Tenancy Audit Policy

Originator:	Policy and Strategy Team
Executive Management Team Approval Date:	September 2018
Review date:	September 2020

1	Introduction

1.1 One Vision Housing (OVH) strives to deliver excellent services that; meet or exceed customers' expectations, are tailored to individual needs, and ensure the best use of resources and value for money is achieved.

1.2 This Policy sets out OVH's approach and options for carrying out tenancy audits, which will inform service improvement options for the benefit of our customers and help the organisation to achieve its objectives.

1.3 The application of this Policy ensures compliance with the Regulatory Framework for social housing in England which was adopted by the Regulator for Social Housing (RSH) as outlined below:

Registered providers shall:

- Treat all tenants with fairness and respect
- Demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs
- Registered providers shall keep the neighbourhood and communal areas associated with the homes that they own clean and safe. They shall work in partnership with their tenants and other providers and public bodies where it is effective to do so
- Registered providers shall work in partnership with other agencies to prevent and tackle anti-social behaviour in the neighbourhoods where they own homes

1.4 Operation of this Policy also meets the following corporate aims:

- To provide the environment for business success
- To provide homes that meet demand in safe and sustainable neighbourhoods
- To provide excellent services that meet or exceed customers' and stakeholders' expectation
- To make positive impact in the communities in which we operate

1.5	Access and Communication
1.5.1	OVH is committed to ensuring that our services are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for us or use our services.
1.6	Equality, Diversity and Human Rights
1.6.1	OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out our duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Transgender, Sexual Orientation, Religion and/or Belief, Civil Partnership and Marriage, Pregnancy and Maternity.
1.6.2	OVH also recognise that some people experience disadvantage due to their socio economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.
1.6.3	OVH will also ensure that all services and actions are delivered within the context of current Human Rights legislation. Staff and others with whom OVH works, will adhere to the central principles of the Human Rights Act (1998).
1.7	This Policy should be read in conjunction with the following documents: • OVH Data Protection Policy • OVH Starter Tenancy Policy • OVH Demand Incentive Policy • OVH Repairs, Maintenance and Planned Works Policy • OVH Safeguarding Adults Policy • OVH Safeguarding Children Policy • OVH Lone Working and Personal Safety Policy

2	Statement of Intent
2.1	The purpose of conducting tenancy audits is to check the property condition, reduce tenancy fraud to ensure homes go to those in most need and identify tenancy management issues including tenants who require additional support to sustain their tenancies.
2.2	OVH will use tenancy audits to identify opportunities for service improvement, including tenants who wish to be involved with One Vision Housing and their preferred methods of involvement.
2.3	OVH will also use tenancy audits to identify households that are under occupying or overcrowded and develop the best ways to use its stock.
2.4	OVH's approach to accessing properties for tenancy audits will involve notifying tenants in advance of the required access date with an option to change the appointment, if not suitable.

2.5	Where possible, OVH will combine tenancy audits appointments with other services to minimise disturbance to tenants i.e. gas safety checks, repairs and maintenance.

3	**Policy**
3.1	OVH will operate a referral system to identify tenancies of high risk for tenancy audits across all of its properties. The properties to be audited will be identified on the basis of the following: • Referrals from Assets Team for no-access for works • Referrals made for properties identified as having poor living conditions • Tenancy audits carried out on tenancies of those who have perpetrated anti-social behaviour (including domestic violence and harassment) • Properties identified through reports and flagged in FLOW as high risk tenancies e.g. high rechargeable repairs , repeat offenders for missing gas servicing appointments and customers who have not contacted us for over 12 months
3.2	OVH will exclude tenants on starter tenancies from the program as issues are picked up through scheduled visits made during the first 12 months and property condition checks are part of this process. OVH also capture customer profile information at sign-up, which will be up-to-date within the first 12 months. Where a tenant on a starter tenancy refuses to engage with OVH, the case will be dealt with under the Starter Tenancy Policy.
3.3	OVH will also exclude tenants engaged in the Independent Living Service from the Tenancy Audit Programme as their needs and tenancy condition are assessed through detailed support plans and regular home visits managed by the Independent Living Officers (ILOs). Independent Living Officers will complete a Tenancy Audit Proforma if a customer is not engaging with the service and they think there are serious concerns about the tenant, through which OVH will provide them additional support or make referral to other agencies, if necessary.

