

Tenancy Audit Policy

This policy outlines Croydon Council's approach to the management of Tenancy Audits

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1. Purpose

1.1. This Policy sets out Croydon Council's approach to carrying out tenancy audits.

1.2. Croydon Council aims to deliver excellent services to tenants, and in doing so, is committed to undertaking a three-year rolling programme of visits to all Council properties.

2. Statement of Intent

2.1. The visits will allow the Council to:

- Advise tenants of their responsibilities
- Check and confirm the details of tenants and their household members.
- Identify and report damp and mould.
- Identify and collect equality and diversity data.
- Identify and report repairs.
- Identify gaps in household details.
- Identify tenancy fraud and other breaches of tenancy.
- Identify the support needs of tenants and refer them to the appropriate teams or services.
- Identify households who are under-occupying properties and appropriately refer them, if they wish to move to smaller properties.
- Identify and work with internal and external services to address and work with tenants to improve building safety.
- Promote resident engagement.

2.2. All data will be recorded on Croydon's housing management system.

3. Scope

3.1. Visits will be targeted, allowing Croydon to use its data to prioritise visits.

3.2. Identity Checks

3.3. We will check and confirm the details of tenants and their household members.

- ID verification
- Demographic information (e.g., age, gender and ethnicity)
- Composition of your household
- Up-to-date contact details
- Income of your household, including any benefits such as universal credit

3.4. Damp and Mould

3.5. Visits in blocks and/or estates where there have been a number of reports of damp and mould. The visits will allow Croydon to take prompt action to resolve issues as well as put in place short and long-term strategies to address issues identified.

3.6. Gaps in Diversity and Equality data.

- 3.7. This will allow Croydon to provide services that are better suited to the needs of tenants, this includes data on disabilities, ethnicity, sexual orientation, and belief. This data will align with the strands collected across the Council and will play a significant role in ensuring that all tenants receive a fair and equitable status, as well as comparing customer satisfaction across profiles.
- 3.8. **Tenants that have not contacted the Council over a given period and non-estate properties.**
- 3.9. The well-being of tenants is important to Croydon. The visits will allow Croydon to check on their wellbeing especially those not living on estates, where quarterly inspections do not take place.
- 3.10. Tenant profile information will be used to target specific services at tenants i.e., financial inclusion services and youth projects, and identify specific vulnerabilities or disabilities (i.e., visual impairment, hearing difficulty, safeguarding or mental health illness, etc)
- 3.11. **Tenancy Fraud**
- 3.12. When we visit, we will ask the tenants and the household for proof of identity to guard against fraud. It will show us that the tenant is the person living in the home. We will ask for two forms of identification, which must include one photographic form of ID.
- 3.13. Suitable forms of Identification could be:
- Utility bill
 - Bank statement
 - Passport
 - Birth certificate (and for children)
 - Driving Licence
 - Official communication from the Department of Works and Pensions (DWP) or another government body (in the past year)
- 3.14. The Council is committed to making the best use of its housing stock and in doing so will comply with its regulatory responsibility.
- 3.15. Internal and external data will be used to target visits at tenants who are potentially subletting their properties and/ or not using their properties as their principal home.
- 3.16. Croydon will take legal action to recover properties, which they believe are being sublet, ensuring they are available for families or individuals in genuine need of housing.
- 3.17. The Prevention of Social Housing Fraud Act 2013 made it a criminal offence for social housing tenants to sublet or acquire social housing through deception. Croydon will use the act where possible to prosecute these individuals who can potentially be fined and/or jailed for two years.

3.18. **Under Occupying**

- 3.19. Visits will be used to Identify households that are under-occupying properties, and appropriately refer tenants to Allocations if they wish to move to smaller properties. Croydon will actively support tenants who wish to downsize.

4. Reporting

- 4.1. Managers will be responsible for targeting visits appropriately and will use monthly reports to monitor the performance of their team.
- 4.2. The Head of Service will produce a report annually, outlining the impact of the audits, which will be shared across housing.

