# AGENDA

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| 2. | GOVERNANCE |   |   |
| 2.1 | COMPANY SECRETARY’S REPORT Report of the Company Secretary | Attached | 5.35 |
|   | - Group Data Protection Policy 2016-2019 |   |   |
|   | - Group Code of Conduct |   |   |
|   | - Chair Appointment Process |   |   |
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|   | - Group Modern Slavery Policy |   |   |
|   | - Use of Company Seal |   |   |

<p>| 3. | STRATEGY AND LEADERSHIP |   |   |
| 3.1 | GROUP TENANT &amp; LEASEHOLDER INVoLvEMENT STRATEGY 2016-2019 Report of the Interim Assistant Director Tenancy and Estate Management | Attached | 5.45 |</p>
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4. CLOSING ITEMS

4.1 ANY OTHER BUSINESS

4.2 DATE OF NEXT MEETING
Thursday 28 April 2016

5. CONFIDENTIAL

Members wishing to raise matters under Any Other Business should note that items will only be accepted if referred to and agreed by the Chair of the Board prior to commencement of the Meeting. Members wishing to submit their apologies should do so by contacting the Company Secretariat on 0115 746 9485. This agenda was issued by email on 24 March 2016.
1. WELCOME, INTRODUCTIONS & CHAIR'S ANNOUNCEMENTS

1.1 The Company Secretary introduced Alison Bingham from the Bulwell Academy, who gave a presentation on Partnership Working between Bulwell Academy and Nottingham City Homes (NCH).

1.1.1 Alison stated that employability and understanding the world of work is very relevant to their students. 75% of Year 7’s at Bulwell Academy are entitled to Free School Meals. Key members of NCH staff come into the Academy and support students. Last year one student joined NCH as an apprentice. 14 NCH staff also volunteered to provide interview experience for students. Half of Bulwell Academy students go on to attend universities and half go on to employment or further education.
1.1.2 The partnership is a very powerful one and the support that NCH is giving is invaluable. Alison concluded the presentation by showing the Clicksilver video by the National Videogame Arcade. This video is available on Youtube and the link has been emailed to Board Members. The Chair thanked Alison for the presentation.

1.2 The Chair provided feedback on the two Tenants events held on 11 and 12 February 2016. All of the tenants suggestions were collated and taken into account and the tenants requested that a march be held in Nottingham against the Housing Bill. There will therefore be marches in both London and Nottingham on 13 March 2016. The Chair is also writing to the House of Lords on tenants’ behalf. The Chief Executive of TPAS met with Baroness Lister yesterday, and will also meet with Lord Best tomorrow, to express concerns over the Housing Bill and has used our letter as evidence in these meetings.

1.2.1 The Chief Executive stated that tenants were angry and upset about the future of council housing and the letter to the House of Lords is compiled of quotes from tenants. It is hoped that this would be of help to the House of Lords in their debate. There will be a march on the 13 March which will commence at 11 am on Low Pavement outside Jamie Oliver’s restaurant, ending up at Speakers Corner. The Council House will be booked in case the weather is inclement. A Market is also on in the Market Square that day, so space may be limited. Tea and coffee will be available at the Council House after the speeches, along with staff and agencies who will be able to provide advice and support. Stewards and marshals are still required.

1.2.2 The Chair has also given interviews on Radio Nottingham and Notts TV regarding the Housing Bill.

2. **APOLOGIES FOR ABSENCE**

Apologies were received from Bill Blincoe, Glenn Harris MBE, Trish Nixon and Gill Moy.

3. **DECLARATIONS OF INTEREST**

None declared.

4. **CONFIRMATION OF MINUTES OF THE MEETING HELD ON 28 JANUARY 2016**

These were agreed as a true record. The Chair signed the minutes.

5. **COMPANY SECRETARY’S REPORT**

5.1 **REGISTERED PROVIDER BUSINESS PLAN**

5.1.1 The Company Secretary introduced the report. He confirmed that the business plan for the subsidiaries sets out the objectives of the new business and how it will deliver on these, along with the financial forecasts. It is a requirement of the Homes and Communities Agency (HCA) Registered Provider application process.
that the business plan is submitted as part of the Detailed Application.

5.1.2 The Company Secretary stated that there had already been a large number of documents and reports issued to Board Members as part of the Registered Provider application process, but there are now only approximately 5 remaining documents to be issued for the next meeting Board Meeting and then the application papers would be complete.

RESOLUTION:

The Board agreed:
1. The Registered Provider Business Plan.

5.2 INTRA GROUP AGREEMENT (IGA) – SERVICES AGREEMENT

5.2.1 The Company Secretary outlined the proposals in the paper, in particular how the Intra Group Agreement sets out agreed terms and objectives, governance arrangements and a number of covenants as well as parent intervention powers and processes for dispute resolution.

5.2.2 In addition, the Intra Group Agreement contains a Service Level Agreement between NCH as parent and NCH Registered Provider as a subsidiary. Board have seen and commented on the Service Level Agreement at their meeting in November 2015. It was also discussed in detail at the Anthony Collins LLP sessions.

RESOLUTIONS:

The Board agreed:
1. The Intra Group Agreement Services Agreement.

5.3 USE OF SEAL

5.3.1 The Company Secretary explained that the Seal was affixed on the 28 January 2016 for the purchase of 63 Cranwell Road, Nottingham, NG8 6NQ for £85,000.

RESOLUTION:

The Board agreed:
1. To note the use of the Company Seal.

5.4 HR SUB COMMITTEE

5.4.1 The Company Secretary stated that at its last meeting, Board agreed to reconstitute the HR Sub Committee. Nominations were sought and there were 5 submitted: Janet Storar, Dave Bennet-Bull, Victor Haven, Anne Dean and Bill Blincoe.

RESOLUTION:

The Board agreed:
1. The membership of the HR Sub Committee to be Janet Storar, Dave Bennet-Bull, Victor Haven, Anne Dean and Bill Blincoe.

6. RISK MANAGEMENT UPDATE

6.1 The Head of Risk Management introduced the report stating that Board has previously discussed and agreed a number of improvements to the way we manage risk at NCH. Improvements included the way that risk registers are structured and relate back to our corporate objectives, and the way they are reported to and reviewed by Board and Audit Committee. Our Risk Management Framework has been amended to reflect these decisions.

6.2 The Risk Management Framework has been updated to reflect that it is a Group framework, and to also incorporate comments that Board made previously.

6.3 The Corporate Risk Register has also been updated to incorporate the agreed risk owners for sub risks. Training has been arranged for these risk owners and they are starting to populate the risk register. The Head of Risk Management confirmed that we are on target for the Homes and Communities Agency (HCA) application. There will also be Board Member training, and there is an agreement that this will be provided by Zurich. This training could be delivered through an Awayday for Board Members, to take place towards the end of March.

6.4 Board enquired whether all Board Members can access the Covalent system. The Company Secretary will check to make sure that Board Members have access to Covalent, and that Board Members have relevant training in order to use the system.

6.5 The Head of Risk Management issued an updated copy of the Corporate Risk Register. Board Members comments regarding the Corporate Risk Register will be incorporated into the Awayday training. Board were asked to submit suggestions on what they would like to cover in the second half of the Awayday.

6.6 Board Member queried the National Housing Federation (NHF) Code with regard to mergers, and whether the HCA would enforce the code or merely accept it as guidance. The Chief Executive stated that this question had already been forwarded to the Project Manager who is dealing with the Registered Provider application.

RESOLUTION:

The Board agreed:
1. To approve the revised Risk Management Framework.
2. To note progress towards implementation of the new Corporate Risk Register.
3. The Company Secretary to review Board access to Covalent.

7. QUARTER 3 PERFORMANCE SUMMARY 2015/2016
7.1 The Director of Business Services (DBS) presented the performance summary. The performance report was previously circulating to Board Members on 2 February 2016, which details the range of actions being taken to maintain and/or improve current performance levels.

7.2 The DBS met with the Customer Excellence Panel (CEP) at their last meeting to take them through the report. As agreed by Board, from now on CEP will be looking at the overall performance of NCH by using these reports and by talking to tenants. From the next financial year, representatives from CEP will attend Board each quarter to report back on these quarterly reports.

7.3 The DBS stated that there were record highs this quarter, such as completed repairs and tenant satisfaction on value for money for rent. There are some areas that need improvement, such as staff sickness levels being 11.83 days when the target is 11 days. However, it is moving in the right direction.

7.4 Board Members asked what was being done to bring the Anti Social Behaviour (ASB) figure of 68.97% in line with the target of 85%. The result last month was based on a low return survey. The previous months result was 79-80%. It was only at the last Board meeting that the ASB strategy was agreed, so new initiatives will not be reflected in these figures.

7.5 Board Member queried the response regarding the ASB figures. Also the number of lettable voids was queried. The full report that was issued to Board Members on 2 February 2016 had the full picture regarding voids. The Chief Executive explained that we are seeing more voids coming through, for example, as a consequence of letting new build properties and moving existing tenants into them. 318 terminations per quarter is now up to 400 terminations.

7.6 The full Quarterly Performance Report will still be issued to Board Members as soon as it is available, asking for comments. In order to provide Board with a clearer picture and to enable them to have a strategic input, the Quarterly Performance full report will also be resent at the same time as the Board papers.

**RESOLUTION:**

The Board agreed:
1. To note the contents of the report.
2. To discuss the main findings and implications for Nottingham City Homes.

8. **2015/2016 QUARTER 3 FINANCE REPORT**

8.1 The Director of Business Services presented an update on the Company’s current financial position at the end of Quarter 3.

8.2 The Company’s management accounts shows an underspend against budget at the end of Quarter 3 of £0.785million. The full year position net of planned allocations to reserves and the refund to the City Council is forecast to be a surplus of £0.196million. This shows a slight reduction in comparison to the
original budget of £0.219 million but includes an additional contribution to the Accommodation Strategy to refurbish the Harvey Road site, reserve of £0.5 million, as approved by Board in January, which was not in the original budget. There has been savings made on employee costs, and all service areas are contributing savings.

RESOLUTION:

The Board agreed:
1. To note the 2015/2016 financial position.

9. 2016/2017 BUDGET REPORT

9.1 The DBS reported that at last Board meeting, NCH was asked to look at modelling a 1% rent reduction. In addition, he brought to the Boards attention a number of significant budget pressures facing the Group next year, including NCH having a smaller management fee and an anticipated 1% employee pay increase, with associated National Insurance increase and pension changes.

9.2 As a consequence, NCH needs to make savings of £2.5 million and all service areas have identified savings of 5% and 10% in support of this. £2.5 million represents a 5% savings target. Overall, the budget proposed in this report balances savings with the forecast income for the year.

9.3 Board Members queried whether employee pension contributions are sustainable. Full financial accounts show a deficit due to a pension liability however, NCH has a letter of guarantee that NCC will meet those liabilities on NCH’s behalf. Staff contributions are fixed nationally.

9.4 The Chief Executive stated that to ensure that NCH achieves these targets, each team will be given their budget for the next financial year based on their agreed reductions. Teams will then have to work within their reduced budget. The DBS explained that guidelines have been issued to team managers, asking them to look to minimise the impact of these by being smarter on how we provide the same level of service in a reduced budget. Each Team Manager is expected to work within their budget and report to their Director their progress. Support is also available for Team Managers from the Finance Team.

RESOLUTION:

The Board agreed:
1. The 2016/2017 budget.
2. A 1% reduction in the rents charged to existing tenants in NCH social housing properties in 2016/2017 – with a 5% increase applied when they become vacant and on new properties let.

10. FEEDBACK FROM NATIONAL HOUSING FEDERATION BOARD MEMBERS CONFERENCE

10.1 Board Members, Victor Haven and Sartia-Marie Rehman-Wall attended the
National Housing Federation Board Members Conference in London on the 5 and 6 February 2016. The conference covered the area that Board Members are leaders and have a role in inventing the future. Board Members need to have the time to look ahead and create improvements. Board Members need to be able to future proof in order to provide resilience and to achieve this they need to have good governance. The presentation given during the conference will be emailed to VH and VH will produce a summary of those presentations for the next Board meeting. Both VM and SMRW thought the conference was enjoyable, informative and very worthwhile.

11. ANY OTHER BUSINESS

11.1 Policy updates will be included as a standing item presented to Board on a quarterly basis.

12. DATE OF THE NEXT MEETING

The Board agreed that date of the next scheduled meeting was on the 31 March 2016 at a venue to be determined.

The meeting closed at 18.52

SIGNED……………………………………………………………….. DATE ……………………..
ITEM: 2.1

N OTT INGHAM C ITY HOMES

REPORT OF THE COMPANY SECRETARY

THE BOARD

31 MARCH 2016

COMPANY SECRETARY’S REPORT

1 SUMMARY

1.1 This report sets out the administrative and governance matters requiring consideration and approval by the Board since the last meeting.

2 RECOMMENDATIONS

It is recommended that the Board:

2.1 Agree the Group Date Protection Policy 2016-2019.

2.2 Agree the Group Code of Conduct and delegates final sign off to the Chair once consultation with trade unions is concluded.

2.3 Agree the process and timetable for Chair appointment and the move to a selection process for Tenant Board Members.

2.4 Note the outcome of the Social Housing Equality Framework assessment.

2.5 Agree the Group Modern Day Slavery Policy.

2.6 Note the use of the Company Seal.

3 REPORT

3.1 GROUP DATA PROTECTION POLICY 2016-2019

3.1.1 Data Protection is a statutory duty. In order to avoid or reduce the risk of non-compliance by the Group, a policy is required to give guidance and state the Group’s position on Data Protection.

3.1.2 A review of our Data Protection arrangements has been carried out, and whilst the statutory requirements have not changed, the Policy has been revised and refreshed to provide clarity to tenants, leaseholders, partner organisations, staff and Members. The revised Group Data Protection Policy is attached as Appendix 1.

3.1.3 The consequences of a breach that is brought to the attention of the Information Commissioner’s Office (ICO), which is the body responsible for enforcing the Data Protection Act, can lead to prosecution resulting in a fine, criminal conviction, and/or bad publicity resulting in reputational damage.

3.1.4 In 2014 the ICO produced a report outlining areas where providers of social
housing, including Arm’s Length Management Organisations, could improve compliance with the Data Protection Act. Key findings were issues around data sharing, encryption and retention schedules.

3.1.5 In reviewing our arrangements, particularly with reference to the concerns in the ICO’s report we found;

We have relevant and robust Data Sharing Protocols and agreements with necessary organisations such as Police and relevant third party organisations we work with.

Information is securely stored on site. Any personal information going off site is encrypted. We also have GCSX (for secure email) and Cryptshare (secure Corporate drop box).

We have retention schedules for relevant data. This is currently being reviewed as Nottingham City Homes (NCH) support and work with the City Council to develop an Information Asset Register.

In addition;

Our website clearly sets out our approach to Data Protection and Freedom of Information. We provide a dedicated “Information Governance” email address for data and Freedom Of Information requests, monitored by the Information Governance Team, who log and process all requests in accordance with statutory requirements.

NCH provides a range of options for service users to contact us. We can be contacted by email, telephone, text, and letter or in person. NCH provides hearing loops for personal callers and access to ‘Languageline’ translation services, if required.

Staff are only permitted access to personal information required to fulfil their role in order to provide a personalised service and respond to the needs of individuals (for example, where a tenant has a disability).

3.1.6 In additional to reviewing the policy for compliance with ICO guidance, the policy was also submitted to BrowneJacobson LLP, Solicitors to review compliance with current Data Protection legislation. Their comments have been incorporated into the final document.

3.1.7 It is recommended that the Board agrees the Group Data Protection Policy 2016-2019.

3.2 GROUP CODE OF CONDUCT

3.2.1 NCH uses the National Housing Federation (NHF) Code of Governance to measure its compliance with good governance practice. The Code recommends that organisations have one Code of Conduct applying to employees and Board Members across all bodies. This Code will set the standards across the Group and ensures culture and values are lived from the top down.

