







Cabinet

11th October 2023

Review of Intensive Housing Management Service

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Lead Member/Relevant Portfolio Holder	Councillor Pip Allnatt - Leader of the Council and Portfolio Holder for Housing and Landlord Services
Corporate Priority:	Providing high quality council homes and landlord services
Relevant Ward Member(s):	All
Date of consultation with Ward Member(s):	Not applicable
Exempt Information:	No
Key Decision:	Yes
Subject to call-in:	Yes

1 Summary

- 1.1 A review of the Council's Intensive Housing Management Service has been carried out. This report provides an update on the review and sets out a number of recommendations, including enabling tenants in dispersed accommodation who have confirmed that they wish to opt out of the service to do so. It also provides an update on the implementation of the revised support arrangements at Gretton Court, the Council's Extra Care Scheme.
- 1.2 Further consultation is required with sheltered housing residents, and residents in dispersed housing who have expressed that they wish to have access to support or

- access to lifeline services. A further report will be presented to Cabinet after this period of further consultation, setting out recommendations for future support arrangements.
- 1.3 This service review responds to previous audit recommendations and to tenant and member feedback. It has been a comprehensive review that has taken some time and seeks to clarify future service delivery whilst maintaining a focus on tenants needs and wishes.

2 Recommendation(s)

That Cabinet:

- 2.1 Note the findings of the review of the Intensive Housing Management Service (IHMS).
- 2.2 Authorise the removal of the IHMS charge for tenants in dispersed accommodation who have confirmed during the initial consultation phase that they wish to leave the service.
- 2.3 Authorise the removal of the IHMS charge for tenants in dispersed accommodation for any tenants who wish to opt out of the service.
- 2.4 Delegate to the Director for Housing and Communities in consultation with the Director for Corporate Services, authority to make arrangements to remove the IHMS charge and to determine the date from which the charge is removed.
- 2.5 Authorise a consultation exercise with the Council's Sheltered Housing tenants which provides tenants with options for assistive technology and future support arrangements and indicative costs, ensuring that any future model operates on a full cost recovery basis and;
- 2.5.1 To use the outcome of this consultation exercise to inform recommendations for future support arrangements for sheltered housing tenants, the outcome of which will be considered by Cabinet no later than January 2024.
- Authorise a consultation exercise with IHMS tenants within the Council's dispersed housing stock who have expressed a wish to access support or lifeline services, which provides tenants with options for assistive technology and future support arrangements and indicative costs, ensuring that any future model operates on a full cost recovery basis and;
- 2.6.1 To use the outcome of this consultation exercise to inform recommendations for future support arrangements for the Council's dispersed housing tenants, the outcome of which will be considered by Cabinet no later than January 2024.
- 2.7 Delegate authority to the Director for Housing and Communities in consultation with the Portfolio Holder for Housing and Landlord Services, to de-designate dispersed accommodation units where the IHMS charge is no longer being applied.
- Delegate authority to the Director for Housing and Communities in consultation with the Portfolio Holder for Housing and Landlord Services, authority to develop a local lettings plan to provide clarity on future letting arrangements for de-designated properties across the borough, ensuring alignment with the council's housing allocations policy.

3 Reasons for Recommendations

- 3.1 The Council is taking positive action to review its current practises and future service delivery options in relation to the IHMS service, whilst also allowing the autonomy of those who do not wish to have access to lifeline services or support, to be able to opt out.
- 3.2 The review of the Intensive Housing Management Service has been a comprehensive and complex exercise. A full review of the service across the Council's Extra Care, Sheltered and Designated Dispersed Housing stock has been required for some time. It has involved extensive work to fully understand the history, scope and delivery of the service and to consider future options, which best support tenants to retain their independence, but also ensure that the Council is confident it can comprehensively and financially deliver.
- 3.3 Initially the review has focussed on the dispersed properties with an IHMS designation attached. Formal consultation is needed with tenants who live in the council's sheltered schemes and those tenants in dispersed accommodation who have advised that they may be interested in receiving support in the future. Clarifying options, costs and recommendations is a necessary next step to allow tenants to make an informed choice.
- 3.4 The Council is now at a stage to conclude the review and to enable service changes to ensure clarity and effective service delivery, cost recovery and resilience. Careful consideration needs to be given to the most appropriate way to support tenants, ensuring at all times with any revised approach that regulatory requirements and tenants best interests are met.
- 3.5 At this point of the review, the Council needs to act on feedback from tenants within the council's dispersed housing stock who wish to opt out of the service. This needs to be carried out in a planned and managed way whilst progressing these changes quickly to minimise ongoing costs to tenants.
- 3.6 Formal consultation with sheltered housing scheme tenants and with those tenants within the council's designated dispersed housing stock who have expressed that they wish to access support or lifeline services, will enable officers to develop clear recommendations for future for consideration by Cabinet This consultation process will allow officers to determine what support is required by tenants and how this can best be delivered. Affordability, service quality and resilience will be key considerations.
- 3.7 Removing the IHMS charge from each individual dispersed tenancy where the tenant has identified that they wish to leave the service will mean that those properties are effectively 'de-designated' and will form part of the council's general needs accommodation rather than restricted accommodation. However, there is scope, through the use of a Local Lettings Policy (LLP) to restrict the allocation of some properties to applicants with defined characteristics, for example those over a certain age or with health needs or disabilities. The Council will need to balance the requirement to ensure sustainable and balanced communities across the borough with tenant expectations and the council's statutory obligation to house those in the greatest need via its housing register.

