

# Business Optimisation / Opportunity Outline

## Grainger Trust – Know Your Customer

May 2024

## Opportunity Name: Grainger Trust: Know your Customer

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### Problem Statement

On 1st April 2024, the Regulator for Social Housing's new Consumer Regulation regime came into effect, requiring Grainger Trust (GT) to evidence that we meet standards regarding Know Your Customer (KYC). This new legislation enables the Regulator to proactively inspect compliance, including OFSTED-style short notice inspections and public announcement of shortfalls.

GT was already subject to the Regulator's Consumer Standards, but previously this would only currently be investigated (due to our size) if there was evidence of harm caused to a tenant through non-compliance. Due to the vulnerable nature of many of our residents, a lack of accurate and interrogable customer data could mean our services are not accounting for diverse needs.

GT are expecting to exceed the size threshold of 1,000 units this financial year, this requires GT to notify the Regulator at which point we are eligible for inspection. Grainger do hold data on KYC on shared drives, however this is mixture of paper based and secure excel data, we are not currently able to report on the information or use it to inform the delivery of our services and protect tenants, so we would be unable to meet this Specific Expectation as part of the Regulation.

Following a review by Altair for the GT Board of the key regulatory requirements that GT need to prepare/comply with, the consumer regulations was highlighted as a one the top 3 areas of priority. GT Board (and GPLC) will require assurance that we remain compliant with these regulations.

### Business Objective

To store customer data against a customer record with sensitive PII data specific to the requirements for Grainger Trust:

#### 2.1 Diverse needs

2.1.1 Registered providers must use relevant information and data to:

- a) understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs; and
- b) assess whether their housing and landlord services deliver fair and equitable outcomes for tenants.

2.1.2 Registered providers must ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants.

2.1.3 Registered providers must ensure that landlord services are accessible, and that the accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online landlord services if required.

2.1.4 Registered providers must allow tenants and prospective tenants to be supported by a representative or advocate in interactions about landlord services.

## 2.2 Engagement with tenants

2.2.1 Registered providers must give tenants a wide range of meaningful opportunities to influence and scrutinise their landlord's strategies, policies and services. This includes in relation to the neighbourhood where applicable.

2.2.2 Registered providers must assist tenants who wish to implement tenant-led activities to influence and scrutinise their landlord's strategies, policies and services. This includes in relation to the neighbourhood where applicable.

2.2.3 Registered providers must provide accessible support that meets the diverse needs of tenants so they can engage with the opportunities in 2.2.1 and 2.2.2.

## 2.1 Allocations and lettings

2.1.3 Registered providers must develop and deliver services that seek to address under-occupation and overcrowding in their homes. These services should be focused on the needs of tenants.

2.1.4 Registered providers must take action to prevent and tackle tenancy fraud.

The Data should be stored in an electronic format, reportable so the customer insight can be obtained, and access restricted to the appropriate users.

### Business Outcome

Customer data stored against a customer record in a secure system, the data must be extractable through insight reporting to provide customer support and improvements.

Reports to be created to enable the Grainger Trust Team to demonstrate meeting the Consumer Regulations regulatory requirements to KYC as of 1st April 2024.

### Benefits

The current process for storing and maintaining GT data is manual, the use of manually completed Word forms and excel is resource heavy. Reporting on customer and portfolio data is also time consuming and requires assistance to collate and format data. Customer is currently extracted from these formats manually when a resident needs support in individual cases, but we are missing opportunities to support customers who struggle to reach out because of their diverse needs – poor English, learning disabilities, anxiety etc. With the growth of the portfolio, systemising storage and insight will allow the portfolio to grow without the need to accommodate additional personnel to manage the additional data management aspect.

Also whilst a regulatory requirement for GT, the business outcomes would apply/support similar initiatives to KYC all customers and aligns to ambitions for a Single View of the Customer.

### Value Outline/ Understanding

The ability to provide improved customer care for vulnerable customers within the Grainger Trust Portfolio, the data and insight will offer valuable information to not only meet regulatory requirements but enhance customer care and control of the portfolio.

Systemising the customer data will also prolong the requirement to increase resource as the portfolio steadily grows.

## Is this a compliance/ regulatory impact for consideration

Yes, new legislation on 1st April 2024 requires Grainger to evidence and demonstrate that they meet the KYC requirements to the regulator. In addition, the portfolio will exceed the 1000 unit threshold requiring Grainger trust to register this with the regulator, meaning we will be inspected at some point after FY24.

## Risks

Grainger do hold some data on KYC on shared drives, however this is paper and excel based, we are not able to report on the information, or easily demonstrate it is all up to date. This puts Grainger Trust at risk should we be inspected, which we are expecting due to the increase in units over the 1000 threshold.

## Additional Information

Please submit your completed form to the Business Optimisation Team.

**Thank you**