3.4	Housing Management Issues
3.4.1	Tenancy Profile Information
3.4.1.1	OVH will gather and /or update specific profiling information on tenants in regard to equality and diversity strands in order to: • Understand customer requirements that will help provide services that are better suited to their needs i.e. providing information in alternative format or language • Target specific services at customers i.e. financial inclusion services and youth projects • Ensure that all tenants receive a fair and equitable service e.g. by comparing customer satisfaction across profiles
3.4.1.2	Where Tenancy Audits identify specific vulnerabilities or disabilities (i.e. visual impairment, hearing difficulty or mental health illness), OVH will update customer profile information in

the system and ensure that staff are aware of any service alterations to accommodate the customer's vulnerability.

3.4.1.3   In operating this Policy, OVH will comply with the principles of the General Data Protection Regulations (GDPR) and Data Protection Act, 2018 as specified in the OVH Data Protection Policy and will not disclose or share personal information with third parties unless there are legitimate reasons to do so.

3.4.2   **Under Occupation/Overcrowding**

3.4.2.1   Where tenants are found to be overcrowded, OVH will discuss alternative accommodation that may suit their needs and provide support where required.

3.4.2.2   Where there is under occupation of a property, OVH will aim to discuss with the tenant(s) about rehousing via sub-regional choice based lettings scheme (CBL) and encourage them to use a free web-based, National Home Swapper Service. OVH will also help under occupying tenants to make applications for Discretionary Housing Payments (DHP's) or Exceptional Hardship Fund Payments (EHFP's) if they are financially disadvantaged through Welfare Reform measures as set out in the Demand Incentive Policy.

3.4.3   Where safeguarding issues are identified, OVH Officers involved in the tenancy audits will raise any concerns with the nominated officers (Independent Living Manager and Independent Living Team Leaders) , and report to relevant safeguarding boards as set out in the OVH 'Safeguarding Adult' and 'Safeguarding Children' Policies.

3.4.4   The Neighbourhood Services Team, where necessary, will offer households referrals to internal and external support partners including but not limited to:

- OVH Independent Living Team
- OVH Community Safety Team
- OVH Community Safety Team
- Relevant Local Authority

3.5   **Stock Condition**

3.5.1   OVH will also carry out tenancy audits to gather information about the condition of our properties including gardens, where applicable.

3.5.2   Where urgent or emergency repairs are identified as part of tenancy audits, OVH Officers conducting the tenancy audits will raise jobs through the Customer Service Team. In general, tenants are responsible for reporting routine repairs to OVH via the Customer Service Centre.

3.5.3   Where it is identified that a repair is due to neglect or deliberate damage by tenants or other people visiting their home, OVH may issue tenancy warnings and carry out repair works that are rechargeable to the tenant or initiate possession proceedings. Each case will be considered on its merits and the decision will be at OVH's discretion based on known information and individual circumstances.

3.5.4	Rechargeable repairs will not be completed until payment for the repair has been received unless there is a risk to health and safety or further deterioration in condition of the property. For further information, please see OVH Repairs, Maintenance and Planned Works Policy.
3.5.5	OVH will use information gained from tenancy audits to inform product selection, service delivery and investment programmes where trends or patterns emerge.
3.5.6	Where tenancy fraud is identified, based on the information gathered, OVH will investigate the matter and decide on the most appropriate course of action in accordance with the Prevention of Social Housing Fraud Act, 2013, including making a referral to outside agencies.
3.6	**Access**
3.6.1	OVH will write to tenants whose properties have been identified for the Tenancy Audit Programme (as described in section 3.1) before the visiting date with an option to change the appointment, if not suitable.
3.6.2	Where access is denied, OVH will continue making attempts to contact the tenant through various means including: • Book a follow up visit • Send follow up warning letters after each visit that result in no-access (up to three visits) • Check customer profile information for any vulnerabilities and speak to other teams to find out who may have had any interaction with the tenant. • Make referrals to external agencies or advocacy groups where tenants are known to require additional support • Record any attempts to contact the tenant on relevant IT system i.e. Customer Relationship Management (CRM) system and FLOW. • Match properties for the Tenancy Audits Programme with other services i.e. the Annual Gas Servicing Programme appointments, where possible
3.6.3	Where no-access continues, OVH will consider the use of legal powers within the tenancy agreement to afford access by instigating its 'Suspected Abandoned Dwelling Procedure' if a Neighbourhood Service Officer believes there is significant risk to the occupants or the property. Each case will be assessed on its merits and any final decision to instigate legal action to gain access will be made by the Neighbourhood Service Manager.
3.6.4	If any property is suspected to be abandoned, OVH will deal with it in line with its Suspected Abandoned Property Procedure.
3.6.5	Where access is granted, OVH Officers will complete a tenancy audit, which will include the following: • Completing the Tenancy Audit Proforma • Discuss tenancy conditions and provide 14 days to rectify problems, if required. • Identify and make referrals for additional support needs

