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Agenda for Housing Review Board
Thursday, 30th January, 2025, 10.00 am

Members of Housing Review Board
A Bailey, C Burhop, S Chamberlain (Chair), M Martin, S Smith (Vice-Chair), S Clake, R Robinson, J Brown, T Dumper, R Browne and R Dale

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Venue: Council Chamber, Blackdown House, Honiton, EX14 1EJ

Contact: Alethea Thompson;
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(or group number 01395 517546)
Tuesday, 21 January 2025

1 Minutes of the previous meeting (Pages 3 - 10)

2 Apologies

3 Declarations of interest

Guidance is available online to Councillors and co-opted members on making declarations of interest

4 Public speaking

Information on public speaking is available online

5 Matters of urgency

Information on matters of urgency is available online

6 Confidential/exempt item(s)

To agree any items to be dealt with after the public (including the press) have been excluded. There are no items which officers recommend should be dealt with in this way.

7 Housing Review Board forward plan (Pages 11 - 12)

8 Housing Service staffing update

Verbal staffing update.

9 Housing finance report (Pages 13 - 28)

10 Electrical compliance audit (Pages 29 - 32)

11 Housing performance report - quarter 3 (Pages 33 - 44)

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Members of the public exercising their right to speak during Public Speaking will be recorded.

Decision making and equalities

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EAST DEVON DISTRICT COUNCIL

Minutes of the meeting of Housing Review Board held at Council Chamber, Blackdown House, Honiton, EX14 1EJ on 7 November 2024

Attendance list at end of document
The meeting started at 10.15 am and ended at 12.55 pm

17 Minutes of the previous meeting

The minutes of the meeting held on 1 August 2024 were agreed.

At the start of the meeting the Chair welcomed new tenant representative members Rachel Browne and Rosie Dale to the meeting. Subject to formal co-option by Full Council on 4 December 2024 they would become new tenant members on the Housing Review Board. She also welcomed newly appointed district councillor Jenny Brown onto the Board. There remained another district councillor vacancy which would be filled shortly.

Members questioned when pre-briefings for Board members (minute 8, 1 August 2024 refers) would take place. The Director for Health and Housing responded that the earlier presentation from Currie and Brown was an example of this and that the Scrutiny Improvement Plan was in the process of being delivered. All member briefings across the Council were also about to commence, which were likely to cover housing related matters at times.

A request was made for 'matters arising' to be added to future Housing Review Board agendas.

18 Declarations of interest

Declarations of interest.
Councillor Aurora Bailey, Affects Non-registerable Interest, Tenant of East Devon District Council.

Declarations of interest.
Councillor Brian Bailey, Affects Non-registerable Interest, Tenant of East Devon District Council.

Declarations of interest.
Councillor Jenny Brown, Affects Non-registerable Interest, Member of Honiton Town Council.

Declarations of interest.
Councillor Sarah Chamberlain, Affects Non-registerable Interest, Employed by Exeter City Council in the housing department.

Declarations of interest.
Councillor Steve Gazzard, Affects Non-registerable Interest, Tenant of East Devon District Council.

Declarations of interest.
Rob Robinson, Affects Non-registerable Interest, Tenant of East Devon District Council.

19 Public speaking

There were no members of the public registered to speak.

20 Matters of urgency

There were none.

21 Confidential/exempt item(s)

There were none.

22 Housing Review Board forward plan

The Director – Housing and Health presented the forward plan and advised members that the forward plan acted as a reminder of agenda items to come forward to future meetings. The forward plan had been derived from previous meetings and requests, as well as the housing service plan. Service managers were currently reviewing realistic timeframes against each topic. Members were reminded that they could add further reports and topics for discussion to the next forward plan by either informing herself or the Democratic Services Officer.

The Director for Health and Housing asked the Board if the forward plan was demonstrating the type of work plan that they would like to see. She also asked for suggestions from the Board about how additional briefing sessions could be phased into the forward plan and asked for guidance from Members on how they would like officers to do this. It was suggested that an online session be arranged for the Board within the next few weeks to discuss the Housing Review Board forward plan and programming of briefings.

Other items discussed and added to the forward plan:

- An update on the stock condition survey – it was noted that the initial data that had just been received required scrutiny and cross referencing before it was brought back to the Board, but that this would be added to the forward plan. The information would be used to inform the Housing Asset Management Strategy which was on the forward plan to be reported to the Board in April 2025.
- An updated timetable for the output from the stock condition survey to give a forward view of what was happening with the report and what the next dates would be to be presented at the January HRB meeting.
- Housing Revenue Account financial monitoring reports to be included on every HRB agenda.

It was noted that extraordinary meetings could be called if necessary.

23 Staffing update

The Interim Assistant Director for Housing (Regulated Services) gave a brief update on staffing changes in the Housing Service. He reported that Susie Williams, Responsive Repairs and Voids Service Manager, had left the organisation at the end of August and he wished her the best of luck in her new role. Recruitment for the role was currently underway. The Interim Assistant Director for Housing (Regulated Services) announced that his old role of Interim Tenancy Services Manager (Regulated Services) had successfully been backfilled by Darren Hicks. Liam Reading had been appointed as Assistant Director for Housing Programmes, Investment and Development. He also introduced Les Joint, Housing Maintenance Surveyor to the Board. The Interim Assistant Director for Housing (Regulated Services) advised that a formal housing staff structure would be produced with a brief description of the housing roles.

A request was made for an organisational structure chart detailing ‘who’s who’. In response to a question about staffing levels the Director for Housing and Health replied that she was confident that the right people were in the right posts and that the service was adequately staffed. A reduction in staffing costs had been seen due to a number of agency staff becoming permanent. The number of staff across the teams had remained similar, with the changes in staffing being at higher level. It was noted that the property and asset team was currently understaffed at management level.

24 Financial monitoring report

The Finance Manager’s report gave a summary of the Council’s Housing Revenue Account (HRA) and associated capital programme’s overall financial position for 2024/25 at the end of month six (30 September 2024).

Producing a Housing Revenue Account had been a statutory requirement for Councils who managed and owned their housing stock for some time, and therefore a key document for the Board to influence.

Current monitoring indicated that:

- The revised HRA budget approved by Council (July 2024) agreed the use of the HRA balance up to £1.750m in year, with the acceptance that this would take the HRA balance below its minimum adopted level of £2.1m to £1.350m, to be replenished in future years.
- Expenditure was being maintained within this perimeter but further analysis on future spending projections was ongoing to maintain full assurance on this position to year end.

The Finance Manager’s report summarised increased flexibilities for financial years 2024/25 and 2025/26 on Right to Buy Receipts, which were announced by the Ministry of Housing, Communities and Local Government on 30 July 2024. By deciding to fund all Right to Buy acquisitions with 100% capital receipts would enable the Council to utilise this limited window of opportunity and also provide the funding required to immediately address an area of significant risk to both the Council and tenants (electrical compliance) without impacting the previously agreed and budgeted borrowing needs.

It was noted that both garage income and lost rent due to voids were greater than expected and this would need to be addressed during the forthcoming budget setting process. The Board also noted the revenue expenditure by categories and the notable variations in expenditure in disrepair and complaints and within supervision and management. Officers explained that there was now greater oversight and scrutiny of the budget and careful monitoring ensured that there was more control on the level of spend due to better knowledge of what was coming forward. The stock condition survey would inform the budget setting process.

The Finance Manager's report also detailed the funding and predicted borrowing requirement. He explained that the potential forecasting available was £7.4m versus a forecast capital expenditure of £13.3m. This left a residual borrowing requirement of £8m rather than the £9.2m originally budgeted for.

RECOMMENDED:

1. that Cabinet acknowledge the variances identified as part of the Revenue and Capital monitoring process up to month six.
2. that Cabinet approve the recommendation contained within the report to fund all Right to Buy acquisitions with 100% Right to Buy capital receipts and the £0.975m of budgeted borrowing released by this be utilised to fund the urgently required electrical compliance work.

25 Performance update

The Housing Review Board were presented with the key performance indicator (KPI) dashboard and the compliance dashboard for quarters one and two 2024/25. The performance report encapsulated complaints data as well as tenant satisfaction measures. The Interim Assistant Director (Regulatory Services) gave a presentation which summarised the performance and actions being taken to improve performance where targets were not being achieved. Targets were set annually and figures were benchmarked against the previous financial years' performance and HouseMark was used to benchmark performance and set targets for the KPIs against performance of other social housing landlords.

Discussion and clarification included the following points:

- Income collection – rent arrears as a percentage of the annual rent that the Council should be receiving. Performance in this area was strong, with the Council above its own target and within the top quartile of landlords nationally.
- Income lost through void properties – although void loss was significantly higher than the top quartile of landlords nationally the housing service was improving its performance, with void loss figures continuing in the right direction.
- Properties vacant and not available to let – the management of the turnover of vacant stock to ensure a reduced number of vacant properties were held at any one time. Performance was below target but continuing to improve in this area.
- Average days to relet homes – there had been an improvement of 55.71 days in this area since the end of 2023/24. Over the last 12 months officers had worked through a backlog of vacant properties whilst balancing this with the void budgets and projected rent loss. There continued to be a positive downward trend.
- Routine repairs completed in target and emergency repairs completed in target – work was being undertaken with the contractors to reconcile outstanding jobs and completion dates, and ensure robust and accurate reporting. Data validation was needed as the systems were recording different target completions. Performance so far was around 5% higher than the previous year. 8,736 routine and emergency repair jobs had been completed across both contractors so far this year.
- Compliance – this area had presented the biggest challenge so far this year, particularly in relation to electrical checks. There had been a huge improvement in performance following a change of contractor.

The Housing Performance Lead reported that good progress had been made on reducing complaints, mainly due to staffing changes and implementing dedicated resources. Communication was a key driver in the complaints system and measures were in place to improve this. There had been an excellent improvement in the response times for stage one complaints from quarter one to quarter two. However, there was a significant backlog of stage two complaint investigations and responses during quarter two. This was largely due to the departure of the Property and Assets Service Manager at the end of August. A task force of senior managers had now been put in place to clear outstanding complaint responses over the next couple of weeks. Officers recognised the need to continuously improve in complaints handling and meet the requirements of the Housing Ombudsman Complaint Handling Code.

Tenant satisfaction had been moved from annual to quarterly surveying in order to review and analyse tenants' satisfaction levels on a more regular basis and be more responsive to any trends. Although it was acknowledged that there was still much room for improvement in the tenant satisfaction measures, improvement had already been achieved sine the survey at the end of 2023/24. It was noted that more negative feedback tended to be received during the winter months.

Officers were thanked for the comprehensive report which demonstrated the positive efforts being made to improve performance across all areas. Restaffing of the housing service with the right people in the right posts would continue to support the service to make good progress.

A request was made for a breakdown of void properties into ward areas to be made available for councillors.

RESOLVED: that the Housing Review Board note performance at the end of quarter two, 2024/25.

26 Housing Revenue Account position statement

The Housing Strategy, Enabling and Project Manager's report provided the Board with an update on the key plans, strategies and work streams relating to the Housing Revenue Account (HRA). It covered the current financial position, the stock condition survey, the Chartered Institute of Public Finance and Accountability (CIPFA) healthcheck, the HRA sustainability plan, the business plan and options appraisal work, the asset management strategy and the housing investment and delivery plan. These elements collectively formed the strategic plan and framework to establish the financial and operational sustainability of the HRA and this was explained within the report.

The Housing Strategy, Enabling and Project Manager highlighted that the issues facing EDDC's HRA were reflective of national issues and pressures, which included:

- Funding.
- Rent restrictions.
- Ageing housing stock.
- Rising costs.
- Borrowing limits.
- Employment market.

There was an increasing call from local authorities and other interested organisations to review the financial relationship between stock holding authorities and central government. Despite this EDDC was planning and undertaking significant work to respond to the challenges outlined in the report, with the overall objective of ensuring that EDDC provided the best possible services to its existing tenants and future residents.

The Housing Strategy, Enabling and Project Manager's report provided an update on a series of interlinked plans, workstreams and strategies which aimed to answer 'can the current business model and financial position of the HRA effectively respond to the challenges arising from the stock condition survey and deliver safe, warm, affordable and regulatory compliant homes for our tenants; and does the HRA have capacity to go further and improve our communities and meet the increasing demand for additional affordable homes for residents in East Devon?'. Included as an appendix to the report was a HRA roadmap outlining a projected timeline.

