

This Report will be made public on 8 October 2019

Report Number **C/19/29**

**To:** Cabinet  
**Date:** 16 October 2019  
**Status:** Non-key decision  
**Responsible Officer:** Susan Priest, Head of Paid Service  
**Cabinet Member:** Councillor David Godfrey, Cabinet Member for Housing, Transport and Special Projects

**SUBJECT:** East Kent Housing  
Housing management: future options appraisal

**SUMMARY:** This report set out a headline options appraisal of future housing management options, taking into consideration the current arrangements between the four councils (Canterbury City Council, Dover District Council, Folkestone & Hythe District Council, Thanet District) and East Kent Housing.

**REASONS FOR RECOMMENDATIONS:**

There have been concerns regarding the performance of East Kent Housing in terms of asset management, procurement and the delivery of the capital programme for some time and more recently these concerns have been heightened by the apparent deterioration in tenant health and safety compliance. In July 2019, Cabinet agreed for an options appraisal to be undertaken regarding the future delivery of housing management in the district.

**RECOMMENDATIONS:**

1. To receive and note report C/19/29.
2. To approve the recommendation that the council's preferred option is to withdrawal from EKH and return housing management services back in-house under direct management of the council, subject to formal consultation with all tenants (and leaseholders) to satisfy the requirements of Section 105 of the Housing Act 1985.
3. To approve that council makes available up to £250,000 from the HRA in 2019/20 and 2020/21 (split to be determined) to support interim transition management costs, subject to option 2 being supported.
4. To approve for any minor amendments to the options and consultation documents to be delegated to the Head of Paid Service in consultation with the Cabinet Member for Housing, Transport and Special Projects.
5. To approve for the consultation results to be presented to Overview and Scrutiny Committee and Cabinet for consideration in early 2020.

## **1. BACKGROUND**

- 1.1 The four councils of Canterbury City Council, Dover District Council, Folkestone and Hythe District Council and Thanet District Council are neighbouring district councils located in East Kent. They collectively own over 17,000 dwellings, which are managed by East Kent Housing (EKH). EKH is an Arms-Length Management Organisation (ALMO), jointly owned, in equal share, by the four councils. EKH was established on 1 April 2011 and is managed by an independent board.
- 1.2 EKH is responsible for the management of the councils' housing stock (with landlord and freeholder responsibilities for leasehold stock), by way of a management agreement held separately with each council. In addition, an owners agreement sets out the relationship between the four councils, including arrangements for varying the terms of the management agreement or terminating the arrangements.
- 1.3 Each council holds its own separate Housing Revenue Account, providing both capital and revenue budgets covering the investment needs of their respective housing stock. EKH has input into the budget setting process and is responsible for managing these budgets and approving expenditure on stock investment, repairs and maintenance and health and safety, within the budget limits agreed by the councils. In addition, each council provides EKH with an annual management fee for the provision of the services.

## **2. INTRODUCTION**

- 2.1 The four client councils have raised concerns about a number of key areas of the services provided by EKH in relation to asset management, procurement and delivery of the capital programme. As a result, an Improvement Plan was developed in response to these areas of weakness that EKH have been unable to resolve. Additional investment has been provided by the four councils to EKH to improve performance in these areas and early indication is that significant improvement in some areas remains necessary.
- 2.2 Council concerns have been further exacerbated by serious health and safety compliance failings by EKH uncovered in May of this year in relation to Landlord Gas Safety Records (LGSRs). A backlog of gas safety certificates came to light when EKH received notice from its gas safety contractor that it was terminating its contract. This led to all four councils completing Section 5 monitoring officer reports due to non-compliance with legislation relating to tenant health and safety. By June 2019, the position in relation to LGSRs was recovered and the four councils had no properties with an outstanding LGSR. Gas safety inspections continue to remain up to date across all four areas.
- 2.3 East Kent Audit Partnership (EKAP) undertook a review of services for resident health and safety across all four council areas. This work formed part of the planned forward audit programme agreed by the councils for the

2019/20 year, with the specific work commissioned by EKH. EKAP's initial findings (in June 2019) raised major failings by EKH in relation to the internal control of health and safety (including faulty emergency lighting, carrying out electrical safety checks, fixing faults found in lift inspections and taking action following regular legionella risk assessments). EKAP recommended urgent management intervention in all key areas tested in their final report dated 19 July 2019. Immediate actions were undertaken by EKH to address high risk recommendations. A further audit opinion was sought by EKH and was provided by EKAP in August 2019, with both reports being formally considered by EKH Board on 22 August 2019. The EKAP opinion reported positive progress had been made on addressing a range of performance and health and safety problems affecting council housing across east Kent, for example, gas safety has now been given substantial assurance, with robust plans in place to tackle those that remain with additional budget demands being presented to address the necessary works.

- 2.4 Members of F&H DC received monthly updates relating to these matters through June, July and September, and full reports were made available to OSC on 10<sup>th</sup> September 2019 and to Audit & Governance on 18<sup>th</sup> September 2019, following consideration by EKH Board.
- 2.5 The four councils agreed to self-refer to the Regulator for Social Housing (RSH) on these matters. The RSH regulates registered providers of social housing to promote an efficient and well-governed social housing sector able to deliver homes that meet a range of needs. The councils have cooperated fully with the RSH investigation and continue to keep them fully informed on progress. In September, the RSH's investigation concluded that the four councils (under their statutory landlord responsibilities) were non-compliant, resulting in a Regulatory Notice being issued. The notice remains 'live' for 12 months or until full compliance is achieved.
- 2.6 As a result, EKH commissioned a review by the Housing Quality Network (HQN). The councils have raised areas of concern regarding the accuracy of some of the findings within the report, which EKH is currently reviewing. Similarly, the four councils have appointed Pennington Choices housing consultancy service and the resulting report and findings are due to be completed by late November 2019. It is important to understand what went wrong and lessons to be learnt in order to mitigate against any future risk and ensure those tenants living in council housing properties are safe and receive the best possible service.
- 2.7 In light of the above, over recent months each of the four councils has presented reports to their various governance groups explaining why they have concerns about the way in which EKH has been managing council owned homes. The recommendations flowing from each of these reports has been to review the potential future options for the management of the housing stock and to commence consultation with council tenants and other key stakeholders as soon as is practicable on these options. Ultimately, safeguarding the health and safety of its tenants is at the forefront of any future decision.

