

# Strategic Housing Services

**Waveney District Council**

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## Local Authority Housing Inspections

The Audit Commission is an independent body responsible for ensuring that public money is spent economically, efficiently and effectively and delivers high quality local and national services for the public.

Within the Audit Commission, the Housing Inspectorate inspects and monitors the performance of a number of bodies and services. These include local authority housing departments, local authorities administering Supporting People programmes, arms length management organisations and housing associations. Our key lines of enquiry (KLOEs) set out the main issues which we consider when forming our judgements on the quality of services. The KLOEs can be found on the Audit Commission's website at [www.audit-commission.gov.uk/housing](http://www.audit-commission.gov.uk/housing).

This inspection has been carried out by the Housing Inspectorate using powers under section 10 of the Local Government Act 1999 and is in line with the Audit Commission's strategic regulation principles. In broad terms these principles look to minimise the burden of regulation while maximising its impact. To meet these principles this inspection:

- is proportionate to risk and the performance of the Council;
- judges the quality of the service for service users and the value for money of the service;
- promotes further improvements in the service; and
- has cost no more than is necessary to safeguard the public interest.

## Summary

- 1 Waveney District Council is a rural coastal district council in the east of England. The population is 114,300 of which 2.7 per cent are from black and minority ethnic communities.
- 2 The Council is Conservative led with 25 of the 48 seats. Currently an executive and leader model governs the business of the Council.
- 3 The Council employs approximately 1,000 staff across all services and has a General Fund budget of £13.4 million for 2005/06 with reserves of £1 million at March 2005.
- 4 The inspection covered access and customer care, diversity, value for money, housing strategy and enabling, homelessness and housing needs and private sector housing.

## Scoring the service

- 5 We have assessed Waveney District Council as providing a ‘poor’, no-star service that has uncertain prospects for improvement. Our judgements are based on the evidence obtained during the inspection and are outlined below.

**Table 1 Scoring chart<sup>1</sup>**

		Prospects for improvement?					
Excellent						‘a poor service that has uncertain prospects for improvement’	
Promising							
Uncertain	☀						A good service?
Poor							
		Poor	Fair ★	Good ★★	Excellent ★★★		

Source: Audit Commission

- 6 The strategic housing service provided by Waveney District Council is poor due to the following reasons.
- There is limited focus on the delivery of services for the benefit of customers. Services are not easily accessible because of their location and restricted opening hours, service standards have not been consistently published, information leaflets are not clear or comprehensive and the Council’s offices do not comply with the requirements of the Disability Discrimination Act 1995.
  - Customers are not engaged in improving and shaping all services. The Council is not actively seeking feedback from customers as customer satisfaction surveys are not being routinely undertaken.
  - The approach taken towards diversity is not embedded within the service. Not all key staff have been trained and there are weaknesses in the provision of information in other formats for example large print, audio tape or Braille.

<sup>1</sup> The scoring chart displays performance in two dimensions. The horizontal axis shows how good the service or function is now, on a scale ranging from no stars for a service that is poor (at the left-hand end) to three stars for an excellent service (right-hand end). The vertical axis shows the improvement prospects of the service, also on a four-point scale.

- The Council's understanding and knowledge of the housing needs of the community is underdeveloped.
  - The council has a limited understanding of the profile of its customers and the needs of diverse groups in the community.
  - The Council has made limited progress in the delivery of affordable housing.
  - The Council is not making satisfactory progress towards addressing poor housing conditions in the private sector. There is limited information about vulnerable households in private sector housing.
  - Requests for enforcement action by emergency authorities are not being routinely acted upon and monitored and the Council is not actively inspecting high risk houses in multiple occupation.
  - Some residents are waiting a long time for disabled facilities grants.
  - The service cannot robustly demonstrate that its services offer value for money. Comparative information is not routinely collected, analysed and reported.
- 7 The following areas are identified as strengths.
- The Council has facilitated the conversion of difficult to let properties to provide supported accommodation for young single mothers and homeless families and therefore reduced the use of and reliance on bed and breakfast.
  - There is a reasonable understanding of private sector housing conditions following the completion of a stock condition survey in 2002.
  - Homelessness and housing advice has a focus on prevention and this is leading to a reduction in the numbers of applications, and homeless applicants are spending less time in bed and breakfast accommodation therefore enabling savings to be achieved.
  - There is a good range of temporary housing being used including some adapted properties for use by disabled customers.
  - Disabled facilities grants are prioritised in accordance with need.
- 8 The Council has uncertain prospects for improvement because the following barriers to improvement were identified.
- The Council has been slow to address key weaknesses identified in the Comprehensive Performance Assessment (CPA) Decent Homes Standard (DHS) diagnostic.
  - Services are not consistently improving. The track record of improvement across the strategic housing service is inconsistent as the private sector service has deteriorated in the last two years.
  - Services are being delivered with little input from customers.
  - Satisfaction surveys and consultation are not engaging service users to ensure their influence into service delivery.
  - The approach towards value for money is not embedded.

## 8 Strategic Housing Services | Summary

- Strategic direction priorities are still to be translated into SMART<sup>2</sup> outcomes within service plans and strategic priorities for the service have not been clearly defined.
  - The housing strategy action plan is not SMART and there are no robust procedures in place to ensure that its actions are regularly reviewed.
  - The performance management framework is not effectively targeting poor performance consistently.
  - The service planning framework is not engaging with staff and therefore some staff are unaware of the contents of the plans.
  - Appraisals at an individual officer level are still to be completed.
  - The structure is fragmented and this is resulting in inconsistencies in approach.
  - Investment in new IT is not being maximised due to restrictions in usage and interfacing problems.
  - There are insufficient funds allocated for training provision.
  - There are significant capacity shortfalls which are impacting on the ability to deliver an effective service.
- 9 The following drivers for improvement were identified, however:
- new IT systems have delivered improvements in performance management information;
  - a dedicated senior manager and consultant have been appointed to improve communications;
  - the Council agreed in August 2005 to move towards an 'enabling' model for service provision. This provides some clarity of strategic direction for the Council;
  - the Council been successful at enabling inward investment; and
  - the Council is developing effective partnerships to improve the homelessness service.

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<sup>2</sup> Specific, measurable, achievable, realistic and timebound

## Recommendations

- 10 To rise to the challenge of continuous improvement, organisations need inspection reports that offer practical pointers for improvement. Our recommendations identify the expected benefits for both local people and the organisation. In addition, we identify the approximate costs<sup>3</sup> and indicate the priority we place on each recommendation and key dates for delivering these where they are considered appropriate. In this context, the inspection team recommends that the Council shares the findings of this report with tenants and councillors and addresses all weaknesses identified in the report. The inspection team makes the following recommendations.

### **Recommendation**

*R1 Strengthen the focus on customers by:*

- *introducing, publishing and monitoring service standards in conjunction with customers;*
- *establishing systems to gather regular feedback from customers and using this information to inform service development; and*
- *building up information on the customer profile to increase the understanding of the diverse needs of the community.*

The expected benefits from this recommendation are:

- delivery of services in accordance with customer needs;
- increased engagement by tenants and increased customer satisfaction;
- identification of tenants with special needs;
- greater transparency in the provision of services;
- identify poor performing areas; and
- capturing learning from feedback from customers and the application of learning to enable service improvements to be identified.

The implementation of this recommendation would have high impact and incur low costs. This should be implemented by January 2007.

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<sup>3</sup> Low cost is defined as less than 1 per cent of the annual service cost, medium cost is between 1 and 5 per cent and high costs is over 5 per cent.

**Recommendation**

*R2 Strengthen the focus on diversity by:*

- *developing training to ensure increasing awareness of diversity matters and also ensuring that training is focussed on service delivery;*
- *evaluating the provision of training to ensure that it is achieving its desired outcomes;*
- *undertaking diversity and equality impact assessments in the establishment of all plans and strategies;*
- *reviewing the approach towards how the Council responds to racial harassment complaints;*
- *including strap lines on all leaflets to indicate their availability in other formats; and*
- *displaying posters indicating the provision of interpreting and translation services at all access points.*

The expected benefits of this recommendation are:

- compliance with legislation and positive practice;
- increased accessibility to services provided by the Council; and
- increased awareness and understanding for staff and councillors.

The implementation of this recommendation would have high impact and incur low costs. This should be implemented by January 2007.

**Recommendation**

*R3 Improve the approach towards value for money by:*

- *ensuring that information about the delivery of costs is collected and analysed; and*
- *comparing costs with other service providers and ensuring that this information is routinely reported.*

The expected benefits of this recommendation are:

- ensuring the more effective and efficient use of resources.

The implementation of this recommendation would have a high impact and incur low costs. This recommendation should be implemented by January 2007.

**Recommendation**

*R4 Strengthen the approach towards performance management by:*

- *ensuring that progress against all action plans is routinely reported through the performance management framework;*
- *undertaking a regular review of performance at an individual level for all staff; and*
- *ensuring that training needs against the service objectives are established on a regular basis and training is delivered.*

The expected benefits of this recommendation are:

- enabling weaknesses within the service to be more readily identified and addressed;
- engaging all staff in the delivery of the service; and
- delivering a more effective service.

The implementation of this recommendation would have a high impact and incur low costs. This recommendation should be implemented by January 2007.

**Recommendation**

*R5 Address capacity throughout the service by:*

- *evaluating the structures and resources required to deliver the strategic housing service effectively.*

The expected benefits of this recommendation are:

- identifying and addressing shortfalls in capacity within the teams;
- ensuring greater accountability; and
- delivering a more holistic service.