The Board acknowledged that the Council needed to provide good, safe, decent homes, but this needed to be balanced against income.

RECOMMENDED: that Cabinet note the Housing Revenue Account update report.

27 **Acquisitions and disposals policy**

The Housing Strategy, Enabling and Project Manager's report sought approval for the adoption of a Strategic Acquisitions and Disposals Policy for the Council's Housing Revenue Account (HRA) property portfolio. The introduction of the policy would enable the efficient and effective management of the Council's housing stock and other assets. The policy would form part of a comprehensive asset management strategy for the HRA and was being introduced at this stage to provide a framework for any acquisitions or disposals that might be required in advance of the adoption of a comprehensive asset management strategy, to assist in the effective management of the Council's housing stock in the interim period. The strategic acquisitions and disposals policy aimed to align with the broader housing strategy and Council's priorities of addressing the housing needs of residents whilst ensuring sustainable financial management of the HRA. The report outlined the rationale, key objectives and principles behind the acquisitions and disposals policy framework.

The proposed strategic acquisitions and disposals policy offered a proactive approach to managing EDDC's housing stock. By setting clear criteria and objectives for acquisitions and disposals, the Council could ensure it continued to meet the needs of its residents, optimise the use of resources and contribute to wider strategic goals such as reducing homelessness and providing warm, safe and well maintained homes for its tenants.

Concern was expressed over the disposal of properties and officers responded by explaining that disposal of stock might be necessary where properties no longer met strategic or operational objectives. Disposals would be progressed in order to support the efficient and effective financial management of the HRA and to ensure that the Council provided affordable, safe, warm and well maintained homes for its existing tenants. Disposals would be subject to a thorough evaluation process, including independent valuations, stakeholder consultation and assessment of alternative options. Where possible the Council would aim to retain properties for affordable housing.

RECOMMENDED: that Cabinet approve:

1. that the Strategic Acquisitions & Disposals Policy be adopted subject to 2(i) of the policy objectives being amended to 'Enhance Housing Stock; acquire properties

meet the needs of our community, including **good quality**, affordable and accessible housing needs'.

2. that delegated authority be granted to the Director of Housing, in agreement with the S.151 Officer and the Director of Governance & Licensing (the Monitoring Officer), to authorise the disposal of individual non contiguous HRA assets up to a maximum value of **£500,000,** in accordance with the adopted 'Acquisitions and Disposals Policy' and in consultation with the Portfolio Holder for Sustainable Homes and Communities.
3. that all acquisitions and disposals within the HRA be reported to the Housing Review Board and Cabinet.

28 Review and replacement of Home Safeguard equipment

The Director for Health and Housing updated the Board on the review and replacement of Home Safeguard equipment within housing stock. This was included on the forward plan for April 2025. It was noted that work was progressing towards purchasing a platform and that the Interim Assistant Director for Housing (Regulated Services) would be presenting a report explaining this, along with a timeline.

Attendance List

Board members present:
Councillor Aurora Bailey
Councillor Christopher Burhop
Councillor Sarah Chamberlain (Chair)
Councillor Melanie Martin
Councillor Simon Smith (Vice-Chair)
Sara Clarke, Independent Community Representative
Rob Robinson, Tenant
Councillor Jenny Brown

Councillors also present (for some or all the meeting)
B Bailey
I Barlow
C Brown
R Collins
S Gazzard
M Goodman
D Ledger
J Loudoun

Officers in attendance:
Sarah James, Democratic Services Officer
Alethea Thompson, Democratic Services Officer
Tracy Hendren, Chief Executive
Andrew King, Interim Assistant Director for Housing (Regulated Services)
Andrew Mitchell, Housing Solutions Service Manager
Giles Salter, Solicitor
Catrin Stark, Director of Housing and Health
John Symes, Finance Manager
Darren Hicks, Interim Tenancy Services Manager (Regulated Services)

Les Joint, Housing Maintenance Surveyor
Liam Reading, Assistant Director - Housing Programmes, Investment and Development

Rosie Dale, Tenant
Rachel Browne, Tenant

Chair .... Date: ....

Housing Review Board Forward Plan

Work for scoping and/or allocation to the Forward Plan

Proposed date	Topic
Meeting 1 24/25 1st August 2024	Housing Performance Report for Quarter 4 23/24 Housing Allocations Policy Update Financial Overview Housing Ombudsman; Statutory Complaint Handling Code Results of Tenant Satisfaction Measures (TSMs) Recruitment of Tenant Members of Housing Review Board Annual Tenant Event (Update, no paper required) Group Terms of Reference (Discussion, no paper required)
Meeting 2 24/25 7th November 2024	Housing Performance Report for Quarters 1 & 2 (24/25) Housing Acquisition and Disposal Strategy HRA Position Statement Financial Monitoring Report (month 6)
Meeting 3 24/25 30th January 2025	Housing Performance Report for Quarter 3 (24/25) ***(standing item)*** Staffing and Recruitment Update ***(standing item)*** Finance Report ***(standing item)*** Review of Individual Garden Maintenance Scheme and proposed service Electrical Compliance Audit: Outcome and Resulting Action Plan **Workshop:** Sheltered Housing Review Home Safeguard Technology and Digitalisation
Meeting 4 24/25 24th April 2025	Housing Performance Report for Quarter 4 (24/25) ***(standing item)*** Staffing and Recruitment Update ***(standing item)*** Housing Asset Management Strategy Review and replacement of Home Safeguard equipment within housing stock Review of progress on the objectives of the Resident Involvement Strategy Initial draft of Tenancy Strategy Home Safeguard Update: Digitalisation & Technology Review and implementation of digital capabilities for tenants including provision of a tenant portal
Dates to be confirmed	
TBC	Review of the Contract with StreetScene Services for Estate Management (communal cleaning and grounds maintenance)
TBC 4	Five-year investment and delivery plan (housing delivery 2024- 2029)
TBC 4	Future provision of responsive repairs delivery
TBC 4	Investment plan for planned maintenance

TBC 4	Investment plan for Housing Revenue Account play-sites
TBC 4	Management of leasehold properties and service charges
Workshops / Briefings Requested for HRB Members	
Before Q4 Meeting	Home Safeguard Digitalisation and Technology – workshop for board members to explain the detail behind the changes, what this means for us, and why we are having to make the decisions and proposals to both HRB and Cabinet.
Note that following the recommendations from the Centre of Governance and Scrutiny Report- the forward plan for this Committee will be aligned to the forward plans for other Scrutiny Committees and this will then link directly into the Cabinet Forward Plan. All above topics with then be aligned to the most appropriate meeting. This revised plan will come forward early in 2024/25. Review/creation of Policy and Strategy documents as required will also appear on the Forward Plan.	

Report to: Housing Review Board

Date of Meeting 30th January 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Draft Revenue and Capital Budgets 2025/26 & Monitoring to End Dec 2024

Report summary:

This report presents the draft revenue and capital budgets for 2025/26 relating to the Housing Revenue Account and the financial monitoring and outturn forecasting versus budget of the current financial year to the end of December 2024.

Recommendations from this meeting will be presented back to Cabinet on 5th February 2025 to finalise the 2025/26 budget proposals to recommend to Council.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That the draft revenue and capital estimates are approved and recommended back to Cabinet to finalise and the Financial Monitoring element presented is noted.

Reason for recommendation:

There is a requirement to set a balanced budget for 2025/26

Officer: Simon Davey – Director of Finance S151 sdavey@eastdevon.gov.uk
John Symes – Finance Manager DS151jsymes@eastdevon.gov.uk

Portfolio(s) (check which apply):
☐ Climate Action and Emergency Response
☐ Coast, Country and Environment
☐ Council and Corporate Co-ordination
☐ Communications and Democracy
☐ Economy
☒ Finance and Assets
☐ Strategic Planning
☒ Sustainable Homes and Communities
☐ Culture, Leisure, Sport and Tourism

Equalities impact Low Impact

An analysis of budget changes has not highlighted areas that give rise to any equality issues that need highlighting. There are no changes proposed from the current service provisions because of the draft budget that will affect individuals. Assessment attached.

Climate change Medium Impact

The budget approval gives the Council the resources necessary to undertake its business which will contribute to the carbon footprint of the Council. The Council is committed to reducing its carbon net emissions to zero by 2040 and resources have been factored into the budget to meet this priority including key actions identified in the Directorate Service Plans.

Risk: Medium Risk; Risks have been considered in preparing the budgets and the financial implications have been assessed at the point of preparation. Various budget assumptions have been made including the treatment of inflation and interest rates; estimates on the level and timing of capital receipts; the treatment of demand led pressures; the treatment of planned efficiency savings/productivity gains; levels of income; financial risks inherent in any new arrangements; capital developments; the availability of funds to deal with major contingencies and the need for any provisions. In each of these areas the Council's financial standing, management and track record have been considered to prepare robust budget proposals. Other specific areas of risk have been highlighted where appropriate within the report.

Links to background information 2025/26 Budget Book; Fees & Charges Schedule with proposed charges for 2025/26

Link to Council Plan

Priorities (check which apply)

☒ A supported and engaged community
☒ Carbon neutrality and ecological recovery
☒ Resilient economy that supports local business
☒ Financially secure and improving quality of services

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1 Housing Revenue Account Budget 2025/26

1.1 Housing Revenue Account (HRA) Overview & Introduction

Below is an overview of the Housing Revenue Account (HRA) with prescribed categories of expenditure and income giving the proposed budgetary implications for 20256/26. There is also a Q&A section in Appendix 2 included to assist.

The HRA records expenditure and income on running the council's own housing stock and related services or facilities, which are provided primarily for the benefit of the council's own tenants. The HRA is a ringfenced account within the General Fund with strict legal and accounting rules to maintain separation from the General Fund. The HRA Account must always remain in surplus, and this must be considered when setting each year's budget and when planning for the future.

The HRA consists of capital and revenue elements. Capital is typically asset enhancing items such as kitchens, bathrooms, windows etc or a project of more minor works to multiple properties. Revenue is typically low-level repairs and maintenance with regards to spend on assets plus staff and service costs, overheads etc. The Council is allowed to borrow to fund capital expenditure, but not revenue without specifically required central government permission.

1.2 2024/25 HRA Budget Evolution

The initial budget presented to members in this same paper a year ago was in effect a “roll over” budget from the previous year, with few changes other than known inflationary uplifts from that presented for 2023/24.

As members will be aware, the 2023/24 HRA outturn and capital spend far exceeded the expectations that were included within that year’s budget, requiring the contribution of all HRA earmarked revenue reserves and adding an additional £2.5m to the HRA’s borrowing requirement in order to maintain the £3.1m adopted level of the HRA balance.

Therefore, shortly after the start of the current financial year, it was established that the proposed 2024/25 budget would be insufficient to meet the needs and demands of the housing service and provide the investment required to ensure regulatory compliant homes. A revised budget was approved by Council in July 2024.

During the 2024/25 financial year there have been numerous significant budget movements within the HRA (virements) which in effect have transferred significant sums from revenue to capital. This has been the result of the underlying works included within the revised budget being scrutinised in detail within the regular collaborative financial management framework which has been established. This has been presented and where necessary approval given through HRA financial monitoring reports to Committees. The 2024/25 budget figures presented for comparison are those which are currently being reported, and monitored against in 2024/25.

1.3 **Revenue Budget**

The following outlines the key budget areas, headline figures and comparatives for the HRA in 2025/26 v 2024/25. The general spending categories below are set by the Chartered Institute for Public Financial Accountancy (CIPFA) with a brief summary of what is included in each.

1.4 **Income**

The primary sources of income for the HRA are rents on dwellings, garage income and other income including service charges. Rent on dwellings has been increased by the central government recommendation of September CPI +1% (1.7%+1% = 2.7%) with the remaining income streams also appropriately inflated. The forecast income is expected to be:

- £21.66m for dwellings, an increase of £0.57m year on year
- £0.26m for garages, an increase of £0.1m year on year
- £0.74m for other income, an increase of £0.05m

1.5 **Repairs and Maintenance (R&M)**

This includes all major expenditure which falls into the revenue category and is segregated into general or responsive R&M and planned R&M, the vast majority of which is covered by our Integrated Asset Management contract (IAMC) with Ian Williams Ltd.

