office had sped up its decision-making process in relation to asylum claims, which meant that asylum seekers were evicted from Home Office hotels much quicker; asylum seekers then presented to the Council and the Council had to undertake the usual statutory tests in relation to priority need and duty to house them.

- The Council continued to make representations to the Government in relation to funding for Temporary Accommodation.
- As part of the Social Housing Decarbonisation Fund (SHDF) work, the Council
 had found that more Council housing stock than initially expected already had an
 EPC C; this was good news, but also made those properties ineligible for
 decarbonisation measures through SHDF.
- The mitigations which had been put in place around re-let times had only been implemented very recently; it was hoped that improvements would be visible when the Housing Performance report was next submitted to the Panel for consideration. The Head of Housing Services would attempt to separate out the historical data from the current position so that improvements could be more clearly identified.

The Panel requested that:

 The Head of Housing Services provide a written update on the total standard relet time before the next meeting.

The Panel noted the report; there were no recommendations.

Nerys Parry, Head of Housing Services, Richard Wood, Housing Strategy and Needs Manager and Tom Porter, Senior Strategy and Service Development Officer left the meeting and did not return.

8. Housing and Homelessness Panel Work Plan

The Scrutiny Officer introduced the item; a provisional Work Plan and suggestions for the longlist of Scrutiny-commissioned reports for 2024/25 were included within the agenda pack. A number of items from the longlist had already been scheduled into the Work Plan.

Since the agenda had been published, two new suggestions had been made for Scrutiny-commissioned items, which the Panel requested the Scrutiny Officer schedule into the 2024/25 Work Plan:

- Housing First Update
- Regular performance information relating to Temporary Accommodation and Homelessness

In response to questions, the Panel was advised that:

- The Selective Licensing Implementation (Year 2) item could not be reported on in 2024/25 due to the reporting timeframe; the Year 2 reporting was required to be done after the end of the 2024/25 financial year.
- The item agreed in 2023/24: 'Housing Associations' Approach to Tenant Engagement' was unlikely to be feasible for consideration in 2024/25 due to capacity constraints within Housing Services; however the Scrutiny Officer would include the item on the list of suggestions for 2025/26 so that it could be kept under consideration.

The Panel agreed the Work Plan as set out in the agenda pack, noting that the Scrutiny Officer would seek to schedule in additional items as detailed above.

Cllr Jupp left the meeting and did not return.

9. Report back on recommendations

The Panel noted that, at its meetings on 13 March 2024 and 12 June 2024, Cabinet considered recommendations related to the following reports, responses to which were set out in the agenda pack:

- Allocation of Preventing Homelessness Budget 2024/25
- Housing Ombudsman Complaint Handling Code Self-Assessment
- Implementation of Selective Licensing

Cllr Mundy advised that he had a contact for a Tenants' Union (Acorn) which he could share in support of the Panel's recommendation: 'That the Council rolls out a Selective Licensing scheme communications campaign aimed at tenants to raise awareness of the scheme and tenants' rights; and actively engages with tenants unions as part of the campaign.' Cllr Mundy confirmed that he would liaise with the Scrutiny Officer after the meeting.

In response to questions, the Panel requested that the Scrutiny Officer:

- Seek confirmation that the tenant communications campaign in relation to Selective Licensing would include accessible and inclusive communications, including forms of communication which were not digitally based.
- Seek confirmation in relation to what would happen if the Severe Weather Emergency Protocol budget was not sufficient to cover costs in any given year; and whether there was any contingency funding.

10. Dates of future meetings

The Panel noted the dates and times of future meetings.

The Panel noted that there was currently no business for the meeting scheduled for 07 August 2024 and agreed to cancel the meeting, subject to no urgent relevant items being added to the Forward Plan.

The meeting started at 6.00 pm and ended at 7.39 pm

Chair	Date: Wednesday 7 August 2024

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.



\genda Item 5

[Provisional] 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 and Governance Advisor 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.

