



Wolverhampton Homes Open Board Meeting

24 April 2020

Time 9.30 am **Public Meeting?** YES **Type of meeting** Wolverhampton Homes
Venue Virtual Meeting via Teams

Membership

Derek Allen
Parveen Brigue
Victor Browne
Angela Davies
Hajrija Dergic
Steve Finegan
Joy McLaren
Linda Middleton
Councillor Lynne Moran
Councillor Rita Potter
Councillor Zee Russell
Councillor Paul Singh

Information

If you have any queries about this meeting, please contact Maya Dhanda:

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Copies of other agendas and reports are available from:

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Agenda

<i>Item No.</i>	<i>Title</i>
1	Apologies
2	Declarations of interest
3	Minutes of previous meeting - 31 January 2020 (Pages 3 - 6)
4	Matters arising

FOR DECISION

5	Health and Safety Policy 2020 - 2021 - Julie Haydon, Assistant Director - Corporate Services (Pages 7 - 28)
6	People Development Update - Julie Haydon, Assistant Director - Corporate Services (Pages 29 - 36)
7	Business Continuity Planning Strategy 2020 - 2022 - Nicky Devey, Head of Business Services (Pages 37 - 66)

FOR INFORMATION

8	Allocations Policy Briefing Report - Henry Gregory, Housing Customer Insight Manager, CWC (Pages 67 - 102)
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M INUTES



Meeting: OPEN BOARD MEETING

Date: FRIDAY 31 JANUARY 2020

Venue: WV ACTIVE, ALDERSLEY ROAD, WOLVERHAMPTON, WV6 9NW

Time: 9:30 AM

MEMBERS IN ATTENDANCE: -

Angela Davies	-	Chair of the Board
Steve Finegan	-	Vice Chair of the Board
Linda Middleton	-	Board Member
Derek Allen	-	Board Member
Councillor Lynne Moran	-	Board Member
Councillor Paul Singh	-	Board Member
Councillor Zareena Russell	-	Board Member
Councillor Rita Potter	-	Board Member

STAFF IN ATTENDANCE:-

Shaun Aldis	-	Chief Executive
Angela Barnes	-	Assistant Director – Housing Options
Kevin Manning	-	Assistant Director – Property
Darren Baggs	-	Assistant Director – Housing
Julie Haydon	-	Head of People Services
Nicky Devey	-	Head of Business Services
Catherine Stewardson	-	Business Assurance Manager
Jessica Whitehouse	-	Business Assurance Officer
Simon Bamfield	-	Head of Commercial Services and Stock Investment

CWC STAFF IN ATTENDANCE: -

Jo McCoy	-	Head of Financial Management (CWC)
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OBSERVERS IN ATTENDANCE: -

Graham Childs	-	Representative of Wolverhampton Federation of Tenants Association
Lynda Eyton	-	Client Relationship Manager – Housing Management Agents (CWC)

1.0	<p>Apologies</p> <ul style="list-style-type: none"> - Hajrija Dergic – Independent Board Member - Joy McLaren – Tenant Board Member - Parveen Brigue – Independent Board Member - Victor Browne – Tenant Board Member 	
2.0	<p>Declarations of Interest</p> <p>Tenant related issues – Angela Davies and Linda Middleton.</p> <p>Noted with interest, allowed to remain and join in the debate.</p>	
3.0	<p>Minutes of previous Open Board Meeting – 20 December 2019</p> <p>Minutes of the previous meeting were agreed as a true record.</p>	
4.0	<p>Matters arising</p> <p>There were no matters arising.</p>	
For Decision		
5.0	<p>Developing our Board – Julie Haydon, Head of People Services</p> <p>Board were provided with highlights from the report and details on the next steps following the self-assessments completed in November 2019 including:</p> <ul style="list-style-type: none"> - Institute of Directors and Board Governance training delivered in January 2020 - Plans to launch the proposed competency framework <p>Board members commented that they found the training very insightful and well received and would like to see the Training and Development Plan used as part of the individual one to one appraisal process.</p> <p>Resolved: Board Members:</p> <ol style="list-style-type: none"> 1. Agreed the framework for individual improvement plans 2. Agreed the format of the draft Board Competency Framework; the draft Board Skills Self-Assessment and the draft Board Training and Development Plan 	
6.0	<p>Business Planning – Annual Delivery Plan 2020 – 2021 – Shaun Aldis, Chief Executive</p> <p>Board were provided with an update on a number of areas including:</p> <ul style="list-style-type: none"> - The changing landscape in housing with regulatory framework focussed in line with Consumer standards, compliance, complaints and the customer voice 	

	<ul style="list-style-type: none"> - The work the Housing Ombudsman has been undertaking nationally - The annual review of the company's Key Performance Indicators which includes RAG rating detail - Work being undertaken to develop the Home Improvement Agency bringing the three areas of business into one management function, providing opportunity to centralise and maximise the delivery to our customers <p>Board members were then provided with an overview on areas of joint work between Wolverhampton Homes (WH) and the City of Wolverhampton Council (CWC) in:</p> <ul style="list-style-type: none"> - Supporting the delivery of the overarching plan for the City as well as the WH Business Plan 2019 – 2023 and associated Annual Delivery Plan, which has been streamlined in response to feedback from Board members - WH / CWC discussion in regard to WV Living and the model for expansion of the home ownership developing arm at CWC which could see WH as a property owner - Delivery of the Homelessness service and how the Whitehouse provision is utilised as temporary accommodation - Working together with CWC Children's Services Transition team in supporting children in care into tenancies, as well as building on this to support care leavers (aged 16) in alleviating tenancy failure - Delivering an effective tenure blind ASB service linking in with the CWC Housing Team <p>Resolved: Board Members approved the draft Business Plan – Annual Delivery Plan for 2020 – 2021</p>	
For Information		
7.0	<p>Community Development Report – Julie Haydon, Head of People Services</p> <p>Board members were provided with details on the position in relation to WH's approach to community development, following the presentation of the strategy to Board in May 2019. Further information on key areas were detailed to members as follow on the:</p> <ul style="list-style-type: none"> - Focus on enhancing community cohesion and developing opportunities for tenants and residents and the good progress that has been made (detailed at 3.1 of the report) - Results of the consultation exercise carried out in 2019 (4000 tenants with a very low response rate), which didn't provide the 'tenant voice' feedback required to develop this further - Benefits of aligning this function to the Housing Directorate and the Estate Custodian model, encompassing wider tenant and resident engagement 	

	<ul style="list-style-type: none">- Involvement of the WH Review Panel and TPAS in reviewing the Scrutiny function- Joint work being undertaken with CWC Housing Strategy Team to develop customer engagement in line with requirements of the Regulator, of which Board will be kept updated of <p>Board members gave praise for the work undertaken by the Estate Custodians and on how their approach to front line problem solving is one that Councillor Board members are particularly grateful for.</p> <p>Resolved: Board Members noted the contents of the report</p>	
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Board Report

	Agenda Item 5 24 April 2020 Health and Safety Policy 2020 – 2021
	Open Report
Status:	For Decision
Author and job title:	Julie Haydon, Assistant Director - Corporate Services
Contact No:	01902 552956
Recommendations:	Board members are asked to approve the Wolverhampton Homes Health and Safety Policy 2020 - 2021.
Key risks and contentious issues:	<p>Protecting the Health and Safety of employees and members of the public who may be affected by the activities of Wolverhampton Homes is a statutory requirement and an essential part of risk management and must be led by the Board.</p> <p>Health and Safety law places duties on organisations, employers and Directors who can be personally responsible if these duties are breached.</p>

Management Summary

1.0 Purpose

- 1.1 The Health and Safety Policy has been reviewed and refreshed as part of the company's Health and Safety responsibilities and in line with its statutory requirements under the Health and Safety at Work Act 1974.
- 1.2 This Act places a legal duty on employers to ensure, so far as reasonably practicable, the health, safety, and welfare of employees, and to ensure that employees and others are kept safe.
- 1.3 This report aims to set out the company's commitment to implementing and maintaining this policy to ensure our legal and compliance obligations are met and exceeded, where possible.
- 1.4 In reviewing the policy, Wolverhampton Homes aims to assure Board of the company's understanding of required control measures and its roles and responsibilities to demonstrating that Health and Safety is a priority for Wolverhampton Homes.

2.0 Consultation and engagement

- 2.1 The revised Health and Safety Policy 2020 – 2021 is a result of consultation with both the Health, Safety & Wellbeing Group and the Health and Safety Champions Group, which includes representation from the Trade Unions.
- 2.2 Seeking feedback and input into the policy via these groups not only supports the raising of the profile of health and safety within the organisation, it also demonstrates collaborative working between the employer, employees and the Trade Unions.

3.0 Financial and value for money implications

- 3.1 There are no proposals within this report that have financial and value for money implications, however, failure to adhere to Health and Safety requirements can have a negative financial impact.

4.0 Legal implications

- 4.1 The Health and Safety policy is a statutory requirement.

5.0 Human resources implications

- 5.1 There are no proposals within this report that have human resources implications.

6.0 Health and Safety implications

- 6.1 There are no immediate Health and Safety implications as a result of this report. However, it is vitally important that the company manages and monitors the Health, Safety and Wellbeing of its employees while adhering to its statutory responsibilities.

7.0 Equalities implications

7.1 Wolverhampton Homes is committed to managing the health, safety and wellbeing of all its employees.

8.0 Impact on the environment and community

8.1 There are no proposals within this report that impact on the environment and economy.

9.0 Long term consequences for the company

9.1 There would be long term reputational damage to the company where it was found to be in breach of its Health and Safety responsibilities.

10.0 Impact on business relationships with suppliers, customers and others

10.1 Failure for the company to take its Health and Safety responsibilities seriously could negatively impact on its business relationships with suppliers, customers and others.

10.2 In line with Consumer Standard responsibilities, the company is required to meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.

11.0 Impact on Wolverhampton Homes' Management System

11.1 If approved, the Wolverhampton Homes Management system will be updated with the Health and Safety Policy 2020 – 2021 and this document will be made available on the company's website.

12.0 List of Appendices

12.1 Appendix 1: Draft Health and Safety Policy 2020 - 2021

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Appendix 1: Draft Health and Safety Policy 2020 - 2021

Document Owner:	Approved by:	Authorised by:	Effectiveness Date:	Review Date:
Assistant Director – Corporate Services	Health and Safety Committee	Chief Executive	To be approved by Board	TBC
Name: Signature:	Name: Signature:	Name: Signature:		

Review

Version:	Change Note:	Authorised by:	Date:

Statement of intent

Occupational health, safety & environmental duties are everyone's responsibility, as such, all employees, business partners and contractors will comply with this policy. Health, safety and environmental aims and objectives will be agreed through consultation and participation of Wolverhampton Homes Ltd employees and any other representatives to help the company meet its strategic plans. The company will therefore ensure that positive intended outcomes and maintenance of the occupational health, safety and environmental management systems are achieved and is committed to the continual improvement of these systems.

Wolverhampton Homes Ltd, so far as is reasonably practicable:

- Commits to providing and managing decent homes for our customers to live in as well as a healthy and safe working environment to prevent ill health and work-related injuries to anyone
- Commits to reducing risks and where possible commit to eliminate hazards, prevention of pollution and sustainable resource use, including the reduction of waste and energy consumption while supporting the environment and improving sustainability
- Accepts that our duty extends to the public, other contractors and anyone else who could be affected by our work activities, and we will protect all parties when managing risk
- When making changes, ensures that these changes will be for the better and will result in improved standards of safety, health and wellbeing for our tenants, workforce and contractors. This commitment extends to the procurement of new plant and equipment, new chemicals or products, new means of access or egress and new training for employees at all levels within the business

To achieve this, the Senior Management Team:

- Commit to implementing and maintaining this policy to ensure our legal and compliance obligations are met and exceeded, where possible
- Accept that keeping up to date on matters of health, safety and environmental issues is an essential part of everyone's role and will ensure that the company conducts continuous professional development
- Will ensure that this policy is documented, relevant and communicated within the organisation and made available to any other interested parties, via the company website. It will also be available upon request.

This policy does not form part of an employee's contract of employment and may be amended at any time.

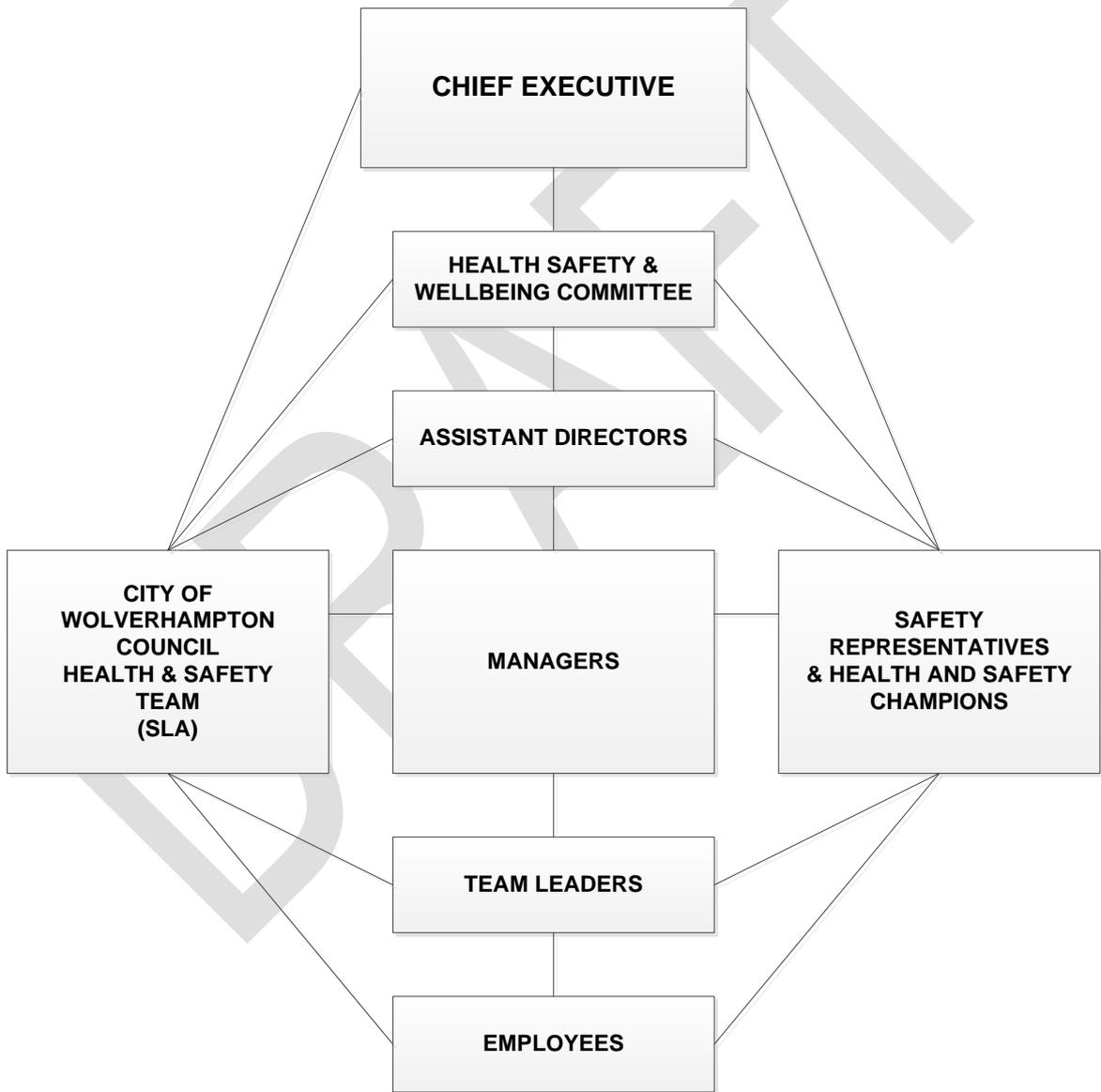
Shaun Aldis
Chief Executive

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Organogram

HEALTH & SAFETY



Responsibilities for health and safety

Wolverhampton Homes Board

Wolverhampton Homes Board accept their responsibilities with regards to ensuring effective implementation of health and safety systems and procedures.

The Board will:

- Set a personal example in safety matters and acknowledge suggestions for improvement, for the creation of a positive safety culture
- Attend appropriate training and make provision for adequate and appropriate training to be given to all employees at all levels
- Understand the company's responsibilities under the Health and Safety at Work etc. Act 1974, and any relevant Acts of Parliament and Statutory Instruments

The Board will appoint:

- A Health and Safety Board Champion, who will approve the strategic health and safety action plan and monitor its implementation and progress

The Board will ensure that:

- There is an effective company policy for safety, health and environmental and that all are made aware of the requirements within
- There is a robust and fair process in place, to deal with incidents first rather than the individual, creating a 'no blame' culture
- There is a mechanism for consultation on any changes at the workplace that may substantially affect health and safety, for example, changes to this policy
- Suitable & sufficient time and resources are available to purchase required tools, equipment, plant and machinery to an appropriate standard
- Documentation related to safe working practices is produced and distributed to the appropriate employees and retained for the appropriate time
- Suitable arrangements for managing a project are available under the requirements of the Construction (Design and Management) Regulations 2015
- Workplace safety inspections are carried out regularly by competent persons and that any actions arising from them are implemented
- All "assessments" as required by legislation are conducted and reviewed at relevant intervals, to ensure records are maintained of the same
- The workplace is kept safe by encouraging all staff to keep work areas tidy and free from trip hazards and dispose of waste properly

Chief Executive

The Chief Executive is accountable for the overall arrangements and for ensuring that the company's operations are always executed in such a manner as to ensure, so far as is reasonably practicable, the health, safety and wellbeing of all employees and others who may be affected by its operations. This extends to the protection of the environment.

The Chief Executive will:

- Set a personal example in safety matters and acknowledge suggestions for improvement, for the creation of a positive safety culture
- Attend appropriate training and make provision for adequate and appropriate training to be given to all employees at all levels
- Understand the company's responsibilities under the Health and Safety at Work etc., Act 1974, and any relevant Acts of Parliament and Statutory Instruments

The Chief Executive will appoint:

- An Assistant Director responsible for safety, health and environment, and provide adequate resources to secure compliance with the policy and legislation
- One or more competent persons to assist them in undertaking the imposed upon them by or under any relevant statutory provisions

The Chief Executive will ensure that:

- There is an effective company policy for safety, health and environmental and that all are made aware of the requirements within
- There is a robust and fair process in place, to deal with the incident first rather than the individual, creating a 'no blame' culture
- There is a mechanism for consultation on any changes at the workplace that may substantially affect health and safety, for example, changes to this policy
- Suitable & sufficient time and resources are available to purchase required tools, equipment, plant and machinery to an appropriate standard
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- All "assessments" as required by legislation are conducted and reviewed at relevant intervals, to ensure records are maintained of the same
- The workplace is kept safe and encourage all staff to keep work areas tidy and free from trip hazards and dispose of waste properly

Assistant Director responsible for Health & Safety

The Assistant Director responsible for Health & Safety is accountable to the Chief Executive for all matters relating to health, safety and welfare of employees and those affected by the company's operations.