- General or responsive R&M generally results from issues that have been raised by tenants for resolution and can vary from incredibly simple jobs such as fixing a tap to much more complicated involved issues to address. These more complex issues, upon surveying, may well become asset enhancing and therefore would be moved to the Capitalised responsive repairs and maintenance budget.
- Planned R&M includes the more routine or cyclical in nature works such as decoration, planned minor works and compliance related testing and servicing.
- The budgeted spend on Repairs and Maintenance as a whole is approximately £7.13m an increase of £0.05m v 2024/25, which can be attributed to the inflationary increase on the Price Per Property payment under the IAMC.

1.6 Supervision & Management (S&M)

The S&M section of the HRA covers a wide variety of costs related to the management and administration of council-owned housing. Key types of expenditure include;

- All HRA direct staffing costs including training, development etc with regards to the day to day activities, management and administration of the service.
- Property Management costs – supervision of repairs, managing of empty properties and development of strategic property decisions.
- External Services & Overheads – including consultants' costs and recharges from the general fund for shared services such as IT, Legal Services, Accountancy etc
- The budget for Supervision & Management as a whole in 2025/26 is £9.1m a decrease of £0.29m v 2024/25, the most notable of which being;
  - **£0.12m decrease in Employment costs**

    The 2024/25 budget stated that the structure of the service was under review and included a significant contingency balance to address this. As stated in the recent Housing Review board meetings, housing senior management are now confident that we have roles in the right places, therefore the 2025/26 staffing budget has been based upon this structure. A 2% inflationary uplift has been applied to all roles and an additional 1% contingency, with the 15% change in National Insurance included but assumed to be refunded by central government as per the General Fund.
  - **£0.20m decrease in Overheads/Recharges**

    Recharges have been reviewed within the year through the collaborative financial management framework and despite increases due to Strata inflationary uplifts for external IT costs for example, savings have still been made year on year.

1.7 Other expenditure/Special Services

This section mainly includes the budgets for tenant engagement related activities such as the Tenant Participation and Community Development teams as well as special services that the Council must provide with regards to tenants. The most notable of this latter category is the decanting of tenants to temporary accommodation when major works are being undertaken and their Council dwelling is uninhabitable. The forecast expenditure is expected to be £1.15m an increase of £0.06m on the prior year.

1.8 Capital Charges

The two entries within this section of HRA expenditure are;

- Changes to the bad debt provision – this is difficult to predict and in the past when reviewing the actual movements has not been material therefore no entry has been made.
- Depreciation/Major Repairs Reserve/Revenue Contribution to Capital – the HRA guidelines require the council to make in effect what is a revenue contribution to capital which is equivalent to the amount of depreciation calculated on the council dwellings in that financial year. A £2m contribution has been included for 2025/26 a very marginal change to the budget of 2024/25 (the value of depreciation within the 2023/24 financial accounts was £1.8m).

1.9 HRA Financing

The HRA financing section can be split into 3 specific areas which are addressed below;

- **Debt Financing**

- As at 31st March 2024, the principal amount of debt the HRA owed was £84.6m, with £78.5m owed to the Public Works Loan Board and the remaining £6.1m owed to the General Fund.
- The 2025/26 financing charges have been increased by £0.47m. This reflects both the cost of additional borrowing based upon the 2024/25 Capital Financing requirement of £9.1m @ 4.5% plus a marginal outturn variation adjustment v the 2024/25 budget. This is addressed further in the Q&A section as there has been change in the assumptions made and stated in the final 2024/25 July budget report.

- **Interest Income**
  - The 2024/25 budget did not contain an amount for interest income and the current treasury forecast is that the HRA will receive £0.43m based upon the balance of useable HRA reserves held (the HRA balance plus the right to buy receipts reserve).
  - In 2025/26 an income amount has been included, however, due to the agreed reduction in the HRA balance in 2024/25 and capital expenditure in year on affordable homes, under the right to buy replacement program, this has been reduced to a conservative estimate of £0.24m.
- **Movement in Reserves**
  - The current 2024/25 budget contains a revenue contribution to capital of £0.9m which finances the capital program and achieves the in year capital financing requirement as stated in the 2024/25 budget papers. The introduction of this has resulted from the in year virements previously mentioned. This will not be continued in 2025/26 as all revenue and capital spend has been correctly allocated.
  - As stated in the 2024/25 budget, the agreed annual contribution to the HRA balance to be made each year of £0.25m, to reinstate the HRA balance to the adopted level of £3.1m, has been included in the 2025/26 budget.

1.10 Table of Movements

The following table shows the movements described above and the overall impact they have upon the 2025/26 budget in comparison with 2024/25.

INCOME	BUDGET		
	24/25	**25/26**	**Diff**
Dwelling Income	-21,088,320	-21,659,900	-571,580
Garage Income	-155,292	-262,800	-107,508
Other Income	-692,628	-738,826	-46,198
	-21,936,240	-22,661,526	-725,286

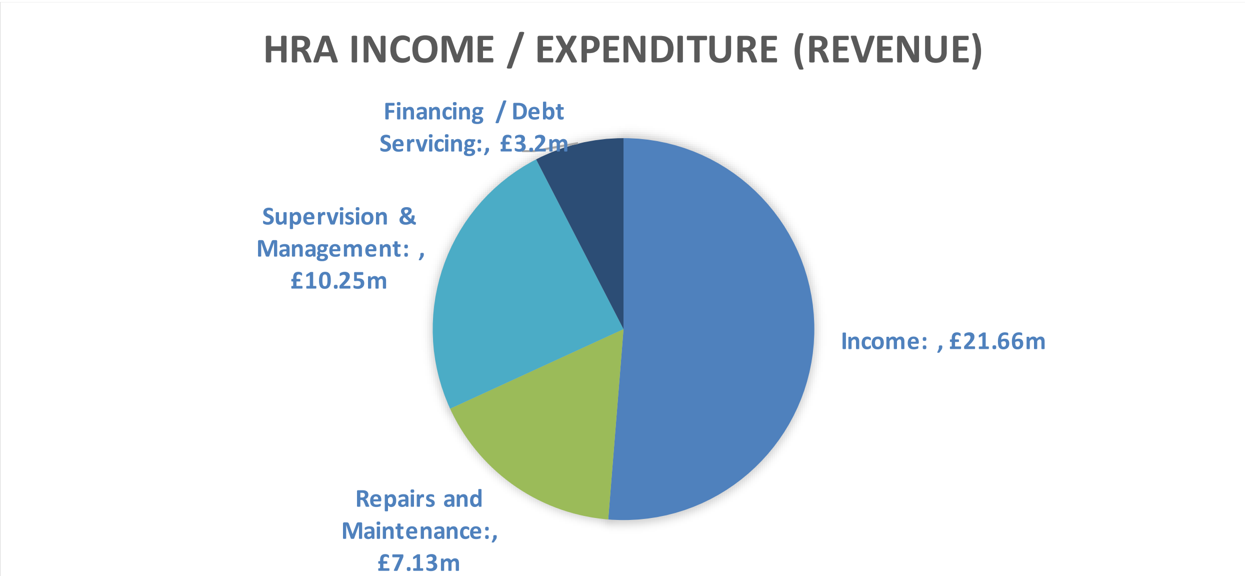
EXPENDITURE	BUDGET		
	24/25	**25/26**	**Diff**
REPAIRS & MAINTENANCE	7,083,504	7,133,867	50,363
SUPERVISION & MANAGEMENT	9,388,046	9,101,700	-286,346
OTHER EXPENDITURE	1,091,844	1,154,351	62,507
CAPITAL CHARGES	2,028,300	2,000,000	-28,300
	19,591,694	19,389,918	-201,776

FINANCING	BUDGET		
	24/25	**25/26**	**Diff**
Debt Financing	2,787,276	3,256,608	469,332
Interest Income	0	-235,000	-235,000
Reserve/Capital Contribution	893,270	250,000	-643,270
	3,680,546	3,271,608	-408,938

HRA Account	BUDGET		
	24/25	**25/26**	**Diff**
Surplus/Deficit	1,336,000	0	-1,336,000

1.11 Graphical Split of HRA Budget Areas

The following table graphically highlights the four main categories that drive the makeup of the HRA budget for 25/26.

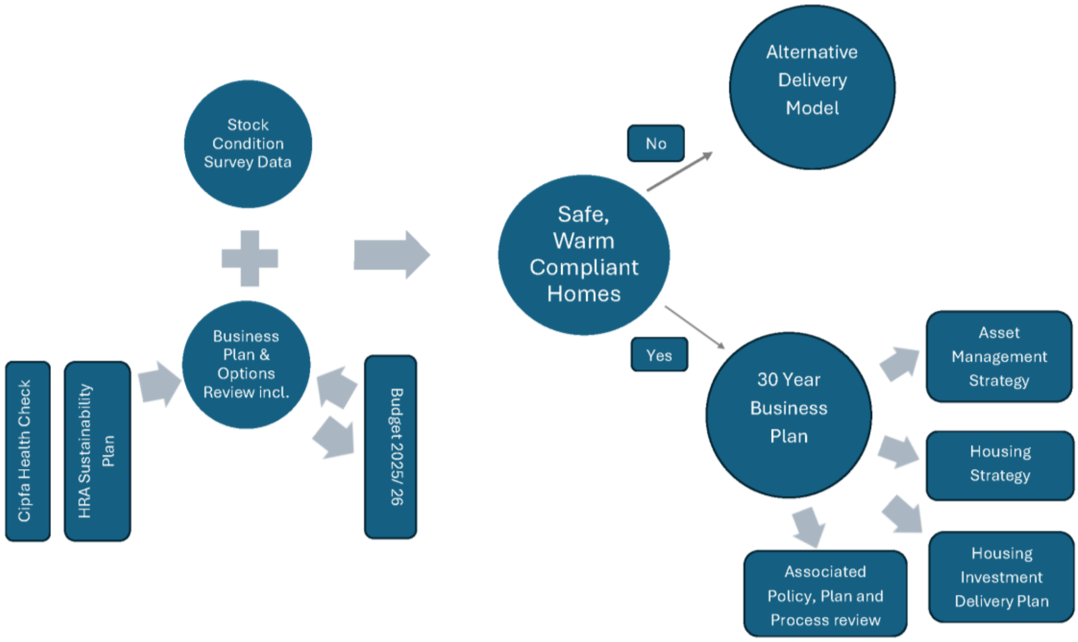


1.12 HRA Future Financial Pressures

The Housing Revenue Account has and continues to face, significant financial pressure in the immediate and longer term. These pressures arise from a range of factors including an historic underinvestment, increased consumer and regulatory standards, general inflation, restrictions in rent increases, net zero expectations, disrepair claims, complaint resolution, high void and decant costs and other issues. Similar cost pressures are being seen in other stock holding local authorities.

1.13 **Longer Term Financial Plan**

In recognition of the above, the Council has developed a strategic plan to address these immediate pressures and ensure a long-term sustainable business model is in place to ensure we can provide safe, warm and regulatory compliant homes. This plan includes a series of interlinked plans, workstreams and strategies as set out in the diagram below.



A Financial Sustainability Plan is in place to address and respond to the short-term financial pressures facing the HRA. This plan sets out a range of measures to increase income and deliver savings over the next 1 – 2 years and includes recommendations from the Chartered Institute of Public Finance & Accountancy (CIPFA), who have undertaken a Health Check of the HRA.

Savills, a market leading expert in Asset Management consultancy, are also assisting the Council with a Business Plan and Options review. This will enable the Council to produce a robust Asset Management Strategy whilst considering alternative delivery models if appropriate and create a 30-year Business Plan to ensure the HRA remains a going concern.

The objective of a business plan is to ensure sufficient annual budget is available to improve and maintain our homes whilst continuing to provide good quality services to our tenants. It's aim is to model income streams whilst also setting out and phasing the key objectives for maintaining the housing stock on an ongoing basis. Including within these objectives will be priorities such as decarbonisation, stock management (including plans to acquire or build new affordable homes) and required essential upgrades and enhancements throughout the plans lifecycle.

