

Collaborative Scrutiny Review of the ASB Service

Carried out September/October 2020

Reported to Customer Insight Group 12 November 2020

Introduction

This collaborative scrutiny was commissioned due to the low levels of customer satisfaction reported for Cottsway's anti-social behaviour (ASB) service. Working with Cottsway staff we have looked closely at this key service area and tried to find ways to improve it. We think tackling ASB effectively is particularly important as it not only impacts on an individual's mental health and well-being but on whole families and communities.

We want all Cottsway's customers to feel safe and secure in their homes and hope this scrutiny review will go some way to helping Cottsway to deliver an improved service. This is our first scrutiny since we re-launched and we are extremely proud that we have managed to achieve this with such a small team and all online during what has been a particularly difficult and challenging year for us all.

Our thanks go to the staff who have helped us gather evidence and especially to the Cottsway customers who took the time to talk to us about their experiences of ASB and how Cottsway responded to their concerns. Some were positive and some were negative about their particular experience but all were extremely helpful. We hope this review provides Cottsway with ideas and suggestions that will benefit anyone who reports ASB in the future.

Vanda White (Chair)

Gill Browning

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Cottsway's Scrutiny Group

Background to the review

Over 2019/20 the Customer Insight Group noted the low levels of customer satisfaction reported for the ASB service. To address this Wendy Hardy, Head of Housing, suggested the group commission the Scrutiny Group to complete a review to better understand the reasons behind this. It was subsequently agreed to use the 'collaborative scrutiny' model as a framework for this review.

Scope of the review

The review focused on closed ASB cases reported in 2019/20 with the aim of gaining a better understanding of the reasons for customer dissatisfaction with the ASB service and to make recommendations on how the service can be improved. It includes a review of good practice and other landlords' approaches to ASB, a review of the ASB policy and procedure, complaints satisfaction, benchmarking of performance, interviews with customers and staff and a review of progress with a recent audit report.

Evidence

All of the research and recommendations in this scrutiny review can be supported with evidence. We have included some as appendices to this report but more is available on request.

Participants

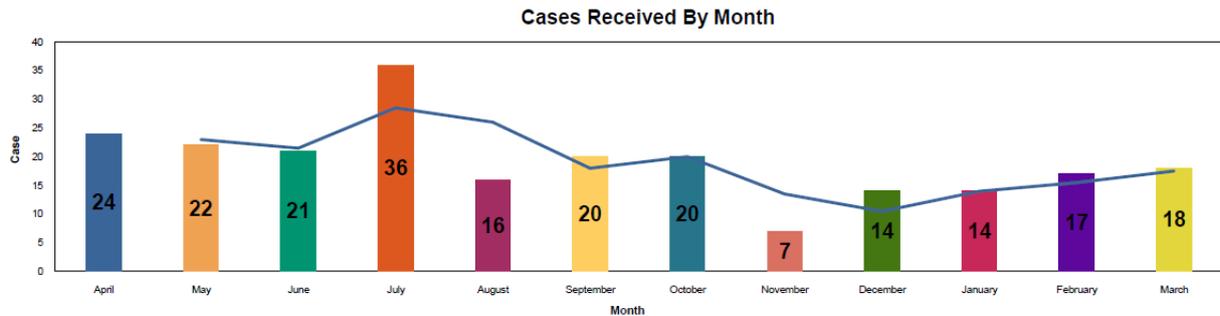
Thanks to the following people who helped with our review:

- Eight Cottsway customers who took part in interviews
- Rachel Arnold, Assurance Officer who completed the internal audit review
- Shaz Chudry, Neighbourhood Manager, Debbie Edgar, Neighbourhood Housing Officer and Gemma Keep, Customer Services Advisor who took part in interviews
- Claire Turner, Financial Planning Manager who helped with benchmarking
- Sara Long, Communications Officer
- Alex Williams, Customer Engagement Officer
- Vicki Paxford, Communities Manager

Findings - desk based research:

