City of London Corporation Committee Report

Committee: Housing Management and Almshouses Sub Committee	**Dated:** 1 July 2026
Subject: Housing Matters Update	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Diverse engaged communities Leading Sustainable environment Providing Excellent Services
Does this proposal require extra revenue and/or capital spending?	**No**
If so, how much?	**N/A**
What is the source of Funding?	**N/A**
Has this Funding Source been agreed with the Chamberlain's Department?	**N/A**
Report of: Judith Finlay, Executive Director of Community & Children's Services	For Decision and Information
Report author: Peta Caine, Director of Housing	

Summary

The purpose of this report is to update members of the Housing Management and Almshouses Sub-Committee on some key issues currently being dealt with by the Housing Team. Namely:

For Decision

- Local Lettings Policy York Way
- Updated Pets Policy

For Information and Discussion

- Housing Services Recruitment Update
- Local Lettings Update – Sydenham and Black Raven Court
- Access to Homes Policy – Update
- Asset Management Strategy Refresh Progress
- Housing Design Guide Update
- Voids Process and Improvements being made
- Housing Performance Update - April 2025 – March 2026
- Pennington Choices Compliance Review
- Housing Complaints Policy – Housing Ombudsman Service Review

Items for Decision

1. Local Lettings Policy York Way

Local Lettings Policy York Way Introduction
The Local Lettings Policy (LLP) sets out the framework for allocating the new homes and enables the City Corporation to make direct offers outside of the Choice Based Lettings scheme. The policy reflects the previously agreed nomination arrangements between the City of London Corporation and the London Borough of Islington, with 46 homes allocated to City of London nominees and 45 homes allocated to Islington nominees.

Under the LLP, the City Corporation will prioritise:
- Existing York Way Estate residents
- Holloway Estate residents
- Applicants on the wider Housing Register

The approach is designed to:
- Support residents with identified housing need, including overcrowding and medical
- Enable transfers that release under-occupied homes
- Contribute to the creation of a balanced and sustainable community

An Equality Impact Assessment (EQIA) has been completed to assess the potential impact of the LLP on residents and applicants with protected characteristics. The EQIA identifies:
- Potential positive impacts, particularly in supporting households in housing need and improving access to suitable accommodation
- Some risks of differential impact, particularly due to the place-based prioritisation approach
- No evidence of unlawful discrimination, with mitigation measures in place to monitor and address any unintended impacts

The EQIA is informed by:
- Interim findings from the ongoing household survey
- Housing management and allocations data
- Operational insight and service feedback

The household survey is still being undertaken, and the EQIA recognises that the evidence base will continue to be strengthened. A commitment is included to:
- Complete the survey and update the analysis as necessary
- Monitor lettings outcomes by protected characteristics
- Review the policy and its impact one year from approval

Recommendation:
Members are asked to approve the Local Lettings Policy for York Way Estate, noting that an Equality Impact Assessment has been completed and appropriate monitoring and review arrangements are in place.

Appendix 1

Local Lettings Policy for the 91 Homes at York Way Estate, London Borough of Islington

Background

1. A development of 91 new homes is being provided by the City of London Corporation (the "City") at York Way Estate, N7, in the London Borough of Islington ("Islington").

2. These new homes will be let at social rent levels. The scheme provides a mix of studio, one-, two-, three- and four-bedroom homes as set out below the table also details the previously agreed split with LB Islington:

Type	Total	City of London	LB Islington
Studio	17	17	0
One bed	25	8	17
Two bed	21	8	13
Three bed	25	11	14
Four bed	3	2	1
Total	**91**	**46**	**45**

3. The new homes are being delivered as part of the City's strategic commitment to increase the supply of homes for social rent. The letting of these homes will be subject to this Local Lettings Policy ("LLP").

Purpose of the Local Lettings Policy

4. This LLP sets out how these homes will be let and which households will be prioritised for allocation.

5. The LLP enables the allocation of new homes to be managed outside the usual Choice Based Lettings process, via the use of direct offers to applicants on the Housing Register. This approach ensures that these homes and the homes made available through transfer of existing COL tenants are allocated to those most in need and that the best use is made of the available housing stock.

Objectives of the Local Lettings Policy

6. The LLP for York Way supports the following objectives:
   - To increase the supply of social rented homes and provide greater opportunities for households in housing need.

- To prioritise existing COL tenants where a move would better meet their housing needs and support effective use of the Corporation's housing stock.
- To support the creation of a sustainable and balanced community at York Way and the surrounding area, including nearby estates.
- To enable the City Corporation to meet the needs of households in priority need, including those who are overcrowded, under-occupying, or have medical or welfare needs.
- The impact of this approach, however, is an increase in empty homes that have to be serviced as a result of internal moves and the fact that existing residents are given priority rather than homeless households living in temporary accommodation.

Local Lettings Policy for York Way Estate

7. There is a previously agreed allocation split between the City of London Corporation and the London Borough of Islington:

    - 46 homes (51%) will be allocated to City of London nominees
    - 45 homes (49%) will be allocated to LB Islington nominees

8. Homes allocated to LB Islington nominees will be offered to applicants who qualify under that authority's Housing Register or are existing tenants of that authority.

9. The City of London Corporation will retain responsibility for the administration of all lettings.

10. This Local Lettings Policy operates in conjunction with the City of London Housing Allocations Scheme.

Prioritisation for City of London Nominations

11. Homes allocated to City of London nominees will be prioritised in the following order:

    a. **Existing York Way Estate residents -** Priority will be given to secure tenants currently living on the York Way Estate, particularly where a move would address overcrowding, under-occupation, or other identified housing needs.

    b. **Holloway Estate residents -** Where there are insufficient eligible applicants from York Way Estate, priority will then be given to residents living on the nearby Holloway Estate.

    c. **City of London Housing Register applicants -**Remaining homes will be allocated to other applicants on the City of London Housing Register in accordance with the Housing Allocations Scheme.

12. Priority will be applied on a reasonable endeavours basis. Where no suitable or eligible applicants are identified within a priority group, or where offers are refused, the City Corporation will move to the next priority group to ensure that homes are let

efficiently.

13. This does not guarantee that applicants within a priority group will be made an offer, as allocations are also subject to eligibility, suitability, and availability of appropriate properties.

Exception / Discretion

14. In exceptional circumstances, the City of London Corporation reserves the right to depart from the priority order set out in this Policy where this is necessary to:
    - address urgent housing need;
    - respond to safeguarding concerns; or
    - ensure the best use of the available homes.

15. Any such decisions will be made in accordance with the Housing Allocations Scheme and will be clearly documented, including the rationale for the decision.

Assessment and Ranking

16. Within each priority group:

    - Priority will be determined based on assessed housing need, including overcrowding, under-occupation, and medical or welfare grounds.

    - Where applicants refuse a reasonable offer of accommodation, this will be managed in accordance with the City of London Housing Allocations Scheme, including any applicable consequences for future offers.

    - Where applicants have the same level of need, priority will be determined by their priority date on the Housing Register.

17. Applicants (including existing City of London tenants and nominations received from LB Islington) may be excluded where there is evidence of serious or persistent tenancy breaches, including rent arrears, anti-social behaviour, or other breaches of tenancy conditions, in accordance with the Tenancy Agreement, Tenant Handbook, and Housing Allocations Scheme.

18. Homes will be allocated in accordance with bedroom need and overall property suitability, taking account of:
    - household size and composition
    - medical or mobility requirements
    - any specialist features of the property

19. Applicants must be assessed as suitable for the specific property being offered.

20. The City will maintain clear records of allocation decisions, including how priority and suitability criteria have been applied, to ensure transparency and consistency.

Tenancy type

21. Where homes are allocated to tenants who previously held a secure tenancy (whether with the City of London or LB Islington), a secure tenancy will be granted.

22. All other new tenants will be granted a tenancy subject to the successful completion of an introductory tenancy period.

Duration

23. This Local Lettings Policy will apply two years from the date of approval.

24. At the end of this period, the Policy will either:
    - be reviewed and re-approved; or
    - lapse, after which allocations will revert to the Housing Allocations Scheme if this has not occurred already.

Equalities

25. This LLP has been developed in line with the Equality Act 2010.

26. Monitoring will be undertaken to ensure that the policy operates as intended and does not result in unintended adverse impacts on any group.

27. The operation of this Policy will also be monitored to ensure it is being applied consistently and achieving its intended objectives. Any identified issues will inform future review of the Policy.

Appendix 2

Equality Impact Assessment Form

The Equality Impact Assessment (EQIA) will identify how any proposed policies, practices, activities, service changes or procedures will impact or affect different groups or communities if implemented. It supports officers in assessing whether the impacts are positive, negative, or unlikely to impact each of the nine protected characteristic groups. The assessment will also demonstrate whether there are ways to proactively advance equity, equality, diversity and inclusion. An EQIA is required before you finalise your proposal, or it may not be legally compliant.

Section 1: To be completed by all

Proposal Title	Local Lettings Policy – York Way Estate (91 homes)
Details of the lead officer completing the Assessment/ Role responsible for the completion of the EQIA	Zoe Gayle Service Improvement Manager
Department Responsible:	Department of Community & Children's Services – Housing Service
Who has been involved in creating the EQIA: (please summarise/list stakeholders you have engaged with and how)	• Housing Management (policy development) • Allocations / Housing Needs teams • Informal input from officers with knowledge of York Way and Holloway estates • Review of complaints themes from recent lettings (internal learning) At this stage, no formal resident consultation has been undertaken specifically on the LLP prioritisation approach, which limits direct evidence of resident perspective.
Date of Initial assessment:	04/06/2026
Dates of review (as applicable)	To be reviewed alongside the Local Lettings Policy review (2 years from approval).

1.PROPOSAL OVERVIEW

What does the proposal aim to achieve? Please outline your proposal below

➔ If no potential impacts are identified at this stage, proceed to **Section 3**

➔ If you believe there may be potential negative impacts, continue to **Section 2, Steps 2,3,4, and 5** to complete a full EQIA, then move to **Section 3**

➔ If you identified any positive impact, please record and monitor at **Section 2, Step 5,** then move to **Section 3**

Please feel free to attach supporting documents/ information

The proposal introduces a Local Lettings Policy (LLP) to manage the allocation of 91 new homes at York Way Estate. The LLP enables the City of London Corporation to make direct offers outside of the Choice Based Lettings system, prioritising:

- Existing York Way Estate residents
- Holloway Estate residents
- Wider Housing Register applicants

The policy applies eligibility, suitability and housing need criteria in line with the Allocations Scheme.

Intended outcomes:

- Make best use of new housing stock
- Support existing residents with identified housing needs (e.g. overcrowding, medical needs)
- Enable transfers that release under-occupied homes back into the system
- Support the creation of a sustainable and balanced community

The LLP introduces place-based prioritisation, which may result in differential impacts depending on geography, housing need and socio-economic circumstance.

Evidence base and current limitations: A household survey is currently being undertaken, including engagement with lead and joint tenants. The survey is collecting data on:

- Household composition
- Disability and health needs
- Ethnicity and language
- Socio-economic factors

Interim data from this survey, alongside existing housing management and allocations data, has been used to inform this assessment. However, the dataset is not yet complete, which limits the depth of equalities analysis at this stage. This is acknowledged and will be addressed through ongoing data collection and review.

Section 2: To be completed for a full EQIA

2. EVIDENCE AND IMPACT ANALYSIS

Please highlight the potential impact on these groups, actions taken to mitigate impact and advance equality, diversity and inclusion (include data/evidence upon which the analysis is based)

Protected Groups:

- Age
- Disability

- Gender Reassignment
- Marriage & Civil Partnership
- Pregnancy & Maternity
- Race
- Religion & Belief
- Sex
- Sexual Orientation

Additional Groups

- Socio-economic background
- Care leavers
- Carers & Parents
- Veterans

Where relevant note relevant intersectional impacts: where combinations of different group identities may result in unique or compounded impacts.

This assessment draws on:

- Interim household survey data (including lead and joint tenants and household members)
- Housing register and allocations data
- Operational insight from Housing Management and Housing Needs teams
- Complaints and service feedback, including known issues relating to repairs, estate environment and satisfaction levels

The household survey is ongoing; therefore, some equality data remains outdated or incomplete. Impacts identified below combine available evidence with professional judgement and will be reviewed as data improves.

Protected Groups

Age

Impact:

- Potential positive impact for overcrowded families and older residents needing more suitable accommodation
- Younger single applicants not residents on the estate may be comparatively disadvantaged due to prioritisation

Evidence:

- Housing need (e.g. overcrowding/under-occupation) is a key driver in allocations
- Interim survey data identifying household composition

Mitigation:

- Apply needs-based criteria alongside residency priority
- Monitor lettings by age group

Disability

Impact:

- Positive impact where accessible or adapted homes are allocated to residents with identified needs
- Risk if incomplete data limits identification of hidden or emerging needs

Evidence:
- Survey capturing disability/health needs (in progress)
- Known service issues (repairs, lifts) disproportionately affecting disabled residents

Mitigation:
- Dedicated resource allocated to use survey data to upload housing management records
- Prioritise medical need within allocations framework

Gender Reassignment
Impact:
- No direct impact identified
- Risk of indirect impact if privacy, safety, or harassment issues arise in allocation or rehousing

Evidence:
- No specific dataset currently held at estate level

Mitigation:
- Ensure allocations and tenancy management processes remain inclusive and confidential
- Address any reported safety concerns promptly

Marriage & Civil Partnership
Impact:
- Neutral overall
- Household-based allocations may positively support couples requiring appropriate accommodation

Evidence:
- Household composition data (survey and housing records)

Mitigation:
- Ensure consistent application of allocations policy

Pregnancy & Maternity
Impact:
- Positive impact where overcrowded or unsuitable housing is addressed
- Risk if emerging needs are not captured early due to incomplete data

Evidence:
- Housing Needs data highlighting overcrowding

Mitigation:
- Allow flexibility to respond to changing household needs
- Ongoing engagement through survey and housing management activity

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Race

Impact:
- Risk of indirect disadvantage if wider housing register applicants are not prioritised

Evidence:
- Survey includes ethnicity and language data (in progress)
- Known need for accessible communication

Mitigation:
- Monitor lettings outcomes by ethnicity
- Provide translation/accessible communication where required

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Religion & Belief
Impact:
- No direct impact identified
- Potential indirect impact where housing location or property type does not meet cultural or religious needs

Evidence:
- Limited estate-specific data

Mitigation:
- Consider individual needs where identified
- Ensure fair and consistent allocation processes

Sex
Impact:
- Neutral overall

Evidence:
- Housing register and survey data

Mitigation:
- Monitor allocations and outcomes by gender

Sexual Orientation
Impact:
- No direct impact identified
- Risk of indirect impact linked to safety or vulnerability if not appropriately considered

Evidence:
- No specific dataset currently held

Mitigation:
- Ensure inclusive, non-discriminatory allocation practices
- Respond to any reported concerns

Additional Groups
Socio-economic background
Impact:

- Strong positive impact: LLP prioritises residents with existing housing need
- Reflects levels of dissatisfaction linked to estate conditions

Evidence:
- TSM data indicating lower satisfaction linked to environment and services
- Known levels of overcrowding and housing need

Mitigation:
- Target allocations to those in greatest need
- Monitor outcomes and resident satisfaction

Care Leavers
Impact:
- Potential disadvantage if not resident on estate and therefore not prioritised

Evidence:
- No estate-specific dataset

Mitigation:
- Continue to meet statutory duties through wider allocations scheme
- Consider exceptions where appropriate

Carers & Parents
Impact:
- Positive impact for families requiring larger or more suitable homes
- Risk where needs are not fully captured in incomplete dataset

Evidence:
- Survey capturing household composition
- Housing Needs data

Mitigation:
- Ensure flexibility within allocations criteria
- Ongoing engagement and data collection

Veterans
Impact:
- No direct impact identified

Evidence:
- No specific dataset available

Mitigation:
- Consider on a case-by-case basis through allocations scheme

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Intersectional Impacts (Key Risks)
The following combined characteristics may result in compounded impacts:

- **Disabled + older residents:** greater reliance on functioning lifts/repairs and need for accessible homes
- **Low income + families + overcrowding:** higher likelihood of benefiting from LLP but also greater vulnerability if not prioritised
- **Ethnic minority + language needs:** risk of exclusion if communication is not accessible
- **Single parents (often female) + socio-economic disadvantage:** may face compounded housing need and financial pressure
- **Residents affected by estate conditions + disability or age:** may experience disproportionate impact from environmental issues (e.g. lifts, repairs)

Mitigation across groups:
- Completion of household survey to strengthen data
- Monitoring lettings outcomes by protected characteristics
- Post-implementation review to identify unintended impacts
- Ongoing resident engagement and feedback mechanisms

3. STAKEHOLDER ENGAGEMENT

Outline any consultation/engagement activity and additional information gathered not outlined above (if relevant)

Include information on stakeholders involved, and methods used for engagement / consultation.

