

Noise Complaints – Self-Assessment Form



This form details our response as a landlord to the Housing Ombudsman's noise complaints self-assessment. This provides Royal Borough of Greenwich's (RBG) required response for how as an organisation we comply with the Housing Ombudsman's recommendations as noted in the [Spotlight Report on Noise Complaints October 2022](#).

Decent Homes

No	Recommendation	Comply:	Evidence, commentary and any explanations
1	The Decent Homes standard should be revised to fully reflect the causes that can result in residents experiencing noise nuisance. By focusing exclusively on external noise, and primarily noise from vehicles or factories, it does not reflect modern living for most residents.	No	The Decent Homes Standard has not been revised to reflect noise nuisance. Soon, we will have a new asset management system, which will allow for noise nuisance data to be captured.

Net zero

No	Recommendation	Comply:	Evidence, commentary and any explanations
2	Landlords should consider their net zero plans for insulation to ensure that the thermal insulation activity planned will also provide noise insulation and will not make any existing noise transference issues worse.	Yes	This will be part of all our net zero and retrofitting works delivery and included in specification.

Void standard

No	Recommendation	Comply:	Evidence, commentary and any explanations
3	<p>Landlords should update their void standard to ensure that:</p> <ul style="list-style-type: none"> carpets are not removed unless they are in a poor state of repair hard flooring is removed when there have been reports of noise linked to the property properties have adequate insulation from transference noise and; anti-vibration mats are fitted into the washing machine space as standard. <p>If landlords assess the condition of the carpets as good, they should ask the prospective tenant if they wish to keep them and if so, to sign a liability waiver.</p>	Partial	<p>We remove carpets in standard voids to allow access to floors to identify any damage or asbestos that needs to be repaired/removed.</p> <p>If hard flooring on a concrete floor is in exceptionally good condition and fitted professionally, we would leave in situ. If not, we would remove for the same reasons as for carpets and to abate the noise nuisance caused to neighbours.</p> <p>We check and repair/replace floorboards as required but do not undertake installation of mitigations for noise transference. Tenants need to get permission to fit hard flooring in flats so we recommend carpet and underlay in all rooms except kitchens & bathrooms (which we tile).</p> <p>We have not considered fitting any matting in washing machine spaces but would need to ensure the kitchen design could allow this to be done.</p>

Good neighbourhood management policy

No	Recommendation	Comply:	Evidence, commentary and any explanations
4	Landlords should have a proactive good neighbourhood management policy, distinct to the ASB policy, with a clear suite of options for maintaining good neighbourhood relationships and a matrix for assessing	No	At present we have an Anti-Social Behaviour (ASB) policy but not a Good Neighbourhood Management Policy. This is something that we are considering and we would include residents in its development.

	<p>which option is the most appropriate. These options should include mediation, information sharing and community building events and, where appropriate, dedicated staffing. This will ensure that low level issues of neighbour friction are dealt with at the appropriate levels and not inappropriately handled as potential ASB.</p> <p>Landlords should engage residents in the development of the good neighbourhood management policy, including residents who have recently raised a formal complaint with the landlord, to assure themselves that it reflects the expectations of residents and will be effective</p>		<p>We have implemented the Tenant Satisfaction Measures from the Social Housing Regulation Bill and in due course will implement the new consumer regulations from the updated consumer standards.</p>
5	<p>Landlords should have a triage methodology for identifying whether a noise report should be handled under the ASB policy or the good neighbourhood management policy. This should include a recognition that the time the noise occurred has a bearing on whether the noise is anti-social in nature.</p> <p>Landlords should provide training on this triage methodology, including regular refresher training and whenever there is staff change.</p>	Partial	<p>Our website provides contact details for our Community Protection Team (CPT) as a route to submit noise complaints. We also have our own triaging process internally and the webforms provide triaging through the questions they ask.</p> <p>As per recommendation 4, we currently don't have a Good Neighbourhood Management Policy.</p>
6	<p>Landlords should give consideration to separating the role responsible for collecting rent from the role handling noise reports to avoid any perception of a conflict of interest and a concern that the resident might get a different service on their noise report than they might do otherwise if they are in arrears.</p>	Yes	<p>These roles are already split into two distinct groups with the Tenancy Enforcement team handling noise complaints between Council tenants and the Tenancy Income team handling rent collection. The Community Protection Team handle statutory noise complaints.</p>

