



AGENDA ITEM: 12

CABINET:
19th January 2010

**EXECUTIVE OVERVIEW &
SCRUTINY COMMITTEE:**
4th February 2010

Report of: Executive Manager Housing and Property Maintenance Services

Relevant Portfolio Holder: Councillor Mrs.V. Hopley

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**SUBJECT: A NEW REGULATORY FRAMEWORK FOR SOCIAL HOUSING
IN ENGLAND – A STATUTORY CONSULTATION**

RVL/EH2909cabeo&s
8th January 2010
Borough-wide interest

1.0 INTRODUCTION

1.1 This report is to consider the Consultation Paper issued by the Tenant Services Authority (TSA) on a new regulatory framework for Social Housing in England and to decide how best to respond to this.

2.0 RECOMMENDATIONS TO CABINET

2.1 That the Executive Manager Housing and Property Maintenance Services, in consultation with the Portfolio Holder for Housing, respond to TSA after hearing the views and comments of Cabinet, Executive Overview and Scrutiny Committee, and the Tenant and Resident Forum.

2.2 That call in is not appropriate for this item as the report is being submitted to the next meeting of the Executive Overview and Scrutiny Committee on 4th February 2010.

3.0 RECOMMENDATION TO EXECUTIVE OVERVIEW AND SCRUTINY COMMITTEE

3.1 That the Committee consider the report and agree comments to be taken into account by the Executive Manager Housing and Property Maintenance Services, when responding to the Consultation Paper issued by the TSA.

4.0 BACKGROUND AND PRINCIPLES TO SHAPE REGULATION

- 4.1 The Government has established the TSA to be the domain regulator for social housing under the Housing and Regeneration Act 2008.
- 4.2 The TSA will commence its regulation for Local Authorities and Arms Length Management Organisations (ALMOs) from 1 April 2010.
- 4.3 The TSA have already carried out consultation in a discussion document. This formed the basis of a workshop for Members, Tenants and Officers.
- 4.4 Following the workshop the Council's comments were sent to the TSA (Appendix 1)
- 4.5 The TSA propose to use 10 principles to shape regulation, these are:
 - 4.5.1 National Standards will be established based on clear criteria.
 - 4.5.2 National Standard will be clear, succinct, based on outcome and avoid prescribed detailed processes.
 - 4.5.3 The National Standard Framework will require providers to agree local standards with their tenants for the areas of service that are relevant to them locally.
 - 4.5.4 Every tenant matters. We expect providers to understand and respond to the particular needs of their tenants and to demonstrate how they have taken into account the needs of tenants across the six diversity groups. The diversity groups consist of the following:
 - (a) ethnicity
 - (b) disability
 - (c) sexuality
 - (d) age
 - (e) gender
 - (f) religion/belief
 - 4.5.5 Promote transparency in reporting of performance by providers for tenants and Local Authorities (in their strategic role) in areas they operate.
 - 4.5.6 Good governance is a universal principle and is essential to the quality of service delivery, financial robustness and value for money.
 - 4.5.7 TSA wants to promote effective forms of independent validation, audit and benchmarking of performance to encourage providers to continually improve and free the best from unnecessary red tape.
 - 4.5.8 For the national service delivery standards, the TSA will focus their resources in 2010/11 on identifying and addressing the worse performing providers, where tenants are being let down by their providers performance.

- 4.5.9 The standards framework must support the principle of sector-led improvement. Where problems are identified the provider will usually be offered an opportunity for speedy self-improvement.
- 4.5.10 Registration criteria should encourage new entry into the social housing sector consistent with TSA objectives in the Housing and Regeneration Act 2008.

