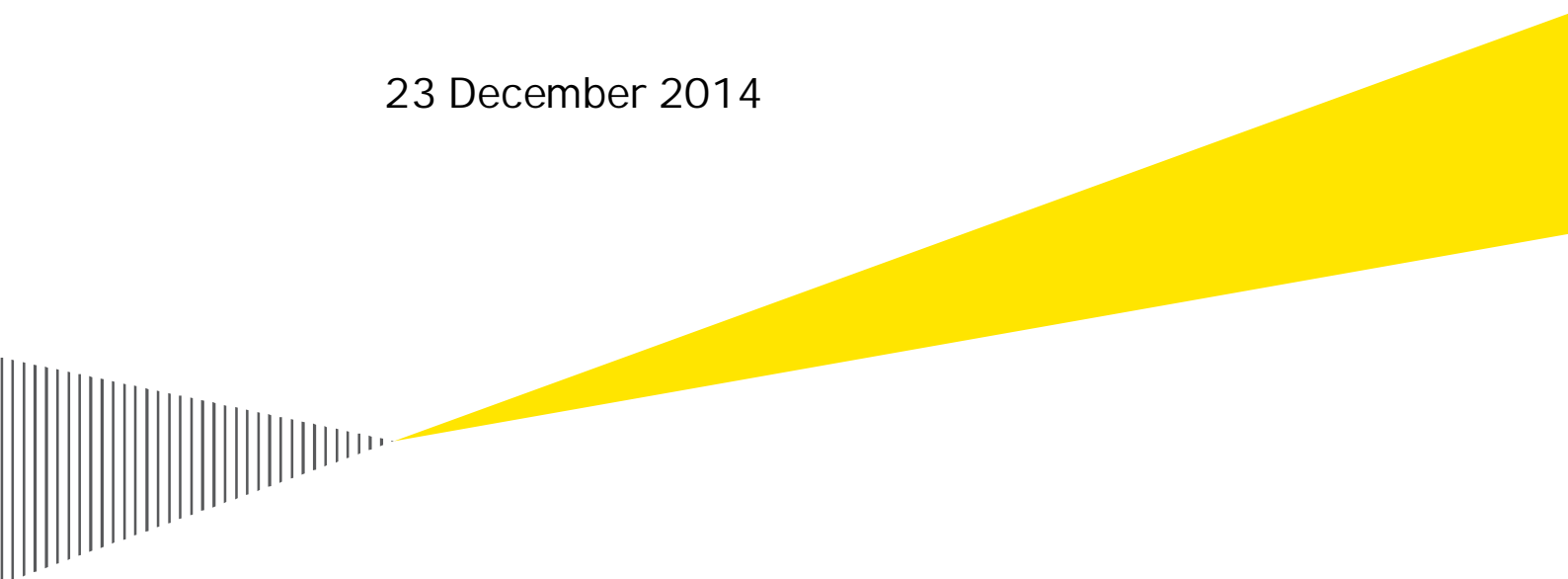


Independent review commissioned by the Christchurch City Council Housing Unit.

23 December 2014



Building a better
working world

Contents

Part 1 – Executive summary.....	1
Part 2 – Findings and observations	4
Appendix One - Procedures performed.....	13
Appendix Two - Glossary	14
Appendix Three – Summary of complaints – MacGibbon Place	15

Release notice

Ernst & Young (EY) was engaged on the instructions of Christchurch City Council to provide an independent review,¹ in accordance with the engagement agreement dated 22 October 2014 including the General Terms and Conditions. The results of EY's work, including any assumptions and qualifications made in preparing the report, are set out in EY's report dated 12 December 2014 ("Report"). You should read the Report in its entirety. A reference to the Report includes any part of the Report. Unless otherwise agreed in writing with EY, access to the Report is made only on the following basis and in either accessing the Report or obtaining a copy of the Report the recipient agrees to the following terms:

1. The Report has been prepared for Christchurch City Council's use only.
2. The Report may not be used or relied upon by any other party without the prior written consent of EY.
3. EY disclaims all liability in relation to any other party who seeks to rely upon the Report or any of its contents.
4. EY has acted in accordance with the instructions of Christchurch City Council in conducting its work and preparing the Report. EY has not been engaged to act, and has not acted, as advisor to any other party. EY makes no representations as to the appropriateness, accuracy or completeness of the Report for any other party's purposes.
5. No reliance may be placed upon the Report or any of its contents by any recipient of the Report for any purpose and any party receiving a copy of the Report must make and rely on their own enquiries in relation to the issues to which the Report relates, the contents of the Report and all matters arising from or relating to or in any way connected with the Report or its contents.
6. No duty of care is owed by EY to any recipient of the Report in respect of any use that the recipient may make of the Report.
7. EY disclaim all liability, and take no responsibility, for any document issued by any other party in connection with the Report.
8. No claim or demand or any actions or proceedings may be brought against EY arising from or connected with the contents of the Report or the provision of the Report to any recipient. EY will be released and forever discharged from any such claims, demands, actions or proceedings.
9. To the fullest extent permitted by law, the recipient of the Report shall be liable for all claims, demands, actions, proceedings, costs, expenses, loss, damage and liability made against or brought against or incurred by EY arising from or connected with the Report, the contents of the Report or the provision of the Report to the recipient.
10. The material contained in the Report, including EY logo, is copyright and copyright in the Report itself vests in the Christchurch City Council. The Report, including the EY logo, cannot be altered without prior written permission.