Describe any further work required on proposals as a consequence of engagement/consultation (if relevant)

Engagement activity has been undertaken through a combination of internal officer input and ongoing resident data collection:
- Housing Management, Allocations and Housing Needs teams have contributed to the development of the Local Lettings Policy (LLP).
- Officers with operational knowledge of York Way and neighbouring estates have provided contextual insight, including learning from complaints and previous lettings.
- A household survey residents is currently being undertaken. This includes engagement with lead and joint tenants and captures data on demographics, housing need, disability, language, and household composition.
- Interim findings from this survey have been used to inform the EQIA; however, the dataset remains incomplete at the time of this assessment.

At this stage:
- No formal consultation has been undertaken specifically on the LLP prioritisation framework, and this is acknowledged as a limitation.
- Engagement to date has focused on evidence gathering rather than testing policy proposals with residents.

Further engagement planned:

- Completion of the household survey to strengthen equalities evidence.
- Ongoing feedback routes via Housing Officers, tenancy audits and resident communication channels.

4. DECISION MAKING (MITIGATIONS AND CHANGE)

After completing steps 1-3, please outline your informed decision.

Possible outcomes could be that:

a. **No changes are required; there is no negative impact or discrimination**
b. **Available actions have been taken to remove or minimise potential negative impacts**
c. **Adjustments to the proposal to remove or minimise potential negative impacts – monitoring and regular review will take place to manage this with a view to taking further mitigation actions**
d. **Where a negative impact is identified that is not unlawful discrimination, or where discrimination can be objectively justified- justify and continue with the proposal: there may be other factors (such as other proposal aims or financial constraints) that make it reasonable to adopt the proposal, despite the negative impact – potential impacts will be monitored and kept under regular review. Please seek advice from the EDI team and the Legal team before making the decision.**
e. **You decide not to take the proposal forward.**

Following assessment of the available evidence, including interim survey data and operational insight, the following conclusions are reached:

- The LLP does not introduce direct discrimination.
- There is potential for **indirect differential impact** due to the place-based prioritisation, particularly where protected characteristics intersect with geography and housing need.

Mitigations in place:

- Allocations will be needs-led and suitability-based, ensuring decisions consider disability, household size, medical need and safeguarding.
- Case-by-case assessment provides flexibility to address:
  - mobility and accessibility needs
  - language or communication barriers
  - complex household or support requirements
- Transparent decision-making and record keeping will allow scrutiny of outcomes.
- Monitoring will track outcomes by protected characteristic to identify any emerging inequalities.

Allocation split:

- The LLP includes an agreed allocation split of 46 homes to City of London (51%) and 45 homes to LB Islington (49%), delivered in partnership.

- Lettings to Islington nominees will be made in accordance with LB Islington's allocations arrangements and are not expected to undermine the overall equalities objectives, given the shared focus on housing need and statutory compliance.

Conclusion:
- The proposal is considered to have a neutral to positive equalities impact overall, particularly in enabling existing residents with identified housing need (e.g. overcrowding, medical need) to access new homes.
- Any residual risks will be managed through monitoring, review, and ongoing engagement.

5.MONITORING AND REVIEW

How will you monitor and review the impact (positive or negative) of the proposal once it has been put into effect, if so, how? What are the timescales for reviewing the EQIA once proposals are implemented?

This may take the form of an action plan.

The impact of the LLP will be actively monitored to ensure compliance with equality duties and to identify any unintended adverse outcomes.

Monitoring approach:
- Lettings outcomes will be tracked by:
  - protected characteristics (where data is available)
  - household type and need
  - nomination route (City vs Islington)
- Analysis will include:
  - allocation outcomes
  - refusal rates
  - tenancy sustainment indicators
- Interim household survey data will be updated as the survey completes and incorporated into future analysis.

Qualitative monitoring:
- Case reviews for any complex or adverse outcomes
- Feedback from Housing Officers and residents
- Follow-up engagement with tenants rehoused through the scheme

Review timescales:
- Annual summary reporting to senior management, Housing Improvement Board and Committee
- Full EQIA review aligned with LLP review (within 2 years of implementation)

Continuous improvement:
- Findings will inform adjustments to the LLP if required
- Additional mitigation actions will be introduced where any disproportionality is identified

Section 3: To be completed by ALL

6.RECORDING YOUR DECISION AND SIGN-OFF

1. Submit to your line manager for review and sign-off
2. Submit to Director or Chief Officer (as relevant) for sign-off
3. Where possible, share the final document with the corporate EEDI team

The Equality Impact Assessment identifies that:

- The Local Lettings Policy is justified in meeting its objectives of addressing housing need, supporting existing residents, and making effective use of new housing supply.
- The policy is broadly compliant with equality duties, with no evidence of unlawful discrimination.
- Potential indirect impacts arising from place-based prioritisation have been considered and are mitigated through:
    - needs-based allocation decisions
    - flexibility at case level
    - monitoring and review arrangements

The EQIA draws on interim findings from the ongoing household survey, including data from tenants and household members and will be updated as further evidence becomes available.
The proposal will proceed with monitoring, and any required adjustments will be made following review.

Sign off

1. Officer completing the EQIA

Name	Zoe Gayle
Job Title	Service Improvement Manager
Date	04/06/2026
Signature	Z.Gayle

2. Second Approval Manager

Name	
Job Title	
Date	
Signature	

3. Senior Manager or Chief Officer

Name	Peta Caine
Job Title	Director of Housing
Date	15 June 2026
Signature	Peta Caine

Once this form has been signed off, please send a copy of the form to the EDI Team: CSPT.EDI@cityoflondon.gov.uk

2. Updated Pets Policy For Approval

Background

In 2024, the Housing Service undertook an extensive resident consultation on the Pets Policy as part of the scheduled review of housing policies.

The consultation included a programme of independently facilitated workshops (both in person and online), delivered by Calm Mediation, alongside an estate-wide survey administered by an external research organisation (Acuity Research & Practice) to ensure a fair and transparent process.

This approach ensured that residents were well informed and able to meaningfully contribute to the review. A total of 1,235 responses were received from 2,745 issued surveys, representing a turnout of 45%. The results of the ballot were:

- **No:** 721 (58%)
- **Yes:** 496 (40.5%)
- **No response:** 18 (1.5%)

Updated Policy and Recommendation

Following approval by HMASC and implementation of the Pets Policy in November 2024, a further review has been undertaken to strengthen clarity and ensure compliance with the Equality Act 2010. This includes clearer recognition of assistance dogs and consideration of individual circumstances. This further review has also been informed by complaints analysis, staff consultation, and has been reviewed by Legal Services to ensure the policy is clear, proportionate, and legally robust.

The updated Pets Policy is now presented to Members for approval.

The revised policy does not introduce material changes to the existing approach or permitted pets (see Table A - Policy changes) Instead, it has been updated to:

- Improve clarity, structure and overall accessibility
- Introduce clearer definitions (including assistance dogs and emotional support animals) to support consistent application
- Strengthen alignment with emerging expectations under the Renters' Rights Act
- Clarify residents' responsibilities and the Corporation's approach to managing nuisance

These amendments ensure the policy is clearer, more consistent and legally robust, while maintaining the existing balance between supporting responsible pet ownership and protecting the amenity of estates.

Table A: Proposed Policy changes

Area	Current Version (v.3 - Nov 24)	Proposed Revision	Nature of Change
Reason for update	Routine review following consultation	Further review undertaken to improve clarity and ensure Equality Act compliance	Clarification / compliance
Evidence base	Based on resident consultation (2024)	Now also explicitly informed by complaints analysis, staff consultation, and Legal review	Strengthened governance / audit trail

Clarity and structure	Existing wording and structure	Improved clarity, structure and accessibility of policy including addition of a Contents page	Editorial improvement
Definitions	Basic references to pet types	Clearer definitions introduced (assistance dogs and emotional support animals)	Clarification / consistency
Equality considerations	Assistance dogs referenced	Stronger alignment with Equality Act 2010 and clearer recognition of assistance dogs / individual circumstances	Legal strengthening
Legislative alignment	No explicit reference to emerging legislation	Alignment strengthened with Renters' Rights expectations	Future-proofing
Residents' responsibilities	Set out in policy	Further clarified, including approach to nuisance management	Clarification
Overall position	Balanced approach to pets and estate amenity	Same approach retained but now clearer, more consistent and legally robust	Reinforcement (no policy shift)

Appendix 1: Pets Policy Revisions

City of London Corporation
Department of Community & Children's Services

Housing Service

Pets Policy

Approved by:	***Housing Management & Almshouses Sub-Committee***
Original Approval Dates:	***May 2017 (v.1); January 2021 (v.2) November 2024 (v.3)***
Review Date:	***November 2027***
Re-Approval Date	***1 July 2026 (v.4 – this version)***
Next Review Date	***November 2027***

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1. Purpose and scope

1.1 This policy sets out our approach to residents keeping pets in their homes and reinforces the provisions in tenancy and lease agreements.

1.2 This policy applies to residents of all tenures living on estates managed by the Housing Division, including Secure tenants, leaseholders and sub-tenants of leaseholders. Some differences apply to sheltered housing, and these are explained in the policy.

1.3 This policy applies to the almshouses administered by City Corporation in their capacity as trustee of the relevant charities (the City of London Almshouses and Gresham Almshouses).

2. Policy aims and objectives

2.1 Our aim is to encourage responsible pet ownership and to prevent residents from allowing their pets to cause a nuisance and annoyance to others. We will achieve this aim by:

- Limiting pet ownership according to the type of property occupied
- Having a clear and simple process for residents to make a request to keep a pet
- Communicating information on responsible pet ownership
- Acting when residents do not comply with their tenancy or lease conditions

3. Service standards

3.1 When we deal with residents' requests to keep pets (if permission is needed) we will:

- Respond to requests within 10 working days
- Where permission is granted, explain the pet owner's responsibilities
- Where permission is refused, explain the reasons
- Take prompt action where pets cause nuisance or annoyance

4. Legal and regulatory obligations

4.1 This policy will help us to comply with the following regulatory requirements:

- Tenancy standard – we must have clear and accessible policies which outline our approach to the management of tenancies
- Neighbourhood and community standards – we must keep the neighbourhood and communal areas associated with our homes clean and safe.

4.2 There are no direct legal obligations arising from this policy. However, this policy will ensure that we act when residents do not comply with their legal obligations as pet owners.

5.0 Our approach

We want all residents to enjoy living in their homes and we recognise the benefits of responsible pet ownership. However, we must ensure appropriate controls are in place to prevent nuisance or harm to others and to animals. Residents who wish to keep a pet must ask our permission first, providing details of the pets that they wish to keep.

In exceptional circumstances, we may consider variations to this policy. Any variation will depend upon an individual's circumstances. Our decision and reasons for the decision will be provided in writing to the relevant parties.

5.1 Permitted pets

Permission

Residents do not need to seek prior permission for pets permitted under this policy.

If a resident wants to ask for us to make an exception to the policy in their case, they must apply in writing via their Estate Office, explaining why an exception should apply in their case. They may be asked to provide appropriate evidence to support their application.

General needs rented and leasehold properties

In line with our tenancy and lease conditions, we will only allow residents to keep pets that we regard as suitable, and in such numbers that we consider reasonable.

Cats – Up to two indoor cats or ‘house cats’ are permitted per property. Cats must not be allowed to roam in any indoor or outdoor communal areas, or to cause a nuisance.

Dogs – The following rules apply to all residents:

- Residents who live in a flat or a maisonette are not allowed to keep a dog unless it is an assistance or support dog.

- Residents living in a house with a private enclosed garden are permitted to keep one dog, provided that the breed, size and temperament of the dog are suitable.

We will not refuse your request unreasonably and we ask that you provide us with your request in writing with information supporting your request including medical information. When considering who is entitled to an assistance or support dog, we will consider whether you are considered disabled and require an assistance or support dog. We will send you our decision in writing within 28 days.

Please note that emotional support dogs are not the same as assistance dogs. Emotional support dogs are not defined in the Equality Act 2010. However, we can make reasonable adjustments for disabled people depending on the specific facts and circumstances in each case.

For the purpose of this policy, definitions are as follows:

- Assistance dogs are:
  - a dog which has been trained to guide a blind person;
  - a dog which has been trained to assist a deaf person;
  - a dog which has been trained by a prescribed charity to assist a disabled person who has a
  - disability that consists of epilepsy or otherwise affects the person's mobility, manual dexterity,
  - physical co-ordination or ability to lift, carry or otherwise move everyday objects;
  - a dog of a prescribed category which has been trained to assist a disabled person who has
  - a disability (other than one falling within paragraph (c)) of a prescribed kind.

- Emotional support dogs are interpreted as:
  - Emotional Support dogs that provide emotional support to a person with a

mental health or psychiatric disability (such as a serious mental health condition).

Other animals - Small domestic pets such as hamsters, caged birds and fish are permitted to be kept. Exotic or wild animals are not permitted to be kept.

Sheltered Housing and Almshouses

Cats and dogs are not permitted in our sheltered housing, which includes the City of London Almshouses and Gresham Almshouses for the purposes of this policy. This does not include assistance or support dogs.

We will not refuse your request unreasonably and we ask that you provide us with your request in writing with information supporting your request including medical information. When considering who is entitled to an assistance or support dog, we will consider whether you are considered disabled and require an assistance or support dog. We will send you our decision in writing within 28 days.

Please note that emotional support dogs are not the same as assistance dogs. Emotional support dogs are not defined in the Equality Act 2010. However, we can make reasonable adjustments for disabled people depending on the specific facts and circumstances in each case.

5.2 Resident responsibilities

Any permission to keep a pet is subject to the following conditions and responsibilities:

- Residents must ensure the health and welfare of their pets at all times
- Residents must comply with all legal obligations relating to the ownership and control of their pets and not keep any breed banned by law
- Residents are also responsible for the behaviour and control of any animal they own including those belonging to visitors. They must not allow their pets to cause a nuisance or annoyance to others or cause damage to property
- All assistance dogs must not be exercised on City of London estates and communal areas and must not be allowed to cause a nuisance to others.
- All assistance dogs must be kept on a lead at all times when being taken through a City of London estate and must not be tethered to any land owned by us.
- Residents must not keep any pets on balconies or communal walkways.
- Residents must not undertake the following activities from their home:

- Breeding of animals.
- Sale of animals.
- Hoarding of animals – this involves keeping an excessive number of animals as pets without having the ability to properly house or care for them.

5.3 Dealing with nuisance from pets

We will take appropriate action where residents do not comply with these conditions or their obligations and responsibilities as pet owners.

Pet nuisance includes but is not limited to the following: allowing pets to roam unattended; fouling; loud noise nuisance; smells; damage caused by animals; injuries caused by animals; aggressive animals.

We aim to resolve problems informally and by agreement. However, where the problem is serious or persistent, we may take legal action to enforce our tenancy or lease conditions and remove the pet or animal from the property.

6. Responsibilities, monitoring and performance

6.1 Overall responsibility for this policy and its implementation rests with the Head of Housing Management. The Head of Housing Management will ensure that staff receive the appropriate training and support to achieve the aims of this policy. Where needed we may establish appropriate operational procedures.

6.2 Monitoring the implementation of this policy and our performance in dealing with issues relating to pet ownership will be the responsibility of senior management within the Housing Division.

6.3 The City Corporation in its capacity as trustee of the City of London Almshouses Trust has oversight of the application of the policy to the Charity, through the Housing Management and Almshouses Sub-Committee.