The Assistant Director responsible for Health & Safety will:

- Understand and have full knowledge of all parts of this policy, ensuring any regulatory requirements are brought to the attention of the Chief Executive
- Be responsible for the provision of health, safety and environmental information and compliance, legal obligations and other requirements are met
- Attend appropriate training and make provision for adequate and appropriate training to be given to all employees at all levels
- In accordance with company policy and through liaison with HR, initiate disciplinary action, where necessary, against staff who do not comply with their duties under the policy or statutory requirements
- Liaise with the competent person, appointed for the provision of competent health and safety advice, over the full range of their duties and responsibilities

The Assistant Director responsible for Health & Safety will also ensure that:

- All the workforce has received a copy of the policy and have signed to indicate that they have read and understood it
- Consultation is taking place on any changes at the workplace that may substantially affect health and safety, for example, changes to this policy
- The workforce is suitably trained/competent to carry out their tasks and that the necessary licenses/certificates of competence are in place
- Regular inspections are conducted on tools, equipment, plant and machinery ensuring that it is kept at an appropriate standard
- Appropriate documentation is created, and records are kept, as required by legislation, and retain documents for the appropriate time periods
- Duty holders have been appointed before any construction phase begins and that pre-construction information is provided as soon as possible
- Workplace safety inspections are carried out regularly by competent persons and that any actions arising from them are implemented
- All "assessments" as required by legislation are conducted and reviewed at relevant intervals, to ensure records are maintained of the same
- The workplace is kept safe and encourage all staff to keep work areas tidy and free from trip hazards and dispose of waste properly

Senior Management Team

The Senior Management Team is responsible for their personal safety and for the safety all employees under their authority, and others who may be affected by the company's activities.

The Senior Management Team will:

- Be responsible for safety, health and environmental within the company and will ensure the provision of adequate resources to implement this policy
- Ensure compliance with the safety, health and environmental policy to provide the leadership and commitment to promote a positive culture
- Be responsible for the provision of health, safety and environmental information to all employees under their authority and compliance is met
- Attend appropriate training and make provision for adequate and appropriate training to be given to all employees at all levels
- In accordance with company policy and through liaison with HR, initiate disciplinary action, as a last resort against staff who do not comply with their duties under the policy or statutory requirements
- Ensure that consultation is taking place on any changes at the workplace that may substantially affect health and safety, for example, changes to this policy
- Take heed of any advice given by the competent person, to comply with the requirements and prohibitions of any relevant statutory provisions

The Senior Management Team will ensure that:

- All the workforce is suitably trained/competent to carry out their tasks and that the necessary licenses/certificates of competence are in place
- Staff obtain and use the correct tools/equipment for the work and do not use any that are unsafe, damaged or untrained to use
- Appropriate documentation is created and that records are kept, as required by legislation and retain documents for the appropriate time periods
- Duty holders have been appointed before any construction phase begins and that pre-construction information is provided as soon as possible
- Workplace safety inspections are carried out regularly by competent persons and that any actions arising from them are implemented
- All "assessments" as required by legislation are conducted and reviewed at relevant intervals, to ensure records are maintained of the same
- The workplace is kept safe and encourage all staff to keep work areas tidy and free from trip hazards and dispose of waste properly

Heads of Service and Managers

Heads of Service and Managers, are responsible for their own personal safety and that of all employees under their management, including others who may be affected by the company's activities.

The Heads of Service and Managers will:

- Understand and implement the company safety, health and environmental policy, ensuring that all the workforce is provided with a copy
- Appreciate the responsibilities of employees under their management and ensure that each employee knows their responsibilities
- Be responsible for the provision of health, safety and environmental information to all staff under their authority and for ensuring management/legal compliance
- Attend appropriate training as required to understand their general and specific safety, health and environmental responsibilities
- Report any non-compliance to establish if disciplinary action is required, against staff who do not comply with their duties under the policy
- Ensure that consultation is taking place on any changes at the workplace that may substantially affect health and safety, for example, changes to this policy
- Take heed of any advice given by the competent person, to comply with the requirements and prohibitions of any relevant statutory provisions

The Heads of Service and Managers will ensure that:

- All the workforce is suitably trained/competent to carry out their tasks and that the necessary licenses/certificates of competence are in place
- Staff obtain and use the correct tools/equipment for the work and do not use any that are unsafe, damaged or untrained to use
- Appropriate documentation is created and that records are kept, as required by legislation and retain documents for the appropriate time periods
- Duty holders have been appointed before any construction phase begins and that pre-construction information is provided as soon as possible
- Workplace safety inspections are carried out regularly by competent persons and that any actions arising from them are implemented
- All "assessments" as required by legislation are conducted and reviewed at relevant intervals, to ensure records are maintained of the same
- The workplace is kept safe and encourage all staff to keep work areas tidy and free from trip hazards and dispose of waste properly

Sub-Contractors (Suppliers and Supply chain)

Sub-Contractors (Suppliers and Supply chain) are accountable for their personal safety and that of all employees and contractors under their authority, including others who may be affected by their activities.

Sub-Contractors (Suppliers and Supply chain) will:

- Comply with this policy, as a condition of their contract and will be required to supply a copy of their Health and Safety Policy for scrutiny
- Appreciate the responsibilities of employees and contractors under their authority, ensure that each of their employees/contractors know their responsibilities
- Be responsible for hazard identification on the tasks and activities in their undertaking, ensuring that these hazards are suitably and sufficiently controlled
- Attend appropriate training as required to understand their general and specific safety, health and environmental responsibilities, as well as all contractors
- Initiate action, as a last resort against their employees and sub-contractors who do not comply with their duties under the policy or statutory requirements
- Ensure that consultation is taking place on any changes at the workplace that may substantially affect health and safety, for example, changes to this policy
- Ensure that they have competent health and safety advice and that they take heed of any advice given by the competent person

Sub-Contractors (Suppliers and Supply chain) will ensure:

- That all the workforce is suitably trained/competent to carry out their tasks and that the necessary licenses/certificates of competence are in place
- That staff obtain and use the correct tools/equipment for the work and do not use any that are unsafe, damaged or untrained to use
- Appropriate documentation is created and that records are kept, as required by legislation and retain documents for the appropriate time periods
- Act as the relevant duty holder, under CDM regulations, as appointed. Ensuring duties are fulfilled, including Wolverhampton Homes Ltd duties as a Client.
- That workplace safety inspections are carried out regularly by competent persons and that any actions arising from them are implemented
- That all “assessments” as required by legislation are conducted and reviewed at relevant intervals, to ensure records are maintained of the same
- The workplace is kept safe and encourage all staff to keep work areas tidy and free from trip hazards and dispose of waste properly

First Aiders

First Aiders will be appointed on behalf of Wolverhampton Homes Ltd in accordance with Regulation 3 of the Health and Safety (First-Aid) Regulations 1981 (As amended).

First Aiders will:

- Understand the company safety, health and environmental policy, know their responsibility and be equipped to play their part
- Maintain applicable health and safety documents and ensure awareness of policies, processes, guidance and codes of practice with regards to first aid
- Be responsible for the provision of health, safety and environmental information relating to first aid and for ensuring compliance
- Attend appropriate training as required to understand their general safety, health and environmental responsibilities in addition to First Aid training
- Report any non-compliance to establish if disciplinary action is required, against staff who do not comply with their duties under the policy
- Be included in consultation on any changes at the workplace that may substantially affect health and safety, for example, changes to this policy
- Take heed of any advice given by the competent person, to comply with the requirements and prohibitions of any relevant statutory provisions
- Carry out assigned tasks and duties in a safe manner, in accordance with instructions, and to comply with safety rules/procedures
- Check the condition/contents of first aid box's and will inform management of any deficiencies.
- Have access to a working phone, in order to be able to summon assistance
- Ensure appropriate documentation, related to first aid is created and distributed to the appropriate employees. Ensure accurate records are kept

Fire Marshals

Fire Marshals will be appointed on behalf of Wolverhampton Homes Ltd in accordance with Regulation 15 of the Regulatory Reform (Fire Safety Order) 2005.

Fire Marshals will:

- Understand the company safety, health and environmental policy, know their responsibility and be equipped to undertake their role as a fire marshal
- Maintain applicable health and safety documents and ensure awareness of policies, processes, guidance and codes of practice
- Be responsible for the provision of health, safety and environmental information relating to fire marshals and for ensuring compliance
- Attend appropriate training as required to understand their general safety, health and environmental responsibilities in addition to fire marshal training
- Report any non-compliance to establish if disciplinary action is required, against staff who do not comply with their duties under the policy
- Be included in consultation on any changes at the workplace that may substantially affect health and safety, for example, changes to this policy
- Take heed of any advice given by the competent person, to comply with the requirements and prohibitions of any relevant statutory provisions
- Carry out assigned tasks and duties in a safe manner, in accordance with instructions, and to comply with safety rules/procedures
- Check the condition of any relevant equipment and will inform management of any deficiencies.
- Have access to a working phone, in order to be able to summon assistance
- Ensure appropriate documentation, related to fire marshals is created and distributed to the appropriate employees. Ensure accurate records are kept

Health, Safety & Wellbeing Committee (HSWB)

Wolverhampton Homes Ltd Health, Safety & Wellbeing Committee (HSWB) will be governed by the Health & Safety (Consultation with Employees) Regulations 1996 and the Safety Representatives and Safety Committees Regulations 1977. This committee will give the opportunity to discuss general health and safety matters with employee safety representatives and Health and Safety Champions.

The meeting will be administrated through agreed Terms of Reference and minutes from the meeting will be made available via the company intranet.

Health and Safety Champions Group

This group will assist Wolverhampton Homes Ltd to be proactive with all matters of health and safety, this group is made up of representatives from the workforce with an interest in health and safety.

Regular meetings are held and will be administrated through agreed Terms of Reference and minutes from the meeting will be made available via the company intranet.

Working Groups

Working Groups will be appointed for specific activities across areas of the business. They will establish and maintain health, safety, wellbeing and environmental standards relevant to work activities.

They will give additional assurance on compliance to the Health, Safety & Wellbeing Committee (HSWB) on their specific area of the business.

The meetings will be administrated through agreed Terms of Reference and minutes from the meeting will be made available to the Health, Safety & Wellbeing Committee (HSWB).

City of Wolverhampton Council, Health and Safety Team

The City of Wolverhampton Council, Health and Safety Team, through a shared services Service Level Agreement will act as Wolverhampton Homes Ltd competent advisors on matters of Health and Safety, under Regulation 7 of the Management of Health and Safety at Work Regulations 1999.

They will ensure that Wolverhampton Homes Ltd have implemented a safety management system (SMS), the aim of the management system is to provide a framework for managing risks and opportunities whilst ensuring the prevention of injury and ill-health, providing a safe and healthy workplace, protecting the environment and preventing pollution.

The City of Wolverhampton Council, Health and Safety Team will undertake regular management reviews to assess any opportunities for improvement and any needed changes in the external and internal issues affecting the management system.

Safety Representatives / Representatives of Employee Safety and Health & Safety Champions

A trade union Safety Representative is a member of the workforce who is appointed to represent the interests of all their workplace colleagues, in respect of health and safety matters at work.

Representative of Employee Safety is a member of the workforce who is appointed to represent the interests of all their workplace colleagues, in respect of health and safety matters at work but is not in a recognised trade union.

Health and safety champions are representatives from the workforce with an interest in health and safety and who wish to be involved in assisting Wolverhampton Homes Ltd to progress its health and safety.

All three, play a valuable part in helping to maintain a safe and healthy working environment.

All will:

- Be consulted on the company policy for safety, health and environmental and will ensure that all are made aware of the requirements within
- Be consulted on all policies, processes, procedures and guidance, with regards to the organisations activities and will ensure all those they represent are made aware
- Be responsible for the provision of health, safety and environmental information to all staff and for assisting management/legal compliance
- Attend appropriate training as required to understand their general and specific safety, health and environmental responsibilities
- Review disciplinary action, against staff who have not complied with their duties under the policy, ensuring equality and a 'no blame' culture
- Consult with the workforce on any changes at the workplace that may substantially affect health and safety, for example, changes to this policy

If you are a trade union-appointed health and safety representative, your functions are set out in the Safety Representatives and Safety Committees Regulations 1977.

If you are a representative of employee safety, your functions are set out in the Health and Safety (Consultation with Employees) Regulations 1996.

Employees

The Management of Health and Safety at Work Regulations 1992 (MHSWR) re-enacts the Health and Safety at Work etc. Act 1974, which places responsibilities on the employer and employees alike. In this connection, Wolverhampton Homes Ltd reminds employees of their duties under Section 7 of the act: to take care for their own health and safety and that of others who may be affected by their acts or omissions.

Additionally, employees must also co-operate with the company to enable it to discharge its own responsibilities successfully.

Furthermore, all employees are expected to:

- Understand the company safety, health and environmental policy, ensuring they know their responsibility and are equipped to play their part
- Maintain applicable health and safety documents and ensure awareness of policies, processes, guidance and codes of practice
- Be responsible for the awareness of health, safety and environmental information and for assisting the organisation with compliance
- Attend training, as required, to understand their general and specific safety, health and environmental responsibilities, work in accordance of such training
- Be aware that formal procedures could ensue where they have not complied with their duties under the policy
- Be included in consultation on any changes at the workplace that may substantially affect health and safety, for example, changes to this policy
- Take heed of any advice given by the competent person, to comply with the requirements and prohibitions of any relevant statutory provisions
- Carry out assigned tasks and duties in a safe manner, in accordance with instructions, and to comply with safety rules/procedures
- Ensure that they obtain and use the correct tools/equipment for the work and do not use any that are unsafe, damaged or untrained to use
- Ensure appropriate documentation is created and that records are kept, as required by legislation and retain documents for the appropriate time periods

Employees will ensure that:

- Duty holders have been appointed before any construction phase begins and that pre-construction information is provided as soon as possible
- Workplace safety inspections are carried out regularly by competent persons and that any actions arising from them are implemented
- All “assessments” as required by legislation are conducted and reviewed at relevant intervals, to ensure records are maintained of the same
- The workplace is kept safe and encourage all staff to keep work areas tidy and free from trip hazards and dispose of waste properly

Arrangements for Health and Safety

This section sets out the health and safety management system and the way in which specific issues are dealt with.

This policy should be read in conjunction with other Wolverhampton Homes Ltd other policies, processes and procedures, available on Wolverhampton Homes Management System (WHMS):

- [WHMS](#)

All documentation is under regular review and will be updated to reflect legislation, current best practise and company policy.

Monitoring and Review

Proactive measurement of our performance against health and safety standards will be undertaken through:

- Formal review of performance against the health and safety policy
- Regular health and safety monitoring of the workplace and work activities
- Staff one-to-ones
- Monitoring of progress against action plans by the Health and Safety Committee

Formal Review and Audit

The Health, Safety & Wellbeing Committee (HSWB) will ensure that a formal audit takes place every year to determine whether this policy requires revision, and to measure whether the responsibilities and arrangements set down within the policy and associated procedures, are being implemented in practice. Following this audit, a report is presented to the Board analysing current performance, identifying major and minor non-conformances and making recommendations for corrective action. On receipt of the audit report, the Board agree the health and safety action plan and the resources necessary. They also agree health and safety performance targets and objectives for the coming year. The Chief Executive will drive forward improvements and monitor to ensure that progress is made within identified timescales, making frequent progress reports to the Board.

The Assistant Director responsible for Health & Safety will conduct a six-monthly strategic review with the Chief Executive to discuss progress in implementing the action plan, targets and objectives, identify any new concerns arising and provide further advice.

The Health and Safety Policy document is reviewed by the Chief Executive with input from the Assistant Director responsible for Health & Safety an annual basis, in liaison with representatives of the company, to ensure that the policy reflects current activities, company structure and legislation.

Regular Health and Safety Monitoring

The Health and Safety Representatives, including Health and Safety Champions undertake regular inspections to monitor that routine management actions are completed using a prepared checklist. On completion of the regular checks, the Health and Safety Representative collates the results and determines with the assistance of Management, any actions to be taken. Timescales and responsibilities are assigned to appropriate persons and at the next check, the Representative determines whether these are actions which remain outstanding from the previous monitoring. Where actions have not been completed the Representative highlights these to Management for follow up.

One-to-ones

Health and safety will be discussed at individual one-to-ones. If applicable, targets will be set to achieve personal development and outcomes from previous meetings.

Monitoring by the Health and Safety Committee

Our quarterly Health and Safety Committee meetings include a standing item for performance monitoring. This item is used by the committee to receive and evaluate progress reports concerning the health and safety action plan and overall objectives.

DRAFT

Policy Communication

It is the duty of every employer to prepare and update as necessary, a policy for Health, Safety and Welfare. It is also a duty for employers to communicate this policy to their employees.

For the purposes of ensuring safety in the workplace, both employees and subcontractors will be expected to read, understand and adhere to this policy.

It is important that you read through the policy carefully, as it will contain important information on company safety procedures and safe systems of work. It also contains responsibilities for you to undertake and comply with.

If you have any questions about the policy, please speak to your line manager. If you have any suggestions as to how safety could be improved, please pass these on also.

After you have read through this policy, please detach this sheet, sign and date it to confirm your understanding and responsibilities under this policy and pass it back to your line manager.

Name:	
Date:	
Job Title:	
Signature:	

Board Report

	Agenda Item 6
	24 April 2020 People Development Update
	Open Report
Status:	For Decision
Author and job title:	Julie Haydon, Assistant Director - Corporate Services
Contact No:	01902 552956
Recommendations:	Board members are asked: <ul style="list-style-type: none"> • To note the content of the report • Agree the high-level overview of the Organisational Development (OD) Strategy
Key risks and contentious issues:	<p>Wolverhampton Homes customers and their family members are at risk of not being competitive in the current job market due to low attainment levels and poor employability skills. This subsequently could have a negative impact on income to Wolverhampton Homes.</p> <p>Failing to prepare / support tenants through welfare changes; leaving tenants without the necessary skills to manage effectively.</p> <p>Failing to support the WH Business Plan strategic vision – to create a company where organisational development supports the skills required to achieve the key objectives of the Business Plan.</p> <p>Failure to deliver a robust apprenticeship programme could leave future skills gaps within the organisation and fails to contribute to the city-wide objective of creating sustainable employment opportunities for young people.</p>

Management Summary

1.0 Purpose

1.1 The report provides a progress update to Board members on all people development, training and employability activities and opportunities provided for employees, tenants, leaseholders and residents.

2.0 Background

2.1 Over the last 12 months, the People Development Team has continued to work actively in line with objectives of the Wolverhampton City Strategy 2011 - 2026, to develop a City where there are high levels of employment and opportunities for all types of learning throughout life.