3.2.2 The Board Review Group produced a revised combined Code of Conduct last year. This has been updated to incorporate HR and legal implications and is
currently being consulted on with trade unions. The Code is attached as Appendix 2. All of the key provisions applying to Board Members remain in place including the main principles and responsibilities, conflicts of interest, behaviour and conduct.

3.2.3 It is recommended that the Board agrees the Group Code of Conduct and delegates final sign off to the Chair once consultation with trade unions is concluded.

3.3 CHAIR APPOINTMENT PROCESS

3.3.1 The Board at their meeting on 28 January 2016 agreed the principle of appointing a Chair though an internal application and interview process and agreed that should the post remain vacant after this process, it would be advertised externally.

3.3.2 It is proposed that Board Members who wish to be interviewed for the position of Chair of the Board submit a Letter of Application detailing the reasons why they believe they should be considered for this position and how they meet the criteria for Chair. This Letter of Application will be sent in the first instance to the Governance Team the week commencing 16 May 2016.

Those Board Members would then be invited to attend an interview panel made up of other Board Members, supported by the Chief Executive and the Company Secretary and an external independent assessor.

Those applications that the Panel support following the interview process will be put forward for election. If there is only one suitable candidate after this process, they will be deemed to be the Chair Elect and will take office at the first Board Meeting after the AGM in September, and their tenure will be for 12 months.

If, following the interview, the Panel deem that no applicants are suitable for the position of Chair of the Board, or if no applications are submitted, the position will be advertised externally. External applicants would then be interviewed by the same panel. Any successful candidate will take office at the first Board Meeting after the AGM in September, and their contract will be for three years, including annual break clauses related to performance and appraisals.

3.3.3 It is anticipated that the following timetable will be implemented:

- Current Board Members submit an Letter of Application for the position of Chair in the week commencing 16 May 2016.
- Interviews to take place week commencing 23 May 2016.
- Elections of suitable candidates to commence / external advertising of Chair position week commencing 6 June 2016.

3.3.4 With regard to the appointment of Tenant Board Members, it is recommended that NCH moves to a selection process rather than an election process as was undertaken last year. Feedback from attendees that did not go on to make an application last year was that they felt the requirements to be a Board Member was daunting and that this had put them off applying.

It is therefore proposed that an open invitation is made to all Tenants, who are
then invited to submit a Letter of Application to become a Board Member, stating
the reason why they believe they should be considered for a position on the
Board and how they meet the criteria for a Board Member. Support will be
available to interested Tenants during this process. This Letter of Application
would be sent in the first instance to the Governance Team the week
commencing 20 June 2016.

Those applicants would then be invited to attend an interview panel made up of
current Board Members, supported by the Chief Executive and the Company
Secretary. The panel will then select the most suitable applicant to fill the
vacancy or vacancies.

3.3.5 It is anticipated that the following timetable will be implemented:

- Tenant members submit a Letter of Application for the position of Tenant
  Board Member week commencing 20 June 2016.
- Shortlisting to take place week commencing 27 June 2016.
- Interviews to take place week commencing 11 July 2016.

3.3.5 It is recommended that the Board agrees the process and timetable for Chair
appointment and the move to a selection process for Tenant Board Members.

3.4 SOCIAL HOUSING EQUALITY FRAMEWORK (SHEF) ASSESSMENT

3.4.1 Over the past two years NCH has worked towards achieving “Excellence” in the
SHEF with the aim of using it to drive diversity across the organisation. We
were assessed by the Local Government Association (LGA) last month against
the following elements:

- Knowing your customer and equality mapping.
- Leadership, partnership and organisational commitment.
- Community engagement and satisfaction.
- Responsive services and customer care.
- A progressive and diverse workforce.

SHEF were satisfied that NCH meets the criteria for the “Excellent” Level.

3.4.2 The Company received some excellent feedback from the LGA including the
level and quality of tenant profiling undertaken, our commitment to dealing with
Anti-Social Behaviour and the support given to vulnerable tenants and others
experiencing welfare reform. As an organisation the LGA commented on the
strong leadership provided by Board and EMT and the strength of the
partnership working with other bodies including the City Council. They
commented that NCH was “much more than just a landlord” where the “focus on
tackling disadvantage is part of the day job”. A copy of the final report will be
distributed to Board Members when it arrives in the next few weeks.

3.5 GROUP MODERN DAY SLAVERY ACT 2015, TRANSPARENCY IN SUPPLY
CHAINS

3.5.1 The Act makes provisions on slavery, servitude and forced or compulsory labour
and human trafficking, including provision for the protection of victims. It
requires organisations to prepare a slavery and human trafficking policy and a
statement each financial year setting out the steps the organisation has taken to ensure that slavery and human trafficking is not taking place in any of its supply chain and any part of its own business, or a statement that it has taken no such steps. This must be approved by Board. A commercial organisation must comply with the Act if it supplies goods and services, and has an annual turnover of £36m.

3.5.2 NCH has produced the attached policy at appendix 3 relating to the Act for Board approval. An annual statement is currently being prepared.

3.5.3 It is recommended that the Board agrees the policy.

3.6 USE OF COMPANY SEAL

3.6.1 The Board is asked to note the following use of the Company Seal.

3.6.2 TR1 Transfer of Title - The Seal was affixed on the 16 March 2016 for the purchase of 1 Kneeton Vale, NG5 3DR for £271,800. This property has been converted into two flats for the market rent arm of Nottingham City Homes Enterprises.

4 FINANCIAL, LEGAL AND RISK IMPLICATIONS

4.1 Financial Implications

4.1.2 There are no significant financial implications; costs will be contained within previously agreed existing budgets.

4.2 Legal Implications

4.2.1 All of the initiatives within this report are carried out within legislation such as the Data Protection Act 1998 and NCH’s Governance processes. Legal implications are set out in the report where appropriate.

4.3 Risk Implications

4.3.1 A breach of the Data Protection Act could have serious implications on the reputation of NCH as well as financial penalties.

5 IMPLICATIONS FOR NOTTINGHAM CITY HOMES OBJECTIVES

5.1 Effective Data Protection management is conducive to ensuring that strategic objectives are achieved.

5.2 The Group Code of Conduct forms part of a suite of documents that will support the formation of the NCH RP which will help enable NCH in achieving wider corporate objectives.

5.3 The process for appointing a Chair of the Board will enable NCH in achieving wider corporate objectives.

6 EQUALITY IMPACT ASSESSMENT
6.1 Has the equality impact of these proposals been assessed?
☐ Yes (EIA attached)
☒ No (this report does not contain proposals for significant changes to process at this stage).

7 BACKGROUND MATERIAL AND PUBLISHED DOCUMENTS REFERRED TO IN COMPILING THIS REPORT

7.1 Data Protection Act 1998
ICO Advisory Visits to Social Housing Organisations Report 2014
Modern Slavery Act 2015

CONTACT OFFICER: George Pashley
Company Secretary
Loxley House
Station Street
Nottingham
NG2 3NJ
Tel: 0115 746 9485
E-mail: george.pashley@nottinghamcityhomes.org.uk

DATE: 17 March 2016
Group Data Protection Policy

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<td>6 January 2016</td>
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<tr>
<td>Version/Issue Number</td>
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<td>Scope of Document</td>
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<tr>
<td>Author/Reviewer</td>
<td>Cathy Dobb</td>
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<td>Head of Governance</td>
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DATA PROTECTION POLICY

Nottingham City Homes (“NCH”) recognises its obligations to comply with the requirements laid down in the Data Protection Act 1998 (“the Act”). NCH will need to collect personal data about its customers and staff in order to provide the services that they want.

Part 1

1. Introduction

The Act deals with information held about individuals. The Act gives the ‘data subject’ (the person the data is about) certain rights regarding their personal data (which is defined in the Act as data relating to living, identifiable individuals). The Act also regulates ‘data controllers’ (those who determine the purposes for which personal data is processed).

NCH is a data controller for the purposes of the Act, and must ensure that any processing of personal data for which it is responsible is in compliance with the Act.

NCH will not share customer or staff personal data with other organisations without the consent of customers or staff, unless NCH are required by law to do so.

This policy relates to data held on structured manual files in addition to data held electronically.

Under the Act, data controllers must comply with eight principles for handling personal information.

The Eight Data Protection Principles

These eight principles state that data must be:

1. Fairly and lawfully processed;¹
2. Processed for one or more specified and lawful purposes;
3. Adequate, relevant and not excessive in relation to those purposes;
4. Accurate and where necessary kept up to date;
5. Not kept longer than is necessary;
6. Processed in accordance with individuals’ rights under the Act;
7. Processed in accordance with appropriate technical and organisational measures being taken against unlawful or unauthorised processing, and against accidental loss, destruction or damage;
8. Not transferred to a territory outside the European Economic Area unless that territory country has adequate protection for the rights and freedoms of data subjects in relation to the processing of personal data.

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¹ Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless at least one of the conditions in Schedule 2 to the Act is met, and in the case of sensitive personal data at least one of the conditions in Schedule 3 is also met.
2. **Policy aim**

To ensure NCH complies with all relevant legislation and good practice when processing personal data.

3. **Policy objectives**

To achieve the overall aim NCH will:

3.1 Provide adequate resources to support an effective corporate approach to data protection;
3.2 Respect the confidentiality of personal information irrespective of the source;
3.3 Publicise NCH’s commitment to data protection;
3.4 Compile and maintain appropriate procedures;
3.5 Promote general awareness and provide specific training, advice and guidance to staff at all levels to ensure the relevant standards are met;
3.6 Monitor and review compliance with legislation and introduce changes to polices and procedure where necessary.

4. **Processing of information:**

NCH will, when processing personal data about any individual:

4.1 Observe fully the data protection principles and meet NCH’s obligations under the Act;
4.2 Meet its legal obligations to specify the purposes for which information is used;
4.3 Process personal data only to the extent that it is necessary for the purposes for which the data was obtained, to fulfil operational needs or to comply with any legal requirement.
4.4 Ensure that the individual about whom information is held can exercise their rights under the Act, including:
   4.4.1 the right to be informed that processing is being undertaken;
   4.4.2 the right to prevent processing in certain circumstances;
   4.4.3 the right to correct, rectify, block or erase information, which is regarded as; incorrect information; and,
   4.4.4 the right of access to personal information.
4.5 Take appropriate technical and organisational security measures to safeguard personal information
4.6 Ensure that personal data is not transferred outside the EEA unless suitable safeguards are in place.

5. **Access to personal data**

NCH will process requests for access to personal data in line with the relevant sections of the Act.

Requests must be made in writing, signed by the person that the information is about, addressed to the Company Secretary within NCH.
The person requesting the data must when making the request, provide their current address, proof of identification, date of birth, any other details that may help to locate the information and the prescribed fee\(^2\).

A person may ask a third party to request the information on their behalf, but they must provide written authorisation in order to do this.

A member of the Governance team will assess every request for access to personal data to establish:
- If the request is a valid subject access request or if more information is required from the requester;
- If more information is required this will be requested directly from the requester;
- If all information has been received, NCH will acknowledge the request and process the request (dependent upon the volume of the information and complexity of the redaction process) within 40 calendar days from receipt.

### 6. Data uses and purposes

6.1 All processing of personal data must be for a purpose that is necessary to enable NCH to perform its duties and services, and which has been notified by NCH to the Information Commissioner.

6.2 Personal data should only be processed in line with the notified purpose, or as otherwise required by law. If processing is required for a reason not already notified to the Information Commissioner’s Office, NCH’s registration with the Information Commissioner should be amended before processing can take place for that purpose.

6.3 All new occurrences of processing of personal data must be reported to the Company Secretary who is responsible for maintaining NCH’s data protection notifications.

6.4 All personal data should be regarded as confidential and its security protected accordingly. This also applies to information being processed by employees away from NCH’s offices. Employees should only remove personal data from the office with the authority of their line manager, Head of service or the Chief Executive. Any misuse or loss of such personal information or unauthorised disclosures whilst the information is in the control of employees or other breach of NCH’s policies and procedures may result in disciplinary proceedings. Information held by NCH must not be used for unauthorised non-NCH purposes.

6.5 Personal information should only be disclosed to persons or bodies (internal and external) who are listed for the purpose concerned in NCH’s current notification or where their authority to receive it has been explicitly established or otherwise required by law, e.g. where the information is required by the police for the prevention and detection of crime.

\(^2\) Currently £10
6.6 NCH may give information to third parties where a protocol has been drawn up and agreed between the parties and agreed by the Board and where the protocol forms part of the proper operation of NCH’s activities.

7. Scope

This policy applies to all employees, consultants, constructors and their partners, and others affected by the way NCH fulfils its undertaking (members of the public, visitors, clients, and residents).

NCH, acting as a custodian of personal data, recognises its legal and moral duties to ensure that it is handled properly and confidentially at all times, irrespective of whether it is held on paper or by electronic means. This commitment covers the whole lifecycle of the information including:

- The obtaining of personal data;
- The storage and security of personal data;
- The use of personal data; and
- The disposal / destruction of personal data.
Part 2

1. Actions

1.1 Introduction

By following and maintaining strict safeguards and controls, NCH will:

- Acknowledge the rights of individuals to whom the personal data relates, and ensure that these rights may be exercised in accordance with the Act.
- Ensure that personal data is processed ‘fairly and lawfully’.
- Ensure that personal data will only be processed for the purposes specified in the pursuit of NCH objectives.
- Collect and process personal data on a ‘need to know’ basis, ensuring that it is fit for purpose, not excessive, and is disposed of at a time appropriate to its purpose.
- Ensure that data is accurate and current.
- Ensure that for all personal data, appropriate security measures are taken, both technically and organisationally, to protect against damage, loss or abuse.
- Ensure that the movement of personal data is done in a lawful way, both inside and outside the organisation, and that suitable safeguards exist at all times.

1.2 Third Party requests for information

Third parties who wish to contact a tenant/resident or former tenant/resident will be advised that NCH will pass on any correspondence on their behalf, but under no circumstances will the address be divulged.

All press enquiries will be referred to NCH’ Chief Executive Officer or the Marketing & Communications Team who will act as the liaison between NCH and the Press.

1.3 Board Members' requests

Board Members have no formal rights to be given any personal data about tenants/residents, unless a specific confidential report is presented to the Board for approval.

Where a Board Member is asked to represent a tenant/resident, the Board Member must have written authorisation from the tenant/resident to disclose information. Only the information relevant to the enquiry will be discussed or disclosed.
1.4 Elected Members’ requests

Where a Member of an Elected Body receives a request, from a constituent/resident, to act on the individual’s behalf, NCH must be satisfied that the Member is genuinely acting on the individual’s behalf. This will normally be by way of a copy of the constituent’s letter to the Member, or, the Member or constituent’s verbal or written confirmation that it is the case. When the Elected Member is also a Board Member, the Elected Member / Board Member must have written authorisation from the tenant/resident to disclose information. Only information relevant to the specific enquiry will be disclosed provided it is not confidential or sensitive as defined by the DPA.

1.5 Employment applications

Information relating to applications made by prospective employees will be held for a period not exceeding six months from the date of the closing date stated in the advertisement. At the end of this period, the application forms of candidates not selected for employment will be destroyed. Anonymous information will be retained, including equal opportunities statistics of candidates for each position advertised by NCH.

1.6 Contracts and other Records

All contracts will contain a confidentiality clause preventing disclosure of NCH’s records by any contractor to a third party, without the written agreement of NCH.

1.7 Exemptions

1.7.1 In some circumstances, it may be appropriate to divulge information to specific third parties in accordance with legal requirements, for example to prevent a criminal offence from being committed, or to prevent the continuation of a criminal offence.

1.7.2 NCH will co-operate with the Police, where there is reasonable evidence of a crime being committed by a tenant/resident/employee of NCH, or where the information is to be provided under the provisions of the Crime and Disorder Act 1998. The procedure for such disclosure is as contained within the Information Sharing Protocol in place between the Police and NCH.

1.7.3 NCH will co-operate with Nottingham City Council (NCC) where there is reasonable evidence of a benefit fraud being committed by a tenant/resident.