7	Landlords should review the job descriptions of public-facing roles to ensure that the handling of reports under the good neighbourhood management policy is recognised as part of their housing service provision duties	Partial	<p>The team handling statutory noise complaints have had their job descriptions reviewed recently.</p> <p>Job descriptions in Customer Services aren't specific in the services they provide however, as the initial point of contact for noise calls, they have clear processes for obtaining the relevant information to register service requests.</p> <p>As of Q4 2022/23 we do not have a neighbourhood management policy but will consider an equivalent in due course.</p>
8	Landlords have demonstrated the benefits of staff being present on some estates to provide early intervention where noise is reported. However, these resources are often limited and targeted at hotspots. Landlords should review its presence on estates and the data and information that prioritises intervention, to support an effective good neighbourhood strategy.	Partial	<p>We believe early intervention is essential to stop ASB from escalating, as such we have Key Performance Indicators (KPIs) around contact for new reports of ASB. Staff patrol estates and gather evidence based on requests and intelligence from the Tenancy service and Community Protection Team. Our caretakers are well trained and experienced in reporting a wide range of issues including ASB/noise nuisance.</p> <p>As a borough with a large number of estates it is not possible to have staff on every estate simultaneously.</p>

ASB policy

No	Recommendation	Comply:	Evidence, commentary and any explanations
9	ASB policy timescales should be realistic and achievable. Adherence to timescales should form part of governance reporting	Yes	We have clear timescales internally which are reported on with accompanying KPIs to keep targets realistic and manageable. These are monitored as part of regular

			<p>reporting to performance management team meetings and the KPIs are widely circulated. Additional monitoring is carried out by Tenancy Team Leaders as part of their regular one to ones with Tenancy Officers.</p> <p>Each case is managed on an individual basis with violence cases are dealt with as a police matter. We intend to introduce a Customer Charter this year which will provide further detail.</p>
10	Where options for action are included in an ASB policy, there should be clearly set out thresholds when they will be considered and/or when they might be considered inappropriate.	Yes	<p>Most thresholds, including escalation, are defined by appropriate legislation which we follow, i.e. the Community Trigger route for ASB.</p> <p>Tenancy Services and the CPT are currently working to define the thresholds and this work is almost complete.</p>
11	<p>ASB policies should be realistic and practicable. Landlords should review their existing policy for whether it is routinely complied with or whether it is inherently unworkable, particularly in regard to the frequency of updates to residents, the number of stages and the likely outcomes.</p> <p>Landlords should engage residents in the review of the ASB policy, including residents who have recently raised a formal complaint with the landlord, to assure themselves that it reflects the expectations of residents and will be effective.</p>	Partial	<p>The ASB policy is reviewed when prompted by legislation change. Some policies have been reviewed as part of the rent statement process.</p> <p>Tenants and leaseholders will be involved in policy reviews when they take place. When the ASB policy is reviewed next, there are channels that will be used to promote resident engagement in reviewing.</p>

Allocations policy

No	Recommendation	Comply:	Evidence, commentary and any explanations
12	All applications for housing should be assessed for the impact on the existing community and not just those considered to be sensitive.	Partial	<p>Our Allocations Scheme states that in some circumstances the Council is required to assist families responsible for anti-social behaviour or rent arrears because of duties to protect children or to assist vulnerable adults who are homeless. In most cases the statutory duty will not be met through provision of Council or Housing Association accommodation. Any decisions about rehousing in such circumstances will take into account the need to protect the wider community from anti-social behaviour and to allow existing tenants to enjoy peace and quiet in their homes.</p> <p>The above is operated for those in that category only. Supporting documentary evidence is considered, usually by a Panel, to reach a decision on rehousing.</p>
13	When considering housing applications from families or households with multiple occupants, consideration should be given to the suitability of allocating properties above ground floor, where previous reports of noise nuisance (whether upheld or not) have been made and whether any mitigations can be made to the home.	Yes	These factors can result in a Sensitive Let being made.
14	New tenancy agreements for flats above ground floor should include clauses that hard flooring is not permitted.	Partial	Our tenancy agreement allows for hard wood flooring, with permission; however, we are considering whether to change this. The tenancy agreement refers to noise not being loud enough to annoy other people and notes flooring within potential causes.