2.2 Additionally, the development of the Organisational Development (OD) Strategy has set the scene for the current strategic cycle, identifying the skills required to effect the Business Plan and setting out the plan to develop and grow our staff and Board to meet the current and future skills requirements.

2.3 This progress report is split into the following areas:

- People Development Team structure
- Employability and Click-Start
- People Development
- Strategic Construction Partnership
- Apprenticeship Scheme and the Levy
- Graduate Development Programme

3.0 People Development Team structure and changes

3.1 Team structure:

The People Development Team structure has been reviewed and the following changes have been made:

- The Community Development function has been transferred from Corporate Services across to Tenancy Management within the Housing directorate to better align our community focused work

3.2 Revised structure:

With the OD Strategy and Delivery Plan approved, one of the fifteen key work packages will enable a review of the operating structure, roles and responsibilities and stakeholder engagement approach adopted by the wider People Services Team moving forward. It is our intention to develop a Business Partner approach across both Human Resources and Organisational Development.

4.0 Employability and Click Start programme

4.1 Employability:

Over the last two financial years, Wolverhampton Homes has supported tenants, leaseholders and residents into provision (employment, training, volunteering and work-experience).

The employment coaches have supported people who are some distance away from being ready for the job market, thus requiring more intense 1:1 support.

The total figures up to January 2020 from the Black Country Impact Team at CWC are:

- Engagements to date: **3110**
- Interventions completed to date: **1856**
- Outcomes to date: **1598**

(Outcome includes employment, education, apprenticeship, traineeship, gaining qualification and self-employment)

More specific data relating to referrals by our Employability coaches is incomplete due to long term absence and changes within the team. Figures for one Employability Coach who commenced employment with the team in October 2019 are shown in Table 1 below:

Month	Referrals to BCI	Outcome
Oct 2019	2	1 to Walsall BCI so no further update 1 moved into employment after completing training
Nov 2019	1	1 moved into employment
Dec 2019	3	1 moved into a traineeship 1 disengaged 1 still working with Impact
Jan 2020	5	2 disengaged 1 moved into a traineeship 1 disengaged from Impact but on a SBWA 1 still working with Impact
Feb 2020	4	2 still working with Impact 1 disengaged 1 moved onto Literacy & Numeracy with Juniper
Mar 2020	1	1 disengaged

Table 1: Referrals to BCI from Oct 2019 to Mar 2020 for one Employability coach

4.2 **Click Start:**

The Black Country Click Start is a project fully funded by The Lottery Community Fund and the European Social Fund. The aim is to help tenants tackle any digital and financial barriers they face to gaining and sustaining employment and accessing education and training.

The objectives of the project are:

- Participants have increased skills and confidence to use the internet
- Participants have improved access to employment, training and volunteer opportunities
- Participants have increased skills and ability to manage and save money
- Participants are able to communicate and connect with others

Over the last financial year, the Click Start Team have:

- Engaged with 190 residents
- Enrolled 84 residents onto the programme
- 81% of residents said that their confidence had improved after completion
- 6 residents gained employment through the programme

Click Start is presently due to run to June 2020. We have received notification of the extension to the Click Start project from the Project Manager at Walsall Housing Group (WHG) to September 2022.

5.0 **People Development**

5.1 **Introduction:**

The Organisational Development (OD) Strategy 2019 - 2023 has been reviewed and agreed by the Senior Management Team.

The purpose of the OD Strategy is to deliver the people and cultural transformation needed to achieve the objectives of our Business Plan 2019 - 2023. It details the way in which we intend to work with our staff, line managers, senior management and leadership teams, our Board members and other stakeholders and customers to help everyone reach their potential and contribute to the achievement of our corporate priorities.

It details the context in which the OD Delivery Plan will operate, as well as strategic objectives and eight key OD priorities, which will be delivered via fifteen work packages.

The fifteen work packages incorporate the ten-point action plan that has been derived from the findings and recommendations of the research project to support the pledge to Inside Housing's 'Inclusive Futures' campaign.

5.2 Background and context:

Wolverhampton Homes is committed to having a diverse and elite workforce that is confident and capable to deliver an excellent service to our customers. There is a need to ensure the OD Strategy is clear, robust and aligned to our Business Plan and VFM Strategy (in light of the current Covid-19 crisis this will now also be linked to the e Recovery Plan) to support and deliver on the people elements of our transformation journey #GoodtoGreat. Enhancing our capability is critical at all levels across the organisation; taking an OD approach will help everyone approach work through a fresh lens

5.3 High level summary:

Organisational Development (OD) is defined by CIPD as “a planned and systematic approach to improving organisational effectiveness through the alignment of strategy, processes and the involvement of its people”. Values and behaviours, once embedded in people processes, will shape and influence the organisational culture and drive performance towards achieving corporate strategic priorities.

Figure 1. shows the relationship between the Wolverhampton Homes values and behaviours, and the realisation of our vision supported by OD priorities.



Figure 1

To deliver the strategic people objectives, we have developed eight OD priorities:

- To be an employer of choice
- To develop a high performing organisation with high performing teams
- To develop the capability and capacity of our Board, leaders and managers
- To enhance our workforce systems, processes and information
- To maximise our workforce talent and potential
- To improve the health, safety and well-being of our workforce
- To shape our organisational culture and engage our people
- To be a truly customer-centric organisation

To help deliver on these priorities, there are fifteen work packages which form the OD Delivery Plan. For each work package, there will be three key elements: people, processes and systems.

6.0 Strategic Construction Partnership

6.1 The People Development Team are also responsible for working with Wates Living Space and United Living in relation to their employment and training aspirations. The partnership aims to deliver a legacy of supporting the community through local initiatives. Wolverhampton Homes continues to support the development of new build sites across the City by working with a range of developers.

6.2 Over the last year, the partnership has delivered:

- Four events at local schools such as career fairs, mock interviews and interactive demonstrations
- Four school work experience placements from our link school Our Lady & St Chad
- Support to the City skills show hosting over 800 students
- City Jobs Fair Molineux Stadium
- Bake off competition at Our Lady & St Chad

7.0 Wolverhampton Homes' Apprenticeship Scheme and Levy

7.1 In 2017 - 18 Wolverhampton Homes recruited 17 new construction apprentices. There are currently 9 remaining in their improver year from this cohort plus 2 due to complete 2021. In September 2020 a further 8 apprentices were recruited, 4 construction and 4 office apprentices. 3 construction apprentices currently remain out of this cohort and 3 office apprentices – 1 office apprentice has been successful in gaining employment with Wolverhampton Homes in the One Stop Shops.

7.2 The organisation has made use of the apprenticeship levy to fund the training costs of these apprentices.

7.3 Workforce planning will enable Wolverhampton Homes to make informed decisions about future profiles and team member requirements. This will identify critical roles and put in place robust succession plans as Wolverhampton Homes manage an increasingly ageing workforce. This will ensure that the company has the right skills, in the right place, doing the right things, at the right time. Wolverhampton Homes will also embed succession planning and career pathways at all levels of the organisation to help those who wish to develop their career with Wolverhampton Homes to identify their next steps, and to 'grow our own' future talent. Initial focus will be to analyse workforce profile data for those aged 50+ years and to work with the business to develop their workforce plans accordingly.

8.0 Graduate Development Programme

8.1 In 2018, Wolverhampton Homes joined the City of Wolverhampton Council in employing a graduate through the National Graduate Development Programme on a 2-year scheme. The graduate has been supporting the development of the Community Strategy and a review of Temporary Accommodation. They have recently been appointed to work on the development plans for the Home Improvement Agency for the remainder of their contract which is due to finish September 2020.

9.0 Proposal

9.1 Click Start:

To note the agreed Click Start extension to September 2022 when financial and budget information from remodelling has been made available.

9.2 OD Strategy:

Note the high-level overview of the OD Strategy, our eight strategic priorities and our fifteen work packages. Project plans will be developed for the work packages.

10.0 Legal implications

10.1 Wolverhampton Homes will work in line with European Social Fund / Lottery guidelines for Click Start.

11.0 Human Resources implications

11.1 In introducing the Business Partner approach Wolverhampton Homes People Services Team will require additional skills.

12.0 Health and Safety implications

12.1 There are no specific health and safety implications identified within the Community Development Strategy.

12.2 All activities have had health and safety consideration and all trainees receive thorough induction and training. Risk assessments are in place where required.

13.0 Equalities implications

13.1 Equality statistics are gathered for all programmes and the section works with community partners to address any under representation.

14.0 Impact on the environment and community

14.1 Local residents are benefiting from investment in skills leading to better employment prospects.

15.0 Long term consequences for the company

15.1 The activities of the People and Community Development Team raise the profile of the organisation as an employer of choice and enhance Wolverhampton Homes' reputation as an employment provider.

15.2 Equipping tenants with further qualifications promotes their job prospects. This in turn allows them to be better prepared for changes to Welfare.

16.0 Impact on business relationships with suppliers, customers and others

16.1 The provision of a fit for purpose approach to Community Development will have a positive impact on the relationships with the Company's suppliers, customers and others.

17.0 Impact on Wolverhampton Homes' Management System

17.1 There is no impact on the Wolverhampton Homes' Management System identified in this report.

Board Report

	Agenda Item 7
	24 April 2020 Business Continuity Strategy – 2020 – 2022
	Open Report
Status:	For Decision
Author and job title:	Nicky Devey, Head of Business Services
Contact No:	01902 552956
Recommendations:	Board members are asked to: <ul style="list-style-type: none"> • Agree the strategy detailed at Appendix 1 • Note the steps being taken to improve our approach to the management of major emergencies or periods of disruptive challenge
Key risks and contentious issues:	<p>Activation of the company's Business Continuity Plan's or the City's major emergency plan is critical for the effective management in response and co-ordination of an emergency or disaster.</p> <p>Effective deployment of resources and an adequate escalation process supports both the company and its customers in the event of such events.</p> <p>Wolverhampton Homes has a robust approach to its Business Continuity Planning including the response to, and management of, emergency incidents and periods of disruptive challenge.</p>

Management Summary

1.0 Purpose

- 1.1 This report seeks to implement the updated Business Continuity Strategy to continue to improve Wolverhampton Homes' approach to Business Continuity planning and management.

2.0 Background

- 2.1 As Board are aware, Wolverhampton Homes operates in a dynamic environment could face a range of emergency incidents such as periods of disruptive challenge or events that would require focussed, effective and efficient responses.
- 2.2 Failure by Wolverhampton Homes to have the right plans in place to manage and respond to such incidents could pose significant risks, not only to the company but to its Board, key stakeholder, partners and customers who access its services.
- 2.3 Wolverhampton Homes has effectively managed a range of incidents successfully in recent years relying on a range of internal resources and joint working with the City of Wolverhampton Council (CWC), ensuring an appropriate and proportionate response.
- 2.4 However, there is no complacency about the readiness of the company to be able to respond and as such the Business Continuity Planning Strategy has been reviewed and updated for 2020 – 2022.

3.0 Overview of the revised and updated strategy

- 3.1 The revised and updated Business Continuity Strategy includes consideration of key incidents that Wolverhampton Homes could face. In summary, the top 5 scenarios are as follows:
 - Any incident involving significant disturbance or suffering to customers
 - The loss of any building under the remit of Wolverhampton Homes (access & contents)
 - The loss of IT systems for a prolonged period dependent on the function and area impacted, preventing normal customer service
 - Any incident within a High / Medium Rise property that is affecting more than one property
 - A high percentage of staff unable to work or work in their normal roles
- 3.2 The document identifies the decision-making process to be followed for any situation declared a major emergency. It also identifies the roles and responsibilities of key staff who would be involved in the management of any incident and how they deliver our strategic, tactical and operational responses.
- 3.3 It details how Wolverhampton Homes would mobilise a Response and Recovery Team (RRT) to work in partnership with the emergency services, and our colleagues at the City of Wolverhampton Council.

- 3.4 It details a range of activity and high-level procedures to be followed to mitigate the impact of the types of incidents identified.
- 3.5 There are separate individual service area-based Business Continuity Plans that have been completed, which are subject to quarterly review.

4.0 Reviewing the Strategy and Business Continuity Plans

- 4.1 Following activation of the Strategy or Business Continuity Plans, a full debrief will be carried out by Wolverhampton Homes to ensure learning and improvements are captured. This may result in changes to the overarching strategy and identified improvements to ensure it remains fit for purpose.

5.0 Legal implications

- 5.1 Wolverhampton Homes has a duty of care to the customers who live in, and those people who visit and work, the properties managed by the company.
- 5.2 Wolverhampton Homes is obliged to ensure that it delivers services effectively on behalf of the City of Wolverhampton Council. Therefore, effective response plans must be in place to manage incidents and disruptive challenges.

6.0 Human resources implications

- 6.1 Whilst there are no immediate human resource implications included in this report, it is imperative that staff understand the responsibilities of their roles in managing and responding to incidents.
- 6.2 The company also has a responsibility as an employer to ensure the safety of staff in their place of employment.
- 6.3 It is intended that regular training and awareness will be delivered to the Senior Leadership Team in a focused way to ensure managers have a good understanding of Business Continuity Planning and their responsibilities during incidents.

7.0 Health and safety implications

- 7.1 Wolverhampton Homes has significant obligations to ensure the health and safety of its staff, contractors and all customer groups who live and visit the properties managed.
- 7.2 Effective Business Continuity Plans are necessary to underpin our health and safety responsibilities when managing incidents.

8.0 Impact on the environment and community

- 8.1 It is important that Wolverhampton Homes is able to respond to or support the response to all incidents in a timely and effective manner to reduce the impact on the environment and community.

9.0 Long term consequences for the company

- 9.1 It is imperative that Wolverhampton Homes have effective business continuity plans and arrangements in place to safeguard the financial security of Wolverhampton Homes.
- 9.2 Whilst there are the appropriate insurances in place, there are risks and costs to the company if incidents are not managed effectively. These may include, service failure, injury or death, financial loss, or reputational damage.
- 9.3 It is considered essential to have an effective approach to managing serious incidents as part of the wider business assurance framework. This will help safeguard the long-term viability of the company.

10.0 Impact on business relationships with suppliers, customers and others

- 10.1 There are no immediate implications that impact on business relationships with suppliers, customers and others as a result of this report, but it is considered essential to have an effective approach to managing serious incidents in order to help safeguard these long-term relationships.

11.0 Appendices:

- 11.1 Appendix 1: Business Continuity Planning Strategy 2020 - 2022 (including the Corporate Business Continuity arrangements).

APPENDIX 1:

Business Continuity Planning Strategy 2020 - 2022

(including Corporate Business Continuity Plan)

Reference should also be made to:

City of Wolverhampton Council Resilience Team:

- Major Incident Response Plan
- Rest Centre Plan and Activation Flow Diagram

Wolverhampton Homes:

- Business Continuity Plans (Individual Service Areas)
- Recovery Plan

Version Control:

Plan Owner	Nicky Devey
Directorate	Business Support
Version Number	V1
Issue Date	TBC
Review Date	TBC

Administration and Document Control

This strategy is a controlled document and replaces all previous versions and will be reviewed in full on a bi-annual basis. Please destroy previous versions in a confidential manner.

Document Control			
Version	Date	Amendment	Authorised by

Business Continuity Plans (Individual Service Areas)

Copies of individual service area Business Continuity Plans are kept in both electronic and hard copy form by the Business Assurance Team.

All key managers will hold a separate copy of the plan for their individual service areas.

Foreword

Business continuity management can best be defined as:

‘An holistic management process that identifies potential impacts that threaten an organisation and provides a framework for building resilience with the capability for an effective response that safeguards the interests of its key stakeholders, reputation, brand and value-creating activities.’ (Business Continuity Institute, 2001.)

Business Continuity Planning (BCP) is a fundamental part of Wolverhampton Homes incident and response planning. It formulates how the business will function during periods of disruptive challenge or in the event of a major incident, and its recovery phase to return to ‘business as usual’ within the quickest possible time.

At Wolverhampton Homes we need to ensure that arrangements are in place for bringing events under control, maintaining critical business functions and the availability of appropriate resources to coordinate such proceedings. Our Business Continuity Strategy and Plans have been structured in a way that staff can quickly find and understand what is expected from them.

The objectives of this strategy are:

- To improve the resilience of each department within Wolverhampton Homes through understanding the business, identifying and managing varied operational risk inherent in the delivery of our services.
- To efficiently maximize the use of key organisational resources during periods of disruptive challenge or a major incident.
- To demonstrate organisational commitment to review all BCP arrangements to ensure they reflect the operational needs of Wolverhampton Homes.
- To work in conjunction with City of Wolverhampton Council to provide a Business Continuity framework detailing how Wolverhampton Homes will review, update and detail its response to any incident including longer term implications and measures.

Shaun Aldis
Chief Executive
Wolverhampton Homes

Angela Davies
Chair of the Board
Wolverhampton Homes Board

1.0 Introduction

- 1.1 It is vital that Wolverhampton Homes can maintain its core services with minimal disruption. The company's services, strategies and decisions are dependent on the fundamental concept of continuity of service. Business Continuity Management is the strategy that seeks to ensure the continuity and/or early restoration of all key services across the Council, during and following any disruption.
- 1.2 There is a need to ensure that adequate contingency and recovery measures are in place to protect the assets of the company to enable continued delivery of its business-critical services.
- 1.3 The Business Continuity Strategy, will be used to minimise the effects of disruption to business-critical services. Business Continuity Plans will therefore cover key assets, buildings, equipment, systems, staff and information.
- 1.4 The Executive Director has the ultimate responsibility for the implementation of BCP Plan and with the Senior Management Team will ensure that the requirements of this strategy and department plans are embedded across the organisation.

The Home Office definition of "Emergency"

"Emergency" is defined in Part 1 of the Act as: an event or situation which threatens serious damage to human welfare in a place in the UK, the environment of a place in the UK, or war or terrorism which threatens serious damage to the security of the UK¹:

- 1.5 Not all situations are determined as emergencies, however any period of disruptive challenge or incident can be a situation which:
 - Requires WH to respond in a manner outside its normal, day to day procedures and methods of work
 - Is limited in scale or area enabling a local response
 - Involves one or more service area
- 1.6 This strategy outlines why, how and to what standard Wolverhampton Homes will undertake Business Continuity across its services. By working closely with the City of Wolverhampton Council and relevant partners provides a greater chance of recovery to prevent, respond and mitigate emergencies that occur within Wolverhampton where it:
 - Arises with or without warning
 - Causes or threatens death, injury or disruption to normal life
 - Affects more people than can be dealt with under normal circumstances
 - Requires special mobilisation and organisations of resources

¹ Emergency Preparedness Part 1

2.0 Business Continuity Planning Strategy Context

2.1 Business Continuity arrangements will be implemented to maintain essential services and critical processes; protecting the company from loss of reputation, delivery of its customer services in the most cost-effective manner and in meeting its regulatory and legal requirements.

2.2 Its implementation of BCP seeks to ensure our customers continue to receive the services of Wolverhampton Homes when faced with an emergency or disruption.

