

Spotlight on: attitudes, respect and rights– Brent Council housing management service – self-assessment – July 2024

Recommendation		Current position	Proposed actions
Culture, vision, and values			
1	Review your mission statement to ensure it is reflective of your current, and future, service. Consider at Board level if you are assured your current approach to vulnerabilities is working.	The Council does not have a set mission statement re. supporting vulnerable residents, although does have an internal Accessibility Guidance document for staff which sets out information, advice and guidance for staff to ensure any activity they undertake in the course of their work is accessible to everyone. Awareness of this document is relatively low currently and so needs to be communicated more widely. The Housing Management Service has recently developed an improvement plan which incorporates a commitment to developing a vulnerability and reasonable adjustments policy for the service in line with the Ombudsman's recommendations. Our approach to vulnerabilities will be reviewed as part of the development of this policy.	1. Embed the corporate accessibility guidance document as part of the housing management induction process for staff to improve awareness of it. 2. Review our approach to supporting vulnerable residents and develop a vulnerability / reasonable adjustment policy for the housing management service which: - Is cohesive with the corporate accessibility guidance; - Is reflective of the Ombudsman's' recommendations; and - Meets the specific needs of our tenants.
2	Undertake a review at Board level as to whether you are currently offering a 'human-centric' service provision. If not, identify the barriers to this and what needs to change in order to introduce and then embed this culture and ethos.	A new housing management improvement board is due to be set up which will be where the delivery of the above-mentioned improvement plan and review of our approach to vulnerabilities will be monitored.	3. Set up the housing management improvement board as agreed at CMT, to monitor the ongoing improvement plan.
3	Consider adopting a values-based recruitment model to improve resident/landlord relationships.	The housing management service has been working with HR to review and improve the recruitment process. Throughout the recent restructure recruitment, interviews have prioritised behaviours and values of new starters, acknowledging that specific technical skills can be developed once onboard. There has also been specific focus vulnerable tenants during interviews, for example, a recent question asked during interview was "What is your understanding of our responsibilities towards vulnerable tenants, and what would you do to ensure that they are appropriately supported by the service?".	

What does the resident need?			
4	Review your vulnerability policy in conjunction with current practice. Is the policy being implemented? If not, identify where the disconnect lies.	Whilst there are instances where vulnerabilities / individual needs of tenants are being proactively considered e.g. 'household audits' during planned works to assess needs and the implications of the work re. this so suitable support can be put in place, this is not documented. There is no vulnerability policy / strategy currently in place for the housing management service. There is also some lack of awareness re. correct safeguarding referral routes. This needs to be clarified and guidance documentation created for staff to refer to.	See action 2. 4. Confirm safeguarding referral routes for housing staff, confirm forms and key contacts are correct and create guidance document.
5	Implement a vulnerability strategy, including how it is defined, who assesses, and what the review process is. This must be in line with The Equality Act, the Human Rights Act and the Care Act. This should be co-produced with residents, and consider any future good practice guidance published by the Housing Ombudsman, following engagement and consultation.	As above.	As above.
6	Implement a specific reasonable adjustments policy.	There is no reasonable adjustment policy currently in place for the housing management service.	See action 2.
7	Test the vulnerability and reasonable adjustments strategy and policy against the '3Rs' on vulnerable residents – recognise, respond and record.	NA	5. New vulnerability and reasonable adjustments policy to include reference to the three R's – recognise, respond and record.
8	Introduce minimum staff training requirements such as Dementia Friends, and training on customer care, mental health, learning disabilities, and sight and hearing loss.	The housing management service are in the process of developing and implementing a new induction offer which includes a set of core training courses for new starters. These courses range from more general i.e. 'supporting vulnerable customers' and 'customer care' through to specific vulnerability related courses s i.e. 'working effectively with hoarders'. This training programme will be embedded from end of Q2 2024-25 and will be reviewed at end of each financial year.	6. Moving forward, use analysis of demographic data, characteristics and known vulnerabilities across our tenant population to inform the refreshed core training programmes on an annual basis.
9	Consider a dedicated taskforce for vulnerability.	There is no specific taskforce for vulnerability currently in place, this may come out of our review and policy development work in this area. We could also consider nominating manager level 'leads' in key strategic areas i.e. vulnerability/safeguarding lead, ASB lead, property services lead.	NA.