Multi-agency relationships

No	Recommendation	Comply:	Evidence, commentary and any explanations
15	Landlords will often need to work with other agencies, including the police and environmental health, when responding to noise reports, however the strength of those relationships are inconsistent. Landlords should consider the service level agreements they have in place with different bodies and their effectiveness, and whether roles and responsibilities are clear.	Yes	<p>Our Dealing with Anti-Social Behaviour booklet, which is currently being reviewed, provides broad details to residents of who the Council may work with during the process.</p> <p>We have a process in place with the police for disclosure and sharing of information. We work with:</p> <ul style="list-style-type: none"> • Local Safer Neighbourhood Teams and can make referrals to multi-agency panels. Service Level Agreements are being worked on and near completion. • Problem in Premises and High Harm panels meet monthly. • There are weekly Integrated Enforcement operational calls which is an effective tool and unique to Greenwich. <p>We are in the process of developing a service level agreement between our Tenancy Enforcement Team and Community Protection Team.</p>

Data, record keeping and information sharing

No	Recommendation	Comply:	Evidence, commentary and any explanations
16	Local authorities should ensure that information shared relating to an applicant's suitability for a vacant home is substantial enough to support any requirements relating to sensitive lettings. Sharing information with housing associations to inform allocations is a lawful basis for processing data. If it is not possible to provide direct access to a housing register to facilitate this, an appropriate download of relevant data should be provided to housing associations.	Yes	<p>Our allocations scheme states the information that applicants provide may be personal and sensitive as defined under the Data Protection Act 2018. An initial assessment of the application and potential involvement of the Case Review Panel aim to ensure all information needed to decide on lettings is gathered. This information is gathered Data will only be shared with third parties with the applicant's consent and then only for the purposes of assisting with re-housing. Applicants have the right to see the information held regarding their application. Our Housing Register form explains how data will be shared and requests customer consent to share.</p> <p>A nomination form and appropriate details are sent to RPs at the point of a potential offer of accommodation.</p>
17	Databases should align noise reports to both the person the report has been made against and the address the report has been made against. Where the investigation of the report concludes that it is the nature of the address, rather than the person occupying it, that is the reason the noise is occurring, this should be captured on the databases to ensure that the noise report is aligned to the causation.	Partial	The CPT database captures the required information although sound insulation was noted as an ongoing issue. Where the issue is a sound insulation issue with the property itself this can be a challenge as the buildings would have met regulations when built.
18	Landlords should consider their current approach to retaining the evidence of noise that a resident submits and satisfy themselves it is sufficiently accurate and robust to ensure that they cannot lose the evidence provided. Due regard should be given to the	Yes	The electronic database used to store information is in line with GDPR and the Council's retention policy.

	requirements of GDPR for the retention and processing of data.		
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Respect

No	Recommendation	Comply:	Evidence, commentary and any explanations
19	Landlords should ensure the tone of communication does not result in perceptions of bias against, or being dismissive of, the resident reporting noise.	Yes	Our standard letters to residents have been reviewed for tone. We have mandatory unconscious bias training requirement for staff in place. All staff are trained on relevant legislation and adopt a conciliatory, even-handed approach at all times.
20	Landlords should begin preparing for the Access to Information Scheme and communicate this to staff in emphasising the need for professional courtesy and respect for residents in internal and external communication.	N/A	The Access to Information Scheme does not apply to local authorities.

Starting the tenancy

No	Recommendation	Comply:	Evidence, commentary and any explanations
21	Landlords should provide information leaflets on 'how to be a good neighbour' as standard with the new tenancy induction pack, especially on estates where there have been ASB issues previously or where sensitive lettings policies are in place.	Partial	Our Tenancy Agreement states responsibilities for tenants to ensure good behaviour in their home and neighbourhood as well defining anti-social behaviour and providing a list of 'must nots'. We are considering producing an additional leaflet focusing on being a good neighbour to supplement this.

Existing tenancies

No	Recommendation	Comply:	Evidence, commentary and any explanations
22	For existing tenancy agreements where hard flooring is only permitted with permission and/or with conditions (such as appropriate underlay or that permission will be rescinded if a noise report is made), if a noise report is made, those clauses should be inspected against and enforced.	Partial	Our Permission for Alterations & Improvements Policy states tenants need to get our written permission before installing laminate flooring, or any other hard flooring, including tiles and wood. Permission will only be granted where the flooring is to be installed to our guidelines, due to the potential noise nuisance caused by inadequate insulation.
23	For existing tenancies where carpets were removed and/or hard flooring is present, the landlord should signpost residents where appropriate to funding for carpets and rugs.	Yes	When we can't resolve a noise case, funding or signposting for carpets and rugs is considered on an individual basis. Where carpets were removed as parts of the voids process signposting to funding for carpets and rugs is picked up by the Welfare Reform Team as part of the moving in process for prospective tenants.

