**Tenants Voice Scrutiny Panel (TVSP)**

**Scrutiny of North Star’s Customer Access to Information**

**November 2021**

**Summary**

This report sets out the findings and recommendations of the TVSP in relation to its scrutiny of customer access to information.

1. **Introduction**

The Tenants Voice Scrutiny Panel (TVSP) is an independent group of customers who carry out resident-led scrutiny of North Star.

As part of the current scrutiny programme, it was decided to focus on Customer Access to Information and determine whether the policies & procedures and action plans are fit-for-purpose, timely and represent good value for money.

TVSP quickly established that North Star is already dedicating a significant number of resources to the subject. Therefore, TVSP chose to approach this scrutiny exercise as a high-level audit exercise rather than delve into the mechanics of each workstream, as there was clearly too much detail to consider in the available time. Additionally, TVSP sought assurances from NS that customers will be meaningfully involved in helping to guide and shape the various projects as they unfold.

1. **How we chose Customer Access to Information**

Previously, TVSP chose review subjects based on service data and intelligence, anecdotal feedback from management and frontline staff and their own experiences as customers of North Star.

For 2021, a new approach was adopted which seeks to create a structure that allows for feedback, data and enquiries to flow between board, TVSP, North Star staff and customers as a whole. This will enable board to discuss issues directly with TVSP and commission work that supports strategic decision making as well as TVSP working directly with customers to understand current issues that they wish to be reviewed. This new proposal will be adapted to ensure it meets the needs of both TVSP and board. Following its implementation for this scrutiny exercise a period of testing will be undertaken to ensure the approach meets the needs of tenants and North Star.

TVSP used the first North Star promise, **’We will build open and honest relationships that respect your individuality and make sure you have access to information that matters to you.’** as a subject to engage with customers and generate feedback, themes and issues that are most important to them. The promise formed the basis of a mass engagement with customers that has informed the focus of this TVSP review and involvement activity. In this report, TVSP has collated this feedback and presented our findings directly to board independently, but with the administrative support of North Star staff and mentoring from Tpas.

TVSP was presented with full analysis of the responses and carried out an exercise to select a topic.

Based on the analysis, the elements of the promise selected for further consideration were:

* Open and honest relationships
* Respecting individuality
* Access to information

Of the three headings, the responses provided by tenants to the last bullet point raised the biggest areas of concern for TVSP. The primary focus of this scrutiny exercise was on access to information. Open and honest relationships and respecting individuality were treated as cross-cutting themes throughout TVSP’s exploration of the subject. Several questions were raised for which TVSP intended to establish detailed answers.

The main questions TVSP sought to answer were:

* How does North Star know what information matters to tenants?
* How do tenants prefer to access information?
* The social housing white paper: *The charter for social housing residents* (2020) asks social landlords to be open and transparent with information. How will North Star ensure that tenants who want to access headline information are able to do so and, those who want more detailed information are also able to do so?
* How does North Star ensure tenants can have complete trust in the information it provides?
* Will North Star’s contractors be expected to participate in providing customer access to information?
* Can tenants opt to have digital communication, only?
* What is North Star doing about introducing an effective Customer Relationship Management (the technology used to manage interactions with customers and potential customers) system?
* TVSP will run three other threads through the review: 1) What is North Star currently doing in relation to the subject, 2) What does North Star already have planned? 3) How do TVSP’s findings relate to the promise, in all respects
1. **How TVSP carried out the scrutiny**

TVSP have access to the information needed to carry out the scrutiny, except for any confidential and legally protected information, as well as to the relevant North Star staff.

TVSP met regularly to discuss the project and used a customer survey, presentations, interviews, and document reviews to build a picture of how North Star attempts to meet its promise.

1. **Conclusions**

In our view, NS has been actively preparing for the introduction of the housing white paper and has directed significant resources to examine customer access to information in general.

We accept that is difficult to prepare for a new Act of Parliament until the legislation has been passed and all the details are set out. The Regulator of Social Housing will also have considerable input to the execution of the legislation. However, North Star’s management accepts that many of the proposals in the white paper are simply the right thing to do and they are not waiting for the white paper to become statute.

Importantly, we have received assurances from management that customers will be meaningfully engaged in reviewing the types of information available; the format of information and how to access it. NS has a good track record for customer involvement, and we have confidence in the plans that we have been shown.