1.7.4 Officers may also need to discuss individuals' circumstances with NCC Benefit Section, or the Benefits Agency, or with such agencies as the Citizens Advice Bureau.

1.7.5 In all cases, apart from those outlined in 1.7.1 to 1.7.4, NCH will seek written consent of the data subject before doing so and this will be held on file.
1.7.6 In addition, NCH may use tracing agents for the collection of former tenant/residents’ arrears and other debts owed to NCH, and information relevant to recovery of the debt, will be passed to them as part of the debt recovery process.

1.8 Website Privacy Policy

NCH will use its best endeavours to safeguard the privacy of its website visitors.

1.8.1 Data Processing
In some areas, NCH may ask customers to register their name and email address. NCH will also collect information from customers if they complete any other forms on its website or if they contact NCH with comments or specific requests.

If customers choose to complete any of NCH’s on-line forms, NCH will not use the personal information customers provide NCH with for marketing purposes or, between NCH and NCC for marketing services unless they have agreed that NCH may do so. Where such consent has been given we may pass these details to third party service providers who are contracted by NCH. These third parties are obliged to keep the customers’ details secure and will dispose of the details when the request is complete.

In agreeing to share these details, customers have not forfeited their rights as prescribed under the DPA and NCH will continue to apply the same level of care to safeguard their privacy and use of their information across all our services. Customer service entitlement from NCH will not be affected, should customers decide not to allow their data be shared in this way or they change their mind at any time in the future.

1.8.2 Email Messages
Customers may receive occasional e-mail messages from NCH on matters that we consider may be of interest to them, if they have provided their email address to us for this purpose and valid consent\(^3\) has been given prior to the marketing message being sent.

1.8.3 Website Cookies
NCH does not use cookies on our website to collect personal information. NCH only uses traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from our system. A cookie in no way gives us access to a customer’s computer(s) or any information about them, other than the data they choose to share with us.

\(^3\) For a consent to be valid it must be knowingly given, clear and specific.
1.9 Disposal of information

Where personal and/or confidential information is no longer required, it will be destroyed in accordance with NCH Documents Retention Policy.

1.10 Complaints in respect of this Policy

All employees will be informed of this policy and any complaints about breaches of the provisions of Policy should be reported to the Company Secretary as stated in the schedule within the Policy.

2. Enablers

In order to support these actions, NCH will:

2.1 Have a Designated Officer responsible for gathering and disseminating information and dealing with issues relating to information security, the DPA and other related legislation.

2.2 Ensure that all activities that relate to the processing of personal data have appropriate safeguards and controls in place to ensure information security and compliance with the Act.

2.3 Ensure that all contracts and service level agreements (SLAs) between NCH and external third parties (including contract staff), where personal data is processed, make reference to the Act where appropriate.

2.4 Ensure that all staff (including contract staff), acting on NCH’s behalf, understand their responsibilities regarding information security. This will include ensuring that they receive the appropriate training, instruction and supervision so that they carry their duties out effectively.

2.5 Ensure that staff (including contract staff), are only given access to personal data that is appropriate to the duties they undertake.

2.6 Ensure that all third parties acting on NCH’s behalf are given access to personal data that is appropriate to the duties they are undertaking and no more.

2.7 Ensure that any requests for access to personal data are handled courteously, promptly and appropriately, ensuring that either the data subject or their authorised representative have a legitimate right to access under the Act, that their request is valid, and that the information provided is clear and unambiguous.

2.8 Review this policy and the safeguards and controls that relate to it annually to ensure that they are still relevant, efficient and effective.
Schedule to Nottingham City Homes’ Data Protection Policy

This schedule shall be read in conjunction with the Data Protection Policy, and shall be regarded as part of the Policy in its entirety.

1. Designates
   1.1 The Company Secretary of NCH shall be the Designated Officer to deal with: gathering and dissemination of information, any issues relating to information security, and all statutory duties arising under the Data Protection Act 1998, and/or any other related legislation.

   1.2 All Heads of Services and Managers within NCH shall be responsible for disseminating and monitoring compliance, by their respective service areas and employees, with the Data Protection Policy as set out by NCH. They shall make every effort to ensure that all employees understand their responsibilities on information security.

   1.3 All employees shall ensure that they process information according to the eight principles as set out in the Data Protection Policy. They shall also ensure that, where they are acting in conjunction with any third parties, the external parties are made aware of the NCH Data Protection Policy.

2. Breaches
   2.1 Any willful disregard or intentional breach of the Data Protection Policy by employees shall be regarded as a disciplinary offence and will be dealt with under NCH’ Disciplinary Procedures.

   2.2 Any willful disregard or intentional breach of the Data Protection Policy by consultants, constructor partners, and others affected by the way we fulfill our undertaking, shall be regarded as a breach of contract and treated as such.

3. Definitions
   In the Policy and Procedure guide:

   3.1 “Personal Data” means any data which relates to a living individual who can be identified from those data. This includes an expression of opinion about the individual or an indication of the intention of NCH/NCC or any other person in respect of the individual.

   3.2 “Data Subject” means an individual who is the subject of personal data.

   3.3 “Sensitive Personal Data” means personal data consisting of information as to -
      a. The racial or ethnic origin of the data subject,
      b. His/her political opinions,
      c. His/her religious beliefs or other beliefs of a similar nature,
      d. Whether he or she is a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992),
      e. His/her physical or mental health or condition,
      f. His/her sexual life,
      g. The commission or alleged commission by him/her of any offence, or
h. Any proceedings for any offence committed or alleged to have been committed by him/her, the disposal of such proceedings or the sentence of any court in such proceedings.

4. Data Security

4.1 NCH will ensure that appropriate security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

4.2 The Act requires NCH to put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data may only be transferred to a third party data processor if he agrees to comply with those procedures and policies, or if he puts in place adequate measures him or herself.

4.3 Maintaining data security means guaranteeing the confidentiality, integrity and availability of the personal data as follows:

4.3.1 Confidentiality means that only people who are authorized to use the data can access it.

4.3.2 Integrity means that personal data should be accurate and suitable for the purpose for which it is processed.

4.3.3 Availability means that authorized users should be able to access the data if they need it for authorized purposes. Personal data should therefore be stored on NCH’s central computer system instead of individual PCs.

4.4 Data Security procedures include:

4.4.1 Entry controls. Any stranger seen in entry controlled areas should be reported.

4.4.2 Secure lockable desks and cupboards. Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal data is always considered confidential).

4.4.3 Methods of disposal. Paper documents should be shredded. Floppy disks and CD-ROMS should be physically destroyed when they are no longer required.

4.4.4 Equipment. Data users should ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.

4.4.5 Authorised Access. Employees will only access and process data that they are authorised to deal with and have access to. Any employee able to access or view unauthorised data should report the same to the Company Secretary.
4.5 Any failure by an employee to comply with the Data Security procedures detailed above will be regarded as a disciplinary offence and dealt with under NCH's disciplinary procedure.

Guidance Notes on the NCH Data Protection Policy

Based on the need to comply with its statutory responsibilities as a Data Controller, NCH has produced a Data Protection Policy. The purpose of this guidance note is to help all employees identify sections of the policy that they need to consider.

All Employees are reminded that all requests for personal data will be handled centrally by the Company Secretary, irrespective of the Service Area, as long as the information is held by NCH. Where there are issues with the need to have channels of communications with some external bodies or there are issues with the urgency of such requests, these issues should be addressed to the Governance Team to be dealt with.

- Employees need to bear in mind that NCH must comply with the eight principles of the Act as set out clearly in the Policy. NCH’s duty covers the entire lifecycle of any information i.e. from obtaining to disposal of information.
- Section 1.2 of Part 2 covers scenarios where the third party is requesting information on a data subject but not on behalf of the data subject. Press enquiries are under the remit of the Marketing & Communications Team and so all such enquiries should be signposted appropriately.
- Section 1.3 of Part 2 provides that Board Members who are not an Elected Member / Councilor are to be treated just like any other as third party on requests for information on a data subject other than themselves.
- Section 1.4 of Part 2 provides that the release of information to a Councilor/elected member, including an Elected Member / Councilor Board Member can be made if the employee is satisfied that the Councilor/elected member is genuinely acting on behalf of the Tenant. Examples of what would be classed as satisfactory, is also stated here.
- Section 1.5 of Part 2 deals with the rights of applicants for employment with NCH.
- Section 1.6 of Part 2 covers the rights of the Company and Contractors in a Contractual relationship.

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CODE OF CONDUCT
BOARD MEMBERS, EMPLOYEES
AND INVOLVED RESIDENTS
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1. INTRODUCTION

This Code of Conduct (“the Code”) defines the conduct required by all individuals directly involved in delivering the business activities of Nottingham City Homes (“the Group”). Except where otherwise indicated, the Code applies equally to Board Members, employees and involved residents.

The Code provides guidance on how to ensure that your actions and behaviour are consistent with the Group’s values and high standards of conduct required to maintain confidence in the Group and its work.

The Group’s values are that we are:

• Passionate about delivering outstanding services
• Respectful – to our colleagues, our customers, our communities
• Always looking for ways to improve
• Providing great value for money
• Committed to working effectively with each other, our customers and our partners.

Failure to comply with the Code may be an employment or governance disciplinary matter.

The Code is non contractual and may be amended by the Group from time to time.

2. GENERAL RESPONSIBILITIES

You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of the Group, its residents and other service users.

• You must comply with the law, your terms of employment or appointment and the Group’s policies and procedures relating to your role.

• You must not conduct yourself in a manner which could reasonably be regarded as bringing the Group into disrepute. This includes membership of, or participation in, activities organised by groups or organisations whose values are inconsistent with the Group’s (for instance racist organisations) which could create reasonable doubt in your ability to comply with the Group’s values and this Code.

• You must not, at any time, bring the Group’s name into disrepute or affect its integrity by your actions or words. This includes the use of, or entries on, social networking sites. This also applies if you do not name the Group but where it can reasonably be inferred, or where you use a pseudonym but your identity can reasonably be inferred.

• You must not act in a way that unjustifiably favours or discriminates against any particular individuals, groups or interests. You must not act outside the Group’s established procedures in any matter concerning any resident and or other service users.
• You must not misuse your position, for example by using information acquired in the course of your duties for private interests or those of others.

• You must respect the principle of collective decision-making and corporate responsibility. This means that once the Board has made a decision you must support that decision.

• You must not engage in any political or campaigning activity that might compromise the position of the Group. Board Members with the exception of the Council Board Members or involved residents intending to stand for political office must discuss the matter with the Chair of the Board. Employees intending to stand for political office must discuss the matter with their line manager.

• You must give notice to an appropriate line manager, without delay, of any criminal charges you are facing (whether the employee feels the matter is relevant or not). If you hold a post exempted from the provisions of the Rehabilitation of Offenders Act you must also notify an appropriate line manager of any cautions, arrests or charges you have in connection with children.

• You must ensure that your personal details stored on Oracle are up to date at all times. It is your responsibility to update your personal details should they change. You must also document and report any absences during working hours, for whatever reason, on Oracle. If you have any further questions in relation to these requirements please contact Human Resources.

3. CONFLICTS OF INTEREST

You must take all responsible steps to ensure that no undeclared conflicts arise, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise.

• You must comply with the Group’s policies and procedures for declaring, recording and handling conflicts of interest. Amongst other things, these require you to declare in writing any personal interests which may, or may be perceived to, conflict with the duties of your role. Executive Directors are responsible for ensuring that all employees in their Directorates are aware of the need to register personal interests and that such interests will be recorded in the Group’s register of interest.

• You must ensure that your entry in the Group’s register of interest is complete, accurate and up-to-date and if your circumstances change at any time you must bring this to your line manager’s or Company Secretary’s attention immediately.

• Section 117 of the Local Government Act 1972 specifically requires all employees to declare in writing notice of any contract or proposed contract in which the Group is involved and in which the employee has a direct or indirect financial interest as soon as the employee becomes aware of it. You must declare such an interest, failure to do so may result in prosecution. Each interest declared will be assessed on an individual basis so the Group can make an informed decision as to whether the employee will be required to distance themselves from involvement in that item.
• You must comply with the Group’s policies and procedures relating to the application for employment or housing from employees, Board Members, involved residents or others to whom they are related or closely connected.

• You must not be involved in the recruitment process where you are related, or are closely connected, to an applicant. You must also not be involved in decisions relating to discipline, promotion, pay or benefits for any employee to whom you are related or closely connected. Any such relationships must be declared to the Company Secretary.

• You must not be involved in the appointment of a contractor or supplier where you are related, or closely connected, to an organisation or individual applying or tendering for a contract. You must declare any such relationship to your line manager. You must not be involved in establishing the terms of the contract, or its on-going monitoring and management, where you are related, or closely connected, to the contractor or supplier.

• If you are in any doubt as to whether your relationship with an applicant or employee would be considered as closely connected you must seek guidance from the Company Secretary.

• If you are involved in a tendering process and dealing with contractors you should be clear on the separation of client and contractor roles within the Group. Senior employees who have both a client and contractor responsibility must be aware of their obligations of accountability and openness.

• No employee shall ever use their position or employment with the Group to attempt to seek or obtain any gain, discount, reduced price or favourable service from any contractor or supplier used for private purposes by themselves or any individual associated with them.

• You must not use, or attempt to use, your position to promote your personal interests or those of any connected person, business or other organisation.

• If you are approached directly (because of your reputation/personal skills/knowledge) to speak at a seminar, lecture or course, and a fee is received for this, you may treat this fee as income for yourself.

Restrictions on other activities

• Board Members: Any Board Member (or employee) on PO level or above may not take up new employment or appointment during your term of office on the Board without the express consent of the Chief Executive. You must make the necessary declaration of interest. Any such work or position must not be harmful to the interests of the Group or interfere with your role as a Board Member.

• Employees: You must devote the whole of your working time to the work of the Group and shall not directly or indirectly be engaged in any other business or take up
additional employment without the written prior consent of the Group (which may be withdrawn at any time). You will not be unreasonably precluded from being engaged in another business or undertaking additional employment unless the Group considers that it may be, or become, harmful to the interests of the Group or may interfere with the your duties under your appointment/contract of employment.

- No personal business activity may be undertaken during normal working hours or on Group premises or using Group equipment.

- You must declare in writing any membership of an organisation classed as a secret society eg. the Freemasons. This will be recorded in a directorate register kept for that purpose.

A secret society is defined as:

“Any lodge, chapter, society, trust or regular gathering or meeting, which:

(a) is not open to members of the public who are not members of that lodge, chapter, society or trust

(b) includes in the grant of membership an obligation on the part of the member a requirement to make a commitment (whether by oath or otherwise) of allegiance to the lodge, chapter, society, gather or meeting; and

(c) includes, whether initially or subsequently, a commitment (whether by oath or otherwise) of secrecy about the rules, membership or conduct of the lodge, chapter, society, trust, gathering or meeting.

A lodge, chapter, society, trust, gathering or meeting as defined above, should not be regarded as a secret society if it forms part of the activity of a generally recognised religion.”

4. BRIBERY, CORRUPTION, GIFTS AND HOSPITALITY

You must not offer, seek or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisations.

- You must comply with the law and the Group’s policies and procedures in relation to Bribery and corruption; the giving, receipt, approval and recording of gifts and hospitality.

- The Standing Orders Part 2 – Financial Regulations states that all business related gifts and hospitality made to or declined by employees must be reported to Governance. The Group Secretary is responsible for maintaining a register of all gifts and hospitality made to or declined by the Group, its employees, Board Members and
involved tenants. Gifts and hospitality pre-paid by the Group do not need to be declared. All parties need to secure their managers approval before accepting hospitality.

- Under no circumstances shall cash gifts of any kind be accepted and any such offers shall be reported to the Company Secretary.

- Items such as calendars, pencils and minor stationery may be regarded as outside of these requirements. Items such as chocolates, a bottle of wine or similar gifts offered to employees should be accepted on behalf of teams/service areas rather than by the employee, and recorded as such with Governance for the register.