4 Background

- 4.1 In 2015, Leicestershire County Council withdrew financial support for Housing Related Support Services in Melton. To continue to provide support to local residents, this Council took the decision to implement a locally developed Intensive Housing Management Services, largely funded through charges to tenants together with a contribution from the Housing Revenue Account.
- 4.2 The IHMS model included access to support and a lifeline in addition to tenancy related support, and was applied to the council's extra care scheme, sheltered housing schemes and to specified units of dispersed accommodation (known as designated properties) across the Borough. For all IHMS properties across the council's housing stock, there is a service charge in addition to the rent charge.
- 4.3 An audit of the Council's Intensive Housing Management Service was carried out by the Council's Internal Audit Team in 2019/2020, leading to a limited assurance opinion for the control environment and satisfactory assurance for compliance. The audit outlined the need for a clear service plan or specification setting out the services provided or expected outcomes, greater clarity for staff and customers ad identified concerns regarding capacity and service resilience, and difficulty in demonstrating value for money. A number of individual recommendations were made, but Internal Audit colleagues noted that the Council may prefer to carry out a more fundamental service review.
- 4.4 An overarching recommendation was subsequently agreed. The audit made the following overarching recommendation:
- 4.4.1 Prepare a formal service specification or plan setting out the overall aims and objectives of the Intensive Housing Management Service (IHMS), expected outcomes and detailed description of the services provided. This should clearly distinguish between welfare and tenancy-based services and how they are delivered to maximise effectiveness and value for money.
- 4.5 In response to the audit, the Council committed to a full review of the service. This was delayed due to the need to focus on the Covid 19 response, the complete change of housing leadership team in 2021, and the need to prioritise action to address health and safety risks across the council's housing stock.
- 4.6 Since 2019, the Council has begun to proactively transform and improve its landlord services. Significant improvements have been made with many areas, demonstrating notable progress and drawing upon best practice. A new housing and communities directorate was established, including the creation of housing officer posts in 2019, ensuring that housing officers had specific patch / area responsibility. All housing stock covered by the Intensive Housing Management Service has a named housing officer, each covering specific geographical areas / patches.
- 4.7 This report presents the findings of the subsequent review and actions required.

5 Main Considerations

5.1 As part of the Council's HRA Business Plan, approved by Full Council in July 2022, a commitment to review the support offer to tenants was included:

8.1.17 Recommendations for supported housing

To progress a review of support available to tenants, including options regarding support and assistive technology to increase independence in the future.

- 5.2 Previous light touch reviews of the Council's Intensive Housing Management Service have been carried out but have not led to the clarity or transformation required. A full review commenced in 2023, led by the Assistant Director for Housing Management.
- 5.3 The review of the IHMS service has been split into three strands:
 - a) Extra Care: Gretton Court (44 properties)
 - b) Sheltered Housing Schemes (71 properties)
 - c) Designated Dispersed Accommodation Units (567 properties)
- Under the current arrangement, any person living within the 3 designations above is automatically subject to the IHMS charge, which varies depending on which type of category they are in. The proposals and considerations below seek to refresh and update this approach based on feedback received.
- 5.5 An update on each strand, including key considerations from the review undertaken is set out below:
- Gretton Court: Work on a revised support offer for the Council's Extra Care Scheme, Gretton Court, commenced in 2022 and a report on revised support arrangements was considered by Cabinet in July 2023. It focussed on the need to implement revised support arrangements for tenants, including to create an ongoing wellbeing service in response to the withdrawal of a previous Wellbeing Offer commissioned by Leicestershire County Council. Consultation has been undertaken with the tenants and their relatives and carers to understand what their requirements and expectations would be for a new wellbeing service. These have been included in the new service model, agreed by Cabinet. For Gretton Court, this is the amalgamation of housing support functions and wellbeing support, which will be delivered through the appointment of a full time, on-site Independent Living Officer.
- 5.7 The report was presented to the Cabinet on 19 July 2023. At the meeting, Cabinet resolved the following:
- 5.7.1 Approved the introduction of a Wellbeing Offer provided by Melton Borough Council to residents of Gretton Court, funded through a service charge arrangement, noting that the entertainment budget will be used flexibly by officers to support general operational and resident requirements.
- 5.7.2 Agreed that authority be delegated to the Director for Housing and Communities to enter into the necessary actions to implement the new service including the associated charge.