2.8 This report set out a high-level options appraisal of future housing management options, taking into consideration the current arrangements between the four councils and East Kent Housing. The appraisal highlights the advantages and disadvantages of the current management arrangements and provides the four councils with an opportunity to consider the implications of other business model options available to them.

2.9 The appraisal includes:

- a. A headline overview of the ALMO as a housing manager.
- b. A headline overview of potential future housing management options.

2.10 The review will consider each option taking into account the following factors and issues:

- Quality and safety of the service to tenants and leaseholders
  - Contractual obligations
  - Financial implications
  - Legal implications
  - Resources (staffing, TUPE issues etc.)
  - Performance
  - Governance
  - Clienting / corporate interface with the Council
- c. Recommendation – the appraisal provides a headline set of conclusions to allow the four councils to make an in principle decision on the future model for delivering housing management.

A high level analysis has been undertaken via a SWOT (strengths weaknesses, opportunities and threats) review of each of the potential future housing management options. However, this report proposes that the four councils may wish for a financial appraisal and risk analysis to be undertaken against any new service delivery model.

2.11 This report is the result of the work completed in respect of the above and has been a team effort involving a number of officers, including the four council client leads and EKH's Interim Director and Head of Finance, and in consultation with the council and EKH chief executives.

### **3. THE ALMO MODEL**

3.1 The Decent Homes programme of the 2000s saw the introduction of Arm's Length Management Organisations (ALMOs). When government first introduced ALMOs there were financial incentives for stock retaining councils to set them up. However, these incentives have not been in place for some years. At their peak in 2009/10 there were 70 ALMOs managing approximately one million homes. Since then, this number has reduced by more than half to 31 (as at December 2018).

- 3.2 Periodic reviews of ALMOs at appropriate contract break points are usually a trigger for bringing an ALMO in-house, although some authorities have taken the opportunity to retain or expand their ALMO at these points. Anecdotal evidence suggests that while perceived poor performance may be a catalyst for bringing services in house, political will and the relationship between the Council and the ALMO are also a factor.
- 3.3 Those councils that have taken back direct control of their housing have highlighted a desire to bring the service closer to democracy, provide clearer accountability and a strong customer focus to drive improvements and investment. Direct control of housing management ensures direct council accountability for tenants and leaseholders, helping to accelerate the speed of decisions and improvement where needed and more joined up services.

#### **4. OPERATING CONTEXT**

4.1 The four councils and EKH operate within an increasingly challenging environment, driven by recent and planned legislation, the roll-out of Universal Credit and the fundamental rethink of housing provision nationally and London-wide following the Grenfell fire. The Grenfell fire necessitated a nationwide response to fire safety, building design and management. The Hackitt report - Building a Safer Future - is a call to action for the whole housing industry to implement a universal shift in culture, with:

- Clear roles and responsibilities across the whole life-cycle of a building;
- A golden thread of compliance, with raised levels of competence in the inspection and maintenance of high-rise residential buildings and complexes, backed by stronger and more effective enforcement activity; and
- The residents' voice centre stage, to ensure a clear, quick and effective route for residents' concerns to be addressed, and they have assurance that effective systems are in place to maintain safety in their homes.

#### **5. EAST KENT HOUSING – BASELINE ASSESSMENT**

5.1 In 2011, the four councils established EKH under section 27 of the Housing Act 1985, delegating the management of its housing stock of approximately 17,000 homes. The precise scope of the relationship is defined through a Management Agreement.

5.2 The key features of the Management Agreement are:

- A high level list of functions to be delegated to, and carried out by EKH (are set out in Appendix 1)
- Arrangements for reporting on and monitoring performance
- Requirements for the involvement of residents in decision making
- Staff to be transferred under the TUPE Regulations
- The financial relationship and obligations of each party
- Arrangements for liaison and consultation between the council and EKH

- EKH's role in helping deliver the authority's housing strategy
  - The length of the agreement, which it is proposed be a 30 year period with five yearly break clauses
  - Actions to be taken where there is non-compliance or failure
- 5.3 Each Management Agreement was originally built around a Delivery Plan, (later replaced by the EKH Business Plan) and sets out EKH's responsibilities under the Management Agreement and its agreed performance priorities and targets.
- 5.4 Regardless of who delivers the service, as the landlord, the four councils are ultimately responsible for compliance with all statutory requirements. Tenants' rights and responsibilities are unchanged as they remain tenants and leaseholders of the council.
- 5.5 Estate profile: Canterbury City Council<sup>1</sup>  
As at 31 March 2019, the council owns 5,461 homes; mostly houses (45%), low-rise flats (44%) and bungalows (10%) across the area, with around 5,093 tenants and 388 leaseholders. This includes 1,017 sheltered or semi-sheltered accommodation properties. EKH also manages 38 Hostels on behalf of the Council. Around 36% of tenants are aged 60 or over and it is estimated that approximately 43% may have a disability or a vulnerability of some kind (based on the most recent resident survey).
- 5.6 Estate profile: Dover District Council  
As at 31 March 2019, the council owns 4,785 homes; mostly houses (48%), low to medium-rise flats (38%) and bungalows (13%) across the area, with around 4,298 tenants and 487 leaseholders. This includes 549 sheltered or semi-sheltered accommodation properties. Around 40% of tenants are aged 60 or over, and it is estimated that approximately 52% may have a disability or a vulnerability of some kind (based on the most recent resident survey).
- 5.7 Estate profile: Folkestone & Hythe District Council  
As at 31 March 2019, the council owns 3,619 homes; mostly low to medium-rise flats (44%), houses (43%) and bungalows (12%) across the area, with around 3,381 tenants and 238 leaseholders. This includes 1,021 sheltered or semi-sheltered accommodation properties. Around 48% of tenants are aged 60 or over, and it is estimated that approximately 56% may have a disability or a vulnerability of some kind (based on the most recent resident survey).
- 5.8 Estate profile: Thanet District Council  
As at 31 March 2019, the council owns 3,426 homes, mostly houses (51%), medium to high-rise flats (42%) and low-rise flats (7%) across the area, with around 3,033 tenants and 393 leaseholders. Around 26% of tenants are aged 60 or over, and it is estimated that approximately 47% may have a

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<sup>1</sup> Source: East Kent Housing. Stock data source taken from end of year (2018/19) financial accounts; the breakdown by property type is calculated from Northgate's 'all area property report'. Age data is taken from Northgate for all tenants where date of birth is known (14,375 or 95% of 15,188 total records). Disability data is taken from 2017 resident survey (1,609 respondents) and is therefore an approximation.

disability or a vulnerability of some kind (based on the most recent resident survey).