¹ This is a factual findings review and not a review in accordance with External Reporting Board Standard RS-1, which relates to reviews of historical financial statements.

Part 1 – Executive summary

1.1 Background

Christchurch City Council (“CCC”) manages a portfolio of more than 2,640² residential units across Christchurch. This accommodation is provided to tenants who meet certain wide ranging social housing needs criteria. The accommodation is, predominantly, single bedroom units with a small number of multiple bedroom units.

Day to day management of the entire CCC portfolio falls to the City Housing Unit, a CCC team. CCC is bound by the provisions of the Residential Tenancy Act 1986 (“the Act”).

MacGibbon Place is a CCC social housing complex located in the suburb of Spreydon. The complex contains 36 units and was built in 1961, making it slightly older than the median age for CCC social housing complexes. All units at MacGibbon Place are single bedroom units.

On the 20th July 2013, a violent assault occurred in the vicinity of a unit at MacGibbon Place (“the incident”), which was widely reported in local and national media. The victim died at the scene. The offender admitted the attack, was arrested, and subsequently convicted. He is currently serving a life sentence with a minimum non-parole period of ten years.

Both the victim and the offender were placed as tenants at MacGibbon Place in 2007. They occupied units that shared a common wall, in the middle of a block of four units.

In the years between 2007 and the incident, CCC Tenancy Advisors had received complaints from both the victim and the offender about antisocial behaviour by the other person. These complaints were similar in nature to many of the other complaints that CCC Tenancy Advisors deal with on a day to day basis. None of these complaints disclosed any threat of violence or could reasonably be interpreted as foreshadowing the attack.

Following the incident, City Housing Unit undertook an internal review of the events leading up to the incident and concluded that all the housing advisors acted in a manner consistent with the Residential Tenancies Act 1986 and that CCC could not have foreseen the incident.

Subsequently it was decided to commission an independent review of the CCC Housing Unit operations policies and procedures and the current tenancy management practices at CCC Housing Unit as they relate to the incident.

In accordance with our engagement letter, we have been appointed to provide an independent review of the matters set out in 1.2 below.

1.2 Scope of independent review

The scope of the independent review was to review the following:

- Housing Unit Operations policies and procedures and the tenancy management practices in operation leading up to and at the time relating to the incident and determine whether they were appropriate; and
- Any other issues that EY or the Chief Operating Officer of the council considers relate to, or arise out of, the above.

² Prior to the Canterbury earthquakes

1.3 Restrictions and limitations

We draw attention to the limitations inherent in this report.

- We were not required to, and did not undertake an audit in accordance with New Zealand Auditing Standards. Consequently, no assurance has been expressed.
- Our review covered the period 1 February 2011 to 30 September 2013 (the "period"). Any events or transactions that occurred outside the period, which we refer to in this report, have been included for information purposes only.
- The scope of our work was limited to review of documentation and information made available to us and specific enquiries undertaken to pursue our mandate. As we were not engaged to perform an audit, we have not verified the authenticity or validity of the documentation made available to us. Unless expressly stated, we have not sought to verify whether all information provided to us verbally is credible or truthful. Interviews have not been conducted under oath.
- Given the sensitive nature of the review we have avoided identifying the names of third parties where this is not necessary to achieve the objectives of the review.
- If additional or new information is brought to our attention subsequent to the date of this report which would affect our findings, we reserve the right to amend our findings accordingly.

1.4 Summary of findings and observations

The following provides a summary of our findings and observations. Further detail can be found in Part 2.