- Board Members, employees and involved residents shall refuse all hospitality and gifts offered by an individual, supplier and/or other organisation that might influence or be seen to influence a contractual or material matter.

- It is a conduct matter for any person to use their position within the Group to offer, request, induce or accept any gift (for the purpose of these regulations, gifts shall include any bequests made to Board members and employees), reward or other incentive while undertaking work in an official capacity. Such acts seriously undermine the public image of the Group and as a result the Group will discipline all employees found to be in breach of the Financial Regulations on the grounds of gross misconduct.

- Where an outside organisation wishes to sponsor or is seeking to sponsor a Group activity, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts or hospitality apply. People are not discouraged from seeking Group sponsorship, but we want to be sure that it this is done legitimately and within the provisions laid out in this Code.

5. FUNDS AND RESOURCES

You must not misuse the Group’s funds or resources.

- You must comply with the Group’s policies and procedures regarding the use of its funds and resources. ‘Resources’ includes staff, information, telephone, computer and other IR facilities, equipment, stationery and transport.

- You must comply with the Group’s policies and procedures regarding procurement, ensuring value for money and fairness in decision-making.

- You must comply with the Group’s policies and procedures relating to the acceptable or unacceptable use of email, intranet and internet services.

- You must claim reimbursement only for expenditure that was properly and reasonably incurred in carrying out the Group’s business. You must ensure that any expenses claim you make is accurate and complies with the Group’s policies and procedures.

6. CONFIDENTIALITY
You must handle information in accordance with the law and the Group’s policies and procedures.

- You must comply with the provisions of the Data Protection Act 1998 (“the DPA”) which governs the protection of personal data. All personal data held about residents and other service users, employees and others, whether on paper or held electronically is subject to the provisions of the DPA. The Group’s policies and procedures give further guidance.

- You must not, either during your employment (except in the proper performance of your duties) or at any time (without limit) after the termination of your employment:
  
  (i) Divulge or communicate to any person, Company, business entity or other organisation;

  (ii) Use for your own purposes for any purposes other than those of the Group; or

  (iii) Through any failure to exercise due care and diligence, permit or cause any unauthorised disclosure of;

any Confidential Information, provided that these restrictions shall cease to apply to any information which shall become available to the public generally otherwise than through an unauthorised disclosure by yourself or any other person.

**Confidential Information** means any information (whether or not recorded in documentary form, or stored on any magnetic or optical disk or memory) relating to the business, products, affairs and finances of the Group for the time being confidential to the Group and trade secrets including, without limitation, technical data and know-how relating to the business of the Group or any of its business contacts.

- You must not, without permission, pass or distribute to the press or media or any other external recipient(s) information or materials relating to the Group.

7. RESPECT FOR OTHERS

You must treat others with respect at all times

- You must comply with the law, the Group’s policies and procedures relating to equality and diversity and the Group’s values.

- You must not harass, bully or attempt to intimidate any person.

- You must not display materials in the workplace which other people might reasonably find offensive or use language which Board and work colleagues or customers might reasonably find offensive. The Group’s policies give further guidance on all these areas.
8. RELATIONSHIP BETWEEN BOARD MEMBERS, EMPLOYEES AND INVOLVED RESIDENTS

Board Members, employees and involved residents must maintain a constructive, professional relationship based on a sound understanding of their respective roles.

- As a Board member, you have a duty of loyalty and support towards the Group and this must be reflected in a constructive, professional relationship with its employees.
- As a Board member, you must not go beyond your role as a Board Member and become inappropriately involved in operational matters.
- As a Board member, in your dealings with employees, formally and informally, you must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies and Corporate Plan of the Group. A copy of the Corporate Plan can be found on the Nottingham City Homes website.
- For Board members and involved residents, where it is necessary to raise issues of poor performance at a formal meeting, these must be raised in a constructive way. Any concerns about the performance of individuals must be discussed in confidence with the Chair of the Board, Committee or panel, or with the Chief Executive.
- As a Board Member or an involved resident, you must not appear to undermine the authority of a senior officer in his or her dealings with a more junior member of staff.
- As a Board Member or an involved resident you must avoid inappropriate personal familiarity with employees.
- As a Board Member or an involved resident you must not ask or encourage an employees to act in any way which would conflict with compliance with this Code or the Group’s policies and procedures.
- As an involved residents you must not seek to instruct or direct an employee or contractor.
- As an employee if your work brings you into contact with the Board, a Committee or residents'/service users’ Committee or Panel, you must take direction from the Board, or in accordance with any delegated authority of a Committee or panel; respond constructively to questioning or challenging and respond willingly to requests for information.

9. RELATIONSHIP WITH RESIDENTS AND OTHER SERVICE USERS

You must maintain high standards of professionalism, fairness and courtesy in all your dealings with residents and other service users.
• You must treat all residents and other service users with courtesy and respect.

• You must not allow any personal relationship with a resident or other service user to conflict with your role and responsibilities.

• You must take great care in handling residents’ and other service users’ money, ensuring that a receipt is completed for every transaction.

• You must not invite or influence a resident or service user to make a will or trust under which you are named as executor, trustee or beneficiary.

10. HEALTH, SAFETY AND SECURITY

Your conduct must not endanger the health, safety or security of yourself and others.

• You must comply with the Group’s health and safety policies and procedures and bring to the attention of the appropriate person any risks to yourself and others. In particular where you are provided with protective clothing this must be worn; and for your own safety, you must comply with the Group’s policy and procedures relating to lone working.

• You must comply with the law and the Group’s policies and procedures on smoking and on the use of alcohol, illegal drugs and other substances.

• You must comply with the Group’s policies relating to the security of premises.

11 CONDUCT AT MEETINGS

Your conduct at all Group and related meetings, including Board meetings must meet a high standard of integrity, commitment and courtesy.

• You must be courteous to all other meeting attendees and respect and support the position of the Chair.

• You must not use threatening or aggressive behaviour, or act in a disruptive way.

• You must not attend meetings while intoxicated or under the influence of drugs.

• Once a Board, Committee or panel meeting has properly reached a decision, you must share responsibility for that decision, even where you did not support it.

12 REPRESENTING THE GROUP

In representing the Group at external events and in dealings with external bodies, you must uphold and promote the Group’s values, policies and Corporate Plan.
• In engaging in activities which promote the work of the Group to the outside world, you must demonstrate commitment to the Group and support its values, policies and Corporate Plan.

• In representing the Group at formal and informal events, you must be appropriately dressed for the occasion.

13. LEARNING AND DEVELOPMENT

In partnership with the Group, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

• You must play an active part in the Group’s supervision and performance appraisal processes and welcome constructive feedback.

• At the appropriate induction, appraisal or supervision meeting, you must make clear your personal training and development needs, so that these can be taken into account in the Group’s forward budgeting and planning.

• Unless there are exceptional reasons, you must attend all learning and development events that have been arranged for you alone or as part of a group.

• Board Members – you must take responsibility for keeping your knowledge up to date in those areas on which you are a specialist.

14 REPORTING CONCERNS

You must report any reasonable and honest suspicions you may have about possible wrongdoing.

• If you are aware of potentially dishonest, illegal or fraudulent activity, or material breaches of this Code or any other Group code or policy, by Board Members, employees or involved residents, you must report such activity via the Group’s whistleblowing procedure.

• If you believe that you are being required to act in a way which conflicts with this Code, you must report it to the appropriate senior person in the Group.

• You must not victimise any person who has used or intends to use, or is suspected of having used the Group’s confidential reporting procedures to report a suspected wrongdoing of others. Please see the whistleblowing procedure for further information.

• You must inform the Company Secretary of any other matters that arise, or could reasonably be perceived to arise; which could be regarded as bringing the Group into disrepute such as pending court matters or similar.

15. TRUSTEES INDEMNITY INSURANCE
A trustee indemnity insurance policy has been put in place by the Group and covers loss in relation to wrongful acts committed by the Group, Board Members, employees and other officers including any volunteers.

The policy covers actual or alleged breach of duty, breach of trust, neglect, error, misstatement, omission, breach of warranty of authority, and any other act committed by any person in the course of the Group’s activities. The scope is wide enough to cover most of the scenarios where a person may be held liable. There are however exceptions and limitations as contained in the policy. It should be noted that acts of libel and slander are covered by the Group’s Public Liability Policy.

Board Members - If the matter in question does not fall under the exceptions the Board Member may claim compensation for loss incurred as a result of damages, judgements or settlements. Defence costs may also be claimed, subject to them being approved in advance by the insurer in writing.

16. POST TERMINATION OBLIGATIONS

For the purposes of this section the following definitions apply:

“Restricted Business” means the business of the Group at the Termination Date with which you were involved to a material extent during the twelve months immediately preceding the Termination Date;

“Restricted Person” means any person, firm, company or other organisation who, at any time during the twelve months immediately preceding the Termination Date was in the habit of dealing with the Group and with whom, during that period, you had material dealings in the course of your employment or were responsible for on behalf of the Group;

“Restricted Employee” means any person who, at the Termination Date, was employed or engaged as an employee, officer or consultant of the Group who could materially damage the interests of the Group if he/she become employed in any competing business and with whom you worked closely in the twelve months immediately preceding the Termination Date;

“Restriction Date” means the earlier of the Termination Date and the start of any period of Garden Leave;

“Termination Date” means the date of termination of the Employment (howsoever caused).

You will not without the prior written consent of the Group:

- for six months after the Restriction Date solicit or endeavour to entice away from the Company the business or custom of a Restricted Person with a view to providing goods or services in competition with any Restricted Business;
for six months after the Restriction Date provide goods or services to, or otherwise have any business dealings with, any Restricted Person in the course of any business concern which is in competition with any Restricted Business;

for six months after the Restriction Date induce, solicit or otherwise endeavour to entice away from the Group any Restricted Employee;

for six months after the Restriction Date employ or engage or facilitate the employment or engagement of any Restricted Employee; and

for six months after the Restriction Date be engaged or concerned in any capacity in any business concern which is competition with the Restricted Business.

These obligations extend to you acting not only on your own account but also on behalf of any other firm, company or other person and shall apply whether you act directly or indirectly.

While the restrictions in this section are considered by the parties to be reasonable in all the circumstances, it is agreed that if any such restrictions, by themselves, or taken together, shall be found to go beyond what is reasonable in all the circumstances for the protection of the legitimate interests of the Group but would be considered reasonable if part or parts of the wording of such restrictions were deleted, the relevant restriction or restrictions shall apply with such deletion(s) as may be necessary to make it or them valid and effective.

If you accept alternative employment or engagement with any third party during the period of any of these restrictions you must provide the third party with full details of these restrictions.
Declaration

I acknowledge receipt of the Nottingham City Homes Code of Conduct.

I acknowledge that it is my responsibility to fully read and understand the Code, to refer any queries to the Group Secretary for clarification, and to act in accordance with the requirements of the Code at all times.

I acknowledge that failure to act in accordance with the requirements of the Code could lead to disciplinary action being taken against me.

Signed:

Date:
Group Modern Slavery Policy
At Nottingham City Homes Group, we recognise the responsibility that we share with our suppliers, to buy materials and deliver our services in an ethical manner. As part of this commitment we acknowledge our responsibility towards the Modern Slavery Act 2015 and will ensure transparency within the organisation and with our suppliers of goods and services to NCH Group. The standards outlined are applicable across the whole of the NCH Group and all our subsidiaries.

We want our customers to be confident that our business partners treat their employees fairly, with respect for human rights and are not exposed to unsafe working conditions or in any way forced to work under slavery. We believe that when ethical standards are in place, this can improve worker well-being, productivity and quality, which benefits both our suppliers and our customers. Only suppliers who share our standards and values will be considered appropriate to trade with NCH Group and we seek to develop long-term trading relationships with suppliers based on the principle of fair, open and honest dealings at all times.

As a part of our company’s due diligence process we audit our suppliers on a regular basis and will only work with organisations who also commit to the eradication of slavery and human trafficking. Our appraisal process will incorporate a review of the controls undertaken by our suppliers and now also requires, from all suppliers, an annual statement of their commitment and actions taken to eliminate modern slavery.

Imported products sourced from outside the UK or EC are potentially more at risk of slavery or human trafficking issues. If products have to be sourced from such locations, we look to work in partnership with companies who possess certifications which have independently assessed standards that reinforce their commitment to human rights, working conditions and the provision of a living wage.

NCH Group will not work with any organisation that either has or is found to be knowingly involved within either human trafficking or modern slavery.

The Directors and Management shall be responsible for the application of this policy and ensure all activity complies with the Modern Slavery Act 2015. NCH Group will provide adequate resources, training and investment to ensure its successful application throughout the next financial year.
NOTTINGHAM CITY HOMES

REPORT OF THE INTERIM ASSISTANT DIRECTOR OF TENANCY & ESTATE MANAGEMENT

31 MARCH 2016

GROUP TENANT & LEASEHOLDER INVOLVEMENT STRATEGY 2016 - 2019

1 SUMMARY

1.1 The purpose of this report is to introduce the new Group Tenant & Leaseholder Involvement Strategy 2016 – 2019.

1.2 Tenant and leaseholder involvement is central to our vision “Creating homes and places where people want to live”. This strategy describes how Nottingham City Homes (NCH) will continue to achieve its vision and meet its corporate goals through listening to tenants and leaseholders and involving them in all aspects of decision making – truly keeping customers at the very heart of all that we do. The Strategy is attached as Appendix 1.

2 RECOMMENDATIONS

It is recommended that Board:

2.1 Consider and provide comment on the content of the Group Tenant & Leaseholder Involvement Strategy 2016 – 2019.

2.2 Delegate to the Chair of the Board the sign off of the finalised Group Tenant & Leaseholder Involvement Strategy 2016 – 2019.

3 REPORT

3.1 The delivery of the previous Tenant & Leaseholder Involvement Strategy 2012 – 2015 led to a number of successful achievements including:

- Established the Tenant Academy which has trained over 500 customers through a variety of different training courses. In 2015 the Academy celebrated its first graduation ceremony for tenants and leaseholders. The satisfaction performance figures for the Academy stands at 89.7% which greatly exceeds the current target of 80%.
- Successfully re-designed the more formal ‘Conference’ style approach by delivering two annual customer involvement activities;
  - the Tenant and Leaseholder Awards, attracting over 180 customers and providing the opportunity to showcase the great work they do in their local communities and;
- the Tenant Fun Day which attracts over 700+ people and reaches a more diverse range of customers.
- Developed and delivered strong ‘themed’ involvement activity including an award winning Equality and Diversity project, innovative youth projects, improved garden competition and successful delivery of the Groundwork/green space project.
- The alignment of funding opportunities e.g. Efficiency East Midlands, NCH Ten Years Anniversary, Just Grow and wider external funding to maximise the positive impact for our customers.
- Successfully securing just under £500k in a 3 year partnership with the city council to deliver the Fit in the Community project for NCH customers.

3.2 The new Group Tenant & Leaseholder Involvement Strategy will run from April 2016 to March 2019 providing new and innovative opportunities to develop our strategic and operational approach to customer involvement.

3.3 The new strategy was drafted in consultation with customers and with the additional and independent support of the Tenant Participation Advisory Service (TPAS).

3.4 The strategy will build on the positive involvement structures and initiatives already in place and drive forward continuous service improvement, creating new opportunities that contribute to our vision of “creating homes and places where people want to live”.

3.5 Social housing is experiencing unprecedented challenges e.g. The Welfare Reform and Work Act, and the Housing and Planning Bill and therefore this strategy reflects the even greater importance that tenants and leaseholders are at the forefront of service design and strengthened regulation.

3.6 This Strategy applies to subsidiary companies within the Group, including Nottingham City Council stock managed by NCH and stock developed through our registered provider and where appropriate also to the market rent subsidiary.

3.7 The Strategy identifies the following six service outcomes which provides the framework for the delivery of excellent tenant and leaseholder involvement services;

1. To ensure our tenants and leaseholders are well informed.

2. To ensure tenants and leaseholders are at the heart of what we do; setting service standards, monitoring performance and holding the organisation to account at all levels of decision making, from local communities through to Board level.