The implementation of this recommendation would have a high impact and incur low costs. This recommendation should be implemented by January 2007.

**Recommendations**

*R6 Establish robust procedures to ensure that all requests by emergency services for property inspections are undertaken without delay.*

*R7 Develop a specific, measurable, achievable, resourced and time-bound (SMART) action plan to address all weaknesses identified in this report and ensure that progress is regularly monitored and reported.*

*R8 Develop a regular reporting framework to enable the reporting of findings and recommendations in this report to the Council, staff and service users.*

*R9 Develop actions to ensure that work is undertaken to enable all offices and access points comply with the Disability Discrimination Act 1995.*

- 11 Dates of inspection: 28 November 2005 - 2 December 2005.

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# Report

## Context

### The locality

- 12 Waveney is a coastal rural area of 370 km<sup>4</sup> situated in north east Suffolk. The main centre of population is Lowestoft, with four other towns at Beccles, Bungay, Halesworth and Southwold.
- 13 The population is 114,300 and this represents an increase of 4.2 per cent since 1991. It is projected that this will increase by 2.2 per cent by 2021. Approximately half the population lives in Lowestoft and 31 of the 58 parishes have a population of less than 300.
- 14 The population is predominantly white British (97.3 per cent) and the largest minority population is other European Union nationals who represent around one per cent of the population. Over 224 per cent of the population are disabled and in addition 22.0 per cent of the population is over 65 which is significantly higher than the national and regional average at 16 and 16.8 per cent respectively.
- 15 Waveney is ranked 113 of 354 authorities in the Office of the Deputy Prime Minister's 2004 Indices of Deprivation. Sixteen per cent of the population live in the 10 per cent most deprived wards in the country and three wards feature in the top ten per cent nationally. Unemployment stands at 3.5 per cent compared with the national average of 2.0 per cent and the regional average of 1.8 per cent. Average weekly earnings are £289<sup>5</sup> compared to £374 regionally and £357 nationally.

### The Council

- 16 The Council comprises 48 councillors who represent 23 wards. There are 25 Conservative, 13 Labour, 7 Independents and 3 Liberal Democrats: the Conservatives have overall control of the Council, and the business of the Council is governed by an Executive and Leader model of governance.
- 17 General Fund budget net expenditure in 2004/05 was £13.4 million, and HRA expenditure £25 million. Capital expenditure includes £1 million for improvements grants to private sector housing and £200,000 for support to housing associations.
- 18 The senior management structure consists of a Chief Executive and three Executive Directors, who are responsible for Regeneration and Environment, Community and Operations and Corporate Governance. The structure is supported by ten Portfolio Managers and there are approximately 1,000 employees at the Council.

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<sup>4</sup> 2000 Housing Needs Survey

<sup>5</sup> Annual Survey of Hours and Earnings

- 19 The Council was assessed as 'weak' in its CPA inspection October 2004.
- 20 The Council is pursuing Large Scale Voluntary Transfer (LSVT) of its housing stock. It is anticipated that a ballot of tenants will take place in spring 2006.

### **The Service**

- 21 The strategic housing function is provided through two portfolios, Community and Operations and Regeneration and Environment, headed by two separate Portfolio Managers. The Community and Operations Portfolio includes a Social Inclusion and Housing Strategy team which is responsible for homelessness and housing advice, temporary accommodation and the strategy and enabling function. The Regeneration and Environment Portfolio is responsible for the delivery of to private sector housing functions.
- 22 There are 53,062 households in the district of which 4,902 are owned by the Council representing 4.2 per cent of the total stock. There are 86.6 per cent in the private sector, and the remaining 4.2 per cent rented through housing associations.
- 23 House prices have risen much quicker than the national average in the past few years due to low historical housing price inflation. The average price of a house is £144,756 (compared to £199,210 regionally) and has risen by 31 per cent since 2003, compared to 29 per cent nationally and 20 per cent regionally.
- 24 A private sector stock condition survey of approximately ten per cent was undertaken in 2002. This confirmed that 15.4 per cent of the stock failed the decent homes standard, and 8.2 per cent is unfit. In particular 17.6 per cent of pre-1919 housing is defined as unfit and 5.1 per cent of all properties lack modern facilities; 20.8 per cent lack reasonable thermal comfort. The estimated total cost of bringing all private sector stock to reasonable standard is £50 million. The survey also confirmed that 16 per cent (200) of the district's Houses in Multiple Occupation (HMOs) were unfit for habitation and that a total of £1 million needs to be spent on repairs to unfit HMOs, excluding any fire precaution works.
- 25 The Council undertook a housing needs survey in 2002. The survey confirmed a need for 635 affordable homes for the period 2000–2005. The survey also identified that 3 per cent of households had incomes below £10,000 (which is only one per cent less than for UK as a whole) and that 68 per cent of households had incomes below the national average household income of £20,000 and 19 per cent of all households were in receipt of Housing Benefit.
- 26 Planned General Fund capital expenditure for 2005/06 is £1.0 million for private sector grants including disabled facilities grants.
- 27 The inspection covered access and customer care, diversity, value for money, housing strategy and enabling, homelessness and housing needs and private sector housing. These are the key services to be retained by the Council should proposals to transfer the stock proceed successfully.

## How good is the service?

### What has the service aimed to achieve?

- 28 The Council has a strategic direction that was agreed in February 2005 that establishes a mission, objectives and priorities for the Council. The Council has a clear mission for Waveney, which is 'a safe, clean, attractive and prosperous environment for our communities'. The mission is supported by four key objectives. These are:
- an environment that meets the basic needs of our communities;
  - an environment of quality and culture with a strong economy;
  - an environment that is sustainable and clean; and
  - an environment that engages with the community.
- 29 These four objectives are supported by 17 priorities. Housing is identified as a clear priority and this is to 'meet the housing requirements of the whole community'. This priority is consistent with the Local Strategic Partnership (LSP) which has key ambitions to 'meet Waveney's accommodation needs'.
- 30 The Housing Strategy 2004 has been assessed as 'fit for purpose' by the Government Office for the East of England. The strategy details four key priorities that seek to address and contribute towards corporate, national, regional and sub-regional priorities. These are:
- securing new affordable homes for people in greatest need;
  - managing and maintaining council homes to high standards;
  - improving conditions in the private sector; and
  - ensuring that households have access to good quality housing and housing related services.

### Is the service meeting the needs of the local community and users?

#### Access and customer care

- 31 This is an area of weakness for the Council. Although meeting the needs of customers is a clear priority customers cannot access services easily because of office locations, opening hours and facilities. There are no published service standards and there are a limited number of information leaflets. The web site is not very informative, the complaints procures is of limited effectiveness and there are no established procedures to seek customer feedback. This limits the effectiveness and impact of the service.

- 32 There are a limited number of access points to housing services, despite the rural make up of the district. Housing services are delivered primarily from two sites in Lowestoft and although the Council has established local offices at the four main towns the provision of services at these offices is limited to directing customers to the most appropriate office. Homelessness and housing advice services are accessed through the office at Clapham Road in Lowestoft and private sector services are accessed through the office at Mariners Street, also in Lowestoft. Existing and potential users of the service therefore find the service difficult to access due to the location of the offices within the district.
- 33 Office opening times are limited and are restricting access to the services. The housing advice service is provided on a surgery basis on Monday, Wednesday and Friday mornings and other remaining housing services are accessible 8.30 to 5.00pm Monday to Thursday, and until 4.30pm on Fridays. In addition office hours and telephone numbers are not clearly indicated at all offices. This restricts access for residents who are working during office hours, or those who live in outlying rural areas.
- 34 The out-of-hours homelessness service is not well publicised and response rates to requests for assistance are inappropriate. The number to call outside normal office hours is not readily evident in any leaflets and out-of-hours and emergency contact numbers are not clearly visible at all office locations. When we tested the service, the response to our initial request for assistance took four hours, which is unacceptable. Although procedures have been established for when the duty officer cannot be contacted, staff are not aware of it due to the absence of a prompt response. Therefore the Council is providing an ineffective service for dealing with homelessness outside of normal office hours.
- 35 Offices overall are not welcoming and not easily accessible by people with disabilities. Offices are not of a high quality and lack corporate branding and are in need of upgrading to ensure compliance with the Disability Discrimination Act (DDA) 1995. Although some offices had disabled toilet facilities and private interview rooms, access is difficult for people with disabilities due to restricted parking, the absence of automatic doors at offices, high level counters and no facilities for those with visual or audio impairments. This restricts and deters access to some customers.
- 36 There are no published corporate service standards in place. Although there are corporate service standards and systems in place for telephone answering, letters and emails, customers are not made aware of these as these have not been publicised. Also due to limitations of the telephone system the Council is only able to monitor response times for calls made to the switchboard and not those numbers dialled directly. This prevents the Council from accurately monitoring the quality of service being provided via the telephone.
- 37 Service standards do not cover all services being provided. For example, there are no service standards for applicants for disabled facilities grants (DFGs) or for homelessness and housing advice. As a result of this the Council is unaware of its actual performance and is not using the development of service standards towards identifying the quality of its services. In addition, customers will be unclear of what to expect when they seek to access services.

