

Cheltenham Borough Council

Cabinet Housing Committee – 15 January 2025

Consumer Standards Improvement Programme

Accountable member:

Cllr Flo Clucas, Cabinet Member for Housing and Customer Services

Accountable officer:

Claire Hughes, Director of Governance and Customer Services

Ward(s) affected:

n/a

Key Decision: No

Executive summary:

The purpose of this report is to present the Consumer Standards Improvement Programme to Cabinet Housing Committee, to provide an update on progress against the plan, and to highlight key achievements to date and emerging risks to the delivery of the programme.

Solid foundations are in place to ensure the successful delivery of the programme. The programme initiation documentation has been written, consulted on and signed off by the programme board which sets out the vision and outcomes for this programme, as well as how the programme will be delivered.

Consultative work has been completed through detailed scoping sessions with key stakeholders across the organisation to develop the original improvement plan into a wider Improvement Programme made up of 19 interrelated projects, which are detailed in the appendices. These scoping sessions have been instrumental in identifying outcomes, benefits and interdependencies across the programme.

The programme's risk management framework has been aligned with the CBC risk management policy and the identification and mitigation of programme risks and issues is developing well within the team and governance structure. Recommendations from the Penningtons external audit have been cross referenced into the programme and can be tracked alongside the delivery of the plan.

The programme team have adopted a best practice prioritisation approach to determine the overall schedule which will ensure that projects and project outcomes are sequenced and resourced effectively to deliver maximum impact as quickly as possible. The current scheduling of the plan reflects the mix of resource and their capacity across the organisation, which enables some projects to run concurrently.

Delays will mainly arise if supporting resources such as system, data, reporting, communication or mapping resource is overloaded, or if operational housing resources are diverted away from programme delivery tasks.

The programme team have kicked off the development of a communications plan with support from the communications team, to ensure that all stakeholders are communicated with effectively and efficiently through the delivery of the programme, sharing successes and challenges as they arise.

The programme plan detailing all 19 projects and their start and end dates can be found in appendix iii.

Appendix iv shows overall progress against the plan for the projects that are currently in delivery, detailing an overall RAG progress and % complete.

Recommendations:

That the Housing Cabinet Committee

1. note the programme plan, associated risks and mitigations
2. note the progress to date in the delivery of the programme

Implications

Financial, Property and Asset implications

Not applicable to this overarching report, however financial, property and asset implications will be considered on individual projects as required

Signed off by: Gemma Bell, Director of Finance and Assets, gemma.bell@cheltenham.gov.uk

1.1 Legal implications

1.2 The Regulator of Social Housing (RSH) has since 1 April 2024 set out new Consumer Standards that the council are legally required to meet. Furthermore, The Social Housing Regulation Act (2023) has expanded the regulator's powers. Failure to meet the standards could result in action being taken against the council. The RSH will be undertaking inspections of social housing providers to assess their compliance and provide a rating. Failure to comply also requires the council to self-refer to the RSH.

1.3 Depending on the risks and the mitigations in place, the regulator may intervene and require improvements to ensure compliance.

1.4 This report and the Consumer Standards programme, together with the updates in respect of the plan in the appendices will enable the Committee to assess the actions being taken and progress made in order to achieve compliance with the Consumer Standards.

1.5 As this report is for noting, there are no additional direct legal implications arising from this report.

1.6 **Signed off by:** Lisa Madigan, Lawyer, One Legal, lisa.madigan@onelegal.org.uk

2 Environmental and climate change implications

2.1 The climate impact assessment tool will be utilised when considering individual projects detailed within the Programme Plan. Through the use of this tool, efforts will be made to mitigate any negative environmental and social implication identified. In some cases, projects may lead to associated positive climate implications such as works in building services undertaken through enhancing stock condition for resident wellbeing and healthier homes improving energy efficiency.