- 5.7.3 Agreed that a formal review takes place no less than three months after the implementation of the revised wellbeing offer.
- 5.8 Recruitment to the post of Independent Living Officer is underway and consultation has taken place with residents ahead of the associated charges and service arrangements being implemented.
- 5.9 Ensuring a sense of community and clarity of roles and responsibilities between the council and the on-site care provider (Diamond Home Care) continue to be key considerations.
- 5.10 Subject to any changes arising from the three-month review of the revised arrangements at Gretton Court, this aspect of the wider Intensive Housing Management Review is considered complete.
- 5.11 <u>Sheltered Housing Schemes:</u> Tenants in the three sheltered housing schemes are some of our more vulnerable residents.
- 5.12 Sheltered housing tenants continue to receive support in a number of ways, including lifelines installed in their properties to access emergency support, receiving a welfare check seven days a week and on-site presence of officers during the week.
- 5.13 Recruitment and retention challenges in the IHMS service have required the redeployment of the Senior Housing Officer to provide oversight and support to the sheltered housing schemes alongside the Intensive Housing Management Officer and housing officers, whilst a review has been undertaken.
- 5.14 The current support and staffing arrangements at the sheltered schemes cannot be sustained. Challenges include recruitment and retention of staff, a lack of clarity on service scope and performance, limited-service resilience and a need to review costs to ensure any service is affordable to tenants and the council. Focussed consultation is required with sheltered housing tenants to understand customer expectations and to identify options to meet their needs in the future. The commencement of formal consultation with residents of these schemes will enable officers to determine appropriate and affordable future support options, for consideration by Cabinet before January 2024.
- 5.15 Any future support arrangements for tenants in sheltered schemes must ensure that tenants are supported in the right way at the right time, supporting them to live independently, whilst also ensuring that the service provided is resilient, affordable and that costs are fully recovered through services charges.
- 5.16 Should Cabinet authorise a consultation exercise with the Council's Sheltered Housing tenants, officers will consult with tenants on the following options:
 - Face to face support / type and frequency
 - Access to digital lifeline services (including daily welfare checks)
 - Alternative housing or support options
 - o Future designation arrangements
 - o Opting out of the service (subject to being assured that needs can be met in other ways)
- 5.17 The costs and implications arising from this will be discussed with tenants, any the ongoing demand for any future service assessed. Where appropriate, alternative options

- for meeting tenant needs (for example, care package / access to third party support) would also be assessed.
- The proposed period of consultation with sheltered housing scheme residents is 4 weeks, during which time officers will hold open meetings at each of the courts, and then survey tenants to understand their wishes and preferences. Feedback from the consultation exercise will be provided to Cabinet, alongside consideration of options and associated costs, and recommendations for future support arrangements. An Equality Impact Assessment will be undertaken.
- 5.19 <u>Designated Dispersed Housing</u>: Tenants in designated dispersed housing can have access to lifeline and support with welfare and tenancy related matters. As part of the review, contact has been attempted with all 567 customers on several occasions and responses have been received from 96% tenants, with the remaining 4% being contacted again. Engagement has included letters and questionnaires, telephone calls, face to face meetings, follow up calls and visits to those who had not responded to the review. Tenants were asked for their preferences about support in the future, asking them if they wished to:
 - Leave / opt out of the service.
 - o Just have access to a lifeline.
 - Have access to ongoing periodic support.
- The outcome of this initial engagement exercise has shown that there was a lack of clarity about what the IHMS should include, a level of dissatisfaction with the service and over 54% tenants told us that they do not wish to receive the IHMS service, or wish to have access to a lifeline only, in the future.
- 5.21 The outcome of engagement exercise at the time of writing the report:
 - Leave / opt out of the service (265)
 - Just have access to a lifeline (56)
 - Have access to ongoing periodic support (221)
- 5.22 Based on this feedback, the following is proposed:
- 5.22.1 For IHMS customers in dispersed accommodation who have expressed a wish to leave the service: It is proposed that these customers are supported to do so in a safe and managed way. This will mean removing the associated IHMS charge for those customers and requesting that each customer signs a statement to confirm they no longer wish to have access to the service or a lifeline service. It is proposed to begin to remove the charge during November 2023, which is the first point at which this can be removed to allow for rent account and housing benefit adjustments after the cabinet decision. There are some associated practical requirements, including to make changes to the tenancy agreement and to seek assurance that tenants fully understand the implications of opting out of having access to support and lifeline services.