7. Associated documents

- Anti-Social Behaviour Policy
- Tenancy Agreement
- Tenancy Policy
- Estate Management Policy
- Safeguarding Policy
- Reasonable Adjustments Policy
- Unreasonable Behaviour Policy
- Complaints Handling Policy

8. Document Management

Policy title	Pets Policy
Date created	May 2017 (v.1) January 2021 (v.2) November 2024 (v.3) July 2026 (v.4 – this version)
Policy owner	Head of Housing Management
Authorised by	Housing Management and Almshouses Sub- Committee
Date authorised	1 July 2026
Review period	3 years
Date of next review	November 2027

Consultation and assessment	
Customer consultation	Residents have been consulted on this policy. Any substantive changes to this policy will result in further consultation.
Equality Impact Assessment	This Policy has been subject to a full Equalities Analysis. We permit assistance dogs in line with disability requirements. The policy allows for the needs of individual residents to be considered.
Data Protection Impact Assessment	Not required. Minimal risk of data breaches. Use of personal data covered by our privacy statement.

Document review history			
Version	**Date reviewed**	**Date approved**	**Key changes**
1.0	N/A	February 2017	Original document
2.0	November 2020	January 2021	Routine policy review. Document format amended and updated but the policy approach is unchanged.

3.0	July-November 2024	28 November 2024	Routine policy review. Resident consultation completed. No material amendments.
4.0	July 2026	1 July 2026	No material amendments. Wording clarified to support compliance with the Equality Act 2010.

Recommendation

Members are asked to approve the proposed revisions to the Pets Policy.

For Information and Discussion

1. Housing Services Recruitment Update

Need for Extra Staffing Resources in Housing

The results of the Regulator for Social Housing Regulator and the results of the Pennington Compliance Review and previous findings from the Tenant Satisfaction Measures (TSMs) surveys confirmed the need for extra resources outlined in the Housing Strategy action plan.
The key areas identified were:

- Health and Fire Safety
- Repairs, Maintenance and Compliance
- Estate Services
- Resident Engagement
- Housing Management
- Major Works

Health and Fire Safety

CCS did not have a dedicated resource covering these areas. The housing team had one advisor which was insufficient to meet health and safety requirements for housing let alone the requirements coming from recent legislation such as the Building Safety Act 2022. In response an interim Head of Health and Fire Safety was employed to develop a team structure for this area of work covering DCCS and Housing (social housing and Barbican housing). The new structure has been approved by Committee and the workforce panel and recruitment is due to commence.

Repairs, Maintenance and Compliance

The need for stronger contract management was identified, in response contract managers covering the repairs contract and compliance areas were brought in on fixed term contracts. These posts have now been made permanent and will be recruited to.

Estate Services

Tenant satisfaction as measured by TSMs has declined in recent years. This is in part due to the need for estate services staff to become part of the first line of compliance. This has led to a dilution of the focus on the more aesthetic elements of the role, essential for residents' enjoyment of their homes. Extra posts have been agreed to provide resource for the compliance element of the role to allow for a greater focus on cleaning and other external works. These roles are going through the workforce planning process.

Resident Engagement

This area of work is rightly expanding and more internal work is required to support it.

Housing Management

Estate Office

The estate office model is not working as it should, partly because it is a thinly spread resource, which is not robust enough when annual leave and sickness etc occur. There is a need for 2 peripatetic resident services officers to be employed to plug gaps, work on projects and help where demand is high on an ad hoc basis.

Golden Lane Estate, Black Raven Court and Major Works

More intensive work is needed on our larger estates. Especially those where major works and new build is planned. To this end the need for a senior person based in the office at the Golden Lane Estate, to focus on Golden Lane, Black raven Court and Major Works has been identified. Recruitment to this post is progressing initially on a temporary basis.

MHCLG Capitalisation Directive Bid
The new posts identified and detailed above formed part of our request to MHCLG for a capitalisation directive to fund them. Funding was also sought for compliance including fire safety repairs.

Senior Management Team Recruitment
There are two vacancies on the senior management team, the posts are being covered by interim staff on fixed term contracts. The permanent recruitment process for the posts has commenced. Interviews for the Head of Housing Management role are due to take place in early July, and the Head of Health and Fire Safety will be advertised by the end of June.

An organogram showing the revised structure is included below for information.

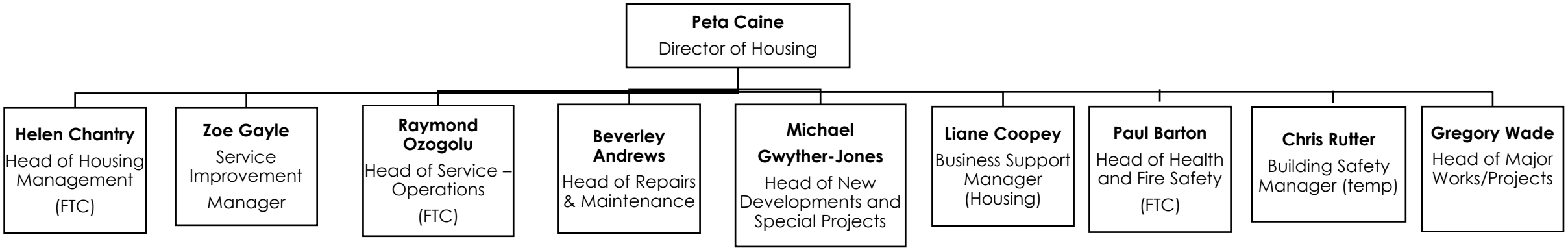
Recommendation

Committee is asked to note the progress being made on recruiting to the new posts and the detail contained in the organogram