#### 5.9 Operating and governance model

The ALMO model creates an 'arms-length' and separate, sovereign body over which the four councils have very little direct control. However, the councils are ultimately responsible for the housing stock and the services provided to tenants.

EKH has to satisfy a number of stakeholders at the same time, including; tenants and leaseholders, EKH Board, the four councils, portfolio holders and the Owners Committee. It can therefore be difficult to achieve swift or any immediate consensus in decision making.

The EKH Board is made up of 12 members which includes four council members to represent each local authority, four independent members and four residents. The Board meets monthly and has responsibility for the governance of the organisation.

Reporting to the Board are a number of other committees including the local Tenant and Leaseholder Boards, Residents Panel, Service Improvement and Performance and Audit committees.

The EKH Board is led by a Chair and the company is managed by an executive team overseen by the EKH Chief Executive.

#### 5.10 Vision and Strategy

In 2015, EKH undertook a consultation to renew its 2020 vision, priorities and commitments to residents, involving staff, tenants, leaseholders, councillors and council colleagues.

EKH's 2020 vision is to be; *'Trusted by our residents, the councils and our staff to deliver a reliable service.'*

EKH's Business Plan sets out the organisation's strategic priorities under three overarching objectives to:

- Places people want to live
- Working in partnership with the councils
- Valuing and enabling staff and residents

#### 5.10 EKH staffing

When EKH was established in 2011, existing staff transferred from the four councils to EKH under TUPE with their employment rights protected. Formal consultation was undertaken with Unions and all affected staff. Staff transferred with their existing council terms and conditions including pay structures. EKH staff are currently dispersed across the four council areas with office space in all four councils and the main EKH Garrity House headquarters.

At the time of establishment in 2011, EKH staffing establishment was 204 FTE (equating to 243 staff members) at an annual cost of £6.182m.

Although over time some posts were lost (for example, the restructuring of the sheltered plus service in Canterbury meant that a large number of part-time staff were removed from the structure), others were created. The net effect of the establishment of EKH was expected to be a reduction in the region of 23 FTE (full-time equivalent) posts. As ever, the objective was to avoid compulsory redundancy and to redeploy and train staff to take on any new roles and responsibilities.

In 2017, EKH introduced a new operating model, aiming to provide improved service resilience covering the four council areas, alongside more localised area teams.

As at 31 August 2019, EKH's current staffing establishment is 179 FTE (equating to 198 staff members). 165 are permanent, with 33 being employed on a temporary/interim basis. Of the current 33 agency workers 5 are consultants on the IT single system project and 3 on fire risk work. As at 31 August 2019, the annual budgeted cost of the staffing establishment is £6.481m.

The figures above include further investment into EKH's income collection team by 12 FTE posts and extra resources to address recent compliance issues, agreed by the four councils in April and July 2019 respectively. EKH is current seeking a further £873,075 to support an additional 20.6 FTE posts for compliance and estate services. The current East Kent Housing organisation structure is attached as Appendix 2.

#### 5.11 Pension arrangements

East Kent Housing is treated as a separate employer for the purposes of the Kent Pension Fund and was granted admitted body status into the scheme. All staff were transferred to the pension fund as "fully funded" so that EKH would not commence trading with a pension deficit.

#### 5.12 Financial arrangements

The four councils retain responsibility for the strategic management of the Housing Revenue Account (HRA) and business plan and for the completion of annual returns. The councils also retain responsibility for undertaking new building and acquisitions under the HRA, as well as defining the housing allocations strategy and policy.

The overarching financial framework for East Kent Housing and the financial arrangements between the councils and EKH are set out in Schedule 6 of the Management Agreement (annexed as Appendix 3). This includes key issues such as pension arrangements, the mechanisms for the calculation of the management fee and for its payment, the treatment of surpluses on the management fee, the division of responsibilities for different transaction types, and the monitoring and reporting mechanisms that will apply.



The annual management fee for each local authority since 2011/12 is shown in the table below.

Table 1: Annual Management Fee<sup>2</sup>

	<b>CCC</b>	<b>DDC</b>	<b>FHDC</b>	<b>TDC</b>	<b>TOTAL</b>
<b>2011/12</b>	£2.945m	£2.309m	£1.785m	£1.589m	<b>£8.628m</b>
<b>2012/13</b>	£2.880m	£2.036m	£1.874m	£1.369m	<b>£8.159m</b>
<b>2013/14</b>	£2.888m	£2.104m	£1.844m	£1.302m	<b>£8.138m</b>
<b>2014/15</b>	£2.953m	£2.186m	£1.880m	£1.305m	<b>£8.324m</b>
<b>2015/16</b>	£3.073m	£2.249m	£1.917m	£1.323m	<b>£8.562m</b>
<b>2016/17</b>	£3.026m	£2.252m	£1.931m	£1.323m	<b>£8.532m</b>
<b>2017/18</b>	£3.027m	£2.197m	£1.931m	£1.324m	<b>£8.479m</b>
<b>2018/19</b>	£2.910m	£2.197m	£1.931m	£1.324m	<b>£8.362m</b>
<b>2019/20</b>	£3.094m	£2.359m	£1.949m	£1.506m	<b>£8.908m</b>

Detailed work was undertaken by the four councils in setting the original management fee based on original council staffing costs prior to the transition. Area based costing methodology has since been considered, but not progressed.

The 2016/17 Housemark<sup>3</sup> benchmarking data showed that East Kent Housing continue to provide their services at a comparatively lower cost than all others in their peer group.

As Table 1 demonstrates, East Kent Housing has not benefited from substantial increases in the management fee, for example, increases in line with inflation measures such as the Consumer Price Index (CPI). For a number of years, staff cost increases or pay awards were directly absorbed by EKH and this has been addressed recently with a proportion of the additional funding made available for the Improvement Plan for this purpose.

Any proposed future operating model, should be considered against each council's HRA Business Plan in terms of viability and sustainability.

### 5.13 Performance - overview

In response to a number of significant performance concerns, in early 2019, an Improvement Plan was proposed by EKH and approved by the four councils. The plan reflects arrangements and issues that have changed or come into being over the life of the existing contract. As a result, the four councils collectively agreed to further investment (£800k in total across all four councils) to be reviewed in September 2020.