3. To create new and innovative involvement opportunities to
increase the numbers of tenants and leaseholders involved and ensuring all opportunities reflect the needs and aspirations of our diverse customers.

4. To inspire and empower tenants and leaseholders to make a difference in their neighbourhoods.

5. To strengthen the Tenant Academy.

6. To give tenants and leaseholders a voice; ensuring that their views are heard and that they are able to influence what happens within their neighbourhoods and at a regional and national level.

3.8 This strategy will maintain what is working well e.g. The Tenant Academy, support for Tenants groups whilst developing new initiatives such as ‘Involvement Week’, the Street / Block rep programme and ‘employability’.

4 FINANCIAL, LEGAL AND RISK IMPLICATIONS

4.1 Financial Implications
There will be no specific financial implication as this strategy will be driven through the TLI team, wider NCH teams and our involvement customers and existing TLI budget.

4.2 Legal Implications
None applicable

4.3 Risk Implications
If we fail to implement a strong and clear involvement strategy we could impact on the Corporate Plan risk – ‘Failure to retain support and satisfaction of customers for the company’.

5 IMPLICATIONS FOR NOTTINGHAM CITY HOMES’ OBJECTIVES

5.1 Tenant and leaseholder involvement is pivotal to our Corporate vision “To create homes and places where people want to live”, and its key objectives. The new TLI strategy clearly sets out how NCH will continue to achieve its vision and meet its corporate goals through listening to tenants and leaseholders and involving them in all decision making processes. Tenant and leaseholder involvement is fundamental to our business. Placing customers at the heart of what we do is the best way to improve our services and create pride, confidence and opportunities within our communities.

6 EQUALITY AND DIVERSITY IMPLICATIONATIONS

[Double click the box to complete]

6.1 Has the equality impact of these proposals been assessed?
☒ Yes (EIA attached as Appendix 2)

7 BACKGROUND MATERIAL AND PUBLISHED DOCUMENTS

Contact officers:
Name: Ann Lynch
Address: Loxley House
Tel: 0115 7469274
E-mail: Ann.Lynch@nottinghamcityhomes.org.uk

Date: 23 March 2016
Appendix 1

Group Tenant and Leaseholder Involvement Strategy 2016-19
Contents

Introduction
Key Involvement Strategy Achievements 2012 – 2015
Vision and Corporate Goals 2015 – 2018
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Delivering on our Outcomes
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Risks to delivering the Strategy
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Appendices

This is a Nottingham City Homes Group wide policy/strategy and its contents apply to any subsidiary company within the Nottingham City Homes Group, incorporating but not exclusive to Nottingham City Homes Registered Provider Limited (NCH RP), a company limited by guarantee which is Registered Provider and is regulated by the Regulator; and Nottingham City Homes Enterprises Limited (NCH Enterprises), a company limited by shares.
Introduction

Our Tenant and Leaseholder Involvement Strategy will run from April 2016 to March 2019 providing new and innovative opportunities to further develop our strategic and operational approach to customer involvement in consultation with our tenants and leaseholders.

Our previous strategy has been reviewed in conjunction with our customers and with external and independent support from the Tenant Participation Advisory Service (TPAS). This strategy will build on the positive involvement structures and initiatives already underway at Nottingham City Homes (NCH) and then strive to drive forward continuous service improvement, creating new opportunities to contribute to our vision of “creating homes and places where people want to live”.

Social housing is experiencing unprecedented challenges in 2016. The Welfare Reform and Work Act and the Housing and Planning Bill proposes to place significant restrictions on the Council and its tenants for example: lifetime tenancies will be abolished; tenant households earning £30k plus will have to pay market rents; new tenants will be subject to Local Housing Allowance caps on their housing benefit disproportionately affecting younger single people and the reduction in rent levels will significantly reduce investment in current and new homes.

Against this challenging backdrop, it’s even more important that customers are at the forefront of service design to ensure cost effective, modern and responsive services and further strengthen our commitment that by working together in true partnership with our customers we really can make a difference to services and local communities. Co-regulation and tenant scrutiny will also remain an integral part of our involvement strategy and we will ensure that our processes are strengthened, our customers are empowered and direct dialogue is guaranteed with the Boards of the Group.

It’s also an exciting time for the Nottingham City Homes group; we are working with Nottingham City Council to create hundreds of new council homes as well as developing new homes owned by Nottingham City Homes through our registered provider and market rent subsidiary. This Strategy applies to subsidiary companies within the Nottingham City Homes group, including Nottingham City Council stock managed by NCH and stock developed through our registered provider and where appropriate also to the market rent subsidiary.
Key Involvement Strategy Achievements 2012 - 2015

✓ Successfully implemented the new Tenant & Leaseholder Involvement structure creating a raft of new and wider reaching opportunities for customers to get involved.
✓ Established the Tenant Academy which has trained over 500 customers through a variety of different training courses. In 2015 the Academy celebrated its first graduation ceremony for tenants and leaseholders. The satisfaction performance figures for the Academy stands at 89.7% which greatly exceeds the current target of 80%.
✓ The Customer Excellence Panel has completed four service reviews with all recommendations being accepted by the Board.
✓ The development of a fully trained ACE inspector team to deliver the Neighbourhood Assessment programme, Void inspections, Judging the NCH Garden Competition and work commissioned by the Customer Excellence Panel and other customer panels.
✓ Successfully merged Area Panels into the Area Committee structure with representation from NCH tenants and leaseholders now at an area level.
✓ Successfully re-designed the more formal ‘Conference’ style approach by delivering two annual customer involvement activities;
  - the Tenant and Leaseholder Awards, attracting over 180 customers and providing the opportunity to showcase the great work they do in their local communities and;
  - the Tenant Fun Day which attracts over 700+ people and reaches a more diverse range of customers.
✓ Increased our community based activities by introducing Tenant & Leaseholder Involvement roadshows – taking involvement out into the community.
✓ Developed and delivered strong ‘themed’ involvement activity including an award winning Equality and Diversity project; innovative youth projects; improved garden competition and successful delivery of the Groundwork/green space project.
✓ The alignment of funding opportunities e.g. Efficiency East Midlands, NCH Ten Years Anniversary, Just Grow and wider external funding to maximise the positive impact for our customers.
✓ Successfully securing just under £500k in a 3 year partnership with the city council to deliver the Fit in the Community project for NCH customers.
✓ Helped tenants to have their say on the Housing and Planning Bill.
Vision and Corporate Goals 2015 - 2018

Tenant and leaseholder involvement is central to our vision “Creating homes and places where people want to live.” This strategy describes how NCH will continue to achieve its vision and meet its corporate goals through listening to tenants and leaseholders and involving them in all aspects of decision making. NCH has four corporate goals as set out in the Corporate Plan 2015-18:

1. To be a first class housing organisation in the eyes of our tenants and leaseholders.
2. To be a major player in transforming the quality of life in our neighbourhoods.
3. To be a great place to work, widely respected as an efficient and professional organisation.
4. To generate new business, securing additional income to reinvest in Nottingham and our communities.

Achieving these goals requires the delivery of excellent services that are defined and monitored by our customers and which satisfy their needs and aspirations. Tenant and leaseholder involvement is fundamental to our business and to achieving these goals successfully. Placing customers at the very heart of what we do is the best way to improve our services, deliver customer-led regulation and create pride and confidence in our communities.

In consultation on the development of our Corporate Plan, the message from our tenants and leaseholders is very clear: What matters most is repairs and maintenance to the home, efficient services delivering value for money, tackling anti-social behaviour, making homes more energy efficient, and neighbourhoods. Meaningful customer engagement and involvement is essential to deliver on these priorities.

Strategy outcomes

We are passionate about providing a ‘four star’ tenant and leaseholder involvement service that delivers our vision and corporate goals. To achieve this we will work in partnership with our customers to ensure involvement is inclusive, meaningful and empowers them to make a difference to service delivery and to their neighbourhoods. We will provide our customers with the knowledge, skills and tools to empower them to do so and through a method that suits them best. To achieve this, we have developed six outcomes to deliver an excellent tenant and leaseholder involvement service:

1) To ensure our tenants and leaseholders are well informed.
2) To ensure tenants and leaseholders are at the heart of what we do; setting service standards, monitoring performance and holding the organisation to account; at all levels of decision making, from local communities through to Board level.

3) To create new and innovative involvement opportunities to increase the numbers of tenants and leaseholders involved ensuring all opportunities reflect the needs and aspirations of our diverse customers.

4) To inspire and empower tenants and leaseholders to make a difference in their neighbourhoods.

5) To strengthen the Tenant Academy.

6) To give tenants and leaseholders a voice; ensuring that their views are heard and that they are able to influence what happens within their neighbourhoods and at a regional and national level.

Delivering on our Outcomes

There are a number of key actions we will take over the next three years to achieve our tenant and leaseholder involvement outcomes which will be delivered by the annual Tenant and Leaseholder Team plans. The involvement structure is outlined in Appendix 1.

Outcome one: To ensure our tenants and leaseholders are well informed.

We are committed to communicating effectively with all our tenants and leaseholders. We will make sure our customers have access to the right information and opportunities to get involved by the most appropriate methods and mechanisms that suit them.

Our customers have told us that they want effective communications, to be kept informed about the things that matter to them most, and to be listened to – so they can be confident their views are heard and acted upon. We are committed to providing feedback to our customers – evidencing clearly where our customers have made a difference.

We currently use a number of methods to communicate to our customer including the new and improved NCH website and NCH newsletter; the Tenant and Leaseholder Involvement handbook; local and city wide events e.g. Tenant Fun day and social media including Facebook, Twitter and blogs to encourage tenants and leaseholders to get involved in new ways including the recent introduction of #I’m Involved! on our social media sites.

We will continue to:

➢ Build on our successful use of use of social media to support customer involvement.
Ensure all tenant involvement opportunities are promoted effectively, increasing the score for tenant satisfaction with opportunities to get involved.

Make tenant involvement a key theme of NCH News, with each edition featuring articles on how tenants have made a difference.

Work with our most involved tenants and leaseholders to promote and showcase the opportunities and benefits of involvement.

Ensure local communication to tenants and leaseholders about projects in their area and opportunities to get involved.

We will:

- Develop and implement a new Marketing and Communications Strategy to support the delivery of the involvement outcomes of this strategy.
- Review the Tenant and Leaseholder Involvement handbook and make this available online.
- Make full use of CRM to identify individual interests and prepare bespoke communications.

Outcome 2: To ensure tenants and leaseholders are at the heart of what we do; setting service standards, monitoring performance and holding the organisation to account; at all levels of decision making, from local communities through to Board level.

The foundation of co-regulation is accountability through a 'customer centred approach' for services delivered and ensuring effective processes are in place for dealing with issues or problems that may arise. NCH welcomes the opportunity to take a robust approach that includes evidence based self-assessment, external challenge and regular reporting to customers.

- **Board.** We are very proud of the involvement our tenants and leaseholders have at the centre of the Company's decision making forum, the Board. Tenants and leaseholders are the majority group on the Board and the current Chair of the Board is also a tenant. We are committed to ensuring that tenants and leaseholders are at the heart of the highest level of decision making in the Company.

We will continue to:

- Ensure that there is good succession planning in place to ensure that the Board remains fresh and new tenants and leaseholders are fully equipped to take up Board member roles.

We will:

- Broaden the Tenant Academy programme to play a key role in developing new tenant and leaseholder talent.

- **Customer Excellence Panel (CEP).** CEP is the customer panel who proactively reviews
and challenges our work to ensure the delivery of corporate goals and objectives; ensures that tenant and leaseholders are involved in our decision making processes; and that our strategic direction in service delivery reflects customer needs and aspirations. The CEP work to an agreed six stage process and deliver an annual programme of service reviews based on three key work streams ‘Your Home,’ ‘Your Neighbourhood,’ ‘Your Service’ (see appendix 2). Furthermore, NCH has recently changed governance arrangements opening up an exciting opportunity for CEP to take a leading role in scrutinising company performance.

**We will continue to:**

- Further develop the role of CEP to set challenging service standards through service reviews and monitor our performance against those; benchmark our services against similar organisations as well as learning from national good practice.
- Drive forward the clear linkages between the annual service review programme and the key findings from other customer panels and communicate these effectively to tenants and leaseholders.

**We will:**

- Support CEP to have the new responsibility for the independent monitoring and scrutiny of detailed quarterly performance reports and establishing a CEP representative to provide feedback to Board.

- **ACE Inspectors.** “Achieving Customer Excellence” Inspectors ("ACE") are an integral part of the NCH four star promises concept, providing an independent assessment of service standards on our estates, blocks of flats and Independent Living Schemes, as well as assessing the levels of partnership working and active customer involvement. As a panel of well-trained tenants, ACE carry out 20 full neighbourhood assessments, a programme of mini assessments, take a lead role in judging the annual NCH Best Garden Competition and undertake an annual void inspections programme.

**We will continue to:**

- Drive up the standards of our neighbourhoods and the aspirations of our customers by revising our neighbourhood assessment framework to ensure that the assessment is much more challenging. In addition we can use this to identify opportunities for neighbourhood improvement driven by local communities.

**We will:**

- Develop opportunities for ACE and wider tenants and leaseholders to lead on community based customer consultations.
- Involve ACE inspectors as ‘critical friends’ on our large-scale projects e.g. ‘capital projects and new build projects ensuring quality services for customers by working with NCH and alongside our major contractors.

- **Customer Complaints Panel** acts as a review panel for tenant and leaseholder complaints and provides regular reports to the Customer Excellence Panel on NCH
complaints management. The Customer Complaint Panel is responsible for reviewing complaints that have been through the NCH ‘3c’s’ process and provide the ‘customer’s perspective’ during complaint reviews ensuring that learning from complaints is identified and implemented as service improvements. The Panel also has a role in referring complaints to the Single Housing Ombudsman.

We will:

- Strengthen and develop further the role of the Customer Complaints Panel by ensuring specific focus is placed on complaint patterns or trends so when identified, they are followed through with recommendations for more in-depth service reviews.

- The Communications Panel is responsible for reviewing all publications and information sent to tenants and leaseholders and ensuring they are jargon-free and in Plain English. They ensure information is relevant and delivered in the most appropriate formats. In reviewing this strategy, communication has been raised as a key barrier to involvement.

We will continue to:

- Strengthen and develop the role of the Communication Panel and promote the valuable work the Panel does.

We will:

- Introduce new methods for customer involvement in the Communications Panel to ensure that members of the Panel can be involved in ways that best suit them.

- Tenant Equality Panel supports NCH to ensure that our services and working practices meet the needs of our diverse communities and are able to raise concerns to the Customer Excellence Panel with a recommendation for more in-depth service reviews if necessary. The Equality and Diversity Steering Group are responsible for ensuring effective and co-ordinated actions to reduce inequalities and promote equality and diversity, oversee the delivery of actions in the Equality and Diversity Action Plan and ensure that recommendations arising from the SHEF peer review are implemented.

We will continue to:

- Support the Tenant Equality Panel to review, comment on, and contribute to equality impact assessments.
- Support the Tenant Equality Panel to review performance and progress on equality and diversity issues and to make challenging recommendations to Nottingham City Homes for improvements to policies and services.
- Support tenant representation on the Equality and Diversity Steering Group.

We will:

- Develop the panel to be more reflective in terms of age, gender and ethnicity to even better reflect our current tenant profile.
Provide more ‘Communications’ specification training via the Tenant Academy to create a stronger and more empowered Communications Panel.

Outcome three: To create new and innovative involvement opportunities to increase the numbers of tenants and leaseholders involved ensuring all opportunities reflect the needs and aspirations of our diverse customers.