10 October 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 an opportunity for discussion; and to agree any recommendations.	Cabinet Member for Housing and Communities	Nerys Parry, Head of Housing Services
Housing Complaint Handling Annual Report 2023/24	Yes	To receive a report on the handling of landlord complaints for the year 2023-24.	Cabinet Member for Housing and Communities	Nerys Parry, Head of Housing Services

07 November 2024 – provisional reports

Agenda item	Cabinet item	Description	Cabinet portfolio	Lead officer
Housing Performance Monitoring (2024/25	No	To consider the Housing Performance Report and agree any recommendations.	Cabinet Member for Housing and Communities	Nerys Parry, Head of Housing Services

mid-year)				
Implementation of Refugee Resettlement in Oxford	No	To consider the report and agree any recommendations.	Cabinet Member for Housing and Communities	Nerys Parry, Head of Housing Services
Housing Complaint Handling Performance (Q1 & Q2 2024/25)	No	To consider the report and agree any recommendations.	Cabinet Member for Housing and Communities	Nerys Parry, Head of Housing Services
Council of Sanctuary Framework	Yes	Cabinet report to seek approval of the Council of Sanctuary framework and authorisation to apply for Council of Sanctuary Award status.	Cabinet Member for Housing and Communities	Peter Matthew, Executive Director (Communities and People)

06 March 2025 – provisional reports

Agenda item	Cabinet item	Description	Cabinet portfolio	Lead officer
Housing and Carbon Reduction	No	To receive a presentation followed by an opportunity for discussion; and to agree any recommendations.	Cabinet Member for Housing and Communities	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 and Communities	Nerys Parry, Head of Housing Services
Tenant Satisfaction (STAR) Survey	No	To consider the report and agree any recommendations.	Cabinet Member for Housing and Communities	Nerys Parry, Head of Housing Services



Annual Complaint Performance & Service Improvement Report 2023/24

(Housing)

Contents

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Introduction

As of 1st April 2024, the Housing Ombudsman's new Complaints Handling Code came into force, with a focus on greater transparency and accountability for providers of social housing.

The Social Housing (Regulation) Act 2023 granted new statutory powers to and placed statutory duties on the Housing Ombudsman.

The Regulator of Social Housing was also provided with additional powers to regulate and set out a new, more stringent set of Consumer Standards. One of the Consumer Standards, the Transparency, Influence and Accountability Standard set out that landlords must deal with complaints in a manner aligned with the Housing Ombudsman's Code. These requirements mean that it is more important than ever to ensure we have a robust approach to handling complaints, learning from them. implementing improvements, and publishing the data around this.

As part of the Housing Ombudsman's requirements for landlords, we now complete and publish our Complaints Handling Code Self-Assessment (link below) and produce this annual report to share our findings, successes, and lessons learned with the Ombudsman, the Council Members, and most importantly, our residents.

This report covers the period from 1st April 2023 to 31st March 2024, and encompasses all complaints relating to the services Oxford City Council (or those acting on our behalf) provide as a landlord. This does not include complaints regarding homelessness, housing benefit, or any other Local Authority functions that would come under the remit of the Local Government & Social Care Ombudsman.

These complaints may have come from tenants, shared owners, leaseholders. private residents, or third parties acting on behalf of any of those. The complaints were handled by either the Customer Care & Complaints team within Landlord Services or, where appropriate, by our contractor, ODS, on our behalf.

Further information on complaints

Our annual self-assessment against the Housing Ombudsman's Complaint Handling Code: https://www.oxford.gov.uk/downloads/file/1021/housing-complaint-handlingcode-self-assessment

Further information on our complaints procedure and how to make a complaint can be found here: https://www.oxford.gov.uk/comments-compliments-complaints

Information and support regarding complaints can be found on the Housing Ombudsman's website: https://www.housing-ombudsman.org.uk/

Definition of a complaint

Based on the requirements of the Housing Ombudsman's Code, Oxford City Council defines a complaint as:

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.

Service requests made for the first time and reports of anti-social/nuisance behaviour are not considered to be complaints for the purpose of our procedure. Complaints about Councillors, or about Freedom of Information and Subject Access Requests are subject to their own separate procedures and are also not included. We may also not consider complaints where the issue has already been addressed in a previous complaint, or regarding incidents that occurred more than 12 months ago. More information on what is and is not a complaint can be found on our website.

The complaints process

A resident or their representative can make a complaint by telephone, by email, via our website, by post, or by speaking to their Tenancy Management Officer or other member of staff. It is not necessary to use the word 'complaint', as it is our duty to recognise an expression of dissatisfaction that meets the criteria and offer to record it as such.

We have a two-stage process, as set out in the Housing Ombudsman's Code.

Stage 1

At Stage 1, the Code instructs us to acknowledge the complaint within 5 working days. This acknowledgement will set out our understanding of the complaint, what the complainant is looking for as a resolution, provide the date by which they can expect a response, and provide the contact details of the Housing Ombudsman.

