Tenancy Audits

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You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the Brighter Places Policy Index Sheet. Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for always complying with the policy requirements

Should colleagues require any reasonable adjustments to allow for engagement with this document please contact the policy lead.

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1. Policy Statement

This policy sets out how Brighter Places approach to identifying and managing Tenancy audits in a consistent manner.

We use tenancy audits as a proactive tool for compliance monitoring and early intervention. This approach helps us prevent disrepair, maintain property standards, safeguard customer wellbeing, and protect the integrity of our housing stock.

Tenancy audits are carried out across most property and tenancy types managed by Brighter Places, using a planned and risk-based approach. Audits may be prioritised where there are known or emerging concerns, such as property condition, access issues, occupancy, or potential tenancy misuse.

Tenancy audits are carried out across most of the property and tenancy types, including all general needs accommodation and properties owned by Brighter Places where a separate provider delivers a support service.

For the avoidance of doubt, tenancy audits are not undertaken under this Policy and Procedure for Milestones Trust or at Rackfield House, our supported accommodation scheme in Bath.

2. Commitment

We are committed to carrying out regular and thorough tenancy audits to support high-quality housing management and strong customer relationships.

Tenancy audits play a key role in helping us keep homes safe, secure, and well managed, while allowing us to identify and address any issues at an early stage.

Our approach includes an audit with all new tenants at six weeks, alongside a planned programme of ongoing audits across our general needs tenancies.

We take a risk-based approach, prioritising audits where there may be concerns about property condition, access, occupancy, or potential tenancy misuse. This helps us protect our customers' wellbeing and ensure our homes are used appropriately.

Through this proactive and consistent approach, we demonstrate our commitment to transparency, regulatory compliance, and continuous improvement in meeting the needs of our communities.

3. Linked Documents

Estate Inspections Policy and Procedure	Health and Safety Policy	Hoarding Policy
Tenancy Sustainment Policy	Abandonment and Tenancy Fraud Policy	Tenancy Policy
Tenancy Agreements	Tenant Handbook	Corporate Strategy and Customer Feedback Policy
Equity, Diversity and Inclusion Policy	Decants Policy	Dealing with Challenging Customers
Chargeable Repairs Policy	Safeguarding Adults & Safeguarding Children's Policies	Damp and Mould Policy
Electrical Safety Policy	Gas Safety Policy	Lone working Policy

4. Legal and Regulatory Compliance

- Government Regulatory Consumer Standards
  - Safety and Quality Standard
  - Tenancy Standard
  - Neighbourhood and Community Standard
  - Transparency, Influence and Accountability Standard
- Tenant Satisfaction Measures
- Housing Ombudsman code

5. Policy Detail

5.1 Introduction and scope

Tenancy audits are planned, scheduled home visits undertaken to assess the condition of our homes and to engage with customers to identify any repairs, maintenance issues, or actions required. Audits also provide an opportunity to identify any support needs and, where appropriate, make referrals to help customers sustain their tenancy.

Tenancy audits form a key part of Brighter Places' approach to compliance monitoring and early intervention. They support the prevention of disrepair, the maintenance of agreed property standards, and the timely provision of proactive support to customers.

5.2. Roles and responsibilities

Housing Officers (HO's) are responsible for managing the process and completion of Tenancy Audits. They also action and refer customers further support or assistance within the business as required.

Audits are reviewed with HO's at their 1-2-1's with their line Manager

5.3 Policy detail

Housing Officers, with relevant support from Housing Managers where needed, organise and carry out their own Tenancy Audits.

HO's aim to complete 100 visit each year and the completion of them are monitored by their Line Manager. To manage workloads for the team this will be made up of 1 or 2 high risk cases and 1 or 2 medium or low risk cases per week.

Identifying properties for audit can be by internal referral or using relevant IT systems and processes to identify properties that need prioritisation to be visited.

Reasons where and how a particular tenancy may be prioritised for a Tenancy Audit include but are not limited to

Risk Category	Criteria	Examples
High Risk	Significant risks to safety, tenancy sustainment, or legal compliance.	• Hoarding / severe property condition • Tenancy fraud / cuckooing concerns • Damp, mould, or disrepair indicators • Failed access for compliance (gas, electrical, etc.) • Frequent or unusual repair patterns Safeguarding concerns • High rent arrears / irregular payments • ASB reports • Property flagged for disposal/decant
Medium Risk	Issues that may escalate if not monitored.	• Low-level ASB reports • Minor property condition concerns • Customer repeatedly calling Customer Services • No repair reports for long periods • Gaps in critical household data
Low Risk	Stable tenancies with no recent concerns.	• No concerns with repair issues • Good payment history • Missing household and EDI data • Engagement with MyPlace • Access secured when requested

HO's will usually contact the customer aiming to give a minimum of 5 working days' notice of a Tenancy Audit, and will communicate with the customer by email, telephone or letter to arrange their visit.