The results of the stock condition survey will interlink with the longer-term financial planning outlined above, ensuring investment is targeted and efficient.

1.14 **2025/26 Proposed Capital Budget Considerations**

Unfortunately, as has been discussed in previous committees, the Stock Condition data is not available to drive the 2025/26 budget preparation. There are, however, clear known priorities for capital investment in our stock which has influenced the creation of the 2025/26 capital programme. These include.

- Addressing Category 1 & 2 Hazards
- Tackling Damp & Mould
- Continuing to ensure Regulatory Compliance
- Increasing the number of Decent Homes
- Reduced responsive repairs through planned investment programmes.
- Addressing major repair works
- Reducing void turnover times

1.15 **Proposed Capital Programme 2025/26**

The following Table outlines the proposed capital programme for 2025/26, categorised by their appropriate programme areas, compared with the current 2024/25 position.

amme Area	Project / Programme	24/25 Budget	25/26 Budget	Diff
Affordable Homes	RTB Acquisitions	3,320,000	750,000	-2,570,000
Housing Compliance	FRA Actions	800,000	500,000	-300,000
	Co2 & Detection	400,000	500,000	100,000
	Fire Doors	650,000	1,050,000	400,000
	RADON	0	150,000	150,000
	Sewerage Plants	500,000	500,000	0
General Housing Programmes	Disrepair And Complaints	1,810,000	1,500,000	-310,000
	Social Serv Adaptations	746,000	700,000	-46,000
	LAD Programme Completion	150,000	2,099,520	1,949,520
	Capital Major Works	710,000	3,242,900	2,532,900
Major Repairs	Windows	150,000	416,000	266,000
	Roofing Renewal	132,000	264,000	132,000
	Replacement Bathrooms	240,000	400,000	160,000
	Replacement Kitchens	550,000	1,300,000	750,000
	Pvcu Fascia Replacement	0	150,000	150,000
	Heating Upgrades	0	150,000	150,000
	Gas Boilers Replacement	500,000	750,000	250,000
	Electrical Updating	975,000	700,000	-275,000
	Capitalised Responsive Repairs	1,000,000	1,000,000	0
	Ppv Voids	2,500,000	2,250,000	-250,000
TOTAL		**15,133,000**	**18,372,420**	**3,239,420**

1.16 **HRA Capital Programme Overview**

Affordable Homes Programme (AHP) (£0.75m)

The AHP is expenditure allocated to the acquisition and development of new affordable housing. It is now funded entirely from Right to Buy receipts per the recent central Government guidance. The Council are currently developing a Housing Investment and Delivery plan which will set out our intentions for investment in future years. Whilst we have paused our acquisitions programme until this is completed, an amount of £0.75m has been included to account for operational or strategic acquisitions that may arise in 2025/26.

Housing Compliance (£2.7m)

The Council has a duty to ensure our homes meet the required legal and regulatory compliance standards. Our compliance work includes capital expenditure to remediate fire risks, undertake programmes of co2 and smoke detection installations and other similar capital expenditure. Areas such as servicing and testing of existing compliance equipment are non-capital works and accounted for within the Revenue budget.

HRA Capital Programme – General (£7.5m)

The Capital Programme – General, includes the following items

- Disrepair And Complaints
  Capital expenditure on disrepair and complaints is forecast to amount to £2.15m during 2024/25 and includes essential repairs work. Expenditure in this area is forecast to reduce in 2025/26 as planned programmes address issues with stock condition resulting in a reduction in disrepair and complaints.

- Social Services Adaptations
  This includes major adaptations including remodelling, accessible bathrooms, stairlifts etc to provide suitably adapted accommodation for our residents.

- LAD - Programme Completion
  The LAD is a programme of improvement works focused on energy efficiency to an identified number of properties for which the Council received partial government funding. The budget provides the necessary capital to complete the programme and meet our obligations under the grant funding award.

- Capital Major Works
  This programme includes specific Major Projects allocated to a specific property, group of properties or block of flats. These items range widely in nature and cover a multitude of issues from whole block refurbishments to items identified in specific properties which if left unresolved may result in health and safety issues for tenants.

Major Repairs £7.4m

The major repairs capital budget includes expenditure for our major repairs programme such as windows, doors, kitchens etc alongside repairs to void properties and some responsive repair costs.

1.17 **Additional Borrowing Implications**

The impact of the above capital programme will add an additional £15.15m borrowing requirement to the HRA after applying the following funding streams to the £18.37 Capital Expenditure figure;

- £0.75m RTB receipts for Affordable Housing
- £0.47m unringfenced RTB receipts
- £2m depreciation related/Major Repairs Contribution

1.18 **Potential In Year Variations/Virements**

The recent stock condition survey provides the necessary data to develop a robust Business Plan and Asset Management Strategy. This will enable future investment to be targeted efficiently and effectively to address the issues and maintenance requirements identified through the Stock Condition Survey. This process is ongoing and may result in a change in a change in capital investment priorities during the year. For example, this may include an increase in capital expenditure in one area and a reduction in another. Any changes will however be within the overall cost envelope of the approved capital programme budget.

1.19 **Risks & Future Implications of the Capital Programme**

It should be noted that the proposed capital programme amounts to a significant investment in the Councils housing stock. This investment will result in a substantial level of additional borrowing and an increase in the overall HRA Debt burden. The servicing of this debt will be met from within the HRA Revenue Budget and therefore create further pressure on revenue in future years. This additional interest expense burden will need to be offset by efficiencies, savings and income generation through strategic asset disposals. The longer-term revenue implications of capital investment will be modelled as part of the Business Plan review to ensure the HRA remains a going concern.

2 Housing Revenue Account & Capital Monitoring to Dec 2024

2.1 Opening Positions

Revenue Account

HRA Revenue Position	£m	F/A*
HRA balance @ start 24/25	**(3.100)**	**F**
Approved deficit for the 24/25 financial year	1.337	A
HRA balance @ end 24/25	**(1.763)**	**F**

Capital Programmes

HRA Capital Position	£m
HRA predicted capital expenditure 24/25	**15.1***

*includes the £0.975m electrical works and £0.89m transfer from revenue agreed in prior report

2.2 Housing Revenue Account

2.21 Income

Income and lost rent due to voids continues to be materially in line with expectations for dwellings and better than expected income for garages.

Year to Date				4Cast Outturn		
Actuals	Budget	Diff	INCOME	Actuals	Budget	Diff
-15,892,986	-15,816,240	-76,746	Gross Property Rents	-21,184,325	-21,088,320	-96,005
-151,985	-116,469	-35,516	Garage Rents	-202,768	-155,292	-47,476
-505,944	-519,471	13,527	Other Income	-672,046	-692,628	20,582
-16,550,914	-16,452,180	-98,734		-22,059,140	-21,936,240	-122,900

2.22 Revenue Expenditure

The below table shows variations in expenditure against the above budget within each HRA reporting line.

Year to Date				4Cast Outturn		
Actuals	Budget	Diff	EXPENDITURE	Actuals	Budget	Diff
3,882,415	4,207,941	-325,526	1 Repairs And Maintenance - General	5,549,900	5,610,504	-60,604
495,474	1,104,750	-609,276	2 Repairs And Maintenance - Special	1,317,039	1,473,000	-155,961
7,800,745	7,804,116	-3,372	3 Supervision And Management	9,039,474	9,388,046	-348,573
861,502	852,696	8,806	4 Other Expenditure	1,083,038	1,091,844	-8,806
1,521,225	1,521,225	0	5 Capital Charges & Bad Debt Total	2,028,300	2,028,300	0
14,561,361	15,490,728	-929,367		19,017,751	19,591,694	-573,943

Within Supervision & Management significant savings have been seen with regards to vacant permanent posts which has been partially offset by an increase in Agency costs and higher than anticipated insurance premiums.

2.23 Financing & Movement in Reserves

The below table shows the variations in Financing and the movement in reserves. There are two drivers to this variation.

- Net interest income is £0.4m higher than anticipated
- The contribution to capital is £1.1m higher than expected (which means additional funding for capital) due to the aforementioned favourable revenue variances leaving the HRA forecast as budgeted.

2.24 **Housing Capital Programmes**

The variations in each of the capital work streams can be seen within the below table.

Year to Date				4Cast Outturn		
Actuals	Budget	Diff	INCOME	Actuals	Budget	Diff
1,726,881	1,462,737	264,144	1 Affordable Housing	1,952,394	1,950,316	2,078
778,734	1,027,500	-248,766	1A Grant Subsidised Affordable Housing	779,390	1,370,000	-590,610
199,369	1,762,497	-1,563,128	2 HRA Capital Housing Compliance	1,522,831	2,349,996	-827,165
2,013,644	2,029,443	-15,799	3 HRA Capital Programme	3,096,732	2,705,924	390,808
5,070,335	5,067,860	2,476	4 Major Repairs Total	7,506,148	6,757,146	749,002
9,788,964	11,350,037	-1,561,073		14,857,495	15,133,382	-275,887

The one notable variation from the prior report is within compliance as the expected expenditure on CO2 monitoring is likely to slip into the following financial year.

2.25 **Funding & Predicted Borrowing Requirement**

The previously presented report had the forecast residual borrowing requirement significantly below the £9.2m prediction at £8m. The above movements do not contradict this and allows for headroom should any variable funding elements such as unringfenced right to buy receipts be at lower-than-expected levels.

Financial implications:

This report outlines in detail the financial implications and risks associated with the budgets proposed.

Legal implications:

No legal observations are required.

Appendix 1: Recharging of Costs

The recent restructure of the council, addition of new director and assistant director posts and their underlying reporting lines has meant that the recharges applied across the council required significant review and change. Upon doing this, the decision was made within Finance to redesign the recharge process in its entirety, as the existing historic spreadsheet model being used was no longer fit for purpose and didn't allow for efficient recalculation upon changes being made.

The recharge process now applied can be broken down into the following sections, with recharges applied down the structure or levels below and not back upwards, as this can cause an infinite loop of cost allocation. The recharge process begins once all other costs have been finalised and establishment has been confirmed.

A. **Level1: Strata IT costs and Corporate Buildings**
   This first section of recharges considers the above related cost centres and allocates then in their entirety across every cost centre on an FTE basis, from the Chief Exec level all the way down the structure of the council.

B. **Level2&3: ELT Level Recharges**
   Upon receiving the above costs into their cost centres, the total achieved for the Chief Exec initially is allocated down to the Director level, again based upon FTEs, then with the CEO recharge also included the Directors costs are then allocated similarly.

C. **Level4: Corporate Council Core Service Recharges**
   Those cost centres considered next are those which are core council services and which have previously been earmarked to be 100% reallocated, such as HR, Accountancy, Corporate Health & Safety & Medical fees as examples. The total on each cost centre for these areas, after the allocation of 1&2 above are then also reallocated across the council on an FTE basis.

D. **Level5: Intra Service Recharges**
   The total on each of the cost centres that have chosen to reallocate charges from Operational or Management cost centres, down to their underlying service lines are then considered after 1-3 have been applied. These are generally done on a specific percentage basis, examples of these being Licensing, Planning Admin and Street Scene Management.

E. **Level6: Specific Recharge Costs**
   The final level of recharges is where specific charges of specific amounts are made from one service/cost centre to the other. This generally occurs where it is either to complex to use overall percentages or a service is simply charging for a specific allocation of work/project costs that occurs within the year.

Appendix 2: HRA Q&A

Q: The statements made with regards to additional borrowing required within the 24/25 budget vary from those included within this report, why is that?

A: The 24/25 budget report included an amount referred to as a Voluntary Revenue Provision (VRP) that the HRA had made of £4.4m which would be used to reduce the borrowing requirement. The £4.4m referred to amounts that had been passed to the capital adjustment account (i.e. placed into a reserve between 2014-2017, although this reserve is unusable). The external advice we received from both an external HRA specialist consultant who was reviewing our accounts and then through CIPFA at the time was that we could spend against this £4.4m amount, contribute the expenditure element to the same reserve, netting to 0. Ultimately meaning for £4.4m of capital expenditure we would not require additional borrowing.