The Code says we are to respond within 10 working days, and in this response we explain how we have investigated the complaint, set out our findings, confirm any action taken, state whether it has been upheld or not, offer compensation where appropriate, and detail what any next steps are, including how they can escalate to Stage 2. We also include the details of the Housing Ombudsman again.

We are permitted to use extensions when necessary, but this must be no more than 10 working days without good reason. Extensions may be required if it is a particularly complex case, if visits need to be arranged, if we need input from someone on annual leave, or if we are awaiting further information or evidence from the complainant. We will always explain why an extension is required.

Stage 2

If someone is unhappy with the response they received at Stage 1, or if we fail to do what we agreed to do as part of the resolution offered, they can ask for their complaint to be considered at Stage 2 where it will be reviewed by someone more senior.

At Stage 2, the Code says we are to acknowledge the complaint within 5 working days. This acknowledgement will follow the same format as the one at Stage 1, as well as including confirmation as to why the complainant has escalated the complaint to Stage 2 (if known), and it will state if there are any issues from Stage 1 that have been resolved and don't require further investigation.

The Code allows us 20 working days to respond at Stage 2. In this response we will explain the outcome of our review and any additional investigation, as well as including any changes to the outcome and proposed resolution. Again, the details of the Housing Ombudsman are provided along with confirmation that they have completed the final stage of our internal process and can approach the Housing Ombudsman should they remain dissatisfied.

We are permitted to use extensions when necessary, but this must be no more than 20 working days without good reason. Extensions may be required for the same reasons given above. Again, we will always explain why an extension is required.

Housing Ombudsman

We are required by law to be part of the Housing Ombudsman scheme and comply with their Code. As part of this, we have to publish an annual self-assessment of our compliance with the Code, as well as this report. Annual reports need to include details of all our determinations and orders made by the Housing Ombudsman against the Council in the year.

If we fail to meet our membership conditions, including following the Code, they can: issue a Complaint Handling Failure Order; report us to the appropriate regulator (this would be the Regulator of Social Housing for most complaint issues); and they can publish the details of the failure on their website and publicly via press releases.

The Housing Ombudsman require that a complaint has completed our internal process or has been declined for investigation by us before they will take the case. They may contact us to confirm that a complaint has been through Stage 2, or ask us to escalate it if it hasn't. They can also give us a deadline to provide a final response.

During their investigation, the Ombudsman will request evidence from us which we are obliged to provide. They may decide that the complaint sits outside of their jurisdiction and/or refer a case to the Local Government & Social Care Ombudsman. If they have identified a solution that could quickly resolve the issue, they can propose this, or they may suggest mediation.

Following an investigation, the Housing Ombudsman will issue a determination. They will decide if there has been a service failure, maladministration, or severe maladministration, or if they are satisfied with the actions we have taken. They can issue various orders, including instructing us to:

- Apologise to the complainant
- Pay compensation to the complainant
- Takes action to put things right
- Stop doing something they think we should not do
- Review our policies and practice.

We have to provide evidence to the Ombudsman that we have complied with their orders. If we fail to do as they ask, they can refer us to the relevant regulator, publish the details of our failure to comply, issue a Complaint Handling Failure Order, and/or apply to the Secretary of State to have their order enforced as if it were a court order.

Performance

The following sections detail our complaints performance in 2023/24.

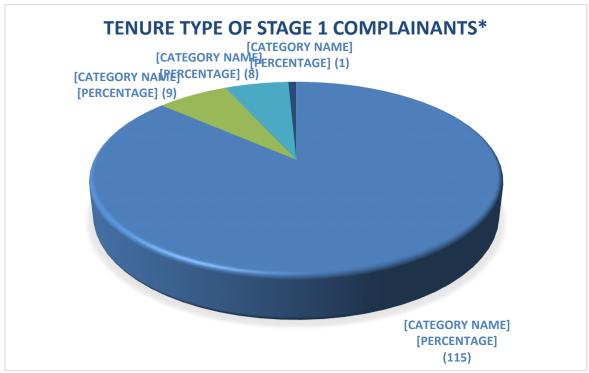
Stage 1

From 1st April 2023 to 31st March 2024, we handled the following number of complaints at Stage 1:

Stage 1 Complaints Handled by the Council	134
Stage 1 Complaints Handled by ODS	431
Stage 1 Complaints Total	565

In addition to the Stage 1 complaints handled by the Council, one was rejected as it was about a County Council issue, and one was withdrawn. ODS did not record if cases were rejected or withdrawn, and these are counted in their figures as 'Not Upheld'.

