



THE SCOTTISH HOUSING REGULATOR

Midlothian Council Inspection Report
May 2008

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1. Introduction

About this inspection

- 1.1 This inspection was carried out by Communities Scotland under section 72 of the Housing (Scotland) Act 2001 on behalf of Scottish Ministers. Our purpose in inspection is to provide an independent external assessment of the effectiveness of housing service delivery and make recommendations to help improvement. Inspections are conducted within a published framework of *Performance Standards*.

How we assessed performance

- 1.2 Our inspectors asked two key questions:
- How well is Midlothian delivering its services?
 - Is Midlothian managed for improvement?
- 1.3 In order to answer these questions inspectors:
- spoke to tenants, service users, staff and elected members of the council;
 - asked other partner organisations for their views;
 - visited homes and local areas;
 - saw and tested first hand how well services were being delivered;
 - examined key policies, publications, information and the organisation's self-assessment submitted for this inspection; and
 - analysed published performance and financial information.
- 1.4 We have awarded grades for the housing management, asset management and delivery of repairs and homelessness services. The grades and judgements are based on evidence. The grades summarise performance in the following ways:
- Grade A = Excellent
 - Grade B = Good
 - Grade C = Fair
 - Grade D = Poor
- 1.5 When we provide a summarised assessment and award a grade, we take various factors into account. These factors are:
- outcomes for service users;

- how far the service or organisation meets Performance Standards;
- performance against key indicators in comparison with others;
- compliance with legislation;
- how good the leadership and accountability are;
- how far good practice is followed;
- the organisation's level of self-awareness;
- how well value for money is being achieved;
- local context and legitimate local priorities; and
- commitment to, and track record of, improvement.

The inspection team

1.6 Kirsty Anderson, Inspection Manager led the team and the team included Inspectors: Jean Harper, David Love, Mark Gibson, Gordon Scobie, Janet McKenzie, Elaine Whyte and Inspection Officer, Sylvia Ward. Tenant Assessors, Wilson Dunlop and Tina Beattie also assisted the team. The inspection team was on site between 21 January and 15 February 2008. We would like to thank everyone involved in the inspection, particularly the elected members, staff, service users and tenants for their time and co-operation.

Responding to this inspection

1.7 We expect all inspected bodies to make the inspection grades and overview section of this report available to anyone that wants it, report our findings to tenants and other stakeholders and respond to the issues raised in this report.

2. Inspection grades and overview

In this section we set out our overall assessment of Midlothian Council's performance, including inspection grades and we summarise our inspection findings.

Grades

2.1 The inspection of Midlothian Council's housing service took place between 21 January and 15 February, 2008. We awarded the following grades:

Midlothian Council has achieved a **D** grade for housing management. This is a **poor** performance.

Midlothian Council has achieved a **B** grade for asset management and repairs. This is a **good** performance.

Midlothian Council has achieved a **D** grade for services to homeless people. This is a **poor** performance.

How well is Midlothian Council delivering its services?

2.2 Our assessment is that Midlothian Council's housing service has some strengths.

In housing management:

- its actions to improve its management of rent arrears;
- its information pack for new tenants; and
- its housing education programme for schools.

In asset management and repairs:

- tenants express good and increasing levels of satisfaction with the repairs service and the capital investment programme;
- its planning and implementation of its investment programmes;
- it is confident that it can meet the Scottish Housing Quality Standard for all its houses by 2015;
- its management of asbestos;
- its approach to Right to Repair; and
- it is working well with partners and local communities to deliver new homes to meet identified housing need in Midlothian, its investment planning for its new house-building programme is good and the new houses are developed to a good standard.

In delivering services for homeless people:

- it interviews homeless people quickly;
- its new initiatives to reduce the Council's reliance on bed and breakfast accommodation; and
- its prevention work through the Mental Health Development worker and the housing education and awareness project for young people.

2.3 The Council however has a number of weaknesses, some significant, in the delivery of its services.

In housing management:

- it provides poor access and limited choice to applicants for housing;
- its approach to managing, cancelling and suspending applications is poor;
- it does not know the outcomes of its lettings or if it is giving reasonable preference to those in housing need;
- its performance monitoring and reporting is poor;
- its performance in managing arrears has been deteriorating for the last three years;
- rent loss due to empty homes is increasing; and
- it does not yet have a full, up-to-date set of housing management procedures.

In asset management and repairs:

- it is not meeting its targets for completing non-emergency repairs; and
- it is not able to demonstrate that its in-house responsive repairs service provides value for money.

In delivering services for homeless people:

- it incorrectly cancels a significant number of applications for assistance from homeless people;
- its out of hours service is difficult to access;
- its recording and reporting of key statistical information relating to the homelessness service is not reliable;
- it cannot demonstrate that it is properly assessing applications from homeless people and meeting its responsibilities to them;

- it does not meet the requirements on the types of advice and assistance it should be offering to homeless people;
- people wait significant periods of time for a permanent offer; and
- its management of temporary accommodation and use of bed and breakfasts is poor.

Is Midlothian Council managed for improvement?

2.4 The Council has some strengths in its approach to managing improvements in its services. It has corporate planning and performance management frameworks and is developing a service plan covering its housing management and homelessness service. It has good strategic plans for its Asset Management and Repairs service and its system allows it to effectively monitor its performance. It has recently improved the Asset Management and Repairs service and has a firm focus on continuous improvement in this service. The Council is acting to develop tenant participation in the area. It has introduced initiatives to reduce expenditure on bed and breakfast accommodation.

2.5 We found a number of areas where the Council needs to make improvements. Its housing management and homelessness planning and performance monitoring is poor. We saw the Council did not act effectively upon the improvement actions recommended in its mock inspection. Its focus for improvement in homelessness has been increased supply, with less focus on improvement of the day to day service. The Council does not carry out a full satisfaction survey although it has surveyed tenants on some aspects of its service. It monitors the speed of response to complaints but it does not monitor outcomes or use this to drive improvement. Although it has introduced initiatives to reduce its reliance on bed and breakfast, it does not have a strategy for monitoring their effectiveness and value for money.

Key recommendations

2.6 Our inspection report covers a wide range of issues. Midlothian Council must respond effectively to them. These are our most important recommendations.

Across all of its landlord and homelessness activities the Council should:

- implement an effective performance management framework;

- ensure it continues to promote equalities issues and mainstreams equalities throughout its activities;
- improve its understanding of service users views of its services; and
- continue to develop its approach to tenant participation.

In housing management the Council should:

- improve access and choice;
- improve its approach to cancelling and suspending applications;
- improve its monitoring of the outcomes of its letting processes;
- develop a more pro-active approach to estate management;
- improve its performance in letting empty houses; and
- continue to work to reduce arrears.

In asset management and the repairs service the Council should:

- continue to improve its performance in response repairs; and
- improve its focus for delivering value for money in the response repairs service.

In delivering services for homeless people the Council should:

- improve the accessibility of its out of hours service;
- ensure it assesses homeless people's applications in accordance with the legislation and guidance and meet its duties towards them;
- improve its data gathering and analysis;
- meet its duty to provide homeless people with advice and assistance;
- improve its management of temporary accommodation; and
- improve its approach to permanently housing homeless people.

3. Context

About the organisation

- 3.1 Midlothian Council is in the east of Scotland immediately to the south of Edinburgh with the Pentland Hills to the west and the Moorfoot Hills to the south. The south of Midlothian is predominantly rural with a number of small villages and hamlets. It is Scotland's smallest mainland authority and shares borders with Edinburgh City, East Lothian, Scottish Borders and West Lothian.
- 3.2 The Council has a Labour administration and has 18 elected members consisting of:
- 9 Labour;
 - 6 SNP;and
 - 3 Liberal Democrats.
- The Council operates a Cabinet and Scrutiny system, with the Cabinet comprising of 7 members, each with their own allocated policy responsibilities.
- 3.3 The Council delivers its housing and homelessness services through three of the five service departments: Corporate Services – Housing Management and Homelessness; Commercial Services – Property Maintenance and Asset Management; and Education and Communities Services – Anti Social Behaviour. The Council delivers the Housing Management and Homelessness Services from a centralised office in Dalkeith, and the Property Maintenance and Asset Management functions from Bonnyrigg.
- 3.4 The Council's average weekly rent level for 2007/08 is £40.45 which is significantly lower than the Scottish average of £48.19. Over the last three financial years, the Council has increased rents above the rate of inflation.

About its current and future tenants

- 3.5 Midlothian's population was just under 80,000 at the 2001 census. Midlothian has 21 main communities and settlements. Most of the population live in the seven main towns of Penicuik, Bonnyrigg, Loanhead, Dalkeith, Mayfield, Newtongrange and Gorebridge. These are all located within 30 minutes travel of Edinburgh city centre.

- 3.6 The population of Midlothian has been increasing in recent years. It has also been aging, although people over 60 within Midlothian account for 17.66% compared to the national figure of 18.61%. The Council expects this trend to continue in future years.
- 3.7 Based on Scottish Government labour market statistics, published in 2003 (and modified April 2007) unemployment in Midlothian is 1.9% which is lower than the national figure of 2.6%. Sixty five per cent of the population are in employment either full or part-time, or are self-employed. This is lower than the national figure of 76%. Earnings in Midlothian are below the Scottish average. The weekly income for Midlothian workers is £453.70, 4% lower than Edinburgh and the Lothians (£472.30) and 5% lower than the national average.
- 3.8 Midlothian has a relatively small number of ethnic minority households. In the 2001 census, the area's black and minority ethnic (BME) population was 0.9%, which is lower than the national figure of 2%. In 2005, the Council established Midlothian Citizens Panel reported that they believed discrimination occurs within Midlothian in respect of race, colour, ethnic origin, age, disability, sexuality, religious belief, employment status and gender. The Council also reconstituted the Equalities Forum with senior management representation from across the authority to work to deliver its Equalities Policy and Action Plan.

About its housing stock

- 3.9 The tenure profile in Midlothian is similar to the rest of Scotland. Owner occupation is the dominant tenure at 64%, 1% above the national figure whilst 30% of homes are rented from the social rented sector. Of this, 77% rent their home from the Council while 23% rent from RSLs operating in Midlothian. In addition, 4.2% rent from the private sector which is about two thirds of the national figure.
- 3.10 The Council has lost over half of its housing stock through the Right to Buy since 1980, and has lost around 3% of its stock during each of the last 3 years. In the last 4 years, Midlothian Council's average rate at which its houses become empty was 4.7%, the lowest rate in Scotland.

3.11 The opening of the A68 bypass and the proposed reopening of the Waverley rail line, which will run through Midlothian, is expected to have an impact on house prices throughout the region. These are currently above the national average. The average sale price for a house in Midlothian in 2003 was £137,159 compared to the Scottish average of £108,281. Currently first time buyers would need to secure a mortgage 6.5 times the average annual salary to afford an average priced home in Midlothian. This increase in house prices has resulted in an affordability issue for many households looking to enter owner occupation. In turn, this places an increasing demand on social rented housing. In order to address this issue the Council is embarking, in partnership with local RSLs, on a programme of building new houses and plans to construct 816 new socially rented homes by 2012.

3.12 The table below gives more information on Midlothian Council's housing.

Key facts	2004/05	2005/06	2006/07
Houses owned	6385	6287	6099
No. of applicants on housing list as at 31 March	3558	2465	3244
Employees	3459	3492	3613
HRA Gross Capital Expenditure (incl. Capital Funded from Revenue (CFRCR))	£4.5m	£8.7m	£13.2m
Total possible rental income	£11,605,181	£12,314,330	£13,046,594
% of Rental income from Housing Benefit (HB)	38.4%	37.3%	39.5%
% of tenants in receipt of HB	29%	28%	29%
% of rent arrears	6.9%	8%	9.5%
Average weekly rent	N/A	£36.25	£38.66
Average rent increase	8%	8%	5%
Houses re-let	242	235	271
Response repairs carried out	24,121	24,144	27,646
Maintenance spend per house incl. cost of service	£188	£242	£243
Right To Buy sales	220	173	156
No. of homeless applications	610	637	655

Sources: Midlothian Council's inspection submission and Scottish Government Statistical Bulletins

4. How well is Midlothian Council delivering housing management?

In this section we set out our assessment of Midlothian Council's performance in delivering its housing management service for tenants.

Grade

Midlothian Council has achieved a **D** grade for housing management. This is a **poor** performance.