The improvement plan identified key areas of concern related to:

<sup>2</sup> Source: Local Authority HRA Business Plans

<sup>3</sup> Source: <https://www.housemark.co.uk/media/1580/customer-excellence-benchmarking-report.pdf>

- Procurement of key contracts for the delivery of the council's planned maintenance and capital improvement programmes
- Contract management of a number of key contracts
- Rent collection, particularly in relation to tenants in receipt of Universal Credit
- Single System implementation
- Organisational health and sustainability

Whilst progress has been made in several areas, some important and serious concerns remain. A key concern was the performance of the planned maintenance programme, which remains substantially under-delivered. Significant contract management weaknesses were also highlighted through EKAP's recent audit investigation, including failure to detect and challenge poor performance by contracts, a failure to challenge potential overcharging by contractors and a failure to detect and challenge a pattern of charging that may suggest potential fraud.

EKH has received additional funding from the councils by way of an increase in the management fee to improve its procurement performance. However, at present, EKH remain heavily reliant on the councils for procurement support and guidance.

The single IT system project is considered to be critical to the long-term delivery of the services provided by EKH. The system will enable more flexible working, enhance online services for residents and unlock efficiency savings. The single system includes modules for rents and voids; planned maintenance and repairs; and leasehold and service charges.

The single system project complexity was grossly underestimated by EKH, due to the bespoke nature of each of the 12 modules to cater for different output requirements. This has resulted in a final estimated expenditure of £2.3m, compared to the original budget of £1,113,333. The second phase of the project (repairs and maintenance/invoicing) is still to be completed, with EKH suggesting a target delivery of November 2019, bringing the project delay to two years in total.

Of the £2.3m total expenditure, EKH has delivered organisational efficiencies to fund £1m from its own resources and borrowed £1.3m from the councils. The loans are scheduled to be repaid from EKH budgets, which include the transfer of £147k of existing council systems budgets by April 2026. A further £370k above the original budget was requested by EKH and approved by the four councils in 2017.

It should be noted that the single system was set up with four separate data areas for each council, future proofing any council's move to a different operational model going forward and protecting any GDPR implications (e.g. tenant records). EKH is current procuring a new document management system to support the single system. This would need to be carefully looked at as part of any transition plan to a new model of housing stock management before it is progressed further.

As reported earlier, in May & June 2019, significant performance issues were reported by EKH to the four councils in relation to Landlord Gas Safety Records (LGSRs). The position in relation to LGSRs has now been recovered, ensuring the councils have no properties with an outstanding LGSR. However, as a result, the councils undertook to self-refer the matter to the Regulator for Social Housing (RSH), resulting in a Regulatory Notice being issued in September, concluding that the councils had been collectively non-compliant with regard to gas safety compliance. EKH has since commissioned the Housing Quality Network (HQN) to undertake an independent investigation into gas safety across its housing stock. The report was presented to the EKH Board on 22 August 2019 and the councils have challenged a number of the findings. The four councils have also commissioned their own independent investigation, with this work due to be completed by late November 2019. The councils continue to work closely with the RSH to ensure continued compliance. The matter has challenged the relationship and trust between council members, officers and EKH as a result of a decreasing standard in contract and performance management and adherence to statutory health and safety compliance.

EKH is working collectively with the four council S151 officers to identify the additional staffing resources required to address these issues. However, initial estimates identifies an initial financial investment in excess of £1m across the councils, which may rise as a result of ongoing compliance works.

EKH continues to perform well in rent and service charge collection and rent arrears for F&H remain comparably low. EKH monitors overall tenant satisfaction levels with its services each year, demonstrating relatively good satisfaction levels being recorded each year. Its local tenants and leaseholder groups and independent living forums are well attended and play an active role in continued tenant and leaseholder engagement.

In conclusion, serious issues regarding performance, compliance and procurement by EKH have had a detrimental impact on the trust in operating the model. This has resulted in a general loss of confidence in EKH by the four authorities, whose priority remains that tenants and leaseholders living in council housing properties are safe and receive the best possible service.

#### 5.14 Capital programme

Despite progress in recent months on a number of procurement projects there remains concern about the speed of delivery of the approved capital programme and EKH are again reporting slippage. It is evident that there have been staffing restructures within the property side of EKH services, with a current reliance on a number of interim appointments. However, the complexity of governance between the four councils and EKH has hindered the speed of progress and change to procurement, with decision-making often a complex and lengthy process due to conflicting views and requirements. It is unclear whether any significant benefit has been delivered through joint procurement as applied in this model.

## 6. FUTURE OPTIONS ANALYSIS

6.1 Four options have been considered as part of this report's analysis:

**Option 1:** Retain and refocus the current EKH ALMO arrangement.

**Option 2:** Withdraw from EKH and return the provision of housing management services back in-house under direct management of each council.

**Option 3:** Withdraw from EKH and form a new shared housing service with one or more of the other councils (this would not be an ALMO).

**Option 4:** Withdraw from EKH and outsource the service to one or more external providers.

6.2 Whichever management option each of the four councils chose for the future management of their housing services, the immediate priority for the service remains tenant safety, operational recovery and rebuilding stakeholder confidence, whilst reappraising service goals and delivery mechanisms.

### 6.3 Option 1: Retain and refocus the current EKH ALMO arrangement

6.3.1 This option involves continuing with the current delivery model and retaining EKH.

6.3.2 A summary of the option is set out below.

<b>Strengths</b>	<b>Weaknesses</b>
<ul style="list-style-type: none"> <li>• Lower level of risk as no major change of structure needed and can start refocusing service immediately</li> <li>• Least complex of the options</li> <li>• No requirement to consult with tenants</li> </ul>	<ul style="list-style-type: none"> <li>• Acceptance that strategic control will be limited to actions agreed in the delivery plan</li> <li>• Loss of trust with council elected Members and officers - the last year has critically damaged EKH's credibility with stakeholders in terms of health and safety non-compliance and poor operational performance</li> <li>• Operations, procurement and contract management arrangements are not deemed robust enough to deliver any improvement plan</li> <li>• Inherent layer of management remains between EKH and four Councils</li> <li>• Complete overhaul of the operating model is probably required</li> <li>• Failure to contribute effectively to delivering the four council's wider corporate and service goals</li> </ul>
<b>Opportunities</b>	<b>Threats</b>

<ul style="list-style-type: none"> <li>• Improving governance arrangements for EKH</li> <li>• Strengthened client-side function within the Council</li> <li>• Scope for making performance gains and service innovations (but would require significant council investment)</li> <li>• Reintroduction of a prescriptive delivery plan, setting out Council objectives and targets</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing and significant council investment required to address poor levels of performance and non-compliance</li> <li>• Levels of performance and compliance may not recover to former levels</li> <li>• Anticipated service/performance may not be delivered</li> </ul>
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6.3.3 EKH was established on 1 April 2011 and is now in its 9th year of operation. Whilst EKH has operated effectively at ‘arm’s-length’ within the terms of its original Management Agreement, and has delivered relatively efficiently over the past 9 years, the implementation of a new operating model in 2017 has stretched the trust and belief in the organisation.