Signed off by: Maizy McCann, Climate Officer, Maizy.McCann@cheltenham.gov.uk

3 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Increasing the number of affordable homes through our £180m housing investment plan
- Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity
- Being a more modern, efficient and financially sustainable council

3.1 Equality, Diversity and Inclusion Implications

Not applicable to this overarching report, however equality impact screening assessments will be completed on individual projects as required.

3.2 Performance management – monitoring and review

Performance of this programme will be monitored and reviewed by the Consumer Standards Programme Board on a monthly basis, and by Cabinet Housing Committee on a bi-monthly basis.

4 Background

2.1 The regulator of Social Housing (RSH) who is responsible for regulating registered housing providers of social housing set out new standards for social landlords on 29th February 2024 and came into effect from 1st April 2024. These new standards have been designed to protect tenants and improve the service they receive. The four consumer standards are: The Safety and Quality Standard which requires landlords to provide safe and good-quality homes for their tenants, along with good-quality landlord services. The Transparency, Influence and Accountability Standard which requires landlords to be open with tenants and treat them with fairness and respect so they can access services, raise concerns, when necessary, influence decision making and hold their landlord to account. The Neighbourhood and Community Standard which requires landlords to engage with other relevant parties so that tenants can live in safe and well-maintained neighbourhoods and feel safe in their homes. The Tenancy Standard which sets requirements for the fair allocation and letting of homes, as well as requirements for how tenancies are managed by landlords. Consumer Standards The regulator will be inspecting housing providers from April 2024 and run in four-year cycles.

2.2 To date, CBC have attended regulator meetings and workshops with the Regulator and created a central hub for collating evidence. Each requirement has been assessed and gaps identified with associated improvements captured. Engagement with managers and team leaders has also taken place. An initial improvement plan was developed, and additional resources have been secured.

- 2.3 This programme of change is required to pull together the wide-ranging actions from the initial improvement plan, and develop them into projects for delivery, including understanding requirements around resource, budget, timescales, risks and overall impact.
- 2.4 This Improvement Programme will deliver on CBC's obligations as a Local Authority to continually meet and comply with the Regulator of Social Housing's recently established Consumer Standards.
- 2.5 This will be achieved through a resourced programme plan and associated programme structure and governance, with individual projects and outcomes prioritised from a risk management perspective, to ensure deliverables are achieved on time and in priority order.
- 2.6 Our vision and ambition, shared with the Cabinet, is to develop into an exemplar position, primarily for our residents of Cheltenham to ensure we can evidence we are keeping families safe in their homes. This vision includes recording and monitoring customer data to provide high quality, transparent services into the future, while demonstrating the importance and the value of our tenant voice throughout. Alongside this, our vision is to work with the Regulator for Social Housing, and ultimately achieve a C1 RSH rating.
- 2.7 A C1 grading means that, overall, the landlord is delivering the outcomes of the consumer standards, they are making effective use of their own systems to identify and address potential issues and areas for improvement. This includes improvements to their stock and the services they provide to tenants. It is expected that even where a landlord is assessed as C1 it will continue to review, evaluate and improve its services to tenants.

5 Reasons for recommendations

- 3.1 Cabinet Housing Committee require oversight and progress updates on the delivery of the Consumer Standards Improvement Programme to provide assurances that CBC is on track to comply with the Consumer Standards as soon as reasonably possible.

6 Alternative options considered

- 4.1 A workstream approach to the programme plan has been considered and rejected due to the nature of the work required for delivery, as well as the associated governance structure that would be required. A traditional programme made up of multiple related projects has been agreed by the Senior Responsible Owner and Programme manager as the best method to ensure a successful delivery.

7 Consultation and feedback

- 5.1 Consultation on resource, capacity and priorities has taken place with key stakeholders in the organisation. The programme is a balance of priority and risk to the Council of non-delivery vs the availability of resources to deliver alongside operational delivery.

8 Key risks

- 6.1 Risks on this risk assessment are reflected in the programme risk register and are being closely monitored and mitigated.