- 4.1 Our assessment is that Midlothian Council's housing management service has some strengths, but set against these are significant weaknesses.
- 4.2 The Council has developed a new allocation policy and plans to implement the policy in April 2008. The new policy is based on need and this is positive. However, some of the weaknesses and poor practice in the existing policy will transfer to the new policy. The Council has carried out limited assessment of the impact of the new policy and cannot demonstrate the new policy will allow it to meet its obligations to give reasonable preference to applicants in housing need.
- 4.3 We found some strengths in the service. These include:
- it provides useful information through the information pack for new tenants and its education programme on antisocial behaviour;
 - its neighbourhoods are generally good; and
 - it is taking steps to improve its management of rent arrears and this is beginning to have an impact.
- 4.4 We found some weaknesses that directly affect tenants and service users. These include:
- it provides poor access to its housing list;
 - it provides limited choice and its approach to cancelling and suspending applications is poor;
 - it does not monitor how it manages its list and does not know the outcomes of its lettings or if it is giving reasonable preference to those in housing need;
 - its performance in managing arrears has been deteriorating over the period 2004/05 – 2006/07; and

- its rent loss due to empty houses is increasing.

Tenant satisfaction

4.5 The Council has not undertaken a comprehensive satisfaction survey of all its tenants. However at the start of 2008 it carried out surveys on the rent service and on tenant participation. It has recently introduced service-specific satisfaction questionnaires for lettings and conducts telephone surveys for estate management services. At the time of our inspection it was too early to have results from these surveys.

Access to housing

4.6 The council promotes access to its service in a limited number of ways. It has only one office which is in the centre of Dalkeith and it publishes information about the housing service on its website.

4.7 The Council does not publish the rules it uses to allocate its houses, as it is required to do so by law. It does provide a summarised guide for people applying for its houses, as well as guidance notes to help them complete the application form. We found that these guides are difficult to understand and contain out of date and inaccurate information. Nor do they explain how or when the Council processes applications, how it prioritises applications or how people can get advice or assistance. The Council accepted these weaknesses during the inspection and told us that it intends to tackle these issues as it develops guidance for the new allocations policy.

4.8 The Council has a web based housing options guide for applicants. Through this it aims to help customers get a range of information on housing options in Midlothian and it provides a useful link to Shelter's on line advice service.

However, some weaknesses limit its usefulness:

- it is not written in plain English;
- the information is not up to date, and in places is contradictory; and
- there is limited information about housing association and private sector housing in Midlothian.

4.9 The Council states that its housing list is open to everyone over 16. However some of the information it currently publishes may have the effect of deterring prospective applicants from applying. We also saw that the Council accepts joint applications from siblings, spouses and couples who have lived together for a year only. This is unlawful and discriminatory.

4.10 At 31 March 2007 the Council had 3,244 applicants on its housing lists. This had increased to 4,064 by the time of our inspection.

4.11 The Council currently holds three main housing lists, as follows:

- priority needs - for applicants it assesses as unintentionally homeless and in priority need;
- needs - for those applicants with no permanent accommodation; and
- transfer - tenants of councils or RSLs, private rented tenants with assured tenancies and owner-occupiers.

It ranks applications on the priority needs and needs list primarily in date order – although it gives additional priority to those it assesses as having a medical need. The Council holds transfer applications according to a priority group system ranked in date order. It also has separate lists for people who want sheltered and amenity housing, and deferred lists for people who currently are in the armed forces or live in tied accommodation.

4.12 The Council is not actively working to establish a common housing register (CHR) in Midlothian, nor does it have a clear policy on how it will maximise access to social housing in Midlothian in the absence of a CHR. Following initial discussions with the two main housing associations in Midlothian it developed a common application form and anticipates that it will be in use by all parties by April 2008. However at the time of inspection the Council had not developed firm protocols with the housing associations about how they will share forms and applicants' information.

4.13 The Council does not have a target timescale for adding applications to its list, nor does it routinely monitor how long it takes it to do this, although it has plans to do this as part of its local performance indicators. The Council told us that in 2006/07 it had taken an average of 51 days to add applications to the list, but that this

reduced to 13 days by the end of the first quarter of 2007/08. In our sample of applications received since April 2007 we found that it took an average of 17 days to add applicants to its lists.

- 4.14 The Council waits until applicants submit all the evidence it requires to support their application before adding applicants to the list. We saw that not all the information the Council requests is essential to allow the council to assess the application and that it does not always take account of the difficulties the applicant may have in providing it. We also saw that the Council did not backdate the date of application once the applicant provided the information. This causes delays in applicants gaining access to the list and on how long they have to wait for housing.
- 4.15 After the Council assesses an application it writes to the applicant telling them what list it has placed them on. It also gives contact details of the officer who assessed the application and advises of their right to appeal. Although the Council currently tells applicants their position on the list when they ask, it does not routinely offer prospect interviews to applicants to help them understand how quickly they are likely to be offered a house. The Council is currently working to improve the information available to applicants and intends to produce a bi-annual newsletter for applicants with details of turnover, demand and stock availability.
- 4.16 The Council does not regularly review its housing list. It last reviewed the three main lists in 2006, but the Council has never comprehensively reviewed the sheltered, amenity, tied and armed forces lists. The Council intends to have a rolling review of applications at the anniversary of their application date under its new allocation policy.
- 4.17 The Council provides only limited choice to applicants. Under its current policy it gives priority needs applicants no choice of area or house type and needs and transfer applicants a choice of only one of its 22 letting areas. This impacts on the length of time that applicants in need have to wait for a house, and we saw examples of the Council taking years to house people in urgent need. Nor can applicants omit particular estates or streets or choose a particular house type. The Council's new policy will allow applicants to choose all lettings areas, but not

house types or parts of a letting area. This is a significant weakness as the Council plans to suspend applicants after two refusals and cancel after three.

- 4.18 The Housing (Scotland) Act 1987 prohibits landlords from taking into account the length of time a person has resided in their area when making decisions on the allocation of their houses. We saw that the Council requires applicants to have lived in Midlothian for five years to qualify for priority on its tied list.
- 4.19 The Council cancelled 562 applications in 2006/07 and 505 until end December 2007. We found that it cancels applications for reasons beyond those permitted by law, including where an applicant refuses two offers of accommodation, buys their house through Right to Buy or accepts an offer of a house from another landlord. This is a significant weakness. During the inspection the Council made some changes to its procedures and it now writes to tenants who make a RTB application or who obtain a house from another landlord before cancelling the application.
- 4.20 The Council manages the process of suspending applicants from receiving offers well. It informs applicants of the reasons for suspension, the length of suspension and their right of appeal, and its staff regularly review suspended applications. However its policy on suspensions is restrictive. It currently suspends applicants after one refused offer of housing and under its new policy it will suspend for 12 months after two refusals. We also saw that the Council did not allow applicants to request a suspension if they do not want to move.
- 4.21 Since May 2006 the Council has not allocated houses to applicants with current or former tenancy arrears where they have maintained repayment agreements for at least three months. Its tenants handbook states that the Council requires applicants to pay off any debts before it will offer a permanent tenancy. This approach is not in line with the Housing (Scotland) Act 2001. The Council does not know how many applicants it bypasses in this way.
- 4.22 We also saw that the Council does not consider individual's circumstances when it bypasses applicants with arrears, even when they are in severe housing need or the arrears are because of housing benefit overpayments. We saw that the Council was intending to continue this practice when it implements its new policy,

but during the inspection it changed its procedure to allow staff to take the level of housing need into account before making a decision to bypass.

- 4.23 The Council collects information on the ethnicity of those who are applying to it for a house but has incomplete information about the ethnicity of applicants who have been offered a house. It does not currently monitor applications or lets to either gypsy travellers or people with disabilities, although it has plans to do so.
- 4.24 In summary the Council provides poor access to its housing list. It has made limited progress in working with partners to maximise access and has weaknesses that impact directly on applicants' prospects of re-housing. It gives applicants limited and inaccurate information about how it lets its houses and little information on their housing prospects. It provides limited choice to applicants, has a poor approach to cancelling and suspending applications and does not effectively monitor how it manages its housing lists. The Council is planning to continue in its new policy a number of the practices we identify as poor.

Lettings

- 4.25 We saw that the Council makes allocations in accordance with the Council's allocation policy and maintains good audit trails for its decisions. Its lettings team assesses housing applications and the team leader checks all allocations it makes. All the allocations we reviewed showed the team allocated houses in accordance with the Council's policy.
- 4.26 The Council's current allocation policy does not give sufficient priority to applicants in the statutory reasonable preference categories. It is aware that waiting time has a disproportionate impact on its lettings outcomes, with many applicants in most need choosing to be housed in areas of high turnover. The Council made a decision in June 2006 to develop a needs based policy and at the time of our inspection was preparing to implement the new policy in April 2008.
- 4.27 The Council set targets for lets to each of its lists in March 2004. It has not revised these to take account of the increasing numbers of people it assesses as homeless and in priority need. It aims to let 40% of its properties to the priority needs or homeless list 40% to the needs list and 20% to the transfer list. During the inspection the Council told us that it had not been monitoring its performance

against its target correctly. Its revised figures show that: the Council let 40% to the priority needs or homeless list in 2006/07 and at December 2007 it had achieved 39%; it achieved 39% of lets to the needs list in 2006/07 and 33% to December 2007; and it achieved 21% of lets to the transfer list in 2006/07 and 28% to December 2007.

- 4.28 Beyond these broad targets, the Council does not routinely monitor or report on how it manages its housing lists or on the outcomes of its allocation policy. This is a significant weakness.
- 4.29 Through its transfer-led local lettings initiative for the first phase of its new build programme, the Council aimed to let all 27 properties to existing Council tenants. Its aim was to promote community stability while maximising the number of properties available for let. The Council's allocation policy does not provide for local letting initiatives and it did not provide information to applicants on how it was letting these properties.
- 4.30 The Council did not robustly analyse need and demand for these houses before it adopted the local lettings initiative. It was unable to allocate 7 of the 16 flats in this phase to transfer applicants because of limited demand for this house type. The Council then allocated these houses to applicants from the priority needs and needs lists. It let all of the 20 of its houses that became empty as a result of it letting the new houses to existing tenants to people in need, with 65% to priority needs applicants. The Council has not evaluated or report on the outcomes of this initiative. During the inspection the Council told us it will carry out a need and demand assessment for all future phases of new build homes.
- 4.31 The Council's new allocation policy will be transfer-led in that it will offer all empty houses initially to transfer applicants and the subsequent empty houses to applicants on the needs list. The Council's aim is to increase the level of houses becoming available to let and for this to help it tackle homelessness. It has built in a six month review of the new policy. However, we saw weaknesses in how the Council has developed this policy which may limit its success and put service performance at risk. We saw limited evidence that the Council had:
- analysed the impact of need and demand on this approach;

- explored alternative ways to allocate its houses;
- assessed the impact of this approach on the turnover of its houses or refusal rates;
- analysed the effect on its ability to meet its statutory obligations; and
- considered how it will monitor and review the outcomes of the policy.

4.32 The Council has nomination agreements with the main RSLs that operate in Midlothian. In 2006/07 the Council made 83 nominations to RSLs. In the period April 2007 to January 2008 that number had fallen to 46. Also the number of nominees successfully re-housed by RSLs had decreased from 80% to 74%. Landlords can use nominations to increase housing options for applicants. However Midlothian only nominates applicants for housing in their one area of choice although they may have indicated interest in being housed by RSLs in other areas. This is restrictive.

4.33 In summary, the Council does only limited monitoring of the outcomes of its lettings processes. It has not reviewed its target for lets to homeless people for over three years and is now letting a decreasing percentage of its properties to homeless people. It is not using nominations as effectively as possible to meet need and maximise choice. The Council has developed a new transfer-led policy that will prioritise applicants on the basis of need, but it did so with little analysis of the likely impact.

Tenancies and neighbourhood management

4.34 The provision of good information and access to support are important ways in which a landlord can help to manage and sustain tenancies. The Council produces a wide range of leaflets and has recently produced a tenants handbook. However, we saw that the Council:

- does not regularly review and update the contents of these documents;
- was displaying out of date leaflets in its office in Dalkeith at the time of our inspection; and
- has not kept its tenants handbook up to date.