1. CCC, The Housing Unit and the Tenancy Advisor could not have foreseen that the tenant conflict at MacGibbon Place would have resulted in a violent assault causing death. The Tenancy Advisor at the time of the incident took all practical steps to manage and defuse the ongoing tenant conflict that was required of them as per the RTA and CCC policy and procedures in place leading up to and at the time of the incident.
2. The conflicts documented between the offender and the victim was not uncommon and represents the frequency and type of tenant conflict dealt with on a daily basis by the Housing Unit. The offender and victim were not listed on the City Housing Caution Listing.
3. The earthquakes had and continue to impact the City Housing Unit team, the housing assets and the tenant community. During the time leading up to the incident, the City Housing Unit was short of Tenancy Advisors, the Tenancy Advisors had larger portfolios to manage than what would be deemed optimal. The tenants in many cases were being moved from their homes and placed in new complexes which brought about a new set of tenant issues to be dealt with by the unit. It must be recognized this was a stressful and demanding time for all stakeholders.
4. Policies and procedures to govern and guide the City Housing Unit operations and team did not specifically deal with anti-social behaviour and how Tenancy Advisors should be dealing informally and formally with tenant conflict leading up to and at the time of the incident. Given the range of policies and the limitation of some component parts of the policies, the experience of the tenant advisors became and continues to be a critical input into delivering good tenant management practices.
5. The role of the Tenancy Advisor at CCC extends well beyond the requirements of the Residential Tenancy Act into a role of pastoral care of the tenants. The housing team at the time of the incident was not trained in all aspects of the required role nor was there a consistent view on what the boundaries of the role were. Reliance on the team's collective

experience was and continues to be key.

6. Current systems make it difficult for Tenancy Advisors to capture notes and information in one central place. There is a wide variation of detail captured by the various Tenancy Advisors across their portfolios. Tenancy Advisors do not have mobile technology so any notes required whilst in the field need to be transferred into SAP or TRIM upon their return.
7. Leading up to and at the time of the incident, there was an over reliance on the experience and skills Tenancy Advisors bring to CCC. Minimal training was provided to the team to ensure they are equipped to deliver on their pastoral care role over and above the tenancy management requirements.
8. Tenant needs, interactions, complaints and issues are channeled through the CCC call centre. This call centre is the channel for all inquiries to Council. Call centre staff are not trained to triage and take calls from tenants. Call centre staff do not have access to SAP notes and the process is reliant on Tenancy Advisors to replicate messages in SAP or save email messages to TRIM.
9. Relocation of tenants is not done as a matter of course and will only be considered if tenants make a request to be moved. Both the offender and the victim did not request to be relocated.
10. There is inadequate monitoring of the movement of Tenancy Advisors. If there is an incident, the Housing Unit may not know where the Tenancy Advisor is. There is no formal risk assessment undertaken before Tenancy Advisors visits tenant's homes, and informal assessment of the potential risks are reliant on the Tenancy Advisors experience, the Tenancy Advisor accessing the Anti-Social Behaviour database (and the integrity of that data) and the informal sharing of information about potential problems amongst the team.

Please note, these findings relate to the time period leading up to and at the time of the incident only. These findings should not be read and understood to be reflective of the current Housing Unit culture and practices.



Ernst & Young Limited
Joanne Ogg
Director

Part 2 – Findings and observations

2.1 Housing Unit Operations policies and procedures

2.1.1 Policies and procedures

Background

The review looked to the policy documents in place at the time of the incident to consider whether the documented policy and procedures were appropriate.

The City Housing operational portal ("the portal") is an electronic repository for policy and procedure documents relating to the City Housing operations. The portal was launched on 21 December 2012. The policies and procedures currently in effect and referred to below are taken from the portal, and discussed below.

All Tenancy Advisors have access to documents on the portal. In addition to setting out policies and procedures, the portal provides hypertext links to templates for core documents, for example the various notices that Tenancy Advisors might issue to tenants under the provisions of the Act.

The procedures reviewed included Tenancy Management. This was in force at the time of the incident and remains in force. The overview of this procedure states that

"The following procedures specify the responsibilities and actions of Housing Officers acting as agents for the landlord – City Housing"

The procedure deals with a range of issues relating to the management of tenancies, The procedure for dealing with inter-tenant disputes is produced here in its entirety:

"Disputes

Tenant disputes are varied and can involve neighbour problems, neighbourhood problems and crime. Common issues range from noise, parking, intimidation and bullying and misuse of communal areas/property.

In order to resolve these types of disputes the following options are available for Housing Officers:

- *Informal Resolution - discussing situation with all parties involved. Please ensure any informal resolution is recorded fully in SAP notes.*
- *Online referral submitted to Mediation Services who provide a Community Mediation Service for conflict prevention. Housing Officers must obtain the permission of all persons involved in the dispute before submitting any requests to Mediation Services.*
- *Formal proceedings instigated – Notice of Remedy: Disturbance of Peace and Enjoyment issued. If notice is breached discuss with Team Leader Housing Operations before taking any further action.*

The portal was introduced after the date that the victim and offender were first referred for formal mediation.