Lines of communication have become less clear with shortcomings in governance, compliance, performance, as well as in EKH culture. For EKH to be considered as a fully credible retained delivery vehicle for the housing service moving forward, a significant refocusing of many aspects of the operation would be needed. This would create a ‘new deal’ for current and future stakeholders of the housing service across the four councils, based upon a clear scope of service and sustainable service specification with refreshed governance and clienting arrangements to provide a more robust level of oversight and challenge, and closer partnership working with the four councils and external delivery partners.

EKH has identified the additional staffing resources required to address recent performance issues, estimating an initial, additional financial investment in excess of £1m across the four councils. However, if it was agreed to refocus the EKH model, this would require development and implementation of a detailed plan, which may incur additional one-off implementation costs and a potential increase in the annual management fee.

For this approach to work, the relationship between the four councils and EKH would need to be reset through the governance and clienting structures. The strength of this option is that it maintains continuity and avoids any possible loss of focus. However, the main risks associated with retaining the ALMO are the very likely additional management cost of the model, the dependency by the four councils upon an effective relationship with EKH to deliver key service objectives, and the lack of control that the authorities can exert upon the model even though they retain overall legal responsibility and accountability for failures to deliver in important areas such as health and safety compliance and procurement.

**6.4 Option 2: Withdraw from EKH and return the provision of housing management services back in-house under direct management of each council**

6.4.1 This option involves terminating the Management Agreement with EKH, winding up the company, and returning the housing service to direct control and management by each of the four councils.

6.4.2 A summary of the option is set out below.

<b>Strengths</b>	<b>Weaknesses</b>
<ul style="list-style-type: none"> <li>• Direct control and direction of the service sits with each individual council, making it more responsive at a time of considerable operating challenge</li> <li>• Enables faster and more responsive decision-making across all housing services through a single integrated management structure in each council</li> <li>• Clienting and duplicated specialist support posts can be deleted</li> <li>• Service improvements can be shaped and delivered locally</li> <li>• Potential savings can be made in removing a layer of management</li> </ul>	<ul style="list-style-type: none"> <li>• The transition process may deflect management attention</li> <li>• Resident accountability may be weakened, and an alternative engagement structure would be needed</li> </ul>
<b>Opportunities</b>	<b>Threats</b>
<ul style="list-style-type: none"> <li>• Opportunity to realign delivery and clienting arrangements more broadly across each council's housing service to achieve service objectives</li> <li>• The service can be aligned to deliver broader corporate service goals and objectives</li> <li>• Opportunity to engage and renegotiate the offer to residents</li> <li>• Opportunity to renegotiate contracts EKH has entered into contracts with other organisations (apart from with the Council itself) for the provision of services or works</li> </ul>	<ul style="list-style-type: none"> <li>• Housing management focus is lost as the service is absorbed into a service with wider spans of control</li> <li>• Performance may dip again as the transition is made</li> <li>• Key staff may decide not to transfer back into the four councils</li> <li>• Single System only partially implemented – would require full implementation and ensure a form of shared management</li> </ul>

6.4.3 The aim of returning the housing management service to the four councils would be to achieve more cost-effective and better aligned service delivery with each council. This should ensure that the service could better meet

future challenges of increasing growth, addressing vulnerability, and responding to opportunities. Direct council control and co-ordinated decision-making should assist in addressing broader challenges in a climate of change.

- 6.4.4 Consideration would need to be given to the high level list of functions currently delegated and carried out by EKH as part of the Management Agreement (see Appendix 1) and how these could be configured in-house and aligning to existing functions. The four councils would need to consider other activity to be undertaken to refocus the service and deliver this option. Timing is another consideration, as if any of the four council pulled out of the ALMO early, this would create an additional financial burden on the remaining councils and potentially legal cost liabilities.

6.4.5 Organisational design considerations

If the service is brought back in-house, it will be necessary to decide where it is located and how it would be managed within each of the council's organisational structures. Careful consideration needs to be given to how each council's strategic objectives would be best met; how the proposed new service model would be best implemented, and how broader service alignments would be realised.

6.4.6 Resident engagement considerations

If the councils decide to bring services back in-house, it is recommended it is linked to a clear and coherent 'offer' to residents. A decision to bring back the service into each council ought therefore to be couched strongly in terms of what improvements it will deliver. Such a message can be fashioned, based on positive and strong strategic integration. Council tenants will want to know who is going to be managing and maintaining their homes, and how this is to be delivered.

In summary, Government guidance suggests that when councils with ALMOs are seeking to propose significant change to their housing management arrangements, they are required to carry out a consultation exercise 'proportionate' to that which informed the original decision to establish the ALMOs. This does not necessarily mean a direct recreation of the process. Budgets and communications techniques have both changed considerably in the last decade. Consultation will need to focus on utilising the communication methods which we know generate higher levels of stakeholder involvement, and in particular tenant engagement. This will mean a mix of direct mail, face to face presence and information distributed through traditional web and social media. Tenants and leaseholders will also be supported to engage in the process, and key partner organisations (e.g. Samaritans) will also be advised so they can offer the necessary support should queries be raised.

As part of the consultation process, the councils should commit to giving all tenants a say in how their council homes are managed. This will allow the

councils to test overall opinion on the recommended option. Consultation will ensure tenant:

- Understand why a review has been necessary as a result of poor EKH performance and failures in tenant health and safety compliance.
- Understand the benefits of returning the service back to the direct control of the councils, including more investment, safer homes, greater tenant involvement and more accessible services.
- Provide their views on services currently provided by EKH and make suggestions for improvement.
- Give their opinion on supporting a withdrawal from EKH and reintegrating the housing management service back to each individual council.