When arranging their visit, the HO will identify any specific requirements that will be needed for the visit.

Examples include:

- Check if there are any pets in the home, and ask that they be kept safe and at no risk to the HO at the visit.

- Remind the customer that we respectfully request they or their visitors do not smoke whilst we are in their home.
- Check for any UDC's and arrange Visit in Pairs if required
- Check availability of the family where possible, for example working hours, children travel to and from school etc
- The HO will ensure that they consider any equity and diversity requirements by ensuring they take reasonable steps to be aware of any faith needs or requests, for example, removal of shoes before accessing the property or not shaking hands

If the HO needs to visit and access the property more urgently, then this can be done without notice, and the customer advised when on site that a Tenancy Audit is being completed.

5.4 Undertaking the Audit

The Housing Officers use an IT system or equivalent to complete Tenancy Audits. At the time of writing this policy this is Fast Fields.

When in the customer's home, the HO will inspect all rooms, and any other internal or external spaces. This includes garages, parking spaces, front and back gardens. It does not include climbing ladders to access lofts, or roof access via skylights.

HO's will note the condition of the property, and action any areas of note. These can be, but are not limited to:

- Reporting repairs – Where repairs are identified, the HO must raise the repair directly in line with BP repairs procedures, regardless of whether the customer agrees to or declines to report the issue themselves. This ensures Brighter Places meets its legal duty to respond promptly to repair obligations.
- Advice and/or referrals to support or specialist agencies
- Advice and/or internal referrals to other departments in Brighter Places, e.g. Tenancy Sustainment
- Advice on Succession, Mutual Exchange, ways to move homes internally at Brighter Places or via the Local Authority, or other tenancy matters
- Raising a formal complaint with the Feedback team if required

When at the property the Housing Officer will check with our customer (s):

- The household details, including, all EDI data, and personal contact data we hold for the customer and their household is correct
- That the customer is who they state they are – checking identity and Right to Remain via photographic evidence (Passport / drivers licence) - upload copies of these documents to the tenancy section of our IT system.
- That the customer does not require support from any other means, either via Brighter Places or another agency.

- That if the customer owes us money, either for rent or any other sundry debt, that and agreements in place to address any outstanding amount – a referral to Tenancy Sustainment and / or the Income team may be made
- That the property is the correct size for the customer and their family
- That the customer and their family are happy living in their home
- That the customer uses MyPlace and help them to register if needed.

When at the property the Housing Officer will check, act and take photographs of:

- Any concerns about the overall decorative condition of the property.
- Any Health and Safety concerns must be actioned whilst on site – for example concerns over faulty electrics or gas leak.
- Obvious repairs – to be raised with Brighter Places by the HO or the customer – the HO will give recharge details if any repairs are as a result of deliberate damage or wilful neglect.
- Front and Rear garden, garage as part of the tenancy, – clean and well maintained - *to note* communal areas are checked using the Estate Inspection Policy and Procedure.
- Any road issues, for example the street lighting- advice to be given to the customer on how to report to the local authority.
- Rubbish (fly tipping) left inside or outside the property – advice to customer on how they can get their items removed.

On returning to the office, the HO, will update any changes to customer information and note when the Tenancy Audit was carried out by updating the UDC and adding an end date for the next audit in 5 years time. Photographs that are marked with the date of visit and by which officer are to be uploaded onto our IT system.

5.5 Access Refusal by our Customer

If a customer advises that they do not wish to take part in a tenancy audit, the Housing Officer (HO) will seek to understand the reasons for this and will encourage the customer to engage with the process.

Depending on the individual circumstances of the customer and their tenancy, the HO may decide not to proceed with arranging a tenancy audit visit. This may be appropriate where the customer has had recent contact with the HO or another member of the housing team, no concerns have been identified that require further checks, and the HO is satisfied that the customer understands their tenancy conditions and feels confident to contact Brighter Places if needed.

Where a customer continues to refuse access, and the HO has not recently seen the property, or where there are other reasonable and proportionate grounds for a home visit, the HO may discuss the situation with the Housing Manager. The HO may then

refer the matter to Brighter Places' solicitors to consider whether there are reasonable legal grounds to seek access.

Gaining access through legal means is a last resort and only used where there are concerns relating to the customer's wellbeing, the condition or use of the property, or compliance with the tenancy.