The Tenancy Management procedures provide detailed steps for dealing with other matters, including, but not limited to,

- Entry without notice.
- Gardens.
- Deceased Tenants.
- Non Occupation of CCC Unit.

Following the incident the City Housing Unit introduced - Anti Social Behaviour Procedures. This includes detailed procedures for Tenancy Advisors responding to complaints of anti-social behaviour including:

- How complaints received are to be assessed and recorded.
- When and how interviews with complainants and the subject of the complaint are to be conducted
- Assessing the risk of the interview.
- Further courses of action.

Findings

1. The portal provides Tenancy Advisors with a number of procedure documents to guide the Tenancy Advisors in the execution of their duties.
2. The procedure for dealing with inter-tenant disputes (other than anti-social behaviours) lacked detail.
3. There is no procedure to guide Tenancy Advisors on how they conduct informal resolution of tenancy disputes, and no guidance on when a matter is suitable for informal resolution or requires formal mediation. The decision to refer a matter to formal mediation rests with the Tenancy Advisor. We do note there is a link to mediation and Tenancy Tribunal details in the portal.
4. Procedures for Tenancy Advisors responding specifically to complaints of anti-social behaviour were not in place leading up to or at the time of the incident. Section 56 notices were the key remedy used.

2.2 Housing Unit tenancy management practices

2.2.1 Role and duties of a Tenancy Advisor

Background

During the period under review, the role of Housing Officer was renamed Tenancy Advisor. There is no difference in the substance of these positions. The name Tenancy Advisor is used in this report for both positions.

The role of a Tenancy Advisor includes discharging the duties imposed on Christchurch City Council as a Landlord under the Residential Tenancies Act 1986. The duties within the Act include, but are not limited to:

- Providing and maintaining the property in a reasonable condition.
- Allow the tenant quiet enjoyment of the premises.
- Complying with building, health and safety standards that apply to the property.

The Act does not require landlords to mediate disputes between tenants, but in section 38(2) requires that *"The landlord shall not cause or permit any interference with the reasonable peace, comfort, or privacy of the tenant in the use of the premises by the tenant."*

CCC Tenancy Advisors report to a Housing Operations Team Leader, the role of Tenancy Advisor as it is currently defined has the following primary responsibilities:

- Delivering tenancy services to City Housing customers, working from various locations as required in accordance with the City Housing Service Delivery Plan.
- Facilitating the provision of tenant welfare services.
- Assisting with the facilitation / delivery of reactive and programmed maintenance
- Contributing to the achievements of Community Support Unit outcomes.
- Responding to the changing needs of the City Housing Team, and Council, Performing other tasks as reasonably required.
- Adding value to the present and future citizens of Christchurch by: Ensuring safe, accessible and affordable social housing is available to people on low incomes including elderly persons and people with disabilities.

Further information on the role and the accountabilities of a Tenancy Advisor are given in "Position Description – Tenancy Advisor" included at Appendix Three

In June 2007 CCC released its Social Housing Strategy ("the Strategy") which identified seven goals. The key objectives for some of these goals touch on the role of Tenancy Advisors, specifically:

- Under the heading "Partnership" - "Foster sustainable tenancies and tenant well-being by lining tenants with community support services".
- Under the heading "Compatibility and Integration" - *"To continue to develop and implement processes which access tenant needs and provide healthy living environments for tenants"*.
- *Also under the heading "Compatibility and Integration" Continue to identify and facilitate links to support services to enhance tenant well-being"*.

Findings

1. There are differing views within the management and staff at the City Housing Team on the extent of the role of a Tenancy Advisor. Those spoken to in the course of this review agree the role includes the basic duties imposed by the Act. All agree that it includes some additional duties beyond those set out in the Act, but disagree on the extent of these additional duties.
2. At its most basic the role of Tenancy Advisor is to manage the tenants, rents and dealing with complaints.

3. The role of Tenancy Advisor specifically includes an element of pastoral care in “facilitating the provision of tenant welfare services”. This element of the role requires a different skill set and capability yet has not been supported through learning and development activities to ensure the Tenancy Advisors are equipped to perform this role.

2.2.2 Tenancy management systems

Background

City Housing Unit staff and management use a variety of databases, electronic file systems and other electronic records (including email) to manage the tenancies within their portfolios.

Management of rent payments and financial details of tenancies is managed in a SAP database (“SAP”). This database is also used for the recording of notes regarding interactions between tenants and Tenancy Advisors. The process for noting that correspondence has been sent to, or received from, a tenant in SAP notes is not automated. It is reliant on the Tenancy Advisor manually entering the information.

Documents relating to tenancies are stored in an electronic storages system known as TRIM, with documents linked by unique tenant numbers. Copies of letters to tenants are saved to TRIM by the creator of the document (usually the Tenancy Advisor). This system is not automated and letters may be sent and not recorded in TRIM.