2.3 The adoption of Business Continuity within Wolverhampton Homes has tangible benefits to routine service delivery and in response to an emergency. The ability to continue to provide services is fundamental to maintaining our Business Plan priorities by providing:

- Business Continuity plans to help increase the resilience of the company to disruptions; enabling it to continue to provide its services to its customers in the event of an emergency. During an emergency the reliance on its services is likely to increase.
- Through the promotion of Business Continuity advice and support, to all areas of the business, means the company can better prepare for a disruption to be able to effectively respond to an emergency and recover.
- The ability to continue to provide services is imperative; Business Continuity Management arrangements to ensure building, staff and resources are available during a disruption is vital.
- Close links with the City of Wolverhampton Council and other partner organisations ensures reciprocal support is available during disruption.

3.0 Business Continuity Planning Standard

3.1 The development of Business Continuity Management within Wolverhampton Homes will follow the principles of the Civil Contingencies Act 2004 Regulations and Guidance whilst working in consultation with the City of Wolverhampton Council's Resilience Unit, and utilising the corporate and operational risk registers to effectively assess risk

3.2 Each service area will be required to maintain a Business Continuity Plan, detailing back up locations and Action Cards to identify and prioritise their functions and resource requirements. The service area manager will be the **Plan Owner** and they are responsible for ensuring the plans completion, relevance and issue:

- **Plan Owners** may appoint a **Plan Author** to complete the plan on their behalf, however, the responsibility does not transfer;
- the **Plan Author** only takes on the task of collecting, collating and completing detail within the plan, as an additional work stream issued to them by their manager

- **Plan Owners** are responsible for ensuring staff are familiarised with the Business Continuity planning process

3.3 Generic roles and responsibilities are detailed within the Business Continuity Plan template; incident specific roles and responsibilities can be found within this plan.

4.0 Implementation, Monitoring and Review

4.1 The Business Continuity Planning Strategy aims to embed business continuity into the culture of the company and in order to achieve this it features throughout the organisation as a priority across the business.

4.2 Implementation of Business Continuity Management within Wolverhampton Homes is led by Business Services who will manage, support and provide advice and guidance during the quarterly review process.

4.3 A detailed monitoring sheet is also maintained and updated by the Business Assurance Team for each service area to ensure that their plans are current. Regular performance monitoring is provided to the Senior Management Team.

4.4 To effectively meet the changing needs of the company, business continuity arrangements will be regularly audited and reviewed.

5.0 Incident Notification

5.1 In the event of any disruptive challenge or in the event of a major incident Wolverhampton Homes will notify the City of Wolverhampton Council Resilience Team:

CWC Resilience Team: 01902 556560

Out of Hours (Concierge – 24hrs): 01902 652999

5.2 Should the incident include matters in regard to; buildings, liability, fleet and contents, or indemnity Insurance matters then notification to the City of Wolverhampton Council Corporate Insurance will be made immediately:

Corporate Insurance Manager – Telephone 01902 554567

5.3 Should the incident require Health and Safety advice and support, then notification to the City of Wolverhampton Council will be made immediately:

Health and Safety Lead – Telephone 01902 554058

6.0 Emergency Management Structure

6.1 In line with the City of Wolverhampton Council, Wolverhampton Homes have adopted an emergency management structure that is common of all Emergency Services divided into three management levels.

Emergency Management Structure	
STRATEGIC (GOLD)	<p>What we intend to do: Senior management structure responsible for strategic oversight of the emergency response.</p> <p>Required for serious and protracted major emergencies deciding on the long-term direction and levels of resource allocated to response.</p>
TACTICAL (SILVER)	<p>How we intend to do it: Coordinate the response across the organisation, perform tactical management of an incident, understanding of events at the scene, anticipating future requirements and deploying necessary resources.</p>
OPERATIONAL (BRONZE)	<p>Doing it: Designates those who are at the operational end of the response who physically undertake the actions required to prevent, reduce, control and mitigate the effects of an emergency.</p>

7.0 Definition of a disruptive challenge or major incident (this list is not exhaustive)

Main Scenarios	
No.	Incident Detail
1)	Any incident involving significant disturbance or suffering to customers
2)	The loss of any building under the remit of Wolverhampton Homes (access & contents)
3)	The loss of IT systems for a prolonged period dependent on the function and area impacted and where this is preventing staff from providing normal customer service
4)	Any incident within a High / Medium Rise property that is affecting more than one property
5)	A high percentage of staff unable to work

CORPORATE BUSINESS CONTINUITY PLAN

8.0 Emergency Response Procedures – Main Scenarios

- 8.1 The Chief Executive and Senior Management Team members have the authority to declare any incident as a ‘disruptive challenge’ or a major incident’, taking into account corporate and operational risk management.
- 8.2 Wolverhampton Homes have identified 5 main scenarios, which would be classed as disruptive challenge or a major incident.

Response Levels:

All of the above main scenarios could be categorised into the three levels below:

Level	Detail	Notification
Level 1	Normal Out of Hours Emergency Response (e.g. where the Concierge Service / 24hr Call Centre can manage the response)	The Out of hours Duty Manager will be notified.
Level 2	Moderate Incident (e.g. Fire damage/service disruption)	A member of the Senior Management Team will be contacted immediately upon notification of the incident or event occurring.
Level 3	Major Emergency (e.g. significant disturbance or suffering to residents)	It will be the decision of the Duty Senior Manager to determine if other members of staff should be notified and where required this will be completed using the Wolverhampton Homes cascading principles.

9.0 Major Emergency / Incident or Disruptive Challenge Declared – Tiered Response

- 9.1 Where the incident or event is declared as a ‘Major Emergency’ or there is expected ‘Disruptive Challenge’, the Duty Senior Manager will form a Response and Recovery Team (RRT) see Section 10.
- 9.2 The RRT will consist of officers relevant to the incident response requirements and will be identified by SMT at the point of the incident.

- 9.3 For contact purposes for setting up the RRT, the company's telephone cascade process should be used.
- 9.4 Each scenario and response requirements will differ – the tables below provide guidance on which staff will be required at each level. This list is not comprehensive.

Scenario 1	
INCIDENT INVOLVING DISTURBANCE OR SUFFERING TO CUSTOMERS	
Strategic	Chief Executive Senior Management Team
Tactical	Head of Business Services Business Assurance Manager Marketing and Customer Insight Manager
Operational	Maintenance Manager Homes Direct Manager Assistant Neighbourhood Services Manager Housing Manager Assistant Managers (Maintenance) Estate Custodians Response and Recovery Team Contractors
Scenario 2	
LOSS OF ANY BUILDING UNDER THE REMIT OF WOLVERHAMPTON HOMES (ACCESS & CONTENTS)	
Strategic	Chief Executive Senior Management Team
Tactical	Head of Business Services Business Assurance Manager Marketing and Customer Insight Manager Head of Construction Head of Service – Housing Options Housing Manager
Operational	Maintenance Manager Homes Direct Manager Assistant Neighbourhood Services Manager Assistant Managers (Maintenance) Estate Custodians Response and Recovery Team Contractors

In the event of the destruction of a Housing Site / Scheme

The full or partial destruction of a housing site or scheme may result in residents being evacuated or without any immediate accommodation.

In that the affected residents would be statutorily homeless, it would be necessary to use any available solutions to provide as temporary accommodation e.g. where appropriate - Wolverhampton Homes void properties, or a hotel, Bed and Breakfast or other Registered Social Landlords / private landlord property, if available.

All persons deemed homeless as a result of an emergency are treated as a priority.

The Assistant Director for Housing Options would be the lead for discharging rehousing responsibilities.

Scenario 3

THE LOSS OF IT SYSTEMS FOR A PROLONGED PERIOD

Strategic	Chief Executive Senior Management Team
Tactical	Head of Business Intelligence Head of Business Services Business Assurance Manager Marketing and Customer Insight Manager Housing Manager
Operational	Systems Development & Support Manager Homes Direct Manager Assistant Neighbourhood Services Manager Estate Custodians Response and Recovery Team Contractors

Scenario 4

ANY INCIDENT WITHIN A HIGH OR MEDIUM RISE PROPERTY

Strategic	Chief Executive Senior Management Team
Tactical	Head of Business Services Business Assurance Manager Marketing and Customer Insight Manager

Operational	Homes Direct Manager Assistant Neighbourhood Services Manager Housing Manager Estate Custodians Response and Recovery Team Contractors
Scenario 5	
A HIGH PERCENTAGE OF STAFF UNABLE TO WORK	
Strategic	Chief Executive Senior Management Team
Tactical	Head of Business Services Business Assurance Manager Marketing and Customer Insight Manager
Operational	Assistant Neighbourhood Services Manager Homes Direct Manager Housing Manager Estate Custodians Response and Recovery Team Contractors (Agency provision)

10.0 Roles and Responsibilities

10.1 A breakdown of staffing roles and responsibilities are detailed in the tables below:

Roles and Responsibilities
Chief Executive, Chair of the Board and the Assistant Director Corporate Services.
<p>To remain as Gold Command Leads in all matters relating to:</p> <ul style="list-style-type: none"> • Public Announcements • Press and television interviews • Agreeing strategic decision making • Ensure the company is acting within the parameters of its management agreement, regulatory and legal requirements throughout the duration of any period of disruptive challenge or major emergency • Providing high level liaison with the City of Wolverhampton Chief Executive as the lead strategic command structure (Gold Command)

Senior Management Team (SMT)

Lead in all matters relating to Strategic Response:

- First point of contact and then responsible for the cascade of information
- Key strategic decision makers including:
 - Forming of the RRT
 - Providing high level liaison with City of Wolverhampton Council Emergency Response Management team and any associated strategic command structure
 - Providing appropriate direction to Wolverhampton Homes personnel
 - Sign off of all external media communications
- Liaison with the Board Chair and members, and elected members as appropriate

Assistant Director – Housing

Specialist lead for all matters relating to tenants and residents:

- Evacuation of residents and operation for rest centres
- Liaison with a range of key operational partners including; NHS; City of Wolverhampton Council's Emergency Response Management Team, Rest Centre Manager, Housing Manager and Social Care Services as appropriate
- Liaison with the RRT to support communications with those residents affected and their next of kin
- Liaison with RRT to ensure that the appropriate response is being delivered
- Deployment of Wolverhampton Homes personnel to deliver emergency response and identify medium, and longer-term requirements
- Reporting additional resource requirements to Senior Management Team
- Directing staff to support interim rest centre responses; decant procedures; and the arrangement of Temporary Accommodation
- Medium and longer term tenancy support
- Switch to Out of Hours' telephone provision

Assistant Director – Property / Assistant Director – Building Services

Specialist lead for all matters relating to asset management and landlord health and safety:

- Liaison with a range of key operational partners including; NHS; City of Wolverhampton Council's Emergency Response Management Team, Rest Centre Manager, Housing Manager and Social Care Services as appropriate
- Liaison with a range of key operational partners including; NHS; City of Wolverhampton Council's Emergency Response Management Team, Rest Centre Manager, Housing Manager and Social Care Services as appropriate
- Liaison with the RRT to support communications with those residents affected and their next of kin
- Liaison with RRT to ensure that the appropriate response is being delivered.

- Deployment of Wolverhampton Homes personnel to deliver both the emergency response and identify medium and longer term requirements
- Reporting additional resource requirements to Senior Management Team
- Ensuring an effective response from contractors to deliver appropriate health and safety work including making safe works
- Provision of appropriate equipment to support an emergency response such as sandbags; generators and access to suitably qualified trades operatives to deliver emergency works

Assistant Director – Housing Options

Specialist lead for all matters relating to Housing Options, housing and tenancy support, homelessness and rehousing responsibilities:

- Evacuation of residents and operation for rest centres
- Liaison with a range of key operational partners including; NHS; City of Wolverhampton Council's Emergency Response Management Team, Rest Centre Manager, Housing Manager and Social Care Services as appropriate
- Liaison with the RRT to support communications with those residents affected and their next of kin
- Liaison with RRT to ensure that the appropriate response is being delivered
- Deployment of Wolverhampton Homes personnel to deliver emergency response and identify medium and longer term requirements
- Reporting additional resource requirements to Senior Management Team
- Directing staff to support interim rest centre responses; decant procedures; and the arrangement of temporary accommodation
- Medium and longer term rehousing support

Assistant Director – Corporate Services

Lead for cascade to key personnel, health and safety matters and business recovery:

- Support to the Senior Management Team in respect of any staffing matters including notification to next of kin
- Welfare of staff involved in or dealing with an incident response
- Direct the requirements of the City of Wolverhampton Council's Health and Safety Lead in specialist Health & Safety support and advice for all staffing matters
- Deployment of Wolverhampton Homes staff to deliver both the emergency response and support the recovery
- Identify medium and longer term requirements for recovery and response
- Reporting additional resource requirements to Senior Management Team

Head of Business Services

Responsible for communications and direct support to the Response / Recovery Team:

- Activation of the Crisis Communication Plan
- First point of contact for any media enquiries and for developing suitable external communications
- Leading the liaison with City of Wolverhampton Council Communications Team
- Provision of appropriate administrative support to SMT and the RRT
- Production of regular and timely Situation Reports
- Reporting additional resource requirements to Senior Management Team
- Supporting the Chief Executive, the Chair of the Board and SMT in coordination and delivery of emergency response procedures
- Facilitation of Incident Debrief following any activation of this strategy or associated Business Continuity Plans
- Direct the requirements of the City of Wolverhampton Council's Health and Safety Lead in specialist Health & Safety support
- Direct the requirements of the City of Wolverhampton Council's Health and Safety Lead in specialist Financial support and advice
- Deployment of Wolverhampton Homes personnel to deliver both the emergency response
- Identify medium, and longer-term requirements for recovery and response
- Reporting additional resource requirements to Senior Management Team

Head of Business Intelligence

Lead for all matters relating to ICT infrastructure; operational implementation of disaster recovery procedures and support for efficacy of mobile working:

- Support from the City of Wolverhampton Council in the delivery of any recovery and necessary relocation to support IT requirements
- Liaison with RRT to support mobile working and maintaining system connectivity
- Deployment of Wolverhampton Homes staff to deliver both the emergency response
- Identify medium and longer-term requirements for recovery and response
- Reporting additional resource requirements to Senior Management Team

Business Assurance Manager

Lead for all matters relating to Insurance and Procurement:

- Direct reporting and liaison with Wolverhampton Homes insurers
- Monitoring of all spend associated with the incident
- Collating information for production of regular and timely Situation Reports

- Overseeing procurement requirements in the event of disruptive challenge or a major emergency

Response and Recovery Team (RRT)

Overseen by SMT the RRT will:

- Liaise on site with a range of key operational partners including; NHS; City of Wolverhampton Council's Emergency Response Management Team, Rest Centre Manager, Housing Manager and Social Care Services as appropriate
- Provide communication and progress updates on all events and actions undertaken during the incident
- Provide instruction as to the way forward
- Carry out actions to support the incident response and recovery

11.0 Incident Response and Procedures

- 11.1 In the event of any disruptive challenge or in the event of a major incident, the following procedures will be actioned – this will be supported by the individual scenario Incident Response Flow Charts:

Incident Response

Activation of the Business Continuity Strategy

The activation of the Business Continuity Strategy and associated Business Continuity Plans will be agreed by the Senior Management Team who have designated responsibility to declare an incident as a Disruptive Challenge or a Major Incident.

This will activate the following actions as required and at the appropriate time.

Evacuation Procedures

In the event of an evacuation:

Mobile Working Hub / Temporary Accommodation Building:

- Evacuation procedures relevant to each site are displayed at each site that is managed by Wolverhampton Homes and specific Fire Risk Assessments are completed
- Should a building need to be evacuated, all staff / residents should be evacuated following normal procedures
- It is of obvious importance that as many staff/residents as possible are accounted for, as quickly as possible through the use of staff emergency cascading system, core business systems e.g. Northgate

Residential Area / High-Rise / Medium Rise:

- Evacuation will be led by the emergency services
- Wolverhampton Homes staff will support the response
- Transport and welfare arrangements will be facilitated in conjunction with the City of Wolverhampton Council Resilience Team
- Should alternative accommodation the City of Wolverhampton Council will be requested to activate the Rest Centre Plan to provide temporary arrangements (CWC Rest Centre Plan)

Emergency Office - Strategic Control Room

Establishment of an emergency operations base

In the event of any disruptive challenge or major emergency at any Wolverhampton Homes Community hub Stowlawn CMC will be the initial designated emergency office – in the event Stowlawn CMC is affected then an alternative base will be considered and proposed.

Location of office:

- Stowlawn Control Management Centre
Parkview Road
Stowlawn
WV14 6HB
- Consideration will be given to the requirements of the service including options for rental of Temporary Accommodation for short / long term requirements, or use of other WH office sites where this meets the needs of the service / customers
- Office space will be sought initially, through the City of Wolverhampton Council Corporate Landlord as well as considering use of local Tenant Meeting Rooms for use, if necessary
- Should all alternative options fail, the hiring of a room at a local hotel / or a request to partner agencies will be made to see if space within their offices could be utilised in the immediate short-term response and recovery phase

Emergency Stock Room

The emergency stock room facility holds a number of items that may be required in the event of any disruptive challenge or major emergency:

Location of office (Access via Concierge):

- Winston Churchill Court
Stowlawn
WV14 6HF

- Supplies are retained at this site for use during emergency incidents.
- Keys are retained at Stowlawn CMC (Control Room)
- Stock is monitored on a monthly basis and replenished accordingly
- A full stock inventory is held

Contacting Wolverhampton Homes Staff

Staff who are not at work:

Staff who are not in work should be contacted to advise them of the situation and to be given instructions for the next working day.

Information Cascade System:

The cascading system has been adopted to facilitate contacting staff in an emergency:

- The system is devised to allow fast and effective communication between individuals or throughout Wolverhampton Homes in an emergency
- The basis of the system is to make individual members of staff responsible for making contact with a key number of colleagues with which they work closely
- The onus is on all members of staff to ensure they maintain the correct contact details for their colleagues with which they are linked.
- It is unlikely that an event will occur, out of office hours, where all members of staff must be contacted, however, an example would be the loss or destruction of an office, and it is important that WH have a system in place to contact everyone in such an emergency.

Mobile Phones and Staff Contact Details:

Staff who have been issued a company mobile phone should ensure it is available for use in the event of a major emergency or period of disruptive challenge. This is to provide resilience in the event where there may be limited landline capabilities available.

Company Mobile phone numbers are held separately as part of the Business Continuity Contact List.

To facilitate this each member of staff must retain the mobile telephone numbers of the following:

- Their Line Manager
- Any reporting officers

Holding this information facilitates a cascade and contact system, whereby all members of staff could be notified if the need arose, without reliance on networked or paper-based contact details. This is to be able to inform staff of any serious situation and support requirements.

Senior Management Team will hold contact details of key staff who may be required in an emergency situation. Access to these details will be retained electronically on SMT smart devices.