We have a vibrant tenant and leaseholder customer base and a great track record of involving a diverse range of tenants and leaseholders. We have also seen some positive successes where some of our most involved tenants have successfully gone on to gain employment having gained the necessary skills, knowledge and confidence as a volunteer at NCH so it is therefore paramount that we continually renew our pool of involved tenants who are involved in activities and who can bring a wide range of perspectives and diversity to the role. We also know from experience that we need to be creative in the way we engage and involve our customers and move away from more formal forums.

- **To maximise the use of our technology:**

  **We will continue to:**

  - Use TP Tracker to develop tenant and leaseholder Involvement Profiles to determine who is involved and whether this is representative of our community demographics. TP tracker will also help us to target specific projects and involvement opportunities to those they will appeal to most and in which areas of the city.

  **We will:**

  - Explore opportunities for our new Corporate CRM system to capture and manage involvement data.
  - Customer Insight - Not only do we want to know the demographic makeup of our customers but about their experiences, beliefs, needs or desires – what makes them tick! Customer insight is more than just data or research; it will help is to answer the question ‘but what’s in it for me’? We will link closely with NCH’s Customer Insight Strategy which sets out how we make use of information about our customers and the views that they have on our services to help us deliver and improve the way we work. We will seek to continue to broaden the diversity of the customers who get involved in this way, and increase the numbers involved too.
  - Social Media – We will take our use of social media to the next level to support customer involvement. We will develop a virtual social media ‘Shout Out’ platform for tenant involvement using Facebook, Twitter and blogs to encourage tenants and leaseholders to get involved in new ways including #I’m Involved! This virtual platform will provide us with a snap shot of opinions from a wide range of customers on topics that are current and important to them.

- **Deliver customer driven ‘Pop up’ events:**

  **We will continue to:**
Develop further our Problem solving events to respond to specific issues or problems affecting our customers. This has been tried and tested in pilots at Sherwood, and the Woodlands and the model has proved to be a successful way of gaining tenant’s views and importantly, their ideas.

Deliver creative TLI Roadshows which were introduced to take involvement out into the community, particularly targeting areas with little or no involvement activity. We will build on the great successes we have achieved so far - many new people are now involved with customer panels, the take up of Academy courses and we’ve seen the development of new tenants groups.

We will:

- Develop and deliver a NCH ‘Involvement Week’ campaign – this will be a focused approach to raising awareness of involvement and the important role it plays. We will promote our range of involvement activities and ask our customers for their ideas for new actives or approaches, to ensure there is something for everyone. Involvement week will be linked to the national Volunteer's Campaign and have an emphasis on building confidence and skills.

- We will target recruitment and involvement activities towards under-represented groups. We have made great strides over the last 3 years to improve the engagement and involvement of previously under represented group i.e. young people, families and those of working age by developing and delivering activities for young people; taking a new approach to our annual conference by developing the Annual Tenant Fun day; introduced stronger profiling of tenant involvement activities. But, we also know that more work still needs to be done.

We will continue to:

- Continue to work closely with our partners to identify where they are already engaging with harder to reach groups to encourage involvement with NCH activities.

We will:

- Investigate different and innovative ways including better use of TP tracker and CRM.

- Develop a number of projects to engage young people including arts and science projects; working with the British Olympic Association on the Get Set for the Community project and investigate other programme we can link closely with.

Outcome four: To inspire and empower tenants and leaseholders to make a difference in their neighbourhoods.

This strategy will place an increased importance of involvement at a local level. Tenants and Residents Associations (TRAs), community groups, Block Champions and Community Champions play a pivotal role in transforming the quality of life in our neighbourhoods and in developing thriving communities by holding services to account at a local level, taking
ownership of their neighbourhoods and driving up standards and aspirations.

We will continue to:

- Help new TRAs to set up.
- Support our customers to get involved with wider cultural activities and community projects such as the Nottingham carnival, MELA and Nottingham Pride events.
- Collaborate with our frontline Independent Living Services staff to further develop our intergenerational work.
- Empower TRA’s and community organisations to develop local projects that will make a lasting difference to the quality of lives in their neighbourhoods. We have seen great successes for community groups working with NCH to access funding opportunities via Efficiency East Midlands, NCH’s 10 year Anniversary Funding, WREN and more specific pots such as support from contractors and local businesses. This is something NCH is committed to develop further in the next 3 years of this strategy.
- Work with local TRA’s and wider community groups to link with or set up Neighbourhood Watch schemes working alongside local partners including the Police and Neighbourhood Watch teams.

We will:

- Place an increased emphasis to support and empower recognised community groups and TRA’s with funding and training opportunities.
- Actively involve and support tenants and leaseholders in the design and delivery of our Grander Designs and Decent Neighbourhoods programme and support tenant groups to add additional elements to these projects through external funding.
- Develop a new far reaching initiative, the Street Rep and Block Rep programme providing tenants with a flexible but supported structure to be involved with the upkeep of their street or block, look out for their neighbours and be a recognised contact for NCH ensuring valuable two way communication.

**Outcome five: Strengthen the Tenant Academy.**

Underpinning our involvement structure is the Tenant Academy. The Academy is open to all our customers providing free training and support for their own individual learning journey – see appendix 3.

The Tenant Academy produces a ‘core’ training programme that is distributed widely and offers a raft of training courses to meet the varying needs of our customers. It also creates bespoke packages to support and empower our customer panel members, ACE inspectors, TRA’s and community groups.

A key aim of the Tenant Academy under the ‘Your Work Way’ avenue is to tackle worklessness and to develop the confidence, skills and knowledge for those looking to gain meaningful employment by creating more accredited training opportunities linked to our Employability Strategy.
The Tenants Academy has a key role to play in developing new talent and ensuring tenant Board members develop their skills through targeted training and accreditation. We will ensure that good succession planning in place to ensure that the Board remains fresh and skilled and that tenants and leaseholders are fully equipped to take up Board member roles.

The Academy positively reacts to national influences and provides support and training to customers. For example, the introduction and roll out of Welfare Reform - Academy training package are being developed and delivered, focussing on those most affected by the changes.

We will continue to:

➢ Strengthen the Employability focus of the Tenant Academy and fully utilise this as an engagement tool to support the tenant’s journey into work.

➢ Encourage further partnership working with Nottingham City Council and key partners by offering the Tenant Academy as a platform to coordinate support for tenants that are accessing other employability provision.

➢ Explore further opportunities to support our tenants/resident in becoming self-employed and starting their own business.

We will:

➢ Review and update our Tenant Academy Communication plan ensuring effective and innovative ways to advertise and promote the training courses and the support that’s available to customers.

➢ Develop a dedicated Tenant Academy learning portal on the NCH website to guide customers on their learning journey linking in with the NCH ‘learning zone and ‘My worksearch’ programmes.

➢ Ensure robust succession planning is in place to offer support for budding and potential Tenant Board members.

➢ Ensure that the training we provide meets the needs of our customers and is of a high standard by developing and implementing a robust evaluation process. We will also ensure all courses have a positive impact for our customers and are value for money.

➢ Explore the opportunity to widen the Tenant Academy offer to other housing providers spread the benefit and generate income for the Tenant Academy.

Outcome six: To give tenants and leaseholders a voice; ensuring that their views are heard and that they are able to influence what happens within their neighbourhoods and at a regional and national level.

We are committed to ensuring that our customers are at the heart of all that we do, within our own organisation and in our partnership working. It is crucial that the views of our customers are heard and influence outcomes.
Partnership working is an essential and integral part of our work and is crosscutting all six themes within this strategy. We recognise that NCH is one of many organisations that provide services to our tenants and leaseholders and that it’s important that we ensure our customers are recognised and have a strong voice to influence other partners in the delivery of their services. By working together we can maximise the benefit to tenants and leaseholders, avoid duplication as well as consultation overload - many of our partners’ key audiences for consultation and involvement are our tenants and leaseholders.

We will continue to:

- Embed ‘Involvement’ within the culture of the Group and with frontline staff that play a key role in promoting and encouraging customer involvement through their daily interactions, building on the great steps already taken.
- Build on our successes and strengthen the relationship with our existing key partners to develop more opportunities for our customers and their neighbourhoods.
- Support tenant representation on Area Committees, ensuring they are representing their neighbourhoods effectively and feeding back.
- Use our communication networks with tenants as a conduit for other agencies to consult with our residents; and to promote events activities and volunteering opportunities for our tenants.
- Ensure that our tenants and leaseholders views are heard and influence policy at a national and regional level through membership and participation with the East Midlands Tenant Participation Forum and the Tenant Participation Advisory Service.

We will:

- Seek out new and creative partnerships to respond to emerging issues and the needs of our customers.
- Develop a ‘team specific’ ambassador role within all NCH staff teams to empower frontline staff e.g. Caretakers, Operatives, Rent Account Managers etc. to get involved with involvement!

**Resourcing the Strategy**

Tenant and leaseholder involvement a cross cutting responsibility and is integral to the work of many services at NCH. To support this, we have a dedicated Tenant and Leaseholder Involvement Team who are specifically resourced to support all service areas to embrace ‘Customer Involvement’ and help to deliver tenant and leaseholder involvement activities across the city and to give customers the opportunity to shape service delivery. The team has a dedicated annual budget for this purpose including the opportunities delivered through the Tenants Academy.

Resources will be made available to help tenants and leaseholders effectively participate. We will cover ‘out of pocket’ expenses as listed in the NCH Tenant Expenses Policy ensuring no customers are disadvantaged and access is available to all customers who want to get involved with us.
We will:

- Working closely with key partners to achieve common objectives, preventing duplication and maximising resources for customers.
- Access external funding opportunities. At a national level significant resource has been dedicated to supporting local community groups and third sector organisations to make improvements, as part of the localism agenda. Whilst NCH cannot directly receive this funding, we will support our tenants and leaseholders to access these opportunities to make a positive difference in their communities.
- Utilise external funding to support the Tenant Academy. NCH already utilises external training to support customer development and have already successfully levered in many courses free of charge. We will continue to work with local and national colleges and training organisations to identify these opportunities to maximise the training and employment available to tenants and leaseholders.

Value for Money and Financial Implications

Involving tenants and leaseholders delivers excellent ‘value for money’ to the Company and for our customers. Effective involvement enables us to identify what services tenants and leaseholders view as priorities, where they think the gaps in those services are and what can be done to make improvements. Customers can feel more of a sense of belonging and ownership and are happier with the organisation. This will have a huge impact on customer satisfaction and our reputation.

Working alongside the Chartered Institute of Housing we have developed an effective, in-house model to capture and evidence the cost/benefit and social impact of tenant and leaseholder involvement. The model will be used to measure the cost and benefits of NCH’s customer involvement activities for both the customer and the Group and provide evidence to support decisions on whether an activity should be continued, be modified or discontinued.

Equality and Diversity Implications

This strategy has strong links to our Equality and Diversity Strategy which is committed to promoting equality and embracing and celebrating the diversity of our customers and employees. This strategy will contribute to our Equality objectives to:

- To achieve excellent status in the Social Housing Equality Framework.
- To build a network of partnerships with community organisations that helps us meet the needs of minority and vulnerable tenants.
- To equalise satisfaction levels for tenants and employees in protected groups.

An Equality Impact Assessment (EIA) has been completed for this strategy, in partnership with our tenants. The EIA has considered the impact of this strategy on all protected characteristics of our tenants and leaseholders.

Risks to delivering the Strategy

A risk assessment has been undertaken for this strategy and the team. Key risks are listed in
the table below along with actions we will take to mitigate these risks.

<table>
<thead>
<tr>
<th>Risk to delivery of this strategy</th>
<th>Actions to be taken to mitigate</th>
</tr>
</thead>
</table>
| Failure to deliver the key outcomes of the Strategy. | • Regular review of progress through Covalent.  
• Tenant and Company/Board support for the outcomes.  
• Active training programme for tenants and leaseholders; Board members; and employees. |
| New involvement activities are not fully developed. | • There is a dedicated team in place and dedicated resources that will focus on embedding the new strategy.  
• Lead areas have been identified across each of the Tenant and Community Involvement Managers. These require specific skills sets to ensure that new involvement activities will be delivered successfully.  
• Delivery of this strategy will be monitored via TLI team plan and Covalent. |
| Tenant and leaseholder involvement including the role of scrutiny, is not embedded across NCH. | • Involvement is now part of the company induction course ensuring buy-in from the start.  
• Training for staff will be provided to ensure that involvement is embedded.  
• All areas of the business have been allocated to each of the Tenant and Community Involvement Managers to act as their key contact and support.  
• The scrutiny function will be supported by several teams that cut across the organisation to ensure that responsibility is shared. |
| Narrow profile of customers involved. | • We will develop Tenant and Leaseholder Involvement Profiles against each activity to demonstrate whether they are representative of local communities.  
• We will use existing and develop new partnerships to engage with harder to reach groups.  
• We will develop a wide range of methods to get involved to suit different needs.  
• We will develop a new communication plan to support this strategy and to ensure that we attract a wide and diverse range of involved tenants. |
| Low number of customers involved. | • We will develop a new and effective communication plan to ensure that we attract a wide and diverse range of involved tenants.  
• We will train and support tenants and leaseholders through the Tenant Academy and encourage them to become involved with other NCH areas in different ways once their training has been completed.  
• We will work with frontline staff to identify interested tenants and leaseholders and encourage them to become involved. |
<table>
<thead>
<tr>
<th>Risk to delivery of this strategy</th>
<th>Actions to be taken to mitigate</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• We will develop a wide range of methods to getting involved to suit different needs.</td>
</tr>
<tr>
<td></td>
<td>• We will work closely with our involved tenants to sustain involvement and provide a menu of involvement options.</td>
</tr>
</tbody>
</table>

**Monitoring and reviewing the strategy**

The Tenant and Leaseholder Involvement team plan will support the delivery of this strategy which will be performance managed through our electronic performance system Covalent to ensure that targets and actions are completed on time. It will be monitored regularly and reviewed on an annual basis with our customers.

Regular reports will be produced to demonstrate how the strategy's key outcomes are being met.

<table>
<thead>
<tr>
<th>Corporate Goal</th>
<th>Performance Measures</th>
<th>2014/15 actual</th>
<th>2018 target</th>
</tr>
</thead>
<tbody>
<tr>
<td>To be a first class housing organisation in the eyes of our tenants and leaseholders.</td>
<td>Tenant satisfaction that NCH takes their views into account and acts on them.</td>
<td>74.8%</td>
<td>81%</td>
</tr>
<tr>
<td></td>
<td>Satisfaction with the involvement opportunities offered by NCH.</td>
<td>68.84%</td>
<td>85%</td>
</tr>
<tr>
<td></td>
<td>Tenant satisfaction with training course meeting their expectations.</td>
<td>New target</td>
<td>85%</td>
</tr>
<tr>
<td></td>
<td>Overall satisfaction with the experience of the ‘Annual Tenant and Leaseholder Awards’.</td>
<td>New target</td>
<td>95%</td>
</tr>
<tr>
<td>To be a major player in transforming the quality of life in our neighbourhoods.</td>
<td>% of neighbourhood assessments meeting 4 star ACE inspector rating.</td>
<td>90%</td>
<td>100%</td>
</tr>
</tbody>
</table>
Appendix 1 the Tenant & Leaseholder Involvement Structure

NCH Registered Provider
Subsidiary Company
Coterminous Board with NCH

Nottingham City Homes
Parent Company
ALMO
Coterminous Board with NCH RP

Audit Committee
HR Sub Committee

Customer Excellence Panel
Customer Complaints Panel
Communications Panel
Equality Panel

ACE Inspectors

Feedback via
#I'm involved!