Notes of annual inspections are stored in what is referred to as the “Tenancy Database”. The Tenancy Database is, in fact, not a database but rather an electronic file structure that allocates an electronic folder for each unit, within each complex. The Tenancy Database holds only the most recent version of the inspection report, previous versions being overwritten or discarded. Older inspection reports may be stored within TRIM.

Other documents and correspondence reading tenancy issues may reside on individual computers or within the email system. This may include complaints received by the CCC call centre staff and emailed to Tenancy Advisors.

Subsequent to the incident an Anti-Social Behaviour Database (“ASB database”) was established by the Central Tenancy Advisor to record and manage incidents of anti-social behaviour within the CCC complexes. This database is maintained by the Central Tenancy Advisor and information pertaining to particular tenants shared with the relevant Tenancy Advisor.

Findings

1. There is no one central system for the management of tenancies or the recording of interactions with tenants. Instead, information is spread across a variety of databases and electronic storage systems.
2. Such databases and systems do exist but are used inconsistently to record information about tenancies.
3. Record keeping is largely manual, and dependent on the diligence of the Tenancy Advisor
4. City Housing Unit management and staff have developed their own systems to record tenancy information to compensate for the lack of a central system for the management of tenancies.
5. The SAP environment currently used for the recording of notes regarding tenant interaction is not adequate and is open to unaudited addition, amendment or deletion of notes by any staff with access to the tenancy module.
6. The lack of a central system for the management of tenancies, (including the recording of notes) presents a risk that a Tenancy Advisor will not have all the necessary information they require, or that critical information will be missed.

2.2.3 Training of Tenancy Advisors

Background

CCC Tenancy Advisors are responsible for delivering frontline tenancy services to the Christchurch social housing population. They are the staff in daily contact with the tenants, their families and support people. Their role requires them to go into the homes and complexes of their tenants on a daily basis, and often in response to complaints. For tenants, the Tenancy Advisor is the 'face of the council' especially when they are in conflict with the neighbors or with CCC.

Given this, and the high social needs impacting many of the tenants, it is important that Tenancy Advisors are provided with appropriate training in dealing with conflict and management of their personal safety and that of their colleagues.

New Tenancy Advisors joining the team spend the first month in CCC induction training and shadowing an experienced Tenancy Advisor before engaging with tenants on their own.

Individual training courses have been offered to some staff during the period under review, in association with the Australasian Housing Institute on such matters as de-escalation and the identification of addiction.

Findings

1. The Tenancy Advisors interviewed described sporadic and inadequate training in the areas of dispute resolution.
2. Training for incoming Tenancy Advisors is largely on the job learning and augmented with sporadic training on specific aspects of their work such as dispute resolution.
3. There is an over reliance on the (considerable) experience of Tenancy Advisors recruited into the team.
4. Tenancy advisors have not received the training required to deliver on all aspects of their role and therefore to support the delivery of the CCC Social Housing strategy.

2.3 Other matters

2.3.1 Management of the MacGibbon Place complex

Background

MacGibbon Place is a CCC owned social housing complex comprising 36 one bedroom residential units located in Spreydon, Christchurch. All of the tenants at MacGibbon Place are City Housing Unit customers, meeting the social housing needs criteria.

In early May 2013 MacGibbon Place was one of a portfolio of 22 Council complexes (approximately 350 individual units) handed over as the result of the previous Tenancy Advisor moving to a different role. As a part of the handover, the incoming Tenancy Advisor was told that the victim and the offender had been referred for mediation.

The Tenancy Advisors in post at the time of the incident was attending at MacGibbon Place on average two or three times a month. Both Tenancy Advisors indicated that a higher number of complaints originated from MacGibbon Place compared to other complexes in that portfolio.

Findings

1. SAP contained no notes in respect of Unit 29 (the victim) prior to 1 July 2012 and no notes in respect of Unit 33 (the offender) prior to 1 July 2012. In both cases the first entry records show that the respective tenants were referred to a mediation service.
2. We have been unable to determine whether the absence of notes indicates that there were no complaints from these units, or whether complaints were received but not recorded. The Tenancy Advisor prior to the incident does not recall any issues that should have been noted.
3. The earliest notes on other units within MacGibbon Place date from 2001.
4. Complaints about tenant behaviour (other than the victim and offender) at MacGibbon Place include allegations of theft, use of an air rifle to kill a tenants pet, threats of violence, burglary, sexual assaults, and threats to kill.
5. The number of complaints recorded in SAP relating to the victim and offender were not high compared to other units within the MacGibbon Place complex.
6. The complaints recorded in SAP relating to the victim and offender did not disclose any threat of violence.
7. The offender did make a visit to the CCC offices on 10 June 2013. The note made by the Tenancy Advisor did refer to the fact she suggested *"he go and see the police if he felt he would hurt her"*. The Tenancy Advisor advised EY this was a standard response to tenants whom appeared distressed or aggravated by tenant conflicts, and was not reflecting of any threat by the offender to harm the victim.