In addition, the HR Team have the ability to access individual's contact details remotely if necessary. It would however not be practical to access the details of a large number of people quickly and the cascading system must take precedence.

It is unlikely that an event will occur out of office hours, where all members of staff must be contacted, however, an example would be where there is a major impact upon Wolverhampton Homes or its customers.

Board Members:

The Chief Executive and Business Assurance Team hold the contact numbers for all Board members.

GDPR

Staff Personal Contact Details:

Staff personal contact details are for the explicit use of establishing contact in the event of a disruptive challenge or a major emergency. Under no circumstances will personal contact details to be given or passed to any person outside of Wolverhampton Homes, without the express authority of the individual(s) concerned.

Any misuse of the information may result in disciplinary action being taken.

All data used during any period of disruptive challenge or a major incident will be used in accordance with GDPR requirements.

Health and Safety Requirements

In the event of any major incident the response is usually led by the emergency services. Where this is the case, upon arrival Wolverhampton Homes staff should report to the Rendezvous Point (RVP) identified by the emergency services.

In the event that Wolverhampton Homes staff are leading the response – full and appropriate risk assessment protocols must be utilised at all times:

- Support for staff will be made available throughout any incident
- It should be noted that no staff members are allowed into any building or incident site / area, until this has been declared safe by the relevant authorities
- In addition, no equipment should be removed from the recovery site by any member of staff, without the authority of a Senior Management Team member
- Additional PPE and supplies are available from the Emergency Stock Room housed at Winston Churchill, Stowlawn

Attendance at an Incident Site

As there may not be a member of staff on site at the time of the incident, this may initially be managed and co-ordinated by either the Fire Service or Police attending the scene.

Upon arrival, staff from Wolverhampton Homes should in conjunction with the lead emergency service endeavour to account for everyone present by clarifying the information with the data held by Wolverhampton Homes.

In line with emergency response procedures a Wolverhampton Homes lead should be identified and take responsibility for tactical management of the Wolverhampton Homes response.

Health and Safety is of primary importance and all steps should be taken to ensure appropriate risk assessment protocols are utilised at all times.

Keyholders

Where the site / building is under the management of Wolverhampton Homes the keyholder may be the first staff member to arrive at the scene.

Where the emergency services have been requested to attend, the member of staff should not enter the premises until their arrival.

In all cases, the out of hours Security Provider must be contacted either directly or via the Concierge Control Centre (24hrs).

The keyholder should also contact a member of the Senior Management Team who will decide, which other staff members should be contacted, as deemed appropriate to the situation.

Incident Log - Documenting Actions Taken

All staff members should use the Incident Log Sheets supplied in each Business Continuity Plan.

This is to ensure events and actions which have taken place following the notification of the disruptive challenge or major incident are appropriately detailed.

This provides an audit trail as part of the response documentation to assist with the response and recovery, the debrief, insurance claims and other evidence required by the emergency services or regulating body.

All Incident Log Sheets should be passed to Business Assurance Team for collation as part of the emergency response records.

Crisis Communications

Effective communication is a vital element to Wolverhampton Homes response to an emergency incident and how we inform all stakeholders as to the scale, response and the levels of disruption in services.

- In the event of a period of disruptive challenge or an emergency the Crisis Communications Plan will be activated by the Head of Business Services or the Marketing and Customer Insight Manager (staff & stakeholders / external)

To ensure an effective and co-ordinated approach to communications during the entire incident, for concise and clear messages, correct communication channels are to be used and roles will be established to identify who will deliver communications to different customer and stakeholder groups.

Office Hours | **8.30am – 5.00pm (Monday – Thursday)**
8.30am – 16.30pm (Friday)

During office-based hours communication will be led by Marketing & Customer Insight Team who will respond (with the authorisation from Senior Management Team) to any disruptive challenge or in the event of a major incident.

Out of Hours | **Evenings, Weekends and Bank Holidays**

The incident notification to Wolverhampton Homes may be in the first instance via the Out of Hours Contact Centre, media, emergency services or by internal colleagues.

Depending upon the severity of such an incident, Senior Management Team will decide how and from whom the cascade of notification and information will be delivered.

Staff Communications

The Senior Management Team will aim to update all staff on a timely basis regarding the current situation.

This may take the form of internal communication via the most appropriate method available. Whatever form the communication takes, the aim will be to provide all staff with as much information as possible regarding the period of disruptive challenge or major emergency, how the company are dealing with the response and recovery and the impact on business as usual.

Dealing with the Press

All enquiries from the Press and Media are to be dealt with by a member of the Senior Management Team, the Head of Business Services, or the Marketing & Customer Insight Manager.

A press release will be prepared by the Marketing & Customer Insight Manager with the Senior Management Team as soon as possible following the start of the incident.

Staff are reminded that they should **NOT** speak directly to the Press or comment on Social Media.

All calls and enquiries should be passed to either the Marketing and Customer Insight Manager, Head of Business, or to a member of the Senior Management Team. This instruction applies to all third parties working on behalf of Wolverhampton Homes, such as contractors, consultants, and partners who are expected to abide to this instruction.

There is most likely to be high media interest if there is a human-interest angle e.g. threat to life, evacuation, reputational issue, vulnerable customers impacted, or an incident involving a member of staff.

Evacuation and Rest Centres

Where there is displacement or evacuation affecting our customers, this may require the opening of a Rest Centre to provide Temporary Accommodation and basic welfare facilities (including shelter, food and clothing) following any major emergency/ incident.

Rest Centre have been identified by the City of Wolverhampton Council across the City for evacuees via the City of Wolverhampton Council. Wolverhampton Homes will have access to these facilities which would also be supported by the council's external provider (e.g. British Red Cross).

Activation via:

- **CWC Resilience Team: 01902 556560**
- **Out of Hours (Concierge – 24hrs): 01902 552999**

Contacting Relatives or Next of Kin

The attending Housing staff will assist residents in making contact with their relatives or next of kin, to enable them to go to a safe place for rest and warmth, if they do not require medical treatment.

Details should be obtained from the customer of the name and address of the person with whom they will be staying, together with contact telephone numbers and relationship details.

Residents should be asked to advise Wolverhampton Homes if any details change.

Contacting Contractors and Suppliers

It may be necessary to procure goods and services in a very short timescale following a disruptive challenge or in the event of a major incident.

Therefore, key contractors and suppliers should be contacted, where there is the potential their services or products will be required, to put them on stand-by for whatever help or assistance may be required.

Potential BCP requirements form part of normal contract management arrangements including for out of hours assistance and obtaining emergency supplies at short notice.

IT Systems and Access – Disaster Recovery / Mobile Working

Disaster Recovery:

IT Business Continuity arrangements are in place to implement the recovery of core business systems, key functions and supporting data in the event of a total loss of the main IT facility, the requirements regarding any potential loss of data and the time to restore key business systems.

Wolverhampton Homes has in place a Service Level Agreement for the provision of its IT and equipment – this is provided by the City of Wolverhampton Council.

The Head of Business Improvement would lead the IT recovery arrangements in conjunction with the City of Wolverhampton Council's IT department and the Resilience Team. Action would be proportionate in consideration of the key facts related to the nature of the problem and likely timeframe before normal service can be resumed at the main IT facility.

I.T. Access and Mobile Working:

Access to Wolverhampton Homes systems can be made via the internet, dependent on the source and impact of the system failure. Where there is sufficient resource this will allow for a connection via another site.

Mobile working is in place for teams to work remotely using work equipment (laptops, tablet devices or smart phones). This will meet initial immediate requirements and if and when necessary new equipment can be purchased as required.

Arrangement of Working Patterns (including the Response and Recovery Team)

During an incident to enable an effective response and recovery, Wolverhampton Homes may implement different working arrangements.

This may include differing shift patterns, or the requirement for some staff members to work from home, where there are the facilities to do this.

Any changes to normal working patterns and arrangements will be at the discretion of SMT and will be agreed with relevant staff members.

It is imperative that staff attending the incident or supporting the response, adhere to shift change schedules on a 4/5 hourly basis to ensure staff remain resilient throughout.

Shift change schedules will be established at the initial attendance on site by the RRT.
Staff will also be made aware of these instructions and any handover requirements.

12.0 Identification of Business-Critical Functions

- 12.1 There are a number of business-critical services and functions that Wolverhampton Homes provides, which are fundamental to the delivery of its operations, without which the business could not continue to function properly.
- 12.2 The business-critical functions provide a core service to residents and are of major importance, not only to stakeholders, but to Wolverhampton Homes.
- 12.3 It is imperative that SMT and the RRT ensure that functions are operational as soon as possible following any disruptive challenge or a major emergency.

CRITICAL FUNCTIONS	SERVICE FUNCTION
Core Business Systems (IT)	<ul style="list-style-type: none"> • IT provision and core business systems
Customer Contact and Feedback including: <ul style="list-style-type: none"> - Concierge - Customer Feedback Team - Homes Direct - One Stop Shops - Out of Hours Contact Centre - Telecare Communication and Feedback including: <ul style="list-style-type: none"> - Communications Team - Marketing and Customer Insight 	<ul style="list-style-type: none"> • In the response to customer enquiries – ensuring Homes Direct remains operational within 4 hours • Transportation of staff to relocate the service to limit any downtime • Frontline services providing contact with customers • Customer Communication • Customer Feedback
Financial	<ul style="list-style-type: none"> • Agresso functions (Business) • Accounts Payable (Purchasing & Invoices) • Payroll & BACS (Staffing) • Processing rent payments (Income)
Housing Management	<ul style="list-style-type: none"> • Voids • Lettings • Allocations • Tenancy Terminations

	<ul style="list-style-type: none"> • Homelessness Services • Temporary Accommodation • Waiting lists and commencements with resource to respond
Maintenance	<ul style="list-style-type: none"> • Monitoring & reporting of repairs including IT provision • Deployment of resource to respond • 24hr Repairs Service
Regulatory and Legal	<ul style="list-style-type: none"> • Statutory Requirements • Compliance services
Employee	<ul style="list-style-type: none"> • Operational requirements • Staffing arrangements • Shift change requirements

13.0 Wolverhampton Homes Office Locations and Responsible Managers

- 13.1 Wolverhampton Homes office locations have a named responsible manager for each Community Hub.
- 13.2 With the company undertaking mobile working across the business this provides added resilience should there be a reduction in available office accommodation.

OFFICE LOCATIONS	RESPONSIBLE MANAGER
Bilston – One Stop Shop and Office Church Street Bilston WV14 0AP	Housing Manager
Heath Town Boiler House 290 Chervil Rise Heath Town Wolverhampton WV10 0HR	Head of Building Services
Low Hill Office Showell Circus Wolverhampton WV10 9JL	Housing Manager
Market Street – One Stop Shop and Office 28 Market Street Wolverhampton WV1 3AG	Housing Manager

Merry Hill Office Leasowes Drive Merryhill Wolverhampton WV4 4PZ	Housing Manager
Parkfields Office Rough Hills Road Wolverhampton WV2 2HH	Maintenance Manager
Stowlawn Office Middleway Green Wolverhampton WV14 6DJ	Head of Stock Investment & Commercial Services / Head of Construction
Stowlawn Control Management Centre Parkview Road Bilston WV14 6HF	Assistant Neighbourhood Services Manager
Tarmac Office Tarmac Road Wolverhampton WV4 6JW	Homes Direct Manager / Maintenance Manager
Wednesfield – One Stop Shop and Office Alfred Squire Road Wednesfield Wolverhampton WV11 1XU	Head of Housing Solutions

14.0 Stand down of the Business Continuity Planning Strategy, Associated Business Continuity Plans and Return to New Normality

- 14.1 The SMT member contacted at the initial stage will decide the extent of the event and will designate it as a Disruptive Challenge or a Major Emergency or otherwise.
- 14.2 Proportionate incident response actions will be taken, as specified by the SMT member and delegated to appropriate staff, in order to overcome the occurrence.
- 14.3 Where this plan has been instigated as a working document the SMT will stand down the RRT and cessation of the incident response actions. This will mean the move to the recovery phase and return to new normality.
- 14.4 Before standing down, SMT will determine how this is to be communicated to staff, customers and other relevant stakeholders.

15.0 Incident Debrief and Evaluation

- 15.1 Incident evaluation will be reviewed at 4hr, 12hr, 24hr and 48hr intervals and evaluation periods may be revised dependent upon the severity of the incident.
- 15.2 Incident Debrief Meetings will follow within 3 to 14 days of the incident where practicable. SMT will advise all relevant staff who are required to attend.

Board Report

	Agenda Item 8
	24 April 2020 Allocations Policy Briefing Report
	Open Report
Status:	For Information
Author and job title:	Henry Gregory, Housing Customer Insight Manager (CWC)
Contact No:	01902 555159
Recommendations:	Board Members are asked to note the approved changes to the Housing Allocations Policy.
Key risks and contentious issues:	Changes to applicant's banding.

Management Summary

1.0 Purpose

- 1.1 The purpose of this report is to provide an overview of the revised Allocations Policy 2020 (Appendix 1), which was approved by the City of Wolverhampton Council's Cabinet on 19 February 2020.
- 1.2 The Policy incorporates the approved policy changes that are not reliant on the rebuild of the Northgate system. These will be in place until February 2021, when the fully revised Allocation Policy will be implemented following the rebuild of the Northgate system.

2.0 Background

- 2.1 Local Authorities are required by the Housing Act 1996 to have a scheme for determining priorities, and the procedure to be followed, in allocating housing accommodation both to first time applicants and transferring tenants including nominations to Registered Providers (Housing Associations); the Allocations Policy. The Council's Allocations Policy as a Choice Based Letting (CBL) scheme was adopted in 2007 and has been subject to periodic updates to ensure it stays abreast of changing legislation and external challenges. It was last amended in April 2018 to account for new duties introduced through the Homelessness Reduction Act.
- 2.2 City of Wolverhampton Council (CWC) own 22,280 properties within the city, that are managed across five managing agents; Wolverhampton Homes and the City's four Tenant Management Organisations (TMOs), who are all required to allocate and let the properties they manage in accordance with the Allocation Policy. Of these Council owned homes, 1,537 became available to let during 2018-2019; a number which reduces year on year. This is compounded by an average loss of 250 properties per year through the Right to Buy. This serves to reduce the number of people that can be assisted into homes through the Council's scheme, but with 8,700 households on the housing register (as at November 2019) of which half are assessed as having no housing need, there is also a need to manage people's expectations.
- 2.3 Since the introduction of the Homelessness Reduction Act in April 2018 there has been an increase in the number of households being placed in temporary accommodation and notably the use of Bed and Breakfast to accommodate larger families, exerting greater demand on those homes that do become available to relieve pressure for those most in housing need.
- 2.4 The first wholesale review of the current Allocations Policy was initiated in January 2019. A steering group was established with representation from Housing Strategy, Legal Services, Wolverhampton Homes and the City's Tenant Management Organisations (TMOs), who worked through a range of evidence and analysis which demonstrated the increased demand and reduced supply of social housing, as well as case law and guidance, which concluded that the current Allocations Policy as a CBL scheme remains fit for purpose but could be improved to better meet the current needs of the City's residents most in need of affordable housing. Based on the work of the steering group a number of proposed changes to the Allocations Policy were put forward for consultation.

- 2.5 The final recommendations were presented to the Vibrant and Sustainable City Scrutiny Panel on 30 January 2020 for pre-decision scrutiny prior to full Cabinet approval on 19 February 2020.

Implementation

- 2.6 In order to implement the full Allocations Policy, significant structural changes will be required to the housing management system, Northgate, that is used to maintain the housing register and advertise and allocate properties. The role of the steering group has been extended, with the additional membership of Wolverhampton Homes Systems Development to manage this process, which will include a system build, user testing, training and implementation.
- 2.7 In addition to changes to the IT system, a number of operational actions will also be required. All existing applicants will need to be reassessed, including the applicants in Band 4 to ensure their circumstances have not changed or that they meet any new qualifying criteria and should be reassessed into a remaining Band. This will be supported with a robust communications plan and support available for any vulnerable applicants so that all applicants in housing need are assessed and awarded the appropriate level of priority on the housing register. Applicants will have the usual recourse to a formal review should their Band change or they are assessed as having no housing need and it is anticipated that there will be a temporary uplift in officer time for associated reviews, front end training and enquiries.
- 2.8 Project management of the IT and operational changes necessary to implement the recommendations is planned to take 12 months. The Cabinet report sought delegated authority to the Cabinet member for City Assets and Housing, in consultation with the relevant Director to approve any changes to the final Allocations Policy necessary due to structural constraints of the IT system that are not able to support implementation of minor aspects of the recommended changes.
- 2.9 A number of changes have been identified that are not reliant on amendments to the Northgate IT system and are required to be made before February 2021 to help fulfil the service's strategic aims. It was recommended that the following changes are implemented from April 2020, therefore the existing Allocations Policy has been amended and published to include the following amendments:
- The updated policy objectives
 - A new banding for foster carers and adopters to give them additional priority where a larger property is required in order for them to foster or adopt
 - Directly allocating properties that have been purchased by the Council for the purposes of estate redevelopment or renewal approved as part of separate Cabinet approval
 - Priority for residents living in Houses of Multiple Occupation (HMO) to be limited to families with children and people of pensionable age
 - Reducing the number of offers that can be refused from three to two before suspending an application for six months

- Priority for ground floor flats being limited to applicants with a requirement for level access housing
- The removal of offering priority to applicants in two properties moving into one property due to its under usage
- The removal of an automated phone line for placing bids; the least used method with several alternative methods in place
- In the event of a large-scale City emergency, CWC reserves the right to allocate any available properties outside of the Allocations Policy

2.10 The implementation of the revised Allocations Policy will be overseen by CWC's Better Homes Board, which is chaired by the Director for City Environment and includes representation from the Chief Executive of Wolverhampton Homes and the TMOs.

3.0 Financial and value for money implications

3.1 There are no financial implications for the implementation of the 2020 Allocations Policy as costs relating to changes in waiting list eligibility can be met from existing budgets.

4.0 Legal implications

4.1 The Council as a Local Housing Authority is required to allocate housing accommodation in accordance with Part VI of the Housing Act 1996. Section 167 of the Act requires the Authority to have an allocation scheme and to allocate housing accommodation in accordance with the Scheme.

5.0 Human resources implications

5.1 Implementation of the revised Allocations Policy will come from existing CWC, Wolverhampton Homes and TMO officers.

6.0 Health and safety implications

6.1 There are no health and safety implications arising from this report.

7.0 Equalities implications

7.1 An equalities analysis has been undertaken, which demonstrates the positive intentions of the changes to the Allocations Policy. There will be ongoing liaison with CWC's Equalities Team throughout the development and implementation phase of the Allocations Policy to ensure applicants are clearly communicated with and are supported in the reassessment of their housing application where needed, so that those vulnerable people with housing needs receive the appropriate priority on the housing register.