Look to the future			
10	Carry out your own “Resident of the Future” forecast for the next ten years. Draw upon the available information around demographics, both locally and nationally, and identify where you foresee the gaps being.	Whilst light touch assessments of demographic information held has been done (and some data quality issues identified), a specific analysis has not been carried out.	7. Work with the Change and Customer Insight service to run a ‘resident of the future’ forecast and develop an approach to addressing gaps identified.
11	Consider the ageing communities specifically in rural and coastal areas, with reference to Professor Whitty's report	Approximately 27% of our tenant population is aged 65 or over, with a further 27% aged 55 – 64.	8. Consider specific staff training for supporting aging tenants and ensure the reasonable adjustments policy supports adjustments for older people as needed.
12	Devise an action plan for what you need to start putting in place from now onwards to ensure you are ready to meet the needs of your future residents. This should include the anticipatory requirement regarding reasonable adjustments.	Any actions will be agreed following the completion of the ‘resident of the future’ exercise to be carried out (see recommendation 10, action 6).	
Complaint handling			
13	Raise awareness of the complaints procedure and ensure it is accessible for residents who may face barriers to raising a complaint, as required by the Complaint Handling Code	Information about how to make a complaint, our complaints policy and procedure, complaints performance and escalation options are available on our website here . The policy includes reference to accessibility options if someone needs them. The Council has previously supported national awareness campaigns such as ‘Make Things Right’ to ensure tenants who need support know how to make a complaint.	9. Include complaints awareness as part of the communications plan for the housing management service moving forward.
14	Ensure the complaints policy permits complaints about staff conduct, attitudes and approach.	Brents complaints policy does permit complaints about staff conduct, attitudes and approach.	
15	Establish and enforce a clear process for how complaints about bullying/discrimination will be investigated.	Complaints about bullying or discrimination are managed in line with our usual complaints process.	
16	Contact restriction policies must set out clear timescales, review and appeals process. Where there is single point of contact, this should be applied consistently.	The Council has a Vexatious Complaints Policy which includes reference to contact restrictions as an optional action. The policy does not set any generic timescales for review, instead requires the relevant Director to set a timeframe for each individual case.	10. Consider developing generic timescales for review of contact restrictions to ensure consistency and fairness in these cases. 11. Consider publishing the vexatious complaints policy on the website.
17	Calls to be recorded, either a physical recording or a contemporaneous telephone record.	All calls to our corporate contact centre (which is the first line of contact for tenants reporting repairs etc. by phone) are recorded. Calls to individual officer phone lines are not recorded.	

Case handlers			
18	Landlords need to ensure they provide clear explanations; repeat information where needed, including in different formats; offer face-to-face contact as much as possible and a named point of contact; investigate concerns and share the outcome; recognise when things have gone wrong, apologise and explain how these will be addressed; and know when to make appropriate referrals to agencies and whom to signpost to. Underpinning all of these should be a baseline of empathy and respect.	Whilst it is expected that complaint case handlers meet all of the actions set out here and complaint response templates cover some of this, no specific guidance documentation is in place for staff to refer to. The engagement team work with involved residents on a re-occurring basis to carry out a scrutiny exercise re. complaint responses and this recommendation can be incorporated into their checks. There is no internal approach to regularly auditing complaints responses although our improvement plan does include this as a commitment.	12. Develop guidance document for staff on expectations re. complaint responses. 13. Ask the involved residents to utilise the recommendation re. complaint responses set out here in their next scrutiny exercise. 14. Develop an internal approach to auditing complaint responses.
19	Ensure disability or language needs are routinely considered as part of the complaints process and that extra accessibility support, or accessible materials, are offered where appropriate.	The complaints policy includes reference to accessibility options available to those who need them and the understanding is that this should be being offered where appropriate during the complaints process.	15. Use complaint auditing to confirm accessibility support is being offered.
20	Identify where more specific training, guidance or support is needed to fulfil your role. For example, do you feel under confident in having what may be seen as a difficult conversation or delivering bad news?	Under the in-house Skills Academy, the service is developing an induction programme, along with a reactive offer to respond to training needs as and when they arise. This can incorporate any training need identified re. responding to complaints.	16. Carry out complaint response spot checks and gather feedback from complaint response handlers to identify any training requirements.
21	Maintain accurate records of residents' vulnerabilities and individual circumstances.	Data held re. resident vulnerabilities in the service's CRM system is unreliable due to issues with data quality some key functions spanning across multiple systems. The Council is currently in the process of taking a strategic look at this issue, working across areas like public health, adult social care and housing to develop a new approach to sharing and maintaining vulnerability data.	17. Feed into the corporate work ongoing re. improving our approach to recording and maintaining resident vulnerability data.
22	Use mandatory checks, such as annual boiler checks, as a 'touchpoint' opportunity to undertake welfare checks with residents.	The service is implementing a programme of tenancy audits which include welfare checks. Each property will receive a tenancy audit at least once every 4 years. Our contractors have 'concern cards' which they can use to feedback to the service if they notice anything they want to flag re. tenant welfare.	
23	Although it is important for landlords to know the vulnerabilities and individual circumstances of its residents and any associated legal duties, the above	This will be considered as part of the review of our approach to vulnerability and subsequent	

	approach should apply to all residents as, fundamentally, it is about a high standard of customer care and a human-centric approach to service delivery.	development of the vulnerability and reasonable adjustment policy.	
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