5.0 CURRENT POSITION ON NATIONAL AND LOCAL STANDARDS

5.1 Following the discussion document the TSA advise that there was broad reaffirmation by stakeholders of the proposed National Standards. The National Standards have been rationalised and are set out below:

5.1.1 Figure 1 – Proposals for national standards

- A. Tenant Involvement and Empowerment
 - Involvement and empowerment
 - Customer service and choice
 - Equalities and diversity
 - Tenants with additional support needs
 - Complaints

- B. Home
 - Repairs and maintenance
 - Quality of accommodation

- C. Tenancy
 - Allocations
 - Rent
 - Tenure

- D. Neighbourhood and Community
 - Neighbourhood management
 - Local area co-operation
 - Anti-social behaviour

- E. Value for Money
 - Value for money

- F. Governance and Financial Viability*
 - Governance
 - Financial viability

* This standard does not apply to Local Authorities.

5.1.2 Landlords will be required to publish their plans for how they will develop local standards as soon as possible after 1/4/10 and by no later than 1/10/10. Local Standards will need to be in place 1/4/11.

5.1.3 The definition of “local” could mean a whole Local Authority area or it could be drilled down to neighbourhoods with different priorities and needs.

5.2 The TSA can issue Codes of Practice but they do not propose do so at the moment.

6.0 REGULATION OF LOCAL AUTHORITY PROVIDERS

6.1 There are some differences in the sector between Registered Social Landlords (RSLs) and Local Authority providers. Whilst the TSA will regulate the financial affairs and governance arrangements of RSLs, the current arrangements of the Audit Commission overseeing the financial and governance issues of Local Authorities will continue.

6.2 The TSA are in discussions with the Local Government Association (LGA) to establish a Local Performance Framework. This is expected to include:

- (a) An annual report for tenants which will contain a self assessment against national and local standards.
- (b) Accreditation Schemes and external validation where appropriate.
- (c) National Indicator Set Data.
- (d) Tenant feedback and resident petitions
- (e) Cases reported to the Local Government Ombudsman where a determination is made.
- (f) Outcomes reported by the Audit Commission's CAA process.

6.3 The TSA will require information but have agreed with Government that this will be information already provided by Local Authorities for public reporting and internal management purposes.

7.0 PROPOSED TENANT INVOLVEMENT AND EMPOWERMENT STANDARD

7.1 This Standard covers customer services and choice, tenant involvement and empowerment and complaints. This is complemented by cross cutting themes of equality and diversity and tenants with additional support needs.

7.2 The required outcomes are:

7.2.1 Customer service and choice

Registered providers must design and deliver housing services that tenants can access easily. Tenants must be offered choices over the services they receive, and be treated with fairness and respect. In relation to all the standards, registered providers must consider equality issues and the diversity of their tenants, including tenants with additional support needs.

Registered providers must understand their tenants' needs and use this information to:

- design and deliver housing services
- communicate with tenants

7.2.2 Involvement and empowerment

Registered providers will offer all tenants opportunities to be involved in the management of their housing. This must include opportunities to:

- influence housing related policies and how housing related services are delivered
- be involved in scrutinising performance in delivering housing-related services registered providers must offer tenants support so they are more able to be effectively engaged, involved and empowered.

7.2.3 Responding to complaints

Registered providers must have a clear and accessible policy. They must deal with tenants' complaints and any other feedback promptly, politely and fairly. The policy must include how they use complaints and other feedback to:

- change how they do things
- improve services

7.3 Specific requirements

7.3.1 Customer service and choice

7.3.1.1 Registered providers will be able to show they have arrangements for understanding their tenants, their views and needs so that in all the standards, they can use this information to:

- improve services
- offer choices in the services provided

7.3.1.2 For all the standards, registered providers must consider equality issues and the diversity of their tenants, including tenants with additional support needs and incorporate choices that are designed to meet the diverse needs of their tenants.