4.35 Our tenant assessors found that the Council's website was good and provided many useful links to other sites. However, they saw that the font size could not be

enlarged and that information was in English only. They also noted that there is no service access information for people who may be homeless. Our tenant assessors also looked at the Council's new allocations application form and guidance booklet that the Council are about to introduce and they found these are written in plain English and are easy to read and complete. However, they think that the use of green text on a green background may cause difficulties for any visually impaired applicants.

- 4.36 The Council gives all new tenants a useful pack of information that includes its tenants handbook and other leaflets. It does its tenancy sign ups with new tenants at their new home, although we saw that this made it difficult for officers to go through all the information in the pack. However we saw that the Council does not have a consistent approach to what it covers in sign up interviews. It agreed to take action to address this when we discussed it during the inspection.
- 4.37 Prior to January 2008 the Council did settling in visits when requested by the tenant, and for the period March to December 2007 only 30% of new tenants made such a request. The Council introduced a new procedure in January 2008 and its staff now make arrangements for the settling in visit at the tenancy sign up interviews. This is a positive change although it was too early during the inspection to assess its effectiveness.
- 4.38 The rate at which the council's houses become empty is low and is decreasing. It also has a low and declining rate of abandoned properties. The Council has a clear process for dealing with abandoned tenancies and to secure properties vulnerable to damage, although it does not report on its performance within the Council.
- 4.39 The Council issued 1026 Notices of Proceedings in 2006/07, all but five for rent arrears. Of these, 16 resulted in evictions. In 2007/08 to November, the Council increased the number of court orders it obtained following its adoption of a new policy on using technical evictions in 2006. The Council originally estimated that it would have approximately five such evictions each year. In fact it has obtained 48 court orders in 2007/08 by the date of the inspection and granted 23 new tenancies. We saw that this approach worked for some tenants who are paying

their rent, but in around half of the cases we looked at the tenants had started to accumulate arrears again.

- 4.40 The Antisocial Behaviour etc. (Scotland) Act 2004 places a duty upon local authorities and Chief Constables to prepare a joint antisocial behaviour strategy. The Council has worked with Lothian and Borders Police to develop the Improving Social Behaviour Strategy, which has been in place since March 2006. The Council has a good working relationship with the Police and its partners value the role of the police liaison officer, based in the Council's Antisocial Behaviour Team. Feedback from other organisations in the area, however, indicated that there was some confusion over respective roles and responsibilities in relation to antisocial behaviour. The Council reports that it dealt with 206 antisocial behaviour complaints in 2004/05 and 845 in 2006/07. This is a large increase, but as the Council changed its recording practices during this period it is difficult to directly compare the figures.
- 4.41 The Council splits responsibility for managing antisocial behaviour between the housing section (dealing with neighbour disputes and antisocial behaviour relating to tenancies) and the antisocial behaviour team (dealing with antisocial behaviour in the wider community). The teams work together when cases are being considered for Acceptable Behaviour Contracts (ABCs) and Antisocial Behaviour Orders (ASBOs). The Council has developed clear guidance for staff on the ABC and ASBO process from conducting an interview to agreed protocols for ASBOs.
- 4.42 The Council uses referrals to support and mediation to help it manage antisocial behaviour. The Council has not evicted any tenants for antisocial behaviour in the past three years. It is making limited use of ABCs to deal with antisocial behaviour.
- 4.43 The Council's housing team visit and investigate reports of nuisance and breach of tenancy conditions, and issues diaries to record incidents of nuisance and complaints where appropriate. The Council has a procedural document that details response times for the various categories of complaints investigated by the Estates Management and Antisocial Behaviour teams, but it does not routinely

measure or report performance against these timescales and it does not routinely measure or report its performance against these.

- 4.44 Most of the Councils neighbourhoods we saw are in good condition with little litter, graffiti or vandalism. The Council has a mainly reactive approach to estate management. It does not carry out regular inspections or estates walkabouts with the registered tenants organisation (RTO), although it has plans to introduce these. The Council has developed some new procedures in relation to maintaining the environment within its estates, but at the time of our inspection, the Council had not implemented all of these procedures.
- 4.45 The Council established the Gorebridge Community Warden service, through which it aims to reduce antisocial behaviour, improve the environment and develop a sense of pride in the community. The Council's feedback from residents shows that they feel that antisocial behaviour in the area has reduced and that the warden service can make the area safer, but still feel that more can be done to tackle crime in the area.
- 4.46 The Council developed an education programme for schools, initially focused on preventing homelessness, but extended this to include a focus on antisocial behaviour in response to demand from the young people. It developed this with the Police and teachers. The Council and the Police now make joint presentations to pupils in most of Midlothian's secondary schools. The Police recognised the value of the programme and now use it in schools in neighbouring East Lothian.
- 4.47 In summary, Midlothian's neighbourhoods are generally in good condition and the Council has low rates of its houses becoming empty and of abandoned tenancies. However, the Council's approach to estate management is not pro-active. The Council's approach to dealing with antisocial behaviour is fair, but a lack of comparable data means that it is not possible to assess its effectiveness. The Council has recognised that it needs to further develop its approach to tenancy and estate management.

Income maximisation

4.48 The Council provides a good range of payment methods. Almost half of its tenants pay by direct debit with the remaining tenants paying with their rent payment card at PayPoint/PayZone locations and Post Offices. Midlothian also provides a cash collection facility at its only public housing office in Dalkeith.

4.49 The table below summarises the Council's reported performance in collecting rent.

	2004/05		2005/06		2006/07	
	Midlothian	National	Midlothian	National	Midlothian	National
Current tenant arrears as % of net rent due	6.95%	7.4%	8.0%	7.0%	9.5%	6.7%
% of current tenants in serious arrears	6.2%	4.5%	7.3%	4.5%	8.9%	4.4%
Total former tenant arrears (£)	272,290	n/a	280,706	n/a	302,095	n/a
Rent arrears written off (£)	4,306	n/a	94,125	n/a	53,427	n/a

Source: Audit Scotland's published performance indicators & the Council's inspection submission

4.50 The Council's reported performance in managing rent arrears is poor in comparison with the Scottish figure, despite it having the third lowest rents of Scottish Councils. Its performance has deteriorated sharply over the last three years, over a period when the national figure has improved. The Council has recognised its poor performance and increased permanent staffing and began to focus on early intervention work. This led to improved performance in the level of its current tenant arrears: by February 2008 current tenant arrears were 8.2% of net rent due, an improvement of 1.3%. The Council's early intervention has reduced the number of tenants with lower level arrears by more than half.

4.51 The Council's serious arrears have increased by 2.7% over the same three year period. In 2006/07, Midlothian's serious arrears were double the national figure. The Council focused on these cases during the last year and over half of its reduction in arrears during this period was in this category.

- 4.52 In 2006, the Council approved a policy of technical evictions where it could recover the full amount of the debt before entering into a new Scottish Secure Tenancy with the tenant. This policy has successfully contributed to its reduction in the value of serious arrears. However we saw that in some of these cases, the tenants' arrears began to accrue quickly in their new tenancies. Although the Council was closely monitoring these and took early action in response we saw little evidence of it working to prevent these tenants getting back into arrears.
- 4.53 The Council has an increasing level of former tenant arrears. The Council has outsourced recovery of former tenant arrears to a collection agency. We saw that the Council and its agent work together to ensure that they consider all options for recovery before debt is considered for write off. The Council told us that write-off in 2007/08 will be almost double the previous year's figure.
- 4.54 The Council's increasing use of early intervention is positive but we saw some inconsistency and weaknesses in its approach to managing arrears:
- its standard letters are not in plain English;
 - limited evidence that it fully assesses tenants' financial circumstances before agreeing repayment arrangements;
 - delays in consulting with support agencies leading to delays in arrears actions; and
 - although it aims to offer support in all cases we saw it does not always achieve this.

4.55 The table below summarises the Council's reported performance in letting houses that have become empty.

	2005/06		2006/07		2007/08*
	Midlothian	National	Midlothian	National	Midlothian*
Turnover (no. of new vacancies as % of total dwellings)	3.8%	9.5%	3.3%	9.7%	2.6%
Total no. of re-lets	233	-	202	-	154
% of dwellings that were not low demand re-let with 4 weeks	30%	44.2%	30.2%	47.7%	9.1%
Average time (days) to re-let houses that are not low demand	41	64	44	51	59
% of total annual rental due lost due to empty houses	0.8%	2.3%	1.3%	1.9%	2.1%

Source: Audit Scotland's published performance indicators and the Council's inspection submission

* March 2008 figures not yet reported or validated

4.56 The rate at which the Council's houses become empty is low and is decreasing, while the national figure has increased slightly from 2005/06 to 2006/07. The number of houses the Council let has decreased over the two years, and faster than the national figure, while the total number of houses it owns reduced at around the same rate as the Scottish figure.

4.57 The Council lost 1.3% of its total rental income due to empty houses in 2006/07, up 0.5% on the previous year. Over the same period the national figure reduced. The average time the Council took to let its empty houses increased significantly over the two years while the national figure has reduced.

4.58 The Council told us that the increase in the average time that houses are empty is due to:

- its introduction of a new letting standard (although the decline in void performance started before this initiative);
- its policy of bringing forward modernisation works when a house is empty; and
- the impact of bringing houses it bought on the open market to use as temporary accommodation up to Midlothian's standard.

4.59 The Council recognises weaknesses in its performance and is trying to address this through the work of a empty house performance group that involves senior

officers who meet regularly to discuss performance and propose solutions. The group has reviewed the need to carry out full modernisation in all empty houses, but has not yet changed the Councils re-let standard. As a result not all the properties we saw during the inspection met this standard.

4.60 In summary, the Council is responding to the increasing levels of current tenant arrears as its performance figures for 2007/08 show improvements across all categories of current tenant arrears. The Council is pursuing a positive policy of early intervention in arrears although we found some weaknesses in its management of arrears. The Councils performance in managing empty houses is declining.

5. How well is Midlothian Council managing its assets and delivering repairs?

In this section we set out our assessment of Midlothian Council's performance in managing its housing assets and in delivering a repairs service for tenants.

Grade

Midlothian Council has achieved a **B** grade for asset management and repairs. This is a **good** performance.

- 5.1 Our assessment is that Midlothian Council's performance in managing its housing assets and delivering its repairs has a number of strengths but also some weaknesses. It had planned to carry out a comprehensive review of its repairs and maintenance service, and was beginning this exercise at the end of the on site phase of our inspection. The Council has an excellent awareness of its strengths and weaknesses. The Council has a strong recent track record of improvement and has a clear commitment to further improvement and this is a key factor in arriving at the inspection grade.
- 5.2 The Council's houses are generally in a good condition and it has a number of strengths in its service:
- it is developing full information on its stock and has made good progress developing its strategies;
 - it is making excellent progress with its capital improvement programme, its tenant satisfaction levels are high and it is confident it will be able to deliver the Scottish Housing Quality Standard (SHQS) for all of its houses by 2015;
 - its new house-building programme is well planned and the new houses are developed to a good standard ;
 - it has an excellent approach to the management of asbestos; and
 - it meets its statutory duties for Right to Repair.
- 5.3 We also found a number of weaknesses. The Council:
- is not meeting its targets for completing non-emergency repairs;
 - is not yet effectively monitoring the quality of repairs it carries out; and

- is not able to demonstrate that its in-house repairs service provides value for money.

Tenant satisfaction

- 5.4 The Council's repairs satisfaction survey results show good and improving levels of satisfaction with the repairs service. Its analysis shows that at the time of inspection, 90.6% of tenants surveyed were either satisfied or very satisfied with the overall repairs service they received. This has improved from 87.3% for the year 2006/07. 92.8% of tenants in the year to the date of our inspection stated that the Council had carried out their repair to a high standard.
- 5.5 The Council seeks tenant feedback on its delivery of investment work to its houses, and tenant satisfaction is central to the Council's assessment of its own performance in delivering housing investment. The Council is attaining high levels of satisfaction in key elements of its investment programme such as central heating and kitchen replacements. In the year to date 97.5% of tenants receiving a new kitchen expressed overall satisfaction with the work.