8.0 Impact on the environment and community

8.1 There are no environmental implications arising from this report.

9.0 Long term consequences for the company

- 9.1 The long-term consequences for the immediate changes to the Allocations Policy are minimal and can be picked up as part of business as usual activities.
- 9.2 As part of the implementation of the fuller policy review from February 2021 there will be some implications on resources, with an increase in reviews expected with the removal of Band 4.

10.0 Impact on business relationships with suppliers, customers and others

- 10.1 Within the changes to take effect from April 2020, there is a need to communicate with customers and work with agencies that support particular groups to ensure successful implementation. For example, officers from CWC and WH have met with the Manager of the Foster Placements team at CWC to develop a process for the Band 1 award for foster carers and approved adopters.
- 10.2 The changes in the number of refusals will need to be communicated to applicants and agencies that support more vulnerable groups.
- 10.3 In addition we will need to communicate to those applicants who currently have priority for a ground floor flat based on age or singles and couples with priority because they live in a HMO the change in status of their application.
- 10.4 There is no impact on suppliers on the changes that will take effect from April 2020. Additional resource will be bought in from Northgate for the system build for the changes that will take effect by February 2021.

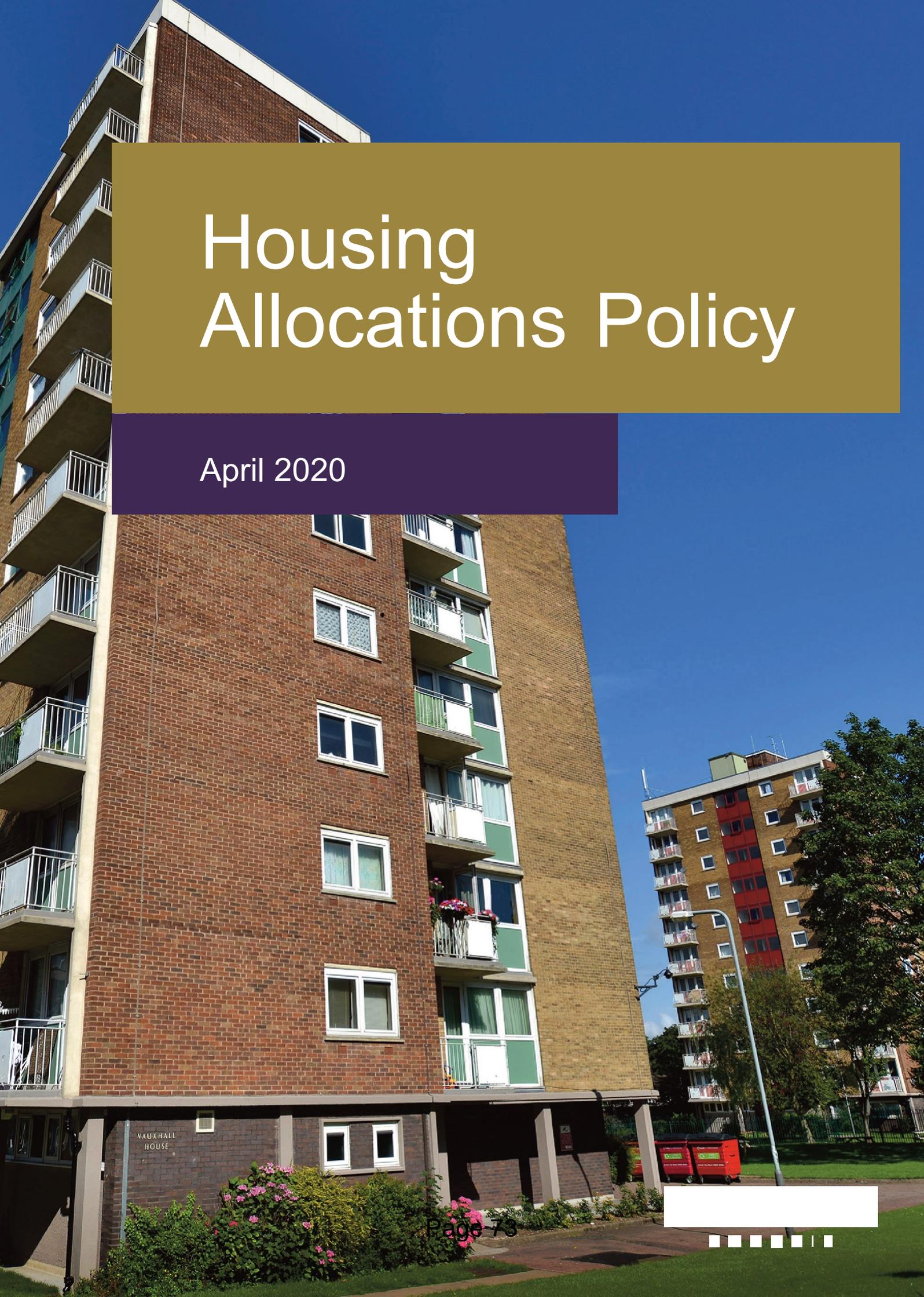
11.0 Impact on Wolverhampton Homes' Management System

- 11.1 The policy changes identified in this report have no impact on the Wolverhampton Homes' Management System.

12.0 List of Appendices

- 12.1 Appendix 1 - Housing Allocations Policy – 2020

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A tall, multi-story brick apartment building with balconies, set against a clear blue sky. The building has a mix of red and tan bricks. In the foreground, there are some green bushes and a red recycling bin. Another similar building is visible in the background to the right.

Housing Allocations Policy

April 2020

VAUXHALL
HOUSE



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Introduction

This document contains details of the scheme that Wolverhampton City Council uses in deciding between competing applicants for housing as required by s166A Housing Act 1996.

This Policy records, collects and takes account of individual's needs and requirements in order to allocate housing to those that need it most.

This Policy does not discriminate against any person on the grounds of race, gender, sexuality, age, class, appearance, religion, responsibility for dependents, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.

This policy applies to:-

- Existing tenants who want to transfer from one tenancy to another
- New applicants
- Nominations to Registered Providers

At the time of writing this policy, the Council had a housing stock around 23,000 properties.

Approximately 1,800 properties will become available for re-letting in a year and, at any one time; there are about 12,500 applicants on the housing register with around 6,500 with a housing need. Many applicants have no realistic prospect of receiving a council home.

The Council recognises that it alone will never meet the demand for affordable rented accommodation in the city. The Council also works to encourage applicants to explore all options for housing open to them but it aims to make the best use of the limited vacancies which become available.

The objectives of the policy are to:-

- i. Ensure people in the greatest housing need have the greatest opportunity to access suitable housing that best meets their needs.
- ii. Make use of a range of housing options and tenures to prevent and relieve homelessness.
- iii. Make best use of the Council's and partner registered providers housing stock.
- iv. Manage applicants' expectations by being realistic about stock availability, to support them in making informed choices about their housing options, and the extent to which they are able to express reasonable preference.
- v. Ensure that the Council's legal duties and corporate responsibilities are met and that they contribute to delivering the Council's priorities.

Equality and Diversity

In producing and operating this policy, we aim to ensure that Council housing is accessible to all sections of the community and provides for a diverse range of housing needs. It should be read in conjunction with the Council's Equality and Diversity Policy, the overall aims of which are to:

- a) eliminate unlawful discrimination;
- b) promote equality of opportunity; and
- c) promote good relations between people of diverse backgrounds

in its employment policies and practices, in its services, and in its engagement with partners and with the communities of the city.

Statement on Fraud

The Council will require applicants to produce specified identification documents (including photographs) and may check the accuracy of information submitted in support of the application. This is to deter and detect fraud and ensure that housing is allocated to those who are entitled to it.

Where investigations identify that a housing fraud has been committed we will take appropriate and proportionate action which may include the following:

- a) application for possession of any property obtained, retained or used fraudulently;
- b) recovery of any monies obtained as a result of the fraud e.g. rent paid by sub-tenants to who the property is unlawfully sub-let;
- c) recovery of any financial loss to the Council including, but not limited to, emergency accommodation costs sustained by the act of denying the Council the ability to use the property to house homeless families;
- d) exclusion or, deferral from, or demotion on the waiting list for accommodation;
- e) report to the Police for criminal investigations and action, or where applicable, conduct relevant investigations as potential prosecuting authority; and
- f) offer advice and assistance to other victims of the fraud, for example a person who has unknowingly paid rent to a tenant who has unlawfully sub-let their council tenancy to them.

To deter those who may be considering committing a housing fraud we will publicise details of any actions we take to counter fraud, details of cases where action has been taken and encourage members of the public to report fraud through all appropriate media and communication channels.

1 Background

1.1 Wolverhampton City Council's housing stock is managed by five managing agents which are:

- a) Wolverhampton Homes, an Arms Length Management Company
- b) Dovecotes Tenants Management Organisation;
- c) Bushbury Hill Estate Management Board;
- d) New Park Village Tenants Management Co-operative; and
- e) Springfield Horseshoe Housing Management Co-operative.

- 1.2 All allocations will be made in accordance with this Policy and must be followed by all managing agents, although some local variations may be allowed. A local variation will only be allowed with the express consent of the Council in writing. Such local variations in policy will be set out in writing and will be made available on request. All Council properties are to be advertised via the Council's Homes in the City choice based lettings scheme.
- 1.3 The way that a Local Authority allocates empty properties is largely governed by various Acts of Parliament and also the outcome of cases that have been before the Courts. Wolverhampton's Tenancy Strategy has also been considered, which commits to the use of introductory tenancies followed by secure tenancies for Council housing across the City. The City Council and its managing agents also take account of Government guidance concerning allocations which are published from time to time.
- 1.4 Allocations are dealt with in the Housing Act 1996 as amended by the Homelessness Act 2002 and the Localism Act 2011.
 - a) Section 167 (1) of the Housing Act 1996 as amended requires every local housing authority to have a scheme for determining priorities, the procedure to be followed and for allocating housing accommodation.
 - b) Section 167 (2) states that the scheme has to include a statement on the authority's policy on offering people who are to be allocated housing accommodation a choice of housing accommodation and the opportunity to express preferences about the housing accommodation that is offered to them.
- 1.5 This policy must be implemented in such a way as to ensure reasonable preference is given to
 - a) people who are homeless (within the meaning of Part 7 of the Housing Act 1996) that is they have no accommodation available for their occupation;
 - b) people who have made applications for homeless assistance and have received a decision that a prescribed duty is owed to them;
 - c) people who are occupying insanitary or overcrowded housing or are otherwise living in unsatisfactory housing conditions;
 - d) people who need to move on medical or social grounds including grounds relating to a disability; and
 - e) people who need to move to a particular locality in the district of the Authority, where failure to meet that need would cause hardship (to themselves or others).
- 1.6 An authority does not have to keep a register of those applying for housing but Wolverhampton has chosen to do so in order to be able to respond to statutory and other requirements relating to factors such as the demand for properties in the City.

This means that everyone applying must have applied for inclusion on the register except those who are ineligible to join or who have been formally excluded. (See 3 below)

2 Data Protection and Freedom of Information

- 2.1 The Council recognises that applicants for housing provide personal and sometimes sensitive information. The Council undertakes to treat this with care and respect, and in particular it will:
- a) hold, retain and dispose of all information in accordance with current legislation
 - b) keep personal information secure and restrict access to it
 - c) enable the applicant to have access to their own information unless it is exempt under the Freedom of Information Act 2000, and to correct any inaccuracies.
- 2.2 The Council's managing agents collate personal data primarily for the purpose of assessing applicants, in line with the Allocations Policy, for their eligibility for housing and the priority they will be awarded. Managing agents including Wolverhampton Homes and the Tenant Management Organisations will share this personal data with the Council for the purposes of reviewing housing decisions, monitoring housing allocations, safeguarding adults and children, preventing and detecting fraud or other criminal offenses.
- 2.3 Further guidance on how the council uses your personal data can be found on our privacy statement which is located on our website.
- 2.4 Each Managing agent will have their own Privacy Statement defining how they use the information provided. Please refer to the managing agents' website (or office) to access this. Here you will also find their data protection contact, which are determined by the individual managing agent, should you have any specific queries or concerns.

3 Access to the housing register

- 3.1 Wolverhampton operates an open register and anyone who applies to Wolverhampton, and is eligible, will be included. It follows from the above that blanket exclusions of particular groups cannot be applied. Each application will be reviewed on a case by case basis.

Exclusions

- 3.2 The Housing Act 1996, as amended by the Homelessness Act 2002, restricts certain people subject to immigration control, or with limited rights of residence or failing the habitual residence test access to the Housing Register, as well as some European nationals depending on their residency and/or employment status and on any specific exclusions. The regulations are updated by Parliament from time to time, and the Council will consider any housing application under the law as it stands when the application or allocation is made. Any applicant excluded from the register will receive written confirmation of the Council's decision.
- 3.3 Applicants may also be excluded from the Housing Register when the Authority is satisfied that the applicant or a member of their household has

been guilty of behaviour serious enough to make him or her unsuitable to be a tenant of the Authority.

- 3.4 For the purpose of this Allocation Policy, unacceptable behaviour includes the behaviour of the applicant, a member of their household and/or their lodgers or visitors. This could include but is not limited to the making of a possession order or the use of anti-social behaviour powers given to the Council by law. Or, where the Council believes any person covered by this section has caused harassment, alarm, distress, nuisance or inconvenience to any other person otherwise engaging in lawful behaviour in the City. The exclusion only applies to the member(s) of the household who were participative in the unacceptable behaviour with other family members being able to make a separate application for housing. Unacceptable behaviour also includes but is not limited to substantial rent arrears cases (not caused by factors outside the applicant's control), persistent non-payers, tenancy fraud or other tenancy breaches. The exclusion will be for a set period of time which will be detailed in the information sent to the applicant informing them of the terms of their exclusion and may include conditions after the exclusion period which an applicant must be able demonstrate have been fulfilled prior to the exclusion ending.
- 3.5 Persons subject to the criteria set out in 3.2, 3.3 & 3.4 cannot be granted a sole tenancy or participate in a joint tenancy. Applicants have the right on request to a review of the decision to exclude them from the housing register on the grounds of serious behaviour.

Lesser preference

- 3.6 There are other circumstances where a person can be included on the housing register but their preference is reduced. See section on Assessment and Bands for details on how this will be applied.

Application process

- 3.7 Applications will normally only be accepted via the on-line application form or by phone. An initial assessment will be undertaken based on the information provided on the application. Prior to any offer of accommodation evidence will need to be provided of all circumstances and residency details on the application at that time.
- 3.8 All applications will be checked to ensure the accuracy of the information provided by an applicant. The application must set out in full all persons who will be residing within any future property allocated under this policy and must provide any proof or documentation requested in order to assist with this purpose. Applicants must also include any former names of any persons included on the application. These checks may also be carried out at the time of allocation to ensure that an applicant's circumstances have not changed. Failure to provide such information or to make bids could lead to an application being closed after 6 months.

- 3.9 Joint applications will be accepted from married or cohabiting couples including same sex relationships providing that each partner is eligible in their own right to access the housing register or applicants not in a relationship who are looking to be considered for a 2 or 3 bedroom flat or maisonette.
- 3.10 Extended household members or others will not normally be included on the application in their own right unless there is parental responsibility or there are medical or social grounds which require that the household needs to live together. Applicants must be able to demonstrate such a need exists and must provide any proof or documentation requested by the Council to assist with this purpose. These checks may also be carried out at the time of allocation to ensure that an applicant's circumstances have not changed.
- 3.11 Help with completing the application form will be made available to anyone who requests it.
- 3.12 As a result of this assessment or an applicant's inaction, applicants may be:
- a) accepted on to the housing register;
 - b) excluded from the housing register;
 - c) deferred until suitability or eligibility has been demonstrated to the Council's satisfaction;
 - d) accepted but given less preference than other applicants; or
 - e) have their applications closed.

4 16/17 year olds

- 4.1 16/17 year olds will not normally qualify for an allocation until reaching the age of 18.
- 4.2 However, if appropriate, the application for re-housing before the age of 18 can be referred to Wolverhampton Young Persons Accommodation Forum (WYPAF).
- 4.3 The criteria for this to happen are:
- must be single with no dependents and
 - in need of support to live independently
- 4.4 Additionally the applicant will be either:
- homeless or threatened with homelessness
 - living in an unsuitable environment with a demonstrable, urgent, need to move
 - resident in a hostel or foyer or other supported accommodation and ready to move on a care leaver owed a duty under the Leaving Care Act 2000
- 4.5 Having assessed the case, WYPAF will then make a recommendation as to appropriate accommodation and / or support. This may, or may not, involve a Council tenancy.

- 4.6 16/17 year olds with dependents will be routed through either the Council's Housing Options Service or the Young Parents Single Referral Panel.
- 4.7 Any 16/17 being granted a council tenancy will be required to have a trustee
- 4.8 For under 16 year olds see 22 below.

5 Reviews

- 5.1 The Housing Act 1996 Part 6 gives applicants the right to request a review of a decision not to award preference on the grounds of:
- a) unacceptable behaviour;
 - b) the facts of their case which have, or may be, taken into account when considering whether or not to allocate a property; or
 - c) that they are not eligible to join the Housing Register.
- 5.2 Applicants will be advised of all decisions in writing along with the reasons for the decision being taken. Applicants will also be advised of their right of review a decision taken if applicable.
- 5.3 Should an applicant wish to exercise their right for a review to be undertaken, they should usually request this review within 21 days of service of the decision. Later requests for a review may be considered if the applicant can demonstrate a genuine and reasonable reason for the delay in requesting the review.
- 5.4 Any request for a review can be made in writing or orally.

Procedure on review

- 5.5 The following procedure will be followed in relation to reviews:-
- All letters concerning a decision made under this policy should provide information about the right to request a review.
 - A review can be undertaken in writing or orally in person and must usually be heard within 56 days of the request for a review.
 - The review will be carried out by someone not involved in the original decision and who is of appropriate seniority.
 - The review will take into account the present circumstances of the applicant not just those applicable at the time of the original decision.
 - The applicant will be given five clear days notice of the date on which the appeals will be considered either orally or in writing.
 - If the review is to be carried out in person, the applicant may be represented.
 - The applicant will be notified, in writing, of the outcome of the review and, if the decision is to uphold the original decision, the reasons why.
- 5.6 If the applicant disputes the outcome of the review then they can take action to request a judicial review. This will not look at the outcome of the review but

at the grounds that the Council has in some way failed to carry out some matter of administration correctly.

6 Prioritisation of applicants

6.1 Applicants circumstances are assessed and placed in one of five bands for allocation purposes. With the Emergency Band having the highest housing priority and band 4 with lesser preference having the lowest priority.

6.2 Where an applicant has two or more needs within a band they will be considered ahead of applicants with fewer needs in that band.