- 5.22.2 For IHMS customers in dispersed accommodation who have expressed that they wish to have access to a lifeline only: it is proposed to support these customers, on a case-by-case basis to access a digitally enabled lifeline option (a requirement due to the national digital switchover in 2025). Customer choice will be important as there are various lifeline models available including the council's private lifeline service and services delivered by third parties. Customers will need to pay for Lifeline services. In the interim, those tenants would continue to pay the IHMS charge.
- 5.22.3 For IHMS customers in dispersed accommodation who have expressed that they wish to have access to support: A period of consultation is proposed to assess what support is required by tenants, and how this can best be delivered (and by who). Officers will meet with each tenant individually, to discuss their support needs, and how they can best be met, and share indicative costs. Any future support arrangements for tenants across the council's dispersed housing stock must ensure that tenants are supported in the right way at the right time, supporting them to live independently, whilst also ensuring that any service provided is resilient, affordable and that costs are fully recovered.
- 5.22.4 Should Cabinet authorise a consultation exercise with these tenants, officers will consult with tenants on the following:
 - face to face support (type / frequency)
 - access to digital lifeline services
 - alternative housing or support options
 - opting out of the service
- 5.23 The costs and implications arising from each support option will be discussed with tenants, and the ongoing demand for any future service assessed. Where appropriate, alternative options for meeting tenant needs (for example, care package / access to third party support) would also be assessed.
- 5.24 For access to digital lifeline services provided by the council, current lifeline costs are £5.77 plus VAT and falls pendant £8.43 per week. This is a general fund service. It is important to note that the council is not the only provider of lifeline services, other providers costs vary. Information about different lifeline / assistive technology options will be shared with tenants.
- 5.25 Initial modelling suggests that an hourly cost for a visiting council officer is £37.22. Given the need for cost recovery and the specialism of providing a support service, it is possible that as an outcome of this consultation, it is not affordable or appropriate for the council to offer an IHMS service to tenants in dispersed accommodation in future. If this is the case, this will be detailed in a further Cabinet report with a proposed transition plan for each tenant. It is important that any future support arrangements are person centred they must align to the needs of the customer, rather than being a requirement of living in a particular dispersed property.
- 5.26 The proposed period of consultation with these dispersed housing tenants is 6 weeks, during which time officers will arrange to meet with all tenants directly. Feedback from the consultation exercise will be provided to Cabinet, alongside consideration of options and

associated costs, and recommendations for future support or transitional arrangements. An Equality Impact Assessment will be undertaken.

6 Options Considered

- 6.1 Option 1 Do Nothing: The IHMS service requires change and improvement. The lack of clarity and ability to evidence service quality exposes the Council to risk and challenge, and the council cannot be confident that it is meeting the needs or expectations of customers. Doing nothing would also fail to respond to the audit recommendations and to tenant and Councillor feedback about the service. This option is not recommended.
- Option 2 Based on the numerical responses from IHMS customers in dispersed units so far, to design, model and cost a new IHMS service to consult on: Full cost recovery of the service would be required. Implementing a revised service attached to dispersed properties without further consultation to inform service options and design, would not enable a person focused approach and would not respond to tenant feedback. Further work is required to help tenants to make informed choices about future support. Therefore, this option is not recommended.
- 6.3 Option 3 To take an incremental approach, allowing those tenants who wish to opt out of the service to do so, whilst also undertaking separate consultation exercises with a) sheltered housing tenants and b) designated dispersed housing tenants, to determine options for future support arrangements. Alongside this, to ensure that any de-designation arrangements are accompanied by a local letting plan to provide clarity on future allocations and property eligibility: This option is recommended and a proposed approach to the consultation exercise in the report.

7 Consultation and Engagement

- 7.1 Consultation and engagement has taken place in a number of ways, with more formal consultation activity to follow as set out in the report. Each aspect is set out below.
- 7.2 Consultation and engagement activity **so far**:

7.2.1 <u>Gretton Court Tenants</u>

- Initial consultation and engagement with Gretton Court residents, and their families to inform future proposals. Carried out alongside Leicestershire County Council.
- Continued consultation and engagement with Gretton Court residents prior to the implementation of changes to service delivery and associated charges.
- Interviews for Independent Living Officer (Gretton Court) to take place at Gretton Court itself to allow for consideration of interaction with residents as part of the selection process.
- Further open meetings at Gretton Court to update on progress, implement the service charge and appraise how the new service is being implemented.

7.2.2 Sheltered Housing Tenants

Whilst a review of service delivery has been undertaken, no direct consultation has been undertaken with the tenants of our 3 sheltered housing schemes at this stage. This is proposed as a next action as set out in the report.

7.2.3 <u>Designated Dispersed Housing Tenants</u>

As set out in the report, feedback has been received from 96% IHMS customers in designated dispersed housing across the borough. Officers continue to contact the remaining customers. Engagement has included face to face meetings, letters and questionnaires, telephone calls, and follow up calls to those who had not responded to the review. Tenants were asked for their preferences about support in the future. The recommendation to remove the IHMS charge for those tenants who wish to opt out of the IHMS service is a direct outcome of this initial engagement activity, with formal consultation activity proposed as a next step for customers who wish to access support in the future. It is also important to note that at this stage, tenants have the option to change their mind.

7.2.4 Engagement with Councillors

- Feedback has been received from some ward councillors on behalf of residents in some designated dispersed housing properties expressing a wish to have the IHMS charge removed. There is currently a lack of clarity regarding the designation of properties and a desire to have a clear and effective service in place which this review, report and recommendations is seeking to facilitate.
- Quarterly 'drop in' meetings for councillors are hosted by the Assistant Director for Housing Management. Progress updates on the IHMS review have been shared as part of these meetings.