2.3.2 Tenant complaints from MacGibbon Place

Background

In the portal Tenancy Management procedures set out how complaints raised by Tenants are to be captured, Specifically:

"SAP notes

All dealings with or regarding City Housing tenants must be documented in SAP. It is important to have a record of all dealings so an accurate history of a tenant and their tenancy is available for other staff if needed. SAP notes may also be used as supporting evidence at Tenancy Tribunal.

What to record

Inward and outward bound telephone conversations from tenants or third parties/agencies related to a tenant or tenancy should be accurately summarized. Listed below are examples of typical tenancy matters to be noted in SAP:

- Letters sent out (e.g. arrears) and received (e.g. complaints)
- Applications to Tenancy Tribunal
- RFS's submitted

Any notes made on conversations should relate to facts only and not opinion. If a staff member is on the receiving end of verbal threats or abuse direct speech should be recorded using quotation marks to identify what has been said"

SAP records for MacGibbon Place units contain notes on dealings with tenants as early as 2001. There are no SAP notes for the units of the victim or offender prior to 2009, and only one note in that year recording a referral to mediation. There are no further SAP notes in respect of the victim and offender until the handover of the portfolio in 2012, after which regular notes are entered into SAP.

None of the SAP notes in respect of the victim or offender disclose any threat of violence. The notes disclosing complaints are few in number with five complaints from the victim about the offender and three from the offender about the victim during the period under review.

SAP notes in relation to other units do disclose threats of violence and are more frequent in number.

Appendix Three sets out a summary of the complaints of anti-social behaviour originating from units at MacGibbon Place extract from the SAP notes. All units other than the victim and offender have been randomized.

We note that the notes field in SAP used to record notes is not time stamped or capable of being audited. All Tenancy Advisors and Managers in the City Housing Unit have access to the notes field. There are no controls to prevent the addition, deletion or amendment of notes.

Findings

1. Complaints about tenant behaviour (other than the victim and offender) at MacGibbon Place included allegations of theft, use of an air rifle to kill a tenants pet, threats of violence, burglary, sexual assaults, and threats to kill. These are typical complaints that are dealt with on a daily basis across many of the housing complexes managed by CCC.
2. The number of complaints recorded in SAP relating to the victim and offender were not high compared to other units within the MacGibbon Place complex. The nature of the compliant details recorded was not inconsistent with other complaints being dealt with leading up to, at the time and preceding the incident.
3. The complaints recorded in SAP relating to the victim and offender did not disclose any threat of violence.

2.3.3 CCC call centre

Background

Tenants who wish to raise a complaint call the CCC central call centre, which deals with all calls to CCC. Calls are answered by the call centre, and then callers are referred to the City Housing Unit where it relates to a housing matter. If the relevant Tenancy Advisor is not available the call centre will leave a message and/or send an email summary of the call details to the Tenancy Advisor.

Tenancy Advisors are issued with mobile phone, but the numbers for those mobiles are not published to tenants. Practice varies between staff members, but most do not give out mobile numbers to tenants, obliging tenants to go through the call centre channel.

Findings

1. There is no dedicated call centre and/or CS staff to deal with City Housing Unit tenant issues. This is the main channel for tenants to communicate issues through to the Tenancy Advisors.
2. The call centre staff are not trained to triage or deal with issues that are presented over the phone.
3. The call centre do not have access to SAP notes and therefore no notes can be recorded against a tenant/property.

2.3.4 Team culture and support

Background

The Team Leader at the time of the incident has since left CCC. Tenancy Advisors reporting to that Team Leader spoken to during the review, indicated that following the earthquakes of 2011 the number of Tenancy Advisors had reduced and approximately 400 tenants had to be relocated from earthquake damaged properties to complex's that were safe to inhabit. The movement of tenants into other complexes created additional pressures on staff and the volume of complaints from tenants increased as a result of the stressful times felt by everyone in Christchurch and the impact of moving tenants to new complexes.

The team environment at the time of the incident was not functioning well. Those interviewed during the review were candid about their feelings of the lack of peer support for Tenancy Advisors, the lack of a collaborative and consultative culture and the resourcing pressures faced in this area with a reduced team and an extraordinary high workload resulting from the earthquakes.

All staff interviewed stressed that there has been an improvement in the team culture, and some noted a significant improvement over the past 12 months. The team make up has changed, with only three of the Tenancy Advisors employed at the time of the incident remain in the City Housing Unit, and a new team leader in post.