6.3 These bands are:

Emergency Band

Cases where:

- applicants who are homeless and are owed the main duty including when they have become homeless or the Relief Duty has come to an end and they have been assessed as being in priority need and unintentionally homeless;
- there has been a Multi-Agency Panel review and immediate rehousing is required;
- a substantially adapted or purpose-built property is required. This category includes those applicants covered by regulations which apply to members and former members of the Armed Forces and having particular regard for those injured or disabled in action;
- a substantially adapted (2 or more adaptations in the property) or purpose-built property is being freed; or
- an appointed Occupational Therapist has decided the applicant's property is unsuitable for the applicant or a member of their household needs and where adaptations would cost in excess of £5,000 or cannot be carried out due to the construction of the property.

Band 1

Cases where:

- there is an urgent need to move on medical or social grounds;
- there is a young person leaving care;
- Foster Carers and those approved to adopt who require a larger property;
- applicants who are homeless and are owed the Relief Duty and would be owed or likely to be owed the Main duty when the relief duty came to an end, because they are or are likely to be in priority need and homeless;
- the applicant is freeing a placement in a specialist housing scheme, or subject to a single referral forum decision, and has been assessed as ready to move on;
- the household is short of three or more bedrooms in their present accommodation or are experiencing overcrowding that results in a child over the age of 10 having to share a room with a child of the opposite sex;
- a tenant of Wolverhampton City Council or a Registered Provider wishes to leave a house and move to a flat, maisonette or bungalow;
- the applicant's home is subject to a Compulsory Purchase Order/Closing Order;

- the applicant has an urgent need to move to a particular area in the City and where not to do so would cause hardship to themselves or to others.
- Wolverhampton City Council or Registered Provider tenant releasing three or more bedrooms;
- Armed Forces personnel with families upon the provision of a Certificate of Cessation of Entitlement to Occupy Service Living Accommodation; or
- where a Council service tenants occupying tied accommodation whose contract states that accommodation must be occupied and their employment is terminated, the service tenant retires or tied accommodation is no longer available. This will not apply to Employees leaving as a result of dismissal.

Band 2

Cases where:

- the applicant is freeing a placement in a supported housing scheme e.g. hostel / foyer etc. has been assessed as ready to move on;
- applicants who are threatened with homelessness and are owed the Prevention Duty and would be likely to be owed the Main duty if both the Prevention Duty and any Relief Duty that followed on were to end unsuccessfully and they would be, or would likely to be, found to be in priority need and unintentionally homeless;
- the household is short of two bedrooms in their present accommodation;
- a family or pensioner is sharing any of kitchen, bathroom or toilet. (does not apply to owner occupiers or anyone who is a tenant of any kind that has their own kitchen, bathroom and toilet);
- there is a significant need to move on medical or social grounds;
- Wolverhampton City Council or Registered Provider tenant releasing two bedrooms; or
- the applicant is a tenant of WCC or RP who has children under 12 years of age but does not have access to a private garden, this would not apply for a like to like property.

Band 3

Cases where:

- there is a need to move on medical or welfare grounds but which is less than that required for Bands 1 & 2;
- the household is short of one bedroom in their present accommodation;
- Wolverhampton City Council or Registered Provider tenant releasing one bedroom; or
- applicants owed a Prevention duty, or Relief duty for as long as that duty is owed but would not be or are unlikely to be owed the Main Duty when any relief duty came to an end and intentionally homeless.

Band 4

Cases where there is no housing need and cases with lesser housing preference:

- people who live outside of Wolverhampton who do not have an emergency or band 1 identified need to be in the City;

- people who have not lived in the City for at least two years unless there is an emergency or band 1 need to move on medical or social grounds or the applicant or a member of the household is seeking employment in the City and has a firm offer of employment.

The requirements to be resident in the City do not apply to:

- a) those who are currently serving in the regular forces or who were serving in the regular forces at any time in the five years preceding their application for an allocation of social housing;
- b) bereaved spouses or civil partners of those serving in the regular forces where (i) the bereaved spouse or civil partner has recently ceased, or will cease to be entitled, to reside in Ministry of Defence accommodation following the death of their service spouse or civil partner, and (ii) the death was wholly or partly attributable to their service; or
- c) existing or former members of the reserved forces who are suffering from a serious injury, illness or disability which is attributable (wholly or partly) to their service.
- d) eligible homeless applicants that are not subject to a referral to another Local Authority AND they meet the Housing Act local connection criteria.
- e) when an applicant is being supported as they need to move due to domestic violence.

- owner occupiers who have more than £48000 equity in their present property or did so in a property sold in the past two years. Applicants will need to demonstrate that they are proactively marketing their property and regularly update the Council as to the situation regarding the sale;
- anyone who owes debts of more than £60 to a Council or Registered Provider.

This does not apply to:

- a) current Council or Registered Provider tenants who are requesting a transfer to a smaller, more affordable property due to the financial hardships making their rent unaffordable and there is no possession order;
- b) eligible homeless applicants that are not subject to a referral to another Local Authority AND they meet the Housing Act local connection criteria.
- c) when an applicant is being supported as they need to move due to domestic violence.

The allocation of alternative accommodation will be dependent on if (a),(b) and (c) do not apply:

- i. the tenant making regular payments (for a minimum of three months) to show commitment to the repayment plan;
- ii. the tenant will be subject to a full income and expenditure exercise by/on behalf of their managing agent where a repayment plan will be agreed with the tenant; and
- iii. the debt owed at the current property being transferred to the new tenancy and any agreement to discharge the remaining debt will become a condition of the new tenancy;

- tenants of the Council who have been in their property for less than one year;
- tenants of the Council whose property has failed a pre leaving inspection;

- applicants who have been involved in unacceptable behaviour such as persistent non payers, applicant or member of his or her household involved in anti-social behaviour but not serious enough to be excluded from the housing register.
- applicants who do not have a settled address from where their housing needs can be assessed.
- applicants living in hostel or supported housing until assessed as ready to move on.

7 Change of circumstances

- 7.1 Where there is a change in an applicant's circumstances, their relative degree of preference, and therefore their banding priority, will be reviewed. This may result in the applicant moving up or down within the bands. It is the responsibility of the applicant to inform the Council of the changes.
- 7.2 For applicants that do not currently live in Wolverhampton if they have a change in circumstances that cannot be met in the area in which they live e.g. to give or receive essential support, their application will be placed in the appropriate band. This will not apply to needs that can be met where they currently live e.g. overcrowding. It will only be applied where Wolverhampton is the only place where such needs can be met.

8 Band date

- 8.1 This will be the date the applicant registered for re-housing except where there has been a change in a housing need e.g. a medical award when the date of the change will be used. The allocation will normally be made to the application with the earliest date.

9 Medical grounds

- 9.1 The Housing Act 1996 states that reasonable preference on the housing register should be given to applicants who have a need to move on medical or welfare/social grounds.
- 9.2 This category includes an applicant, or member of that applicant's household, whose health is being affected by their current property, and where a move to another more suitable property would alleviate their condition or make it easier to manage.
- 9.3 Where it appears that there is a need to make enquiries into an applicant's medical condition the Council will make use of an independent medical advisor or refer the case to the medical panel.
- 9.4 The applicant should provide their own medical evidence if appropriate which will be sent to the independent advisor or considered by the medical panel to assist with the assessment.
- 9.5 The applicant will be required to complete a medical referral form that may be submitted to the independent advisor. If it is decided that reasonable

preference should be awarded then they will make a recommendation that the applicant is placed in the appropriate band and, where appropriate, a recommendation as to property type. The medical panel can review the decision made by the independent medical advisor.

- 9.6 Where two or more members of a household would qualify for medical priority and the levels of priority are different, the highest will apply.
- 9.7 Medical priority will be reviewed after 6 months or after refusal of a suitable offer of accommodation.
- 9.8 Note: Where a particular circumstance, or set of circumstances, has been taken into account when awarding medical priority, that same circumstance, or set of circumstances, will not be taken into account in any request for social priority or vice versa.

10 Social/welfare grounds

- 10.1 Social/Welfare grounds are factors affecting a person's situation where a move would help in resolving that particular circumstance. Social need awards will be reviewed after 3 months or on refusal of a suitable offer of accommodation.

Circumstances applicable to a Band 1 award

- move to enable a disabled/mentally ill/elderly person & carer to be close in order to prevent immediate admission to hospital or a home where essential support is given. Will only apply where applicant is looking to move to the same estate as carer
- violent injury/death, suicide, rape or attempted rape in or near the home which directly affects the applicant or a member of the applicants household
- where a neighbourhood dispute/racial harassment/hate crime incident results in court action and the applicant needs to move away from an area;
- life threatening violence or the likelihood of it
- children being returned from care but dependent on a change of accommodation
- freeing a hospital bed or residential home placement where present accommodation is deemed unsuitable following professional advice
- change of accommodation required for exceptional social/medical factors where moving would enable the delivery/monitoring of essential support services. Awarded when Housing Support have confirmation that the applicant is engaging with supporting agencies
- City of Wolverhampton Council tenants wanting to move to an age designated block reserved for older households who are currently living in a flat that was a former sheltered scheme and the age designation was removed in April 2016.

Circumstances applicable to a Band 2 award

- burglary: where the applicant is considered vulnerable and is the target of repeat offending
- neighbourhood disputes/racial harassment incidents/hate crime resulting in intimidation or serious threats or damage to property which are recurrent
- to move away from criminal activity and/or drug problems where the applicant would be vulnerable to being drawn back to previous criminality
- Couples/Families/Single people in financial hardship actively looking to downsize from larger accommodation to smaller accommodation and circumstances currently assessed as band 2
- Applicant is a current or former member of the armed forces, injured serviceman or woman, bereaved spouse or civil partner or existing or former member of the reserved forces who is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to their service (families).

Circumstances applicable to a Band 3 award

- accident or bereavement in or near the home which is seriously affecting the applicant or a member of their family.
- neighbourhood disputes/racial harassment resulting in graffiti, gestures, letters.
- where, following the breakdown of a marriage, civil partnership or established common law relationship the former partners are still living in the same property.
- Couples/Families/Single people in financial hardship actively looking to downsize from larger accommodation to smaller accommodation and circumstances currently assessed as band 3
- Applicant is a current or former member of the armed forces, injured serviceman or woman, bereaved spouse or civil partner or existing or former member of the reserved forces who is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to their service (singles).

Note: Where a particular circumstance, or set of circumstances, has been taken into account when awarding social priority, that same circumstance, or set of circumstances, will not be taken into account in any request for medical priority or vice versa.

11 Lettings variations

Local Connection

- 11.1 One in four of all lettings will be to an applicant that has local connection to the area in which the property is located. Applicants need to choose one area in which they claim a local connection.
- 11.2 To satisfy this factor the applicant must be able to demonstrate at least one of the following criteria in addition to any housing need criteria:
- a) Giving or receiving essential support which is evidenced by professional support e.g. hospital, social services etc. Can also be confirmed by the Council's medical advisor.

b) Needs to be close to family/child minder for help with child care etc. which is necessary for the applicant to find/remain in work and travelling from one part of the City to leave children at childcare and then travelling on to work/education has cost, time, disruption implications etc. Difficulties must be able to be evidenced.

c) Long term residency - 5 years out of the previous 10.

d) Working in the area where the job includes early starts/late finishes.

e) Children in school in the area.

f) Cultural reasons e.g. to be near place of worship, community facilities etc.

- 11.3 Properties will be selected randomly to be advertised with preference to applicants with a local connection to the area by an automated process and will be of any property type in any area. In the event of there being no suitable applicants with local connection then the offer will be made to another case in accordance with section 14.1

Lower Bands

- 11.4 To ensure that applicants in Band 2 and Band 3 have an opportunity to receive an offer of accommodation; preference will be given to applicants from these bands for 10% of all lettings made.

- 11.5 Properties will be selected randomly by an automated process and will be of any property type in any area.

- 11.6 In the event of there being no suitable applicants from Bands 2 & 3 then the offer will be made to another case in accordance with section 14.1.

Making best use of Stock

- 11.7 To make best use of the housing stock and to support Wolverhampton Council and RP tenants to move from a house, 50% of all suitable bungalows, flats and maisonettes will be given to those tenants. If the property has adaptations applicants will be considered ahead of house release.

- 11.8 To address under occupancy and overcrowding houses that are released by a Wolverhampton Council tenant moving to a Council or RP bungalow, flat or maisonette or a lodger left in possession of a house the property will be advertised with preference to an applicant who is short of bedrooms in their present council or RP home.

Flats let to Community Directorate

- 11.9 Should the current occupant of one of the 10 flats let to Community Directorate ask to remain in the property instead of moving on at the end of the six months licence they will be allowed to do so.

12 Bidding

- 12.1 Properties that are available or about to become available for letting are normally advertised on a weekly basis from 6pm on Tuesdays until 10a.m. on the following Monday. This is known as the bidding period. Adverts can be seen on our website www.homesinthecity.org.uk; Civic Centre and other Housing Offices in Wolverhampton.
- 12.2 Applicants are invited to express an interest (known as bidding) in up to 3 properties which they are eligible for during the bidding period. This enables the Council and its Managing Agents to advise applicants of all available properties as well as being able to meet the Council's legal duties to those people who have an urgent statutory need to be housed.
- 12.3 Bids can be made via the website, by text, in person at a Housing Office or by phone.

13 Managing the housing register

- 13.1 Applicants with a housing need will be expected to bid on a regular basis. Applicants who are not actively looking for accommodation and have not expressed an interest or bid for a property for 6 months will be deferred.
- 13.2 The applicant will receive a letter explaining the expectations of the applicant and giving contact details should the applicant require any assistance or advice.
- 13.3 The applicant's application is deferred, closed or cancelled at the time the letter is sent until contact made. This means that the applicant is unable to bid for any further homes until contact has been made with the Council.
- 13.4 Applications may also be deferred, closed or cancelled in the following circumstances to ensure that applicant details are kept as up-to-date as possible: -
 - We are informed that they are no longer living at the registered address.
 - We have reason to believe that an applicants needs are not recorded correctly.
 - We have reason to believe that an applicant has made a fraudulent application or provided incorrect information to increase priority.
 - The applicant accepts a home; this could be prior to or following an accompanied viewing.
 - Undeclared debts/tenancy issues are found i.e. if applicant has not indicated on application that debts are outstanding or has not kept to agreed payment arrangement.
- 13.5 Applications may only be re-activated following contact from the applicant and satisfactory investigations have taken place.
- 13.6 Applicants will be required to re-register annually on the anniversary of joining Homes in the City and to advise the Council of any changes in their

circumstances or contact details. Failure to reply to the re-registration letter will result in an applicant being removed from the Housing Register.

- 13.7 Under normal circumstances if an applicant fails to re-register or a request their deferment to be lifted after a 6 month period they will be required to make a new application however, a review of this can be requested.

14 Selection of offers

- 14.1 In the majority of cases properties will be advertised open to all except those selected with lettings variations as highlighted in section 12. When the bidding period comes to an end, contact will be made with the applicant who is in the highest priority band, with the greatest number of housing needs that placed them in that band, who has had that level of housing need the longest and is eligible for that property. The applicant will be contacted to request that they supply evidence of their housing circumstances, their identity and the identity of those moving with them.
- 14.2 If the applicant fails to provide this evidence within a reasonable amount of time the applicant will be bypassed and contact will be made with the next applicant on the shortlist.
- 14.3 Prior to an offer being made the applicant will be subject to an affordability assessment by the managing agent. Where there are affordability concerns the applicant will be referred to a money management service for advice and support on how they will financially sustain a tenancy.
- 14.4 In exceptional circumstances, following a case conference, the Council and its managing agents reserve the right to withhold an offer, or close or cancel an offer. Circumstances where this could occur include but are not limited to:
- where there are concerns that the allocation of the property is a risk on management grounds, such as severe antisocial behaviour or where a perpetrator of domestic violence, hate crime or other offences would be rehoused close to previous victims;
 - where there is evidence from a medical or social work professional that the property bid for would not meet the applicants particular needs;
 - where in order to live independently the applicant will require a package of support that has not been confirmed at the point of the bid being placed; or
 - where the Council believes that information provided at the application or allocation stage is false or misleading.
- 14.5 Where such a situation arises, the applicant will be advised of the offer being withheld/refused and informed why this decision has been made.
- 14.6 Many factors affect which applicant is top of the shortlist for each home (detailed in Section 11 - Lettings Variations). In the event of a property being advertised with multiple preferences shortlist will be run combining all of the preferences. If no applicant matches all of the preferences the property will be allocated as highlighted in 14.1.

- 14.7 Applicants in the emergency band and band 1 to 3 will be considered for an offer prior to applicants in band 4.
- 14.8 Applicants in band 4 with no housing need will be considered for an offer ahead of applicants in band 4 with lesser preference.

15 Difficult to Let Properties

- 15.1 A property will be considered difficult to let if;
- There are no bids received when the property is advertised
 - The property is not let despite bids being made after the shortlist is exhausted due to refusals, withheld offers or withdrawn offers
- 15.2 The property will be advertised as an immediate available property and let on a first-come first-served basis. The applicant needs to be eligible for the property type and evidences provided as outlined in Section 14 Selection of Offers. Should the property be a 3-bedroom house, families eligible for a 2-bedroom house will be considered, subject to an assessment of affordability.

16 Statement of Choice

- 16.1 Applicants owed a homeless duty will have their applications regularly reviewed to ensure they are bidding on suitable properties or to identify any barriers i.e. where they require an adapted property or large property. Being owed a homeless duty relates to those accepted by The City of Wolverhampton Council as statutorily homeless and owed a duty to house under sections 193(2) or 189B of Housing Act 1996; or have been granted homeless status under section 166A(3) (a) (people who are homeless within the meaning of Part VII of the Housing Act 1996).
- 16.2 Where this is the case the Council retains the right to make direct bids on behalf of homeless applicants to help resolve their homelessness into suitable accommodation.
- 16.3 The Council will try to meet preferences around location, which will be assisted by the ability to make offers within the private rented sector and registered provider stock, however due to the availability of stock that meets a household's needs at any given time the Council will retain the right to make an offer of accommodation where this becomes available in any area of Wolverhampton that the Council or one of its managing agents has assessed as suitable and safe for the applicant to live in.
- 16.4 The Council recognises that council accommodation is just one option to resolving a customer's housing need therefore the council may also organise for a direct offer of private rented accommodation or housing association to be made to resolve an applicant's housing need. This is undertaken in line with the City Council's Homeless Strategy.

- 16.5 The Council will have due regard to where an applicant cannot live in certain areas due to fear of violence, harassment, domestic abuse or similar circumstance.
- 16.6 Applicants (excluding those owed a homeless duty, please see below) who have refused two offers of suitable accommodation in a 12-month period will be deferred from the housing register for a period of six months. Applicants will be advised of this in writing and can request a review of this decision. An applicant's housing application can be reviewed following a refusal of a property.
- 16.7 Applicants owed a homeless duty will be made one offer of suitable accommodation. If refused this will end the statutory homelessness duty, meaning the removal of a statutory reasonable preference need award. This applies to those households accepted as statutorily homeless and owed a duty to house. Unless the applicant has another reason to be awarded a priority they will be placed in Band 4. Applicants will have a right to request a review of this decision.