| | | • Collect evidence of the tenancy condition, if necessary (i.e. Photos scanned to FLOW system. |
| | | • Record details of interaction with the tenant on relevant IT system |

4	**Implementation**	

4.1   All One Vision Housing staff should have an awareness of the process and benefits of tenancy audits. The 'Neighbourhood Services' 'Independent Living' and 'Customer Access' teams are directly responsible for the implementation of this Policy. The Neighbourhood Services Team is responsible for tenancy audits within general needs stock. Tenancy Audits in Independent Living stock are carried jointly by a Neighbourhood Service Officer and an Independent Living Officer. Their role includes:

- Scheduling tenancy audits as efficiently as possible
- Updating IT System (i.e. CRM, FLOW) with tenancy audit responses
- Making the necessary referrals arising from tenancy audits – repairs, income management, Anti-Social Behaviour, Safeguarding etc.

4.2   To support the delivery of this Policy all Neighbourhood Services and Independent Living staff will receive Safeguarding Training.

4.3   Staff carrying out tenancy audits will follow the OVH Lone Working and Personal Safety Policy and Procedure.

5	**Performance**	

5.1   The Neighbourhood Services Managers will be responsible for ensuring that tenancy audits have been carried out on all property referrals.

5.2   The Neighbourhood Services Managers will produce a report, annually which will be shared with their team and submitted to the Executive Management Team (EMT).

6	**Consultation**	

6.1   Tenant Policy Review Group were consulted in the development of this Policy on 06/09/2018. All staff were also consulted in about the development of this Policy. .

7	**Review**	

7.1   The Policy will be reviewed every two years, from the date of the Executive Management Team (EMT)approval to ensure its suitability, adequacy and effectiveness or as required by issues that may come to light through operation of the Policy and its supporting procedures

8	**Equality Impact Assessment**	
8.1	Was a full Equality Impact Assessment (EIA) required?	Yes.

8.2	When was EIA conducted and by who?	The Initial EIA conducted by the Policy and Strategy Manager and Neighbourhood Housing Manager in 2012 is still valid for this version of the Policy.
8.3	Results of EIA	The use of alternative formats of communication will be necessary when conducting Tenancy Audits including: • Use of British Sign Language • Use of Language Line/ Interpretation Services Officers conducting Tenancy Audits must be aware of the sensitivities that can exist when asking tenants to disclose personal information e.g. disability status, religion or sexual orientation. Staff should be prepared to explain the reason for monitoring this data. Tenancy Audits for residents in Independent Living housing will be supported by Independent Living Officers (ILOs).

9 Scheme of Delegation

9.1	Responsible committee for approving and monitoring implementation of the Policy and any amendments to it	Executive Management Team
9.2	Responsible officer for formulating Policy and reporting to committee on its effective implementation	Operations Director-Housing Services
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Operations Director-Housing Services

10 Amendment Log

Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
27 September 2016	As per the Review Schedule.	See section 6.	• Inclusion of a revised approach to identification of properties to be included in the Tenancy Audit Programme (i.e. referrals and IT report. • Inclusion of how OVH will deal with issues identified

			through tenancy audit i.e. Tenancy Profile Information, Under occupation/Over occupation and Stock Condition • Inclusion of how OVH will deal with no-access issues during tenancy audits
18 September 2018	In line with the review schedule	See section 6	• The Policy makes the reference to GDPR and Data Protection Act 2018