The proposed consultation (see Appendix 4) complies with the Social Housing Regulator's 'Tenant Involvement and Empowerment Standard', ensuring tenants are given the opportunity to influence and be involved in the making of decisions about how housing-related services are delivered; and, the management of their homes, where applicable.

As the proposal does not involve the delegation of the council housing management function, no approval from the Secretary of State is required to bring the housing management function back in-house. However, the non-statutory guidance suggests that any council considering taking an options review of its housing management should contact MHCLG as soon as possible in the process.

If Option 2 is formally progressed, more detailed consultation and briefings would need to be worked up with EKH staff, union representatives and elected members.

#### 6.4.7 Financial considerations

EKH is 100% owned by the four councils. Consequently, if the service was transferred back in-house and EKH closed down, the four councils would take on all of the assets and liabilities of EKH. Most of these impacts would be felt directly on the Housing Revenue Account (HRA), but there are broader corporate implications as well. In this event, certain roles and functions would no longer be required, but in transferring the services across, it will be important to distinguish between those functions which are no longer required, and those which the four councils might choose to deliver differently under any internal restructuring.

It is recommended that a financial appraisal is undertaken. The impact on the HRA for bringing the housing management service back in-house would be dependent on approach to the strategic management of the service which would be taken within each council, the rationalisation of support services currently delivered and how any service duplications would be reorganised.

Offset against these efficiencies would be one-off costs associated with the transfer of the service back to each council, including legal fees and the



costs of integration of any additional work needed to assist with the change. Redundancy costs are more difficult to forecast at this stage as it is dependent on the pay, length of service and age of employees subject to redundancy. A more detailed evaluation would be necessary once the revised structures had been considered. These costs could potentially be absorbed by the HRA balances, without having any direct impact on budgets for existing services.

The current charging for services to the HRA, and consequential income to General Fund would need to change to reflect a new way of managing the housing service and revised organisational structure.

#### 6.4.8 Implementation costs

The four councils would incur additional implementation costs if they choose to return EKH services to their direct control. There are a range of redundancy, pension fund, legal and transfer of liability considerations that will require more detailed analysis before proceeding. It is recommended that more rigorous analysis and costings would be required if the four councils were to choose this course of action. However, implementation cost items may include:

- An implementation team to plan and deliver the changes required
- Legal advice and the transfer of any assets (where applicable)
- Pensions and actuarial advice, in connection with the transfer of pensions liabilities
- Allowance for potential redundancy payments
- IT and hardware costs (e.g. software licences, document management, laptops, telephones etc.)
- Impact on existing council resources e.g. HR, client services, procurement, estate management, community safety (ASB) and housing

#### 6.4.9 Legal considerations

On 1 April 2011, each of the four councils entered into a separate Management Agreement with EKH for a period of 30 years. The Management Agreement entitles the councils to end the agreement on the 5<sup>th</sup>, 10<sup>th</sup>, 15<sup>th</sup> and 25<sup>th</sup> anniversaries of its commencement. This means that the next date that the Council could end the Management Agreement would be 1 April 2021.

However, the councils could seek, unilaterally or collectively, to end the contract based on the grounds of material breach or contractual failure. If acting collectively, the councils could bring about a members voluntary liquidation of EKH, or a voluntary strike-off or dissolution. Further legal advice will be taken as decisions are made.

In returning EKH to the control of each of the four councils the following issues should be considered:

- a. If the councils wish to follow the voluntary dissolution, material breach of contractual failure routes, it will be important to establish this as early as

- possible, so that the EKH Board can be advised of their obligations under the chosen process.
- b. The four councils will need to decide how to end the Management Agreement. Much will depend on timing, for instance - will timing work with a natural 'break' in the Management Agreement (the next contract break is 1 April 2021), or will the councils decide to disregard the terms of the Management Agreement and terminate regardless.
  - c. Bringing the services currently performed by EKH in-house will trigger the Transfer of Undertakings (Protection of Employment) Regulations 2006 (as amended) (TUPE), under which all employees who are "wholly or substantially employed" in the undertaking will have their employment transferred.
  - d. The councils will have to finalise consultation with their residents on any reintegration proposal. Under section 105 of the Housing Act 1985, the councils will be required to consult where any matters relating to the housing management of properties let by the four councils on secure tenancies. Such matters would include the management, maintenance and provision of services or amenities. The proposed change is likely substantially to affect either all or a distinct group of the four council's secure tenants.
  - e. Each council would need to consider the impact on its General Fund of any closure of EKH (and in particular the consideration of central service recharges to EKH and any savings that might be realisable were the housing management service brought back in-house) in that the housing service would remain subject to the statutory 'rules' that apply to the HRA in the Local Government and Housing Act 1989.

#### 6.4.10 Transition process

A robust and appropriately resourced transition plan would be required to manage the transition process. In outline, the principal activities for each of the councils to undertake, if they opt to bring the housing service back in-house, will be as follows:

- a. Determining each council's offer to tenants and leaseholders, in terms of how the services will operate and be delivered, and how these will feel different and better for residents
- b. Planning and conducting resident engagement
- c. Setting up a senior level Project Board drawn from each council with EKH to oversee and direct the transition
- d. Determining the new corporate structure
- e. Reviewing the staffing structure of the service
- f. Reviewing the interface arrangements between relevant EKH systems (e.g. the Single System) and any corresponding council systems
- g. Consulting staff on the proposed TUPE transfer and how this will affect them
- h. Reviewing any pension liabilities
- i. Taking steps to ensure, so far as practicable, that the services of key senior and technical staff of EKH are retained
- j. Planning a phased migration of contract management services to each council, so as not to compromise the recovery in service response times

- k. Making contingency plans to deal with any potential problems or service failure during and following the transition, in respect of the housing management service
- l. Arranging that all works, services and goods contracts with EKH are novated to the four councils
- m. Putting in place a comprehensive communications strategy and plan to ensure that tenants and leaseholders, council Members, officers and external partners are clear on the changes being implemented and their implications for their engagement with the new housing management service
- n. Developing and implementing a new model for resident engagement that enables tenants and leaseholders to help shape and scrutinise service delivery in a meaningful way.