7.2.5 Engagement with Tenant Representatives

• The need to progress and conclude the IHMS review has been expressed frequently at recent tenant engagement meetings (Your Choice).

7.3 **Planned** consultation and engagement activity:

7.3.1 Gretton Court Tenants

In line with the recent decision taken by Cabinet, a review of the revised support arrangements (Wellbeing Offer) at Gretton Court will be carried out no less than three months after implementation of the revised support arrangements. This will involve tenants, their families, ward members, representatives of the Friends of Gretton Court, Leicestershire County Council and the commissioned care provider, Diamond Home Care.

7.3.2 Sheltered Housing Tenants

- As set out in the report, a formal consultation exercise is proposed with sheltered housing tenants. This will help to determine future offer and inform costing / service proposals. Future options will be presented to Cabinet for consideration. Should Cabinet authorise a consultation exercise with the Council's Sheltered Housing tenants, officers will consult with tenants on the following:
 - face to face support (type and frequency)
 - access to digital lifeline services (including daily welfare checks)
 - alternative housing or support options
 - future designation arrangements
 - opting out of the service (subject to being assured that needs can be met in other ways)
- The costs and implications arising from this will be discussed with tenants, and the ongoing demand for any future service assessed. Where appropriate, alternative options for meeting tenant needs (for example, care package / access to third party support) would also be assessed.

7.3.3 <u>Designated Dispersed Housing Tenants</u>

- As set out in the report, a formal consultation exercise is proposed with tenants of designated dispersed accommodation units who have expressed a wish to continue to access lifeline and / or support services. This will help to determine any future offer and inform costing / service proposals for consideration by Cabinet.
- Should Cabinet authorise a consultation exercise with these tenants, officers will consult with tenants on the following:
 - face to face support (type / frequency)
 - access to digital lifeline services
 - alternative housing or support options
 - opting out of the service
- The costs and implications arising from this will be discussed with tenants, and the ongoing demand for any future service assessed. Where appropriate, alternative options for meeting tenant needs (for example, care package / access to third party support) would also be assessed.

7.3.4 Engagement with Councillors

- Councillors are encouraged to continue to attend the quarterly drop-in meetings, where updates on the work of the council's housing team and progress on the review will be shared.
- Councillors will also be made aware of any IHMS focussed consultation events or activities taking place directly in their wards.

- It is proposed that an informal member reference group be established to work with officers and the Portfolio Holder for Housing and Landlord Services to review findings from the consultation undertaken with sheltered and dispersed housing tenants and to support in developing appropriate recommendations for future support arrangements.
- Ward councillors will be invited to be part of the three-month review of Wellbeing Service arrangements at Gretton Court alongside the Portfolio Holder for Housing and Landlord Services.

7.3.5 **Engagement with Tenant Representatives**

The Council has a range of ways in which it communicates with tenants, including through the Your Choice Group. Officers will continue to engage with tenants, an update on the IHMS review is a standing item on the Your Choice tenants meeting agenda.

Next Steps – Implementation and Communication 8

- 8.1 Subject to Cabinet approval, consultation will commence with sheltered housing tenants (4-week period) and IHMS customers within designated dispersed housing units who have expressed a wish to retain access to lifeline and / or support (6-week period).
- 8.2 A person-centred approach will be taken to the consultation, ensuring that residents are supported to understand the various support options available to them including access to support provided by other organisations, options to directly commission care and to access welfare benefits, access to social care support, and information about alternative housing options if applicable and appropriate to the customers circumstances.
- 8.3 The table below provides an indicative timeline for the review and next steps as we approach the formal consultation:

Stages	Description	Milestone Dates	
Approvals	Business Case SLT approval	26 September 2023	
to Proceed	Formal decision at Cabinet	11 October 2023	
Project	Project Kick Off Workshop	14 October 2023	
Initiation and Planning	Project Charter approval 22 November 2023		
Project Deli	 very		
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Gretton Court	Independent Living Officer recruited. Signed Deeds of Variation complete. Rent accounts amended.	Dependent on recruitment (recruitment underway)	
Sheltered Housing Schemes	Consultation meeting held at each of the 3 courts to explain the process and options to tenants.	October 2023	
		November 2023	

