

Title: Consumer Standards Improvement

Lead Officer: Paul Smith

Portfolio Holder: Councillor Jess Melrose, Cabinet Member for Housing

Wards of the District directly affected: All

Approvals required	Date	Name
Portfolio Holder	15.01.2026	Jess Melrose
Finance	15.01.2026	Paul Haslam
Chief Executive	13.01.2026	Chris Elliott
Deputy Chief Executive	15.01.2026	Darren Knight
Strategic Director	15.01.2026	David Elkington
Head of Service(s)	13.01.2026	Kristian Melgaard
Section 151 Officer	15.01.2026	Andrew Rollins
Monitoring Officer	15.01.2026	Graham Leach
Contrary to Policy / Budget framework?	No	
Does this report contain exempt info/Confidential? If so, which paragraph(s)?	No	
Does this report relate to a key decision (referred to in the Cabinet Forward Plan)?	No	
Accessibility Checked?	Yes	

1. Summary

- The Council recognises the serious failings identified in the C3 regulatory judgement from the Regulator of Social Housing (RSH) in September 2024.
- The Consumer Standards Improvement Strategy brought to Cabinet in July 2025 set out lessons learned from the regulatory judgement and the steps needed to address root causes.
- A Consumer Standards Improvement Plan (CSIP) to address each failing has been developed and a new Assurance Framework and Key Performance Indicator (KPI) reporting regime is now in place to strengthen internal governance and assurance.
- The CSIP is broadly on track with several tasks needing revised target dates for completion.
- Progress is monitored through the Assurance Framework brought to Cabinet as, part of the Housing Consumer Standards Improvement Programme Progress item, in July 2025.
- As part of the Framework there is regular reporting through to the council's Senior Leadership Team, the Consumer Standards and Compliance Board, the Housing Scrutiny Committee, and Cabinet. In addition, the project group meets weekly to review progress with the Improvement Plan.
- The Council is committed to achieving full compliance and embedding a culture of safety, transparency, and resident engagement.

2. Links to Strategy Objectives

Corporate Priority 1: Delivering valued, sustainable services

- Ensure Council homes are safe and meet the Decent Homes standard for all our tenants, including improving the energy efficiency of their homes and meeting all new social housing regulatory requirements.
- Consumer Standards Improvement Strategy:
- The Council's housing service improves to a position where the Consumer Standards for social housing are met.
- Any changes that are put in place are done so with assurance and systems to ensure long-term sustainability.
- The ultimate goal is the achievement and maintenance of a C1 grading.

3. Summary of Regulatory Judgement Findings

1. Health & Safety Compliance
 - WDC cannot evidence that it meets all legal health and safety requirements.
 - Over 1,600 overdue fire remedial actions were identified.
 - No assurance that smoke and carbon monoxide alarm requirements are being met.
2. Stock Condition Information
 - Last full stock condition survey was in 2016.
 - New surveys have started but contain inaccuracies.

- WDC lacks a reliable understanding of the condition of its homes.
- 4. Repairs and Maintenance
 - Inadequate systems for managing and overseeing repairs.
 - Low confidence in performance data.
 - No assurance that repairs are effective, efficient, or timely.
- 5. Complaint Handling
 - Complaints are not recorded consistently.
 - Limited evidence of learning from complaints or using them to improve services.
 - No assurance that complaints are addressed fairly, effectively, and promptly.
- 6. All key findings are addressed in the Improvement Plan in **Appendix 1** to the report. The Plan will continue to be expanded and updated throughout the project.

4. Improvement Plan Progress – All Actions (including HQN & Pennington Choices)

Table 1

Status	Count	% of Total	Risk Level
Completed	87	62%	LOW
Underway	44	31%	LOW
Needs Support	0	0%	N/A
Not Started	10	7%	LOW

- There has been a change to the overall number of actions. The total count had been showing as 144 and is now 141. The reason for this change is that there were three actions that were listed in the “Not Started” count that were meant to be subitems rather than specific actions. These have now been placed under the correct action and will be monitored there going forward.
- Overall “On Track” with progress. An additional 6 actions have been completed since our last report. These include the approval of three policies by Cabinet, completing elements associated with the Golden Thread, and reviewing the backlog and improving performance with tenancy update visits, which are now reporting at 96.7%, a significant increase within the data and exceeding current targets. 87 actions have been completed since inception of the Pennington Compliance Plan and then with the addition of the Consumer Standards Action Plan. There are 44 actions underway, including a review and collection of quality, diversity, and inclusion (EDI) data, the continued validation and completion of 100% stock condition surveys, achieving consistency with emergency and routine repairs performance, and ongoing work with policies and strategies.
- There are 10 actions that have not yet started. These are scheduled to start later due to their completion dates and are on target to be completed by the time of inspection within the next two years.