- 38 The Council does not have a comprehensive approach towards customer care. Training on customer care matters has not been provided for all front line staff. The Council cannot therefore ensure that all staff provide a consistent customer focused approach in the delivery of its services.
- 39 The range of leaflets available for customers is limited, they are neither clear nor informative and not available at all access points. Although the Council has recently established corporate standards for the publication of leaflets some are not available in different formats or include language strap lines. Therefore customers and potential customers will not find available leaflets to help in seeking advice and information about services, and there will be a reliance on word of mouth to publicise services.
- 40 The web site is of limited use. For example:
- the website is difficult to navigate and users cannot find information quickly. A search for the housing strategy, homelessness strategy and supporting people strategy did not return with the correct documents;
  - there is limited information for homelessness applicants about eligibility;
  - there are few opportunities to complete transactions on line. Although users can download forms there is no opportunity to complete these on line; and
  - the web site does not promote contact details such as telephone numbers or email addresses for officers. In addition the web site does not include key hyperlinks to enable customers to find other sites easily, for example for those seeking debt advice.
- 41 The Council is not proactively seeking feedback on the quality of services being provided. Customers are not asked for their opinions of the service, there are no satisfaction surveys being undertaken and there is no data available which confirms satisfaction levels for any aspect of the service under inspection. Therefore there is no evidence that services have been developed with customers/users or that the council is trying to engage service users in service development.
- 42 The complaints procedure is of limited effectiveness. The procedure is publicised on the web site, is easy to understand and is supported by a freephone telephone number. In addition, comments, compliments and complaints can be submitted on line and service standards for responses are clearly indicated on the website. However some reception staff are not fully aware of the procedures and the corresponding freephone number, service standards were not prepared in conjunction with customers and leaflets are not available in other formats such as large print, tape or Braille. These shortfalls limit the overall effectiveness of the complaints procedures.
- 43 The Council is not undertaking a systematic analysis of comments, compliments and complaints. Although complaints are collated and reported to the Council's Scrutiny Committee, comments and compliments are not subject to this reporting framework and the Council is missing opportunities to gain comprehensive feedback to the service and improve or review the service.

## 18 Strategic Housing Services | How good is the service?

- 44 Services are not being actively promoted to potential users. The Council has a reasonable understanding of service usage in some areas through the collation of monitoring information. However, it is not proactively assessing customers who are not yet accessing services. Senior officers and elected members do not monitor the take up of services consistently and in accordance with the population profile. Information is not collated on customers which would identify how services are being used and whether there are any issues in terms of barriers for specific groups. Waveney is, therefore, unable to identify barriers which may be hindering access to services by the community.
- 45 The Council provides good quality information to homeless applicants placed in temporary accommodation. A handbook is provided to all tenants accepting temporary accommodation. The handbook is clear, well written and comprehensive and details the standards that applicants can expect. However, the booklet does not indicate its availability in other formats such as larger print or other languages.

### **Diversity**

- 46 Overall this is an area of weakness for the Council. There is no effective leadership being demonstrated to promote diversity, the Council lacks a clear and comprehensive strategy towards addressing diversity and equality and the approach towards is neither fully developed nor embedded.
- 47 Addressing diversity at a strategic level is under developed and has not been prioritised for improvement. Although the Council has a diversity policy and race equality strategy in place, the Council has not worked with the Local Strategic Partnership (LSP) to establish a community cohesion strategy or undertaken equality impact assessments of its service plans, policies and strategies. This is impacting on the Council's ability to progress diversity and equality policies and procedures corporately as equality and diversity matters are not being consistently and effectively considered.
- 48 The Council has not built upon existing plans and strategies on diversity. It remains at Level one of the Equality Standard for local government which was achieved in 2003/04. The Council has not established a challenging target to progress from Level one and is only seeking to achieve level two of the Standard during 2007/08. Therefore the Council is not demonstrating leadership at promoting and prioritising diversity.
- 49 Training on diversity has only benefited a small percentage of staff. The Council has established mandatory diversity awareness as core training for all employees and councillors in November 2004. To date, 150 staff and councillors (approximately 15 per cent) have benefited from the training and there is a rolling programme to ensure that all staff benefit from this in subsequent years. Staff attending have reported an increased understanding of legislation and greater awareness of diversity matters. However, diversity training provision has been limited due to shortfalls in budget allocations and therefore many officers and councillors have not as yet attended training and will have varying levels of skills and awareness.

- 50 The Council has been slow to respond to meet the standards identified in the Disability Discrimination Act 1995. Some premises are not compliant with the legislation despite the Act's standards being available since 1995. Although an audit was undertaken during 2002/03, improvements have still to be carried out to offices and sheltered housing schemes. The Council has implemented an action plan to ensure compliance of all access points during 2006. In the interim the approach is disadvantaging disabled people from readily accessing services provided by the Council.
- 51 Accessibility of services to customers whose first language is not English is weak. Although the Council subscribes to translation and interpreting services through LanguageLine, staff have not been trained in their use. Additionally posters promoting and indicating the availability of the service have not been consistently displayed at all offices. Consequently staff and customers are not fully aware of the availability of the service being provided by the Council.
- 52 The promotion of services in other formats is underdeveloped. The Council does not make use of strap lines on leaflets or on its website to promote their availability in different formats such as Braille, large print, other languages or audio tape. The approach therefore results in low awareness of services and expectations by service users.
- 53 The approach towards diversity within the housing strategy is weak. The strategy is based on an analysis of housing needs undertaken in 2000 and is out-of-date, although this information was subsequently updated in 2004. However, this update was carried out through a desk top exercise and so the information is not robust. The strategy includes the population profile including details of age, gender and deprivation. However the Council has not undertaken a thorough assessment of need by Black and Minority Ethnic (BME) communities, migrant workers, travellers and gypsies, older people and rural communities.
- 54 Diversity monitoring is not being consistently undertaken. The Council is not compliant with the CRE Code of Practice in Rented Housing despite its introduction many years ago. In addition although diversity and ethnicity recording is undertaken with homelessness and housing advice, diversity is not monitored consistently across other service areas such as private sector housing. In the absence of effective monitoring systems the Council is unable to ensure if there is accessibility in accordance with the population profile and that services are being provided equitably.
- 55 Procedures to monitor and address racial harassment are underdeveloped and not embedded. The Council, along with other district councils in Suffolk, have established common reporting procedures for tackling racial harassment with Suffolk County Council. However Waveney has not promoted the initiatives and support mechanisms being provided through the County Council and has not included any information on its web site other than the reporting form. In addition Waveney has consistently reported no incidents of racial harassment in the district in the last two years. This is despite recognising racial harassment as an issue in its Housing Strategy and the Crime and Disorder Reduction Strategy. The actual number of complaints recorded for racial harassment at Waveney by the County Council for 2004/05 was the second highest in Suffolk at 80 incidents.

The Council is therefore not fully aware of the number of incidents in the district and of the impact on the community.

- 56 Procedures for addressing domestic violence and supporting victims have not been established. Although the Council is currently leading on the development of the strategy at a county wide level to establish a domestic violence strategy it currently lacks established procedures to address domestic violence. Therefore there remains a risk of inconsistent actions or advice being given to victims to address this in the interim.
- 57 Contractors are not being monitored to ensure compliance with the Council's policies on equality and diversity. The Council has not established requirements for contractors to submit policies which outline their commitment to and understanding of diversity and it is, therefore, unaware if contractors are providing services equitably and sensitively.

### **Housing strategy and enabling**

- 58 Overall this is an area of weakness for Waveney. The Council has a 'fit for purpose' housing strategy that establishes the framework for its enabling role. However the housing strategy has not been formed by a robust, up to date and thorough understanding of housing needs or the housing market in the district. The housing strategy has not been shaped through effective consultation and is not supported by a regular review mechanism to enable the delivery of key improvements. This limits its effectiveness as an over arching document setting in place a framework to deliver the wider community priorities.
- 59 Waveney has established clear priorities for the strategic housing service, and the housing strategy sets out the four key priorities for the Council, which are to secure homes for people with the greatest need; to manage and maintain its own homes to high standards; to improve conditions in the private sector and to ensure that households have access to good quality housing and housing-related services. The strategy includes an action plan that seeks to address these priorities and enables the Council and stakeholders to establish progress against these.
- 60 The housing strategy is aligned with other internal and external strategies, as well as national, regional and sub regional priorities and can demonstrate linkages with the homelessness strategy, housing revenue account business plan and the sub-regional housing strategy prepared in conjunction with Great Yarmouth Borough Council (GYBC). Although the housing strategy has not been updated since its publication in January 2005 a number of its key actions are included within the Council's high level improvement plan which was established only recently. This ensures that actions in the strategy are consistent with those of the Council.
- 61 The Council's research base and understanding of the housing market at a district and sub-regional level is underdeveloped. Waveney has access to many sources of information, for example, unemployment data, completions of new build properties and house price data. However, these are not being effectively channelled and utilised across service areas.

The Council has not systematically updated housing needs information through the use of homelessness, housing advice and housing register trends or house prices and rent levels information. The situation was compounded due to the absence of a dedicated research post-holder at the time of the inspection. However, to increase its awareness of the housing market, the Council is actively working with Great Yarmouth BC and Suffolk CC towards producing a housing market assessment and seeking to appoint to the research post which should increase the Council's awareness of the housing market.