Unfortunately, these assumptions were incorrect as these amounts were not "available" VRP within the Capital Adjustment Account but contributions which paid down tranches of debt which became due in year (£0.6m in 2014, £1m in 2015, £1.5m in 2016 and £1.3m in 2017). The policy during these years was to pay down debt as it became due to reduce the interest burden on the HRA.

Q: The budget for Garage Income has increased significantly, whys is this considering the garage stock isn't in a good state of order?

A: The 24/25 budgeted amount for garage income is £0.155m. All income has been reviewed against the period 6/week 26 actuals for 24/25, forecast to the year end (multiplied by 2) and inflated. This provides a net figure of £0.263m (Income of £0.525m less an adjustment for void garages of £0.262m). The garage void ratio of 50% has been compared for the last 3 years in terms of actuals and it has remained consistent. As any redevelopment of garage sites awaits the decisions made within the options appraisal/asset management strategy the assumption made is that this will continue.

Q: What are the Council doing to address Damp and Mould

A: Damp and mould is a serious issue and can contribute to poor health. The Council are undertaking a range of measures to address the issue, including providing advice to tenants on how to avoid damp, making it easier for tenants to report damp and mould and also tackling the causes of damp through repair works. Our approach will prioritise any identified major damp issues before focusing on improving lower-level damp issues.

Q: What are the Council doing to address Category 1 and 2 Hazards

A: The Housing Health and Safety Rating System (HHSRS) is used to determine whether a house is "fit for human habitation" There are 2 categories of hazards. Cat 1 and 2. Category 1 are serious and require urgent remediation. Category 2 hazards are less serious but can cause health issues for occupants. The stock condition survey identified that 1.2% (44 homes) had Cat 1 hazards compared to a national average of 5.1%. All identified Cat 1 hazards are addressed as a matter of urgency once identified.

Q: What are the Council doing to deliver more decent homes.

A: The Decent Homes Standard (DHS) sets the minimum standards for social housing in England and ensures a property is in a reasonable state of repair. This includes key building components like the roof, chimneys, and internal amenities such as kitchens and heating systems. 11.96% of homes in East Devon fail the DHS which is broadly in line with the national average of

11.3%. The proposed budget includes a significant investment in key components that will improve our stock and increase the number of decent homes.

Q: Is there a limit on how much the Council can borrow to invest in the stock?

A: Borrowing for investment in our stock is governed by the CIPFA Prudential Code. Essentially this means that borrowing is limited to a level that can reasonably be afforded from future rental income. Our business plan work will establish our future borrowing capacity.

Q: Does the budget allocate funds to develop new housing, such as on our garage sites

A: There is no capital provision for development in the budget for 2025/26. There is however an ambition to build and buy new homes. This ambition will be set out in a 5 year Housing Investment and Development Plan which will follow on from the business planning process.

Q: What impact has the Stock Condition Survey (SCS) had on the budget.

A: The headline results from the stock condition survey have confirmed our understanding of the works needed to upgrade our stock. These are reflected in our stated investment priorities for housing in 2025/26. A more detailed analysis of the SCS will assist with the business planning and longer term strategic investment plans.

Q. Are we selling any stock to fund capital investment.

A: There are no specific plans to sell houses to generate capital receipts. The Council will however dispose of a limited number of poor performing assets where the cost of repairs significantly exceeds the future rental income. This is good practice and in line with the recently adopted Acquisitions & Disposals Policy. Any receipts will be available to fund the capital programme.

Q: Does the budget address decarbonisation.

A: The budget includes resources to deliver major improvements and fabric upgrades which contribute to thermal efficiency. There is also specific funding to complete the LAD project which includes thermal improvements, heating upgrades and solar PV installations. A longer term strategic plan for decarbonisation will be considered through the business plan process currently underway.

Report to: Housing Review Board

Date of Meeting 30 January 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Electrical Compliance SWAP Audit Report

Report summary:

In June 2023, after discovering it had become non-compliant with its 5-year electrical safety inspection programme, the council referred itself to the Regulator for Social Housing (RSH).

The council then produced an action plan to address the problems it had found and shared this with the RSH. The RSH ceased monitoring the council's progress in December 2023.

SWAP (internal Audit) undertook an audit of Housing Electrical Safety, their audit report reflects the conditions seen during fieldwork, which took place in early 2024. The report states that prior to and during the review, there has been significant officer turnover in Housing. The officers interviewed have now either left the council or changed role, and a new management team has been appointed. A specific Electrical Compliance Surveyor has been appointed and is working with the Assets Management Team to address concerns around the previous issues with electrical compliance records and data recording in addition to addressing issues with contractors who were not delivering against contract agreements.

Housing has agreed to complete nine actions by 1 April 2025. Officers have completed one action, and work has already started on four other actions.

This report has previously been presented and recorded at the Audit and Governance Committee on 27th November 2024, this Committee will receive a further update from SWAP on the progress on the implementation of the recommendations. It is considered appropriate that this Committee is made aware of this report and satisfies itself that appropriate progress against the recommendations are made.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

(1) Note the actions outlined in the audit report
(2) Asset Management Team to report to HRB at next meeting with full progress report on the action plan for assurance on completing all agreed actions

Officer**:** Simon Davey, Director of Finance

Portfolio(s) (check which apply)**:**
☐ Climate Action and Emergency Response
☐ Coast, Country and Environment
☐ Council and Corporate Co-ordination
☐ Communications and Democracy
☐ Economy

☐ Finance and Assets
☐ Strategic Planning
☒ Sustainable Homes and Communities
☐ Culture, Leisure, Sport and Tourism

Equalities impact Low Impact

NA

Climate change Low Impact

Risk: Low Risk; NA

Links to background information NA

Link to **Council Plan**

Priorities (check which apply)

☐ A supported and engaged community
☐ Carbon neutrality and ecological recovery
☐ Resilient economy that supports local business
☒ Financially secure and improving quality of services

Report in full

As above

Financial implications:

There are no direct financial implications

Legal implications:

There are clear legal implications in terms of the Council's non compliance in relation to Electrical Safety. The failings are being addressed and there is a plan underway to implement the actions identified. On that basis there are no substantive issues to be added to this update report at this time.

Housing Electrical Safety – Final Report – October 2024

Audit Objective

To assess the progress towards addressing the backlog of electrical safety inspections and repairs by the Housing Service.

Executive Summary

Assurance Opinion

Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.

Management Actions

Management Actions	
Priority 1	3
Priority 2	2
Priority 3	4
Total	9

Organisational Risk Assessment — **High**

Our audit work includes areas that we consider have a high organisational risk and potential significant impact.

Both senior management and the Audit Committee should consider key audit conclusions and resulting outcomes.

Key Conclusions

There is no one complete electrical safety compliance record. At the moment, Onehousing can record inspection outcomes but not recommended actions. Compliance officers use a spreadsheet to record the number of actions, but not what they are. Compliance officers told us that Onehousing does not have full compliance functionality. Housing is now looking at buying additional software to address this.

The Compliance team were not performing any quality assurance checks on the information recorded in Onehousing or the compliance spreadsheet. Spot checks have now been introduced.

The Electrical Safety Policy for Housing states the council's contractors must complete remedial works within 28 days of receiving an order.

At the time of our fieldwork officers told us they had no method of monitoring compliance with this requirement, and it was not a key performance indicator. However, officers have told us they have now implemented monitoring.

We found discrepancies between performance figures prepared by a Compliance officer and figures then used in service monitoring and KPI reports. These discrepancies appear to relate to differences in opinion about how the service should apply consultant downgrades and the possible risks of this approach. We could not confirm any reported figures because the service does not keep evidence to support KPI reports. Housing is now reviewing this in more detail and is working on introducing a new KPI dashboard.

Audit Scope

We reviewed the risk that an incomplete programme of electrical safety inspections and repairs work could lead to health and safety risks for tenants and financial and reputational damage to the council.

To do this we assessed the following control areas:

- The updated Electrical Safety Policy for Housing is compliant with electrical safety legislation and best practice guidance.
- The extent to which sufficient progress is being made to address the backlog of inspections and repairs.
- The performance data reported is accurate and complete and supported by evidence available within the Onehousing system.

We conducted audit interviews and testing between February and June 2024. This report reflects conditions that we saw at that time.

Further Information

In June 2023, after discovering it had become non-compliant with its 5-year electrical safety inspection programme, the council referred itself to the Regulator for Social Housing (RSH). The council then produced an action plan to address the problems it had found and shared this with the RSH. The RSH ceased monitoring the council's progress in December 2023.

This report reflects the conditions we saw during fieldwork, which took place in early 2024. Prior to and during this review, there has been significant officer turnover in Housing. The officers we interviewed during our fieldwork have now either left the council or changed role, and a new management team has been appointed.

Housing has agreed to complete nine actions by 1 April 2025. Officers told us they have completed one action, and work has already started on four other actions.

Full details of our audit testing are available upon request. Our audit assurance framework and definitions can be found here (www.swapaudit.co.uk/audit-framework-and-definitions).

Report to: Housing Review Board

Date of Meeting 30 January 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Housing Performance Report – Q3 2024/25

Report Summary

The following report outlines the Housing Service's performance through quarter 3 of FY 2024/25.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

The Housing Review Board receives the report and our performance at end of quarter 3, 2024/25.

Reason for recommendation:

To ensure the Housing Review Board have assurance around service delivery, performance and compliance with our health & safety responsibilities. To enable the Board to scrutinise and challenge the performance of the housing service.

Officer**:** Andy King, Interim Assistant Director for Housing (Regulated Services)

Portfolio(s) (check which apply)**:**
☐ Climate Action and Emergency Response
☐ Coast, Country and Environment
☐ Council and Corporate Co-ordination
☐ Communications and Democracy
☐ Economy
☐ Finance and Assets
☐ Strategic Planning
☒ Sustainable Homes and Communities
☐ Culture, Leisure, Sport and Tourism

Equalities impact Low Impact

Climate change Low Impact

Link to Council Plan

Priorities (check which apply)

☒ Better homes and communities for all
☐ A greener East Devon
☐ A resilient economy

Financial implications:

No financial implications on which to comment.

Legal implications:

There are no legal implications requiring comment.

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1. Understanding This Report

1.1. The data presented in this report is colour coded in a traffic light system. Green means we are meeting or exceeding our targets, amber that we are close to target, and red means we are outside of target.

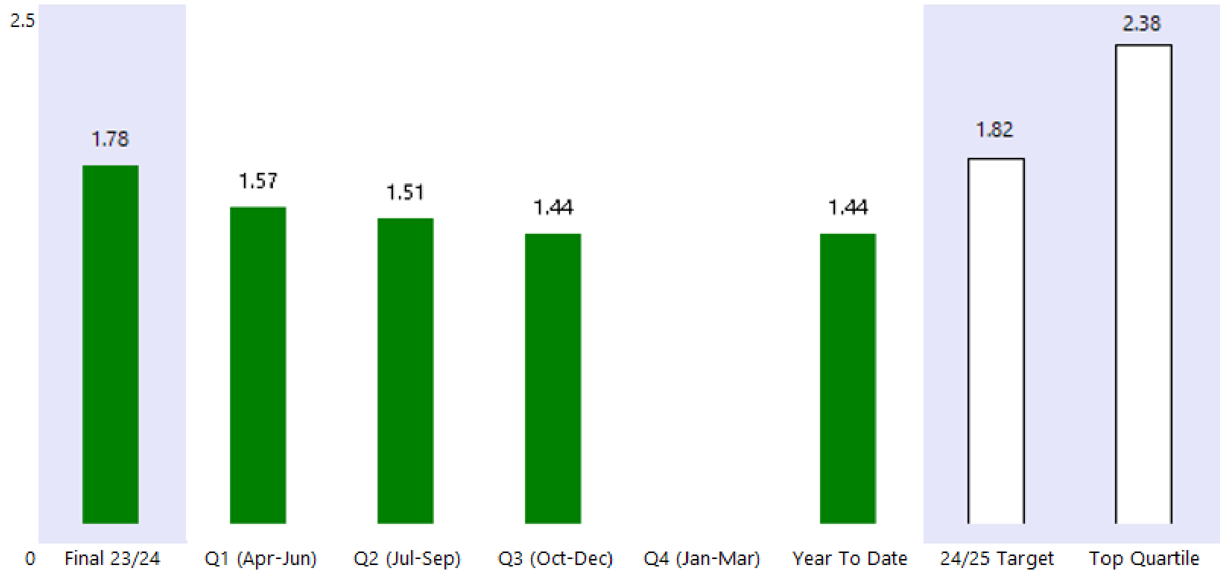
1.2. Targets are set annually and are our benchmark for where we would like our performance to be.