Asset management strategy and planning

- 5.6 The Council has a good approach to planning for investment and development of its housing assets. It outlines its strategic objectives in its Local Housing Strategy (LHS) and in its annual Divisional Plans. Key objectives for the Council include the delivery of more affordable housing in Midlothian through direct provision of new build housing alongside new provision by partner RSLs, and meeting the Scottish Housing Quality Standard (SHQS) by 2015.
- 5.7 The Council has a good understanding of current and future needs and demands for its housing stock. It has no areas of low demand or hard to let housing, and a substantial waiting list for its properties. The Council carried out a housing need analysis in 2005, and it recognised that current and future need and demand outweighed housing supply. In response, the Council considered a range of options for addressing the shortfall in available housing, and determined that it would build 1000 new houses across the area. The Council is taking a positive approach to joint work with partner RSLs and other partners to identify and develop sites for additional new housing to meet the remaining shortfall. The Council told us that its new house programme was an important strategic

- response to the Scottish Government's 2012 target to abolish priority need for homeless people.
- 5.8 The Council is developing its understanding of the condition of its existing housing stock, and of the strengths and weaknesses in its stock condition information. Prior to 2007, it based its stock condition information on a sample survey of 10% of the stock carried out in 2001. It reviewed that information in 2005 in preparation of its plans to meet the SHQS. However, the Council recognised it needed to strengthen the quality and range of its stock condition information, and commissioned external surveyors to carry out a full survey of a 25% sample of its stock towards the end of 2007. At the time of our inspection the Council was awaiting results of the survey, and once received it intends to maintain and update the database through Council surveys of the remaining stock over the next four years.
- 5.9 Scottish Ministers have set a target that all social landlords' houses should meet the SHQS by 2015. Landlords were to complete a plan showing how they will achieve this by April 2005. The Council completed its plan within the timescale. Communities Scotland assessed the Council's Standard Delivery Plan (SDP) and found it to be acceptable. The Council is confident that it will meet the SHQS by 2015, and will review its investment plans in spring 2008 when the updated stock condition information is available.
- 5.10 The Council has identified a key strategic aim in providing increased affordable housing in the Midlothian area, and is taking a pragmatic approach in identifying and developing suitable sites for new housing. It is working closely with local landlords and other partners to deliver good quality housing, and with local communities to ensure its plans develop in an inclusive way.
- 5.11 In summary, Midlothian Council has a good approach to the strategic management of its housing assets. It has an understanding of need and demand and is developing a good understanding of the condition of its stock. It has firm plans to improve the way it records its stock condition information and it is confident that it can achieve the SHQS for all its houses by 2015. It has taken a bold step in responding to shortfalls it has identified in housing supply by beginning a substantial new build programme.

New houses

- 5.12 The Council began building the first of its new houses in 2005/06, as a key part of its Local Housing Strategy that identified a shortage of 1,800 affordable houses in Midlothian. The Council worked with a range of local partners to identify current and future levels of housing supply and demand, and looked at possible options to meet the shortage. Following appraisal exercises, the Council agreed that it should directly fund and build 1000 new houses, alongside providing support to other local landlords to build their own new housing to meet the remaining shortage of around 800 units.
- 5.13 The Council's new build plan aims to deliver an increase of around 20% in its stock over five years, at a cost of £110 million. The Council's strong financial position, with low housing debt levels and low rents, places it well to take advantage of the prudential borrowing regime to fund its new housing within achievable financial limits. It is delivering its new build programme through innovative approaches, developing housing on different sites across the region using framework agreements to set out partnership relationships between contractors, suppliers and consultants and the Council. It has assessed the performance of its partners and used this to develop working relationships as the programme progresses.
- 5.14 The Council has set out clear design standards that its new houses must meet, ensuring they are of good quality. These include:
- energy efficiency levels meeting "very good" Eco houses standards with consequential low running costs for tenants;
 - access facilities that meet housing for varying needs standards;
 - secure by design accreditation; and
 - renewable energy production where feasible in particular sites.
- 5.15 The Council's staff and local members visited a range of new build homes owned by other landlords to help develop design ideas and identify current and future key features. The Council then consulted with residents and local communities on its proposals at a series of open meetings.

5.16 The Council is developing its new housing in direct response to identified needs in Midlothian, and has taken innovative and positive steps to meet them. It is taking a good approach to working with partners and local communities to ensure it can deliver on its plans.

Investment & home safety

5.17 The Council's capital spending of £2164 per house in 2006/07 was significantly higher than the national figure of £1,402. This level of spending has increased significantly since 2004/05 as the Council's investment programme has gathered pace. Since 2001 it has based its capital plans on its stock condition survey, and focussed its programme on the need to achieve the SHQS by 2015. Its current priorities include heating, kitchens and insulation work. Its stock is generally in a good condition.

5.18 The Council is developing a good tenant focus when delivering its capital programme. It consults with tenants on planned work to their homes. For example, in delivering its current kitchen replacement programme it gives tenants a range of choices on design and materials and the Council can often tailor improvements to suit their needs. Tenants we spoke to were positive about the Council's approach to its capital programme. The Council collects feedback on its kitchen programme and uses outcomes as a key part of its own performance assessment. While the Council is good at involving tenants in improvement plans for their own homes it recognises that it needs to develop its approach to involving tenants in making decisions about its strategic investment priorities.

5.19 The Council manages its programme effectively through specific project teams focused on delivering key elements of the investment programme. Its Commercial Services division analyses progress each month, and reports progress to Council Committees through the quarterly divisional performance report.

5.20 The Council is not meeting its statutory duty on gas safety for a number of its houses. At September 2007, the Council had current gas safety certificates in place for 99.4% of its houses with gas. It did not have a current gas certificate for 37 of its houses. However, from its available information the Council was

unable to determine how many of its houses with gas systems it checked within the required 12 months of the previous check. While we were on site the Council provided updated information on its performance, and this showed that it checked 97% of its houses with gas systems within 12 months. Of the remaining houses, it checked 2% (114) within one month of the due date; 0.2% (13) between one and three months after the due date; and the remainder more than three months after the due date.

5.21 The Council has a clear procedural framework for managing gas safety. An external contractor carries out checks and servicing work, with checks planned for around 10 months after the previous check. The Council has procedures in place to ensure that where its contractor cannot gain access to a property it contacts the tenant speedily and explains the implications of not gaining access. The Council acknowledged that it needs to strengthen its approach to directing and monitoring its contractor to ensure that as a landlord the Council has full control of the gas safety process.

5.22 From May 2004, social landlords have had a statutory duty to manage asbestos in the common areas of their properties, and to produce an asbestos management plan. The Council has an excellent approach to asbestos. It surveyed its properties for asbestos in 2001, and its recently completed stock condition survey included checks for asbestos. The Council has had an asbestos management plan and procedures in place since 1998 covering housing and non-domestic properties, and plans to review these. We also saw that the Council:

- maintains an asbestos register for its houses and advises contractors where asbestos is present before starting work;
- ensures its own maintenance staff receive asbestos awareness training; and
- provides tenants with guidance on safety precautions, for example through the tenants handbook.

5.23 The Council developed a detailed and comprehensive relet standard for empty houses in 2007, in consultation with tenants. Tenants and applicants are given a copy when viewing a house. The Council has begun developing a system to collect tenant satisfaction information on its relet properties, but does not yet

have this in place. The Council told us it was not aware of applicants refusing any offers of housing because of their condition.

5.24 The Council has a target of completing repairs in all of its empty houses within 20 working days, regardless of the extent of repairs required. It recognises it is not meeting its own target, and attributes this performance to its policy of carrying out programmed investment in houses as they become empty. The Council told us that in December 2007 only 10 out of 34 properties met its target for letting empty houses. This approach enables the Council to bring empty houses up to its current standards without disruption to tenants, but its policy of having a single repairs target means it is difficult to meet this for all empty houses.

5.25 In summary, Midlothian Council's performance in investment and home safety is good. Its approach to delivering its investment programme is robust and well managed. It has a good tenant focus in delivering improvements to tenants homes. And it is meeting its statutory responsibilities relating to the management of asbestos. The Council is aware where it needs to strengthen its approach to gas safety.

Response repairs

5.26 The Council's repairs service is accessible. Tenants can report repairs to the Council's Contact Centre during office opening hours, and can contact the Council's out of hours contact centre (MIDCON) using the same number. Tenants can also report repairs at Council offices, in writing or by e-mail. The Council monitors the use of the different methods available to report repairs, and in 2007 began weekly surveys of tenant satisfaction with the repairs service. In the year 2007/08 to date, overall 90.6% of tenants were positive about the service they received, compared with 87.3% in 2006/07. The Council does not ask tenants about the accessibility of the service.

5.27 The Council gives tenants information on the repairs service in the tenants handbook, tenants newsletters and on its website. The Council recognises that it does not provide a direct way for reporting repairs through the website, and is monitoring use of emails to report repairs.

5.28 The Council does not currently offer tenants appointments for repairs. However it has plans to do this following the forthcoming review of the repairs and maintenance service. Its tenant satisfaction survey shows that in the current year to date 98.6% of tenants surveyed said that their repairs were carried out at a convenient time, and 94.1% said that the repair was carried out within a satisfactory timescale.

5.29 The Council's targets for completing repairs are 24 hours for Priority 1 repairs, 7 working days for Priority 2 repairs, 21 working days for Priority 3 repairs, and 35 working days for Priority 4 repairs. Its target for emergencies is similar to that used by most other local authorities. Its target for Priority 4 repairs applies mainly to certain types of programmed work, and the Council is aware that its approach to categorising these types of repair has a negative effect on its reported performance. The table below summarises the Council's reported performance in completing response repairs within its target timescales.

	Target response time				
		2004/5	2005/6	2006/7	National 2006/7
Priority 1	24 hours	78.6%	91.2%	94.0%	94.1%
Priority 2	7 working days	65.8%	82.8%	81.3%	87.9%
Priority 3	21 working days	63.5%	81.5%	77.8%	89.1%
Priority 4	35 working days	74.5%	83.3%	89.0%	85.1%
% of repairs due to be completed within 24 hours completed in target		78.6%	91.2%	94.0%	89.4%
% of all repairs completed in target		71.9%	86.0%	87.3%	93.9%

Source: Audit Scotland's published performance indicators & the Council's inspection submission

5.30 The Council's performance in completing repairs against its 24 hour target has been improving and in 2006/07 was at the national figure. It has significantly improved its performance in Priority 2 repairs since 2004/05, its performance in Priority 3 repairs deteriorated after a marked improvement in 2005/06, and it has improved performance in Priority 4 repairs to above the national figure in 2006/07. Overall in terms of non-emergency repairs, the Council is not meeting targets for a significant proportion of these repairs.

5.31 We found some weaknesses in the way the Council calculates its repairs performance. The Council uses its Customer Relationship Management system

- to record and monitor repairs requests, but it does not link directly with TASK - the Councils repairs system. Staff must enter duplicate repairs records across the systems and this can lead to mistakes where it does not record repairs on both systems. The Council is also unable to accurately monitor or report on the external contractors' performance on an ongoing basis because of delays in receiving invoices for completed repairs. However, the Council carries out reviews of external contractor work at the end of each financial year to ensure its annual reported performance is accurate.
- 5.32 When tenants report a repair the Council does not give them a record of their repair, instead it advises tenants verbally of the repair timescale and reference details. This is not always an appropriate method and reduces the level of clarity for tenants about the standard of repairs service they can expect to receive. The Council acknowledged this weakness during our inspection and will review its approach as part of its planned repairs service review.
- 5.33 The Council operates a Right to Repair (RTR) scheme that fully complies with its statutory duties. It publicises the scheme in a leaflet and in the tenants' handbook, and advises tenants when reporting a qualifying repair about their rights and details of the scheme. However the Council was not providing tenants with their RTR prior to July 2007, and had not paid tenants any compensation under the scheme. We found that the Council identifies qualifying repairs under the RTR scheme correctly, and had paid a total of £75 in compensation under the scheme since September 2007.
- 5.34 Pre and post inspections are important ways of ensuring that landlords carry out repairs to a high standard and targeted them accurately. The Council's policy is to limit pre inspections and focus on quickly carrying out the repair. It does not have a target in place for the proportion of repairs that must receive a pre inspection, and does not monitor the types of work that receive pre inspections. The Council recognised that historically it did not use post inspections robustly to assess the quality of work carried out. It changed its approach during 2006/07 by appointing a member of staff with specific responsibility for carrying out post inspections and developing systems to manage and monitor them. The Council has set a target of post inspecting 10% of all repairs, and in practice this target

covers both housing and non-housing repairs carried out by the Council. However at the time of inspection it was only achieving around 50% of its own target, and the Council is aware that it needs to strengthen and develop its use of post inspections in monitoring the quality of the repairs service.