- 62** Waveney has a good understanding of stock condition The Council undertook a survey of its stock based on a 15 per cent sample of the housing stock in 2004. The stock condition survey completed by external consultants confirmed that 38 per cent of the stock fails to meet the Decent Homes Standard (DHS). The cost of achieving the DHS for existing and potential non decent dwellings has been estimated at just under £16 million and the Council has implemented plans to ensure that it reaches its decent homes target by 2007.
- 63** Following a survey of private sector housing conditions, which was commissioned in 2002, the council has a reasonable awareness of housing conditions in the private sector. The survey gave the following information:
- rate of unfitness within the district at 8.2 per cent;
  - 4 per cent of homes in substantial disrepair;
  - 17.4 per cent of pre-1919 dwellings as unfit for habitation; and
  - 16 per cent (200) of the Houses in Multiple Occupation (HMOs) were unfit for habitation.
- 64** The survey also confirmed that 30 per cent of unfit housing was occupied by households aged over 60 and on low incomes and 13.5 per cent of all households contained at least one disabled person, and the total cost of bringing the private sector dwellings up to a reasonable standard was estimated at £50 million. This information has increased the understanding of housing stock conditions in the district.
- 65** The Council's housing strategy is not based on a robust assessment of housing needs information. The strategy uses housing needs information collected following a comprehensive survey undertaken in 2000. This identified a need for 635 affordable homes for 2000–2005. Although this was supplemented with a desk top update in 2004 this latter exercise did not include a survey of residents and therefore some aspects of information are out-of-date and not based on a thorough analysis of need.
- 66** Waveney is not effectively promoting services and meeting the needs of vulnerable groups in the district. The Council is working through the Supporting People Commissioning Body and Suffolk County Council's social services teams to examine service provision for vulnerable adults.

However, it does not have robust procedures to provide support to vulnerable applicants and has not undertaken research towards identifying rural housing needs, housing needs of BME communities, travellers, young people and the scope of empty properties in the district. In the absence of such research the Council will not be able to draw effective strategies to address their housing needs.

- 67 The housing strategy has not been based on effective consultation with stakeholders. Although the Council held a consultation event in preparing the previous strategy the consultation methods used were limited to seeking comments from stakeholders on the draft document. As a result of this there was a low response rate due to the reduced opportunities for engagement, and therefore the views of key internal and external stakeholders have been missed and many stakeholders remain unaware of what actions the strategy is seeking to achieve.
- 68 The Council has not effectively prioritised resources within the housing strategy and is reducing funding for private and social housing improvements. Although funding is confirmed up to 2006/07 at £1.05 million this represents a reduction from £1.464 million spent in 2002/03 with no money identified for spending on social housing. The strategy is not consistently prioritising resources on primary objectives and is unlikely to meet its proposals.
- 69 The housing strategy action plan is weak and not SMART. The action plan does not establish priorities clearly against identified needs, it lacks clear milestones for many longer term actions and many actions are vague and do not contain clear targets. The plan does not seek to address shortfalls in its approach towards addressing the needs of vulnerable groups and in addition many actions are inward facing and lack clearly articulated outcomes. As a result of this the action plan is ineffective at identifying robust actions to address needs.
- 70 Progress against the housing strategy action plan has been limited. The Council has not completed an effective assessment and update of progress against the actions and therefore it cannot clearly indicate its progress against the plan. Although a number of actions have been achieved many have not been addressed effectively. For example the Council cannot evidence:
- a reduction in the numbers of empty homes which was targeted at ten per year;
  - production of an empty homes strategy which was targeted for April 2005;
  - reductions in the numbers of unfit homes against a target of 20 per year; and
  - any progress towards increasing the proportion of decent homes in the private sector as a local target.
- 71 Waveney has not established a robust review process for the housing strategy action plan involving stakeholders. The action plan has been subjected to corporate risk assessment and regular review against the identified risks.

However it has not established a robust mechanism to progress the actions arising from its housing strategy. It has, therefore, not effectively reviewed its performance against actions, and key stakeholders are unaware of the progress made against the plan.

- 72** In addition, the Council has not used stock information effectively to develop strategies to tackle private sector housing conditions, and nor has it established robust programmes to address stock condition. Monitoring systems to establish progress against the DHS in other sectors have not been introduced and there are no effective systems established to monitor the numbers of vulnerable people living in non-decent homes in accordance with Public Service Agreement (PSA) 7<sup>6</sup>. In the absence of established monitoring mechanisms and targets the Council is unlikely to be able to assess progress against key government targets and its own housing priorities.
- 73** The Council worked effectively with partners to address difficult to let properties and sustainability issues with its housing stock. In conjunction with local housing associations Waveney has converted and fully refurbished a block of 24 flats to provide supported accommodation and life skills training for young single mothers. This opened in February 2003. In addition the Council also converted and refurbished a difficult to let sheltered housing scheme in March 2003 to provide temporary, supported accommodation for 24 homeless families. These initiatives have helped to reduce reliance on the use of bed and breakfast and also demonstrate an understanding of the need to address unpopular or hard to let housing stock.
- 74** Positive use has been made of planning guidance and policies to contribute towards increasing affordable housing provision. An interim local plan was adopted in May 2004 which provides the policy context for the delivery of affordable housing through the planning system, while seeking to address the structure plan targets. The plan establishes a challenging target of 30 per cent affordable housing on all sites of three or more dwellings and is based on Government guidance, the Council's 2002 urban capacity study and local housing need. The approach therefore seeks to ensure greater output of affordable housing and sustaining communities in the district.
- 75** High quality guidance has been prepared for developers. The Council's approach towards affordable housing provision is supported by the preparation of development briefs, a published design brief and affordable houses guidance for developers (June 2005). These documents are clearly written and well presented. They ensure increasing awareness of the importance and need for affordable housing with the type and size to reflect the local circumstances and sustainability.

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<sup>6</sup> PSA 7 by 2010 for vulnerable households in the private sector, including families with children, seeks to increase the proportion who live in homes that are in decent condition.

- 76 The Council has not been effective in the delivery of affordable housing in the district. The housing strategy established a target of 46 additional affordable units each year; however, over the past three financial years the actual completion amounted to an average of 36 affordable units per year. The shortfall is compounded due to the shortfall in site availability meeting the local plan target. Therefore the Council is overall not making a significant impact upon addressing housing need.

### **Homelessness and housing needs**

- 77 There is an area where weaknesses outweigh strengths. The service is able to demonstrate elements of this service area that are improving with a focus on prevention which has resulted in reducing numbers of customers presenting as homeless. However, weaknesses with accessibility to the service, capacity and the provision of information are impacting on the overall effectiveness of this service.
- 78 The extent and availability of housing advice services is limited. Although advice services through surgeries were introduced in 2005 staff are limited in the time they have to offer in depth advice and support to customers. In addition advice and homelessness assessments are carried out in some instances by the same officer, which can affect objectivity in determining a homelessness application, and this weakens the overall approach towards the provision of effective homelessness prevention.
- 79 There has been no user involvement in designing the homelessness service. Service standards have not been developed, surgery opening times were set by officers and the absence of satisfaction surveys means that customers are excluded from any attempts to influence the way the service is delivered. This does not enable the Council to effectively shape service delivery for the benefit of users.
- 80 Data on service users is collated but not used strategically. The homelessness team collects details relating to customers such as ethnicity, gender, age and location, which is used primarily to complete statutory returns. It is not used to tailor services or to identify whether there are any issues for diverse groups.
- 81 Assistance to residents who are not considered to be statutorily homeless is limited. Staff offer general advice such as where to find accommodation, but in terms of offering practical support, this is limited as resources are prioritised to assisting statutorily homeless customers. This means the Council is unable to provide a comprehensive service to all residents who are having difficulties in finding suitable accommodation and does not indicate a comprehensive approach towards homelessness prevention.
- 82 The Council is not sufficiently focussed on the long term prevention of homelessness. For example, although information is provided about properties available for rent in the area, there are no checks carried out to determine if they are suitable.

Lists of estate agents and landlords are provided, but because they have not been inspected, it is possible that customers are being directed to accommodation which does not meet statutory requirements or are managed poorly by landlords. Waveney is therefore not providing good quality information and options for vulnerable people.

- 83 There are no effective procedures as a reference point for staff delivering the service. Although training is provided for new staff there is no homelessness manual in place, and there is a reliance on the more experienced members of staff to provide advice to others including new staff. This exposes the Council to challenge when legislation is incorrectly interpreted in the event of the absence of experience staff and advice services not complying with the community legal service standard. This also demonstrates a lack of commitment to providing the best possible service to customers.
- 84 The arrangements to ensure staff are comprehensively updated on new legislation are informal and staff lack comprehensive training. Updates are circulated and team meetings are used to share information, but courses run by external providers are not used regularly due to financial constraints and capacity issues. This limits the effectiveness of the Council to ensure that actions comply with legislation and good practice.
- 85 The Council is unable to confirm the outcomes of the procedures with social care relating to 16 and 17 year olds. Waveney has jointly developed procedures to deal with presentations from this group. However there has been no review undertaken to determine if the procedures are effective and to confirm the outcomes and managers are unable to confirm the effectiveness of the arrangements.
- 86 The service has effective arrangements in place with partner agencies. For example, homelessness services have been specified through service level agreements (SLAs), which cover the relationship with the citizen's advice offices and the women's aid centre and the provision of suitable temporary accommodation by a local housing association. Partners are clear about their role and contribution towards the service.
- 87 There is an adequate supply of temporary accommodation for homeless households. Staff have a list of over 108 units, which are made up of the Council's own properties, social rented and those leased in the private rented sector. Properties are inspected through a contractual agreement with a local housing association to ensure that they are suitable and meet quality requirements established in the temporary accommodation handbook. The number of units includes two which can accommodate disabled customers, which has been sufficient to meet the needs of all customers in need of temporary accommodation.