Report author:

Claire Hughes, Director of Governance and Customer Services, Claire.hughes@cheltenham.gov.uk

Appendices:

- i. Risk Assessment
- ii. Equality Impact Assessment – Screening –(to be included in all Cabinet and Council reports)
- iii. Consumer Standards Improvement Programme Plan
- iv. Programme Reporting summary December 2024

Background information: n/a

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - -5)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
R006	IF there isnt sufficient housing or technical consumer standards knowledge and experience within the decision making body supporting the programme THEN CBC could make the wrong decisions linked to priority, resource and scheduling which could negatively impact the delivery of the programme.	Claire Hughes	Major (4)	Possible (3)	High	Reduce	Recruitment of 2 Housing Directors to senior leadership and part of programme board. Technical assurance and expertise in consultant Dean Epton, to support on prioritising delivery Pennington's 'training for leadership training (2 half days) - prior to transition	Gareth Edmundson	31 st March 2025
R013	IF scope is too large THEN there is a risk that the organisation will not be able to deliver and/consume the required changes.	Lou Foster	Major (4)	Likely (4)	Critical	Accept	Two stage approach to building the plan will help mitigate this risk (get compliant and then work towards C1)	Lou Foster	31 st March 2026

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - -5)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
R010	IF the programme plan is not scheduled to take into consideration resource, capacity and priority THEN progress of the delivery of the plan could be stalled or slowed down.	Lou Foster	Major (4)	Unlikely (2)	High	Reduce	Resource, capacity and priority all being taken into consideration in the development of the plan. Resource discussions need to take place with managers and teams before full plan can be signed off	Lou Foster	15 th January 2025
R011	IF related projects are not consistently managed as a programme or interdependencies are not identified THEN there is a risk of gaps / overlap in scope and ultimately outcomes of the programme will not be met.	Lou Foster	Major (4)	Unlikely (2)	High	Reduce	Work ongoing to build programme of related projects. Experienced programme manager. Knowledgeable and well informed programme board overseeing outcome delivery	Lou Foster	31 st March 2026
R020	IF we do not do sufficient communication and awareness raising of the consumer standards	Katie Sandey	Moderate (3)	Possible (3)	Medium	Reduce	Comms strategy and plan in development. Awareness		

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	programme with the organisation THEN there will be a lack of buy in, clarity and support for the delivery of the programme						raising and training required asap		
R037	IF legislation continues to change and evolve and we do not track and monitor these changes with expert oversight THEN we could be unable to remain compliant which will make it difficult to maintain C1 status.	Claire Hughes	Major (4)	Unlikely (2)	High	Reduce	Identify individual responsible for understanding the consumer standard legislation in detail an able to communicate this across the business. Share sector insight with heads of service	Claire Hughes	31 st March 2026
R046	IF we do not track the original improvements listed in the CS Action Plan and Penningtons report and track where they specifically relate to the CS and its controls THEN we risk loosing key identified improvements, manage scope creep and ensure clear progress	Lou Foster	Moderate (3)	Unlikely (2)	Medium	Reduce	Reference numbers and cross referencing required across programme plan and all other reports / recommendations	Lou Foster	31 st March 2026

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - -5)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	reporting against the CS.								
R062	IF we do not consult on the drafted plan with those that will be involved in the projects, THEN we could miss vital knowledge of knowing what projects should go before another and therefore risk the scheduling of the programme needing to be done again which could have an impact on the timeline of the programme.	Lou Foster	Moderate (3)	Rare (1)	Medium	Reduce	Plan to consult on the programme plan once it's 'ready	Lou Foster	15 th January 2025
R063	IF we do not share organisational risks when they arise, THEN the impact on the organisation could divert the delivery of the programme.	Lou Foster	Moderate (3)	Unlikely (2)	Medium	Reduce	Plan to share all high and critical risks with programme board. SRO will oversee all risk (current plan - -- and revise if needed)	Claire Hughes	31 st March 2026
R015	IF CBC do not recognise that a cultural shift in the way siloed housing teams have worked historically is	Gareth Edmundson	Major (4)	Likely (4)	Critical	Accept	Strategic direction from senior leadership team to set the tone of	Gareth Edmundson	31 st March 2026