#### 6.4.11 Transfer of Undertakings (Protection of Employment) Regulations 2006 ("TUPE")

The purpose of TUPE regulations is to preserve continuity of employment and to safeguard employment rights of all employees whose employment transfers to a new employer as a result of a relevant transfer. Dismissal of staff that are protected by TUPE will be automatically unfair unless there are valid economic, technical or organisational reasons. Any changes to terms and conditions of employment which are related to the transfer will be invalid unless the changes are made for economic, technical or organisational reasons entailing changes in the workforce.

In brief TUPE will apply where there is a transfer of a business involving the transfer of an "economic entity" that retains its identity upon transfer, or when there is a service provision change under which services are either contracted out or brought back in-house.

There is an obligation under TUPE to inform and consult with trade unions in good time before a transfer takes place.

In reaching decisions on these matters, the four councils are bound by the general principles of administrative law. Lawful discretions must not be abused or fettered and all relevant considerations must be taken into account. No irrelevant considerations may be taken into account, and any decision made must not be such that no reasonable authority, properly directing itself, could have reached.

### **6.5 Option 3: Withdraw from EKH and form a new shared housing service with one or more of the other councils (this would not be an ALMO)**

- 6.5.1 Some of the councils may consider a shared service arrangement with a neighbouring authority, in a similar vein to the highly successful shared waste contract between Dover and Folkestone & Hythe councils. A shared service arrangement would support shared management, staffing, systems and commissioning responsibility with a neighbouring authority. The shared

service would be controlled by the participating authorities and have its own identity and governance arrangements.

6.5.2 The majority of the changes are as for the reform of EKH, except that the councils wishing to pursue this option would need to take the steps for dissolution of the ALMO.

6.5.3 A summary of the option is set out below.

<b>Strengths</b>	<b>Weaknesses</b>
<ul style="list-style-type: none"> <li>• Direct strategic and operational control</li> <li>• Improves efficiency and delivers more significant economies of scale</li> <li>• Integration of the housing service with the council and its other services</li> <li>• Governance and accountability would flow through the council's corporate management and committee processes</li> <li>• Greater focus on the housing service and the contribution it can make to the council's wider strategic agenda</li> <li>• Process is not excessively complex</li> <li>• No need for Secretary of State permission to return the service in house</li> </ul>	<ul style="list-style-type: none"> <li>• Possible loss of purchasing flexibility and control on the part of individual local authorities</li> <li>• Unrealistic expectations about what shared posts will deliver, so managing expectations is critical</li> <li>• Perception that councils are not in direct management control</li> </ul>
<b>Opportunities</b>	<b>Threats</b>
<ul style="list-style-type: none"> <li>• Potential to minimise duplication of services</li> <li>• Increases purchasing power that results in procurement savings</li> </ul>	<ul style="list-style-type: none"> <li>• Cultural/political differences between management teams and elected members across different local authorities can be a barrier to effective joint working. Any political differences of elected members could prove a potential problem</li> <li>• Where different local authorities are being brought together and terms and conditions are harmonised, there may be equal pay implications</li> </ul>

6.5.4 Much of the considerations outlined in section 6.4 of this report (option 2) would need to be considered by the councils in relation to financial, legal, organisational design and transition process implications. Consultation with tenants under S105 Housing Act 1985 would be required.

6.5.5 It is not possible to make a realistic financial assessment of the option at this point, without further work based on the council’s potential interest in developing a business case for this model. However, an assessment of the effect of moving to a shared service on the council accounts would need to be undertaken. The legal complexities of adopting a shared service model will naturally require expert advice and guidance beyond the scope of this report. A full assessment would need to consider:

- Formation
- Governance arrangements
- Procurement arrangements
- Assessment of the effect of this upon pension funds
- Staffing and TUPE arrangements
- Clienting arrangements on the council side

**6.6 Option 4: Withdraw from EKH and outsource the service to one or more external providers**

6.6.1 An effective outsourcing partnership can harness the strategic vision and knowledge of operating context of a service with the commercial skills, delivery focus and performance culture of a partner organisation to deliver economies of scale at a lower cost base, improve consistency and contentment, and to innovate.

6.6.2 A summary of the option is set out below.

<b>Strengths</b>	<b>Weaknesses</b>
<ul style="list-style-type: none"> <li>• Improve efficiency and deliver more significant economies of scale</li> <li>• Provides flexibility of approach and restructuring at a lower cost base</li> <li>• Surpluses generated can be used to deliver other priorities</li> </ul>	<ul style="list-style-type: none"> <li>• The financial model will require considerable development to prove viability</li> <li>• Benefits of initial savings may be offset as arrangement is unable to respond to changes in operating environment</li> <li>• Reliant on maintaining strong partnership and clienting relationships over an extended period of time</li> <li>• Complex option to create and is only described in outline in this report</li> <li>• Handing back control to a third party can be highly problematic (as this report outlines)</li> </ul>
<b>Opportunities</b>	<b>Threats</b>
<ul style="list-style-type: none"> <li>• Retain strategic control whilst utilising market skills to drive service forward</li> </ul>	<ul style="list-style-type: none"> <li>• High degree of stakeholder scrutiny and potential challenge to the model</li> </ul>

	<ul style="list-style-type: none"> <li>• Financial and reputational risks are the same as those associated with any commercial venture</li> <li>• Potential failure of outsourcing partners</li> <li>• Could expose councils to market risks and corporate frailties</li> </ul>
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6.6.3 Much of the considerations outlined in section 6.4 of this report (option 2) would need to be considered by the councils in relation to financial, legal, organisational design and transition process implications. Consultation with tenants under S105 Housing Act 1985 would be required.

6.6.4 Taking forward this option will require a significant level of management input prior to embarking on a formal OJEU tender exercise. A full business case is essential to establish the scope and viability, potential rewards and risks associated with the option, and would need to consider the following:

- a. Definition of the contract strategy:
  - Scope – housing management only or including repairs and maintenance
  - Specific services to be included or excluded
  - Split and number of contract lots (with an assessment of the risks associated with a single or multiple party arrangement)
  - Duration of the contract
  - Profit-sharing and risk-sharing arrangements
- b. Full service specification needed;
- c. Running the contract tendering process, including full market consultation on the contract strategy elements;
- d. TUPE arrangements and contract lead-in time; and
- e. An outline timetable for contract mobilisation.

6.6.5 Financial considerations

It is not possible to make a realistic financial assessment of the option at this point, without further work based on the council's potential interest in developing a business case for this model.