- 88 Customers who are placed in temporary accommodation are provided with an informative and detailed information pack. This outlines their rights and responsibilities and advice on budgeting, as well as details on housing benefit and the re-housing process. Although this is a positive initiative the overall effectiveness is limited as the handbooks do not contain straplines indicating their availability in alternative formats such as large print, tape or Braille.
- 89 The Council has been successful in reducing the use and costs of bed and breakfast (B&B) and hostel accommodation and is working towards the elimination of the use of B&B. The latest monitoring reports show that the average length of stay in B&B is five weeks which is below the governments targets of six weeks. The average stay in hostel accommodation is 29 weeks. This has reduced expenditure on B&B dramatically and enabled significant savings to be achieved.
- 90 Initiatives aimed at offering support to vulnerable customers are delivering successful outcomes. The Homefinder scheme aims to assist potentially homeless households to access accommodation by paying the deposit, bond and any administrative fees to private landlords, and so far it has assisted over 50 people. A rent guarantee scheme is also available but this has had a limited impact so far with only two people making use it as the Homefinder scheme is seen as far more attractive by customers.
- 91 Homelessness officers actively signpost customers to relevant support agencies, with their approval. Links with a number of agencies are well established and are used when support needs are identified either at the initial application stage or during the tenancy. However, staff do not develop support plans with customers which would provide a useful record of the needs of the customer and how they are to be addressed.
- 92 A number of links have been established with providers of supported housing including housing associations and charitable organisations. When an interview is concluded, the relative responsibilities of both the customer and Homelessness Officer are agreed and both parties sign the housing advice form. This is a useful way to confirm the agreed action and to enable progress to be reviewed.
- 93 The outcomes of advice are recorded in almost all instances. The Council's performance data confirms that approximately 33 per cent of cases are closed after the initial point of contact. Where further advice is given and cases monitored, management information demonstrates the impact the new advice service is having in preventing homelessness, and the numbers of people presenting as homeless is down by over 40 per cent within the last nine months.
- 94 Systems are in place to review the consistency of investigations and advice. Line managers review case files and where information is missing or the investigation has not been completed, the file is handed back to the relevant officer to resolve promptly. Reports are also used to identify trends in performance and how they compare across the team. We noted from our file checks that in general they were well organised, although customers had not signed a form to authorise officers to investigate their personal circumstances.

- 95 The performance on processing homelessness applications is meeting the Council's targets. Within the last eight months 915 customers visited the housing advice office and 207 presented as homeless. The average time to make a decision is within the target of 33 working days, with performance being an average of 11.2 days. Positively 94.9 per cent of all applications are processed within the 33 day target.
- 96 The appeals procedure relating to the homelessness service is clear. The decision letter outlines the fact that where a customer is unhappy with the decision, they can appeal against the decision and they are referred to other agencies who offer independent advice. Since April 2005, 16 have been submitted and over half have been upheld. All appeals are conducted within specified times and this ensures that all applications are promptly processed.
- 97 The Council has made reasonable progress to review the strategic direction for the homelessness service. The Council developed its homelessness strategy in 2002 and it is currently being reviewed through the established homelessness forum. The review commenced in June 2005 with key stakeholders and the strategy action plan is scheduled to be completed by April 2006. This will enable the Council and partners to build upon the current strategy.
- 98 Staff are establishing productive links with schools to share knowledge on housing related issues. A member of the housing advice team has visited two schools recently to discuss simple money management as well as homelessness related issues. The sessions have been well received and requests for further sessions have been received, and this is a useful way to establish links with young people with a view to preventing homelessness in the district.
- 99 Strategic links are being strengthened through the homelessness forum. Forum members are actively involved in agreeing the objectives for the revised action plan and in particular how they can deliver shared outcomes. This should assist in maximising access to housing advice and the supply of suitable accommodation in the area, and is a more effective way of involving stakeholders in the development of strategic objectives.

### **Private sector**

- 100 There are significant weaknesses in this area. The service is underdeveloped and performing poorly in grant administration. The approach to this aspect of the business is reactive, with no targets in place to improve unfitness levels. Preparations for new legislation covering the registration of Houses in Multiple Occupation (HMOs) and loan schemes are under-developed and high risk HMOs are not being inspected.
- 101 The Council has not adopted a modern approach to private sector renewal. The annual budget of £1 million is predominantly spent on disabled facilities grants (DFGs), and the approach towards the private sector is not strategic, with no linkages to achieving decent homes in the private sector or reducing unfitness levels in particular areas.

New approaches which have been successfully established at many other local authorities such as loan schemes, advice and the establishment of a home improvement agency (HIAs) have not been introduced at Waveney. The Council is not working effectively or efficiently in addressing poor housing conditions in the private sector.

- 102 The private sector housing team is failing to assist in delivering objectives within the homelessness and housing strategies. The relevant service plan has not established any targets which relate to achieving decent homes in the private sector, in accordance with PSA 7. Staff, including senior managers, do not understand the DHS requirements in the private sector and are not involved in monitoring or reviewing the progress of either strategies.
- 103 The Council does not provide effective information about renovation grants. The publicity on renovation grants and disabled facilities grants is limited to a leaflet and details on the Council's web site. The leaflet covers the grants available and offers a reasonable level of information on the grant system. However, where it was available, staff experienced difficulties finding it and the fact that the text is in small print and not straplined to inform customers of alternative formats, reduces its use for some service users.
- 104 There are a lack of service standards and guidance across the service. Once the service is made available, customers using the private sector housing service are not offered any detailed guidance on how it is delivered. Service standards have not been developed and although staff explain the grant process, there is only one leaflet available to outline the complex process. Given the fact that most of the applicants are elderly, the Council is failing to provide comprehensive and user friendly information to customers.
- 105 The Council does not offer an agency service to grant applicants. Opportunities to deliver a customer focused service and lever in additional revenue resources by charging an agency fee are being missed. On the basis that a fee level of ten per cent was charged, £90,000 of revenue income could be generated and therefore Waveney is missing opportunities to maximise income.
- 106 There are significant delays in the processing of grant applications. Customers can wait up to 14 months to have their application approved due to the shortfalls in numbers of staff. Customers are not routinely updated on the progress of their application and the subsequent uncertainty does not result in a customer focussed approach.
- 107 Feedback arrangements for grant works are underdeveloped. Although customers are asked to indicate whether grant works have been completed to their satisfaction they are not asked what their views are of the overall quality of the service they received. While it is positive that before a contractor is paid, the owner of the property is asked to authorise the payment, satisfaction surveys are not carried out for any service provided by the private sector housing team. Opportunities to obtain positive feedback and suggestions as to how the service can be improved are being missed.

- 108** There are significant delays for some residents waiting for an occupational therapist (OT) assessment. All enquiries to the County Council's social services department are prioritised, based on a desk top assessment, into three categories. Although it is positive that those which are urgent are visited within 48 hours those in the lowest category can wait up to 14 months for a visit.
- 109** However, DFGs are processed efficiently once a referral is received from the OTs. The referrals are prioritised and urgent ones are processed within four to six weeks, while others are approved within four months. Following approval works are completed promptly and this ensures applicants do not have a significant wait for the works once the county council has dealt with the matter.
- 110** The procedures for the management of DFGs are weak. At an operational level staff have a close working relationship with OTs and joint visits are regularly undertaken to discuss prioritisation and also the most appropriate way to install adaptations. However, staff are generally unaware of the waiting time for an assessment by an OT and are therefore unable to provide customers with this information at the point of application. In addition regular meetings are not held between the two organisations to review performance and establish improvements to the service and, finally, there is no undertaking of satisfaction surveys and therefore there are no details on satisfaction levels for the whole process.
- 111** The Council is not addressing the problems associated with empty properties in the district. The most recent evidence shows that this is a significant issue as there are 962 homes which have been empty for over six months. There is no strategy in place, none were returned to use last year against a very low target of five and there are no plans to address the issue. This means residents continue to live next to empty properties which causes blight and can lead to the deterioration in neighbourhoods.
- 112** There are significant shortfalls towards enforcement activity within the team which are preventing the provision of a quality service. There is a lack of management capacity in enforcement and, without experience of the area, HMOs are not being inspected. This represents a significant risk to people who live in HMOs and places the Council in breach of its legal obligations. Fire officers confirmed that the Council has failed to respond to their requests to inspect HMOs and added that they found it difficult to communicate with the section. The Council is failing to deliver its statutory duties and increasing the likelihood of legal action against the authority.
- 113** The Council is failing to ensure HMOs and particularly high risk properties are inspected. According to the housing strategy and the stock condition survey, there are over 1,000 HMOs in the area. However this is disputed by officers who confirmed there is no information available to identify which ones are three storeys and above which are considered to pose the greatest risk from fire. The confusion has arisen as Waveney is not using the definition laid down in the Housing Act 1985. In addition such properties will have to be licensed from April 2006, and the Council is still to establish proposals to address this. In the absence of a robust approach towards HMOs the Council is failing residents who live in potentially dangerous properties.