- 5.35 In summary, Midlothian Council provides a fair response repairs service. The service is accessible, a significant majority of tenants are satisfied with the service they receive, and the Council's performance in completing response repairs on time is generally improving. However, the Council is not meeting its targets, particularly for non-emergency repairs, and there are some weaknesses in its performance monitoring and reporting systems that reduce its ability to accurately assess the quality of the repairs service. The Council is aware of the areas it needs to improve upon, and aims to address these through its planned repairs service review.

Value for money in procurement

- 5.36 Midlothian Council's budgeted resources for 2007/08 for repairs and maintenance spend per house were £799. This compares with a Scottish average of £1,026 per house.
- 5.37 The Council splits its maintenance and repairs work between its in-house contractor, the Building Maintenance Service (BMS), and external contractors. The charges BMS makes for repairs are based on a schedule of rates originally agreed in 1997, and updated annually to reflect wage inflation, with materials charged at cost. The Council has not reviewed the schedule or formally benchmarked the rates since it was originally agreed. This is a weakness although it plans to review the schedule as part of the planned repairs service review during 2008.
- 5.38 The Council procures services for planned/capital works from external contractors where the BMS is not able to offer a competitive service or where specialist services are required. Historically the Council has used traditional procurement methods for most of its maintenance and improvement work, but in the last two to three years it has adopted modern procurement practices for a number of major contracts, including supplies of kitchen and sanitary ware units

and external doors. The Council decided to link the supply of kitchen and sanitary units for both existing stock and its new build properties, and it is now benefiting from economies of scale and will benefit from simpler future maintenance and replacement arrangements. We saw examples where the Council has used cost and quality criteria to assess the value for money offered by competing contractors, and it has strengthened its approach to monitoring and managing contracts to deliver improved performance from both internal and external contractors.

- 5.39 The Council has set out clear design standards that its new houses must meet, ensuring they are of good quality.
- 5.40 The Council monitors the number and value of repairs orders that it changes, but the way it records repairs weakens its monitoring. The Council's own performance information shows that since 2004/05 it has varied around one third of repairs in some way. This performance can be explained to some extent by the way the Council records repairs on its TASK system, where external term based contract repairs need to be recorded with a cost attached but will not be charged separately outwith the agreed contract price. This practice is necessary to maintain the TASK system but results in additional variations. But because of this the information the Council has on changed works orders is weaker and this does not allow it to accurately assess the impact of variations.
- 5.41 In summary, Midlothian Council's performance in ensuring value for money is procurement is fair. Its spending on maintenance and repairs across its housing stock is low compared to the national average, but this reflects the generally good condition of its stock and its increased spending on investment in its houses. The Council is taking a positive approach to adopting modern procurement practices, balancing corporate commitments to maintaining direct employment of maintenance services with the need to ensure it maximises the value for money it gets in procuring maintenance and investment work. It has not formally compared the value for money provided by its in-house BMS with external alternatives, but has plans to review the schedule of rates BMS bases its charges upon.

6. How well is Midlothian Council delivering services for homeless people?

In this section we set out our assessment of the Council's performance in delivering services for homeless people.

Grade

Midlothian Council has achieved a **D** grade for services to homeless people. This is a **poor** performance.

- 6.1 Our overall assessment is that Midlothian Council's homelessness service has some strengths, but many weaknesses, some of which are significant. Some of these weaknesses impact directly on the quality of services to people who are in housing need. We also found weaknesses in the management of the service that may have an impact on its ability to improve.
- 6.2 Midlothian has some strengths in the way that it delivers its homelessness service. The Council's duty system means that homeless people do not have to wait long to speak to a homelessness officer. It has introduced some initiatives to reduce the reliance on bed and breakfast accommodation (B&Bs). It is doing some positive work on prevention through the Mental Health Development worker and the housing education and awareness project.
- 6.3 However, there are also major areas of weakness where the service needs to be improved. These include:
- the Council's approach creates a number of barriers to people applying for assistance;
 - its service can be difficult to access outside office hours;
 - it incorrectly cancels a significant number of homelessness applications;
 - its recording and reporting of key statistical information relating to the homelessness service is not reliable;
 - it cannot demonstrate that it is properly assessing applications from homeless people or that it always meets its responsibilities to them;
 - it does not meet the requirements on the types of advice and assistance it should be offering to homeless people;

- its approach to allocating permanent accommodation results in long stays in temporary accommodation including B&Bs; and
 - it has breaches of the Unsuitable Accommodation Order.
- 6.4 There are also significant gaps and weaknesses in relation to leadership and performance management within the homelessness service.

Access to service

- 6.5 Midlothian Council received 800 applications for assistance from homeless people in 2006/07. This means that 1.4% of all households in Midlothian made a homelessness application last year, compared to 2.5% nationally. The Council reported a lower number of applications to the Scottish Government than the true figure of 800; it told us this was due to technical problems with its ICT system.
- 6.6 The Council delivers its homelessness service from a centralised homelessness team based in Dalkieth. The Council's office is in a convenient town centre location. At the time of our inspection, the Council did not give people applying for assistance the option of having a homelessness assessment interview in other locations. The Council advised us it will provide homelessness assessments interviews in other locations for people with specific needs.
- 6.7 The Council operates a duty system and interviews most applicants on the day they first approach the service. This is a good approach. We found the Council closed its office for two hours at lunchtime. However, following feedback during the inspection the Council no longer closes the office at lunchtime. The Council does not monitor the uptake of appointments it makes for homeless people and does not know the number of people that it loses contact with prior to their assessment interview.
- 6.8 The Council requires people applying for assistance to approach the main housing reception and does not allow them to present directly to the homelessness service reception. We saw that people had to divulge personal information in the public reception area and had to wait longer than necessary, as they had to go through two reception processes. During the inspection the

Council introduced new reception procedures however the lack of direct access remains an issue.

- 6.9 The Council is developing its approach to the production and distribution of publicity material for the homelessness service. Its leaflets for the service include some useful information and it can make these available in alternative formats and other languages. However, one of its leaflets does not give the address of the homelessness service or the office opening hours. It also includes an extensive list of information the Council requires applicants to provide, not all of which is needed for a homelessness assessment. This may discourage some applicants from approaching the service.
- 6.10 The Council recently distributed several leaflets on homelessness and its services. However, we visited a number of places where homeless people may present and found no homelessness publicity information on display. The Council does not monitor if its publicity material is on display in different locations, including at partner organisations, and has no process to keep the stock of publicity material replenished. The Council told us that it aims to tackle this weakness.
- 6.11 The Council does not prominently display the out-of-hours number outside the homelessness office or in other locations where homeless people are likely to see it. We spoke to people who had become homeless out of hours and they told us that they did not know how to contact the Council's homelessness service.
- 6.12 The Council has recently produced an Information and Advice Strategy and its Information and Advice Officer has done some good work; particularly around awareness raising with young people.
- 6.13 The Council's website includes some useful information on homelessness, but:
- it incorrectly tells people that they have to meet all four statutory criteria before they are "deemed homeless";
 - it does not accurately set out the circumstances in which the Council has a duty to provide temporary accommodation;
 - the e-mail contact for the homelessness service does not work; and

- it includes statements that may discourage applications for assistance.

In response to our feedback during the inspection the Council acted quickly to ensure that its website includes its homelessness out of hours number.

6.14 The Council provides a worker to help people with mental health problems to get access to its services when they are about to be discharged from hospital. This is positive, although the Council does not currently monitor referrals to the service. The Council does not currently have a similar service for other patients leaving hospital, although a range of partners are drafting a Lothian-wide hospital discharge protocol.

6.15 The Council recognises that its current homelessness out-of-hours service is not easy to access. We found the following restrictions on access to the service:

- after 11 pm homeless people can access the service only by going to the police station in Dalkeith;
- the Council does not help people with transport to the police station or to temporary accommodation;
- it does not provide a free phone number to contact the service; and
- its duty officers are not always aware what temporary accommodation is available, and we saw instances where they had to call a neighbouring Council's service to get this information.

6.16 The Council does not routinely monitor approaches to its out-of-hours service. During our inspection, the Council could tell us only the number of calls received by its call centre. It did not know how many people required accommodation, how many it had provided with accommodation, the reasons for their presentation, or if they presented to the Council for a homelessness assessment on the next working day. As a result the Council does not know if it is always meeting its duties towards homeless people who present outside of office hours. This is a significant weakness.

6.17 The Council has a duty to make all necessary inquiries and offer appropriate assistance where it believes someone may be homeless or threatened with homelessness. We saw several occasions where the Council did not discharge its duty for people who applied for assistance, including providing advice to help

people prevent potential homelessness. The number of people whom the Council judges to be potentially homeless, who later do become homeless, is more than double the national figure.

6.18 In summary, the Council provides poor access to its homelessness service. The Council does not always discharge its duty to take homelessness applications, access to the service outside of office hours is difficult and aspects of the Council's approach may deter people from seeking assistance.

Advice and prevention

6.19 The Council is still developing its approach to advice and prevention. It set this out in its first homelessness strategy for 2003-08, but did not progress some of the main actions, including:

- protocols for the early identification and referral of people at risk of homelessness, including early notification of possible eviction;
- a multi-agency approach to providing housing advice and information; and
- improved partnership working.

6.20 The Council is taking these forward into the homelessness strategy it is developing for 2008-12 in its housing advice and information strategy and in an improvement plan it drew up for the homelessness service. The Council recognises this is an area of weakness and has created a new post of prevention officer to develop a strategy, build partnership working and provide training and support to staff.

6.21 The level of repeat presentations to the Council increased from 4.4% in 2005/06 to 7.3% in 2006/07, which is below the national figure of 8.6% for 2006/07. The Council's figure had increased to 8.3% by the end of September 2007. The Council has not analysed why this figure has nearly doubled over this period.

6.22 In 2006/07, the Council found 22% of applicants to be non-priority or intentionally homeless. The Council refers such people to its tenancy support service for advice and assistance when it provides them with temporary accommodation for a limited period. We found a number of weaknesses with this:

- it does not assess people's need for this service before referring them;

- it does not record if referrals are taken up, if advice and assistance has been provided, or the outcomes for homeless people; and
- the Council has no arrangements in place for providing advice and assistance to non-priority or intentionally homeless people where it does not provide them with temporary accommodation.

The Council is not always meeting its statutory duty to provide advice and assistance to these people. This is a significant weakness.

- 6.23 The Council recently developed new guidance for homelessness staff on advice and information provision, but had not implemented this at the time of our inspection. It does not promote or publicise how people can access advice and assistance and it provides only limited, generally negative, information about its temporary and permanent accommodation. It has a list of accommodation for non-priority single people but staff told us they do not use this as it was out of date. Following feedback from us during the inspection the Council updated the list. It has not developed a process to get early notification from landlords of evictions.
- 6.24 Last year the Council passed its provision of tenancy support to an external provider, Aspire. During the handover a backlog of around 300 referrals built up, although this has now reduced to 10. The Council had only limited targets and monitoring for this service and did not know its outcomes. It is discussing improvements with Aspire to the recording and monitoring system, and agreeing more targets and measures of success and better outcome information.
- 6.25 The Council has some initiatives in place that aim to prevent homelessness:
- a housing education and awareness programme for young people delivered with the Bridges project and other partners;
 - the Mental Health Development worker, based in the homelessness section, who provides and arranges help and support for people living in their own tenancy or leaving hospital; and
 - Homepoint training for its staff.
- 6.26 The Council reports that 91% of homeless people housed by the Council were still in their tenancies a year later, compared to 94% of tenancies sustained amongst

other people housed by the Council. The Council has not analysed the reasons for this.

6.27 In summary, the Council's approach to advice and prevention is poor. It is not always meeting its statutory duty to provide advice and assistance to homeless people. It has been slow to implement its planned actions and cannot tell if its tenancy support service is effective. Its approach to partnership working is limited. It has some initiatives in place and recognises it needs to improve in this area.

Assessment of homeless people

6.28 The Council has a duty to make all necessary inquiries to satisfy itself whether homeless applicants are homeless or threatened with homelessness, have a priority need, and became homeless or threatened with homelessness intentionally. The table below provides an overview of the Council's assessment decisions for people who apply to it for assistance.