Handling a noise report

No	Recommendation	Comply:	Evidence, commentary and any explanations
24	Landlords should assure themselves that it is clear to residents when and how to report noise nuisance to them, with a full range of accessible and inclusive options available for residents to report noise.	Yes	We have information on our website including a booklet and service standards on noise nuisance. We share information with residents through a regular newsletter, face to face discussions, engagement forums and through the welcome pack. We are considering how to further develop promotion with focus on the Noise app used to submit noise evidence.

25	Residents must be clearly told if their noise report is being handled within the good neighbourhood management policy or is considered to be ASB.	Partial	We don't have a Good Neighbourhood Management Policy at present. If CPT don't define the noise as a statutory nuisance then Tenancy Enforcement inform the person complaining that it will be treated as an ASB case.
26	If landlords are aware there is going to be a delay in addressing a noise report and the timescales provided to the resident will not be met, explain this at the earliest available opportunity and provide revised timescales.	Partial	We have clear timescales within the anti-social behaviour booklet. There is a need to review what happens when timescales can't be met to ascertain compliance.
27	If a policy stipulates that certain options must be considered when responding to a noise report, it is essential for the landlord to demonstrate consideration of that option and this must be documented, even if the decision is not to use that option to enable the landlord to answer any subsequent complaint. The decision should be clearly communicated to the complainant including the reasons why.	Yes	Our Service Standards state that we will consider the full range of interventions, including warnings, criminal and civil legal actions that may be taken against the individual(s) or groups causing the problem. How decisions are recorded depends on the case - more vulnerable adults we have more detailed information. We generally tell residents what we can do rather than what we can't but would respond to a question on this if asked.
28	Noise recordings submitted by residents should always be listened to by the case handler to ensure robust investigations that are informed by a true understanding of the noise being reported.	Yes	The Noise application ensures electronic submissions are received and makes recordings evidential, these are always listened to by case handlers. Paper diaries are also available but the Noise app is communicated as the best way to evidence noise.
29	Landlords should review the current provision of staff training, supervision, guidance and support and whether this is conducive to ensuring high standard of customer care. Particular consideration should be given to how confident and equipped staff feel in having difficult conversations, including managing expectations and delivering unwelcome news	Yes	Our mandatory customer service training covers included having difficult conversations, managing expectations and how to deliver news.. This is monitored by Team Leaders at one to one meetings and learning from complaints made. We are considering whether conducting a gap analysis and creating a mandatory training plan for people handling noise complaints would be beneficial.

30	Line managers should be aware of an individual's caseload and the significant decisions taken in those cases and, wherever possible, handover meetings should be conducted where the ownership of a noise report is transferred.	Yes	<p>Team management processes are in place for CPT and kept under review. Job descriptions have been reviewed recently and ensure appropriate responsibilities to the relevant role levels. Shift patterns allow for handover and ensuring case information is kept consistent for those involved.</p> <p>In Tenancy Services, handover will always happen wherever this is possible.</p>
31	Landlords should ensure that information is provided as standard to residents who make noise reports about their right to make a complaint if they are dissatisfied with the landlord's proposal for handling the situation or the actions taken by the landlord to address the situation.	Yes	<p>Our Dealing with Anti-Social Behaviour booklet, which is currently being updated, states that residents have the right to complain if they believe they have not received a good service. Our complaints procedure ensures that we will deal with their complaint effectively and promptly.</p> <p>The booklet is provided to all residents who make a noise report, this is currently on hold while it is being reviewed. In the interim, residents are directly informed of their right and how to complain.</p>
32	The member of staff who has been handling the noise report that is being complained about should never be allocated the complaint to investigate.	Yes	<p>Our Housing Complaints Policy (2022) states that "The complaint handler will take measures to address any actual or perceived conflict of interest".</p> <p>Our Housing & Safer Communities Complaints Procedure ensures that a complaint about a member of staff is always investigated by the line manager or a more senior officer.</p>