- 114 The approach to enforcement is reactive and not customer orientated. Inspections are only carried out following a report from a resident. When this happens, there are no targets in place to respond to such communication. Three to four reports are received every week regarding unsatisfactory housing conditions, but customers are offered no details of how long the reported complaint is likely to take to resolve or when they will to receive a visit.
- 115 The Council is not effectively prepared for the implementation of the housing health and safety rating system (HHSR) to be implemented with effect from April 2006. Most staff are aware of the implications of the new approach to improving house conditions but there has been no investment in software such as hand held computers to enable staff to inspect properties in accordance with the guidance. In addition staff have not had the opportunity to pilot the new approach which would enable them to apply the knowledge they acquired. The Council is not in a position to respond effectively to the new legislation.
- 116 There has been limited formal action to improve conditions in the private rented sector. In the period between January and December 2003 only 18 statutory notices were served of which 16 were complied with. Given the fact that the house condition survey revealed high levels of unfitness in the private rented sector, this level of activity makes very little impression on conditions within the sector.
- 117 Waveney has made poor progress towards developing new initiatives aimed at improving private sector conditions. Only one resident has benefited from a re-location scheme and a compulsory purchase order has recently been confirmed by the ODPM, which has taken seven years to conclude. The Council has been ineffective at improving private sector housing conditions.
- 118 The Council is working positively towards ensuring that applicants for grants receive all eligible benefits. Grant applicants are actively encouraged to investigate their entitlement to benefits. Staff dealing with grant applications are aware of the need to ensure customers are receiving their full entitlement to benefits particularly when they are disabled. This has resulted in some gaining access to additional income as well as reducing their contributions to grant works.
- 119 The approach towards the administration of grant files is weak. The files we looked at had no records of visits to properties to carry out a survey or to confirm the progress of renovation works. Although all files contained costs sheets none had a survey form to indicate the condition of the property before awarding a grant. As a result it is difficult to follow the sequence of events and establish barriers towards the improvement of the service.
- 120 The service plan for the private sector housing service fails to address local and national objectives. The environmental health service plan lists three actions for the private sector housing team, two of which relate to spending budgets on time and approving grants within six months. Another relates to the licensing of HMOs. There are none which link to empty properties or addressing decency levels. As there is no team plan or targets for individual officers, it is not possible to monitor progress robustly or to confirm how other actions will be delivered.

## Is the service delivering value for money?

- 121** Overall this is an area of weakness. The Council has not systematically or consistently undertaken benchmarking of costs and therefore has limited information and awareness that services are achieving value for money. This limits the ability of the Council to shape services allowing for local context, performance and policy choices.
- 122** Waveney does not have a robust strategic approach to ensure that services deliver value for money. The approach towards value for money is driven through the need to achieve budgetary savings and not through an evaluation of options to deliver value for money. Priorities are not clearly defined and the Council is unable to establish effectively linkages between the allocation of resources, quality and overall performance.

### How do costs compare?

- 123** The Council has a limited awareness of how its costs for service provision compare with other service providers. Cost comparisons are known for the use of temporary accommodation against other providers and these costs are analysed and reported to enable valid comparisons to be identified. However transactional costs have not been assessed as the Council has not developed local cost indicators to monitor trends. In addition the Council is not undertaking regular monitoring and reporting of costs consistently across other service areas. Therefore the Council has little understanding of costs for service provision and is unable to compare costs meaningfully with other service providers.
- 124** Positively the Council has reduced the costs for B&B accommodation through undertaking comparisons and achieved significant savings. For example in comparing costs the Council identified the difference between the most and least expensive temporary accommodation service providers amounted to approximately £115,000. When coupled with the initiatives to reduce the use of B&B below the Government's targets of six weeks the Council has reduced expenditure significantly. To date £11,700 has been spent against a budget of £43,000, while last year £326,000 was spent on the cost of such accommodation. The Council has been able to achieve a significant reduction in its costs through the application of these measures.

### How is value for money managed?

- 125** The approach towards value for money is underdeveloped and the Council is unable to demonstrate that the strategic housing service delivers value for money. Although Waveney has been able to identify and establish savings these are being used towards reducing overall Council overspending and not on service improvement, and are not strategically linked to service priorities.

- 126 Waveney has not established a robust strategic approach towards value for money. For example, although 17 priorities have been identified, value for money is not specifically identified as one of these outward facing priorities or effectively considered within the housing strategy. In addition services have not been reviewed to challenge the way they are delivered or to confirm if they deliver value for money. The approach towards value for money has not been sufficiently prioritised.
- 127 Waveney's approach towards efficiency gains lacks clarity. Although the Council is proactively seeking savings in its overall revenue expenditure it is unable to demonstrate a clear relationship between its costs and the quality of the service provided. It is actively seeking savings to reduce overspending of revenue budgets and reduction in reserve levels, and so savings are being driven by the need to reduce overspending and not through ensuring the provision of a value for money service. In addition the Council's self assessment has clearly indicated that their aim is to ensure that its council tax remains the lowest in Suffolk; however, this view is not confirmed within the Council's medium term financial plan. There is, therefore, confusion and a lack of clarity about the Council's policy towards efficiency.
- 128 At a service level the approach towards value for money is underdeveloped. Although it is positive that the Council seeks to ensure that all service plans make efficiency savings, in accordance with the Gershon agenda, the approach is mixed. Some service plans have not included target dates and in others the amount of savings being sought have not been detailed. Efficiency savings have been inconsistently addressed by the Council and this will lead to inconsistent outcomes.
- 129 Waveney has limited awareness of the actual cost of service provision. It has not established robust service level agreements between the service and the corporate centre, and the service is unclear if central services are providing value for money, what the rationale is for overhead recharges and how those costs are contributing to the level and quality of the service being provided.
- 130 However, the Council has achieved savings in service delivery. Within the Gershon framework clear targets for value for money savings have been established. Although the Council achieved £143,000 cashable savings in 2004/05 and is on target to meet its Annual Efficiency Statement target of £815,000 cashable and £150,000 non-cashable savings for 2005/06, there are, no specific targets for housing. However, the statement reflects savings that are being achieved through reducing reliance on B&B to accommodate homeless people by more efficient use of the Council's housing stock, partnership working with housing associations and private sector landlords. In the absence of specific targets it is difficult to measure progress against the planned savings sought.
- 131 Systems to identify unintended high spending are not embedded. Waveney has introduced systems to ensure that capital and revenue budgets are reviewed on a monthly basis. This includes the establishment of an efficiency review group which regularly reviews performance against budgets and has regular meetings with managers. However the approach is of limited use as under spending in areas such as grants have not been adequately identified and addressed.

- 132** The Council's approach towards procurement is underdeveloped. Waveney has a dedicated team to enable greater focus on purchasing and cost savings. The team seeks to ensure that any procurement decisions in excess of £1,000 are referred to them for evaluation. However front line staff and managers have not been trained in its application and are not fully aware of the strategy, and key targets to achieve savings of five per cent by December 2005 have not been achieved.
- 133** In addition, the Council's procurement strategy is of limited effectiveness. Although positively the procurement strategy has been recently re-written it is not embedded to deliver tangible benefits. The approach towards procurement has been traditional and the Council has not explored long term partnering to improve efficiency. Although Waveney is obtaining savings through this approach it is not consistently seeking the right combination of cost and quality.
- 134** Waveney is seeking to work jointly with GYBC to ensure greater efficiency, in areas such as procuring a study on empty homes, housing needs assessment, housing market assessment and also a joint land survey. Such an approach will ensure greater impact and awareness at a sub-regional level and increase economies of scale.

## Summary

- 135** Overall we have judged the Council's strategic housing service to be a poor 'no-star' service.
- 136** Offices and services are not readily accessible and do not comply with the requirements of the Disability Discrimination Act 1995. Service standards, where they have been developed, are not effectively promoted to customers and there is a lack of leaflets providing information about services. The Council's approach towards diversity is weak and it is not demonstrating leadership to enable it to effectively progress and prioritise diversity.
- 137** The Council has improved its approach towards Strategic Housing Services and its housing strategy was assessed as 'fit for purpose'. However the Council has not effectively built upon the strategy and lacks up to date information in a number of areas. The strategy also lacks a robust action plan and monitoring mechanisms to ensure that key actions are delivered. Although the Council can demonstrate a focus on progress on achieving the decent homes standard in its properties is not monitoring progress in other tenures. There are key shortfalls in the provision of the private sector housing service which have not been addressed and overall the service is underdeveloped with shortfalls in strategy development in a number of areas. The consequence of such shortfalls in the service can have serious health and safety implications on residents of HMOs as the lack of prioritisation and focus is putting people at risk.

## 34 Strategic Housing Services | How good is the service?

- 138** The housing advice and homelessness service is a service area that is demonstrating signs of improvement. Homeless applicants are given clear guidance and support and are offered accommodation of a good standard and applications are dealt with in a prompt and timely manner. The Council is working well with partners to ensure that homelessness services are effectively delivered. However there remain a number of weaknesses against which the Council has made limited progress, for example the limited provision of housing advice and information for non-priority applicants and engaging with service users to shape delivery of the service.
- 139** Waveney DC has limited information and awareness that services are achieving value for money, and lacks a robust, strategic approach towards ensuring that services delivery value for money. Priorities have not been clearly defined and the Council is unable to establish effectively linkages between the allocation of resources, quality and overall performance.
- 140** Although Waveney has improved its enabling role, and has in place a number of strategies and policies that seek to increase the delivery of affordable housing in the district, the number delivered has been below its own target.

## What are the prospects for improvement to the service?

### What is the service track record in delivering improvement?

- 141 Overall this is an area of weakness. The Council is not able to consistently demonstrate a track record of delivering service improvements across the strategic housing service. Performance in a number of areas is underdeveloped and it cannot demonstrate that its approach towards value for money is embedded in its culture or its operations. Although Waveney has addressed some key weaknesses identified within the Comprehensive Performance Assessment decent homes standard diagnostic, improvements have not been fully effectively established or embedded.
- 142 The Council has made limited progress towards addressing many of the weaknesses identified within its DHS diagnostic. The Council has made progress by:
- reducing the numbers of properties that do not meet DHS from 38 per cent to 35 per cent;
  - completing its options appraisal and reaching a corporate decision to recommend stock transfer to assist in achieving DHS for the housing stock;
  - ensuring that both the housing strategy and housing revenue account business plan are fit for purpose; and
  - introducing improved performance management reporting and financial monitoring systems.