1.3. Top Quartiles are the benchmark figures from Housemark, which tells us whether or not we are in the top 25% of best performing landlords.

1.4. The ‘Final 23/24’ data shows us where our performance was at the end of the last financial year, which gives us an indication of how we are doing compared to last year’s performance.

2. Income Collection

2.1. Infographic; Rent arrears of current tenants as a % of annual rent debit:



	Final 23/24	Q1 (Apr-Jun)	Q2 (Jul-Sep)	Q3 (Oct-Dec)	Q4 (Jan-Mar)	Year To Date	24/25 Target	Top Quartile
RAG:		●	●	●		●	○	○
Performance:	1.78	1.57	1.51	1.44	N/A	1.44	1.82	2.38
Target (Max):	1.82	1.82	1.82	1.82	1.82	1.82	N/A	N/A
Total Arrears:	363,036	352,230	341,894	325,724	-	325,724	-	-
Annual Charges:	20,342,376	22,503,369	22,581,684	22,600,172	-	22,600,172	-	-

2.2. The key indicator for our performance in relation to Income is the Council’s rent arrears for current tenants as percentage of the annual rent we should be receiving.

2.3. If all of our current tenants paid 100% of their rent and service charges this financial year, we would receive a total income of £22,822,691.

2.4. At the end of Quarter 3, you can see that we have a current rent arrear figure of £325,724, which equates to 1.44% of the total income we could receive from our current tenants.

Whilst of course we would like all of our tenants to be paying all of their rent and charges, it is expected by all landlords that for various reasons there will be those tenants who cannot or do not meet with their obligations to pay.

2.5. Our target for rent arrears is to be at, or below, 1.82%. Therefore, the figure of 1.44% is extremely positive and demonstrates high performance from our Rentals team.

2.6. The top quartile for this area is 2.38%, therefore you can see that we are firmly seated as performing in the top 25% of landlords nationally.

2.7. You will also see that we finished FY 23/24 well within target at 1.6%, and performance has improved further this financial year. However, we do note that anecdotally we often see a small increase in rent arrears in Q4. This is often linked to a knock-on effect from the festive period where tenants have prioritised other expenditure above their rents.

2.8. Strong income collection performance is important to us as it gives us assurance around the level of income we can expect to generate year on year, giving us greater assurance around our budget setting and plans for investment and expenditure.

2.9. The Year to Date (YTD) figure for Income Collection is reported as a snapshot in time (ie, the most up to date figure at the time the report was ran). This is because the income collection figure is a cumulative figure throughout the year.

2.10. **Good News Stories from our Rentals Team:**

2.10.1. In the last quarter, the team have been working with a tenant whose arrears were increasing and court action was imminent due to us not being able to engage with the tenant and a sanction against their Universal Credit. The team persisted, and a Rentals Officer was able to arrange to meet the tenant in person at the Job Centre to support them to update their universal credit claim and have sanctions removed. This was successful, and the tenant is now back in receipt of full universal credit and a payment for arrears was made by UC.

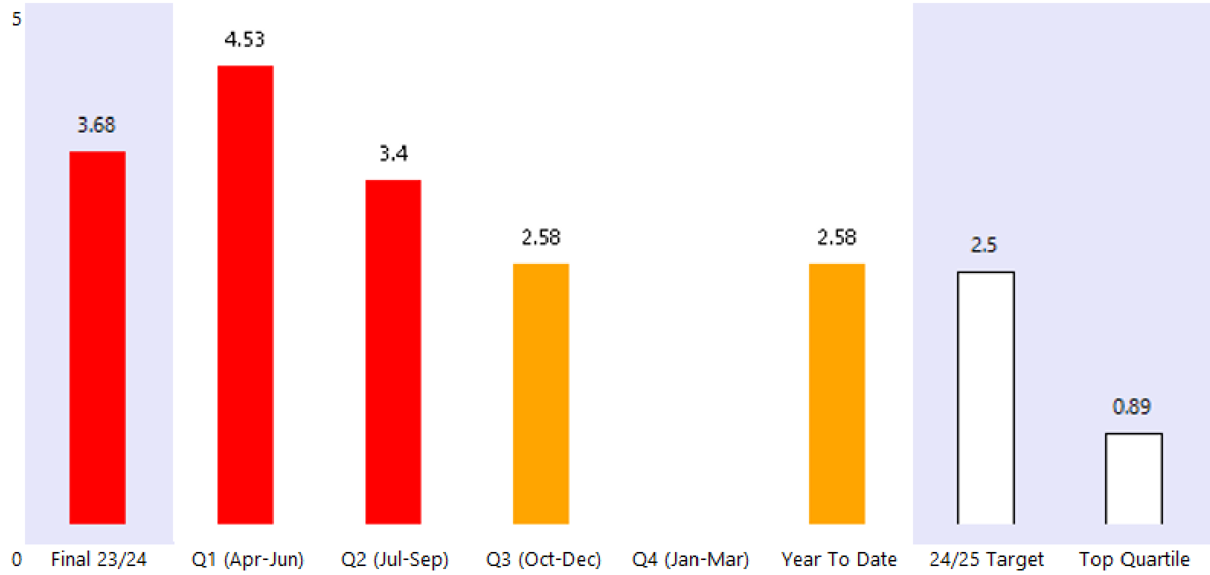
2.10.2. Upon visiting a tenant regarding their rent arrears, one of our Rentals Officers discovered a tenant who was struggling significantly with their finances and disclosed that they had over £28,000 of debts owing to various companies. The Officer supported the tenant to successfully apply for a Debt Relief Order (DRO) and set up an affordable payment plan for rent arrears.

2.10.3. One Officer made contact with a tenant regarding their rent arrears, and in the course of working with them the tenant disclosed a severe decline in their mental health due to needing to move home but being unable to because of the level of arrears on their account. The Officer worked closely with the tenant to support with budgeting and sticking to a payment plan, and upon paying off their arrears helped them to successfully apply for a new home, which they have now moved into!

2.10.4. So far this year we have managed to obtain financial grants for tenants of nearly £14,000 through EDDC's financial resilience team, and over £48,000 of financial gains have been achieved for tenants through referrals to Homemaker.

3. Income Lost Through Void Properties

3.1. Infographic; % of rent lost through properties becoming vacant:



	Final 23/24	Q1 (Apr-Jun)	Q2 (Jul-Sep)	Q3 (Oct-Dec)	Q4 (Jan-Mar)	Year To Date	24/25 Target	Top Quartile
RAG:								
Performance:	3.68	4.53	3.4	2.58	N/A	2.58	2.5	0.89
Target (Max):	2.5	2.5	2.5	2.5	2.5	2.5	N/A	N/A
Annual Loss:	777,117	1,067,466	795,715	598,173	-	598,173	-	-
Annual Potential Rent:	21,119,492	23,570,835	23,377,399	23,198,346	-	23,198,346	-	-

3.2. Aside from rent lost through current tenant's arears, the other key area of risk to our income collection each year is when our properties become void (empty).

3.3. All landlords plan for a level of turnover in their properties and we know that homes will be vacant whilst void repairs are carried out and therefore not generating income for us.

3.4. Unexpected levels of void loss can cause issues for our budgets and investment in our stock, so it is important that we balance the cost of bringing a property back to a lettable standard with the rent we will lose if we do not relet the property in a timely fashion.

3.5. The teams are working hard to finesse this balancing act, and this is apparent in the void-loss figures we are seeing at the end of quarter 3, continuing the trend of reducing this loss.

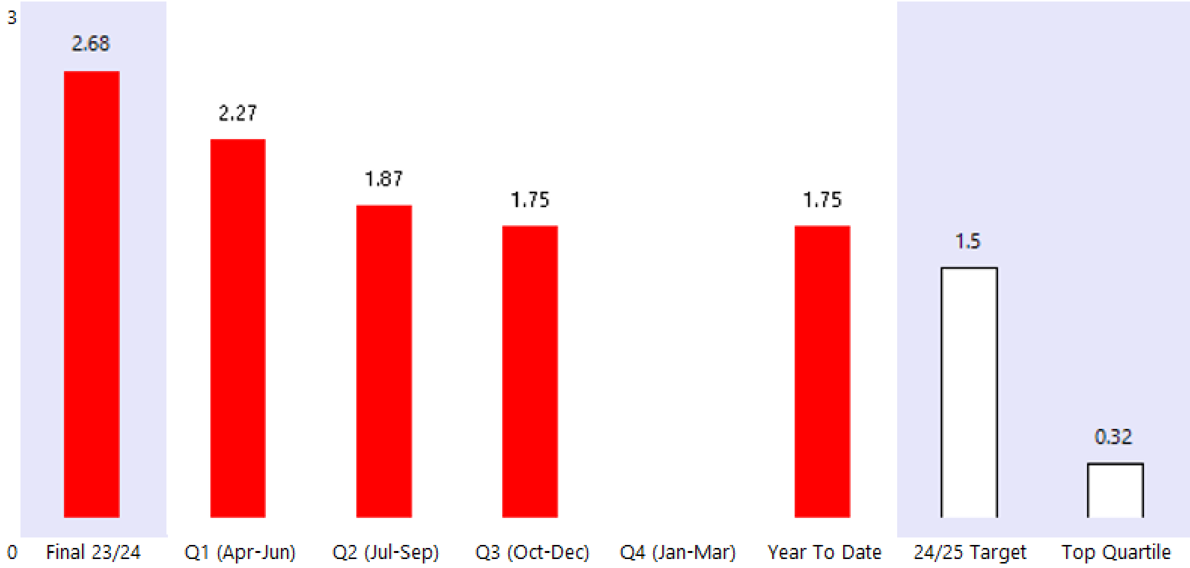
3.6. We can see that void loss spiked in quarter 1 of this year, however it has vastly reduced in quarters 2 and 3, bringing our year-to-date void loss figure to 2.58%. This is just 0.08% above our target of 2.5%.

3.7. Our void loss does continue to be significantly higher than the top 25% of landlords nationally, but the Housing Service and the HRB are aware of the challenges we have faced in this area and the journey we have been on to improve performance. Our target takes into account our stock profile and condition, and level of turnover, which will be significantly different to those landlords achieving top quartile performance. The continued improvement is evident through the performance data we are seeing today.

3.8. The quarterly % figure is calculated by taking what the annual loss would be if those properties remained empty for the whole year, divided by what our annual potential rental income could be, times by 100 to get the percentage figure. This is why the Year to Date (YTD) always mirrors the last quarter on the report as this is the most up to date calculation that takes into account actual rent lost, and potential rent lost if those properties remain vacant combined. The quarterly figures give us a strong projection for our end of year position if performance does not improve, but the true picture will never be known until the end of Q4.

4. Properties Vacant and Not Available to Let

4.1. Infographic; % of self-contained dwellings vacant and not available to let:



	Final 23/24	Q1 (Apr-Jun)	Q2 (Jul-Sep)	Q3 (Oct-Dec)	Q4 (Jan-Mar)	Year To Date	24/25 Target	Top Quartile
RAG:								
Performance:	2.68	2.27	1.87	1.75	N/A	1.75	1.5	0.32
Target (Max):	1.5	1.5	1.5	1.5	1.5	1.5	N/A	N/A
Lettable Dwellings:	4,137	4,134	4,128	4,117	-	4,117	-	-
Vacant Not Available:	111	94	77	72	-	72	-	-

4.2. Paired with the business need for us to be able to reliably target ourselves with an acceptable level of rent loss, is the need to manage the turnover of our vacant stock and try to ensure reduced numbers of vacant properties held by us at any one time. These two performance indicators naturally go hand in hand.