5. Performance Against All Consumer Standards

Table 2

Standard	RAG	Key Issues	Actions Underway
<p>Transparency, Influence and Accountability (including Tenant Satisfaction Measures)</p>	<p>On track</p>	<p>Clear, accessible public information on services, performance and outcomes.</p> <p>Demonstrable, meaningful tenant engagement and evidence tenants influence service design and decisions.</p> <p>Accessible complaints and remedy processes escalation routes and evidence that lessons from complaints are acted on.</p> <p>Clear governance accountability and transparency to the regulator and tenants</p>	<p>Review of current approach to collection of EDI data completed</p> <p>Developing an action plan to know our tenants and be able to use data to review and tailor services.</p> <p>Officer complaints group set up reviewing lessons learnt.</p> <p>New governance structure gaining maturity including more effective reporting.</p> <p>Comprehensive Tenant engagement and Communication action plan developed and supported by Housing Scrutiny Committee and involved tenants.</p>
<p>Safety & Quality</p>	<p>On track</p>	<p>Timely completion and prioritisation of remediation actions from safety checks.</p> <p>Full compliance with all applicable health and safety law and statutory guidance.</p> <p>Homes meet the Decent Homes criteria there is a clear investment/works plan to remedy any shortfalls.</p> <p>Up-to-date, property-level records of stock condition and a credible programme of surveys/inspections.</p>	<p>Validation and completion of 100% stock condition surveys.</p> <p>Complete all remedial and improvement work in relation to known Non-Decent Homes.</p> <p>Update the planned programme: model, programme and costing out the work.</p>

		Damp, Mould and Condensation / Awwab's Law	DMC process to support the requirements of Awaab's law has been configured in the IT system and enhancements to mobile working and surveys is progressing.
Neighbourhood & Community	On track	Measurement and reporting of neighbourhood outcomes. Support and early-intervention activity to sustain tenancies and prevent homelessness or rough sleeping Evidence of proactive neighbourhood management and maintenance of communal/shared spaces, including where responsibility sits with others	ASB policy approval and implementation as well as linking where appropriate to ActiveH.
Tenancy	On track	Tenancy sustainment and tailored support for vulnerable households. Fair allocation and mobility practices	On going work from policies, monitoring impacts and tackling any issues once policies are in place. Improvements made to Tenancy update visits.

6. Current Performance Overview

Table 3

"Big 6" Compliance Performance	Sep-25	Oct-25	Nov-25
Completed Fire Risk Assessments (%)	97.01%	87.31%	87.64%
Overdue Fire Risk Actions (Number)	1298	1295	1254
Completed LGSRs (%)	99.96%	99.91%	99.96%
Completed EICRs (%)	99.27%	99.33%	99.14%
Completed Asbestos Surveys (%)	100%	99.61%	100%
Overdue High Risk Asbestos Actions (Number)	0	0	0
Communal Legionella Risk Assessments (%)	93.33%	100.00%	100%
Lifts with current LOLER Assessment (%)	100%	100%	100%

Detailed performance information and exception reporting for landlord statutory compliance, including gas, electrical, fire, water, asbestos, lifts, DMC, stock condition, and responsive repairs is set out in **Appendix 2** to this report. The exceptions to this report are listed below.

- Gas Safety: There are two properties showing as non-compliant. These are not a risk and more detail is provided in **Appendix 2**.
- Electrical Safety: We are continuing to attempt to gain access to these properties. We are working with Housing Officers and the Housing Enforcement team to implement our No Access policy.
- Fire Safety: A review of outstanding actions from existing Fire Risk Assessments that are due for renewal has been completed by the Fire Safety Lead and the Building Safety Lead. Further detail is provided in **Appendix 2**.
- DMC: There is a specific update regarding the DMC stage framework in **Appendix 2**.

Table 4

Assets & Repairs Performance	Sep-25	Oct-25	Nov-25
Non-Emergency repair requests completed within target time (%)	83.86%	81.65%	86.4%
Emergency repair requests completed within target time (%)	97.40%	93.84%	83.4%
Outstanding repairs requests that are overdue (Number)	1012	1063	1165
Homes that are non-decent (%)	3.70%	3.30%	2.95%
Homes with a stock condition survey completed in the last 5 years (%)	73.9%	75.0%	76.8%
Resolved damp, mould and condensation cases handled in time (%)			

- Repairs: Looking at the emergency repairs for November, this is an anomaly and there has been follow up with the contractors to understand this. There is an action in place to constantly be achieving a percentage of 98% with emergency repairs by the end of Q4 2025. With the WIP, there remains an action plan in place that is monitored regularly and worked upon daily with the contractor. There has also been the implementation of the new suite of works order priority codes to which will ensure works are raised within a wider range of target completion. We expect to see changes over the coming months, and we are still reviewing options for better integration and development of the contractor web-portal.
- Decent Homes: The SCS is continuing, and we expect to be at least 90% complete by June 2026. Currently, after validation, we are showing 171 properties that do not meet Decent Home Standards. These have been placed into a programme which we are reviewing and will reprofile for a report to governance in February.