However the Council has not addressed any of the value for money weaknesses or undertaken evaluation of completed works. Although there has been progress Waveney has been slow in addressing all the identified weaknesses.

- 143 Waveney has made limited progress in delivering outcomes against the housing strategy action plans. The Council has not effectively built upon its positive 'fit for purpose' assessment and it is evident that some service areas are starting from a low base. Although the Council has made some progress in the homelessness and housing advice services, and strategy and enabling service areas, performance within the private sector services has been weak. The Council has, therefore, made little progress against its priorities.

## 36 Strategic Housing Services | What are the prospects for improvement to the service?

- 144** Despite this, Waveney has delivered improvements over the last three years which provide discernable benefits to service users. These include:
- homelessness prevention initiatives which have reduced the numbers of acceptances. For example half day surgeries for housing advice have been introduced, which has reduced the time taken to make homelessness decisions;
  - facilitating the conversion of difficult to let properties in conjunction with partners to provide supported accommodation for young single mothers and homeless families and therefore reduce the use of and reliance on B&B;
  - introducing a private sector leasing scheme which has resulted in the provision of better quality temporary accommodation;
  - the change of use of some properties in conjunction with partners to increase the provision of housing for homelessness households; and
  - providing information booklets for households placed in temporary accommodation to ensure that applicants have information and advice about their tenancy.
- 145** Aside from the homelessness service the performance of the service against targets is weak. Although Waveney has improved its performance in a number of performance indicators, actual performance did not meet the agreed targets last year for private sector housing and homelessness. The Council's performance indicators relating to the homelessness service are improving and the average stay in B&B has reduced from over nine months to less than six weeks within the last two years. Appendix 2 shows that of the six indicators for homelessness, two out of three have improved, with one remaining the same. The remainder have no trends, with only one relating to advice casework being below target. There has been no progress to bring properties back into use and the target for 2005/06 will not be met.
- 146** The private sector service has deteriorated within the last three years. The waiting list for renovation grants is now at least 14 months compared with three months two years ago, HMOs are no longer inspected and a coherent approach to addressing the issues relating to empty properties has not been developed. The service is making little impact in terms of private sector housing and is not able to demonstrate an effective track record.
- 147** Customers have had no influence on service improvements. Although feedback forms are available at reception points satisfaction surveys are not routinely carried out and there is little evidence that regular consultation with users is being undertaken. Therefore any improvements to services have been internally driven and reliant on capacity of teams to deliver them.
- 148** The Council's track record demonstrates an increasing awareness towards improving value for money although the approach is not embedded. There has been progress made to increase the income from Housing Benefit through more effective completion, management and submission of claims. In addition savings are being realised following the introduction of charges and homeless prevention initiatives to include more robust decision-making.

These have contributed to savings in this area. However the approach towards value for money is inconsistently approached through the service planning framework.

## How well does the service manage performance?

- 149** This is overall an area of weakness for the Council. Although Waveney has established aims and priorities for the immediate future through its high level improvement plan it has not established a robust framework to ensure progress is systematically monitored. The approach towards financial management and performance management is improving but is not embedded and is not strategically linked to service priorities. In addition the housing strategy does not contain SMART targets and its monitoring is not embedded. Improvement planning is not consistently focussed on the delivery of outcomes to customers or targeting poorly performing service areas.
- 150** The approach towards the management of performance has started from a low base. The Council has not undertaken a fundamental review of the strategic housing service and therefore little use has been made of best value principles to challenge the way services are delivered. There is little customer involvement in the service planning process and front line staff are not effectively involved in the service planning process. As a result of this the service shortfalls have not been readily identified or acted upon.
- 151** The high level improvement plan (HLIP) 2005-07 is of limited effectiveness towards driving improvement in the strategic housing service. The plan seeks to ensure clarity in the short to medium term to enable the Council to effectively monitor performance against weaknesses and is reviewed on a monthly basis by the Council's Scrutiny Committee. Many actions within the plan have been addressed but a number of actions are not SMART and a number of high risk actions involving private sector housing have not been adequately addressed and reported. This limits the effectiveness of the HLIP and does not enable stakeholders to readily establish an accurate assessment of performance.
- 152** Waveney has not established a robust performance management framework to assess the effectiveness of its strategic managers. A new approach to performance management was introduced in August 2005 and has still to be embedded. A number of tasks have still to be completed such as the allocation of key performance indicators for the Chief Executive and senior managers. Therefore performance management and measures to establish the effectiveness of senior staff are still to be embedded and this remains an area for improvement.
- 153** The service aims and priorities of the housing service have not been developed in consultation with stakeholders. Although the service aims and priorities were developed through a consultation event this was held in 2002 and is out-of-date. The Council did not consult stakeholders effectively in the formation of the current housing strategy and therefore the service lacks a robust and shared consensus of what housing priorities are to be addressed within the strategy.

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- 154** The housing strategy as the overarching improvement document for the service is of limited effectiveness. Although the housing strategy is subject to a robust risk assessment many actions are not SMART and the plan has not been subjected to a challenging review process since its publication. The plan does not establish priorities clearly against identified needs and lacks clear milestones for many longer term actions resulting in vague targets and outcomes. As a result of this the overall effectiveness of the action plan is reduced.
- 155** The Council's approach towards service planning is not fully developed. It has recently introduced a service planning framework across all service areas and has clearly articulated its objectives and priorities to ensure all service plans are aligned to the strategic direction. However service plans and their corresponding objectives and targets have been developed by managers with no effective consultation with service users and front line staff. In addition, service plans contain very few objectives for teams and individuals to drive forward service improvements. Therefore there is a lack of knowledge regarding the content of plans and what the service is seeking to achieve and deliver.
- 156** There are further shortfalls in the establishment of service plans. A number of actions within service plans are not SMART and do not contain challenging targets for all key actions. In addition the Council has not developed sufficient local indicators for key service areas such as grants administration, and the strategic housing service is represented within several service plans. The effectiveness of the service planning framework is limited as stakeholders cannot readily and accurately establish performance and what the service is seeking to deliver.
- 157** Although progress has been made to improve the reporting and monitoring of performance through service plans the approach is not fully embedded. All service plans action plans are reported on a quarterly basis to Scrutiny Committee on an exception basis. The reports are traffic light colour coded to ensure that positive, steady and poor performance is readily identifiable. The reporting of performance is supported by a new IT reporting system that enables the reporting of performance through the Council's intranet and quarterly updates are places on notice boards. This enables staff and councillors to readily access details about the current trends of performance indicators as well as detailed budgeting information. However service plans are not regularly reviewed by officers and managers and therefore progress against key issues is not being effectively progressed, which limits the usefulness of the service plans.
- 158** Performance management at a service level is not consistently undertaken by managers. The strategy and enabling and homelessness and housing advice teams ensure that performance is reviewed on a weekly and quarterly basis through the establishment of performance review meetings. However, the same is not undertaken within the private sector housing team and this results in differences in the way performance is reviewed and action plans developed and implemented.

- 159** The monitoring of financial management is improving but is not fully embedded. The Council has established an efficiency review group that meets on a regular basis to ensure that savings are in accordance with planned proposals. The approach includes monthly meetings held by accountants with all senior managers to establish performance against planned budgets. Although this ensures that the Council is monitoring expenditure the systems to control expenditure on grants are poor. Managers and staff have difficulty in obtaining accurate or timely information to confirm spend against budgets and there is a reliance on accountants to provide the information for them. For example, despite the high demand for renovation grants, the budget was under spent last year by almost ten per cent. At the time of the inspection, three quarters into the financial year, only 55 per cent of the budget had been spent. Financial management systems are not robust in providing timely information to managers to enable the delivery of effective services.
- 160** The Council is seeking to improve customer service through proposals to move into new offices in conjunction with partners. The Council, Suffolk County Council and the Centre for Environment, Fisheries and Aquaculture Science (Cefas) have recently agreed to relocate to one site in Lowestoft. A move to more modern offices should provide the Council with opportunities to improve accessibility to services for customers and reduce maintenance costs.
- 161** The Council is not consistently demonstrating leadership to the community it serves. Recent changes at a senior management level within the Council have still to demonstrate effective leadership. Although Waveney can cite examples of leadership through its establishment and implementation of the HLIP and support of the options appraisal that seeks LSVT, decisions regarding the core business activities for the Council have still to be made despite agreeing an increased enabling role in August 2005. In the interim the Council has many priorities and decisions about what constitutes a priority, and more importantly what is no longer a priority service, have still to be made.
- 162** The Council lacks effective mechanisms to drive forward service improvements. Service plans do not cascade performance requirements to an individual level. Many staff are still to have appraisals or have an effective analysis of training needs carried out. Team and staff meetings are not being held on a regular basis to discuss performance and other issues and therefore are not being used to agree specific targets to enable an accurate assessment of performance to be made.
- 163** Waveney's approach towards learning is mixed. Positively the Council has received formal training and written guidance from a London authority and an ODPM advisor on homelessness legislation and vulnerability. In addition the Council has used internal audit reviews of services to review financial arrangement. New staff members are given training on homelessness legislation jointly with a neighbouring council, and in addition the Council has used an external consultant to undertake a health check on the homelessness service. This has been used to identify and address some of the weaknesses in the service such as the lack of procedures and the need to develop more effective links with other agencies.

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The Council has applied this learning to enable more robust decision-making. However the approach is not consistent or shared with other teams as they are not able to demonstrate a similar proactive approach towards learning.