17 Feedback

- 17.1 Applicants will be able to see the outcome of each letting including the number of people to express an interest, the band priority and the date of application of the successful applicant. This information is available on the Homes in the City website and Housing Offices.

18 Support in the allocations process

- 18.1 It is recognised that some applicants may require help with applying for properties. Information on available properties is accessible in a number of ways to ensure that applicants with disabilities, such as sight or hearing impairments, can make as informed a choice as able-bodied applicants. Support workers are also trained in the process of bidding to ensure that they can offer positive assistance to applicants requiring assistance.
- 18.2 Some particularly vulnerable applicants may require additional help to ensure that they have the same opportunity to access accommodation. The Supported Application List is a further enhancement which seeks to provide a number of personalised services for vulnerable applicants, such as:
- contact with applicants to advise of available properties;
 - referral to the appropriate local agency or support worker to enable proactive support with applying, or applying on the applicant's behalf; or
 - regular contact from staff to ensure needs are being met in terms of support.
- 18.3 Referrals for admitting to the Supported List may come from a number of sources, although most would come via the following (not exclusive):

- from the application form – where a badly completed form may indicate literacy or language problems or where the applicant may indicate a particular disability such as a hearing or sight impairment;
- request from a support worker – where a support worker specifically requests additional assistance for one of their clients; or
- from a non-bidders' report – where it is identified the applicant is not making bids for suitable accommodation.

18.4 The extent of additional assistance will be tailored to meet the needs of the individual applicant.

18.5 List of potentially vulnerable client groups:

Homeless / Rough sleepers Ex-offenders / those at risk of offending or imprisonment
 Physical or sensory disability Risk of domestic violence
 Alcohol / drug problems Teenage parents
 Elderly people Young people at risk
 Living with HIV / AIDS Learning disabilities
 Travellers Homeless families with support needs
 Refugees / Asylum seekers

19 Introductory tenancies

19.1 Wolverhampton City Council operates introductory tenancies.

19.2 All new tenants of the Council will be introductory tenants for the first twelve months of their tenancy. This will not apply to current Council tenants transferring or to new tenants who were previously secure tenants of another authority or an assured tenant of a Registered Providers.

19.3 A tenancy will remain introductory however if proceedings for possession have been started but not yet resolved

19.4 The rights of introductory tenants differ from those of secure tenants. Introductory tenants cannot:

- a) take in lodgers;
- b) exercise the right to buy (although the period spent as an introductory tenant will count towards the qualifying period);
- c) sub-let;
- d) carry out a mutual exchange; or
- e) vote on matters concerning changes in policy or practice concerning housing management.

19.5 However there may be times when the Council would wish to allow something that is not given as a right e.g. allow a mutual exchange.

19.6 Where action is taken to end a tenancy the Council does not have to prove the facts in court only that it has followed the correct procedure particularly with regard to considering any appeal against the decision to go to court.

19.7 Extended Introductory tenancies can be extended up to 18 months.

20 Registered provider nominations

20.1 Registered Providers (RPs) used to be known as Registered Social Landlords (RSLs) and prior to that as Housing Associations. They are non-profit making organisations providing homes for people in housing need.

20.2 Wolverhampton City Council has an agreement with the RPs that have properties in the city that a negotiated percentage of their lettings will be to people nominated to them from the Council's Housing Register. A copy of the nomination agreement is available upon request.

20.3 All properties put forward from the RPs for a nomination will be advertised in the same way as council properties so that applicants are offered the widest choice of accommodation available. The advert will distinguish that it is an RP property and display the name the relevant RP.

20.4 The nomination will be made within the Allocation Policy and the household make/family size up as set out by the RP.

20.5 Nominations will only be made where an applicant would be eligible to receive an offer of accommodation as set out in section 3.

20.6 Once an applicant is nominated they will not be considered for other offers until such time as the RP has advised the Council of the outcome of the nomination.

21 Relationship breakdown

21.1 Relationships for the purpose of this policy are defined as marriages, civil partnerships and established common law partnerships i.e. 12 months +.

21.2 In general it would be the intention that the partner that has responsibility for any child/ren of the relationship should remain in the home. In this event the allocation of that property will be excluded from the general allocation policy. The other partner will be able to bid on other properties subject to the banding under clause 6.3.

21.3 If the breakdown is as a result of domestic abuse it may be more appropriate to rehouse the parent and child/ren away from the matrimonial home.

21.4 If 21.2 above applies and the former partner is left in occupation as a tenant, then action under ground 2A Schedule One of the Housing Act 1996 as amended may be taken to end the tenancy. In these circumstances no offer of alternative accommodation will be made.

21.5 In all cases the applicants will be expected to sign, in the presence of a housing officer, a declaration stating the reasons for the relationship

breakdown and, where there are children involved, the arrangements for their future care.

- 21.6 If one partner has left the home and there are no contact details available for them, then the remaining partner will be required to declare that fact in the declaration in 21.5 above.

22 Referrals for minors

- 22.1 Where Wolverhampton's Children and Young Peoples Services feel that rehousing is required in helping them carry out their functions to a child in need; a full report should be prepared by them in line with statutory requirements.
- 22.2 The report should detail why, without rehousing, the child is unlikely to achieve or maintain a reasonable standard of health or development.
- 22.3 The report will then be considered by the Council and, if appropriate, the case will be placed in the relevant band.

23 Access to children

- 23.1 Where an applicant has a joint residence order in respect of children with a former partner, the eligibilities set out section 33 may be varied to take account of that order.
- 23.2 Other demands on the housing stock will be considered along with any potential under-occupancy of the property. Children will only be included as part of the household if the child is both dependent upon and resident with the applicant. A child shall be deemed to be resident with the applicant if it is their principal place of residence. Proof may be required to ensure that evidence provided in this respect is correct to the Council's satisfaction.

24 Sundry factors affecting allocations

- 24.1 Worsening situation

Where an applicant deliberately worsens their living conditions in order to gain benefit under this Allocations Policy no increase in their priority will be given until they have been in the new circumstances for one year.

- 24.2 Declaration of interest

Applicants that work for Wolverhampton Homes, Dovecotes Tenants Management Organisation, Bushbury Hill EMB, New Park Village TMC and Springfield Horseshoe HMC must make this fact known in any application for rehousing. Any offer of accommodation to a member of staff of their organisations must be referred to the Director of Housing at Wolverhampton Homes for approval.

24.3 Major repair, fire, flood or Key Worker

- a) Occasionally allocations will be made under Schedule 1 s79 Housing Act 1985 for example to Council tenants whose own property is undergoing major works or has been the subject of a disaster such as fire, flood etc., or to an employee of the Council who is required to occupy a particular property for the better performance of their duties (Service Tenants) or is someone that has been declared by Wolverhampton City Council's Corporate Human Resources Team to be a new member of staff requiring temporary accommodation before completing a full move to the area.
- b) As these are not secure tenancies, this type of letting is not covered by this Allocations Policy.
- c) Tenants being out of their home where the works have resulted in the decant period of more than 6 months and the household meets the eligibility criteria for the property the tenant can be offered the choice to stay or return to their original property.

24.4 Local Lettings Plans

- a) From time to time it may be identified by a managing agent that a particular area, block etc. would benefit from a local lettings plan where the needs are not met by way of the main allocations policy.
- b) This could relate to particular age groups, the number of children in locality, need to manage criminality, essential workers to be near work where high housing costs would otherwise prevent them from being in the community they serve, the economically active etc.
- c) The managing agent would need to demonstrate to the Council the need for such a policy giving:
 - the objective of the policy;
 - the numbers/types of properties affected;
 - the evidence used to support the proposal including existing tenant base, potential tenants and turnover by property type;
 - an assessment of the impact on potential tenants who would possibly be disadvantaged by the implementation of such a policy;
 - evidence of consultation with any other affected persons or organisations such as Tenants Groups, RPs, Voluntary Sector Groups or other existing forums such as Area Panels;
 - how it is proposed to market the policy so that existing and potential stakeholders are aware of it; and
 - how the policy will be monitored particularly with regard to equal opportunities and its success in achieving its objectives.
- d) The use of Local Lettings Plans must be balanced against the Council's legal duty to allocate accommodation to people in housing need and must not dominate the Council's lettings policy.
- e) Local Lettings Plans will be subject to review in a timescale agreed between the managing agent and the Council.

f) All requests to implement a Local Lettings Plan must receive Council approval by way of an Individual Executive Decision Notice.

g) Copies of any Local Lettings plans are available on request.

25 Joint tenancies

Granting of Joint Tenancy

25.1 Joint tenancies will normally be granted to married couples (including Civil Partnerships) or couples living together as common law partners and where it can be shown that they have done so for 12 months or more.

25.2 Joint tenancies can be granted to applicants not in a relationship for 2 or 3 bedroom flats or maisonettes.

25.3 In each case the joint tenancy will only be granted if the other person would be eligible in their own right to receive an allocation.

25.4 If a tenant has succeeded to a tenancy a joint tenant cannot be added.

25.5 Where someone joins a tenancy they will be asked to sign to accept the terms of the current tenancy agreement and will receive a specimen copy of that agreement.

26 Direct Allocations

26.1 The Council reserves the right to directly allocate properties which have been purchased in cases of for example estate regeneration, where this has been subject to separate Cabinet approval.

26.2 Large-scale City Emergency

In the event of a large-scale City emergency CWC reserves the right to allocate any available properties outside of the Allocations Policy.

27 Discretionary lettings

The below lettings can be made at the sole discretion of the Council. They fall outside of the main policy above, however are an integral part of the Council's Allocation Policy.

Ending a joint tenancy

27.1 When one party gives notice on a joint tenancy this has the effect of bringing the whole tenancy to an end.

- 27.2 The Council will, having regard to all the circumstances of the case and if so requested, decide whether to grant a sole tenancy to the former joint tenant who remains in the property.
- 27.3 Factors to be considered would include responsibility for children, caring for a relative, the size of the property having regard to the household size of the applicant requesting the property, the demand for that particular property at the time etc.
- 27.4 The Family Court can decide that a joint tenancy be transferred to a sole tenancy in the name of one of partners then this transfer is not subject to this Allocations Policy.

28 Death of a tenant where there is no legal right of succession

- 28.1 Where there is no legal successor but someone is left in the property, consideration will be given to allow that person to be given the tenancy if:
- a) that person has lived with the previous tenant for more than 10 years or
 - b) will be taking on the responsibility for the previous tenant's dependants, and in both cases
 - c) the household is eligible for the property type, (for households eligible for a house under occupation by 1 bedroom is permitted) or
 - d) the applicant would be entitled to re-housing under the Homelessness Act and the applicant has lived in the City for at least 2 years.
- 28.2 Where the conditions of 28.1 are not met the person/s left in the property will be treated as possession use and occupation account.
- 28.3 Lodgers in possession will be placed in the band according to the property type they are residing in i.e. if releasing a house band 1 and the application will be registered to the date of the start of last tenancy.
- 28.4 28.2 and 28.3 above will only apply if the lodger in possession is eligible to receive an allocation under the terms of this Allocation Policy.
- 28.5 The Family Court can decide that the tenancy be given to the person/s left in the property in which case the transfer is not subject to this allocations policy.

29 Assignments

- 29.1 A tenancy can only be assigned in three ways
- a) to someone who would qualify as a successor;
 - b) by way of mutual exchange under s91 Housing Act 1985; or
 - c) following an order of the court under a number of provisions concerning family law.

30 Assignment to a potential successor

- 30.1 In 29.1 a) above the proposed assignee would have to satisfy the criteria in s87 Housing Act 1985.
- 30.2 Assignments to potential successors must be by deed but this necessity may be avoided if the assignment is evidenced in writing.
- 30.3 The provisions under 29.1 a) above do not apply when the tenancy has been assigned.
- 30.4 Assignments by way of exchange are allowed under s92 Housing Act 1985.

31 Mutual exchanges

- 31.1 A secure tenant may assign the tenancy to another secure tenant. Both tenants need the written permission of their landlord. This permission will not be unreasonably withheld except on or more specific grounds.
- 31.2 The Council will reply to a request to assign by way of mutual exchange within 42 days of receiving the request and will inform the tenant of the outcome and, if permission is not given, the reason for refusal.
- 31.3 The Council may refuse consent on the following grounds which are set out in Schedule 3 of the Housing Act 1985. These apply to any party to the exchange.

a) the tenant is, or will be on a specified date, obliged to give up possession following a court order; or
b) proceedings have begun for possession of the property under one or more of grounds in Part 1 Schedule 2 Housing Act 1985 which are:

- i. rent has not been paid or a tenancy condition has been broken.
- ii. nuisance or annoyance has been caused or the property has been used for immoral or illegal purposes.
- iii. due to the neglect of the tenant the condition of the property and /or the furniture has been allowed to deteriorate.
- iv. the tenant obtained the tenancy by knowingly and recklessly making a false statement.
- v. the tenant or previous tenant who was a member of their family obtained the tenancy by way of mutual exchange and a premium was paid.
- vi. the outgoing tenant's property is substantially larger than the incoming tenant needs, this is regarded as two or more bedrooms unoccupied;
- vii. the outgoing tenant's property is not reasonably suitable to the needs of the incoming tenant i.e. the exchange would result in overcrowding;
- viii. the property is used mainly for purposes other than housing and was let to the tenant by Wolverhampton City Council in connection with their employment;
- ix. the property was either purpose built for, or has been adapted to make it suitable for, occupation by a physically disabled person and, if

the exchange were allowed, there would be no such person living there; or

x. the property is one of a group of properties which are let to people with special needs and a social service or special facility is provided nearby i.e. sheltered schemes.

31.4 As stated in 31.1 above while permission will not be unreasonably withheld by the Council it may impose conditions on the consent for example, clearing rent arrears, making good damage or rectifying any other breach of the tenancy agreement not covered in 31.3b above.

31.5 Permission will not be unreasonably withheld for a Council or RP tenant who has accrued rent arrears if their proposed move is due to the financial hardships of Welfare Reform making their rent unaffordable. Tenants must:

- a. be exchanging their property for smaller, more affordable accommodation.
- b. have reduce the debt over a 3 month period and have a signed repayment plan.

Council tenants must meet certain criteria:

- i. the debt owed at the current property will be transferred to the new tenancy and any agreement to discharge the remaining debt will become a condition of the new tenancy;
- ii. will be subject to a full income and expenditure exercise by/on behalf of their managing agent where a repayment plan will be agreed with the tenant

31.6 Whilst a request to exchange with a tenant of a property designated for a certain age group cannot lawfully be refused, the ingoing tenant will made aware of the designation and the expectations of other tenants. (see section 32)

31.7 Once the necessary permissions have been given the exchange will take place on the following Monday.

31.8 If a tenant feels that permission has been refused unreasonably or that a condition has been imposed unreasonably they can ask for a review of the decision. (See Reviews)

32 Designated properties

32.1 Particular blocks of flats are designated for older households as set out within the 'Designated Properties Local Lettings Plan', which is an addendum to the Allocations Policy. The local lettings plan contains the detail on the properties that are age designated, eligibility and the process for selection of offers on these properties.

32.2 Periodic reviews of designations may be undertaken. This can result in changes being made to the local lettings plan to ensure that age designations

are fit for purpose and meet their original aim as well as allowing the Council to react to changes in supply and demand.

32.3 For further detail please refer to the 'Designated Properties Local Lettings Plan'.

33 Property eligibilities

33.1 The following table provides a breakdown of what household types are eligible for the different property types:

Property Type	Household Criteria
Studio Flat, General Needs	<ul style="list-style-type: none"> • Single person • Couple
1 Bedroom Bungalow, General Needs	<ul style="list-style-type: none"> • Single person over 60 • Couple over 60 • Single person or couple assessed as requiring a bungalow due to disabilities
1 Bedroom Flat, General Needs	<ul style="list-style-type: none"> • Single person • Couple
2 Bedroom Bungalow, General Needs	<ul style="list-style-type: none"> • 2 adults over 60 that require a bedroom each • Couple over 60 • Couple over 60 moving with one adult • Single person over 60 • Single person over 60 moving with 1 adult • Single person, couple or family assessed as requiring a bungalow due to disabilities
2 Bedroom Flat, General Needs	<ul style="list-style-type: none"> • 2 adults that require a bedroom each • Couple • Couple moving with one adult • Family that requires a minimum of 2 bedrooms • Single person • Single person moving with 1 adult
2 Bedroom House, General Needs	<ul style="list-style-type: none"> • Family that requires a minimum of 2 bedrooms
2 Bedroom Maisonette, General Needs	<ul style="list-style-type: none"> • 2 adults that require a bedroom each • Couple • Couple moving with one adult • Family that requires a minimum of 2 bedrooms • Single person • Single person moving with 1 adult
2 Bedroom Parlour House, General Needs	<ul style="list-style-type: none"> • Family that requires a minimum of 2 bedrooms
3 Bedroom Bungalow, General Needs	<ul style="list-style-type: none"> • Couple over 60 moving with 2 adults • Single person over 60 moving with 2 adults • Single person, couple or family assessed as requiring a 3-bedroom bungalow due to disabilities

3 Bedroom Flat, General Needs	<ul style="list-style-type: none"> • Couple moving with 2 adults • Family that requires a minimum of 2 bedrooms • Family that requires a minimum of 3 bedrooms • Family with an adult requiring a minimum of 3 bedrooms • Single person moving with 2 adults
3 Bedroom House, General Needs	<ul style="list-style-type: none"> • Family that requires a minimum of 3 bedrooms • Family with an adult requiring a minimum of 3 bedrooms
3 Bedroom Maisonette General Needs	<ul style="list-style-type: none"> • Couple moving with 2 adults • Family that requires a minimum of 2 bedrooms • Family that requires a minimum of 3 bedrooms • Family with an adult requiring a minimum of 3 bedrooms • Single person moving with 2 adults
3 Bedroom Parlour House, General Needs	<ul style="list-style-type: none"> • Family that requires a minimum of 3 bedrooms • Family that requires a minimum of 4 bedrooms • Family with an adult/adults requiring a minimum of 3 bedrooms • Family with an adult/adult requiring a minimum of 4 bedrooms
4 Bedroom House, General Needs	<ul style="list-style-type: none"> • Family that requires a minimum of 4 bedrooms • Family with an adult/adult requiring a minimum of 4 bedrooms
4 Bedroom Parlour House, General Needs	<ul style="list-style-type: none"> • Family that requires a minimum of 4 bedrooms • Family with an adult/adult requiring a minimum of 4 bedrooms • Family that requires 5 or more bedrooms • Family with an adult/adult requiring a minimum of 5+ bedrooms
5 Bedroom House, General Needs	<ul style="list-style-type: none"> • Family that requires 5 or more bedrooms • Family with an adult/adult requiring a minimum of 5+ bedrooms
6 Bedroom House, General Needs	<ul style="list-style-type: none"> • Family that requires 5 or more bedrooms • Family with an adult/adult requiring a minimum of 5+ bedrooms