Findings

1. The team culture at the time of the incident was poor and this contributed to the variations in adherence to policy and procedure within the Unit.
2. Resourcing of the team was not optimal and impacted on the individuals in these Tenancy Advisor roles and their ability to perform their role.

2.3.5 Personal safety of Tenancy Advisors

Background

Tenancy Advisors, as a part of their role, are required to enter the complexes managed by CCC and enter the homes of individual tenants. In the overwhelming majority of cases this presents no issues. However given the high social needs of many of the tenants, there is a risk that complaints being addressed by Tenancy Advisors may quickly escalate in an unpredictable way.

Tenancy Advisors are supplied with personal alarms that they may carry with them on visits to complexes. In practice, Tenancy Advisors do not carry these devices. The devices are audible alarms only. The alarms have no GPS or other location functionality. The alarms have no radio or other communication functionality. Tenancy Advisors felt the alarms if used would further aggravate the tenant and potentially increase the risk of harm to them.

We were advised of numerous situations where Tenancy Advisors had been threatened physically or were concerned for their safety when dealing with particular tenants. In some of these cases, the Tenancy Advisors later discovered that the individual had previous conviction for serious violence offences.

Subsequent to the incident at MacGibbon Place the City Housing Unit introduced the Anti-Social Behaviour (Red Flag database) database to record and manage incidents of anti-social behaviour, including threats to staff.

Tenancy Advisors are encouraged to access the Anti-Social Behaviour database and discuss with team leaders before visiting a property. Tenancy Advisors are encouraged to discuss within the team any issues they may come across with tenants engaging in anti-social behaviour.

A 'buddy system' is in place so that Tenancy Advisors may, at their discretion, attend visits in pairs.

There is however, no formal health and safety or other risk assessment conducted before Tenancy Advisors attend at a particular address. No self-defence training has been provided.

Tenancy Advisors are encouraged to discuss concerns about visits with, and be accompanied by, the Mobile Tenancy Advisor.

Findings

1. There is inadequate monitoring of the Tenancy Advisors. They are visiting sites and no one within the Housing Unit will know where they are at any given point in time.
2. There is no formal risk assessment undertaken before Tenancy Advisors visits tenants homes, and informal assessment of the potential risks are reliant on the Tenancy Advisors experience, the Tenancy Advisor accessing the Anti-Social Behaviour database (and the integrity of that data) and the informal sharing of information about potential problems amongst the team.

Appendix One - Procedures performed

The accompanying table provides details of the procedures performed. Procedure results are included in Part 2 – Findings.