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	A survey of every tenants to ascertain their wishes and preferences.	December 2023
	Review of consultation findings.	17 th January 2024
	Recommendations to cabinet.	
Dispersed IHMS tenants	Remove charge where customers in dispersed stock have already said they no longer want the service (c300 customers) – action also to include deed of variation and safeguarding statement completed.	November 2023
	Consultation with those who wish to receive lifeline and / or support.	November / December 2023
	Review of consultation findings.	December 2023
	Recommendations to cabinet.	17 th January 2024
	For those who wish to retain access to lifeline services, support to transition to preferred provider.	March 2024
Local Lettings Policy	For properties that are de-designated as a result of this review, to develop a local lettings policy to provide clarity on eligibility and allocations arrangements.	December 2023, and updated to include any additional properties that are de-designated through the IHMS review process.
HRA budget and rent setting proposals for 24/25	Paper to budget scrutiny to be accompanied by details of recommendations approved by cabinet, in order to inform budget setting process.	Budget scrutiny 25 th January 2024
	Recommendations on budget and rent setting to council	Cabinet 7 th February
	Council consideration of 24/25 budget including rent setting	Council 8 th February
	Rent debt raised for 24/25 period and Housing Benefit applied. Issue of notification letters to tenants	February 2024

9 Financial Implications

- 9.1 The current weekly charge for the IHMS service is £13.60 for sheltered housing tenants and £6.19 for tenants in designated dispersed accommodation units. Where an increase has been applied, this has been in line with inflation. The charge was not increased in 2020/2021, 2021/2022 or 2022/2023.
- 9.2 Initial modelling suggests that an hourly cost for a visiting council officer is £37.22. Given the need for cost recovery and the specialism of providing a support service, it is possible that as an outcome of this consultation, it is not affordable or appropriate for the council to offer an IHMS service to tenants in dispersed accommodation in future.
- 9.3 Removing the charge from November 2023 for the 265 dispersed housing tenants who have so far confirmed a wish to opt out of the service will reduce income to the council by approximately £35,000 in the current financial year. This income shortfall can be funded from the existing staff vacancies; however, this is dependent on them not being filled. If further tenants opt out of this service and have the charge removed, then only another 64 'opt out' arrangements can be funded in this way. This available funding is also reliant on the recruitment of the Independent Living Officer at Gretton Court to allow that charge to commence as currently the cover for some of this service is being taken from these salary savings.
- 9.4 The ongoing full year impact of the removal of these charges in any given year cannot be quantified until the full-service offer and costs are ascertained. The council must adjust its costs accordingly when the details are known.
- 9.5 In removing the IHMS charge for customers who wish to opt out of the IHMS service, care must be taken to align changes to housing benefit claims to avoid overpayments to tenants.
- 9.6 For the purposes of rent setting for 23/24, and in anticipation of the review of the IHMS service, the Council applied a 7% rent increase to dispersed accommodation (rather than the inflationary increase permitted for supported housing). A further consideration is that whilst the Government imposed a rent cap, the Council was able to increase the rent for its supported tenancies in excess of that set amount. Consideration needs to be given to any de-designation of properties, as it could impact future rental income to the council if similar rent caps are applied at a national level.
- 9.7 Clarity regarding future support arrangements is required to inform budget setting and cost recovery arrangements.

Financial Implications reviewed by: Director for Corporate Services (Section 151 Officer)

10 Legal and Governance Implications

10.1 Further to the audit of the IHMS service, the need for a full review remains on the internal audit tracker. As a high priority and overdue recommendation, close attention is being given to progress on this work by the audit committee with updates being provided to the committee at every meeting. Positive progress has been made, but there is a need to progress and conclude the consultation activity proposed to allow for recommendations to be considered by Cabinet. When the review has concluded with final recommendations considered by Cabinet and implemented, a final update will be provided to audit committee.

- The Council's HRA Business Plan is clear on its commitment to progress a review of support available to tenants, including options regarding support and assistive technology to increase independence in the future. The Business Plan was approved by Council in July 2023 and the IHMS review remains in line with this commitment.
- 10.3 The IHMS service is assessed as a high risk on the Housing and Communities directorate risk register.
- 10.4 The IHMS review project is being managed as a corporate project as part of the Council's project management arrangements. This should continue, to ensure corporate oversight and accountability.
- 10.5 Consultation with tenants will form a key part of any decision making and any proposed changes will need to be in accordance with relevant legislation (mainly the Housing Act 1985).
- 10.6 Consideration will also need to be given to any contractual obligations the Council currently has with external contractors.

Legal Implications reviewed by: Senior Solicitor

11 HR Implications

- 11.1 There are currently 3.79 IHMS officers and 0.7 of a team leader post within the existing establishment. Currently there is one IHMS officer in post working 4 days per week, (0.8FTE) with additional cover being provided across the wider housing team, including the deployment of the senior housing officer to provide direct support and oversight.
- 11.2 When the outcome of the proposed consultation and future service arrangements is known, HR colleagues will advise on any associated staffing implications and changes to the establishment arising.
- 11.3 The report is clear that ongoing reduction in income must be mitigated through changes to the establishment.
- 11.4 Whilst the consultation is ongoing it is proposed to freeze 3 FTE IHMS Officers and 0.7 Team Leader posts within the establishment.
- 11.5 HR colleagues will be represented on the internal project management group.
- 11.6 Should any implications arise, employees and unions will be consulted on throughout the process and all usual HR policies and procedures will be followed.