	2005/06		2006/07		2007/08*
	Council	Scotland	Council	Scotland	Council
All applications assessed in period	678	60,058	804	58,663	339
% priority unintentional	68%	52%	71%	52%	69%
% priority intentional	4%	2%	4%	2%	6%
% non-priority	22%	17%	18%	17%	20%
% not homeless	4%	9%	3%	8%	3%
% lost contact/withdrew before assessment	2%	13%	3%	13%	2%
% resolved prior to assessment	0%	7%	0%	7%	0%
Proportion of assessments completed within 28 days	99%	-	99%	-	100%

Source: Scottish Executive Housing Bulletins and the Council's inspection submission

*April to September 2007

6.29 The Council's pattern of reported assessment decisions contrasts with national figures in two main ways: the percentage of people accepted by the Council as being unintentionally homeless and in priority need is significantly higher than the

national figure; and the percentage it loses contact with is significantly lower. However, we found significant weaknesses in the Council's recording of decisions that make these figures unreliable. This is because the Council records an interim decision on its ICT system but fails to amend this decision to reflect the final outcome. Our analysis suggests that it wrongly records at least 25% of its decisions. Nor does it change its interim decisions in a significant number of cases it cancels prior to making an assessment decision. As a result the proportion of unintentionally homeless and in priority need decisions is likely to be much lower than the Council's reported figures, and lost contacts much higher.

- 6.30 The Code of Guidance recommends that councils should notify people of the outcome of their application as quickly as possible, and suggests a target of 28 days. The Council does not routinely monitor the length of time it takes to make a homelessness assessment decision. It told us that this year it made all of its decisions within 28 days. However we found that errors in its recording meant that this figure is incorrect. The Council was unaware of this weakness when we raised it during the inspection, but it made changes to ensure that it now records the correct decision date.
- 6.31 These inaccuracies in the Council's recording of assessments weaken the Council's planning process across the homelessness service, and significantly underestimate the scale of the task for the Council in achieving the 2012 target for abolishing priority need.
- 6.32 These weaknesses also mean that the Council does not know how long it takes to issue assessment decision letters. The Code of Guidance recommends that councils should issue decision letters within one working day of reaching a decision. Staff told us that it often took them several weeks to issue decision letters. This is a weakness.
- 6.33 The Code of Guidance recommends that councils should keep applicants informed of progress with their application. The Council has little contact with applicants after their initial interview and prior to making an assessment decision. It does not routinely contact those it has a duty to house between its assessment

decision and offering permanent accommodation. Staff told us this was due to workload and that they rely on applicants contacting the Council.

6.34 We saw some examples of officers taking a very sensitive, customer-focussed approach during homelessness interviews. However, we saw a number of weaknesses in the Council's approach to interviewing homeless people:

- it does not always give applicants a sufficient opportunity to explain their circumstances;
- it does not advise applicants what to do in an emergency out-of-hours;
- it does not always tell applicants what happens next or how long its assessments are likely to take;
- it does not routinely offer interviews with a member of staff of the same sex; and
- sound proofing in its interview rooms is poor.

6.35 We found that the Council is incorrectly cancelling a large number of homelessness applications because the applicant does not provide it with requested evidence, some of which is not necessary for a homelessness assessment. The Council places the responsibility on applicants to provide evidence, rather than it collecting it. Our analysis suggests that around 25% of applicants have had their case cancelled in this way. This is a significant weakness.

6.36 We found other weaknesses in the quality of the Council's assessment decisions:

- it does not always record enough information on applications to demonstrate the basis for its decisions;
- it does not always follow the correct sequence of inquiries;
- it made inappropriate inquiries in domestic abuse cases; and
- it does not treat applicants as a couple unless they have a joint benefit claim or have been living as a couple for at least 12 months. This is not in line with the Code of Guidance and is potentially discriminatory. We saw it tell one same sex couple that they would not be regarded as a couple for this reason.

6.37 The Council revised its standard decision letters to reflect the Code of Guidance in August 2007. However, at the time of our inspection it was not using these, and we found the following weaknesses with the decision letters it is using:

- they do not always explain why the Council has reached its decisions;
- they do not provide contact details of advice agencies; and
- they say that the Council will provide temporary accommodation for up to 28 days, rather than giving applicants a reasonable opportunity to find their own accommodation.

6.38 In the past, the Council audited a random 10% sample of homelessness applications. It had no quality assurance process in place in the eight months prior to our inspection and told us this was due to staff shortages. During the inspection, the Council re-instated its random 10% audit of all cases.

6.39 The Council has a duty to advise homeless applicants of their statutory right to request a review of its decisions. The Council notifies people of their right to request a review and accepts verbal requests for reviews. We saw that the Council correctly changed decisions where appropriate and it has recently started to record reviews. We also found it takes along time to determine the outcome of some reviews.

6.40 In summary, the Council is poor at assessing homeless applications. It incorrectly cancels a significant number of cases, its recording of assessment dates and decisions is not reliable, and it cannot demonstrate that it is properly assessing applications from homeless people or meeting its responsibilities to them.

Securing accommodation

6.41 Midlothian Council uses a range of temporary accommodation for homeless people:

- bed and breakfast (B&Bs) establishments and hotels;
- a hostel managed by an RSL with support provided by the Council;
- a hostel with shared facilities linked to move-on into supported self-contained studio flats;
- a multiple-occupancy flat;
- 125 self-contained furnished houses, flats and portakabins; and

- 160 furnished and unfurnished private rented properties.
- 6.42 At the time of our inspection, the Council was about to open a new four bed “wet” hostel for people with alcohol dependency and nine bed hostel with shared facilities. It had also purchased a property which is to be developed into a 13 bed shared supported unit for young people.
- 6.43 The Council has increased the supply of other forms of temporary accommodation in its attempt to reduce its reliance on B&Bs. It has a “Spend to Save” initiative under which it buys properties on the open market, usually ex-council or ex-RSL houses to increase its supply of self-contained temporary accommodation. It has also used this scheme to purchase two larger properties for transfer applicants, and in these occasions, it used the vacated houses as homelessness accommodation. It has bought 73 properties under this initiative since 2005. The Council also leases two properties from Melville Housing Association.
- 6.44 The Council uses the private sector to increase its supply of self-contained temporary accommodation particularly in areas of higher demand. During 2007/08 it placed 197 homeless households in private lets. While this is a positive initiative, we found serious weaknesses with this scheme. The Council has no clear criteria for who is eligible for this scheme and it bypasses people in private lets for permanent offers unless the lease is about to expire, thus prolonging their time in temporary accommodation. It does not tell people about this when they take one of these lets. In response to feedback during the inspection the Council introduced a new mandate that includes this information. We also saw that some tenants find the rents unaffordable. The Council is replacing this scheme with a new private sector leasing (PSL) scheme which does not have the problems identified above. It plans to lease at least 30 properties annually over 5 years. Between October 2007, when the PSL scheme started, and January 2008 it leased 11 properties under this scheme and was looking at a further 27 potential properties.
- 6.45 The Council is phasing out its use of a hostel for single homeless people owned by Castle Rock and Edinvar Housing Association because it does not meet

current standards. The hostel will close in March 2008. The Council is moving residents into its new hostel accommodation, or private sector leased properties.

6.46 The table below sets out key figures reported by the Council on its use of temporary accommodation.

	2005-06	2006-07	2007-08
	Council	Council	Council
Number of homeless households provided with temporary hostel accommodation**	43	54	43
Percentage accommodated in temporary hostel accommodation	9.2%	7.8%	5.8%
Average length of stay for homeless households in temporary hostel accommodation (days)	133	190	216
Number accommodated in bed and breakfast accommodation	238	347	387
Percentage accommodated in bed and breakfast accommodation	51%	50%	51.9%
Average length of stay in bed and breakfast accommodation(days)	87	83	103
No. of families with dependent children accommodated in bed and breakfast accommodation	15	30	24
Number accommodated in Council furnished accommodation	67	109	109
Percentage accommodated in Council furnished accommodation	14.4%	15.7%	14.6%
Average length of stay in Council furnished accommodation (days)	143	190	272

Source: the Council provided this information during the inspection it includes full year information for 2007/08

**Figure for households in Council accommodation only

6.47 The Council's use of all forms of temporary accommodation has increased significantly, as have the average stays in each type of accommodation. The Council housed 693 people in temporary accommodation in 2007/08 and this increased to 736 in 2007/08. It places over half the people it has a duty to help in B&Bs. The average length of stay in B&B was 83 days in 2006/07 and increased to 103 days in 2007/08. We found that the Council accommodated some people for between one and two years in B&B. The Council routinely offers homeless people B&Bs in the first instance, irrespective of their age or vulnerability and even when other types of accommodation are available.

6.48 The Council has a shortage of one bedroom size accommodation available either as temporary and permanent accommodation. It has only recently considered

solutions to this, including allowing single people to apply for two bedroom properties in the new allocation policy.

- 6.49 At the time of our inspection, the Council used around 125 furnished or unfurnished properties as temporary accommodation, including its own and leased properties. In 2006/07 the average length of stay in this accommodation was 190 days; this increased to 272 days in 2007/08. In 2006/07 it also had around 180 households in private lets with an average length of stay of 218 days, and this increased to 303 days in 2007/08.
- 6.50 We saw that the Council places many homeless people in more than one type of temporary accommodation before it permanently re-houses them. At the time of the inspection it could not tell us the cumulative time these people spend in temporary accommodation although it is now monitoring this. Nor does it monitor the reasons why people refuse its offers of temporary accommodation. These weaknesses make it difficult for the Council to effectively plan its provision of temporary accommodation.
- 6.51 The Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2004 prohibits councils from using unsuitable accommodation for households with children and pregnant women for longer than 14 days unless exceptional circumstances apply. The Council reported 25 breaches of the Order in 2005/06 and this increased to 33 in 2006/07. It does prioritise households with children and pregnant women it places in unsuitable accommodation for moves to more suitable accommodation, but it does not always achieve this within 14 days. In response to our feedback the Council developed an avoidance procedure but this does not cover how it will manage the move on from B&B to avoid breaches.
- 6.52 The Council places homeless people in B&B accommodation out with its area. In 2006/07 it placed 184 households in B&Bs out with its area and this increased to 227 in 2007/08. It uses B&Bs in Edinburgh regularly, but does not have a protocol with the City of Edinburgh Council to ensure it shares information about placements in the same B & Bs. This is poor practice.

- 6.53 We found some other weaknesses in the Council's use of B&Bs:
- it does not have standards for the B&Bs it uses and some do not meet the standards in the Code of Guidance;
 - it uses a number of B&Bs that do not have an HMO licence; and
 - it does not conduct full and proper risk assessments before placing vulnerable people in bed and breakfast accommodation.

The Council plans to develop a temporary accommodation strategy to deal with these issues.

- 6.54 We saw that some of the Council's furnished properties are of good quality, but it is using portakabins that are damp and difficult to heat. Most of these are on one site. The Council intends to demolish these, but does not have definite plans to deliver this. It does not have temporary accommodation that is suitable for people with particular needs. The satisfaction levels of the residents of the Council's temporary accommodation we spoke to varied according to the quality of the accommodation they were living in.

- 6.55 The Council's accommodation officers visit the Council's self-contained and hostel accommodation. They also aim to visit the bed and breakfast establishments regularly, but achieve only around one visit a month. The Council does not tell residents when they are likely to visit. It does not visit people it places in private rented accommodation.

- 6.56 The Council has produced a leaflet about its temporary accommodation, and it has developed lists of useful contacts and addresses for people in temporary accommodation. However, its leaflet does not explain how it allocates its different types of accommodation and does not include details of its private rented schemes.

- 6.57 The Council does not routinely collect feedback from people who use its temporary accommodation. At the end of 2007, it carried out a limited survey of service users' views as part of developing its homelessness strategy. We gathered the following feedback from service users and other agencies:

- the accommodation did not meet particular needs;
- the accommodation was far from work and social networks;

- the Council did not help households with children placed in B&Bs in Edinburgh with transport costs to schools;
- the high cost of the accommodation;
- the intrusion of daily room inspections in hostels; and
- the lack of cooking facilities in B&Bs.

6.58 The Council is working to replace less suitable accommodation, but it has not assessed the type, size or location of the temporary accommodation it needs and has no overall strategy for how it will meet increasing demand.

6.59 In 2006/07 the Council offered permanent accommodation to only 40% of the people it assessed as having priority need, considerably lower than the national figure of 73% and the second lowest of all Scottish councils.