Community and Children's Services

HOUSING SERVICES

Senior Management Team

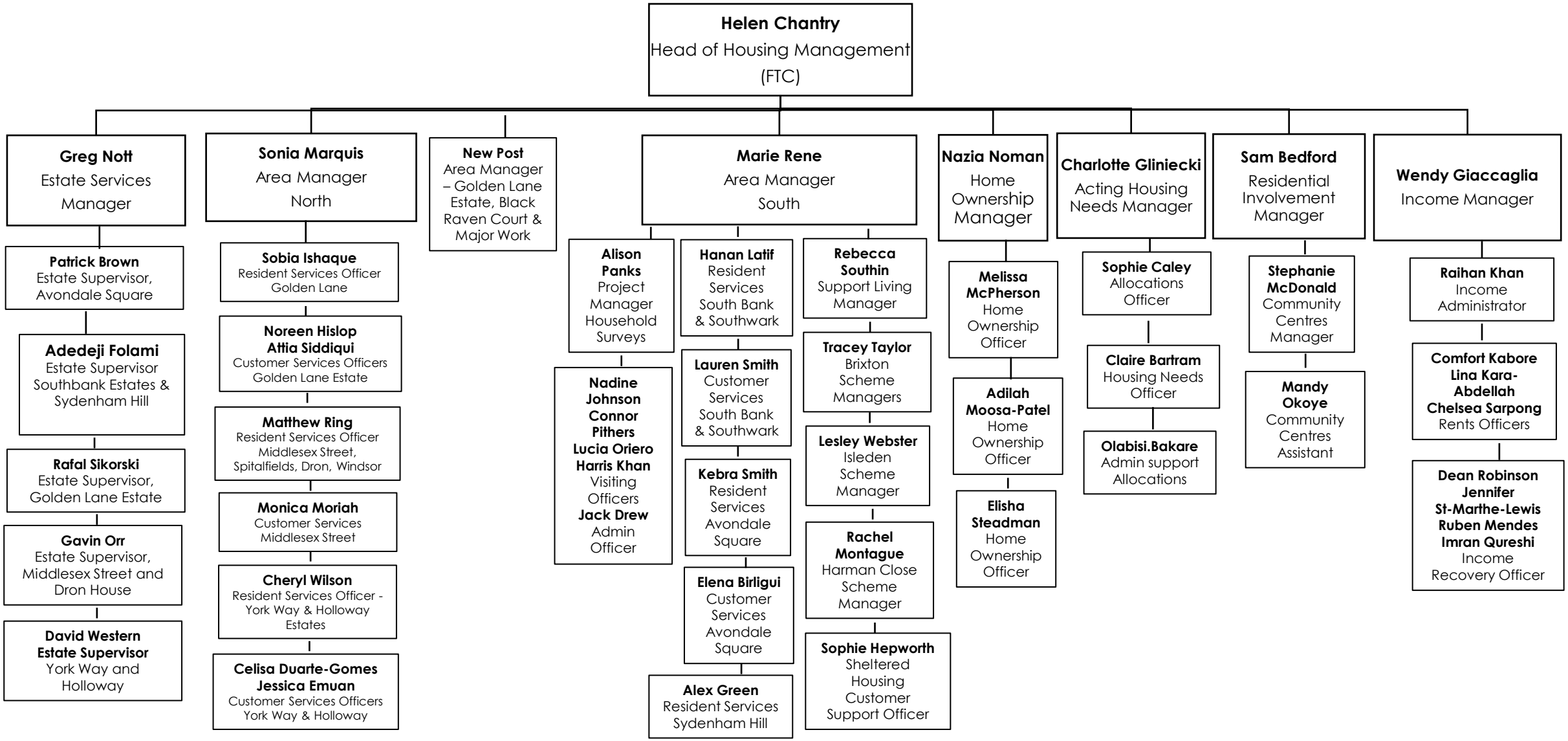


Last Updated
16/06/26

Community & Children's Services

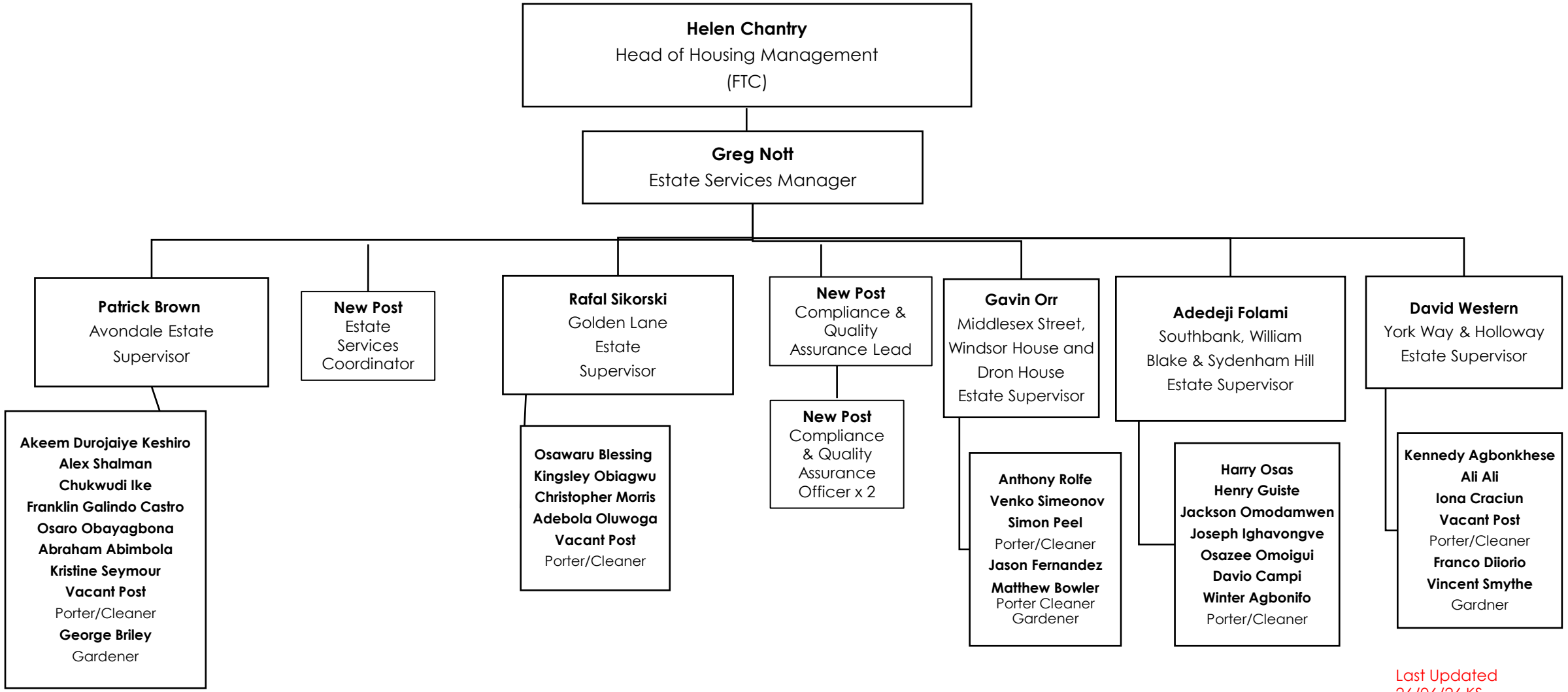
Last Updated
16/06/26 KS

Housing Management



Community & Children's Services

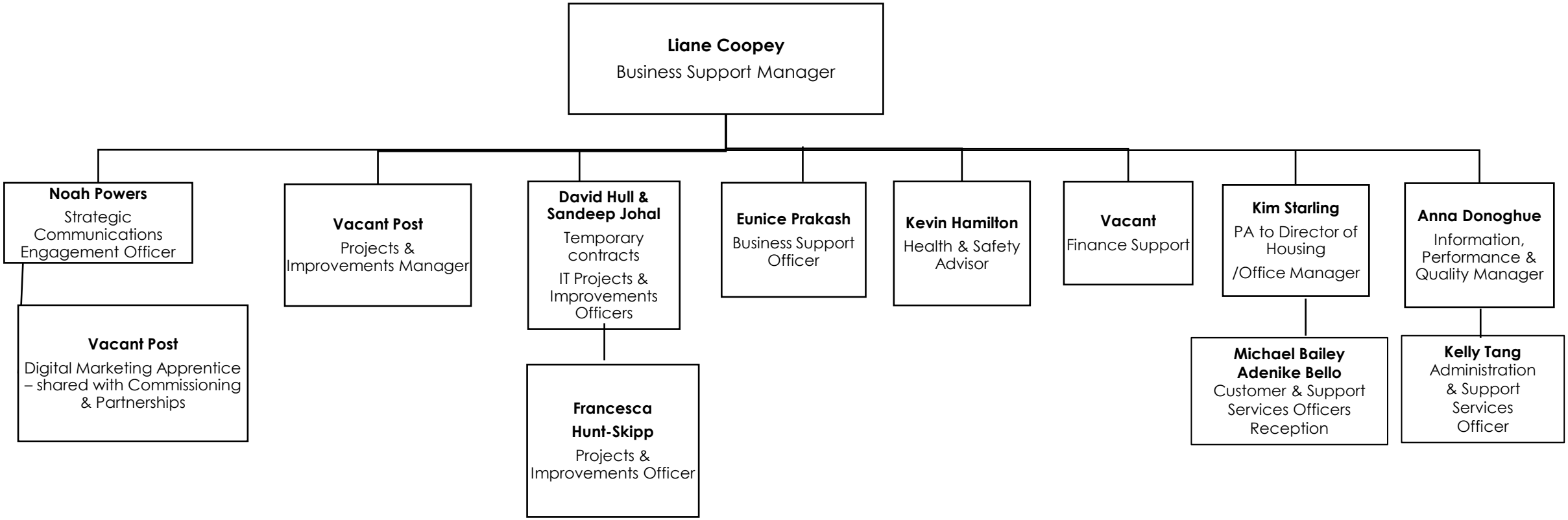
Estate Services - Housing



Last Updated
26/06/26 KS

Community & Children's Services

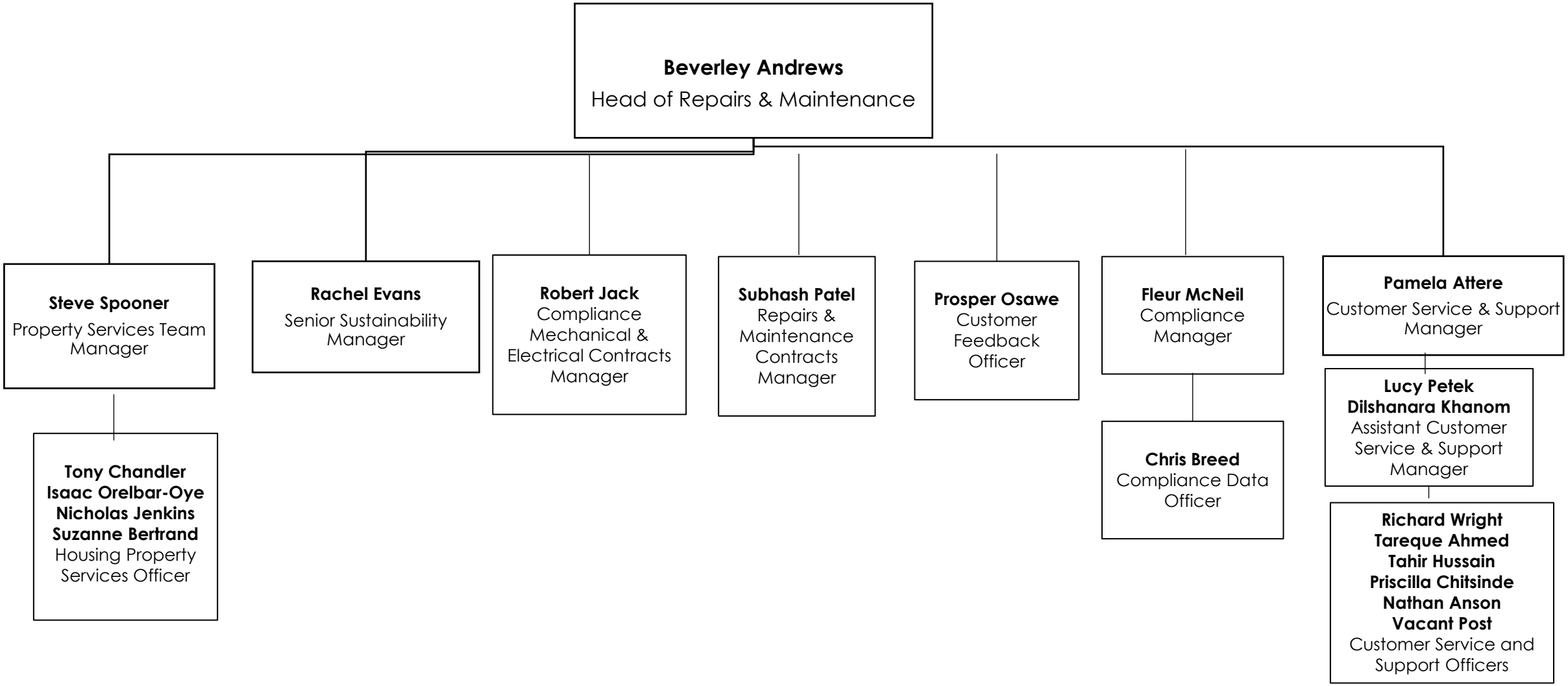
Business Support - Housing



Last Updated
26/06/26 KS

Community & Children's Services

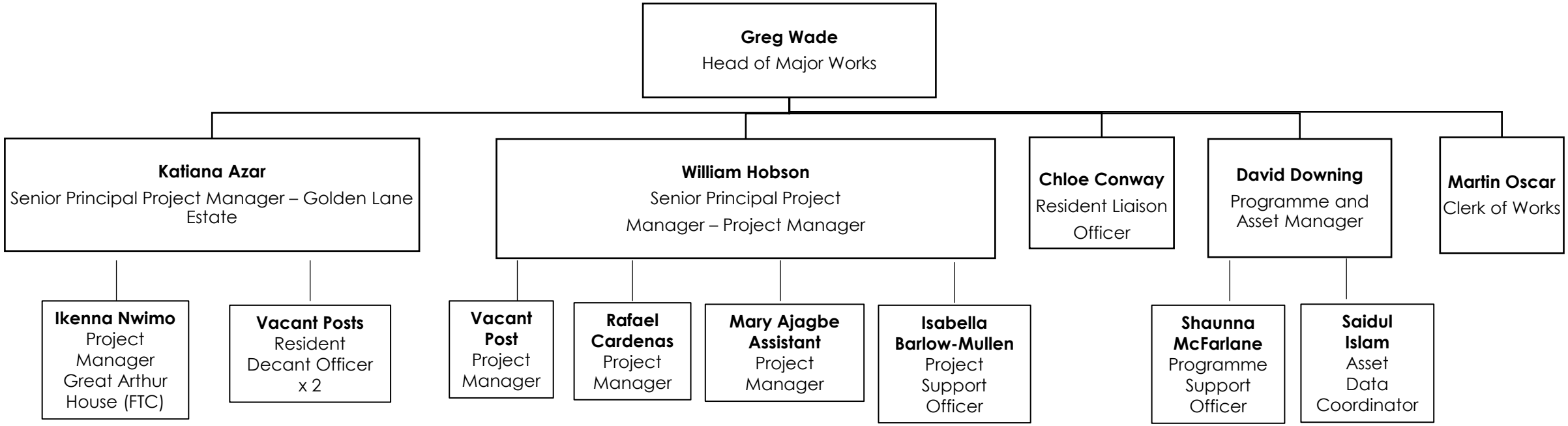
Repairs and Maintenance - Housing



Last Updated
26/06/26 KS

Community & Children's Services

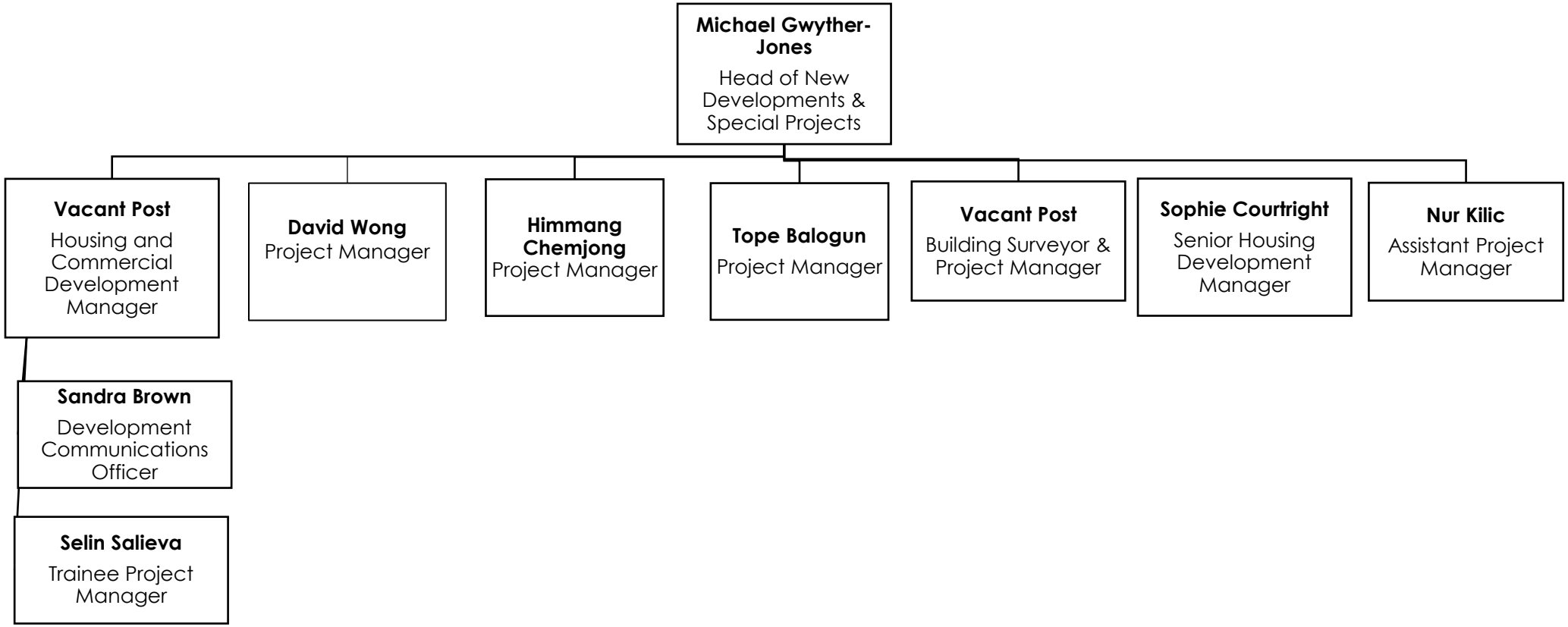
Major Works/Projects - Housing



Last Updated
26/06/26 KS

Community & Children's Services

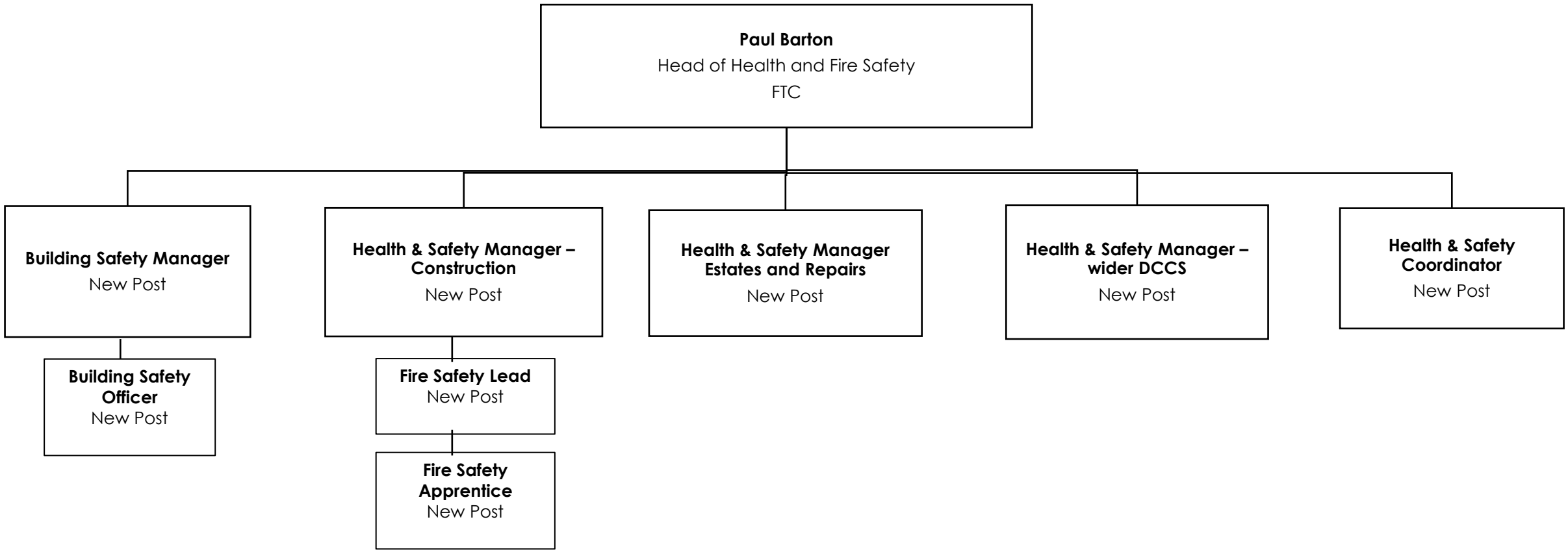
New Developments/Special Projects - Housing



Last Updated
26/06/26 KS

Community and Children's Services

Health and Fire Safety



2.Local Lettings Update – Sydenham and Black Raven Court

Overview

This briefing provides an update on the progress of lettings across the Local Lettings Policy (LLP) schemes at Black Raven Court (Islington) and Sydenham Hill (Lewisham). It sets out current uptake levels, explains the position on properties currently held, and responds to questions raised by Members regarding borough allocation and policy flexibility.

Overall, lettings are progressing, but are constrained by cross-borough nomination processes, and applicants' affordability and location preferences. Uptake is strongest where applicants remain within their existing borough, with lower acceptance rates where relocation is required.

LB Lewisham is proving easier to deal with in this regards than LB Islington.

Current City of London Housing Register (by bedroom need)

Bed size Need	Number of Applicants
Studio	439
1 Bed	146
2 Bed	282
3 Bed	146
4+ Bed	40

Total: 1,091 (some applicants' bedroom need is not yet determined)

Uptake Across Boroughs

Scheme / Borough	No. of Homes	Under Offer / Let
Black Raven Court - City of London	33 (11 non-lettable)	22
Black Raven Court - Islington	33 (2 non-lettable)	17
Black Raven Court Total	66 (13 non-lettable)	39
Sydenham - City of London	55	33
Sydenham - Lewisham	55	55
Sydenham Total	110	88

Former Mais House residents (returning to Sydenham):

- 27 residents offered
- 1 accepted
- 10 no response
- 16 not proceeding (including 3 deceased, 12 not interested, 1 moved to a care home)

Properties Held at Black Raven Court

A number of properties are currently held back due to required remedial works and are not available for immediate allocation.

Property Type	Total Held	City of London	Islington	Reason
1-bed	11	9	2	Remedial works
2-bed	2	1	1	Remedial works
T**otal**	13	10	3	—

The first two held apartments are expected to be available from March 2027, with a further two released every two months until all units are available by November 2027. Apartments will be released from top to bottom.
The programme remains subject to finalisation, including Building Safety Regulator approval, which is outside the City Corporation's control.

Barriers to Uptake
Analysis of refusals highlights the following key challenges:

- **Location:** Applicants declining Sydenham properties due to distance from existing homes, employment, or schools. This is particularly evident for 2-bed homes, where refusals have been linked to location even in cases of overcrowding.
- **Borough preference:** Strong preference among Golden Lane residents to remain within the City of London rather than relocate to Islington. There is also a preference to retain properties where parking is available.
- **Affordability:** Concerns where downsizing results in higher rent, despite downsizing payments offer (£2,000 for the first bedroom and £1,000 for each additional bedroom).
- **Pets Policy:** A number of Lewisham nominees for Sydenham have dogs, which has affected eligibility in line with policy requirements.
- **Human behaviour**: The team have had to accommodate the following-
  applicants who bid and do not attend viewings
  applicants who accept and later refuse properties
- **LB Islington's Allocation Policy** states that "applicants who fail to bid for more than twelve months may be removed from the Housing Register. These applicants will be required to reapply if they consider they still have a housing need. Any decision to remove an applicant from the housing register is subject to review" There is no defined limit (The CoL's limit is 3).

Operational Considerations
Lettings are also affected by operational and process factors:

- The Housing Needs Team manages matching for Islington nominations, adding complexity
- All applications require eligibility checks, documentation review, and fraud screening
- Approximately 30 applications are received each month
- Staffing capacity and long term sickness is impacting pace

For context, 62 lets were completed in 2025/26. Current delivery includes approximately 176 new lets alongside ongoing lettings and internal moves.
These factors contribute to delays between property availability and tenancy sign-up, although work is ongoing to streamline processes.

Policy Flexibility and Governance
Members asked whether the LLP is sufficiently flexible to support uptake.
Current position:

- No formal flexibility has been applied within the LLP
- We reverted to the main allocations policy on 15 June 2026.

We identified that some LLP features constrained uptake, including:

- Borough allocation restrictions
- Property type mismatches

- Reliance on external nomination processes

Conclusion

The LLP is supporting delivery of new homes across multiple boroughs, with steady progress to date. However, uptake continues to be influenced by applicant preferences, property mix, limitations of the local lettings plan, and estate office staff capacity. Officers will continue to monitor performance and consider whether targeted adjustments are required to support improved uptake. A meeting will be arranged with Islington colleagues to strengthen the level and quality of nominations received in advance of the York Way scheme, which also sits within the London Borough of Islington. Any proposed changes will be brought forward through the appropriate governance process.

Recommendation

Members are asked to note the content of the Local Lettings Update – Sydenham and Black Raven Court above.

3. Access to Homes Policy – Update

- The Housing Service has developed a new Access Policy to strengthen our approach to gaining access to residents' homes in order to meet our legal, regulatory and service obligations.
- The policy is required to ensure a consistent, fair and legally compliant approach to gaining access to residents' homes, particularly in relation to statutory compliance activities such as gas, electrical and fire safety, as well as repairs, inspections and emergency situations such as leaks. It also provides a clear framework for escalation where access is not provided and supports robust record keeping for compliance and complaints purposes.
- Importantly, the policy also seeks to ensure that access arrangements and procedures are clear and responsive to residents' needs, promoting a positive and cooperative approach. This includes the requirement to provide residents with clear information on why access is required and using a range of communication methods to make contact and support engagement.
- Development of the policy has been informed by internal consultation with operational housing teams and Legal Services, to ensure the approach is practical, proportionate and supports frontline delivery. Feedback has helped refine areas such as escalation processes, timelines and the balance between enforcement and resident engagement.
- At the time of the Committee meeting on 1 July, the draft policy will be out for resident consultation via Commonplace, inviting tenants and leaseholders to provide feedback on how access arrangements are communicated, managed and experienced. The consultation has been designed to ensure the policy is clear, fair and resident-focused, and that it appropriately balances safety, compliance and residents' rights.
- Following the close of the consultation, all feedback will be reviewed and used to inform the final version of the policy. A further report will be brought back to Members at the September HMASC meeting seeking formal approval, alongside a summary of resident feedback and any proposed amendments.