7.3.1.3 Registered providers will provide tenants with accessible, comprehensive and timely information about:

- how tenants can access services
- the standards of housing services their tenants can expect
- how they are performing against those standards
- the service choices available to tenants
- any additional costs that are relevant to specific choices
- how tenants can communicate with them

7.3.2 Involvement and empowerment

7.3.2.1 Registered providers, having consulted their tenants, must have arrangements in place that support and enable tenants to be involved and empowered. Tenants must have the opportunity to:

- be involved in the management of their homes (including, for example, in relation to the repairs programme and choice of main contractors)
- influence their registered provider's strategic priorities
- measure and scrutinise how effective their registered provider's involvement and empowerment policy is

7.3.2.2 Registered providers must say how they will provide support to build tenants' capacity to be effectively engaged, involved and empowered.

7.3.2.3 Arrangements for involvement and empowerment must be clearly published and accessible for tenants.

7.3.2.4 Following consultation with their tenants, registered providers will establish by no later than 1 April 2011 local standards in those service areas where the TSA has indicated that its national standards should be tailored with local standards where tenants want them. Local standards should include commitments on:

- local standards for performance
- how performance will be monitored and reported to tenants
- how tenants can be involved in scrutinising performance
- what happens if local standards are not met
- arrangements for reviewing the local standards on an annual basis

7.3.2.5 Registered providers will consult their tenants about how many tenant members there should be on their governing bodies or service delivery committees. Registered providers will do this at least once every three years.

7.3.2.6 Registered providers will offer tenants a range of opportunities to scrutinise their performance. This applies to all standards.

7.3.2.7 When registered providers are required by law to consult tenants about changes to their constitution (for example, where there will be a change of registered provider), they should clearly and objectively set out the options, and the costs and benefits of the options.

7.3.2.8 Where registered providers intend to make a significant change in the arrangements for the management of their stock, they must consult their tenants.

7.3.2.9 Where registered providers have consulted tenants about the standards, they should feed back to tenants about how they have taken their views into account.

7.3.3 Responding to complaints

7.3.3.1 Registered providers will have an approach to complaints that is clear, simple and accessible to tenants and potential tenants. The approach should include:

- a range of ways for tenants to express a complaint
- details of what to do if they are unhappy with the outcome of a complaint

7.3.3.2 Registered providers will develop, agree and monitor service standards for complaints with tenants. Registered providers will make sure that complaints and any other feedback are managed and resolved promptly, politely and fairly.

7.3.3.3 Each year registered providers will publish information about:

- the number of complaints received
- the nature of the complaints
- the business area the complaints relate to
- the outcome of the complaints
- how they have changed the way they do things to improve services as a result of feedback

8.0 PROPOSALS FOR THE HOME STANDARD

8.1 The required outcomes are:

8.1.1 Quality of accommodation

Registered providers must ensure that all homes are warm, weatherproof and have modern facilities.

8.1.2 Repairs and maintenance

Registered providers must provide a cost-effective repairs and maintenance service that responds to the needs of, and offers choices to, tenants. They must meet all applicable statutory requirements that provide for the health and safety of tenants in their homes.

8.2 Specific requirements

8.2.1 Quality of accommodation

8.2.1.1 Registered providers must ensure tenants' homes either:

- meet the Decent Homes Standard set out in Section 5 of the Government's Decent Homes guidance*,

or

- meet the standards of design and quality that applied when the home was first built, and were required as a condition of publicly funded financial assistance**, if these standards are higher than the Decent Homes Standard

8.2.1.2 Registered providers must meet the standard in 8.2.1.1 by 31 December 2010. They must continue to maintain their homes to this standard. The TSA may agree an extension to this date with the registered provider where it is reasonable.

8.2.1.3 Registered providers must ensure their tenants have the opportunity to agree a

local standard, as set out in 7.3.2.4 of the Tenant Involvement and Empowerment standard. The local standard should be higher than the standard set out in 8.2.1.1. In developing local standards, registered providers must:

- have regard to Section 6 of the Government's Decent Homes guidance
- demonstrate how they have ensured that tenants' views have been taken into account

* 'Decent Homes guidance' means A Decent Home: Definition and Guidance for Implementation, published by the Department for Communities and Local Government in June 2006, and any guidance issued by the Department or its successors, in relation to that document¹⁴.