Local Structures

Tenant Academy
Appendix 2: Customer Excellence Panel Work Streams

Customer Excellence Panel

Your Home
- Repairs
- Gas Servicing
- Decent Homes
- Capital Programme
- Voids

Your Neighbourhood
- Tenancy
- Estates
- Rents
- ASB
- Caretaking
- Supported Housing

Your Service
- Leaseholder
- Procurement
- Allocations
- Customer Service Centre
- Tenant & Leaseholder
- Involvement
- Corporate Services

Achieving Customer Excellence (ACE) Inspectors
Appendix 3: Tenant Academy – ways to get involved
**What is being assessed:**
Group Tenant and Leaseholder Involvement Strategy 2016 - 2019, The strategy aims to:

1) To ensure our tenants and leaseholders are well informed
2) To ensure tenants and leaseholders are at the heart of what we do; setting service standards, monitoring performance and holding the organisation to account; at all levels of decision making, from local communities through to Board level.
3) To create new and innovative involvement opportunities to increase the numbers of tenants and leaseholders involved ensuring all opportunities reflect the needs and aspirations of our diverse customers.
4) To inspire and empower tenants and leaseholders to make a difference in their neighbourhoods
5) To strengthen the Tenant Academy
6) To give tenants and leaseholders a voice; ensuring that their views are heard and that they are able to influence what happens within their neighbourhoods and at a regional and national level.

**Information we are using to analyse the effects on equality:**
Consultation on the effectiveness of the 2012-15 strategy and the requirements of the 2016 to 19 strategy has been conducted with our most involved tenants from our customer panels. Additionally we have used robust evaluation and feedback information from Involvement activities and events.

<table>
<thead>
<tr>
<th>People from different ethnic groups</th>
<th>Could particularly benefit (X)</th>
<th>May adversely impact (X)</th>
<th>How different groups could be affected - summary of issues identified</th>
<th>Details of actions to increase positive or reduce negative impact (or why action is not possible)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>The TLI Strategy is robust in its approach to involving people from all ethnic backgrounds that live in NCH properties or on our estates. Provision is made within the strategy to recognise and have a presence at the Hyson Green Festival and Carnival, Pride and other festivals involving and promoting those with protected characteristics. EEA (European Economic Area) nationals with poor grasp of English could be detrimental to getting involved. Community groups and /TRA’s are encouraged to have an equal opportunities statement within their constitution and to actively involve all sections of their community.</td>
<td>Decision was taken in 2016 not to attend Asian Festival of Mela because not enough NCH tenants were attending. Translators are available for staff to use when consultation on services is being conducted and information is made available in community languages where required. Carry out equality monitoring of involved and recognised groups in order to ensure equality issues are not missed.</td>
</tr>
<tr>
<td>Men, women (including maternity/pregnancy)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact</td>
<td>Disabled people or carers</td>
<td>People from different faith groups</td>
<td>Lesbian, gay or bisexual people</td>
<td>Older or younger people</td>
</tr>
<tr>
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</tbody>
</table>

- **24%** of tenants are BME. Potential for less awareness of the policy and service amongst the protected characteristics.
- Those with disabilities could find it more difficult to participate in involvement and consultation activities.
- There may be a reluctance to get involved from this section of the community following perception that they may experience prejudice form involved members of groups.
- Ethnic make up of the NCH Board and customer panels reflects the BME make up of tenants. We will target recruitment and involvement activities towards under-represented groups to improve the engagement and involvement of previously under represented group i.e. young people, families, disabled and transgender individuals and those of working age.
- We have introduced stronger profiling of tenant involvement activities.
- A robust tenant expenses policy has been developed to ensure barriers to involvement for all our customers is reduced.
- All involved tenants on customer panels and the board have to undertake equality training. This will be extended to include all TRA members of recognised groups and staff members.

**Outcome(s) of equality impact assessment:**
- No major change needed ☒  
- Adjust the policy/proposal/service ☐  
- Adverse impact but continue ☐  
- Stop and remove the policy/proposal ☐

**Arrangements for future monitoring of equality impact:**
- The TLI Equality Impact Assessment will be reviewed annually in line with the Tenant and Leaseholder Involvement Team Plan.

Approved by (manager signature): Ann Lynch  
Date sent to equality team for publishing:

Return to agenda
1 SUMMARY

1.1 The purpose of this report is to present the Customer Excellence Panel’s (CEP) service review report on New Tenancy Visits (NTVs) – Performance and Quality attached as Appendix 1.

2 RECOMMENDATIONS

2.1 It is recommended that Board consider, comment and approve the recommendations within the CEP service review report, together with comments from the Executive Management Team (EMT) meeting of February 2016.

3 REPORT

3.1 The Customer Excellence Panel (CEP) is the customer panel who proactively reviews and challenges our work to ensure the delivery of corporate goals and objectives; ensures that tenant and leaseholders are involved in our decision making processes; and that our strategic direction in service delivery reflects customer needs and aspirations. The CEP work to an agreed six stage process and deliver an annual programme of service reviews.

3.2 The CEP have completed four service reviews so far, focusing on Lettable Standard, Repair Appointments, Right First Time and Anti-social Behaviour with all recommendations being approved by the former Performance & Service Improvement Committee (PSIC).

3.3 This fifth service review focussed on New Tenancy Visits. A new tenancy visit is carried out by the relevant Housing Patch Manager and is the first agreed opportunity to meet tenants in their home. These visits are prioritised by any identified vulnerabilities the tenant may have and help Nottingham City Homes (NCH) to establish a relationship with the tenant; ensure that profiling information is accurate; reduce opportunity for tenancy fraud; identify any support issues; highlight local services and amenities; and re-inforce tenancy conditions to maximise tenancy sustainability.

3.4 The CEP service review commenced in Autumn 2015, with a specific brief to scrutinise New Tenancy Visits – Performance and Quality.
Specifically CEP wanted to consider:

- Reasons behind below target performance.
- Quality, objectives, rationale and outcomes from the NTVs.

CEP considered a wide range of information and carried out a range of activities to support this review – extensive evidence is available if required.

3.5 CEP completed their work on this service review in December 2015 and compiled a draft report highlighting 10 recommendations for improvement and raised 1 additional point for consideration. This report was then presented to the relevant service area lead for comments and is attached as Appendix 2.

3.6 The EMT was presented with the final draft of CEP’s report in February 2016 to note the finding of the service review and to offer comments and feedback to CEP. The report was support by EMT subject to Board approval. EMT noted that the recommendations and findings need to be considered in the wider ‘pre-tenancy’ work currently on-going to prevent some of the concerns highlighted within this CEP service review.

4 FINANCIAL, LEGAL AND RISK IMPLICATIONS

4.1 Financial Implications
In writing the service review report CEP considered the financial implications on the organisation against the potential benefits for customers and based their recommendations in line with these.

The recommendations are a ‘quick-fix’ solution that can be achieved through streamlining of existing procedures and clarified through new documentation and met by existing budgets.

4.2 Legal Implications
None applicable.

4.3 Risk Implications
The Corporate Plan identifies the following risk – ‘Failure to retain support and satisfaction of customers for the company’.

There are no inherent risks within the report itself. The CEP service review process provides wider compliance with our co-regulation requirements.

5 IMPLICATIONS FOR NOTTINGHAM CITY HOMES’ OBJECTIVES

5.1 CEP’s service review and report drives improvement through customer involvement in line with the corporate goal of “to be a first class housing organisation in the eyes of our tenants and leaseholders”.

6 EQUALITY AND DIVERSITY IMPLICATIONS
6.1 Has the equality impact of these proposals been assessed?

☐ Yes (EIA attached)
☒ No (this report does not contain proposals which require an EIA)

7 BACKGROUND MATERIAL AND PUBLISHED DOCUMENTS REFERRED TO IN COMPILING THIS REPORT


Contact officers:
Name: Ann Lynch
Address: Loxley House
Tel: 0115 7469274
E-mail: Ann.Lynch@nottinghamcityhomes.org.uk

Date: 23 March 2016
Nottingham City Homes

Customer Excellence Panel

New Tenancy Visits – Performance and Quality

REPORT

December 2015

Prepared by

Customer Excellence Panel
Content

1. Introduction

2. Methodology
   2.1 Overall view of New Tenancy Visits (NTV)
   2.2 Desktop research
   2.3 E&D considerations
   2.4 Real-life scenarios
   2.5 Focus Group
   2.6 Telephone survey

3. Findings

4. Recommendations

5. Additional Findings / Points for Consideration – outside of service review topic

6. Service Manager(s) report feedback
Introduction

The Customer Excellence Panel (CEP) is the Nottingham City Homes (NCH) scrutiny panel whose members are responsible for undertaking tenant-led service reviews of NCH services. All Panel members are volunteers who dedicate their spare time to aiding improvements of NCH services on behalf of the wider customer base.

CEP members considered a range of information including current housing issues, the landlord’s performance data and customer satisfaction results as part of the scoping process to identify the topic of their next service review.

This report provides an overview of the methods used to carry out the review as well as the findings and recommendations reached upon the conclusion of the service review tasks.

The wider chosen topic for this review is – New Tenancy Visits (NTVs) – Performance and Quality. The rationale for this service review was the under-performance of the NTVs against target and also showing a declining trend from the previous year. This extract from “NCH Annual Performance Report 2014-2015” provides detail:

<table>
<thead>
<tr>
<th>% of new tenancy visits completed where access was gained within 6 weeks of tenancy commencement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Result</td>
</tr>
<tr>
<td>--------</td>
</tr>
<tr>
<td>2014/15</td>
</tr>
</tbody>
</table>

Specifically, the scrutiny exercise considered the following:
- Reasons behind below target performance.
- Quality, objectives, rationale and outcomes from the NTVs.

2. Methodology

CEP members carried out a range of tasks as part of the evidence gathering to consider the service review question above. The following methods were chosen:

2.1 Overall understanding of the NTVs:
Specifically the rationale, desired outcomes and the logistics of NTVs. An overview was provided by a presentation by Will Morritt (Regional Manager), which covered the NCH approach to NTVs.

This was followed by CEP discussions on the presentation and a series of follow-up questions to Will, which were all answered thoroughly and promptly.
2.2 Desktop research:
Relevant documents were considered by CEP to gain an understanding of the NTV processes. Documents, such as the procedure, process map and associated documents including letters and the visit form were perused, as follows:

- Policy & procedure documents.
- Structural – process map.
- Benchmarking Data. No “official” benchmarking data available – however, through direct research some useful comparative information was established.
- In addition to the Annual Performance Report, further current data on performance and segmentation was supplied by the BID team and was also scrutinised.

2.3 Equality and Diversity (E&D) Considerations:
The Panel considered policy documentation in respect of E&D principles – user friendly language, literacy, translation options, pictorial guides, alternative provision / access to information etc. and their findings informed the recommendations made as part of this service review.

2.4 Real-life scenario field visits “shadowing”:
CEP was interested in obtaining the views from real-life NTVs. CEP members shadowed several HPMs to observe how they undertook the visits, right from preparation for the visits, the visit itself, through to the logging of information on return to the office. The observations and thoughts of CEP members were then logged.

This exercise provided some depth to the review, which is included within this report.

2.5 Focus Group:
Having considered the findings from the field visits, CEP wished to set up a small Focus Group with HPMs. This was undertaken, with questions led by CEP members to establish thoughts and ideas from front-line staff. A set of “loose” pre-set questions were used, mainly as discussion prompts. Whilst two members of CEP led the session, the minutes were shared with all CEP members and agreed.

2.6 Telephone survey:
Finally a short telephone questionnaire was used to try and establish some limited customer perception. This was undertaken by ACE Inspectors to establish views of longer-term tenants on their own NTVs in retrospect. This was short and therefore it could not be argued that the sample was 100% scientific or representative, nonetheless some useful triangulation of findings was the outcome.

The findings from the above informed the main recommendations found in this report.
3 Findings

Upon conclusion of the evidence gathering CEP members identified a number of findings that are summarised below:

- There are clearly difficulties in catching some tenants in for the visit – especially those that work. This is the key reason for underperformance. CEP accept that there is no easy answer to this issue, but there appears to be more success at getting tenants at home if contact is made by the HPM as close as possible to the visit and not relying on a date which was set arbitrarily at the original sign-up. CEP members could sense the HPM frustration at tenants not being in, despite personal contact having been made, sometimes that same day. CEP pondered on how tenants themselves might take the NTV more seriously and/or view it more positively.

- There was little difference in the performance of the different teams, with the exception of Bulwell, whose outturn was considerably below that of the other teams.

- Of note here is that current performance for 15/16 appears to have dipped since last year, which was already not achieving target. On further clarification CEP were informed that this was due to the incorporation of a Priority Tenancy Visits (PTV) 3 week visit target for tenants deemed to be vulnerable. Therefore the current performance is a combination of the 3 week visit target for vulnerable tenants and the 6 week visit target for all other tenants. Due to this change there is not currently an overall set target for 2015/16 – given that ¾ of this year has already progressed it does not seem to be acceptable to be without a set target.

- Whilst there was no “official” benchmarking data, it was apparent from the limited research done that there is wide variation in approach, both in terms of targets and also how “success” is recorded.

- The overall procedure itself is good and paperwork is adequate, although some of the standard letters look a little “tired”. The update of the standardised “one form” is noted as a very recent improvement, particularly the emphasis upon UC. It is not obvious though what checks are being made to ensure that the decoration points allocation is being used for the purpose set.

- The visits themselves are conducted to a high standard of professionalism and HPMs tailor their approach dependent upon the needs of the customer.

- The NTV is valued, particularly by tenants, but also HPMs who see it as “inclusive” and “useful” – however it could be more “efficient”, according to HPMs, particularly if more information is gathered earlier. Some vital tenant information (for example, next-of-kin) is still missing at the time of the NTV.

- It would appear that outstanding repairs is one of the key follow-ups – tenants can misunderstand the role of the HPM and can sometimes wait for the NTV before a repair is raised with NCH. This can set up a false expectation that the HPM can resolve everything whereas in reality they have to signpost and refer on to some extent.

- The issue over repairs to be done once tenants have moved in was raised by both HPMs and tenants. It is understood and accepted that allocations and lettings have challenging targets to work to. However, anecdotally at least, there is a sense that these are not always followed through and owned by the lettings/voids team. This matter may also give
out the wrong message to customers who are taking a tenancy when not all repairs are
done beforehand.
• In terms of E&D there are no significant issues – the approach being implicit within the
“Tenancy Visit Procedure” document, particularly around the issue of language.

4 Recommendations

CEP recommendations have been agreed by all Panel members that have been involved in the
service review. They are believed to be well reasoned and aim to deliver service
improvements as well as increase customer satisfaction without placing undue pressure on
existing budgets and resources.

The recommendations are as follows:

4.1 Best practice in terms of catching tenants at home is clearly by the HPM making contact
as near as possible to the actual date/time. This to be underlined to all TEMs.
4.2 Positive marketing around the NTVs – emphasising the positive aspects of the visit and
that references and materials relating to the NTV are as prominent as possible at sign-up.
4.3 EMT/Board considers with-holding the “Responsible Tenant Award” from tenants who
have not undertaken the NTV in order to emphasise the importance of the visit. If agreed, this is communicated widely through the usual channels.
4.4 A target of the NTVs overall performance is set with some urgency – This target should
be both aspirational and realistic and NCH should not set itself up to fail. A short-lived
benchmarking club with selected other organisations could help this be set
comparatively and fairly.
4.5 A review of standard NTV letters is undertaken and also the recording mechanism for
decoration points.
4.6 That more basic information is gathered at application and sign-up stage so that when
the NTV takes place the HPM is spending minimal time in filling in gaps in information.
4.7 That repairs to be done after sign-up are kept to an absolute minimum and also that
one officer, identified to the tenant, has overall accountability for making sure that
these are completed within the set timescales. All repairs issues should be
communicated to the HPM so that at the NTV they can provide clarity to the tenant,
with clear lines of communication for the tenant to contact if required.
4.8 Any issue for which NCH have a responsibility and which cannot be resolved at the time
of the NTV should be allocated a clear timescale for response, which the tenant is made
aware of.
4.9 Roles of HPM, Repairs staff etc. are made very clear at sign-up and underlined again at
the NTV.
4.10 That consideration of time to undertake the visit is taken. Particularly with the advent of
UC it may be that more time could be needed to cover this.
5 Additional Findings / Points for Consideration – outside of service review topic

The nature of the CEP-led service reviews requires that the topic under review needs to be manageable to achieve effective scrutiny and timescales, and as a result of this additional findings or points for consideration that fall outside of the service review question will be identified. The Panel feel that these should be captured within the overall report and given consideration by the Executive Management Team.