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	required, and the work involved in this THEN the outcomes of the programme will take longer to deliver and CBC are unlikely to achieve a C1 rating without this cultural shift.						expectations around compliance with the consumer standards and how this impacts on colleagues day to day in their different roles		
R016	IF challenging stakeholders divert the programme or do not deliver on agreed actions THEN the objectives may not be achieved as planned.	Lou Foster	Major (4)	Possible (3)	High	Reduce	Undertake RACI on stakeholders Consider use of further stakeholder analysis tools if required Consider dedicated role on programme team to manage organisation stakeholders	Lou Foster	15 th January 2025
R014	IF management of programme/project change (scope, time, cost) is ineffective THEN there is a risk of delay, quality issues and budget overrun.	Lou Foster	Major (4)	Unlikely (2)	High	Reduce	Dedicated management of change control to role within programme Change register set up	Abi Masters-Safe	31 st March 2026

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R021	IF compliance data isnt updated within the housing management system and takes place outside of the system THEN CBC may continue to remain non-compliant with the consumer standards due to inability to evidence	Paul Leo	Critical (5)	Unlikely (2)	Critical	Reduce	Programme plan reflects need to improve compliances process governance and include all data on QL. Penningtons has backed this up through their review. QL gap analysis.	Lou Foster	31 st March 2026
R032	IF we do not deliver training on Consumer Standards and sharing of best practises prior to roles, responsibilities and accountability being agreed THEN we will get resistance to this change.	Gareth Edmunds on	Major (4)	Possible (3)	High	Reduce	Schedule project to deliver training and awareness raising as a priority	Caroline Walker	31 st March 2025
R035	IF CBC do not have access to specific and specialist technical resource to deliver system, data and reporting requirements THEN CBC will remain non-compliant due to not having in-house resource to a sufficient technical	Gareth Edmunds on	Major (4)	Possible (3)	High	Reduce	Plan to firm up reporting and system development resource to support cross organisation requirements	Gareth Edmundson	31 st March 2026

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - -5)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	level to deliver requirements.								
R049	IF we do not plan communications and plan for the impact of a C1/C2 rating then we could see the importance of the programme changing and have resistance to change for how we view and manage compliance. IF we do not plan for a C3/C4 rating then we risk not managing the impact and assurance we can provide to customers and members, along with the impact on colleagues.	Katie Sandey	Moderate (3)	Likely (4)	High	Reduce	Require communication strategy for managing the messages related to a self-referral assessment or an IDA.	Lou Foster	31 st March 2025
R055	IF we don't have a process for future audits and ensuring change happens when required THEN we risk the programme work being out of date and therefore having a lack of assurance in the sustainability of the programme work and the	Claire Hughes	Moderate (3)	Possible (3)	Medium	Reduce	Assurance process required. No capacity to consider this currently and focus on getting to compliance. Use of control plans, measures and structured change control.	Lou Foster	31 st March 2025

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - -5)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	benefits it produces.								
R060	IF we make changes to processes and policies that specify specific information and structures or roles change, THEN these changes to processes and policies might need to be updated again. This could impact the timeline on projects.	Gareth Edmunds on	Moderate (3)	Likely (4)	High	Accept	Difficult to mitigate until further information available on any organisational restructure	Lou Foster	31 st March 2026
R058	IF we do not gather evidence of the work that has been completed that supports us to being compliant then we risk not assuring the work required has been done and saving the evidence in a central library ready for an IDA which will help in the future.	Lou Foster	Major (4)	Likely (4)	Critical	Reduce	Currently no documented approach to this. Within plan to develop	Abi Masters-Safe	31 st March 2026