6. Training Requirements

Housing Officers are taught how to carry out Tenancy Audits as part of their induction, and refresher training is available from Housing Managers on request.

7. Monitoring and Review

The ongoing application of this policy is monitored via the Governance Team and Housing Managers to ensure that it remains relevant, up to date and accessible to the relevant audience.

The policy will be reviewed at least every 3 years.

8. Data Protection

Any personal data created, collected, shared or retained in connection with abandonment or tenancy fraud investigations will be processed in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and Brighter Places' Data Protection Policy and Privacy Notices.

In applying this policy, Brighter Places will ensure that:

- Personal data is processed lawfully, fairly and transparently, and only where there is a clear and legitimate purpose connected to tenancy management, fraud prevention, safeguarding, or compliance with legal and regulatory obligations.
- Only relevant and proportionate information is collected and recorded, and data is limited to what is necessary to establish facts and support decision-making.
- Information obtained from third parties (including neighbours, contractors, local authorities, and partner agencies) is handled sensitively and assessed for reliability and relevance before being relied upon.
- Personal data may be shared with appropriate internal teams, local authorities, law enforcement agencies, fraud bodies, or regulators where

lawful and necessary, including for the prevention or detection of crime, recovery of possession, or regulatory reporting.

- Appropriate access controls, security measures, and audit trails are maintained on all systems used to record and store investigation data.
- Personal data is retained only for as long as necessary and in line with Brighter Places' retention schedule, recognising that fraud-related records may need to be retained for evidential, audit, or regulatory purposes.
- Individuals' data protection rights are respected, subject to lawful exemptions that apply in the context of fraud prevention, crime detection, or legal proceedings.

All colleagues involved in abandonment or tenancy fraud investigations must ensure that data protection considerations are embedded throughout the investigation process and must seek advice where there is any uncertainty.

9. Equity, Diversity and Inclusion

Where required, reasonable adjustments will be considered to support colleagues to engage with this policy. Please speak to the policy owner for assistance.

Brighter Places is committed to ensuring that this policy is applied fairly, consistently and without discrimination.

In applying this policy, colleagues must have due regard to the Equality Act 2010 and ensure that decisions relating to suspected abandonment or tenancy fraud are:

- Fair, proportionate and evidence-based, and do not result in unlawful discrimination, either directly or indirectly.
- Sensitive to individual circumstances, including where a tenant or occupier may be vulnerable due to disability, mental or physical health conditions, age, caring responsibilities, language barriers, or other protected characteristics.
- Inclusive and accessible, including consideration of reasonable adjustments to communication, timescales or processes where required to enable engagement with the investigation or review process.
- Informed by safeguarding considerations, particularly where concerns relate to household members who may be at risk, or where absence

or non-occupation may be linked to hospitalisation, care arrangements, domestic abuse, or other complex personal circumstances.

Where vulnerability or protected characteristics are identified, colleagues must ensure these are appropriately considered and, where necessary, seek advice from relevant internal teams before progressing enforcement or legal action.

10. Health and Safety

Customer and Colleague Safety

The health, safety, and wellbeing of our customers and colleagues is of paramount importance to Brighter Places.

Housing Officers are equipped with lone working devices and receive regular and up-to-date health and safety training. This ensures they are aware of potential risks and the appropriate control measures when visiting homes or estates.

Where customers are known, or reasonably assessed, to present a potential risk to themselves or others, this information is clearly recorded on our IT systems through the use of a UDC alert to support effective risk management and colleague safety.

Property Health and Safety

Health and safety compliance checks are carried out regularly within communal areas by Property Inspectors. In addition, Housing Officers undertake routine estate inspections, during which any health and safety concerns identified are recorded and appropriate action is taken.

Housing teams are trained to recognise, record, and report health and safety concerns observed during visits or raised by customers, ensuring issues are addressed promptly.

Any actions arising from tenancy audits are reported to contractors and managed in line with agreed contractual response times to ensure continued compliance with health and safety requirements.

Where damp or mould is identified during a tenancy audit, it is recorded and reported by the Housing Officer at the time of the visit to enable timely investigation and remedial action.

11. Summary Roles and Responsibilities

Activities	Gov	HoH	HM's	Housing Officers	H&S	DofCS	HR
Owner of the policy		X	X				
Monitoring & review of the policy		X	X		X	X	X
Approval of changes to the policy						X	
Responsible for policy implementation			X				X
Addressing issues in the implementation of the policy			X		X		
Version control of live policy	X						
Training of colleagues			X	X			X
Completion of Audits				X			