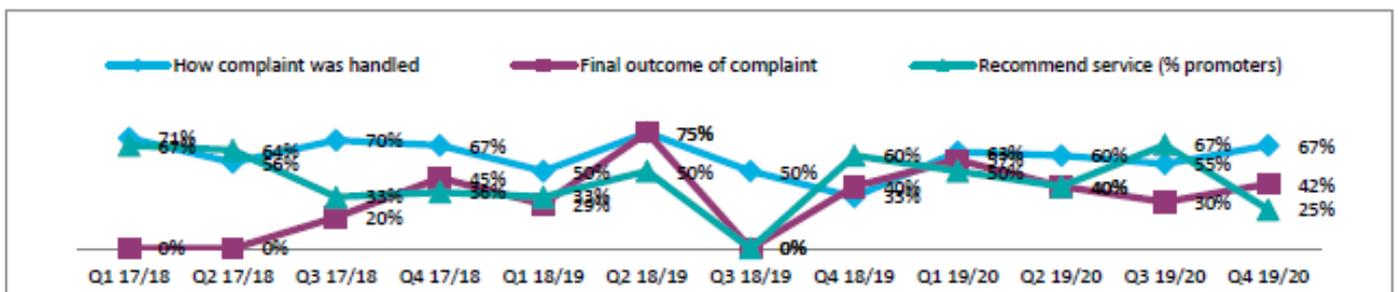
Satisfaction surveys – quantitative data

The review has focused on ASB cases reported in 2019/20 when a total of 229 cases were reported to Cottsway. Of these 226 were categorised as standard ASB, one as urgent ASB and two as sensitive ASB.



The data below shows the satisfaction with the ASB service in 2019/20 though is based on a total of only 29 responses to the satisfaction surveys sent out.

	Q4	Q1	Q2	Q3	Q4
ASB complaints	18/19	19/20	19/20	19/20	19/20
How complaint was handled	33%	63%	60%	55%	67%
Final outcome of complaint	40%	57%	40%	30%	42%
Recommend service (% promoters)	60%	50%	40%	67%	25%
NPS Score	20	0	20	67	-8



HouseMark benchmarking

When we benchmarked these results with other providers with a stock size between 2,000 and 5,000 properties we can see that Cottsway’s performance is in the lower quartile across all the key indicators whilst the number of reports Cottsway receives per 1,000 properties is comparatively high. A copy of this report is available at appendix one.

Policy and procedure

Our review of the ASB Policy has identified some positive points and some areas we think could be improved. When reviewing the policy we have taken into account examples of best practice we have identified elsewhere and also checked if Cottsway are actually delivering on the commitments made.

- We noted that Cottsway use a definition of ASB that is recognised as Good Practice in the Peabody report into anti-social behaviour (Reducing anti-social behaviour March 2019).
- Cottsway do provide pre-tenancy training for new tenants that covers ASB though not all new tenants attend. Information is also included in the Customer Charter.
- Cottsway do provide starter tenancies for all new tenants.
- Cottsway do use 'secure by design' principles when designing new developments.
- Cottsway do work closely with relevant partner agencies.
- Cottsway do offer a free Noise App to help record noise nuisance.
- New staff in the Customer Services Team do receive training on ASB.
- Cottsway do conduct customer satisfaction surveys for ASB and the results are regularly presented to Board through the quarterly Executive Business Report.

Areas where we noted the commitments made in the policy could be improved or are not being met include:

- Consulting with customers at a local level to consider measures that may be taken to prevent ASB.
- With ongoing ASB the policy says the assigned staff member will "communicate directly with the complainant...ensuring the complainant is kept informed about the status of the case throughout it's duration". In practice this seems to sometimes be delegated to members of the Customer Services Team.
- We were unable to see a copy or template of an Action Plan and customers we interviewed did not receive one or details of how to contact Cottsway in an emergency. This is an issue that was also raised in the Mazars audit of 2019.
- Existing staff in the Customer Services Team do not receive annual refresher training on ASB.
- We saw no evidence that Neighbourhood Housing Officers receive training on ASB on an ongoing basis.
- Cottsway's Communications Officer has been unable to find any evidence of articles and activities to specifically raise awareness of ASB being published between April 2018 and October 2020.