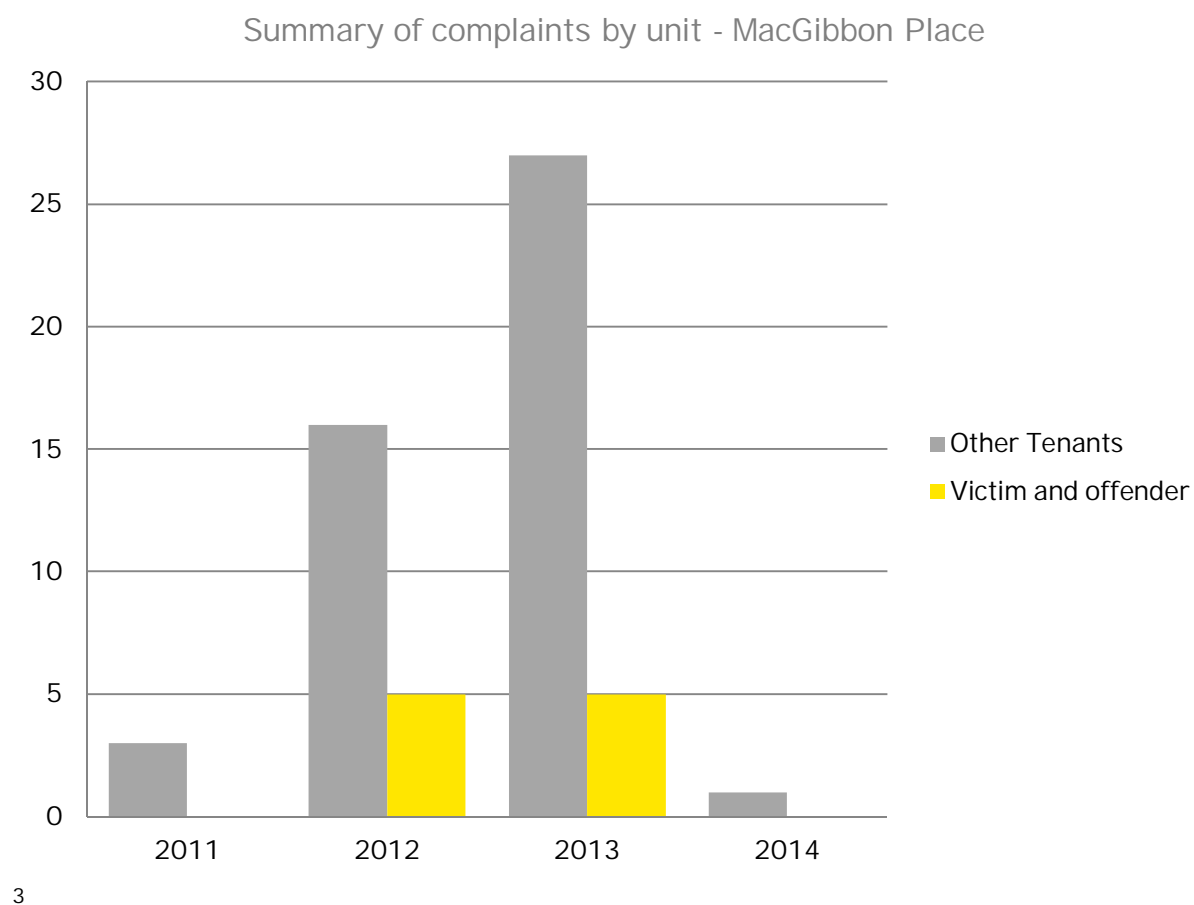
Scope area	Procedures performed
Council and City Housing Unit policies, procedures and other documents	<p>We read the following policies and procedure documents provided by council:</p> <ul style="list-style-type: none"> • Christchurch City Council Social Housing Strategy • City Housing Earthquake Re-location Team Procedures (CHERT) Detailed Engineering Evaluation (DEE) Assessment • City Housing Earthquake Relocations Team Procedures (CHERT) Temporary Accommodation • City Housing Emergency Operational Management Procedures (CHEOMPS) • City Housing Operational Portal – Anti Social Behaviour • City Housing Operational Portal – Funds Management • City Housing Operational Portal – Garages, Car Ports and Storage Units • City Housing Operational Portal – Mediation and Tenancy Tribunal • City Housing Operational Portal – Tenancy Management • City Housing Operational Portal – Vacants • Council Social Housing - Formal Complaints Procedure • Position Description – Housing Operations Team Leader • Position Description – Tenancy Advisor • City Housing Caution Listing
Tenancy management practices	<p>Review of SAP notes for all units at MacGibbon Place</p> <p>Walkthrough of SAP, City Housing operations portal, Tenancy Database, Anti-Social Behaviour database, Housing Unit Workbench and TRIM.</p> <p>We conducted interviews with the following:</p> <ul style="list-style-type: none"> • Housing Assets & Partnerships Manager • Housing Unit Manager • Mobile Tenancy Advisor • Senior Solicitor • Team Leader, Housing Services • Tenancy Advisor A • Tenancy Advisor B • Tenancy Advisor C (former)
Other Matters	<p>We read the following additional documents provided by council:</p> <ul style="list-style-type: none"> • CCC internal investigation document – “MacGibbon Place Incident Report” • CCC summary of MacGibbon Place SAP notes • Copy NZ Police Statement of [Tenancy Advisor] • Selected email correspondence regarding CCC internal investigation • TRIM documents – offender • TRIM documents – victim <p>We viewed three CCC social housing complexes, including the MacGibbon Place complex.</p>

Appendix Two - Glossary

Reference	Description
CCC	Christchurch City Council
TRIM	Tracking Recording Information Management
Tenancy Advisor	CCC officer responsible for the administration of social housing tenancies, also referred to as Housing Officer

Appendix Three – Summary of complaints – MacGibbon Place

	2011	2012	2013	2014
Complaints from victim or offender	0	5	5	0
Complaints from other Tenants	3	16	27	1
Total of all complaints	3	21	32	1



³ Summary of complaints is based on an analysis of the SAP notes of each unit at MacGibbon Place, extracted by CCC.

EY | Assurance | Tax | Transactions | Advisory

About EY

EY is a global leader in assurance, tax, transaction and advisory services. The insights and quality services we deliver help build trust and confidence in the capital markets and in economies the world over. We develop outstanding leaders who team to deliver on our promises to all of our stakeholders. In so doing, we play a critical role in building a better working world for our people, for our clients and for our communities.

EY refers to the global organization and may refer to one or more of the member firms of Ernst & Young Global Limited, each of which is a separate legal entity. Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients. For more information about our organization, please visit ey.com.

© 2014 Ernst & Young, New Zealand.
All Rights Reserved.