** 'Financial assistance' is defined in Section 19 (3) of the Housing and Regeneration Act, 2008. For the purpose of this standard it includes financial assistance provided by the Homes and Communities Agency's predecessor bodies.

8.2.2 Repairs and maintenance

8.2.2.1 Registered providers must have a repairs and maintenance service that:

- is cost effective
- has the objective of completing repairs and improvements 'right first time'
- has published standards that have been agreed with tenants for completing repairs and improvements
- offers tenants choice (for example about appointment times for carrying out repairs)

8.2.2.2 Registered providers must ensure a prudent, planned approach to repairs and maintenance. It should demonstrate an appropriate balance of planned and responsive repairs, and value for money. The approach should include:

- responsive repairs
- planned and capital work
- work to empty properties
- adaptations
- cyclical works
- communal areas as well as individual homes

8.2.2.3 Registered providers must comply with all applicable legislation and regulation that provide for the health and safety of the occupants of their homes.

8.2.2.4 Registered providers must ensure their tenants have the opportunity to agree a local standard, as set out in 7.3.2.4 of the Tenant Involvement and Empowerment standard.

8.2.2.5 Registered providers must provide tenants with clear information about:

- each other's responsibilities
- the progress of works

8.2.2.6 Registered providers must co-operate with relevant organisations to provide an adaptations service that meets tenants' needs.

9.0 PROPOSALS FOR A TENANCY STANDARD

9.1 The required outcomes are:

9.1.1 Allocations

Registered providers must let their homes in a fair, transparent and efficient way. They must take into account the housing needs and aspirations of tenants and potential tenants. They should demonstrate how their allocations processes:

- make the best use of available housing
- contribute to local authorities' strategic housing function and sustainable communities

There should be clear decision making and appeals processes.

9.1.2 Rents

Registered providers will charge rents in accordance with the objectives and framework set out in the Government's direction to the TSA of November 2009.

9.1.3 Tenure

Registered providers must offer and issue the most secure form of tenure compatible with:

- the purpose of the housing
- the sustainability of the community

They must meet all applicable statutory and legal requirements in relation to the form and use of tenancy agreements.

9.2 Specific requirements

9.2.1 Allocations

9.2.1.1 Registered providers will co-operate with local authorities' strategic housing function, and their duties to meet identified local housing needs. This includes assistance with local authorities' homelessness duties, and through meeting obligations in nominations agreements. Where in exceptional circumstances registered providers choose not to participate in choice-based lettings schemes in areas where they own homes, they justify their reasons for doing so publicly.

9.2.1.2 Registered providers will develop and deliver services to address under

occupation and overcrowding in their homes, within the resources available to them. These services will meet the needs of their tenants, and will offer choices to them.

9.2.1.3 Registered providers will provide tenants wishing to move with access to clear and relevant advice about their housing options. They will participate in mobility schemes and mutual exchange schemes where these are available.

9.2.1.4 Registered providers will publish their allocations policies and outcomes, how this has made best use of available housing and contributed to sustainable communities. The published policies should include (where it applies) their participation in:

- common housing registers
- common allocations policies
- local lettings policies

Registered providers will clearly set out, and be able to give reasons for, the criteria they use for excluding actual and potential tenants from consideration for allocations, mobility or mutual exchange schemes.

9.2.1.5 Registered providers will develop and deliver allocations processes in a way which supports their effective use by the full range of actual and potential tenants, including those with support needs, those who do not speak English as a first language and others who have difficulties with written English.

9.2.1.6 Registered providers will work to make sure that the specific needs and aspirations of tenants and potential tenants with diverse needs are reflected in the choices available to them. This applies particularly to the development of local lettings policies.