Areas for consideration

Vulnerability risk assessments

In addition, we noted that the policy sets out how Cottsway will provide support for vulnerable perpetrators and, whilst there is a section on 'Supporting Complainants and Witnesses' we were surprised to see there is no reference to assessing the vulnerability of the complainant. By adopting a structured risk assessment of each complainant we think they will be better supported and Cottsway will be able to demonstrate a robust approach to managing risk. An example of a simple but effective ASB vulnerability risk assessment is available at appendix three.

Community Trigger

We were also surprised to see no reference to the Community Trigger in the ASB Policy. Further information on this is included in the Investigating Best Practice section and we have included it in our recommendations.

Procedure

Cottsway were unable to provide us with a copy of the ASB Procedure but did produce a document listing the steps to take when managing ASB through the Housing Management case management system. This was also noted in the Assurance Review carried out by Cottsway's Assurance Officer (see below) with the recommendation a new procedure is creating using the approved template which shows who has responsibility for the procedure and dates it will be reviewed.

Assurance review:

We looked at the results of a compliance review carried out in 2019 by the auditors, Mazars LLP. That review looked at the management of ASB cases and found shortcomings in the development of ASB action plans and how Cottsway communicate with customers. Cottsway proposed several suggestions to resolve these issues.

We then asked Cottsway's Assurance Officer to complete an assurance review on 10 recent ASB cases to see whether Cottsway's suggestions had been put into practice. The assurance review looked for evidence that Cottsway:

- takes prompt, appropriate and decisive action in dealing with ASB complaints
- can demonstrate that they regularly update residents on the status of their case
- agree and review clear action plans with residents.

The review found that the current ASB service aligns with both policy and procedure. The only recommendations were that Cottsway should:

1. update the ASB procedure to show ownership and review dates (using the approved template)
2. clarify the procedure to realign the timeframes for responding to customers so that they match those agreed in the action plan rather than using set timeframes from the procedure.

Investigating best practice:

We looked at the ways other landlords publicise their ASB service on their websites, including their procedures for initial reporting. We compared these with Cottsway's own website and noted:

- Other landlords operating in our local area give full details of the ASB service they offer, including what is/is not considered ASB, timescales etc. on their websites.
- Other landlords also use a more detailed online reporting form which asks for details of how the ASB has affected the complainant. This could help the person dealing with their complaint to address any vulnerabilities in an appropriate and effective way.
- Unusually, neither Cottsway, West Oxfordshire District Council nor Thames Valley Police mention the right to request an ASB case review (also known as the 'community

trigger’) on their websites. This option is explained on all the other council and landlord websites looked at by the group in the areas Cottsway holds stock and would be of interest to customers who have experienced persistent ASB.

Links to these sites are available at appendix two.

Peabody Report

We also read the Peabody Report: Reducing Anti-Social Behaviour (March 2019) and found this a really useful document that captured a lot of current good practice in managing ASB. Two points we felt were worth considering by Cottsway were the introduction of vulnerability assessments for complainants (covered earlier in this report) and categorising ASB into ‘low level’ and ‘high level’ and responding to them differently.

This approach is about empowering complainants to better help themselves deal with low level ASB issues by making more information available whilst still supporting those identified as vulnerable.

A copy of the report is available here <https://www.peabody.org.uk/media/13326/asb-report.pdf>

Interviews

Cottsway customers

We interviewed a sample of eight customers who had made complaints about ASB during 2019-20. These customers agreed to take part in response to a written invitation from the Communities Manager. We asked each customer the same set of questions and analysed their responses. We found that:

- Customers found reporting easy but the majority did not use the website
- A named staff member was appointed in most cases (usually the NHO but one reported the CSA was their named contact) but only half the customers interviewed felt this person understood their situation
- Just over half were kept updated and half were happy with the level of information provided
- Most did not feel Cottsway explained clearly what they could and could not do to help
- Only half felt their complaint was taken seriously, with half either unhappy or unsure whether our system or staff was the problem
- Most either did not receive an action plan or felt it was inadequate. It was unclear whether they had all received a copy. This differs from the findings in the assurance review.
- Most did not feel adequately supported but there were not many ideas on how to improve this.
- Few were told of the outcome before their case was closed and communication was unclear.
- Although most complainants could identify something positive in the management of their case, half said it was a negative experience overall, mentioning either the process itself or the lack of support from staff as the reason.