The chart below shows that 86% of the complaints handled within the Council came from tenants, with leaseholders and shared owners at 7% and 6% respectively, and complaints from private residents making up only 1%.



^{*} This is taken from complaints handled by the Council. ODS do not have records of the tenure type of the person making the complaint.

Stage 1 complaints by service area

Overall, 59% of Stage 1 complaints were upheld, with 41% not upheld. Of these, within ODS 58% were upheld, and within the Council 61% were upheld.

	Total	Number Upheld
ODS	431	252
Property Services – Repairs & Maintenance	46	31
Tenancy Management	64	39
Anti-Social Behaviour	8	4
Home Ownership	5	3
Property Services – Other	5	1
Legal Services	3	2
Development/OX Place	1	1
Contact Centre	1	1
Involvement	1	0

Stage 1 timescales

Of the Stage 1 cases handled by the Council, 31 were responded to using an extension to the target date. Reasons for this include delays in getting a response from the relevant department, awaiting reports from external contractors, staff leave/sickness absence, and awaiting further information from the complainant.

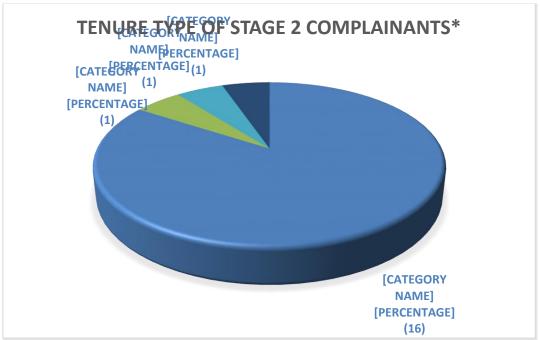
94.6% of Stage 1 complaints handled by the Council were responded to within the Housing Ombudsman's Complaint Handling Code timescales.

Stage 2

From 1st April 2023 to 31st March 2024, we handled the following number of complaints at Stage 2:

Stage 2 Complaints Handled by the Council	19
Stage 2 Complaints Handled by ODS	11
Stage 2 Complaints Total	30

The chart below shows that 84% of the complaints handled at Stage 2 within the Council came from tenants, with very few from shared owners, leaseholder or private residents.



^{*} This is taken from complaints handled by the Council. ODS do not have records of the tenure type of the person making the complaint.

Stage 2 complaints by service area

Overall, 83% of Stage 2 complaints were upheld, with 17% not upheld. Of these, within ODS 82% were upheld, and within the Council 84% were upheld.

It should be noted that many of these will have already been upheld at Stage 1 but were escalated to Stage 2 for reasons such as seeking further compensation or repairs agreed not having been completed. It does not necessarily indicate that the Stage 2 conclusion disagreed with the Stage 1 decision.

	Total	Number Upheld
ODS	11	9
Property Services – Repairs & Maintenance	10	8
Tenancy Management	8	8
Home Ownership	1	0

Stage 2 timescales

Of the Stage 2 cases handled by the Council, two were responded to using an extension to the target date. The reason for this was that we were awaiting reports from external organisations.

100% of Stage 2 complaints handled by the Council were responded to within the Housing Ombudsman's Complaint Handling Code timescales.

Housing Ombudsman Outcomes

Whilst we received enquiries and evidence requests from the Housing Ombudsman in 2023/24, we did not receive any determinations following investigations.

We did, however, receive our first Complaint Handling Failure Order (CHFO) (see below). Whilst we are very sorry this happened, especially to the resident involved, this highlighted the need for improvements in our complaints handling and gave us the opportunity to review our service. This case ultimately went to the Housing Ombudsman for investigation, and a determination was received in the first quarter of 2024/25 so will be included in next year's report.

On 17th July 2023, the Housing Ombudsman issued a Type 1 CHFO. This was one of 51 CHFOs issues by the Ombudsman in that quarter. A Type 1 order is issued 'where an individual complaint is not being progressed through the landlord's complaints process'.

We failed to issue a response to the tenant within the stated timeframe, even after the Ombudsman reminded us of our responsibilities. Once the Ombudsman issued the CHFO, our actions were investigated by Senior Management and Directors within both Oxford City Council and our contractors, ODS. We identified where things had gone wrong, and we looked at what steps could be taken to prevent a similar issue in future. Many of the improvements we talk about later in this report were identified as part this review.