9.2.1.7 Registered providers must minimise the time that properties are empty between each letting. When doing this, they must take into account the circumstances of the tenants who have been offered the properties.

9.2.1.8 Registered providers must record all lettings and sales in the Continuous Recording of Lettings system.

9.2.2 Rents

9.2.2.1 Registered providers will ensure they meet the following requirements which derive from the Government's direction to the TSA of November 2009 and published within Directions to the Tenant Services Authority – summary of responses and Government response, November 2009, CLG.

9.2.2.2 Subject to paragraph 2.3, registered providers will set rents with a view to achieving the following as far as possible:

9.2.2.2.1 Rents conform with the pattern produced by the rent formula set out in Rent Influencing Regime guidance* ('target rents') with a five per cent tolerance in individual rents (ten per cent for supported and sheltered housing) ('rent flexibility

level') but subject to the maximum rent levels specified in that guidance ('rent caps').

9.2.2.2.2 Weekly rent for accommodation increases each year by an amount which is no more than RPI** + 0.5% + £2 until it reaches the upper limit of the rent flexibility level or the rent cap, whichever is lower.

9.2.2.2.3 Weekly rent for accommodation which has reached or is above the upper limit of the rent flexibility increases each year by an amount which is no more than the increase to the target rents.

9.2.2.2.4 Rent caps increase annually by RPI + one per cent.

9.2.2.2.5 Target rents increase annually by RPI + 0.5%.

9.2.2.3 Where the application of the rents standard would cause registered providers to be unable to meet other standards, particularly in respect of financial viability including the risk that a reduction in overall rental income causes them to risk failing to meet existing commitments such as banking or other lending covenants, then the TSA may allow extensions to the period over which the requirements of the rent standard are met.

9.2.2.4 Registered providers must provide clear information to tenants that explains how their rent and any service charge is set, and how it is changed, including reference to the RPI benchmark to which annual changes to rents should be linked (except where rents are controlled under different legislation).

* 'Rent Influencing Regime guidance' means the Rent Influencing Regime Guidance published by the Housing Corporation¹⁵ in October 2001, and any guidance issued by the Housing Corporation or TSA, or its successors, in relation to that document.

** 'RPI' means the general index of retail prices (for all items) published by the Office of National Statistics or, if that index is not published for any month, any substituted index or index figures published by that Office.

9.2.3 Tenure

9.2.3.1 Registered providers must publish clear and accessible policies which outline their approach to tenancy management. They must develop and provide services that will support tenants to maintain their tenancy and prevent unnecessary evictions. The approach must set out how registered providers will make sure that the home continues to be occupied by the tenant they let the home to.

9.2.3.2 Registered providers must provide tenants with accessible, comprehensive and timely information about their responsibilities and tenants' responsibilities.

10.0 PROPOSALS FOR NEIGHBOURHOOD AND COMMUNITY STANDARDS

10.1 The required outcomes are:

10.1.1 Neighbourhood management

Registered providers will keep the common areas associated with the homes that they own clean and safe. To achieve this, they will work in partnership with:

- their tenants
- other providers and public bodies, where this is the most effective way of achieving this standard

10.1.2 Local area co-operation

Registered providers will co-operate with relevant partners to help promote social, environmental and economic well being in the areas where their properties are.

10.1.3 Anti-social behaviour

Registered providers must work in partnership with other public agencies to prevent and tackle anti-social behaviour in the neighbourhoods where they own homes.

10.2 Specific requirements

10.2.1 Neighbourhood management

10.2.1.1 Registered providers will consult with tenants in developing their policy for maintaining and improving the neighbourhoods associated with their homes. This applies where the registered provider has a responsibility for the condition of that neighbourhood. The policy must include any communal areas associated with the registered provider's homes. The registered provider must publish this policy.

10.2.1.2 Registered providers must ensure their tenants have the opportunity to agree a local standard, as set out in 7.3.2.4 of the Tenant Involvement and Empowerment standard.