Suggestions for improvements included:

- improve communications and staff attitude
- take a more personal approach
- simplify the process and make it more accessible

Cottsway staff

Towards the end of our review we interviewed Shaz Chudry, Neighbourhood Housing Manager and Debbie Edgar, Neighbourhood Housing Officer and ASB Lead. Both were enthusiastic about the service they deliver and the improvements they would like to see. These interviews confirmed:

- There is no specific training plan in place for Neighbourhood Housing Officers
- There is no workable template in place for an Action Plan, instead information is held on the housing management system
- Complainants do not receive an Action Plan
- ASB satisfaction is not analysed for each NHO/case manager
- Closed cases are not reviewed to identify patterns or learning
- Cottsway do work in partnership with a range of external agencies to tackle ASB
- When a case is closed the complainant is contacted by phone or email, not letter.

We also interviewed Gemma Keep, Customer Services Advisor, to better understand the role of Customer Services in the ASB process. Gemma told us:

- CSA's are the initial point of contact for the complainant, take the details and initiate the case on the housing management system
- She had received some good training on ASB when starting in her role and the team have guidance documents they can refer to
- Calls are monitored and CSA's coached to ensure call quality is consistent
- CSA's usually take updates from complainants and pass them on to the NHO
- She doesn't know how satisfied complainants are with the ASB service or the outcomes of cases
- She thinks complainants don't always understand what Cottsway can do for them in terms of addressing ASB
- She would like to see more information on ASB available on Cottsway's website and in the Tenancy Starter packs
- She would like complainants to be able to upload photos to the website when reporting ASB online.

Conclusion

In conclusion, we believe satisfaction with the ASB service is low compared to similar organisations because there is a lack of information and understanding about what Cottsway can do to help and customers' expectations are sometimes not met. Some customers felt that staff dealing with their cases did not provide them with enough support or information or did not understand the impact they felt the ASB was having on them. However, one person we interviewed was highly satisfied with every aspect of her case so this is not universal. Some customers we spoke to were not clear that their case had been closed and most had not received an Action Plan. Overall, we think a clearer focus on providing information, managing expectations and regular communication will address many of these issues. Below we have set out a number of recommendations for Cottsway to consider.

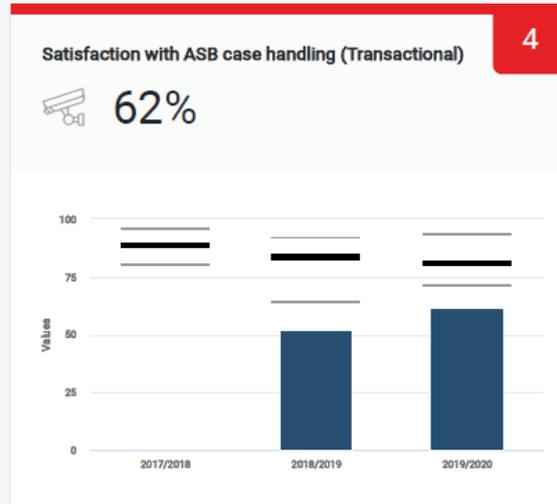
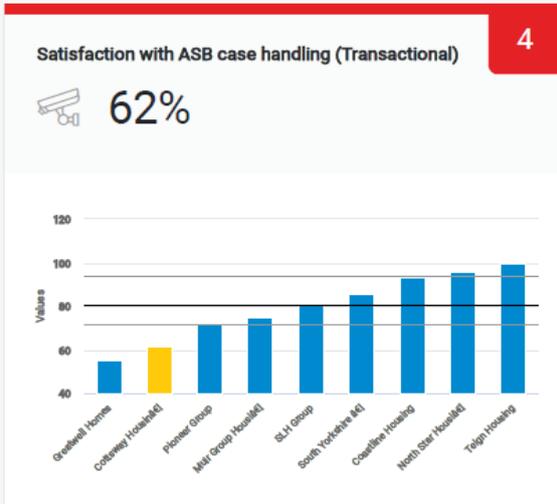
Recommendations