Our CHFO was included in the Housing Ombudsman Service Quarterly Report: Complaint Handling Failure Orders issued July to September 2022, which can be found here: https://www.housing-ombudsman.org.uk/app/uploads/2022/11/CHFO-report-Q2-22-23-final.pdf

You can search decisions published by the Housing Ombudsman on their website: https://www.housing-ombudsman.org.uk/decisions/

Trends and challenges

National trends

Across the Housing sector, there has been an increase in complaints received over the last few years. Traditionally within housing providers, most complaints have been regarding repairs and maintenance, and that has continued to be the case as it is the most common type of interaction that residents have with us as a landlord.

Complaints about damp and mould have continued to increase throughout the sector, as residents are increasingly aware of the risks following the tragic death of Awaab Ishak and the subsequent scrutiny of how landlords should respond to reports of damp and mould.

Our key themes

We have observed the following trends and challenges regarding the complaints received in 2023/24:

Damp & Mould

Complaints about the handling of damp and mould reports have increased, with 26 of the 134 Stage 1 complaints handled by the Council including damp and mould as a main issue, and 5 of the 19 cases at Stage 2.

Communication

The majority of complaints received by ODS and the Council have been regarding levels of service and communication. ODS have identified that communication issues are more prevalent where there is a subcontractor involved.

Communication was also a factor in 19 of the 65 Stage 1 complaints about Tenancy Management. 10 of these were upheld, suggesting that there are improvements we can make around communication, not just in Tenancy Management but across services areas.

In a 24/7 world, there is an expectation of an almost immediate response to queries or complaints, and we will be working to help manage those expectations by acknowledging e-mails more thoroughly, setting out expected response times and keeping in touch with tenants where there may be a delay in responding in full.

Repair Delays

A significant number of complaints for ODS and Property Services included concerns about the time taken to compete repairs. Reasons for this included needing to order materials, the procurement of specialist contractors/subcontractors, waiting for a surveyor visit, or delays in getting approvals for work to proceed. ODS have observed that the requirement for asbestos surveys can also be a factor in complaints regarding delays to repairs being carried out.

There were also a number of cases where the delays were caused by the resident disputing the work planned, difficulties with gaining access to the property, or because we were unable to contact the resident.

Complaint Handling

Both ODS and the Council have had incidents during 2023/24 where complaints had been logged incorrectly so were not picked up.

There was also an issue where for a short time complaint forms submitted via our website with large attachments were not received by the relevant teams, even though an acknowledgement was issued to the complainant.

Both of these issues have been addressed.

The recording of complaints on our systems is still new and evolving and with that, we expect to be able to provide much more insightful information in future, with consistent, clear reporting. As improvements progress and working practices are standardised across services and the Council as a whole, we will be able to accurately provide more detailed information on areas such as the key themes and compensation awarded.

Tenant Satisfaction Measures (TSMs)

Our 2023 Tenant Satisfaction Survey (which can be found here https://www.oxford.gov.uk/downloads/file/3403/tenant-satisfaction-survey-results-2023) showed that of those who said they'd made a complaint, only 33% were happy with the handling of it. This was a considerable drop from the score of 66% in the 2022 survey and is naturally not the result that we want.

Housemark have benchmarked our results against other Local Authorities. Comparing our results with theirs, our figure for satisfaction with complaints handling puts us in the third quartile. However, the top quartile result was only 35%, demonstrating that similar organisations are experiencing similar levels of dissatisfaction.

Whilst we cannot always offer the outcome a complainant is looking for, we would always want them to feel that their complaint had been taken seriously, that they had been treated with empathy, and that they received a clear, thorough and timely response.

It may be that in these cases where there was dissatisfaction, they didn't feel they got the level of service they should expect or were dissatisfied with the outcome. We plan on implementing measures to ensure we get feedback from residents following a complaint so we can understand why people are dissatisfied.

There may also be other reasons for the low level of satisfaction with complaint handling shown in the survey. We need to ensure we are recognising complaints and logging them as such, to avoid situations where a resident may think they have made a complaint, but we don't have a record of it, as may have happened in some of these cases.

It may also be that there is often confusion around what is and isn't a complaint, so a respondent may actually have been unhappy following a report of anti-social behaviour, for example. They might term this as a complaint, but it wouldn't meet our criteria to be handled within our complaints process. Regardless, we are making improvements to try to ensure a better service is provided moving forward.

<u>Learning & service development – what we've done in 2023/24</u>

Whilst responding to the issues raised in a complaint is important, ensuring we learn from them is also a priority. Many people who contact us with a complaint ask for assurances that we will make improvements so something positive can come out of their experience. Learning from complaints is not just our statutory duty, it is a commitment we make to citizens that they will be heard, and their views will help shape our services.