4.3. At the end of quarter 3 we had 4,117 lettable dwellings within the Housing Service. Of these, 72 were vacant but not ready to be let. This is a decrease of 22 from Q1 and 39 from the end of FY 2023/24. (It should be noted that the lettable dwellings figure can fluctuate over the year for a number of reasons, including disposals, right to buy, acquisitions, and properties taken out of management).

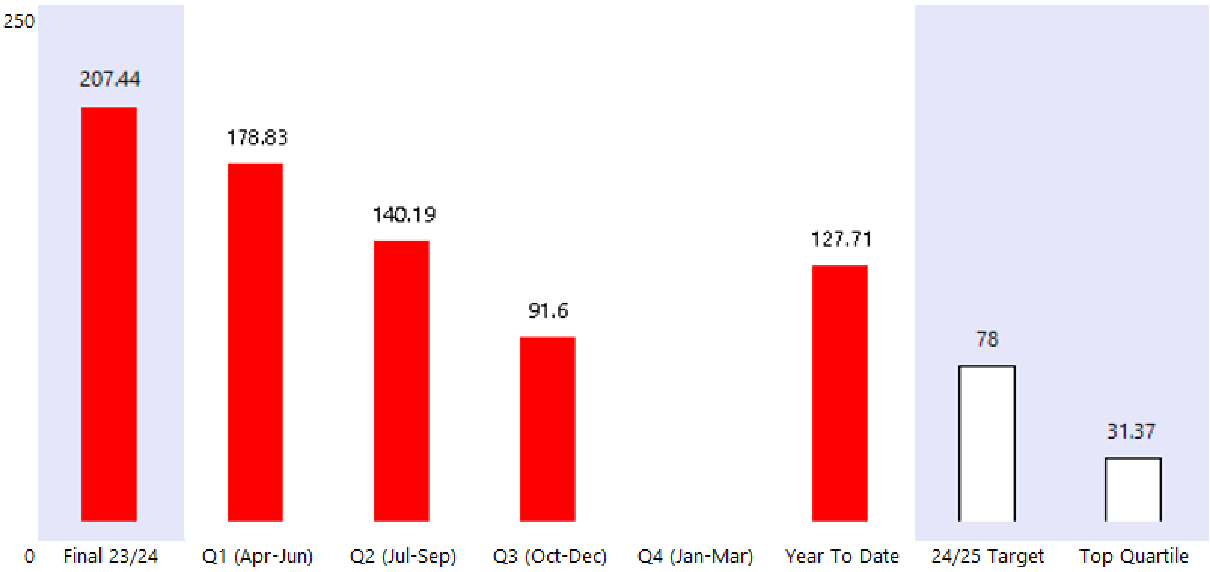
4.4. The 72 vacant, but not available to let, properties at the end of quarter 3 amounts to 1.75% of our stock. This is just 0.255% above our target of 1.5% and a 0.93% improvement on performance at the end of the last financial year.

4.5. Whilst we endeavour to have as few void properties at any one time, this figure should also be read in tandem with the data on how long it is taking us to relet our properties. This is because the number of void properties we have does not mean that these are the same void properties month on month. The following section explores our performance in relation to relet times.

4.6. The Year to Date (YTD) figure is reported as a snapshot in time (ie, the most up to date figure at the time the report was ran). This is because the figure is a cumulative figure throughout the year.

5. Average Days to Relet Homes

5.1. Infographic; Average days to relet a social housing dwelling (standard):

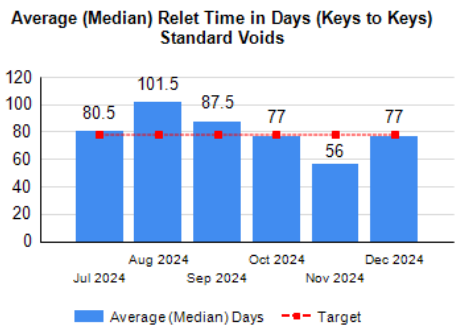


	Final 23/24	Q1 (Apr-Jun)	Q2 (Jul-Sep)	Q3 (Oct-Dec)	Q4 (Jan-Mar)	Year To Date	24/25 Target	Top Quartile
RAG:								
Performance:	207.44	178.83	140.19	91.6	N/A	127.71	78	31.37
Target (Max):	78	78	78	78	78	78	N/A	N/A
Standard Re-Lets:	235	23	36	45	-	104	-	-

5.2. At the end of Q3, the average number of days between a property becoming void and being relet is 91.6 days, bringing our year-to-date average to 127.71 days. Q3's performance is a vast reduction of over 48 days compared to Q2's performance, and a reduction of over 115 days from the average relet time at the end of FY 2023/24.

5.3. Our target is to bring our relet times within 78 days or less. Whilst we are still outside of this target, we are continuing on the downward trend and are seeing the best performance in this area than we have for the past couple of years.

5.4. It should also be noted that as we continue to clear long-term voids, the average days to relet will continue to be skewed by these properties but this will improve as the backlog reduces. Presenting the median can statistically 'smooth' out the extreme cases giving a 'clearer' picture of average relet times. The chart on the right shows you that in November we achieved a median of 56 days!



5.5. The Year to Date (YTD) figure is an average across the year so far.

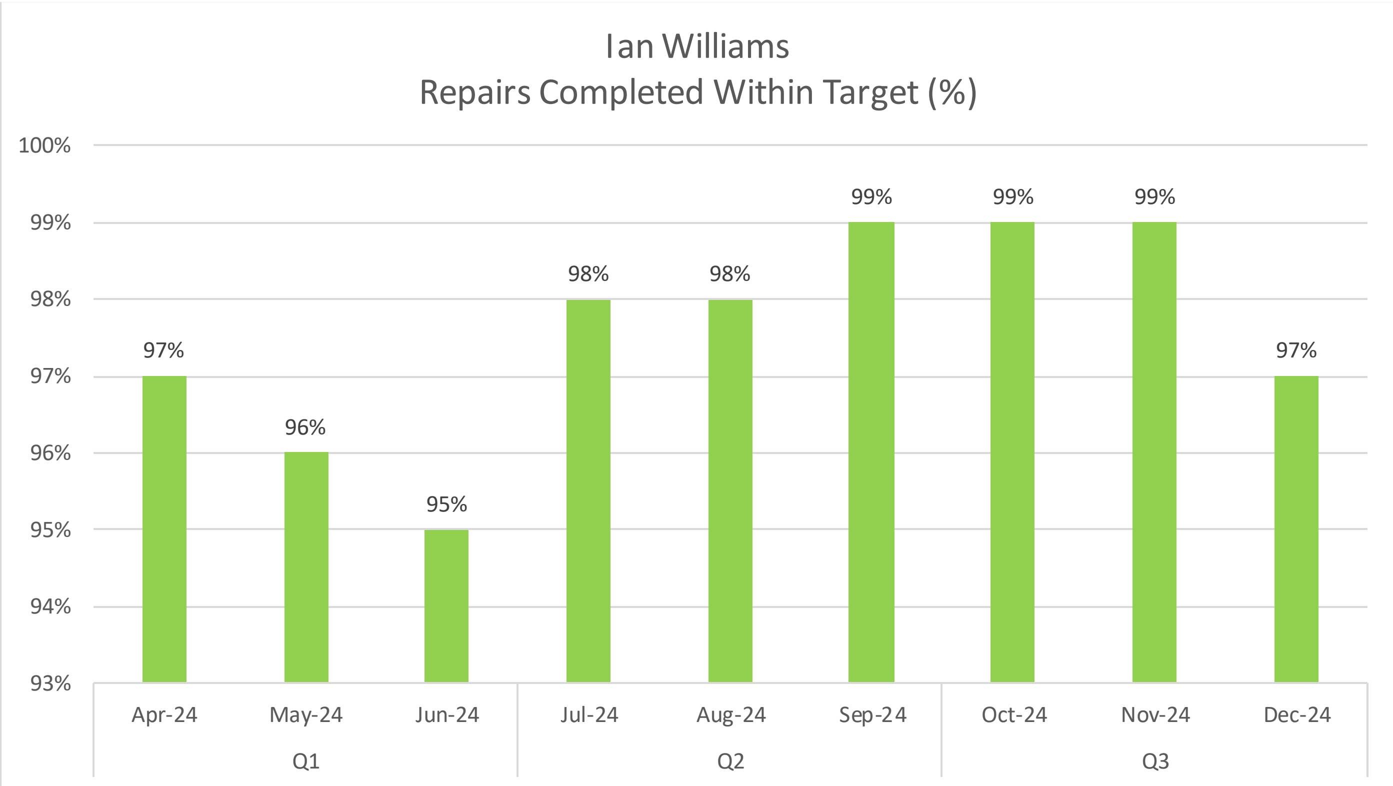
5.6. **Good News Stories from our Allocations Team and Voids Manager:**

5.6.1. We had a homeless family with two young children living in temporary accommodation. We were able to allocate them one of our void properties, however an issue was discovered with the gas meter that meant the property was uninhabitable until this was resolved. The supplier stated that their earliest appointment date was the 19th December, meaning the family would have to move in on the 23rd December. Understanding how important it was for the family to be moved in and settled in time for Christmas, our Voids Manager persistently contacted the supplier and, through her tenacity, was able to get the works completed a week earlier giving the family more time to move in and celebrate their first Christmas in their new home.

5.6.2. A couple living in private rented accommodation were served a Section 21 Eviction by their landlord and were unable to source suitable private rental options. One member of the household had complex medical conditions, including sight loss, which made the prospect of having to move their belongings into storage and stay in temporary accommodation even more daunting. We were able to act fast and ensure the void works on a 1-bedroom bungalow in our Sheltered Housing were completed in time, and the couple moved into their new home without the need to stay in temporary accommodation. They now have a security of tenure they did not have in private rented.

6. Repairs Completed in Target

6.1. Infographic; % of repairs completed within target:



6.2. Previous reports have noted that we are aware of a large discrepancy between our data and that of our contractors. This is due to the WIP (works in progress) between our systems not matching up, therefore causing our system to believe more works are outstanding than is true. Works are ongoing to address this issue within One Housing, however this is a manual process needing to be carried out by Officers in partnership with Ian Williams and Liberty Gas. Therefore, the above graph is demonstrating to you the performance as recorded by Ian Williams of combined routine and emergency repairs completion rates.

6.3. In Q3, Ian Williams' performance is broken down as follows:

6.3.1. Emergency Repairs Completed within Target: 99% (Target 100%)
6.3.2. Routine Repairs Completed within Target: 98% (Target 90%)

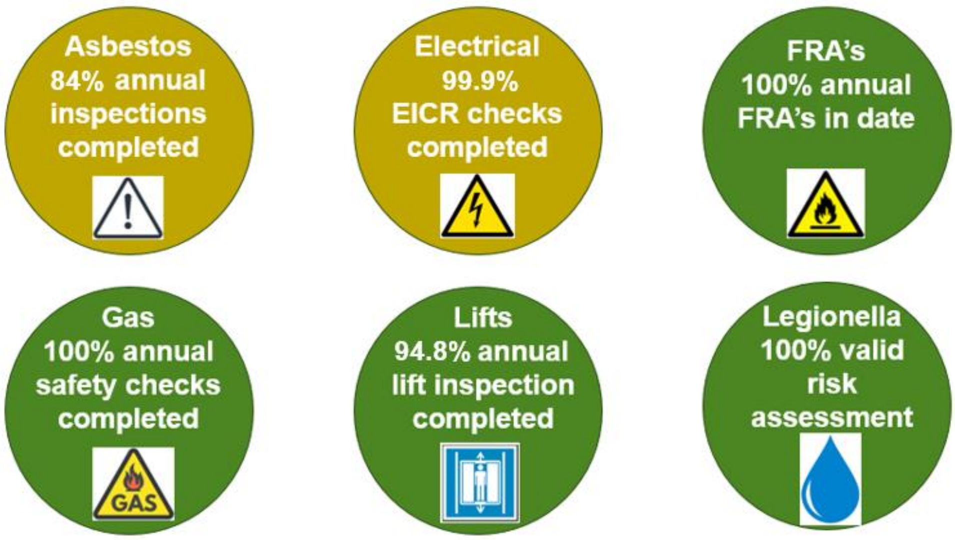
6.4. In Q3, 707 emergency orders were raised to Ian Williams, with 699 of these being attended to within target. 3,151 routine repairs orders were raised to Ian Williams, with 3,095 of these attended to within target.