6.60 The Council takes a long time to offer permanent accommodation to homeless people, although this is partly due to its challenging context. On average, it took 196 days in 2006/07 and 231 days for the period April to September 2007. At the end of March 2007, the Council had 993 cases that it had a duty to house, although it told us that this included a number of duplicates. The Council recognises that the average time it takes to house people will continue to increase and could rise dramatically once it begins to re-house those people who have been waiting a long time for a permanent offer.

6.61 The Council aims to allocate 40% of its lets to homeless applicants. This target is not sufficient given the backlog of cases it has to house and the number of applicants it assesses as unintentionally homeless and in priority need each year. It achieved 40% in 2006/07, and 39% between April 2007 and January 2008. It has not changed its target since 2004 despite the increasing level of homelessness presentations. Single people make up the majority of people waiting to be re-housed. The Council is changing its Allocations Policy to allow single people to apply for either one or two bedroom accommodation, although not both.

6.62 The Council uses nominations and section 5 referrals to secure accommodation for homeless applicants from RSLs and it aims for 40% of its nominations and

section 5 referrals to be of homeless people. The Council made 34 general needs nominations to RSLs between April 2007 and January 2008, and 44% of these were priority needs applicants.

6.63 The Council does not treat homeless applicants in the same way as other applicants when allocating permanent accommodation. It gives homeless people only one offer of housing, where other applicants have two offers before they are suspended from getting offers. We saw that it treats as a discharge of duty an offer of a difficult to let property to a homeless person, but does not penalise other applicants for refusing such offers. The Council does not offer homeless people houses that become empty in ten letting areas with low turnover, this amounts to 10% of its total lets in the current year.

6.64 In summary, the Council does have a challenging context given the demand for social rented houses in Midlothian. It has also stated that its programme of building new houses is aimed at helping it to achieve the 2012 target for the abolition of priority need. However, the significant weaknesses in its management of temporary accommodation and in its poor approach to permanently housing homeless people present major obstacles to it achieving this target.

7. Is the housing service at Midlothian Council managed for improvement?

Leadership and strategic planning

- 7.1 The Council has a clear planning and performance management framework. Its draft Community Plan for 2007-2011 includes a wide range of objectives with targets, although not all of these are SMART. It also produces a Corporate Strategy for the four years of each political administration, and is finalising the strategy for 2007-2011 to align it with the Scottish Government's single outcome agreement. It aims to complete this for the start of April 2008. The Council produces an Annual Plan linked to the strategy and the plan for 2007/08 is available on its website. It supports its plan with high level action plans and it regularly monitors its progress against these. The Council has also approved three year corporate priorities for 2008-2011 linked to its budgets.
- 7.2 The Council has a divisional plan for Corporate Services with a number of objectives for its housing service. It is developing a service plan for the housing service that will take a strategic look at planning and managing the service. The divisional plan for Commercial Services sets out the objectives for asset management and repairs, with clear links to the Local Housing Strategy.
- 7.3 The Council is currently developing a revised homelessness strategy. It is bringing forward some actions it has not achieved from the previous strategy, but it has still to develop plans for delivering these objectives and set measures of success. We found only limited evidence of partnership working at a strategic level. The Council's Corporate Priorities document includes objectives that mirror the Community Plan and includes a positive priority to increase the supply of homelessness accommodation. However we found a lack of focus in the Council's planning on improving the day-to-day service for homeless people.
- 7.4 The Council arranged a mock inspection of its housing service in 2006. The mock inspection raised a wide range of areas for improvement across the housing service, some of which were significant. In response to this it produced a detailed improvement plan for its homelessness service in October 2006, but it did not implement this plan. The Council later developed a new improvement plan

containing some of the objectives from the first plan. However, at the time of our inspection the Council had achieved few of its stated improvement objectives. This is a significant weakness.

- 7.5 During the inspection we found the Council did not have plans in place to meet the targets set by Scottish Ministers to reduce the proportion of homeless people assessed as non-priority by 50% by 2009, and to abolish priority need by 2012. The Council is now proposing to set up a group to look at meeting these targets.

Performance management, planning and reporting

- 7.6 The Council has a detailed performance framework which it plans to roll out across the Council. It plans to provide staff training to support this roll out, covering both the ICT for the framework and practical help on setting indicators. The Council reports performance through Cabinet, the Corporate Management Team and the Performance Review Committee. The Council makes some use of benchmarking but does not routinely compare its performance with relevant peers.
- 7.7 The Council makes little use of performance management and reporting in its housing service. This is a weakness that limits the Council's ability to effectively drive improvement in the service. It is currently drafting a set of local performance indicators and plans to have those for the housing and homelessness services in place by April 2008. During the inspection the Council told us it had loaded the targets on to the Council's performance management system and trained staff to use the targets. However the Council has not consulted staff, tenants or service users on these performance indicators. The Council gives its staff Personal Development Plans (PDPs) and it intends that these will be linked to the new Service Plan as part of the performance framework in housing services.
- 7.8 The Council's Asset Management and Repairs service has a more fully developed performance monitoring framework. The Commercial Services division has developed a range of reporting tools on repairs and maintenance activity, and these enable it to effectively monitor performance at service delivery level and directly feed into corporate reporting. The Council reports performance against national and local performance indicators corporately each quarter. We saw that

service delivery and senior management teams meet regularly to discuss performance.

- 7.9 The Council does not effectively monitor or report on the management of its housing list or the outcomes of its allocation policy. Although it is developing a set of local performance indicators, these will not allow it to fully monitor its allocation policy. It will need to develop a robust monitoring framework to allow it to fully assess the impact of its new transfer led allocation policy and to demonstrate that it is giving reasonable preference to those in the statutory need categories.
- 7.10 At the time of our inspection, the Council was preparing to implement its new allocation policy. It was training front line staff and preparing to send out new forms to all applicants. However, we saw little evidence of it project planning for this major change and no evidence that the Council had taken account of the resource implications of this exercise.

Customer focus and influence

- 7.11 The Council conducts regular Council Services Surveys with its citizens' panel and this provides satisfaction information across a range of services, but the questions included for housing are limited and do not cover the whole service. The Council does not carry out a comprehensive tenant satisfaction survey on a regular basis, and as a result it does not know what tenants think about the service.
- 7.12 The Council has made limited attempts to get feedback from service users about its homelessness service and does not routinely seek service users' views. This is a weakness. In 2007, it started weekly customer satisfaction surveys of tenants reporting repairs. Its new proactive approach led to a large increase in responses from its previous approach which relied on tenants making contact directly or through Councillors.
- 7.13 The Council has developed customer service standards as part of its electronic government strategy (Customer First). The Council recognises that it has not implemented these standards consistently across the Council and that it does not monitor them effectively. The Council also recognises that it is difficult to

measure its achievement of these standards and that they do not cover all relevant areas. It is currently reviewing its customer service standards. In 2007 the Council arranged customer care training for all staff in housing management.

- 7.14 The Council's housing management and homelessness team is currently developing service standards. It has set some of the quantitative performance targets in the draft housing service standards, but we found it has not aligned all of these with other stated Council targets. Its housing service standards include some of the existing Customer First standards, and while many are measurable it will be more difficult for the Council to measure its performance against all of these standards.
- 7.15 The Council publishes information on its framework for public reporting of its performance which includes a helpful timetable. Annually it publishes its performance in the statutory performance indicators on its website together with a comparison with other councils although not with relevant peers. It also publishes its performance information annually in the Midlothian News – the Council's newsletter sent to every household in Midlothian. This is a good approach. However the publication does not include the year on year performance or other comparisons and this limits its effectiveness. The Council makes its quarterly performance reports available on its website; these show its departmental action plans and performance indicator reports. These are helpful, although they do not always show progress against the original targets or provide comparative information in a consistent way. Overall, the Council's approach to public reporting is underdeveloped and relies heavily on its website.
- 7.16 The Housing (Scotland) Act 2001 requires the Council to publish a tenant participation strategy. The Act also requires landlords to inform and consult tenants about changes to its services and take tenants' views into account when making decisions that will affect them. The Council published its first tenant consultation strategy in 2002. The Council encountered some problems in encouraging tenants to engage with it and in developing participation, a number of other landlords in Midlothian told us that it had been challenging to encourage tenant participation in the area. The Council has employed TPAS to help it develop tenant participation in Midlothian.

- 7.17 TPAS has worked with the local Tenants' Forum to deliver two tenant participation conferences and develop a tenant participation newsletter, which the Council sends to all its tenants. Tenants told us they value the Council's staff contributions to the Forum meetings and conferences. The forum became Midlothian's Registered Tenants' Organisation at the beginning of 2007. Working with TPAS, and the Forum the Council has now reviewed its tenant participation strategy and published a revised draft strategy for 2007/10.
- 7.18 The Council sends out a notice of rent increase annually and asks for tenants views. It sends a reply sheet with the letter, but this does not ask specific questions, so it gets relatively unstructured responses from tenants. This year, despite encouraging responses by freepost, telephone and email, the Council received only 63 responses to the rent increase letter (representing about 1% of tenants). Of the responses received, more than half made no comment about the rent increase and only 19 responses expressed support for the increase proposed by the Council.
- 7.19 We found that the Council makes its corporate feedback leaflet readily available in reception areas, on the website and in different formats. This clearly sets out the stages of the complaints process including appeals and information on contacting the Ombudsman. However, we found little information on the level and type of comments or complaints the Council receives about its housing management and homeless service. The Council does monitor the speed of response to complaints but, it does not record or report on the outcomes or use this information to identify potential service improvements. Within asset management and repairs, the Council's Commercial Services team keeps a separate database for complaints made about the maintenance service. It does not directly link this to the corporate complaints system, and so the Council may be under reporting its performance in handling and resolving complaints about repairs.

Equalities and diversity

- 7.20 The Council has a detailed Equalities Policy and Action Plan and effective corporate level monitoring and reporting of its performance in delivering these. However, we found only limited information on housing in the equalities

performance reporting. The Council has recognised that it needs to do more in this area. It is working with partners to get better information on the needs of equalities groups, set priorities for equalities work and develop engagement strategies across Midlothian. The Council is a partner in a study involving authorities across the Lothians, Scottish Borders and Fife that aims to assess the needs of minority ethnic communities.

- 7.21 The Council has guidance on doing Equalities Impact Assessment (EIA) and has provided training for staff. Although it has not completed an EIA for the housing service, it has completed eight EIAs for areas of the housing service and an EIA for the new allocations policy and plans to assess all new policy work in this way.
- 7.22 The Council organised training in equalities for all staff in the housing management and homelessness team and this was on going during the on site period. It plans to evaluate the training and use this to assess future training needs in this area.
- 7.23 The Council's Loud and Clear policy sets out information for staff on aids to communication including alternative formats and languages available. The customer care training in 2007 included translation and Language Line. The Council can make its publications available in other languages and formats although it does not always advertise this service. The Council has access to Language Line, a telephone interpreting service and advertises this in its Dalkeith office. Some of the Council's staff we spoke to were not aware of how to access these services or how to provide information in other formats.
- 7.24 The Council recognises that it does not give its maintenance staff information on the particular needs of tenants to allow them to tailor the service to these needs.

Efficiency and value for money

- 7.25 The Council charges its tenants an average rent of £40.45 significantly below the national figure of £48.19 in 2007/08 and is the third lowest of all Scottish councils. Its loan debt per house is only 48% of the Scottish figure and the 6th lowest in Scotland (in 2006/07). Its Supervision and Management costs for 2006/07 were £503 per house, the 7th lowest in Scotland.