Landlord Services Customer Care & Complaints Team

In preparation for the new version of the Housing Ombudsman Complaint Handling Code that came into effect on 1st April 2024, in 2023/24 we made many changes in how we handle complaints about our landlord function.

- We have reviewed the format of our letters to ensure that:
 - We include a clear definition of the complaint, explaining our understanding of what it is about and what the complainant wants as an outcome
 - The details of the Housing Ombudsman are provided at every opportunity so that residents understand their right to seek further help and advice
 - We avoid including irrelevant information and jargon in our outcome letters.
- We have worked closely with our counterparts at ODS to ensure we have a consistent approach to handling complaints, regardless of whether it is handled directly by the Council or by ODS on our behalf. This includes ensuring ODS use formal extensions if they need more time, provide the Housing Ombudsman's contact details, and give clear instructions on how a complaint can be escalated to Stage 2.
- In order to ensure investigations are independent and coordinated within one place, a Customer Care & Complaints team was created within Landlord Services. This included the appointment of a Customer Care & Complaints Manager to oversee our compliance, review complaints at Stage 2, coordinate responses to the Housing Ombudsman, and monitor learning and improvement. There is also a Customer Care & Complaints Officer responsible for Stage 1 complaints. Our Tenant Ambassadors took part in the interviews during the recruitment process for these roles.
- We were part of a project within the wider Council for all complaints to be logged and responded to via our CRM (Customer Relationship Management) system, ensuring greater oversight and more comprehensive record keeping. This project was undertaken in 2023/24 and went live on 1st April 2024.

- Training has been carried out with our Surveyors, the Homelessness Prevention team, the Tenant Management team, the Community Response team, and the Anti-Social Behaviour Investigation team on recognising complaints, logging them, and the process.
- Weekly meetings now take place between those handling housing-related complaints, ODS' complaints handlers, and the team handling complaints for other Council services to share best practice, discuss challenges, and provide a consistent approach.
- All correspondence from the Housing Ombudsman is automatically sent to senior management, to allow for greater oversight. Arrangements have also been made for greater collaboration between the Customer Care & Complaints Manager and the Ombudsman Link Officer, to ensure responses are thorough and timely.
- Complaints are now responded to from within the Customer Care & Complaints team. This helps ensure accurate records and an independent, evidence-led investigation. Decisions on whether a complaint is upheld or not are taken within the Customer Care & Complaints team, rather than by the team involved in the complaint.

Property Services

- A system was set up to track repairs related to complaints, with weekly meetings between the Surveyors, ODS, and the Customer Care & Complaints Team to review the progress.
- The Customer Care & Complaints team took part in a project to help design a process for effectively managing complaints relating to building safety in high rise blocks.
- Surveyors have been made aware of the importance of providing evidence as part of an investigation and have been instructed to ensure reports are written for every complaint visit with accompanying photographs.
- Following it being frequently referenced in complaints, ODS and Surveyors have been reminded of the importance of making appointments in advance.
- A specialist Damp & Mould Surveyor was appointed to handled more complex cases, and we have an independent damp and mould contractor to support us in addressing the underlying causes, where necessary.

ODS

- ODS have implemented their text messaging system, which informs tenants
 of appointment dates, send on-the-day reminders, and lets them know when
 - the Operative is on their way. The tenant can also liaise directly with the Operative. ODS have recorded a drop in the number of complaints they have received. They feel this is likely to be down to improvements they have made to ensure issues are identified and resolved quickly.
- Regular review meetings have been held to ensure that work carried out by subcontractors is monitored and of the expected standards.
- Further instruction has been provided to Operatives to ensure they are closing down jobs correctly to ensure any follow-on work required is not missed.

Tenancy Management

- Redirection on our CRM system is now being used so that tasks aren't missed when a staff member leaves, and their work can be easily transferred to their replacement.
- The Mutual Exchange process has been reviewed to ensure that everything is verified at the early stages, and further training has been provided to Tenancy Management Officers on this.
- We are using our CRM system to record contact with our residents and to assign actions to the appropriate person. This results in more thorough record-keeping, better communication, and makes it clear who is responsible for the next step.

Plans for 2024/25 and beyond

As of 1st April 2024, the new version of the Housing Ombudsman's Complaint Handling Code came into effect, alongside new statutory powers for the Ombudsman. In conjunction with new regulatory standards, the focus is on ensuring complaints are handled appropriately and that the customer's voice is heard and is stronger than ever. The expectations for us as a landlord are high, and we will do everything we can to meet those, not just in terms of our handling of complaints but how this results in improvements to our services.