12 Equality and Safeguarding Implications

- 12.1 The next report to Cabinet will include details of any implications arising from the Equality Impact Assessment to accompany recommendations made about future support arrangements.
- 12.2 The Council has contacted 96% IHMS customers across its designated dispersed housing stock to understand their preferences for future support arrangements Before removing the IHMS charge and associated access to support and lifeline services for those customers who have confirmed a wish to opt out of the service, customers will be asked to sign a statement to confirm their understanding.

- 12.3 A person-centred approach is required, ensuring that residents are supported to understand the various support options available to them including access to support provided by other organisations, options to directly commission care and to access welfare benefits, access to social care support, and information about alternative housing options if applicable and appropriate to the customers circumstances.
- 12.4 If at any point during the consultation period any safeguarding or welfare concerns are identified, onward referrals must be made to appropriate organisations.
- 12.5 Care must be taken to ensure that where properties are de-designated, there are clear and effective allocation arrangements. Removing the IHMS charge from each individual dispersed tenancy where the tenant has identified that they wish to leave the service will mean that those properties are effectively 'de-designated' and will form part of the council's general needs accommodation rather than restricted accommodation. The proposed Local Lettings Policy will be an important safeguard to ensure appropriate future allocation of properties, for example, to restrict the allocation of some properties to applicants with defined characteristics, for example those over a certain age or with health needs or disabilities. The Council will need to balance the requirement to ensure sustainable and balanced communities across the borough with tenant expectations and the council's statutory obligation to house those in the greatest need via its housing register.
- 12.6 Given the need for cost recovery, it is possible that as an outcome of this consultation, it is not affordable or appropriate for the council to offer an IHMS service to tenants in dispersed accommodation in future. If this is the case, this will be detailed in a further Cabinet report with a proposed transition plan for each tenant. It is important that any future support arrangements are person centred they must align to the needs of the customer, rather than being a requirement of living in a particular dispersed property.

13 Data Protection Implications (Mandatory)

13.1 The Council holds personal and financial information about its tenants. This will be treated in line with data protection requirements at all times. Advice will be taken from the Council's Information Governance Lead in relation to the project.

14 Community Safety Implications

14.1 None arising directly from this report.

15 Environmental and Climate Change Implications

15.1 None arising directly from this report.

16 Risk and Mitigation

16.1 The IHMS Service is assessed as high risk on the Housing and Communities Directorate Risk Register. The review seeks to address the risk and improve service clarity and delivery in the future.

- 16.2 The IHMS review is being managed as a corporate project and as part of that, a risk log is being maintained.
- 16.3 The risks outlined below are specific to the current report:

Risk Number	Risk Description	Likelihood	Impact	Risk Rating
1	Unable to demonstrate effective response to audit recommendations	4	2	Medium
2	Unable to demonstrate timely response to audit recommendations	4	3	Medium
3	Unable to remove IHMS charge for confirmed 'opt out' customers during November 2023	2	3	Low
4	Housing benefit implications arising from removal of IHMS charge	3	3	Medium
5	Consultation process is not clear, robust or effective in enabling customers to express their wishes regarding future support arrangements	4	3	Medium
6	Recommendations for future support arrangements are not robust or evidence based	3	3	Medium
7	Requirement for full cost recovery makes a future support arrangement unaffordable (to tenants and / or the council)	5	3	High
8	Unable to transition effectively to digital lifeline arrangements	3	3	Medium
9	De-designation of dispersed properties without alternative arrangements leads to lettings that do not support community cohesion or stability	4	4	Medium

10	Customer dissatisfaction with the service results in complaints or additional costs	5	3	High
11	Not achieving project milestones	3	4	Medium
12	Cost of removing the charge is not covered by ongoing savings within the service leading to greater pressure on the HRA	4	3	Medium

		Impact / Consequences			
		Negligible	Marginal	Critical	Catastrophic
	Score/ definition	1	2	3	4
	6 Very High				
-	5 High			7, 10	
Likelihood	4 Significant		1	2, 5, 9, 12	
=	3 Low			4, 6, 8	11
	2 Very Low			3	
	1 Almost impossible				

Risk No	Mitigation
1	Unable to demonstrate effective response to audit recommendations: Clear IHMS review plan and project management arrangements now in place, regular updates to the audit committee and audit tracker being updated. As a high priority and overdue action, close attention is being paid to the progress being made. Changes to support arrangements at Gretton Court have been approved