10.2.2 Local area co-operation

10.2.2.1 Registered providers, having taken account of their presence and impact within the areas where they have properties, will:

- identify and publish the roles they are able to play within the areas where they have properties
- co-operate with local strategic partnerships and local strategic housing authorities where they are able to assist them in achieving their objectives

10.2.3 Anti-social behaviour

10.2.3.1 Registered providers will develop and deliver services which are effective in achieving the core commitments of the Respect Standard for Housing Management 17.

10.2.3.2 Registered providers will publish a policy on how they work with relevant partners to tackle anti-social behaviour in areas where they own properties.

10.2.3.3 Registered providers must ensure their tenants have the opportunity to agree a local standard, as set out in 7.3.2.4 of the Tenant Involvement and Empowerment standard.

11.0 PROPOSALS FOR A VALUE FOR MONEY STANDARD

11.1 The required outcomes are:

11.1.1 Value for money

In meeting all national standards and their local standards, registered providers have a comprehensive approach to managing their resources to provide cost-effective, efficient, quality services and homes to meet tenants' and potential tenants' needs.

11.2 Specific requirements

11.2.1 Value for money

11.2.1.1 Registered providers, publish as part of their communications with their tenants, information on at least an annual basis that demonstrates:

- how they have allocated and prioritised expenditure on different areas of housing services covered by the national standards and their local standards and other priorities such as investment in the supply of new social housing
- how they have ensured that it has secured value for money in that expenditure, how they have tested this, and the benefits that tenants can expect their expectations for future value for money improvements and how they have taken into account in these expectations improvements arising from asset management, income management, and procurement policies.

11.2.1.2 Registered providers have arrangements for tenants to influence the services delivered and the cost of those services that result in service charges to tenants. Registered providers must ensure their tenants have the opportunity to agree a local standard (in line with the requirements of 7.3.2.4 of the Tenant Involvement and Empowerment standard).

11.2.1.3 Registered providers' governing bodies scrutinise the performance of the registered provider at least annually against this standard.

12.0 PROPOSALS FOR A GOVERNANCE AND FINANCIAL VIABILITY STANDARD

12.1 The required outcomes are:

12.1.1 **Governance**

Registered providers have effective governance arrangements that ensure that they have structures, systems and processes to deliver their aims, objectives and intended outcomes for tenants and potential tenants in an effective, transparent and accountable manner. Governance arrangements ensure they:

- adhere to all relevant legislation
- comply with their governing documents and all regulatory requirements
- are accountable to tenants, the TSA and relevant stakeholders
- safeguard tax payers' interests and the reputation of the sector

12.1.2 **Financial viability**

Registered providers must manage their resources effectively to ensure their viability is maintained.

12.2 **Specific requirements**

12.2.1 **Governance**

12.2.1.1 Registered providers adopt and comply with an appropriate code of governance. They will give the reasons for their choice and explain areas of non-compliance with their chosen code.

12.2.1.2 Registered providers must establish and maintain clear roles, responsibilities and accountabilities for their board, chair and chief executive. At least once a year, they must assess how effective these arrangements are in meeting the required outcomes above.

12.2.1.3 Registered providers submit an annual return, on an accurate and timely basis in a form determined by the TSA. This is currently the Regulatory and Statistical Return (and its successor the National Register of Social Housing).

12.2.1.4 Where a registered provider is within a wider group structure that is not regulated by the TSA, it will ensure with its parent that nothing in their relationship shall hinder the subsidiary's ability to meet all the national standards, and the TSA's effective regulation of performance against these standards.