### 6.6.6 Legal considerations

The legal complexities of establishing an outsourcing partnership will naturally require expert advice and guidance beyond the scope of this report. A full legal assessment would need to consider:

- Procurement arrangements
- Contract arrangements
- Governance arrangements
- Staffing and TUPE arrangements
- Clienting arrangements

## **7. CONCLUSION AND RECOMMENDATIONS**

- 7.1 Following performance concerns in 2018/19, an Improvement Plan was put in place for an 18 month period starting April 2019. In May & June 2019 serious performance and health and safety compliance failings by EKH were uncovered. In view of the ultimate responsibility for tenants and leaseholder properties remaining with the council, it is appropriate to consider future housing management options, reflecting on those that will most effectively deliver an improvement in the council's housing management services.
- 7.2 In deciding the best way forward for providing improved housing management services in the four councils, the operational challenges and local housing needs should be considered against each delivery model option in order to guide the selection of the chosen approach.
- 7.3 Based on the recent failings of EKH, Option 1 would require significant investment to be undertaken by the four councils to address poor levels of performance and non-compliance and to restore confidence in the management service. Analysis of Options 2 and 3 confirms that both are relatively strong potential paths for the four councils to select, but each has its own individual strengths and weaknesses, opportunities and risks associated with it. Option 4 introduces the potential for a much wider restructuring and refocusing of the service, with the realisation of some benefits, but with much greater levels of risk.
- 7.4 Option 2 (the in-house option) offers the best opportunity to take direct control to make improvements and provides each council with the strongest levels of control, removing many vulnerabilities relating to non-performance issues of a third party management arrangement. This option puts the housing management service in a better position in relation to each council's wider corporate plan priorities to secure improved outcomes for residents. It will be necessary to look at how this option will address elected member and resident engagement and there are various options that could be pursued. For example, an elected members and residents committee may overcome / replace the loss of the ALMO Board under the in-house option. However, if the council does agree in principle to progress the in-house option, it is recommended that further exploration should also be given to future shared service opportunities.

- 7.5 The in-house option offers the opportunity to re-position the housing service within the each council with the aim of improving a broad range of outcomes for over 3,000 households. This is not necessarily the lift and shift of a self-contained housing service into each council's structure. This option provides the opportunity to engage the housing service with the council's wider corporate agenda in order to secure improved outcomes for residents. There are two areas of particular further work needed within this high level options appraisal if the in-house option is supported: these are (1) completing a detailed financial analysis of management costs as part of a renewed financial model to provide a greater degree of confidence regarding the HRA Business Plan and the longer-term HRA forecast; and (2) the identification and mitigation of the key risks arising from the new position of the housing management service within the council's wider business. Creating an in-house service is an opportunity to redesign the corporate approach and figure out afresh the opportunities that arise from having the housing management unit under direct council control.
- 7.6 In conclusion, taking into account the recent challenges and high level analysis, it is recommended that the in-house option is agreed as the preferred option. This is proposed as the option which will best serve residents in the four local authority areas. However, it is recommended that EKH tenants and leaseholder views are sought on this proposal before a final decision is made.
- 7.7 Section 105 of the Housing Act (for secure tenants) and Section 137 of the Housing Act 1996 states that there is a legal duty to consult over a specified time period. Tenants must make their views known with representations being taken into consideration.
- 7.8 Therefore, it is proposed that an 8-week consultation will run across the four local authority areas between Tuesday 22 October to Friday 20 December 2019, seeking the views of tenants and leaseholders (and other stakeholders), which will be presented to Overview and Scrutiny Committee and Cabinet in early 2020. The four East Kent council chief executives will review the progress of the consultation and consider extending the consultation timescales if this is necessary to ensure effective resident engagement.
- 7.9 If, in light of the consultation, the four councils proceed with option 2, there will need to be a process to transfer the service to each individual council. A significant level of staff resource has already been deployed in 2019/20 to respond to the matters reported. In moving the work forwards the potential transition back to the council continues to require careful planning and management. It is therefore recommended that the council makes available up to £250,000 from the HRA in 2019/20 and 2020/21 (split to be determined) to support interim transition management costs for Folkestone & Hythe, subject to option 2 being supported.

## **8. RISK MANAGEMENT ISSUES**



Perceived risk	Seriousness	Likelihood	Preventative action
Ensuring that service quality and delivery is not impacted throughout the consultation period.	High	Low	Regular monitoring of performance against the delivery objectives and targets will continue throughout the consultation period.
That tenant engagement and satisfaction drops.	High	Low	It is paramount to ensure that this is a thorough and detailed consultation exercise that allows everyone to have their say.

## 9. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

- 9.1 **Legal (NE)** – Section 105 of the Housing Act (for secure tenants) and Section 137 of Housing Act 1996 states that there is a legal duty to consult over a specified time period. Tenants must make their views known and we will consider any representations made. Any consultation on a different delivery model should therefore involve tenants and leaseholders.
- 9.2 **Finance (CP)** - There will be costs involved in the consultation exercise and transition arrangements. There are significant financial implications relating to the future delivery model, but Cabinet are not being asked to agree the implementation of the new model at this stage.
- 9.3 **Human Resources (AS)** - At this stage there are no direct staffing implications, but should the ALMO ultimately return to the council, then TUPE regulations would apply, and staff would be formally consulted in accordance with the council's policies and procedures. EKH staff will be notified of the consultation process prior to the publication of the decision.
- 9.4 **Property (SR)** - Should the ALMO return to the council, then staffing reviews will follow, as will an assessment of the future accommodation requirements. These have not been quantified at this stage.
- 9.5 **Equality (SR)** – An Equality Impact Assessment (EIA) for the future options has not been required at this stage, as no changes to service delivery or staffing are envisaged at this point. However, an EIA has been prepared for the stakeholder consultation.
- 9.6 **Communications (AW)** – This report outlines that good communication, informing and involving tenants and leaseholders on future options will be required. The communications team will lead on the promotion of the consultation survey through a variety of channels.

## 10. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

Councillors with any questions arising out of this report should contact the following officers prior to the meeting:

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The following background documents have been relied upon in the preparation of this report:

East Kent Housing: Agreement for housing management and other services (1 April 2011)  
Social Housing Regulator's Tenant Involvement and Empowerment Standard

**Appendices**

Appendix 1: Housing management delegated functions  
Appendix 2: East Kent Housing organisation structure (August 2019)  
Appendix 3: East Kent Housing financial arrangements  
Appendix 4: Draft tenant and leaseholder consultation documents