Appendix 1 – Draft Access to Homes Policy



City of London Corporation

Department of Community & Children's Services

Housing Service

Approved by:	***Housing Management & Almshouses Sub-Committee***
Original Approval Date:	**Xx xxxx 2026 (v.1 – this version)**
Review Date:	**xx 2029**
Tenant Consultation Date:	**June 2026**

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1. Purpose

1.1 This policy sets out the City of London Corporation's approach to gaining access to residents' homes to meet legal, regulatory and service delivery obligations.

1.2 It ensures:

- Resident safety and building safety obligations are met
- A consistent, fair and legally compliant approach to access
- Clear escalation where access is not provided
- Robust evidence for regulatory, legal and complaints purposes

2. Scope

2.1 This policy applies to tenanted residential properties managed by the City of London Corporation. Leaseholder arrangements are excluded from this policy and will be addressed separately due to differing legal rights of access

2.2 It covers access required for:

- Statutory compliance (including. gas, electrical, water safety, fire safety, asbestos and damp & mould checks)
- Planned maintenance and major works
- Repairs (including damp & mould management, leak management and follow-on works)
- Property condition inspections (e.g. structural checks)
- Welfare checks
- Investigation of tenancy compliance and breaches
- Emergency situations
- Access to shared building services located within properties

3. Definitions

3.1 Definitions referred throughout the policy are listed as below:

- **Routine Access** - Planned, non-urgent visits
- **Compliance Access** - Access required to meet statutory landlord obligations
- **Urgent Access** - Required to prevent damage or allow other works to proceed
- **Emergency Access** - Required where there is immediate risk to the safety of residents/others or the property
- **No Access** - Where reasonable attempts to gain entry have been unsuccessful

4. Policy Statement

4.1 The City will:

- Take all reasonable steps to obtain access to a property within agreed timelines
- Ensure residents are given clear notice and opportunity to engage
- Apply a consistent minimum standard of contact attempts
- Act proportionately but firmly where access is required to meet obligations
- Record all actions taken to demonstrate compliance and accountability

4.2 Access to carry out statutory obligations is a condition of the tenancy agreement, and residents are expected to cooperate with reasonable requests and adhere to the tenancy conditions.

5. Our Commitments to Resident

The City recognises that accessing homes requires cooperation and trust. We are committed to working with residents in a fair, transparent and respectful way.

When seeking access to your home, we will:

5.1 Provide Clear Information

- Explain the reason access is required, including any legal or safety obligations
- Give reasonable notice and provide clear details of the appointment, including date, time and expected duration
- Explain the importance of access and any consequences where access is not provided. This may include recharging residents for refused access, as well as any associated damage or administrative costs.

5.2 Give Reasonable Notice and Flexibility

- Provide sufficient notice for planned appointments where possible
- Offer alternative appointments where available
- Take a flexible and proportionate approach in exceptional circumstances (e.g. vulnerability or health issues)

5.3 Make it Easy to Contact Us

- Provide clear contact details for residents to:
    - Rearrange appointments
    - Ask questions
    - Raise concerns
- Ensure access to multiple contact channels (e.g. phone, email, estate office)

5.4 Respect You and Your Home

- Ensure staff and contractors:
    - Attend within agreed appointment times
    - Carry and show valid identification
    - Act professionally and respectfully

- Minimise disruption wherever possible

5.5 Take a Fair and Proportionate Approach

- Consider individual circumstances, including:
  - Vulnerability
  - Language barriers
  - Support needs
- Provide reasonable adjustments, including translation support where required

5.6 Keep Accurate Records

- Maintain records of appointments, contact attempts and outcomes
- Use this information to provide transparency and improve services

5.7 Work with You to Resolve Issues

- Seek to resolve access issues without escalation wherever possible
- Use local knowledge (e.g. estate staff and RSOs) to support engagement
- Keep residents informed where escalation is required

6. Types of Access

6.1 Routine Access - Planned, non-urgent access such as:
- Inspections
- Planned works
- Surveys

6.2 Compliance Access - Access required to meet statutory landlord obligations, including damp & mould, gas, electrical, fire and water safety. Failure to gain access in these cases represents a significant compliance risk and will be escalated accordingly.

6.3 Urgent / Priority Access - Access required to:
- Prevent damage to property (e.g. leaks and other safety issues)
- Enable follow-on work affecting the property or other properties

6.4 Emergency Access - Access required where there is:
- Immediate risk to life, property or building safety
- Situations such as fire, flood, gas leak, leaks affecting electrical supply etc. or welfare concerns

If emergency access is required, access must be allowed immediately. If access is not allowed immediately, we reserve the right to enter the property, and force entry, at short notice.

7. Approach to Gaining Access

7.1 Minimum Attempts

- A minimum of three attempts must be made to gain access before escalation
- Attempts must include written contact and should include multiple channels (e.g. phone, email, visit)
- The approach must be actively managed and tracked throughout

7.2 Contact Methods

The following methods should be used (where available):

- Letters (hand delivered and photographed)
- Telephone (leaving a voicemail if no response)
- Email
- SMS
- Door knocking / estate-based engagement

All attempts must be fully recorded, including dates, method of contact and outcomes.

7.3 Timelines for Contact Attempts – Non Emergencies

- First attempt: Response requested within 3 working days
- Second attempt: If no response, follow-up contact issued with a further 3 working day response period
- Third attempt: Final contact issued with a further 3 working day response period

Progress must be closely monitored, with prompt escalation if no response is received after the third attempt.

7.4 Evidence Requirements

- Contractors must evidence access attempts (e.g. dated letters, calling cards, photographs)
- Records must be maintained on CoL corporate systems (e.g. Civica) to ensure a full audit trail.

8. Escalation Process

8.1 Post-Attempt Escalation

Following unsuccessful access attempts:

- Cases must be escalated to Housing Management
- Relevant teams (Area Managers, RSOs, Tenancy Support) must be informed to support access

8.2 Internal Coordination

- Early involvement of Resident Services Officers (RSOs) and Tenancy Support Officers (TSOs) is expected for known hard -to-access households
- Local knowledge should be used to support engagement and resolution

8.3 Legal Escalation

Where access cannot be secured:

- Cases may be escalated for legal enforcement including a Notice of Seeking Possession being served for breach of tenancy conditions
- Sufficient evidence of attempts must be available prior to referral

9. Emergency Access and Forced Entry

9.1 Principles

Entry within 24 hours and without consent will:

- Only occur as a last resort
- Be based on a clear and recorded risk assessment
- Be proportionate to the level of risk

9.2 Authorisation

Forced entry must be agreed by an Area Manager or Senior Management Team member with evidence of access attempts and supported by legal services.

9.3 Process

- All reasonable attempts to contact the resident must be made
- Emergency services may be involved where appropriate
- A housing representative must be present

9.4 After Entry

- Home must be secured
- A record of actions taken must be left at the property
- All decisions and rationale must be recorded on a corporate system such as Civica.

10. Resident Responsibilities

10.1 Residents are expected to:

- Provide access for appointments
- Respond to communication
- Inform the City if they cannot attend
- Facilitate access where required under the tenancy agreement

11. Data and Record Management

11.1 All records must be accurate, complete and auditable. Records must include:

- Contact attempts
- Dates and methods
- Outcomes and decisions

12. Non-Compliance and Escalation

12.1 Failure to provide access for compliance activities will be treated as significant non-compliance and escalated appropriately.

13. Related Documents

- Access to Homes SOP / Workflow
- Tenancy Agreement
- Repairs & Maintenance Policy
- Compliance Policies (Gas, Electrical, Fire, Damp & Mould, Asbestos, Water, etc.)
- Vulnerability Policy
- Safeguarding Policy

14. Equalities

14.1 This Policy has been subject to a full Equalities Analysis and will be implemented in accordance with our responsibilities and duties under relevant legislation, including the Equalities Act 2010.

15. Data Protection

15.1 We will comply with our obligations under relevant data protection legislation and regulations. We will process and store personal information securely.

16. Exceptions

16.1 We may make an exception to the approach outlined in this policy if the circumstances require it and it is reasonable to do so. Our reasoning can be provided to the affected parties on request.

Recommendations

Members are asked to note the content of the Draft Access to Homes Policy report.

Members are asked to note that the draft policy is out to consultation and that the revised policy will be returned to committee in September 2026.

4. Asset Management Strategy Refresh Progress

Asset Management Strategy – Refresh Progress

Members are reminded that the Housing Asset Management Strategy (AMS) 2025 was approved at CCS 17 September 2025 with a commitment to refresh it following completion of the Stock Condition Survey (SCS) and improved asset data.

Progress to date

Good progress has been made in strengthening the evidence base and delivery framework underpinning the Strategy. The Stock Condition Survey (SCS) programme is progressing well, with 85% of homes surveyed as of 4 June 2026 and 86% of these quality assured. Data migration, validation and full analysis are planned in 2026/27, which will provide a robust baseline of stock condition, compliance and risk to inform long-term investment planning.

In parallel, the Major Works programme is being strengthened through improved planning, governance and resourcing, with delivery increasingly aligned to compliance requirements, emerging SCS data and estate-level priorities. Key risks relating to funding, inflation and delivery capacity continue to be actively managed through established governance arrangements.

Governance and assurance arrangements continue to mature, with regular reporting to Boards and HMASC strengthening oversight of asset risk, compliance and delivery. The AMS remains the overarching framework for coordinating investment, compliance and service improvement.

Evidence informing the refresh

The refresh will be informed by a strengthened evidence base, including the SCS as the core dataset, alongside emerging household and resident survey insights to better understand resident needs and priorities.

The Strategy will also align with wider corporate priorities, including the Climate Action Strategy, ensuring asset investment supports retrofit, energy efficiency and delivery of net zero carbon objectives, alongside Housing Strategy delivery plans and wider climate commitments. Compliance and regulatory requirements will continue to shape investment priorities, maintaining a strong focus on safety and consumer standards.

This will be supported by updated HRA funding assumptions, reflecting cost pressures and financial risks, alongside improvements in service capacity, including a strengthened Major Works delivery model.

Approach to refresh

The refresh will move the strategy to a fully evidence-based Asset Management Strategy, supported by a data-led long-term investment plan aligned to SCS outputs and integrated with the Major Works programme and corporate strategies.

A clear prioritisation framework will balance compliance and safety, asset condition, resident need and financial sustainability, in line with the Housing Strategy commitment to adopt an updated AMS in 2026/27.

Next steps

Work will now focus on completing SCS validation and analysis, continuing resident insight activity, and finalising an integrated investment plan. A refreshed Asset Management Strategy will be presented to Members for approval later in 2026/27

Recommendations

Members are asked to note the content of the Asset Management Strategy Refresh Progress.

Members are asked to note that the Asset Management Strategy Refresh will be presented to committee later this year.

5. Housing Design Guide Update – For New Homes

The Housing Design Guide produced in 2020 has been updated for 2025/6. The new version captures changes made in the last five years to Building Regulations including fire, overheating, energy and building safety. We have transitioned from a requirement for Home Quality Mark Accreditation to the new Building Research Establishment Environmental Assessment Methodology (BREEAM) Residential V6.1 targets to ensure sustainability is embedded across all new homes.

It also includes employer guidance on the new P3 framework, our requirements for Building Management Systems and captures lessons learnt from the completed projects at Black Raven Court and Sydenham Hill and handover processes.

Recommendation
Members are asked to note the brief update on progress made on the Housing Design Guide.

6. Voids Process and Improvements being made

Overview
Performance within the voids process has been impacted by operational inefficiencies, process gaps, and data quality issues, alongside increasing system pressures. These include the impact of new build homes entering the voids and lettings system and current contractor performance constraints. Service continuity has been maintained through the use of contractors familiar with existing voids processes; however, this has highlighted the need to strengthen capacity and flexibility. There is also a clear requirement to improve the service in preparation for future demand arising handover of the York Way development.
These current and historic factors have contributed to elevated average re-let times, inconsistencies in performance reporting, and reduced confidence in management information. A structured improvement programme is now in place to address these issues and strengthen the effectiveness, consistency, and transparency of the end-to-end voids process.

Key Issues Identified
Complexity of the End-to-End Process
The voids process spans Allocations, Resident Services, Property Services, and contractors. This multi-stage approach has increased the risk of delays at handover

points, duplication of activity, and unclear accountability. Historically, ownership of the full process has lacked clarity, resulting in fragmented oversight.

Delays in Lettable Works
Ongoing inefficiencies in the lettable works stage continue to impact delivery timescales. Key drivers include delays in resolving gas and electricity meter debts and difficulties in reconnecting utilities, preventing contractors from progressing works.

Contractor Coordination and Work Allocation
Inconsistencies in how void works are issued, managed, and monitored, alongside current contractor performance constraints, have contributed to inefficiencies in works sequencing, mobilisation, and overall delivery. While service continuity has been maintained through contractors familiar with voids processes, these arrangements have limited flexibility and responsiveness at peak demand. Additional pressures arising from new build homes entering the system have further highlighted the need for improved contractor capacity and coordination.

High Re-let Times
Average key-to-key re-let times remain above target for standard voids. Performance has been further impacted by long-term voids linked to Major Works programmes and legacy properties remaining within the system, distorting performance averages.

Data Quality and Reporting
Reporting inconsistencies have affected data accuracy, including variations in reported re-let times and inclusion of long-term voids within standard measures. Continued reliance on manual tracking and variances between manual and system data have limited effective performance monitoring and decision-making.

Actions Taken
Voids Workshops and Governance
A programme of cross-service voids workshops has been established to map the end-to-end process, identify root causes of delay, and develop and monitor a formal improvement action plan.

Adoption of Housing Quality Network (HQN) Empty Homes Toolkit
The HQN toolkit has been implemented to provide a recognised sector benchmark and structured framework to identify gaps and prioritise improvements.

Operational Improvements (Pre-Void and Delivery)
Property Services has introduced targeted improvements, including onboarding two voids contractors, implementing “Energy Angels” to resolve utility and billing issues, and assigning a dedicated Property Services Officer. These measures are expected to improve coordination, strengthen contractor management, and reduce delivery delays.

Systems and Process Strengthening (Civica CX)
The Civica CX voids module and key-to-key workflow (from April 2026) have been introduced to standardise processes, improve visibility, and enhance accountability.

These systems will support separation of long-term and standard voids, improve data validation, and reduce reliance on manual tracking.

Progress to Date
Improvements have been made to reporting accuracy, including clearer distinction between void types and enhanced validation processes. Contractor mobilisation is progressing, supported by strengthened performance management to improve sequencing, mobilisation, and delivery timescales.

Next Steps
Further actions will focus on completing onboarding of voids contractors and energy/billing support, alongside continued embedding and optimisation of the Civica voids system. This will be complemented by a structured review and implementation of actions identified through the HQN Empty Homes Toolkit. Ongoing oversight will be maintained through regular voids workshops (next scheduled September 2026). In parallel, expansion of a Planned Preventative Maintenance (PPM) approach will reduce reliance on reactive void works and improve overall property condition at tenancy end. These improvements will also support service readiness for increased demand associated with the York Way development and future housing delivery.

Recommendation

Members are asked to note the Improvements being made to improve our performance on reletting empty homes

7. Housing Performance Update – 1 April 2025 – 31 March 2026

The performance dashboard for the year 2025/26 is included below.
The key points of note are as follows:
Unless otherwise stated percentage based measures represent an average across the financial year 2025/26
Next year we will be able to provide Members with trend data as the performance measures are now stable
There have been marked improvements in compliance performance
The main contractor performance is broken down making it easier to distinguish the performance of our key contractors
Civica CX our management system is being configured to allow system based reporting by officers of inspections, damp and mould, elements of the void management process and ASB. This will make it easier to record performance and provide more robust reporting. Work is being done with staff to support them in adopting these new working practices.

Recommendation

Members are asked to note the content of the performance dashboard and the 2025/26 performance.