7. Complaints

Table 5

Complaints Performance	Sep-25	Oct-25	Nov 25
Number of stage 1 complaints received (TSM applicable)	35	32	29
Percentage of stage 1 complaints fully responded to in time (Handling code)	100%	88%	93%
Number of stage 2 complaints received (TSM applicable)	4	7	12
Percentage of stage 2 complaints fully responded to in time (Handling code)	100%	86%	100%

- Stage 1 performance has recovered from the dip for October which was due to two complaints being received outside the acknowledgement window and one complaint acknowledged a day late. The admin process has been reviewed and measures put in place to reduce a repetition.

8. Evidence & Audit Trail

- All compliance certificates, inspection reports, and meeting minutes uploaded to a SharePoint folder with version control.
- Random sample checks by Internal Audit confirm evidence completeness.

9. Tenant Voice & Engagement

- A new action plan for the Resident Engagement Strategy was noted and endorsed by Housing Scrutiny Committee at the meeting on 2 December 2025. This action plan will be reported to all levels of Governance in specific reports or briefing notes on a quarterly basis.

10. Independent Assurance & External Scrutiny

- Morgan Lambert conducted the first of the contracted compliance audits for gas and heating during October 2025. Details are being compiled and once the report is finalised the findings will be shared with Housing Scrutiny Committee in March 2026.
- The Fire audit is scheduled for Q4 2025/26 although the exact timing is yet to be agreed as the first scoping meeting needs to take place.
- The other four audits from the 'big 6' (electric, asbestos, water and lifts) are now due to be undertaken in 2026/27, with the schedule to be agreed as part of next year's audit planning.
- Monthly contract meetings with Pennington Choices continue, to discuss progress with FRA surveys.

11. Forward Look / Pipeline

- The mid-point review from HQN will be conducted in February and March, with reports will presented to all levels of governance in April.
- The end-point review by Pennington Choices will be scheduled for Q1 2026.

12. Resource & Capacity Overview

- As part of minimising risk to service delivery ahead of budget setting for 2026-27, four fixed term roles have been approved to be made permanent, and one fixed term contract has been extended.

13. Risks & Escalations

Table 6

Risk	Impact	Mitigation
Contractor underperformance	Delays to compliance	Contract management escalation; re-procurement where necessary.
No access for EICR	Non-compliance risk	Legal access process, targeted tenant engagement.
Data quality gaps in asset systems	Weak assurance	Validation surveys; data cleansing programme.

- Safety and Compliance continue to feature highly on the Housing Risk Register and the Corporate Significant Risk Register. There have been no changes since last month. The next review of the risk register, **Appendix 3**, will take place in early February and then brought through to the levels of Governance before the end of March.
- Risks continue to be managed through the Assurance Framework.
- There are no issues or risks escalated from Officer Groups (Fire Safety and Building Safety).

14. Cross-Cutting Issues & Implications

- Finance: Improvement plan actions funded from existing HRA budgets.

15. Regulator of Social Housing (RSH) proposed amendments to consumer standards

- On 9 December 2025 the Regulator of Social Housing (RSH) launched a 12-week consultation on proposed amendments to its consumer regulatory framework. The document seeks views on updating the Transparency, Influence and Accountability (TI&A) Standard, changes to the Consumer Standards Code of Practice, and the introduction of a new Tenant Satisfaction Measure (TSM) on electrical safety checks. The consultation closes on 3 March 2026. The proposals aim to align RSH's standards with government directions issued under the Social Housing (Regulation) Act 2023 and to improve transparency, tenant access to information, and service quality for social housing tenants. **Appendix 4** gives an overview of the consultation. Members are invited to provide feedback on the changes before the consultation close which can then be incorporated with any other feedback from the council.

16. Housemark Training Session - What Good Looks Like

- Housemark provided a training session on January 8, 2026 to Members and Officers. This was to look at comparative performance data within our peer group and provide an understanding as to what Good Looks Like. The training session was insightful and provided an opportunity for Members to ask pertinent questions regarding the current challenges facing Local Authorities. The Slides are provided for review in **Appendix 5**.

Background papers:

None

Supporting Documents:

Appendix 1: Improvement Plan Tracker

Appendix 2: Landlord Stock Quality and Safety Pro-forma

Appendix 3: CSIP Risk Register

Appendix 4: RSH consultation proposed amendments to Consumer Standards

Appendix 5: What Good Looks Like, Housemark Training Session Slides