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4 October 2024

Dear Mr Craig-Sharples

Self- Referral: Consumer Standards

Setting the Context

Following our conversation on the 16th September 2024 we write to formally to self-refer.

Tower Hamlets Homes (THH) was brought back in-house on 1 November 2023 following a decision by the Cabinet on 22 February 2023.

This followed a strategic review which identified the need to strengthen accountability to residents. It signalled the need for the Council to have more control and oversight under the new Consumer Standards and Building Safety Act.

Since bringing the ALMO back in house we have undertaken a major restructure which is the start of a transformation programme in response to the findings of the strategic review. This has led to the ALMO being fully integrated into the Council, creating a single resident-focussed division which aligns Housing and Asset Management functions to drive forward standards.

We have also carefully reviewed and commissioned independent stocktakes of the performance of our housing services to ensure we have a full understanding of the position which the Council inherited and the action we need to take.



Compliance Standards

To drive forward standards further, in February 2024 we commissioned Pennington Choice and Housing Quality Network (HQN) to provide independent assurance and assess our compliance against the Consumer Standards. The reports were finalised at the end of July and highlighted areas where we need to improve our compliance position.

From that commission, we have identified these areas to be non-compliant as set out below:

Safety & Quality Standard

- **Fire Risk Actions;** c2500 overdue Fire Risk Actions, of which 1132 are High Risk actions. Many of these are reliant on major works and there are mitigations in place while this important, complex work is progressed. The attached LBTH Annual return provides further detail as requested, following a request for further information.
- **Data Quality (Resident & Property);** data management around our Landlord Compliance and Asset Management activities requires improvement. We also need to improve the data we hold on our residents and then use this to deliver improved proactive services. This relates to moving asset data into one data system and better understanding of leasehold sub-letting to target and shape services.
- **Asset & Repairs Performance;** Our responsive repairs service performance requires improvement, particularly the way we manage Damp and Mould reports. We have 144 Damp and Mould cases and our monitoring process requires improvement. However, we monitor category one cases on a weekly basis, while processes are being improved. We also have around 2500 Decent Home Failures with our stock requiring substantial investment to reduce the current reactive demand on our repairs service.

Transparency, Influence and Accountability

- **Complaint Handling:** a need to improve our complaint handling performance and implement lessons learned and use resident insight to drive service improvements and put the resident at the heart of service design and delivery

Governance: Across all of the standards there is a recognition of the need to strengthen our Governance arrangements and oversight of key landlord activities including Building Safety and Landlord Compliance.

Improvement Plan Development

We have already started to respond to these areas undertaking improvements at pace alongside developing a robust improvement implementation plan, supported by Trowers Hamblins advising on the prioritisation of improvements to address the areas identified. This includes:

- **Asset Investment:** £140million of capital funding approved by Cabinet on 11th September 2024 to tender works to address Fire and Building Safety
- **Data:** We are implementing improvements across Property and Resident data including a new system to manage our asset data
- **Fire Safety:** At the time of the audit (date) we had overdue Fire Risk Assessments, we are now 100% compliant across our homes. For all remaining high-risk buildings, we have remediation plans in place and/or planned works which are being progressed
- **Compliance:** Programmes in place which have already improved our position in terms of outstanding Fire Safety actions and across Landlord Compliance
- **Resources:** We have appointed to key leadership roles across Strategic Asset Management, Fire Safety and Complaints services

A report to Cabinet in November will recommend the formation of a Housing Cabinet Sub-Committee and working group to strengthen our Governance arrangements and oversee delivery of our improvement implementation plan.

In July 2024, we submitted a Fire Remediation Survey (FRS) and in response you have requested further information on our submission. We have been working on our response and attached this to the letter for your consideration. It provides assurance around our current position and the progressive action planning being undertaken to remediate any areas of non-compliance.

In the spirit of co-regulation, we are bringing these matters to your attention and have already started work to improve our position and develop an improvement plan.

London Borough of Tower Hamlets is committed to ensuring the safety of our residents and complying with the Consumer Standards.

In addition to the identified issues with regards to meeting the required outcomes of the Consumer Standards, in the spirit of being open and transparent, there is an indication that we may not be compliant with the Rent Standard. We have recently commissioned Savills to provide assurance over our compliance and will share the findings of this work when it is completed.

Our lead officer for any discussions in relation to self-referral will be our Corporate Director for Housing and Regeneration, David Joyce. Please do not hesitate to contact them on david.joyce@towerhamlets.gov.uk.

We appreciate your support with this issue and look forward to working with you and to receiving your response to this letter.

Yours sincerely,



Stephen Halsey
Chief Executive