On completion of the review we identified a number of recommendations that we would like Cottsway to consider implementing as we believe these will bring about improvements to the ASB service for customers and the staff involved

1. To have in place an annual training plan for NHO's and CSA's.
2. To monitor satisfaction by Neighbourhood Housing Officer and use it to identify any training needs.
3. To review and update the ASB Policy.
4. To review and update the ASB Procedure using the approved template.
5. To complete a vulnerability risk assessment for all complainants.
6. To make a flow-chart of the ASB process available so complainants can better understand the process Cottsway use when dealing with ASB.
7. To ensure complainants receive a copy of an agreed Action Plan in some format.
8. To schedule regular case reviews and update the complainant with progress.
9. To offer at least one face-to-face online meeting with the NHO at the beginning of the case.
10. To send a letter when closing an ASB case, whether by post or email.
11. To follow up closed cases with a courtesy call 3-6 months after closing the case.
12. To promote the Community Trigger on the website and include in the ASB Policy
13. To improve the level of information about ASB on Cottsway's website and in the tenancy starter pack.
14. To develop a Communications Plan to increase awareness of ASB and the actions Cottsway takes to address it with a focus on building confidence in Cottsway's processes.
15. To see if complainants can upload photos to the website.
16. When developing the customer portal consider including the ability to track progress of an ASB case report and upload supporting information.
17. To provide a 24 hour answerphone dedicated to ASB and/or an ASB hotline.
18. To see if Cottsway can make more use of technology such as CCTV when addressing ASB.
19. To consider treating low level and high level ASB differently and making this clear in the policy and on the website (as per Peabody report).
20. Cottsway should review all cases, feedback and satisfaction each quarter and produce a short summary report to identify learning opportunities.

Appendix one: ASB benchmarking 2019/20

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Appendix two: Investigating best practice – links to websites

<https://www.greensquaregroup.com/customers/your-tenancy/antisocial-behaviour>

<https://www.greensquaregroup.com/customers/your-tenancy/antisocial-behaviour/report-antisocial-behaviour>

<https://www.rooftopgroup.org/anti-social-behaviour>

<https://www.sanctuary-housing.co.uk/antisocial-behaviour-asb>

<https://my.sovereign.org.uk/form/non-logged-on/report-anti-social-behaviour>

<https://www.stonewater.org/supporting-you/anti-social-behaviour-asb/what-is-anti-social-behaviour/>

<https://www.stonewater.org/supporting-you/anti-social-behaviour-asb/how-to-report-anti-social-behaviour/>

https://www.oxford.gov.uk/info/20101/community_safety/269/community_trigger_process

<https://www.southoxon.gov.uk/south-oxfordshire-district-council/community-help-and-safety/antisocial-behaviour-asb/community-trigger-help-with-ongoing-antisocial-behaviour/>

<https://www.cherwell.gov.uk/info/120/community-safety/301/anti-social-behaviour/2>

<https://www.whitehorsedc.gov.uk/vale-of-white-horse-district-council/community-help-and-safety/anti-social-behaviour-asb/community-trigger-help-with-ongoing-antisocial-behaviour/>

<https://www.gov.uk/guidance/anti-social-behaviour-asb-case-review-also-known-as-the-community-trigger>

APPENDIX 3 – Risk Assessment Matrix

Name:	Address:
Incident No:	