- 164 Waveney has not established mechanisms to learn from customers. The Council has not used its comments, compliments and complaints procedures to systematically analyse feedback, and in addition the Council is not undertaking satisfaction surveys to establish customer feedback about services provided: for example, the Council is not undertaking surveys of grant applicants or those receiving homelessness and housing advice. Waveney is missing opportunities to capture and monitor feedback which can be used to inform and improve service delivery.

### Does the service have the capacity to improve?

- 165 This is an area of weakness for the Council. The Council does not effectively and consistently demonstrate that it has the capacity to improve. Changes in personnel at an officer and councillor level are still to be embedded. The ability to develop services is restricted significantly by the lack of human and financial resources, a clear structure and the lack of experience in a number of areas.
- 166 The Council's structure towards delivery of an effective strategic housing service is fragmented. Positively in recognition of the structure shortfalls Waveney has created a new single structure for strategic housing services that is to be implemented by April 2006. Currently senior managers and some key councillors are relatively new to their roles and have still to develop their knowledge of private sector housing. In addition the service is delivered through a number of teams spread across two Portfolio Managers, which results in inconsistencies in approach towards and management of the service.
- 167 Staff morale is low within the services inspected. Officers expressed little optimism about whether services would improve. There are also capacity shortfalls in the strategic housing service which are impacting on the Council delivering an effective service. These include the following.
- The vacant post of Housing Strategy Manager within the housing strategy team has not been filled for some time and the decision has been taken to fill this post at a lower level and fund a research post. This contributes to the lack of understanding and awareness of housing needs in the district and impacts on the ability to keep information up to date.
  - There is a lack of experience and staff with the required skills in the private sector housing team. A key vacancy for a Technical Officer has remained unfilled for a considerable period and some staff have been placed in positions with little or no previous experience of the service area. This has impacted on the ability of the team to enable enforcement activity to be delivered effectively, prepare for new legislation and resulted in long delays in discretionary grant administration. In addition and more critically HMOs are not being inspected and therefore the Council is failing to deliver its statutory duties.

- The homelessness and housing advice team is hampered by the shortfall in capacity which is preventing the team from comprehensively undertaking casework intervention.
- 168** The Council's approach towards effective human resource planning is improving. The Council has recently agreed a three-year workforce development statement, strategy and plan. The strategy aims, through effective people management, to ensure that the capacity of the organisation is fit to achieve its strategic priorities, in a manner that is consistent with the Council's core values and the approach is supported through the service planning framework whereby service managers were asked to anticipate their team's future workforce requirements. However, as the plan has not been fully resourced and also lacks challenging targets this will limit the plan's effectiveness.
- 169** The Council has not maximised capacity through training. It has invested in training provision for key staff through its Organisational Development Programme but not on service priorities. All managers have attended management development training and most front line staff have attended diversity and equality and customer care training. However, training needs and skills have not been systematically identified and therefore training has not been delivered in accordance with the delivery of service objectives.
- 170** The Council has not established sufficient budgets for the training of staff. Although some staff have benefited from attendance at training courses there is a limited budget to ensure training needs are adequately addressed. The Council has allocated £27,000 corporately for 1,000 staff which equates to £27 per officer. The budget provision for training is insufficient to meet the needs for all staff and will result in fewer personnel receiving training.
- 171** The Council has made IT investments which have realised benefits and improvements. Investment in new IT systems has been made for revenues and benefits, performance management, homelessness and environmental health. Although new systems for the private sector service have been implemented, offering increased management information and budget monitoring, the systems are stand alone and not integrated to other systems. In addition, a new IT system introduced within the homeless section has not been integrated and due to restrictions on the number of users at any one time this has resulted in information not being effectively shared, for example with housing benefits. This has led to increasing processing times and frustration of officers using systems. The absence of fully integrated systems has limited the effectiveness of new IT investments.
- 172** Communication with staff and residents is not consistently improving. In our discussions with staff, it was apparent that the need to consult and communicate more effectively with customers is seen as an area for improvement and one which has not been successfully addressed to date. The appointment of a communications manager and the establishment of a consultation strategy are positive steps and the Council has been able to demonstrate improvements in its internal communications over the last 12 months.

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There are a number of mechanisms used to share information within the organisation including a weekly bulletin from the Chief Executive, monthly meetings for portfolio holders and staff seminars every six months, which enable staff to access relevant information and offer feedback on their views.

- 173 The Council's 2005-2010 medium term financial strategy is weak and of limited effectiveness. Positively the strategy seeks to support the strategic direction, has established a council tax target level for the next three years, and adopts a zero based budgeting approach. However it does not clearly identify spending and assumptions up to 2010 and therefore does not establish resources for the strategic housing service. In addition the strategy does not clearly identify the implications of the move to new offices and also the impact of LSVT proposals. These will both impact on the Council which ever decision is reached and therefore limit the usefulness of the strategy in the medium term.
- 174 The Council has been successful at a strategic level in attracting inward investment. Waveney in conjunction with partners has enabled new investment of £14.7 million to improve and regenerate the sea front. Funding has been secured for the Waveney Sunrise Scheme which seeks to increase business development and tourism and create new jobs and improve prosperity and sustainability for the district.
- 175 The approach to procurement is not effectively contributing towards the delivery of a value for money service. The Council has not consistently undertaken procurement decisions which have taken into account quality and cost considerations or the long-term cost implications of service users; procurement has, instead, been based on short-term lowest price tenders. Waveney lacks an overarching and robust strategy towards the delivery of value for money and there is a lack of awareness by some officers to achieve value for money in day-to-day activities and decision-making.
- 176 Waveney is developing partnerships on a sub-regional basis to improve capacity. Some services are delivered in partnership with Great Yarmouth Borough Council, such as legal and democratic renewal services, and the intention is to develop more as the Council has accepted it cannot improve services effectively using its own staffing resources. In addition the Council is effectively engaged in partnerships that contribute towards delivery of its housing objectives at a regional and sub regional level. The Council is jointly working with GYBC towards procuring a joint empty homes survey, a housing needs survey and a housing market assessment. At a county level the Council is leading work towards the development of a domestic violence strategy and a home improvement agency to assist vulnerable groups to access grants for repairs and aids and adaptations.

## Summary

- 177** We have assessed that the strategic housing service provided by Waveney has uncertain prospects for improvement. While there are some drivers for improvement there are a number of barriers to change within this service.
- 178** Waveney is not demonstrating an effective and consistent track record of improving performance. Progress to address actions identified within the CPA DHS diagnostic has been slow and a number of actions around value for money and evaluation of works remain outstanding.
- 179** The Council's performance management arrangements are not robust. The Council has too wide a range of priorities and there are key shortfalls with its approach towards service planning. Although performance management and service planning frameworks are in place action plans are not robust and are not being effectively monitored to enable service improvements to be delivered. Leadership is not being demonstrated to ensure diversity and equality shortfalls are addressed.
- 180** The service is short of capacity in a number of areas and training is not sufficiently increasing capacity to enable services to deliver against their priorities. In addition, there are shortfalls in the organisation structure of the service which are preventing consistency of approach and the delivery of a quality service.
- 181** Although the Council is able to identify a number of improvements delivered in the last three years, which have delivered discernible benefits to service users, the majority of these are centred on the homelessness and advice service.
- 182** While the Council has put in place a number of key building blocks which will enable aspects of the service to be improved, such as IT investments which have enabled and delivered a number of improvements, interfacing and accessibility issues are limiting the effectiveness of the investments. Waveney has begun work towards the relocation to a new campus with other partners which, it is hoped, would improve accessibility and customer service.

## Appendix 1 – Performance indicators

**Table 2 Performance Indicators – Waveney**

Indicator	2003/04	2004/05 Target	2004/05 Actual	2005/06 Target	2005/06 Current performance	Status of current performance **
BV 183A Stay in B&B	14	6	7	6	5	Improving
Bv183b Stay in Hostels	21	13	28	39	29	Improving
BV202 Rough sleepers	n/a	Less than 10	3	Less than 10	3	Same
BV203 % change in average no of families in TA	n/a	n/a	n/a	16.48%	7%	No trend
BV213 Advice resolving situation	n/a	n/a	n/a	200	70 to date	Below target
BV214 Proportion of Statutory homeless accepted within last two years	n/a	n/a	n/a	2%	1%	On target
BV 64 Long term empties returned to use	4*	5	0	3	0	Below target

\* qualified

\*\* as at 1 December 2005

## Appendix 2 – Documents reviewed

- 1 Before going on-site and during our visit, we reviewed various documents that were provided for us. These included:
  - corporate strategy;
  - best value performance plan;
  - procurement strategy;
  - annual efficiency statement;
  - housing strategy;
  - homelessness strategy;
  - housing needs survey;
  - private sector stock condition survey;
  - minutes of various meetings;
  - housing revenue account business plan;
  - service plans;
  - race equality scheme;
  - homelessness strategy;
  - self-assessment for the inspection;
  - internal audit reports; and
  - performance indicators.

## Appendix 3 – Reality checks undertaken

- 1 When we went on site we carried out a number of different checks, building on the work described above, in order to get a full picture of how good the service is. These on-site reality checks were designed to gather evidence about what it is like to use the service and to see how well it works. Our reality checks included:
  - interviews with councillors;
  - interviews with key staff within the Council;
  - visits to the Council's main and area offices;
  - staff focus groups;
  - mystery shopping exercises;
  - discussions with some stakeholders;
  - checks of homelessness and private sector files; and
  - visits to temporary accommodation.