Appendix 1:

Housing Performance Dashboard (1 April 2025 – 31 March 2026)

Please note that compliance-related figures may vary slightly from those reported in the Compliance Risk Register, as data extracts may be taken at different points in the month and figures are subject to ongoing change.

Unless otherwise stated, percentage-based measures represent an average across the reporting period (financial year 2025/26).

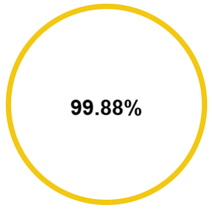
For any feedback or queries relating to the dashboard's layout, please contact anna.donoghue@cityoflondon.gov.uk.

Housing Performance Summary: TSM Management Measures:

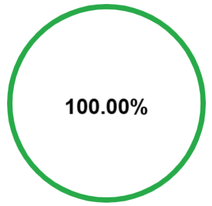
Month
All

Compliance Measures (Target 100%):

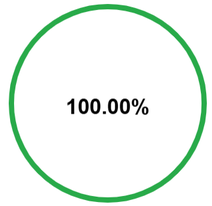
% Homes with Valid CP12



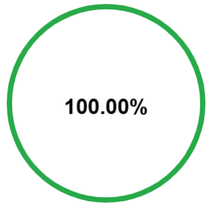
% homes for which FRAs have been carried out



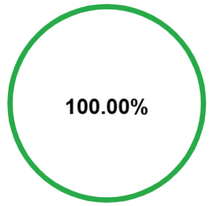
% Blocks with Valid Asbestos Survey/Reinspection



% Blocks with a Legionella Risk Assessment

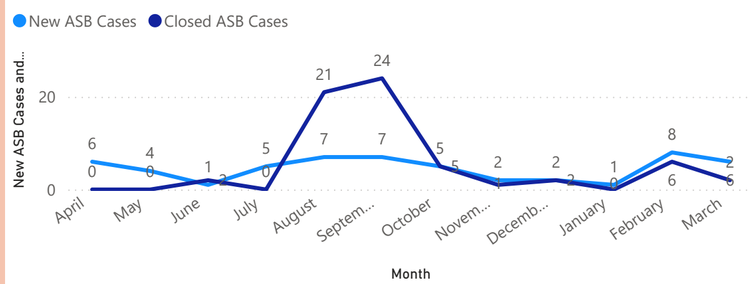


% Tenanted Homes in Blocks with Completed LOLER



ASB:

ASB Cases

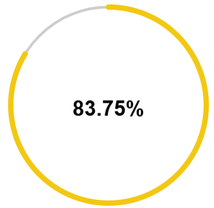


0

Total Number of Hate Crimes Recorded

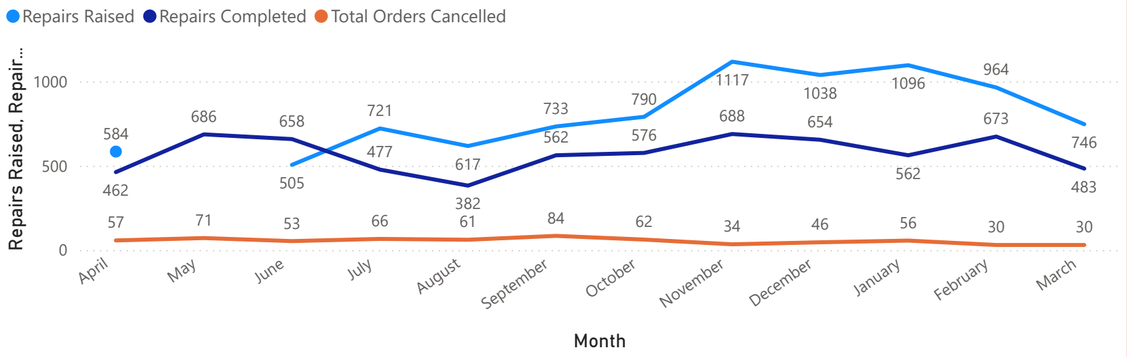
Decent Homes:

% Decent Homes



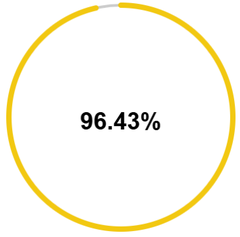
Repairs:

Repairs (All Contractors)



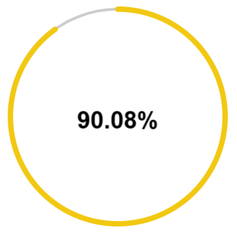
Repairs: Chigwell:

Average Repairs Completed Within Timescale (All Priorities)



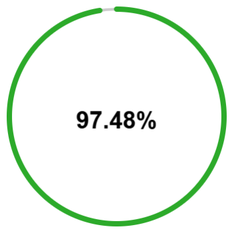
Target 100%

Emergency Repairs Completed Within Timescale



Target 100%

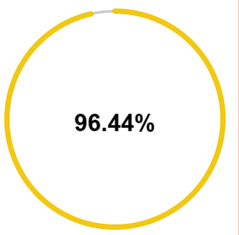
Non-Emergency Repairs Completed Within Timescale



Target 93%

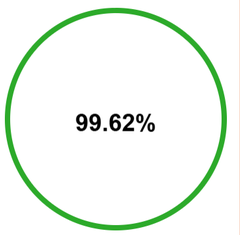
Repairs: TSG:

Emergency Repairs Completed in Timescale



Target 100%

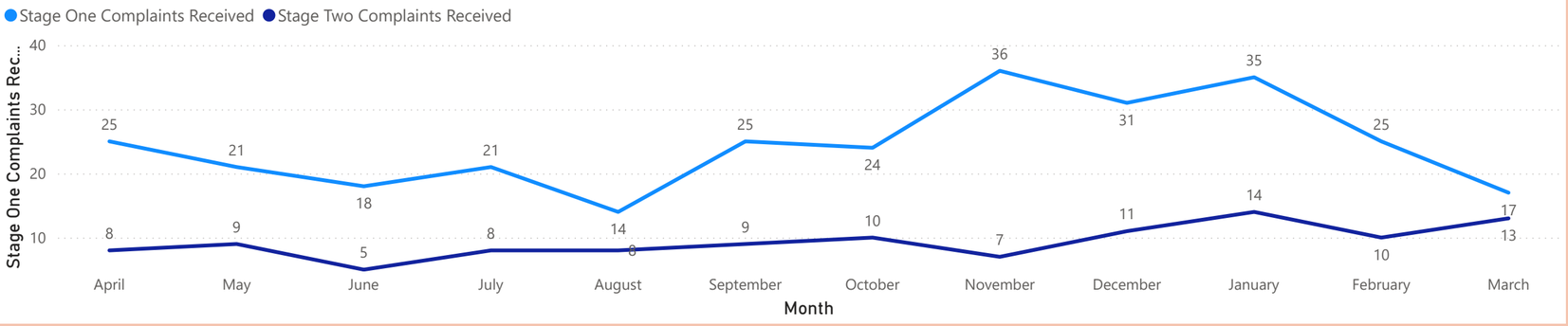
Non-Emergency Repairs Completed in Timescale



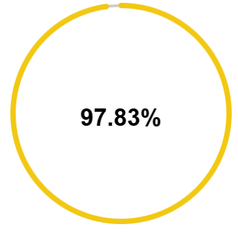
Target 93%

Complaints:

Complaints Received

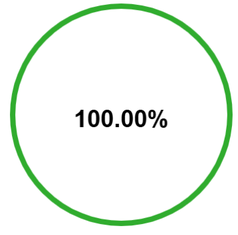


Complaints Acknowledged within 5 Working Days



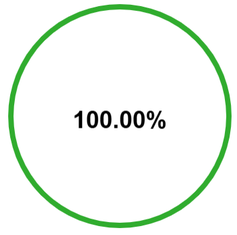
Target 100%

Stage One Complaints Responded to in Statutory Timescale



Target 100%

Stage Two Complaints Responded to in Statutory Timescale



Target 100%

TSM Management Measures:

Measure:	Context:	Mitigations:	Year-End Position
Compliance Measures (Target: 100%) Position at 31 March 2026			
% Homes with Valid CP12	Performance remains stable and in line with 2024/25 year-end position.	Gas safety is managed through a 10-month servicing cycle, providing a two-month window to complete access via a structured three-stage process, including legal escalation where necessary. Legal proceedings are initiated where access is persistently denied. Upcoming risks continue to be monitored proactively.	At year end, two properties remained overdue and were within the NOSP process. Following engagement with the City Solicitor, Legal Services will now be copied into access correspondence at an earlier stage, allowing earlier advice and more timely escalation where access issues persist.
Anti-Social Behaviour (ASB)			
Closed ASB Cases	Civica CX was implemented from 1 September 2025 to manage ASB cases, improving visibility and process consistency.	Area Manager audits of live cases confirmed general procedural compliance, but identified that cases were not always formally closed. The transition to CX prompted review and closure of legacy cases.	Case management is now actively monitored through CX and routine audits. A small increase in ASB cases was recorded towards year end, primarily linked to noise nuisance across estates. No hate crimes were recorded in 2025/26. In December 2025, staff completed hate incident training to strengthen understanding of classification and recording requirements.
Decent Homes (Target 100%) Position at 31 March 2026			
% Decent Homes	Data quality issues identified in the 2024/25 submission have now been corrected.	Ongoing monitoring is in place to identify properties at risk of falling into non-decency. The Stock Condition Survey commence in 2025/26, with survey data being received and uploaded into Keystone to improve asset intelligence.	The proportion of decent homes increased slightly (c.1.5%), influenced by new developments coming online at the start of 2026. Full trend analysis of stock condition survey will follow.

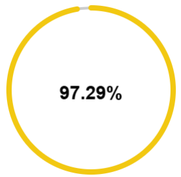
Repairs			
Repairs Completed within Timescale (All Priorities)	Performance peaked at 99% in August 2025, before falling to 91% in December. Performance stabilised between 97–98% from January to March 2026.	Performance is closely monitored, with all delays reviewed on a case-by-case basis. Weekly reviews identify jobs exceeding agreed timescales to ensure early intervention.	Instances of out of target completions remained low in volume towards year end (e.g. 16 completed jobs out of timescale in March 2026). Overall non-emergency performance remains within target.
Emergency Repairs Completed Within Timescale	This measure combines Chigwell and TSG performance. Recorded failures are largely attributable to data recording issues (e.g. retrospective out-of-hours orders automatically recorded as late), rather than operational delays.	The Repairs Service Desk received training on setting accurate start and completion dates for retrospective jobs. Civica CX functionality is used to backdate completed jobs where appropriate.	Each failure was reviewed individually, with evidence requested to confirm root cause. These were discussed at contract monitoring meetings to ensure accountability. In March 2026, performance was 88% for Chigwell and 100% for TSG.
Complaints			
Complaint Volumes (Stage 1 & 2)	Complaint volumes increased across the year in line with sector trends. The service has been actively promoted.	Benchmarking confirms complaint volumes exceed London and national averages; however, this reflects an accessible and transparent complaints process rather than service failure. Improvements have focused on investigator training, capturing lessons learned, and reducing escalation rates.	A peak in complaints was observed between November 2025 and January 2026, aligning with seasonal repair issues (e.g. heating, water ingress). Volumes reduced towards year end, alongside a reduction in Stage 2 escalations.
Complaints Acknowledged Within 5 Working Days	A small number of acknowledgements (four cases in October–November 2025) fell outside timescale due to administrative issues (e.g. emails in junk folders, delays in internal forwarding).	Improvements include weekly inbox checks, regular junk folder reviews, and reinforcing expectations across teams for timely referral of complaints.	A small proportion of acknowledgements fell outside timescale across the year; however, performance recovered, achieving 100% compliance in March 2026.

Housing Performance Summary: (Non-TSM):

Month
All

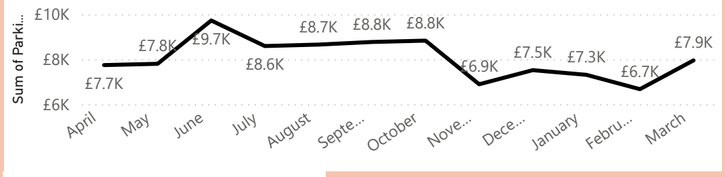
Income:

Rent Collected (Average)



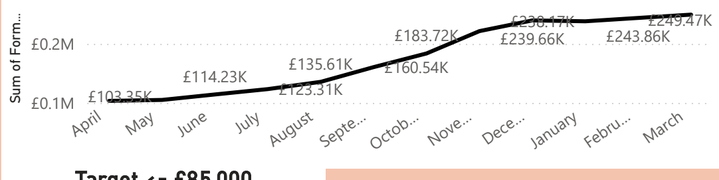
Target 100%

Parking Arrears



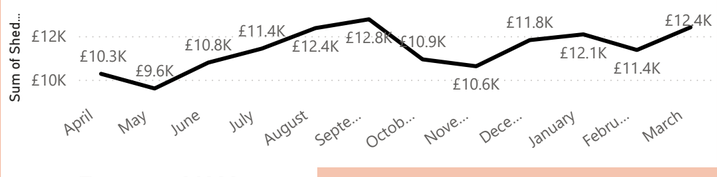
Target <= £5000

Former Tenant Arrears



Target <= £85,000

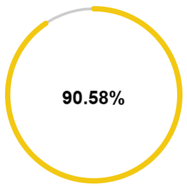
Shed Arrears



Target <= £4000

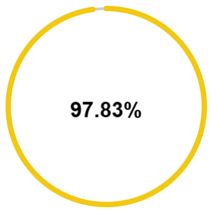
Estate Services:

Average of Monthly playground inspections completed



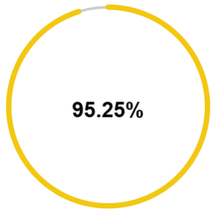
Target 100%

Average Monthly Fire Box Checks Completed



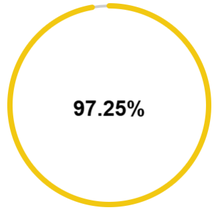
Target 100%

Quarterly Estate Grounds Inspections Completed



Target 100%

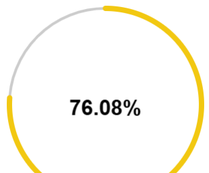
Monthly Internal Inspections completed



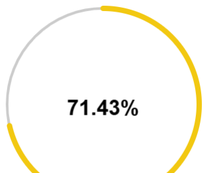
Target 100%

Tenancy Management:

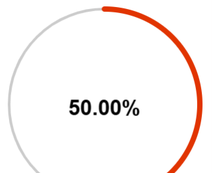
North Visits Completed Within TImescale



South Visits Completed Within Timescale



9 Month Visits Completed (Sheltered)

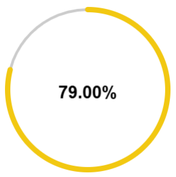


Sheltered Visits Completed Within Timescale



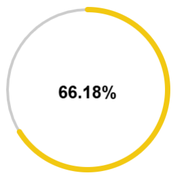
Repairs:

Required Post-Inspections Completed Within 10 Working Days



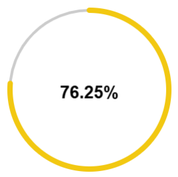
Target 90%

Average Pre-Inspections Completed Within 10 Working Days



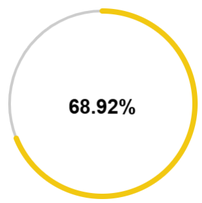
Target 90%

Average Damp & Mould Investigations Carried Out within 10 Working Days



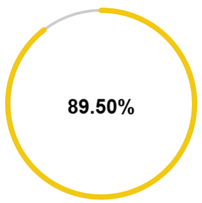
Target 90%

Satsfaction with first time fix



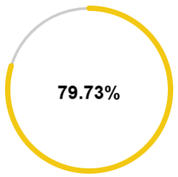
Target 80%

Post-Inspections Passed (Chigwell)



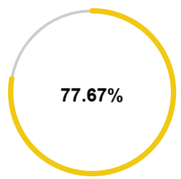
Target 95%

Emergency Communal Repairs Completed in Timescale (Chigwell)



Target 100%

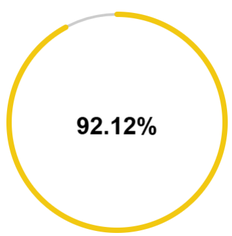
Overall Satisfaction with Completed Repair