History	1. Other than this occasion - how often do you have problems?	5 3 2 1 0	Daily Most days Most weeks Most months Only occasionally
	2. Do you think the current incident is linked to previous incidents? If so why?	2 0	Yes No
	3. Do you think that incidents are happening more often and/or are getting worse?	2 0	Yes No
	4. Do you know the offender/ s?	2 1 0	They know each other well They are 'known' to each other They do not know each other
	5. Does the perpetrator (or their associates) have a history of or reputation for intimidation or harassment?	6 4 2 0	Perpetrator or their associates are currently harassing the complainant Perpetrator or their associates have harassed the complainant in the past Perpetrator or their associates have not harassed the complainant, but have a history or reputation for harassment or violent behaviour Perpetrator or their associates have no history or reputation for harassment or intimidation
	6. Have you informed any other agencies about what has happened? If yes, are you happy for us to discuss this problem with them? Details:	0 1	Yes No

Vulnerability	7. Which of the following do you think that this incident deliberately targeted Specify	4 3 1 0	You Your family Your community None
	8. Do you feel that this incident is associated with your faith, nationality, ethnicity, sexuality, gender or disability? Details:	3 0	Yes No
	9. In addition to what has happened, do you feel that there is anything that is increasing you or your household's personal risk (e.g. because of personal circumstances) Details:	3 0	Yes No
	10. How affected do you feel by what has happened? Details	0 1 2 3 5	Not at all Affected a little Moderately affected Affected a lot Extremely affected

Support	11. Has yours or anyone's health been affected as a result of this and any previous incidents? Details:	3 3	Physical health Mental health
	12. Do you have a social worker, health visitor or any other type of professional support? Can we speak to them about this? Details:	0 1	No Yes
	13. Do you have any friends and family to support you?	3 3 1 0	Complainant lives alone and is isolated The complainant is isolated from people who can offer support The complainant has a few people to draw on for support The complainant has a close network of people to draw on for support
	14. Apart from any effect on you, do you think anyone else has been affected by what has happened? Details:	3 2 1	Your family Local community Other
	TOTAL SCORE:		



APPENDIX 3 – Risk Assessment Matrix

<p align="center">34 32 28 26 24 22 20 18 16 8 4 0</p> <p align="center">HIGH MEDIUM LOW</p>	<p>POLICE Refer to force 'Life at Risk' policy and procedure Crime risk survey to be conducted and install appropriate security devices (alarms, CCTV) Create documented care plan and arrange multi-agency strategy meeting</p> <p>HOUSING TEAM / ASB TEAM Evaluate need for protective intervention (e.g. emergency injunction) and pursue if appropriate Provide/install appropriate security measures (alarms, CCTV, mobile phones and patrols) Refer to Neighbourhood Policing Team/multi agency team and arrange strategy meeting</p> <p>NEIGHBOURHOOD WARDENS</p> <p>VICTIM SUPPORT / VICTIM WITNESS CHAMPION / OTHER SUPPORT SERVICES Referral to victim support</p>
	<p>POLICE Instigate and record regular neighbourhood policing team visits Refer to partner agencies</p> <p>HOUSING TEAM / ASB TEAM Provide/install appropriate security measures (alarms, CCTV, mobile phones and patrols) Maintain communication and visit in accordance with case management action plan Refer to relevant supportive agencies</p> <p>NEIGHBOURHOOD WARDENS</p> <p>VICTIM SUPPORT / VICTIM WITNESS CHAMPION / OTHER SUPPORT SERVICES Referral to victim support</p>
	<p>POLICE Follow up CSO visit Referral to victim support</p> <p>HOUSING TEAM / ASB TEAM Maintain communication and visit in accordance with case management action plan Refer to relevant supportive agencies</p> <p>NEIGHBOURHOOD WARDENS</p> <p>VICTIM SUPPORT / VICTIM WITNESS CHAMPION / OTHER SUPPORT SERVICES</p>

CONSENT TO INFORMATION SHARING

I consent to agencies obtaining and sharing information as part of the multi-agency work to help and secure my safety and that of my family.

If there are child protection concerns, information will be shared regardless of whether this form is signed.

Signature: _____ Date: _____

PRINT NAME: _____