6.5. So far this year, 13,379 repair jobs have been completed across both contractors.

6.6. We are trying to understand the best route to ensure our systems are producing the same data. As noted above, the current rectification process is very manual which requires a significant mount of Officer time and does not reflect the purpose of having automated and integrated systems. We continue to work on this, but at this time it is assessed that Ian Williams' data is more reliable than our own, hence its presentation to you in this report.

6.7. Unfortunately, we were unable to obtain the same detail for Liberty Gas in time for this HRB, but are aware of similar systems issues with our data.

7. Compliance



7.1. As a landlord, there are a number of checks, inspections, and risk assessments that we are required to carried out. All of these are annual, apart from our Electrical EICR's which are completed at each property every 5 years on a rolling programme.

7.2. 100% of the qualifying properties have received their Gas Check, FRA (Fire Risk Assessment), and Legionella Risk Assessment.

7.3. 84% of our annual Asbestos inspections have been completed. This is an increase from 57% at the end of Q2 and on target to have all inspections completed by year end.

7.4. 99.9% of the electrical checks due this year have been completed, with just one property outstanding at this time. This is an incredible achievement given the difficulties we sometimes face gaining access to some of our homes.

7.5. 94.8% of our lift inspections have been completed at the time of writing this report .These inspections became due at the beginning of January 2025 and are scheduled to be completed by the end of January 2025.

8. Planned Works & Adaptations

8.1. Aside from our work to maintain the homes in our stock, we also work to ensure that these homes remain suitable for our tenant's changing needs.

8.2. So far this year, we have received 370 requests for adaptations in our properties, broken down as follows:

This image cannot currently be displayed.

8.3. Adaptations works within our homes include:

- Bathroom Adaptations
- Wash/dry Toilets
- Accessible Kitchens
- Door Widening
- Aids for people with hearing loss
- Aids for people with sight loss
- Automation of doors
- Level access into properties
- Ramps
- Handrails and grab rails
- Lifts

8.4. Our adaptations team survey every tenant once works are completed, and so far this year are achieving 98% satisfaction.

8.5. **Good News Stories from our Planned Works and Adaptations Team:**

8.5.1. The team have been working with a family who have a disabled child with complex care needs that require specialist equipment and very specific adaptations to support them as the child grows older. The family were originally living in a first-floor maisonette, so an emergency move was made to a bungalow to alleviate some of the pressures the family were facing. However, this was not a long-term solution as the property still did not meet their needs nor adequately provide for the size of the family in the longer term. Many properties were assessed and considered, and we are pleased that a suitable option was identified within the EDDC stock and works are now in flow to transform the property. This will include the addition of a ground floor bedroom with wet room and hoist system, and an open plan living space with a kitchen designed for wheelchair access so that the child can continue to learn skills as they grow and participate in everyday family life.

8.5.2. Last year we had a fire in one of our properties. Luckily no one was hurt, and we were able to permanently rehouse the tenant. The planned works team worked swiftly with our insurance company to assess the damage and set about a full refurbishment of the property. The works were brought in 3 weeks early and under budget! Neighbours have provided us with compliments for how quickly the works were carried out with minimal disruption to their daily lives and how considerate and helpful the contractors were.

9. Complaints Handling

9.1. Infographic:

	Q1 23/24	Q2 23/24	Q3 23/24
No of stage 1 complaints received	60	60	69
Average response time for stage 1	31 days	17 days	13 days
%of new housing stage 1 complaints upheld	43%	48%	30%
%of new housing stage 1 complaints partially upheld	26%	21%	18%
%of new housing stage 1 complaints not upheld	31%	31%	52%
No of stage 2 complaints received	13	31	30
Average response time of stage 2	34 days	40 days	54 days
% of new housing stage 2 complaints upheld	61%	Incomplete	Incomplete
% of new housing stage 2 complaints partially upheld	15%	Incomplete	Incomplete
% of new housing stage 2 complaints not upheld	24%	Incomplete	Incomplete

9.2. The data for Q2 and Q3 Stage 2 complaints data is incomplete in some areas due to a significant backlog of complaint investigations and responses required from this period. This is due largely to the departure of our Property and Assets Service Manager and a reduction in senior level officers to review these cases, sign-off on judgements, and provide full responses. The complainants are being kept up to date regarding the progress of their complaint on a regular basis and progress is being made towards the end of Q3 into Q4 on reducing these numbers.

9.3. The data above does continue to show a pleasing improvement in the response times for Stage 1 complaints across the year. From 31 days at the beginning of the year reducing to 13 days in Q3, bringing us closer to the target of 10 days.

9.4. Since April this year, we have had 119 stage 1 complaints relating to repairs in tenant's homes. When you put this into the context of us having completed 13,379 repairs in the same period, this equates to a complaint level of 0.88%. This means that 99.12% of repairs have been completed without formal complaint from tenants; and of course, this does not take into account the complaints that we have not upheld which would lower the complaint level % even further.

9.5. The Housing Ombudsman continues to re-iterate the importance of response times falling in line with the new standards that have been set within the new complaint handling code. Excellent progress has been made in relation to responding to stage 1 complaints, this has confirmed that the change to have a designated team manager in the Property and Asset team only focusing on stage 1 complaints is working well.

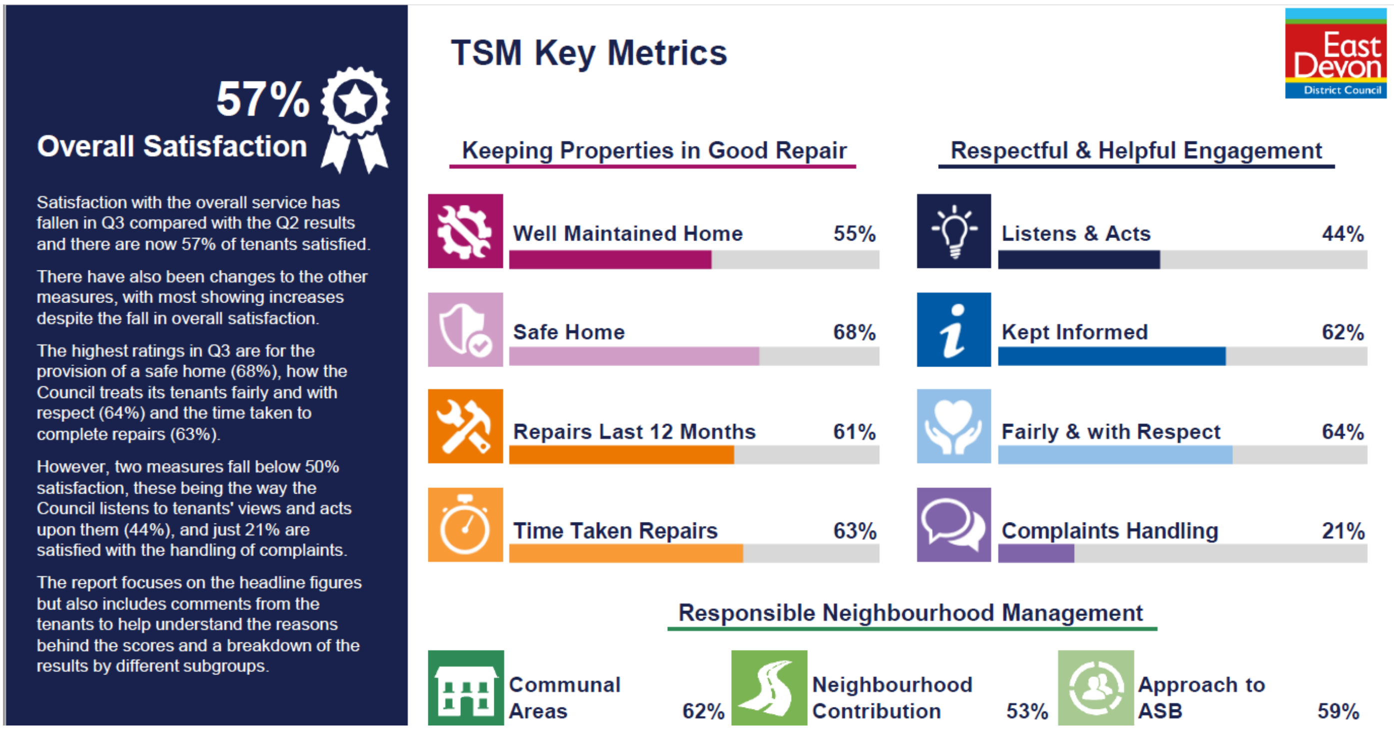
9.6. The Housing Performance Officer is continuing to support Service Managers with a diary system to ensure alerts and deadlines are managed through a calendar system. Weekly lists of outstanding complaints are also circulated at the beginning of each week in order to assist Officers with prioritising responses.

9.7. In the quarter 1 complaints report, we outlined ongoing work in relation to reviewing the internal processes that sit behind formal complaints. The first part of this work to map the current process is complete, however this work is now on hold, as directed by ELT, due to the opportunity for this area of service delivery to be managed through the new Corporate Performance System, this is continuing to be explored.

9.8. We recognise the improvements that need to be made in relation to improving our stage 2 response times.

10. Tenant Satisfaction Measures

10.1. The following shows the headline results of our Q3 TSM Survey:



10.2. The below analysis details each category questioned in the TSM Survey, showing how this compares between Q2 and Q3, and the change from the 2023/24 survey results:

Survey Area	*Q2 Result*	Q3 Result	+/- from 23/24 Survey	23/24 Benchmark
Overall Satisfaction	*63%*	57%	+4.3%	*72.3%*
Well Maintained Home	*65%*	55%	+8.6%	*72.2%*
Safe Home	*72%*	68%	+10.7%	*78.7%*
Satisfaction with Repairs	*60%*	61%	+9.5%	*74.5%*
Time Taken to Complete Repairs	*48%*	63%	+17%	*70%*
Landlord Listens and Takes Action	*43%*	44%	+4.8%	*61%*
Tenants are Kept Informed	*67%*	62%	+17.9%	*71.4%*
Treated Fairly and with Respect	*65%*	64%	+7.8%	*78.2%*
Satisfaction with Complaints Handling	*15%*	21%	+0.8%	*34%*
Communal Areas	*46%*	62%	+22.9%	*66%*
Contribution to Neighbourhood	*48%*	53%	+16.4%	*64%*
Approach to ASB	*47%*	59%	+22.6%	*57.6%*

10.3. As this is a live survey being completed throughout the year, we are aware that figures will increase and decrease as we move through. A number of factors can affect sentiment, such as a higher level of repairs reported and completed during winter, therefore likely to decrease satisfaction with the maintenance of their home, and we know that there is a true seasonal affect on positive survey results during winter periods.

10.4. With that said, there have been increase in tenant satisfaction in 7 of the measures since Q2, including the time taken to completed repairs (up 15 percentage points) and the upkeep of communal areas (up 16 percentage points), both of which are statistically significant changes.

10.5. Acuity, who carry out our surveys on the EDDC's behalf, have told us that around eight out of ten tenants in social housing continue to be concerned about the cost-of-living and this tends to affect the way they feel about the services they receive. Within EDDC's results, we see satisfaction increase with the age of the tenants, a similar trend to other providers, and those with the longest tenancies are often more satisfied than those who have been tenants for a shorter period of time.

10.6. Complaints handling tends to be the lowest performing measure for all landlords, which can be seen in the 23/24 benchmark figure of 34%. Whilst we are a way off achieving this, there has been a 6% satisfaction increase in Q2 and, as outline earlier in this report, work in this area is ongoing and focussed.

10.7. What we are seeing in our Q3 results is that, so far this year, we are showing improvements in all measures when compared with 23/24. Whilst no trend data for 2024/25 has yet been published, we know last year the general trend was an overall decrease in satisfaction measures across landlords. Therefore, it is pleasing to see a trend of continued increased satisfaction for EDDC tenants.

10.8. So far this year, we have received 350 completed surveys, which accounts for a sample of c.9% to date.