5. Complaints

- 5.1. Should there be a complaint from the outgoing tenant or the new tenant concerning any aspect of the void works, this will be dealt with via the Council's Corporate Complaints Policy.

6. Reasonable Adjustments

- 6.1. Croydon Council will make reasonable adjustments to support our residents' needs when they access our services. The term 'reasonable' refers to what we can do without compromising our resources, efficiency, or ability to practically fulfil requests. This does not include [Aids and Adaptations](#) to our properties and common parts of a building.
- 6.2. No resident should be at a disadvantage when accessing our services. The following statements offer a general overview to ensure that our services are adjusted to meet the needs of our residents where possible. This list is not exhaustive, and we will adapt our approach based on individual resident needs.
- 6.3. We aim to provide services that are accessible to all who require them. As a result of this, we will:
 - Ensure our officers get to know our residents and their individual needs
 - Provide a range of ways for residents to contact our officers including phone, mail, email and via [Housing Online](#)
 - Provide alternative communication methods on request, such as Braille, foreign language interpreter, large print etc.
 - Ensure residents are always able to select their preferred method of contact.
 - Ensure our offices are fully accessible to visitors
- 6.4. We will continue to diversify our services to meet residents' needs where possible.

7. Equalities

- 7.1. The Council is committed to promoting fair and equal access to services and equal opportunities in employment, the procurement of goods, and as a community leader. The Council's policies, procedures, and day-to-day practices have been

established to promote an environment free from unlawful and unfair discrimination while valuing the diversity of all people.

- 7.2. Discrimination on the grounds of race, nationality, ethnic origin, religion or belief, gender, marital status, sexuality, disability, and age is not acceptable: the Council will take action to ensure no person using the Council's premises or services receives less favourable treatment or is disadvantaged by requirements or conditions that cannot be justified. The Council will tackle inequality, treat all people with dignity and respect, and continue to work to improve services for all service users.
- 7.3. The legal framework for the Council's approach is provided by the Equality Act 2010 and specifically by the Public Sector Equality Duty, under which a public authority must work consciously to eliminate discrimination, harassment, and victimisation and to advance equality of opportunity and foster good relations between people with differing characteristics.
- 7.4. Further detail on the Duty, and the Council's approach to fulfilling its requirements, can be found on our website.

8. GDPR and Data Protection Act 2018

8.1. Housing Management recognise the commitment to ensure that all data is:

- Processed lawfully, fairly, and in a transparent manner.
- Collected for a specific and legitimate purpose and not used for anything other than this stated purpose, or as provided for in our privacy and fair processing notices.
- Relevant and limited to whatever the requirements are for which the data is processed.
- Accurate, and where necessary, kept up to date. Any identified inaccuracies will be amended or removed without undue delay.
- Stored for as long as required, as specified within Housing Management's Records Retention Policy.
- Secured with appropriate solutions, which protect the data against unauthorised or unlawful processing and accidental loss, destruction, or damage.

Further information about the Council's commitment to the General Data Protection Regulations (GDPR) can be found on the Council's website)

9. Monitoring and Review

- 9.1. This policy will be reviewed every 3 years, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other Council-wide policies.

9.2. Arrangement for a full internal audit of the Tenancy Audits process to be undertaken by Croydon Council's Internal Auditors. The full scope of the audit will be agreed upon with the Internal Auditors, Director of Housing Management, and Heads of Service.

10. Document Control

10.1. This is a controlled document and should not be changed unless by authorisation of the policy owner.

Monitoring		
Approved Date:	16 September 2024	
Next Review Date:	1 April 2027	
Effective date:	23 September 2024	
Consultation Review		
Stakeholders review:	13.03.2024	
Legal review date:	22.03.2024	
Residents reading group:	April 2024	
Policy owner:	Director of Housing Management	
Ratified by:	Housing DMT on 16 September 2024	
Equality impact assessment:	The impact of this policy will be measured as it is implemented and used as part of a scheduled 1-year implementation compliance review.	
Version History		
Version Number	Summary of change	Author and Approver
1.0	New Policy	Developed and reviewed by subject matter experts in Housing and the Residents Reading Group