	and implementation underway. Directorate risk register continues to document the IHMS service review as a key risk area.
2	Unable to demonstrate timely response to audit recommendations: In response to the audit, the Council committed to a full review of the service. This was delayed due to the need to focus on the Covid 19 response, the complete change of housing leadership team in 2021, and the need to prioritise action to address health and safety risks across the council's housing stock. Since 2019, the Council has begun to proactively transform and improve its landlord services. Significant improvements have been made with many areas, demonstrating notable progress, and drawing upon best practice. A new housing and communities directorate was established, including the creation of housing officer posts in 2019, ensuring that housing officers had specific patch / area responsibility. All housing stock covered by the Intensive Housing Management Service has a named housing officer, each covering specific geographical areas / patches. Specific interim support arrangements have been in place for the sheltered hosing schemes. Progress updates have been provided to audit committee on a regular basis. Key focus now is to maintain the project timeline. A closure report is proposed as an important final update to the audit committee.
3	Unable to remove IHMS charge for confirmed 'opt out' customers during November 2023: This date has been agreed operationally as the first date at which the charge can be removed after the Cabinet decision to remove the charge for confirmed opt out customers, further to conclusion of the initial engagement phase. Operational arrangements to enable this have been agreed between teams and details of relevant addresses provided.
4	Housing benefit implications arising from removal of IHMS charge: Linked to number 3. Operational processes agreed to ensure relevant changes made to rent accounts and housing benefit claims simultaneously, to reduce the risk of housing benefit overpayments.
5	Consultation process is not clear, robust or effective in enabling customers to express their wishes regarding future support arrangements: The consultation process will be led by the Assistant Director for Housing Management. Consideration is being given to the most effective way to engage with tenants including face to face meetings, direct discussions with tenants and follow up surveys. A person-centred approach is required to help customers understand options, cost implications and alternatives. The lack of clarity on the current service model and associated costs may create some additional difficulties in the consultation process. These will be managed on a case-by-case basis. Ward councillors will be made aware of consultation meetings taking place in the sheltered schemes. If residents wish to be accompanied in any discussions relation to the consultation, they will be able to do so.
6	Recommendations for future support arrangements are not robust or evidence based: It is imperative that when Cabinet are asked to consider future support arrangements, they have the information and evidence base to support them to make informed decisions. The recommended approach enables this. The final report will be accompanied by an equalities impact assessment. It is proposed that an informal member reference group be established to work with officers and the Portfolio Holder for Housing and Landlord Services to review findings from the consultation undertaken with sheltered and dispersed housing

	tenants and to support in developing appropriate recommendations for future
	support arrangements.
7	Requirement for full cost recovery makes a future support arrangement unaffordable (to tenants and / or the council): initial modelling suggests that for a single visit, the cost will be much higher than the current IHMS service charge. The costs and implications arising from this will be discussed with tenants, and the ongoing demand for any future service assessed. Where appropriate, alternative options for meeting tenant needs (for example, care package / access to third party support) would also be assessed. Options regarding frequency and types of support available will form part of the consultation. If the outcome of the consultation is that there is not an affordable support solution available, alternative proposals will be clearly set out the final cabinet report. A focus on ensuring the right solution for each tenant will be maintained.
8	Unable to transition effectively to digital lifeline arrangements: The need to prepare for the digital switchover presents a timely change for customers in the context of the review. The Council operates a private lifeline service, and transitional arrangements have been agreed between teams for customers who wish to transition to this service. Officers recognise that customer choice is an important factor and will make residents aware of alternative lifeline / assistive technology service providers and can support them to transition to these services on a case-by-case basis. Irrespective of provider, customers will need to pay for lifeline services.
9	De-designation of dispersed properties without alternative arrangements leads to lettings that do not support community cohesion or stability: Removing the IHMS charge from each individual dispersed tenancy where the tenant has identified that they wish to leave the service will mean that those properties are effectively 'de-designated' and will form part of the council's general needs accommodation rather than restricted accommodation. Through the use of a Local Lettings Policy, it is proposed to restrict the allocation of some properties to applicants with defined characteristics, for example those over a certain age or with health needs or disabilities. The Council will need to balance the requirement to ensure sustainable and balanced communities across the borough with tenant expectations and the council's statutory obligation to house those in the greatest need via its housing register. The recommendation in relation to this is linked to a delegated decision, in consultation with the Portfolio Holder.
10	Customer Dissatisfaction with the IHMS service: The review seeks to respond to customer feedback and concerns, and engagement with tenants has formed a key part of the process so far. The current report requests authority to remove the IHMS charge for those customers who have confirmed a wish to opt out of the service and sets out how this will be managed. Any individual complaints about the IHMS service will be dealt with on a case-by-case basis in line with the council's customer feedback and complaints policy.
11	Not achieving project milestones : The IHMS project is now being managed as a corporate project, giving it corporate oversight and accountability. Any deviation from the project timeline would be discussed and challenged through this process.
12	Cost of removing the charge is not covered by savings within the service: When the outcome of the proposed consultation and future service arrangements is known, HR colleagues will advise on any associated staffing

implications and changes to the establishment arising. The report is clear that ongoing reduction in income must be mitigated through savings or changes to the establishment.

17 Background Papers

- 17.1 Cabinet Report: Gretton Court Wellbeing Service
- 17.2 Choice Based Letting and Housing Allocations Policy
- 17.3 HRA 30 Year Business Plan
- 17.4 Internal Audit Report and Audit Tracker
- 17.5 Corporate Business Case
- 17.6 Record of designated dispersed accommodation units
- 17.7 Customer feedback and complaints policy

18 Appendices

18.1 None