We expect the volume of complaints to continue to increase as residents become increasingly aware of their rights, and as we continue to create an environment where complaints are recognised, recorded and welcomed as an opportunity to put things right.

Many organisations find that as confidence in their ability to competently handle complaints increases, so does the volume they receive, without there having been any change in the level of service. Therefore, we don't see this increase as a negative thing, but an opportunity to better understand the expectations of our residents and as evidence we are facilitating that communication.

We don't want to see anyone dissatisfied with our services, but we appreciate it when residents get in touch and give us the chance to put things right or explain why we are unable to offer what they are looking for.

The increase in complaints numbers, more stringent regulation, and strict timescales does present challenges we will need to face. We will need to make sure we are well-resourced, both in terms of staff and systems, to meet these challenges.

Our plans for 2024/25:

- Our wider review of our Tenant Involvement Strategy will include looking at ways of involving residents more in our complaints process so that we are providing a service that meets not just the requirements of the Housing Ombudsman, but of the people it is intended to help.
- We will further develop how we use our IT systems to monitor complaints, the
 outcomes, and report on complaints. This includes ensuring senior
 management have visibility of the data so they can identify areas of focus for
 improvement. It will also ensure greater accountability.
- We intend to work with other teams to have specific contacts for complaints investigations and train those people to become experts within their teams on complaints.

- We are looking at what measures we can implement to gain better insight into the themes of complaints so we can identify trends and emerging issues more quickly and efficiently and ensure the complaints data is used and reflected in strategic work e.g. our Asset Management Strategy.
- We have plans for developing a compensation policy for complaints, in conjunction with our residents.
- We are exploring how we can best seek feedback from residents following their complaint so we can measure their satisfaction with both the process and the outcome and use their comments to make improvements.

Closing remarks from the Customer Care & Complaints Manager

Since joining Oxford City Council at the end of February 2024, I have had the opportunity to be part of the many changes that have already taken place. It has been a time of significant change within the housing sector as everyone has had to adapt and review their approaches in order to meet the new regulatory requirements following the implementation Social Housing (Regulation) Act 2023.

Both the new Consumer Standards and the Housing Ombudsman's Code have set out expectations on how we deliver our services which we welcome. Challenging as this has been, with many colleagues having worked hard to prepare for these changes prior to my role starting, it has been an exciting time to join the Council and be part of shaping our plans on how we will meet these requirements and best serve our residents.

Already in 2024/25, we have had several determinations from the Housing Ombudsman. These are an excellent opportunity to get clarity on what is expected from us and get an independent assessment of our services and decision-making. I look forward to sharing the insights from these determinations and the improvements we have made following them in next year's report.

Whilst I would never want anyone to have cause to complain, I appreciate the feedback from all of the residents who have taken the time to contact us and given us the opportunity to try to put things right where there has been a service failure, or explain our decision where there hasn't. We can't always offer people the outcome they want, and we won't always get things right, but we can keep striving to offer the best service we possibly can. We will ensure we keep listening and learning from what our residents are telling us.

Having received positive feedback from the Housing Ombudsman on our actions following a recent determination (post-March 2024, so not included in this report), we want to continue to make improvements so that our Customer Care & Complaints team within Landlord Services provides an excellent service to our residents, complies with all regulatory requirements, collaborates effectively with other teams and partners, and can be held up as an example of best practice within the sector. This will require considerable effort and will take time, but I hope that in next year's Annual Complaint Performance & Service Improvement Report we will be able to demonstrate the progress we have made.

Kat Mayes Customer Care & Complaints Manager



Homelessness Demand and Temporary Accommodation Regular Update – October 2024 – Richard Wood and Kieran Edmunds