Target 80%

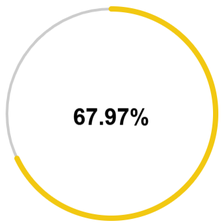
Repairs Service Desk:

Average % of Incoming Calls Answered



Target 95%

Average % of Calls Answered in 30 Seconds



Target 75%

Housing Performance Summary: (Non-TSM):

Month
All

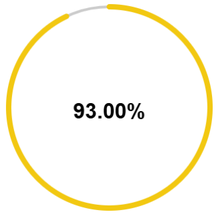
Voids:

195.70

Average re-let time in days (for properties let in the month)

Electrical Safety:

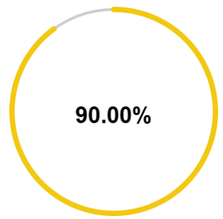
Proportion of Tenanted Properties with Valid EICR Cert



Target 100%

Water Safety:

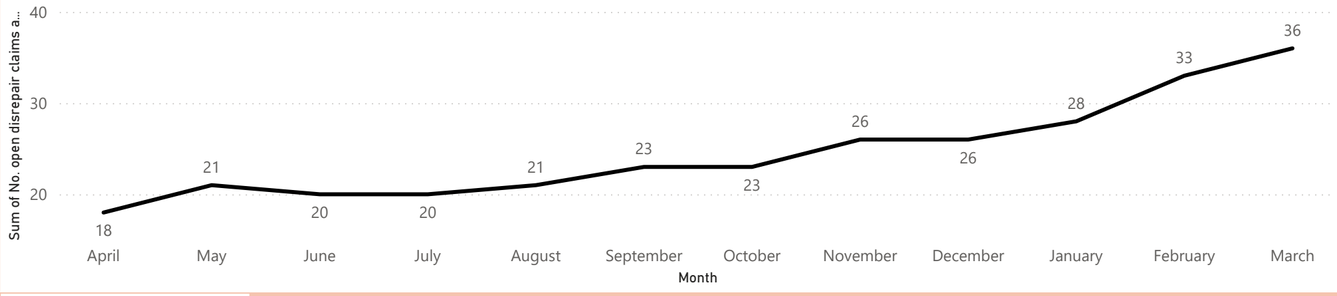
Proportion of Cold Water Storage Tanks Which are Compliant



Target 100%

Disrepair:

Number of Open Disrepair Cases at Month End



Target <=19

Non TSM Measures:

Measure:	Context:	Mitigations:	Progress
Income			
Rent Collected	The 2024/25 average was 96.86% against a target of 100%. In 2025/26, it was agreed that there would be an accepted 2% operational tolerance. The measure applies to residential rent only.	Progression of historic possession cases, with High Court evictions now being scheduled.	Rent collection peaked at 99% in November 2025 and closed at 97%, with an annual average of 97.29%, consistent with sector norms
Former Tenant, Parking and Shed Arrears	The Civica CX former tenant arrears module was not yet live at the start of the financial year, limiting automation and reducing frequency of tenant contact.	Implementation of CX arrears modules was prioritised, with automated letters ready for deployment once live. Modules for parking and sheds were in testing, with policies and templates already configured.	Modules for sheds, parking, and garages are now available for testing in the Civica CX test environment. All related arrears letters are already loaded in the live system, enabling automatic or ad hoc issue as required. Current and former arrears policies are active in CX Live. Former tenant arrears continue to increase, driven largely by legacy cases and delays in enforcement. Parking and shed arrears fluctuate but have both increased slightly since April 2026.
Estate Services			
Inspection Regimes (Playgrounds, Fire Boxes, Grounds, Internal)	Performance is sensitive to low inspection volumes, where a small number of missed inspections can significantly impact percentages.	Performance is monitored through team meetings and 1:1s. Data input accuracy has been reinforced through targeted engagement with staff.	Performance improved significantly following early-year dips (e.g. playground inspections increased from 22% in July to 100% in September/October). Across January to March 2026, 100% completion was achieved for playground inspections. Minor dips in March (fire box

			checks and internal inspections) were due to staff absence but were rectified in the following period.
Tenancy Management			
Introductory Tenancy Visits	Due to low volumes, a small number of missed or delayed visits has a disproportionate impact on performance. Delays can also occur due to resident availability.	Area Managers continue to monitor performance through 1:1s, requiring justification where visits are not completed within timescale.	Performance improved significantly towards the end of the financial year. General Needs tenancy visits achieved 100% compliance between January and March, while sheltered tenancy visits were fully completed in December and January. One visit in March (North Estate) was delayed due to resident unavailability and subsequently completed.
Repairs (Operational Detail)			
Post-Inspections Completed within 10 Working Days	Post-inspection volumes increased significantly following activation of Civica CX functionality in mid-August 2025. This resulted in a step change in reporting, with 56 post-inspections recorded in September alone.	A tiered inspection approach has been introduced to prioritise complex cases. Lower-value inspections (£75–£200) are undertaken as telephone-based checks via the Service Desk, allowing Property Services Officers (PSOs) to focus on higher-risk or more complex works. Post-inspections are also routinely triggered following complaints.	Volumes continued to increase across 2025/26 as the process became embedded. Performance against timescale has been more variable, with 87% completed within target in January reducing to 68% in March. This dip is attributable to PSO staffing pressures and reduced inspection capacity.
Pre-Inspections	Historically, pre-inspections were being under reported.	PSOs were trained in 2025/26 to raise and complete inspection records directly within CX to improve data accuracy.	Increased volumes (e.g. 58 in January 2026) demonstrate improved compliance, though performance dipped in February–March due to staff absences and redeployment to voids.
Damp & Mould Investigations	The service undertook a full end-to-end process review	Civica CX case management functionality is now used to manage damp and mould cases end-to-end.	Performance improved following implementation, achieving 100% completion within timescale in March 2026

	ahead of Awaab's Law (October 2025).		despite increased demand linked to survey activity and seasonal trends.
Repairs Satisfaction	Satisfaction data is derived from post-repair transactional surveys.	Ongoing monitoring through contract management, with a particular focus on first-time fix performance.	Satisfaction with appointments kept remained consistently high. However, satisfaction with first-time fix declined over the year, falling to approximately 69–70% between January and March 2026. Satisfaction with completed repairs remained slightly higher (76–84% during the same period).
Post-Inspections Passed (Chigwell)	Reporting on this measure commenced from August 2025 following activation of CX functionality. Early analysis prompted clarification with the contractor regarding when inspections should be triggered (i.e. only once works are marked as complete).	All post-inspection data was jointly reviewed and validated with Chigwell to ensure consistency and accuracy. Each failed inspection was reviewed individually and referred back to the contractor for remedial action.	The number of failed inspections increased over time (e.g. 3 failures out of 38 inspections in November 2025, rising to 11 out of 37 in February 2026), indicating a decline in quality outcomes. Failed inspections across 2025/26 were subject to follow-up action.
Emergency Communal Repairs Completed in Timescale (Chigwell)	Reported performance is impacted by data recording issues, particularly where contractors raise orders retrospectively (e.g. out-of-hours works), which results in jobs being automatically flagged as late. Analysis confirms that these cases are generally not due to delays in attendance or service delivery.	Weekly contract monitoring included a review of all KPI failures. The Repairs Service Desk has received training on accurately recording retrospective jobs, including correct start and completion dates. Civica CX functionality is used to backdate jobs where appropriate to improve reporting accuracy.	Performance improved over the course of the year, rising from a low of 36% in June 2025 to 88% in March 2026. Each job falling outside of target was reviewed individually to confirm root cause and ensure appropriate follow-up action. In March 2026, two emergency communal repairs were completed outside of target timescale

Repairs Service Desk			
Call Handling Performance	Call handling performance fluctuated in line with increased demand, with peaks in call volumes (e.g. February 2026 – 1000+ calls).	Robust management and oversight are in place, and we are actively monitoring call data to identify trends and improvement opportunities. An enquiry was raised with the telephony provider in **October 2025** to explore separating call data for new repair requests and follow-up enquiries. This distinction will help us: • Understand repeat contact patterns more accurately. • Identify potential service issues earlier. • Strengthen contractor performance monitoring.	Some performance indicators remain below target; however, further improvements are expected through enhanced data visibility and service demand analysis. The enquiry into separating call volumes remains ongoing, with continued engagement with IT. Call handling performance is also being reviewed across the wider Housing Service to strengthen data quality and improve understanding of service demand and performance drivers. In the interim, Repairs Service Desk officers are manually recording call types to provide an indicative view of demand by contact category.
Voids			
Average Re-Let Time (Days)	Average re-let times significantly exceed benchmarks.	Two voids workshops (October and December 2025) resulted in a revised key-to-key process. A manual tracker remains in place pending full CX adoption.	This area is subject to an ongoing end-to-end process review. Average re-let times remain above industry benchmarks, reflecting a combination of factors, including persistent challenges within the voids process that are still being addressed. For example, delays can arise where gas or electricity meter debts must be cleared before utilities can be reconnected,

			preventing contractors from commencing works. While identified data issues are being resolved, a manual void tracker remains in place to monitor progress on the works element of the process. The Civica CX Voids Module went live on 20 April and is expected to provide clearer, more consistent tracking across the full key-to-key process. In addition, the introduction of dedicated voids resources and contractors is expected to improve oversight and contribute to a reduction in overall re-let times.
Electrical Safety (EICR) **Position at 31 March 2026**			
Proportion of Tenanted Properties with Valid EICR Certificate	Historical resourcing and ownership gaps impacted compliance.	Two contracts were mobilised to address backlog and improve delivery Performance position was communicated to the Regulator, along with mitigations to manage risk during delivery.	Compliance has improved significantly, reaching 93% at year-end (up from 36% in April 2025).
Water Safety **Position at 31 March 2026**			
Proportion of Cold-Water Storage Tanks Which Are Compliant	Performance impacted by access issues and data quality limitations.	A new contractor was onboarded and data cleansing undertaken to improve accuracy and alignment with compliance requirements.	Tanks volumes have been reconciled under the new supplier (TDK). Performance improved from c.44% to 90% at year end, with stronger data flows now feeding into compliance tracking.

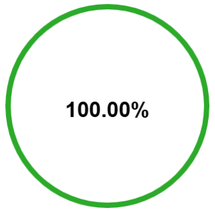
Disrepair			
Disrepair Cases Open at Month End Exceeding Target	Cases may remain open due to legal processes, including outstanding invoices or cost settlement, rather than outstanding works.	Regular monitoring takes place through meetings with the Property Services Team	A relatively low number of new cases were received (22 across the year). At year end, 14 cases remained open where settlement had been reached but works or legal costs were outstanding, meaning cases remain reported until fully resolved.

Housing Performance Summary: Highlights (Non-TSM):

Month
All

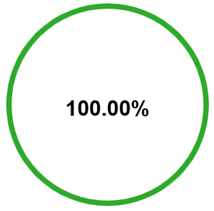
Allocations:

Average Properties Offered within 5 Days of Bid End



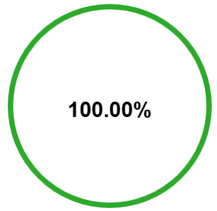
Target 90%

Average Applications Processed within 30 Working Days



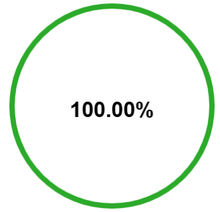
Target 95%

Average Properties Offered within 10 Days of Handover



Target 90%

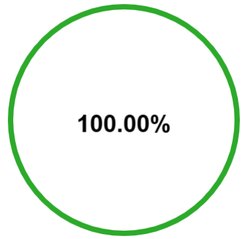
Average Mutual Exchanges Decided within 42 Days



Target 100%

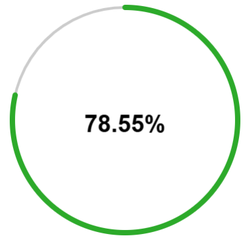
Estate Services:

Average Monthly Fire Door Checks Completed



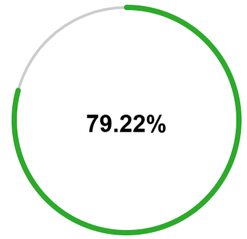
Target 100%

Average Grounds Inspection Score



Target 75%

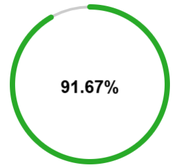
Average Internal Inspections Score



Target 75%

Repairs:

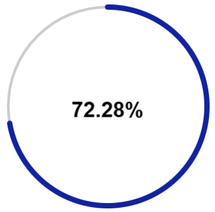
Satisfaction with Appointment Made & Kept



Target 80%

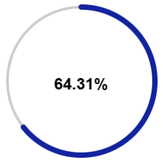
Golden Lane Community Centre:

Average % of Available Time that is Booked



Complaints:

Average Satisfaction with Complaint Handling Process (Tenants)



44

Number of Compliments Received (Total)

Gas Safety:

Morgan Lambert Assurance Pass Rate (Average)



Target 100%

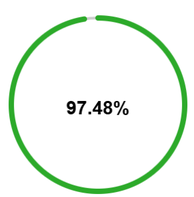
Proportion of Communal Boilers Which are Compliant



Target 100%

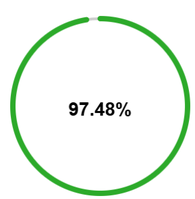
Chigwell:

Non-Emergency Repairs Completed Within Timescale



Target 93%

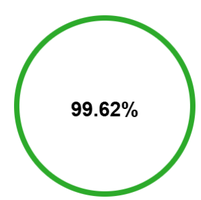
Non-Emergency Repairs Completed Within Timescale



Target 93%

TSG:

Non-Emergency Repairs Completed in Timescale



Target 93%

Emergency Communal Repairs Within Timescale



Target 100%

Non-Emergency Communal Repairs Completed Within Timescale



Target 98%

8. Pennington Choices Compliance Review

The City of London Housing's Service commissioned an independent compliance review by Pennington Choices to assess its approach to landlord health and safety compliance, including policy frameworks, management arrangements, and alignment with relevant legislation and regulatory expectations. The review covered core areas of compliance (gas, electrical, fire, asbestos, water and lift safety) and provided a structured gap analysis alongside recommendations for improvement. Overall, the review found that policies are generally well developed and clearly set out statutory obligations, but identified opportunities to strengthen consistency, standardisation, and assurance through improved policy alignment, enhanced data quality, and more robust reporting arrangements.

The review has generated a comprehensive set of recommendations, many of which have already been incorporated into the Housing Action Plan, with a particular focus on improving the accuracy and presentation of compliance data and strengthening oversight. The Regulator of Social Housing welcomed the commissioning of an independent third-party review and has requested sight of the outcomes as part of ongoing engagement. Further work is underway to embed the recommendations into business-as-usual processes, including alignment with internal audit arrangements for the 'big six' compliance areas. A further update, including progress against the action plan and any emerging findings, will be reported back to Members in September.

9. Housing Complaints Policy - Amendments made following Housing Ombudsman Service Review

Following a review of our Housing Complaints Policy by the Housing Ombudsman Service we have updated the Policy. The revised policy is below:

City of London Corporation Department

of Community & Children's Services

Housing Complaints Policy

Approved by:	***Housing Management & Almshouses Sub-Committee***
Original Approval Date:	***May 2017 (v.1), May 2019 (v.2), Sept. 2021 (v.3)***
Review Date:	***May 2024 (v.4)*** ***July 2026 (v.5 – Ombudsman Review)***
Re-Approval Date:	***04/07/2024 (CCS – v.4)***
Next Review Date:	***July 2029***

1. Purpose and scope

1.1 We have this policy because we value feedback and complaints about our services and want residents and service users to know about our approach to complaints. We aim to provide good quality services but sometimes we get it wrong. When this happens, we want to make it as easy as possible for residents to tell us and know that we will respond positively, quickly and fairly.

1.2 This policy applies to:

- City of London tenants, leaseholders, freeholders, and licensees who receive services from the Housing Service
- Those affected by the City of London Housing Service
- Those applying for services delivered by the City of London Housing Service

2. Policy aims and objectives

2.1 Our priority is to put things right if they go wrong. To help us do this, we aim to deliver an excellent complaint handling service that puts the complainant at the heart of what we do and gives them the chance to express their point of view and the get the outcome they seek.

2.2 A key objective of this policy is to help us better understand the resident experience. We will use this insight as an opportunity to learn and continually improve our services.