12.2.2 **Financial viability**

12.2.2.1 Registered providers ensure that:

- effective controls and procedures are in place to ensure security of assets and the proper use of public funds

- effective systems are in place to monitor and accurately report delivery of their plans
- the risks to delivery of financial plans are identified and effectively managed

12.2.2.2 Registered providers will ensure that they have a robust and prudent business planning and control framework. Through this framework they will ensure:

- there is access to sufficient liquidity at all times
- financial forecasts are based on appropriate and reasonable assumptions
- planning sufficiently considers the financial implications of risks to the delivery of plans
- they monitor, report on and comply with their funders' financial covenants

12.2.2.3 Registered providers will provide to the TSA:

- accurate and timely statutory and regulatory financial returns
- an annual report on any losses from fraudulent activity

13.0 EXPECTED OUTCOMES

13.1 The TSA wish to improve service delivery to tenants and have a “tool kit” to achieve this which includes:

- Promoting sector-led improvement and best practice
- Monitoring performance
- Co-regulation
- Assessing compliance
- Issuing of Annual Report – effective 1/7/11
- Wider information requirements and submissions
- Inspections
- Complaints
- Risk-based approach and regulatory activity
- Publishing regulatory assessments
- Use of formal regulatory enforcement powers

14.0 MISCELLANEOUS

14.1 The Consultation Paper which runs to 140 pages also seeks views on the registration and deregistration criteria.

14.2 There is no discussion about fees other than to say that there will be no charges until April 2011.

15.0 PRINCIPLES FOR PROPOSED RESPONSE

15.1 The TSA are clearly in a difficult position because of the different funding regimes for RSLs, ALMOs and Local Authorities.

- 15.2 This being the case there is little alternative but to specify the areas that should be covered e.g. the National Standards and to require providers to prioritise and shape services to meet local needs within the funding available.
- 15.3 Whilst I have some concerns that this could become a bureaucratic process overall I feel that under the circumstances this will create a dialogue on service delivery which will improve services and or give better value for money.
- 15.4 Dependent on the HRA settlement for 2010/11 it may be prudent to allow resources to support the work that will be necessary to ensure all local standards are in place by 1/4/11.
- 15.5 Fortunately, the work necessary to successfully install the replacement Housing Management Information Computer System will be of assistance and we have already engaged with Tenants on ways to improve outcomes for our customers.

16.0 PROPOSALS

- 16.1 Generally, the approach taken by the TSA is appropriate and should be supported, subject to views of Tenants and Members, which will be canvassed as part of this report.
- 16.2 I have some reservations about the costs that could be levied by the TSA and am disappointed that these do not form part of this Consultation. I propose to ask that fees be consulted upon at the appropriate time.

17.0 SUSTAINABILITY IMPLICATIONS/COMMUNITY STRATEGY

- 17.1 There are no sustainability implications arising from this Consultation Paper.
- 17.2 The aims of the TSA in trying to improve services for Tenants is in accordance with the Community Strategy.

18.0 FINANCIAL AND RESOURCE IMPLICATIONS

- 18.1 There are no direct financial issues arising from the Consultation for 2010/11 but please note the comments in 16.2 above because there will be changes for this service from 2011/12 onwards which , at this stage, are not specified.
- 18.2 Either new or refocused resources will need to be used to ensure we are compliant with agreeing local standards by 1/4/11.
- 18.3 I will allocate a small budget next year to help support the work that is necessary within the timescale specified.

19.0 RISK ASSESSMENT

- 19.1 The biggest risk of delivering the requirements of the TSA will be the time demands and capability of tenants to participate.

19.2 This is an area that needs to be discussed with Tenants to see how we can encourage more Tenants to share the burden of this activity.

20.0 CONCLUSIONS

20.1 Overall the TSA Consultation Paper should be supported and we should use this as a vehicle to have a dialogue with customers and to find ways to improve involvement and service delivery.

Background Documents

A new regulatory framework for social housing in England – a statutory consultation issued by TSA.

Equality Impact Assessment

There is no evidence from an initial assessment of an adverse impact on equality in relation to the equality target groups.

Appendices

Appendix 1 – Letter dated 4th September to TSA