Description	Result at EOY 23/24 (March)	Result September 24	Comments	RAG rating
Number of households in temporary accommodation	246	238	The number of households in TA in Oxford has dropped slightly since March, but homelessness and new TA placements remain high so could rise again, so rated amber. Despite a continued high placement rate, this marginal decline has been achieved, as a result of the Council's investment into homelessness prevention and the increase in move on accommodation the Council has delivered.	
Number of households in hotel accommodation	123	105	Linked to the overall reduction in TA numbers, the number in hotels and BnB accommodation has also dropped. As well as the factors mentioned in the previous comment, the drop in hotel placements has been further helped by the start of delivery of new PSL TA accommodation (see mitigation below for explanation). 105 households in hotels is still a high number, so rated amber.	
Number of households with children in notels over 6 weeks	14	3	The Council has a responsibility to avoid hotel placements for 6 weeks and over for households with children. We had 14 families in hotel accommodation in March, whilst trying to source accommodation for those families. Since March a huge effort has led to this number coming down significantly to 3, due to the measures on prevention and move on. Rated amber until we reach zero.	
Current weekly placement rate into temporary accommodation (number of households)	10.18 (Oct 23 to Mar 24)	8.71 (April to Sep)	The placement rate in TA remains at a very high level, despite a small drop since March. It means we place 8-9 households on average a week into TA, when the historic average was more like 3-4. We are investing into prevention services to try to lower it, but fundamentally it's influenced by the housing market and government policy, with major sources of homelessness in the city being PRS evictions linked to high rental inflation, and evictions from a Home Office Asylum hotel.	
Number of accepted homelessness relief cases per quarter (most recent published quarter)	103 (Q4 23/24)	109 (Q1 24/25)	The number of accepted homelessness relief cases remains at historic highs in Oxford, linked to factors explained in the previous comment. Two years ago we typically accepted 30-40 relief cases a quarter, we accepted 109 last quarter, which demonstrates the high	

levels of homelessness in the city. It's putting considerable strain on

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	the Housing Needs Team to be able to support the increased number	
	of households approaching us, but staffing has been increased.	

Area	Description	Progress	Comments	RAG
		statues		rating
P ir o	Delivery of Homelessness Prevention "Invest to Save" to increase teams capacity to focus on prevention	Completed	A fixed term investment has been made into the Councils Housing Options and Early Intervention teams from a central government grant, with 4 new officers recruited, and is supporting a large increase in number of households being supported and an increase in successful outcomes achieved (see points below)	
	Homelessness Prevention 50% or more of all duties taken	Ongoing	A good indicator of health in statutory homelessness services is the balance between how much activity a Council does at the prevention stage v. how much it does in relief (once someone is already homeless). Therefore we target 50% or more of our duties to be Prevention Duties. In Q1 we achieved 55.1%, taking 134 Prevention duties, to 109 Relief duties.	
38	Percentage of homelessness prevention outcomes being positive	Ongoing	We have also seen an increase in the number of prevention cases we close with a successful outcome. In 23/24 we achieved 52.5% having a successful outcome (with the rest either homeless or lost contact). So far in 24/25 we are achieving 62.8%, an increase in positive cases, breaking down to 40 households sustained in current accommodation, and 63 households supported to move to alternative accommodation before becoming homeless.	
Expand TA stock to lower hotel use	Develop and expand a private sector leasing (PSL) scheme	Delivering	We have successful established a PSL scheme targeting an initial 30 units to be used as TA, mostly HMOs. As of September we have secured 30 units, with 18 already in use. We will closely monitor these HMOs as they can be potentially more difficult to manage, and have increased staffing to do so, rated amber as still in early stages.	
	Use more Council stock for the purpose of TA, to prevent households having long stays in hotels.	Delivering	Approximately 15 units have been moved from general needs use to TA over the last 12m, we will continue to move more over if required, in particular to ensure families are not spending long periods in hotel rooms.	
	Launch a new Temporary Accommodation Procurement Framework, to drive up standards and drive down cost.	Delivering	Cabinet approved the creation of the framework in May. The framework has now been established and providers are joining it, ready for us soon to start to successfully appoint providers to begin to deliver.	

	Continue to develop and seek	Ongoing	We continue to look at developing other schemes to expand the	
	approval for other schemes to		council's TA stock. These include talks with Housing Associations	
	expand the Council's TA stock		and developing plans to de-designate accommodation in the Council	
			housing stock awaiting redevelopment to use as TA in the interim	
			following consultation with tenants. We are also considering	
			investment opportunities to purchase units for TA use. Rated amber	
			as complex projects that are in early design stages.	
Increase the	Maximize PRS move on	Ongoing	Service development and investment in our PRS Procurement Team	
move on of			continues to deliver in a very challenging market, with them securing	
homeless			59 new lets in the first 5 months, up from 50 this time last year.	
households	Maximize access to social	Ongoing	In order to meet our statutory obligations, we allocated 40% of all	
	housing		lets to homeless households in the first 5 months of the financial	
out of TA			year (75 properties), compared to 19% (44 properties) for the same	
			period last year, as outlined in the Council's letting plan. We will	
			continue to allocate to this plan as long as demand for TA remains	
			high to ensure we have sufficient move on.	

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