- 7.26 The Council directs its expenditure on its assets to meet two key aims. It is building new houses, funded through a combination of sources including prudential borrowing; and, it is planning its investment programme for its existing stock to ensure all stock meets the SHQS by 2015. We also found it has a clear strategy for managing the HRA in relation to rents and to the Council's objectives for new homes, and it has a good level of detail in its budgets. It is clear that the Council's strong financial position is central to its ability to deliver these aims.
- 7.27 It is less clear whether the Council has robustly assessed whether its relatively low management costs allow it to deliver a service that is value for money, particularly given the areas of significant weakness we have identified in its housing management service. The Council has recognised that its housing service will need to change to respond to increasing stock levels following its new build programme. It has budgeted for a new staff team to manage the potential impact on its allocations and empty house performance and expects to have the team in place by spring 2008.
- 7.28 The Council's expenditure on the delivery of the homelessness service increased from £1.46m in 2005/06 to £1.7m in 2006/07, and included an increase in gross costs for B&B accommodation from £0.94m to £1.19m. The Council told us these increases are due to increasing numbers of people presenting as homeless. The Council has various initiatives it has introduced with the aim of reducing expenditure on B&B – including the "Spend to Save" and private leasing projects. We found the Council completed detailed assessments on the potential benefits and value for money of these individual initiatives. However we found only limited evidence that the Council is monitoring these projects in a strategic way to allow it to demonstrate the achievement of value for money.
- 7.29 The Council is developing its approach to using modern procurement methods, within an established corporate procurement strategy. It has procured recent major investment works using cost and quality criteria, and has ensured it maximised economies of scale in procuring materials and fittings such as kitchen and bathroom units for use in existing and new build housing. The Council has carried out some informal benchmarking of the costs of using the in-house repairs

service, but recognises that it has not extended this to fuller market testing. It has taken steps to establish relevant benchmarks in cost and performance for key elements of its maintenance work. For example, it has commissioned an external contractor to carry out empty house property repairs alongside its own teams to allow direct comparison with the costs and quality delivered. The Council plans to use these comparisons to assess the performance of its in-house service. Also, its forthcoming planned review of the repairs and maintenance services will include an appraisal of the current costs charged by its in-house repairs service.

8. Next Steps

- 8.1 This report highlights our findings following this housing inspection. We expect all organisations to respond effectively to our recommendations using their own improvement planning processes. We ask organisations that receive fair or poor assessments overall in their housing management, asset management and repairs service or homelessness service to submit an improvement plan to us within eight weeks of the publication of this report.
- 8.2 Midlothian Council's improvement plan should show how it intends to respond to our findings in housing management and homelessness services. The plan will be agreed with us. We follow up improvement plans at regular intervals.
- 8.3 If you would like to see the Midlothian Council's improvement plans you should contact:

John Burgoyne
Housing Manager
Midlothian Council
Buccleuch House
1 White Hart Street
Dalkeith
EH22 3YB

Telephone: 0131 271 3603

Email: john.burgoyne@midlothian.gov.uk

Website: www.midlothian.gov.uk

Sources of evidence

Groups and third parties consulted

- Midlothian Tenants' Forum
- TPAS
- Aspire
- Communities Scotland Tenant Participation Team
- Homepoint
- Scottish Government's Homelessness Team
- Scottish Public Service Ombudsman
- Citizens Advice Bureau
- Registered Social Landlords
- Neighbouring Local Authorities
- Women's Aid
- Shelter
- Bethany Christian Trust
- MELD (Mid & East Lothian Drugs)

Interviews/Meetings

- Councillor Milligan
- Councillor Thomson
- Trevor Muir, Chief Executive
- Ian Jackson, Director of Corporate Services
- Hillary Kelly, Head of Revenues and Housing Management
- Stephen Crawford, General Manager, Facilities/Construction
- Senior & frontline staff – housing and homelessness services
- Senior & service delivery staff – Commercial Services
- Staff in corporate functions: Risk Management, Finance, Internal Audit
- Staff in corporate functions: Policy, Best Value, Performance and Equalities
- Andrew Noble – Melville Housing Association

Reality checks

- Observation of information and advice to service users
- Observation of hostel and bed and breakfast accommodation
- Observation of housing reception
- Shadowing of allocations
- Shadowing of tenancy sign up interview
- Shadowing of assessment and follow-up interviews with homeless people
- Shadowing of temporary accommodation visits
- Shadowing of repairs call handling
- Shadowing of repair pre and post-inspections
- Shadowing of void repairs visits
- Shadowing of post-allocation visits
- Shadowing of pre-transfer and pre-exchange visits
- Shadowing of arrears visits
- Review of housing list applications and allocations

Appendix 1

- Review of information for applicants and tenants
- Review of homeless assessments and appeals
- Review of complaints
- Review of antisocial behaviour cases
- Review of arrears cases
- Review of legal actions against tenants
- Review of reported repairs
- Review of planned maintenance and improvement projects
- Empty property visits
- Estate visits

Key documents reviewed

- Midlothian Council's Inspection Submission
- Housing management performance reports
- Repairs and maintenance performance reports
- Relevant policies and procedures
- Relevant standard letters
- Arrears reports and eviction reports
- Minutes of meetings and associated reports
- Council newsletters and other publicity material
- Tenants' newsletters
- Tenants' handbook
- Council's website
- Outcome reports for housing management, property maintenance and homelessness
- Protocols with other agencies
- Local Housing Strategy
- Homelessness Strategy
- Housing Advice and Information strategy
- Tenant Participation Strategy
- Scottish Housing Quality Standard Delivery Plan

Examples of Positive Practice

These are areas we would highlight as working particularly well, taking account of the organisation's operating context:

Collecting service user feedback

The Council introduced a proactive approach to collecting feedback from tenants on its repairs service. Its MIDCON contact centre staff follow up a weekly sample of completed repairs by telephoning tenants directly for their feedback, both during and beyond normal office hours. This approach enables the Council to get a more accurate and representative sample of tenant satisfaction levels, and has greatly increased the level of responses the Council receives on the repairs service.

Education programme on ASB

The Council developed an education programme on antisocial behaviour after feedback from pupils during a housing options talk. The Council's Information Officer developed a presentation on anti-social behaviour in consultation with the Police and teaching staff. The Council now does joint presentations with the Police to pupils across Midlothian, to the Midlothian Training Service and to PAVE (programme of alternative vocational education). The talk covers the effects of anti-social behaviour on housing, vandalism, what an ASBO is and cyber-bullying. The programme has been so successful that it is now used by the Police in East Lothian in their schools' programme.

Glossary

Anti Social Behaviour Order (ASBO)	ASBOs are preventative orders designed to protect individuals from further anti-social behaviour that causes or is likely to cause alarm or distress. Breach of an order is a criminal offence, punishable by a fine or imprisonment.
Asset management	Ensuring that current and future assets (houses, land, etc) fully support the organisation's objectives – working towards having the right assets, of the right quality, in the right place at the right time.
Benchmarking	A process used by organisations to systematically compare service processes and performance to identify best practice.
Capital Programme	Programme of major repair works funded mostly from borrowing.
CFCR	Capital funded from current revenue
Common housing register (CHR)	A register of all applicants for social housing used by two or more landlords within an area.
Direct Labour Organisation (DLO)	Internal organisation that carries out work on behalf of housing departments.
Fixed Penalty Notices	These are one off penalties, issued by Community Wardens, in relation to litter and dog fouling.
Furnished Tenancy Grants	Part of the recommendations of the Homelessness Task Force to set up a national framework for furnished tenancies, one element of which is for a furnished tenancy grant scheme for units let to a homeless person.
HomePoint	<p>A department of Communities Scotland that supports providers of housing information and advice services.</p> <p>HomePoint has broken down advice activities into three types:</p> <ul style="list-style-type: none">• Type I active information, sign-posting and explanation.• Type II casework.• Type III advocacy, representation and mediation.
Housing list	A list of applicants for housing that is used by the local authority to allocate its housing stock.
Housing Revenue Account (HRA)	The budget a local authority has from rental income for managing and maintaining its houses and housing services.

ICT system	Information and communication system.
In Court Advisor	The In Court Advisor is employed by the Council to act on behalf of tenants in arrears who have to attend court. They provide independent advice and assistance and liaise with the housing or housing benefit service.
Mortgage to Rent Scheme	Helps people who are in danger of having their homes reposessed to stay in their home as tenants of a social landlord. The property is sold to a landlord and then rented back to the household.
Notice of Proceedings (NOP)	The formal notice provided to tenants informing them that their landlord is taking legal proceedings to seek a court order for recovery of possession of a property.
Partnering	In contract management, a structured approach to improving efficiency and quality of work. It aims to reduce confrontation between the Council and its consultants and contractors. Partnering requires formalised objectives, agreed problem solving methods and an active search for continued measurable improvements.
Performance Standards	Housing standards for all social landlords in Scotland, jointly agreed by the SFHA, COSLA and Communities Scotland.
Planned maintenance	The planned renewal or maintenance of key property components.
Pre-inspections	Inspections undertaken to ascertain the nature of the repair required.
Post inspections	Inspections undertaken following work to check the suitability and quality of repairs.
Procurement	The way an organisation obtains services or materials from other organisations or agents.
Qualifying Repair	Repairs that qualify for inclusion in the Right to Repair scheme.
Registered social landlord (RSL)	A landlord providing social rented housing that is registered and regulated by Communities Scotland.
Registered Tenant Organisation (RTO)	A tenant-representative group meeting certain conditions set down in the Housing (Scotland) Act 2001 and registered with a social landlord.

Response repairs	Day to day repairs carried out on a reactive basis, distinguishable from planned, capital or cyclical maintenance.
Right to Buy	The right of many Scottish tenants to buy their property at a discounted price, depending on length of tenancy.
Right to Repair	Statutory scheme which sets out timescales for some repairs, and what can be done by a tenant if a landlord does not do the repair within the timescales.
Schedule of Rates (SOR)	A costed list of all or most of the day-to-day repairs that a client is likely to instruct a contractor to do.
Scottish Housing Quality Standard (SHQS)	A minimum quality standard for all of Scotland's social homes. Landlords should achieve the standard by 2015.
Scottish secure tenancy (SST)	The Housing (Scotland) Act 2001 establishes the Scottish Secure Tenancy as the tenancy for all tenants of social landlords in Scotland.
Short Scottish secure tenancy (SSST)	Section 34 and schedule 6 of the Housing (Scotland) Act 2001 establish the basic conditions when a short Scottish secure tenancy can apply to some tenants of social landlords in Scotland in place of a full SST.
Section 5 referral	Where, under Section 5 of the Housing (Scotland) Act 2001, a local authority can request a registered social landlord that has accommodation in its area to provide accommodation to homeless people.
Shadowing	An inspection technique that involves accompanying and observing staff while they carried out their day-to-day tasks.
SMART criteria	Performance management acronym for: Specific, Measurable, Achievable, Relevant and Time bound.
Statutory Performance Indicator (SPI)	Indicators of local authorities' performance that are published by the Accounts Commission for Scotland.
Stakeholder	Any person or organisation using a landlord's service, affected by the landlord's actions or having an interest in the landlord's activities – an interested party.

Tenancy agreement	Legal document or contract between landlord and tenant setting out the rights and responsibilities of each.
Tenant assessor	Trained tenants (not of the landlord being inspected) who are part of the inspection team. They are involved in preparing for inspection, reading landlord materials and on-site visits as well as talking to tenants.
Tenure	The method by which a person occupies a property i.e. tenant, lodger, owner-occupier.
Variations	A term used to refer to the practice of changing a repair works order on site where the contractor feels additional or alternative work to that specified is required.
Void	A property without a tenant. Voids occur in the period between one tenant leaving and another taking over the tenancy.

About the Scottish Housing Regulator

The Scottish Housing Regulator (SHR) is an executive agency of the Scottish Government. We exercise independently the regulatory powers of Scottish Ministers in the Housing (Scotland) Act 2001. We register and regulate independent social landlords. These are usually housing associations, but they can also be housing co-operatives or companies limited by guarantee. We also inspect the housing and homeless services provided by local authorities.

We operate independently and impartially, while remaining accountable to Scottish Ministers for the standard of our work and for inspecting and reporting within the overall context of Scottish Ministers' strategic objectives for the social housing sector and tackling homelessness. A code of practice sets out what Ministers expect from us in delegating their regulatory powers to us. Our independence is further safeguarded by a Regulation Board that supports the Chief Executive to manage and direct the organisation.

Our purpose is to:

- protect the interests of current and future tenants and other service users;
- ensure the continuing provision of good quality social housing in terms of decent homes, good services, value for money, and financial viability; and
- maintain the confidence of funders.

Our work supports the principles of public service reform by promoting good services that are organised around the needs of the people who use them. We encourage registered social landlords (RSLs) and local authorities to be open, accountable, efficient and well governed. And we expect them to provide equal opportunity and open access to their services.

www.scottishhousingregulator.gov.uk

The Scottish Housing Regulator
Highlander House
58 Waterloo Street
Glasgow
G2 7DA

Tel: 0141 271 3810

E:shr@scottishhousingregulator.gsi.gov.uk



Availability in other formats

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