2.3 This policy is intended to enable us to comply with the Housing Ombudsman's Complaint Handling Code.

3. Definitions

3.1. We have adopted the following definition of a complaint from the Housing Ombudsman's Complaints Handling Code:

A complaint is an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.

3.2. A service request is a request from a resident for us to take action to put something right in relation to the routine delivery of a service (for example, reporting a repair for the first time). A service request is not a complaint.

3.3. If a service request is not resolved to the resident's satisfaction, or if the resident expresses dissatisfaction with the handling, response, or outcome of the service request, the matter will be treated as a complaint and logged in accordance with this policy. Residents do not need to use the word "complaint" for this to happen.

3.4. Where a resident raises a complaint relating to a service request, attempts to resolve the underlying service request will continue and will not be paused, stalled, or delayed because a complaint has been raised. We will progress service delivery and complaint handling in parallel, where appropriate.

3.5 Staff will explain the difference between a service request and a complaint to residents and will ensure that residents are given a clear choice to pursue their concern as a complaint. Residents will also be advised about what this means in terms of timescales, escalation rights, and access to the Housing Ombudsman Service.

4. Exclusions

4.1. We aim to be open and accessible in how we handle complaints. However, there are some circumstances where we may decide that a matter is not suitable for consideration under the complaints process. These may include, but are not limited to, the following:

- **Age** – The issue giving rise to the complaint occurred more than 12 months ago from the date the matter occurred or from the date the resident became aware of the issue unless the issue is ongoing or recurring. We will consider whether to apply discretion to accept complaints outside this time limit where there are good reasons for the delay.
- **Legal action** – The matters raised are subject to legal proceedings. For the purposes of this policy, legal action is considered to have started once a claim has been formally issued or filed with a court or tribunal. This will not prevent us from continuing to take reasonable steps to resolve the underlying issue where appropriate.
- **Previous complaints** – The matter has been fully considered and reviewed under the complaints process, and no new information or substantive issues have been presented.
- **Not within our control** – Complaints about services, people or bodies over which we have no control.

- **Insurance claims** - Claims for damages or personal injury that are being dealt with through our insurers. However, we will accept and investigate complaints about our handling of an insurance claim, including issues such as communication, delays, or customer service.
- **Alternative appeals or review procedures** – Issues where there is a separate, established legal, regulatory, or appeals process which provides an appropriate route for redress. For example, disputes relating to service charges, lease terms, or administration charges which fall within the jurisdiction of the First-tier Tribunal (Property Chamber).

4.2. We do not apply a blanket approach to exclusions. Each case will be considered on its merit, and discretion will be applied where appropriate.

4.3. Where we decide that a complaint will not be accepted, we will write to the complainant setting out:

- the reasons why the complaint is not suitable for investigation under this policy; and
- their right to challenge this decision by referring the matter to the Housing Ombudsman Service.

Contact details for the Housing Ombudsman Service will be provided.

4.4. If the Housing Ombudsman Service does not agree with our decision to exclude a complaint and requests that we investigate the matter; we will do so in line with this complaints policy.

5. Service standards

5.1 When we provide a complaints service, residents can expect the following from us:

- To be provided with information about our complaints service in a variety of formats
- If we do not accept a complaint, we will explain the reasons why
- Use plain language and make clear the outcome of the complaint
- Acknowledge a complaint within 5 working days
- Provide a response at Stage 1 of our process within 10 working days
- Provide a response at Stage 2 of our process within 20 working days of the complaint being escalated.
- When we offer a remedy, we will set out what we intend to do and the timescales
- If we decide not to escalate a complaint, we will provide an explanation

6. Legislation and regulation

6.1 This policy will have regard to the following requirements of the Regulator of Social Housing:

- Transparency, Influence and Accountability Standard - We will adopt an approach to complaints that is clear, simple and accessible and ensure that complaints are resolved promptly, politely and fairly. We will treat complainants fairly and with respect.

- Value for Money Standard – We will make the best use of our resources by learning from complaints and minimising mistakes.

6.2 In April 2024, the Housing Ombudsman's revised Complaint Handling Code came into effect. This policy will ensure we comply with the Code and that we are able to meet the expectations of the Housing Ombudsman and the Regulator of Social Housing, relating to housing complaints.

7. Our approach to complaints

7.1 Access and Communication

We will make the complaints service accessible to all residents using a range of channels through which residents can make a complaint, including our website and any official social media platforms. We will comply with our Equality Act duties and tailor our service to meet an individual's needs, making whatever adjustments are required, in accordance with our Reasonable Adjustments Policy. We will keep residents regularly updated using methods of communication agreed with each resident.

Residents may make a complaint in any way and to any member of staff. Complaints may also be made on a resident's behalf by a representative, such as a family member, advocate, support worker, councillor, MP, or other authorised person. **Complaints submitted by a representative will be accepted, investigated, and handled in accordance with this policy and will not be treated differently or less favourably than complaints made directly by the resident.** Where appropriate, we will fully engage with the representative throughout the complaint process. We will also encourage and signpost residents to advice and advocacy services as appropriate.

We will make information about our complaints service available in clear and accessible formats. All our communications will use plain language. When we respond to complaints, we will make the outcome clear and explain the reasons for any decision made.

Where a resident's expectation is unrealistic or unreasonable, we will explain this to the resident. If we consider that it may help to resolve a complaint, we seek the complainant's permission to engage with professional mediators as an alternative means of finding an effective resolution.

We will report back to our involved residents on our performance and ensure that information is regularly provided to all residents on how well we are delivering our complaints service and improvements that have come about as a result of complaints.

We will ensure that all staff understand the difference between a service request and a complaint and that they are aware of the complaints process and understand that complaints can be made in any format. Staff will also be clear on how and where complaints, including those submitted by representatives, should be recorded and progressed.

7.2 Awareness

We will raise awareness of our complaints service. We will use our website, newsletters, leaflets and other communications to ensure residents know how to complain.

Part of the information that we make available to residents on our website will include contact information for the Housing Ombudsman, and information about the Complaint Handling Code. We will explain the role of the Housing Ombudsman and ensure residents are aware that they can contact the service at any point for help and advice throughout their complaint.

We will publish this policy on our website and provide it by e-mail or in hard copy upon request.

7.3 Complaint Handling Process

We aim to make complaint handling a resident focused accessible experience. The Housing Complaints Team will take responsibility for coordinating the handling of each complaint and will work with colleagues to seek a prompt and fair resolution. All complaints will be acknowledged, recorded, and responded to in line with this policy. Investigators will attempt to contact the resident to ensure they fully understand the issues raised and the outcome they are seeking.

Our priority is to resolve complaints at the earliest opportunity. Where appropriate, we will seek to put things right quickly through early resolution. There is no separate 'stage 0', 'informal', or pre-complaint process. All expressions of dissatisfaction that meet the definition of a complaint will be logged and handled in accordance with this complaints policy, unless they fall within one of the excluded categories set out in section 4 above.

Where we are able to resolve a complaint at an early stage, we will still provide the resident with a written complaint response. This will confirm the actions taken, the outcome achieved, and the resident's right to escalate the complaint if they remain dissatisfied.

We operate a two-stage complaints process, and all complaints accepted under this policy will follow this process. Residents will be advised of their rights at each stage, including how and when they can escalate their complaint and their right to refer the matter to the Housing Ombudsman Service.

Acknowledgments

When a complaint is acknowledged at either stage, we will be clear about which aspects of the complaint we are, and are not, responsible for and clarify any areas where this is not clear. Where we are not responsible, we will signpost or refer the complainant to the appropriate place.

Extensions

In some cases, such as those that are more complex, we may require an extension to the standard response timescales. Where an extension is necessary, we will notify the resident in writing, explaining the reason for the extension and confirming the revised response date.

Extensions will be no more than 10 working days at Stage One and 20 working days at Stage Two, unless there is a clear and justifiable reason for a longer period.

Where a complaint falls outside the standard timescales, we are committed to keeping residents informed and ensuring transparency throughout the complaints process. Where appropriate, we will agree suitable intervals with the resident for providing updates on progress and will keep them informed until a full response is issued.

Stage One

The first stage will be a full investigation. The investigation will be carried out by a senior manager who will be impartial and seek the information they need to find an outcome that would resolve the matter for the resident.

Stage Two

Where a complaint has not been resolved to the resident's satisfaction at Stage One, we operate a second stage of the complaints process. Stage Two provides residents with the opportunity to request a review of their complaint and to challenge the decision, response, or remedy provided at Stage One.

Requests to escalate a complaint to Stage Two will be acknowledged, clearly defined, and logged within five working days of receipt of the escalation request. The acknowledgement will confirm that the complaint has progressed to Stage Two and will set out the applicable timescales.

We will escalate a complaint to Stage Two where all or part of the complaint remains unresolved to the resident's satisfaction. Residents are not required to provide a reason for requesting escalation. However, we will make reasonable efforts to understand why the resident remains dissatisfied, as this will inform our Stage Two review.

We will only refuse to escalate a complaint to Stage Two where one or more of the exclusion criteria set out in section 4 of this policy applies. We will not otherwise refuse escalation. Where escalation is refused, we will explain the reasons for our decision in writing and advise the resident of their right to challenge this decision by contacting the Housing Ombudsman Service.

A Stage Two response will be provided within 20 working days of the acknowledgement of the Stage Two escalation request, not from the original complaint acknowledgement. This is to ensure clarity and manage resident expectations.

At the conclusion of Stage Two, the resident will be provided with a written response setting out our final position on the complaint, details of any actions to be taken, and information on how to refer the complaint to the Housing Ombudsman Service. We will fully co-operate with the Ombudsman and will continue to seek opportunities to resolve the complaint where possible.

Additional Complaints

If a complainant raises an additional complaint during the investigation, we will incorporate it into the investigation at Stage 1 if the subject is related to the complaint currently under investigation. If the stage one complaint response has been issued, or if the subject of the new complaint does not relate to the existing one, the new issues will be logged as a new complaint

Complaint Responses and Outstanding Actions

A complaint response will be provided to the resident when our position and response to the complaint are finalised. The response will not be delayed until all outstanding actions required to address the issues have been completed. This applies at both Stage One and Stage Two of the complaints process.

Where actions remain outstanding at the point a complaint response is issued, the response will clearly set out:

- the actions that are still required;
- who is responsible for completing them; and
- the expected timescales for completion.

Outstanding actions will continue to be monitored, tracked, and progressed promptly during and after the complaint response has been issued. Residents will be provided with regular updates on the progress of any outstanding actions until they are fully completed, at both Stages One and Two.

7.4 Putting things right

We know that for most complainants when we have failed to provide a service the priority is to put things right. We will have processes in place to ensure a complaint can be remedied at any stage of our complaints process, and that appropriate remedies can be provided at any stage of the complaints process without the need for escalation.

When we have failed in service delivery, or where something has gone wrong, we will acknowledge this and apologise. Outcomes may include:

a) Setting out the actions that we have taken or intend to take to put things right
b) Providing an explanation, assistance, or reasons for an action or decision
c) Reviewing and reconsidering decisions taken
d) Amending or correcting records
e) Providing a financial remedy (please refer to the Compensation Policy)
f) Changing policy, procedure or working practices

Any remedy offered by us will reflect the extent of the service failure and the impact on the resident. When needed we will exercise appropriate discretion to find a remedy.

We recognise that putting things right may not, on its own, repair the relationship with a resident. Where appropriate, and to help rebuild trust and confidence, we may offer the support of an independent third party, such as a mediator. Mediation is intended to support the resident, facilitate constructive dialogue, and assist all parties in working towards a mutually acceptable resolution. The mediator will not be responsible for investigating or responding to the complaint, and the use of mediation will not alter the complaints process or timescales.

7.5 Learning and improvement

We will ensure that we learn from complaints to keep improving. We will look beyond individual complaints to identify where our processes or policies need to change. We will ensure that this approach is part of our service planning framework and informs staff training and development.

7.6 Unacceptable complainant behaviour

If a complainant behaves unreasonably at any stage of the complaints process, we will apply our policy on unreasonable behaviour. Unacceptable or unreasonable behaviour could include:

- making numerous complaints about minor matters or matters which staff cannot change, which take up an unreasonable amount of staff time
- contacting multiple officers to complain about the same issue
- being abusive or offensive to staff or using inappropriate language
- making unfounded or unsupported complaints that may be malicious in nature.

If we consider a complainant to be unreasonable, we may close an existing complaint down or limit the means by which the resident can communicate with us. Decisions will be made in accordance with our Unreasonable Behaviour Policy and due regard will be had to any applicable equalities considerations. Once a decision has been made, we will inform the complainant and explain the reasons for our decision.

8. Responsibilities, monitoring and performance

8.1 Overall responsibility for this policy and its implementation rests with the Director of Housing, as the senior lead person responsible for complaints. The Director of Housing will ensure that staff receive the appropriate training and support to achieve the aims of this policy. Where needed we may establish appropriate operational procedures.

8.2 Monitoring the implementation of this policy and our performance in handling complaints will be the responsibility of the Housing Management and Almshouses Sub-Committee. The Chair of that Committee is the Member Responsible for Complaints. We will provide complaints performance information to this Committee on a quarterly basis. Performance on complaints will also be included in our Annual Report for Tenants. We will carry out regular self-assessments against the Complaints Handling Code and ensure that our performance measures drive improvements.

8.3 We will publish an Annual Complaints and Service Improvement Report, as required by the Complaint Handling Code. This will be presented to Committee. It will include:

a) an annual self-assessment against the Ombudsman Complaints Handling Code to ensure that this policy remains in line with its requirements.

b) analysis of complaints including a summary of complaints that have not been accepted for investigation.
c) findings of non-compliance with the Code by the HOS
d) annual report about the landlord's performance from the HOS
e) any other report of publications produced by the HOS in relation to the work of the landlord.

This report, and the Committee's response, will be published online.

8.4 The Housing Management and Almshouses Sub-Committee will scrutinise the Annual Complaints Performance and Service Improvement Report, including the landlord's self-assessment against the Complaint Handling Code. The Sub-Committee will provide a formal written statement confirming that it has reviewed the self-assessment and whether it agrees with its contents, alongside commentary on key findings, challenges, and areas for improvement. This statement will form part of the Annual Complaints Performance and Service Improvement Report.

8.5 The Annual Complaints Performance and Service Improvement Report, including the Sub-Committee's statement, will be published on the complaints section of our website. We will also publish complaints performance information and our annual self-assessment against the Complaint Handling Code to ensure transparency and accountability to residents.

9. Equalities

9.1 We will make reasonable adjustments for complainants where appropriate under the Equality Act 2010, and our Reasonable Adjustments Policy. We will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any reasonable adjustments agreed will be kept under active review.

10. Data Protection and Confidentiality

10.1 We will comply with our obligations under relevant data protection legislation and regulations. We will process and store personal information securely. There are some circumstances in which we are required by law to disclose information given to us. Where possible, we will explain this duty to the person providing us with the information before disclosing it.

11. Associated policies

- Compensation Policy
- Unreasonable Behaviour Policy

- Reasonable Adjustments Policy

12. Document Management

Document Owner: Director of Housing

Document review history			
Version	**Date amended**	**Date approved**	**Key changes**
1.0		May 2017	New policy
2.0		May 2019	Re-approval only
3.0	Sept. 2021	20/09/2021	Stage three removed to comply with Ombudsman's Complaints Handling Code Stage Two timescale extended to 20 working days
4.0	May 2024	4/7/2024	Multiple changes to bring the policy in line with the April 2024 version of the Housing Complaint Code, approved at Community & Children's Services Committee on 4 July 2024
5.0.	July 2026		Amendments made following Housing Ombudsman Service Review

Recommendation

Members are asked to note the Housing Complaints Policy, that has been amended following a review carried out by the Housing Ombudsman Service.

10. **Conclusion**
Members are asked to note the following:

Decision

- **Local Lettings Policy – York Way**
- **Updated Pets Policy**

For Discussion / Information
Housing Services Recruitment Update
Local Lettings Update – Sydenham and Black Raven Court
Access to Homes Policy Update
Asset Management Strategy Refresh – Progress
Housing Design Guide Update – New Homes
Voids Process and the Improvements being made
Housing Performance Update 2025/2026
Pennington Choices Compliance Review
Housing Complaints Policy – Amendments following review by the Housing Ombudsman Service

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