Evidently, there are several action plans and working groups in place regarding this subject. We would like assurances that the board is monitoring the action plans to ensure on-time delivery.

We question whether NS prefers to focus on giving customers access to financial information and performance data at the expense of wider information about policy decisions and spending choices, for example. The absence of a Data Classification policy would suggest that NS is not looking at the whole picture when it comes to publishing information – customer access to information covers much more than financial figures and performance data.

As mentioned in the findings the arrangements are in place for customers to formally request access to information. There could be an increase in requests as customers are made aware of their rights. We question whether there is scope in any such arrangements for information requests to be downgraded by staff and treated as something other than formal requests for information? How will the board monitor formal requests to ensure they are not downgraded?

**Recommendations**

1. To create a Data Classification policy.

**Response from Senior Management Team (SMT)**

Currently we have a privacy statement documented on our webpage which details our approach to collecting and managing customer data <https://www.northstarhg.co.uk/privacy-statement/>.

The recommendation to develop a data classification policy will be picked up during the next 12 months as part of our improvement work on managing data and in consultation with customers on access to information as part of the social housing White Paper action plan.

1. To engage with North Star’s contractors to confirm what level of information can be shared with customers by suppliers.

**Response from SMT**

This will be addressed as part of the social housing white paper action plan and links to the review of GDPR and wider work being undertaken in the organisation to improve management of data. We will work with contractors to understand where data is held both by contractors and within the supply chain during the next 12 months.

1. To introduce a system to identify the source(s) of the information published by North Star and whether the information has been validated by an external body.

**Response from SMT**

Where it is possible to cite sources and validations of data and information we will do so. This will include references to benchmarking organisations and professional memberships such as the Institute of Customer Service where appropriate.

1. To adjust the customer profile to add a feature which would identify whether a customer only wanted digital communication.

**Response from SMT**

Some of our processes require us to utilise alternative methods of communication, for example legal processes require communication in writing. However, we absolutely do want to offer choice to customers and work with customer preferences as far as possible.

At an individual level, customers can currently engage with housing officers using a preferred digital method, this includes email, text message and multimedia messages through WhatsApp. If this is a preferred method and the situation lends itself to responding using these channels, housing officers respond using the same. However, there is no systematic approach in place for this to be recorded and identified on the customer record.

1. To make available to customers, information about how North Star is meeting the aims of its Digital Strategy – North Star’s plan of action to get the greatest business benefits from data and digital technology.

**Response from SMT**

Our digital strategy will be updated on its [own website](https://www.digitialstrategy.inspired-digital.co.uk/) and we will continue to share updates with customers as progress is made both in person and print.

1. To introduce a texting facility to the Customer Relationship Management system to enable customers to contact North Star via text.

**Response from SMT**

North Star has recently gained access to a two way text messaging platform with EE and BT. The Head of Digital is identifying potential applications for this platform to improve communication with customers wishing to communicate using messages. This will not however link directly to the CRM system and is a standalone service.

1. To assess what information can be provided to customers about policy and spending decisions, and how to make such information easily available.

**Response from SMT**

North Star has a history of involving customers in developing policy approaches and will continue to through the ‘policy consultation’ group. Recent examples of this have included the complaints policy/procedure and access to housing policy which involved customers who had cause to use the services. Customers have also been involved in processes for procuring new providers on services which are received by customers.

We welcome the recommendation on increasing transparency in decision making and would like further dialogue with TVSP in terms of examples of good practice identified through this research.

**Next Steps**

The TVSP will follow an action plan to ensure that the above recommendations

are implemented and will seek explanation for any delays and amendments

to the action plan.

**Appendix 6: List of documents reviewed**

Tenant Digital Engagement Analysis report: Maldaba (2020)

ICS Trust Research Summary (2021)

ICS Who Do We Trust report (2021)

ICS Benchmarking report (2021)

North Star Value for Money Statement (2019)

North Star Vision to 2023 (February 2018)

North Star structure chart (2021)

The Charter for Social Housing Residents – Social Housing White Paper

North Star Customer Access to Information presentation

‘Housing associations sceptical about FOI-style transparency demands in white paper’ article Inside Housing. (November 2020)

Presentation: Access to Information (June 2021) – Adam Clark, Executive Director of Customers, North Star

North Star Digital Strategy <https://news.northstarhg.co.uk/digitalstrategy> (current 2021)

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Tenants Voice Tenant Scrutiny Panel:

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