5.1 Referral onto other agencies appears not to be standardised. Can this be considered for clarification and a definitive list of agencies produced?

6 Service Manager(s) report feedback

Upon completion of a tenant-led review the NCH process allows for Service Managers whose service areas might be impacted upon by the recommendations to comment or provide feedback on the CEP report. The process states that CEP will then consider this feedback and will make a decision whether to amend any aspect of the report to reflect the additional learning.

Responses give reassurance to the Panel members that simple actions can be implemented to improve existing process.

The Panel members feel that whilst the proposed action by the Managers may lead to improvements, NCH should acknowledge that at the time of the review the findings identified warrant the recommendations made and that an action plan to address the concerns highlighted should be put in place with clearly defined timescales to drive forward service improvements.

Feedback was received from:
Will Morritt (Regional Manager, Tenancy & Estate Management). In addition an Action Plan relating to the recommendations has been drawn up.
CEP Service Review – Service Manager Response Report

1. Introduction

Service Manager(s) feedback

Upon completion of a tenant-led review the NCH process allows for Service Managers whose service areas might be impacted upon by the recommendations to comment or provide feedback on the CEP report. The process states that CEP will then consider this feedback and will make a decision whether to amend any aspect of the report to reflect the additional learning.

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2. Details of Response

Name of NCH officer: Will Morritt
Job title: Regional Manager, Tenancy & Estate Management

1. Your comments – CEP draft report

Section 3: Findings:
The audit report recognises the issue relating to tenants allowing access and difficulties HPMs have in gaining access. The report states that even when a HPM contacts a tenant on the morning of the visit does not guarantee access later the same day. We are working to create a text messaging system to allow auto generated texts be sent to each new tenant before the meeting and on the day.

The specific performance issue identified at Bulwell has been resolved and was a result of lower staff levels at the office.

The NTV appointments are now set by the HPMs directly rather than at sign up as it was recognised that the tenant has a number of other concerns at that time. Again once the appointment is agreed we aim to send automatic text messages reminding the tenant of the visit time and date.

Performance targets set with TEMs for new shorted targets for NVTs to tenants identified as vulnerable it will be reviewed again in April for following year.
It appears there is some confusion in relation to the use of decorating support provided to new tenants. It is the responsibility of letting team to set and provide the decoration equipment; this is managed through the process to prevent fraudulent abuse. The points are redeemed at specific outlets that only provide decorating equipment. It is not expected that all the decorating is done before a NTV.

Standard letters are being reviewed throughout the organisation to ensure correct logos and plain English are used.

Lettings confirm that all information received is input onto Northgate with in the first week, it is now mandatory to include equality information and household information before the tenancy can be confirmed on the system.

The voids team arrange for most repairs to be completed before the letting process, any outstanding repairs are recorded on a “Your New Letting Standard” sheet and a copy given to the tenant, a named lettings officer is recorded should the tenant wish to contact NCH. This form is saved and HPMs have now been instructed to refer to this form to ensure they are aware of any outstanding repairs. All repairs identified once the tenancy has begun would fall to the standard repair request through the CSC.

Section 4 :Recommendations

4.1 New texting service to be utilised by HPMs to remind tenants of the visit before and on the day of the visit.

4.2 The Lettings manager has arranged to discuss promotion of NTVs with all lettings staff to ensure tenants are made aware of need to attend this visit.

4.3 NTVs do not form part of the criteria for Responsible Tenant Rewards at present.

4.4 Performance has been set for the remaining quarter of this year and new targets to be agreed for 2016-17.

4.5 Standard letters are being reviewed throughout the organisation to ensure correct logos and plain English are used. Decoration points are managed and recorded through Northgate as part of the void process.

4.6 All relevant information is recorded and mandatory for the setting up of the tenancy on Northgate.

4.7 Lettings manager confirms that most repairs are completed before tenancy starts, outstanding repairs are kept to a minimum and are usually external works delayed by inclement weather. There is a “Your New Letting Standard” form available for HPMs to refer to; it is signed by lettings officer and tenant with details of any outstanding issues including repairs.

4.8 Lettings manager confirms there is a non-repair pre letting form signed by tenant and lettings officer.

4.9 The Lettings manager has arranged to discuss promotion of NTVs with all lettings staff to
ensure tenants are made aware of need to attend this visit and roles and responsibilities.

4.10 HPMs manage their own diary to ensure best use of their time, appointments are created to allow sufficient time for each visit but it is recognised this may be extended due to UC issues. TEMs will monitor and discuss with HPMs in their monthly 1-2-1 meetings.

Section 5: Additional Findings / Points for Consideration

It may have been useful for CEP to speak to lettings teams and refer to Your New Letting Standard as part of the review.

5.1 Support needs assessments are carried out and referrals made to Central Access Point (CAP) HPMs are subject to on-going training and advice in relation to new and existing support organisations.

I welcome this report and would like to thank CEP for their considerable time and effort working with our teams to identify the issues in this report.

2. Proposed action

As a result of issue identified in the report I propose to carry out the following actions

1 Configure automatic texting service with IT.
2 Lettings team reminded of NTV process to promote service and ensure prompt actions.
3 HPMs advised of Lettings Your New Letting Standard report for each new lettings.
4 Review standard letters to ensure fresh and use of plain English.
NOTTINGHAM CITY HOMES

REPORT OF DIRECTOR OF INVESTMENT AND BUSINESS SERVICES

GROUP VALUE FOR MONEY STRATEGY 2016-2019

1 SUMMARY

1.1 This report provides the Board with a draft Value for Money Strategy (Appendix 1) for the Nottingham City Homes (NCH) Group.

2 RECOMMENDATIONS

2.1 It is recommended that the Board comment on the draft NCH Value for Money Strategy 2016-2019 and delegate sign off to the Chair following inclusion of the Board’s comments.

3 REPORT

3.1 NCH’s Value for Money Strategy provides a clear and robust framework for value for money (VFM) across the NCH Group. As NCH diversifies its activities, with the creation of two subsidiary companies, our focus on VFM has an ever higher prominence.

3.2 ‘Providing great value for money’ is one of our values and is at the heart of our approach to service delivery and delivering our corporate ambition. Value for money across the NCH Group means regularly identifying what our customers need, and ensuring this can be delivered in the most cost effective, efficient and sustainable way for our communities. VFM is not about always achieving the lowest cost, the fastest delivery, the highest quality or the greatest satisfaction.

3.3 The Homes and Communities Agency (HCA) has value for money as one of the seven standards for registered providers. NCH’s Registered Provider subsidiary will have to demonstrate its approach to managing its resources in line with the HCA’s economic standard on VFM. This includes annually publishing a robust self-assessment that sets out in a way that is transparent and accessible to stakeholders how it is achieving VFM in delivering its purpose and objectives.

3.4 The strategy ensures the Group manages it financial affairs and activities in ways that drive and deliver value for money. Our approach maximises the potential of our Group structure, with shared and efficient services that provide value for money and support our aims.

3.5 This VFM strategy supports other Group strategies and consolidates the
activities in NCH core business plans which describe how we make best use of our resources to meet the requirements of our customers.

3.6 The strategic framework for the delivery of VFM includes:

3.6.1 Medium Term financial strategy
This models our forecasted income streams and anticipated changes to our cost structure arising from Corporate Plan activities including changes to meet the demands of universal credit and on-going pressures from welfare benefit reforms.

3.6.2 Budget strategy
Priority Based budgeting is a critical element of our VFM activities in delivering our annual service plans. There are no assumptions on costs or activities just because they were included in budgets in previous years. Robust challenge to budgets, vigorous financial management and budgetary controls exist to support the process.

3.6.3 Team plans and individual PDR objectives
Every team across NCH produces an annual plan - demonstrating how it will deliver against the Group’s goals and objectives and the resources required to do this. Plans must be affordable, realistic and achievable. The golden thread of VFM should run throughout the Group – from top to bottom with our strategic aims cascaded to team and individual plans. VFM needs to be made meaningful to all employees in terms of their day to day activity.

3.6.4 Organisational Development Strategy
Staffing is the Group’s biggest resource with nearly 1,000 people. It is only through the direction, motivation and enthusiasm of our employees can NCH deliver VFM for our customers and the communities we serve.

3.6.5 Continuous improvement activities
We have adopted continuous improvement tools and techniques to help drive out unnecessary cost and deliver efficiencies. We want our workforce to be productive, supported by smart business processes. Continuous improvement activities have a key role to play in engaging employees in improving services.

3.6.6 ICT Strategy
We will make the best use of our current and future technologies to achieve best value, continuous improvements and efficiency gains. We will explore ways in which technology can be used to improve existing services, deliver services in different ways, and deliver new services.

3.6.7 Procurement Strategy
Provides a framework to drive and deliver sustainable procurement solutions benefiting the Group’s financial position and to support the operational sections by providing the right product or service at the best quality and price.
3.6.8 **Asset Management Strategy**
Ensuring we provide VFM means targeting and prioritising investment in our assets in ways that help deliver our strategic objectives. This means being clear about the value and cost associated with our assets, and the expected outputs, so we can ensure we achieve the best return.

Our investment plans are driven by our aim to:
- Maximise the effect of the investment on the local economy.
- Help our customers deal with the ever growing threat of fuel poverty.
- Reduce carbon emissions.

3.6.9 **Customer insight**
We will use knowledge of our customers, their profile, service requirements, and opinions about our services to meet customer needs and expectations as we deliver service improvement. The more knowledge we have about our customers, the more we can deploy our resources to ensure the best VFM is achieved.

3.6.10 **SLA Reviews**
NCH and Nottingham City Council (NCC) work in partnership across many service areas and provide services to each other and to our customers through service level agreements. To ensure these services remain relevant and charges are competitive, service level agreements between NCC and NCH need to be reviewed regularly to ensure that value continues to be delivered for both organisations and the tenant and citizen requirements are being met.

3.6.11 **Social enterprise and partnerships**
We do not work in isolation and will continue to work with our partners and stakeholders to deliver services. This joint working can provide added value – and social value – to our work.

We recognise that supporting local Social Enterprises will make a significant contribution to tackling worklessness within Nottingham and that our procurement processes are a key factor in this.

3.6.12 **Social impact**
We will continue to develop ways to monitor and measure the value of the social impact of what we spend our money on, and commit resources to, whether that is people, communities or properties.

3.6.13 **Business Development**
Identifying and securing additional external funding will enable us to continue to invest in works and projects that have a positive impact on the lives of our customers.

3.6.14 **Income collection**
The efficient and effective collection of income is essential to the sustainability of NCH. We maximise our rental income through a comprehensive yet balanced approach to collecting rents. An action plan
for Universal Credit is underway and an external health check of our preparations completed.

3.6.15 **Tenant and Leaseholder involvement strategy**
Our relationship with our customers is vital in delivering services that are tailored, efficient and value for money. We have an established tenant involvement structure that supports our VFM culture. This includes our team of ACE Inspectors and our tenancy scrutiny panel – the Customer Excellence Panel who regularly test our services for quality and VFM.

3.7 In addition to the above there are a number of initiatives that will be delivered during the life of the strategy as outlined in VFM Strategy Action Plan.

4 **FINANCIAL, LEGAL AND RISK IMPLICATIONS**

4.1 Financial Implications

4.1.1 The VFM Strategy will continue to embed the culture of efficiency and VFM at NCH, to enable the best use of resources in achieving our corporate objectives.

4.2 Legal Implications

4.2.1 There are no legal implications arising from this report.

4.3 Risk Implications

4.3.1 Failure to deliver value for money, and in particular comply with the HCA value for money standard, will place our NCH Registered Provider subsidiary’s regulatory rating at risk. It also means that we are not using our resources effectively, and may not be focusing on our agreed priorities.

5 **IMPLICATIONS FOR NOTTINGHAM CITY HOMES’ OBJECTIVES**

5.1 This strategy supports the approach to the delivery of NCH objectives.

6 **EQUALITY AND DIVERSITY IMPLICATIONS**

6.1 Has the equality impact of these proposals been assessed?

No (this report does not contain proposals which require an EIA)

7 **BACKGROUND MATERIAL AND PUBLISHED DOCUMENTS REFERRED TO IN COMPILING THIS REPORT**

7.1 None
Contact officers: Name: Janet Glass, Head of Business Improvement and Development
Address: NCH Loxley House
Tel: 0115 7469170
E-mail: janet.glass@nottinghamcityhomes.org.uk

Date: 23 March 2016
Group Value for Money Strategy 2016-2019
Introduction

This strategy is written at an exciting time for Nottingham City Homes.

We are diversifying our activities, with the creation of two subsidiary companies; to extend the provision of social housing and market rent. Our subsidiaries Nottingham City Homes Enterprises Limited and Nottingham City Homes Registered Provider Limited together with Nottingham City Homes Limited form the Nottingham City Homes Group. For the purpose of this strategy, all references to NCH relate to the Group.

Nottingham City Homes Group aims to achieve excellence in every area of our work – aiming to be amongst the ‘top ten’ in all that we do.

Key to this ambition is making the best use of our resources to maximise value for our customers and stakeholders. Value for Money (VFM) across Nottingham City Homes Group (NCH) means regularly identifying what our customers need and ensuring this can be delivered in the most cost effective, efficient and sustainable way for our communities. VFM is not about always achieving the lowest cost, the fastest delivery, the highest quality or the greatest satisfaction.

This strategy ensures the Group manages its financial affairs and activities in ways that drive and deliver value for money. Our approach maximises the potential of our Group structure, with shared and efficient services that provide value for money and support our aims.

This strategy provides a clear and robust framework for value for money across the Group. Embedding a strong VFM culture means a common understanding on the value of every pound spent and on our contribution to the lives and homes of our customers and to the wider Nottingham economy.

Developing this strategy

This VFM strategy supports other Group strategies and consolidates the activities in NCH core business plans which describe how we make best use of our resources to meet the requirements of our customers.

We have consulted customers to help understand what they value. This informs our delivery priorities and standards throughout the complete range of our services, from expectations on the responsiveness of our staff through to the quality of the service delivered. We know our customers value investment in their homes and the local area as well as supporting individuals to improve their lives. Our customers also have a strong desire for NCH’s activities to support the local economy.

Our service planning and strategies drive the Group to deliver a VFM culture. The action plans from the Customer Insight strategy, ICT strategy, Procurement strategy, Asset Management strategy, Organisational Development strategy, Business Development strategy, Corporate Plan, Medium Term Financial Strategy, Risk Management strategy,
and continuous improvement initiatives ensure VFM is all encompassing within the NCH Group.

Effective scrutiny and performance management arrangements help to drive VFM. Our Customer Excellence Panel our Boards, and the NCC/NCH Partnership Forum all have a role to play in improving services and value for money.

Context

General policy direction from Government has altered the landscape in which value for money is pursued. Various policy initiatives around ‘localism’ and ‘cutting red tape’ serve to devolve greater autonomy to NCH, and increase the priority around local approaches to achieving VFM. This also permits greater customer involvement in establishing aspects of quality and value (as opposed to, for example, top down direction about delivery driven primarily by cost considerations alone).

Despite this scope for flexibility, continued pressure on public finances requires an absolute necessity to demonstrate VFM on an ongoing basis. This will continue to be an expectation of both customers and stakeholders. At times of economic pressure it is even more important to focus on delivering the best possible outcomes for our customers within the resources available. Planned rent reductions of 1% per year for four years, changes the financial landscape for social housing nationwide. Organisations have to ensure that their plans and ambitions remain achievable with less financial resources available. What was a viable project may become unviable with lower rent levels.

European Union directives also aim to ensure the most efficient use of public funds, and the EU Commission has sought to ensure that directives increase the efficiency of public expenditure. Delivering social value is at the heart of or approach - understanding the wider impact of our activities on the social, economic and environmental wellbeing of our communities. Social value objectives may include lifestyle improvements, educational and employment opportunities, health and wellbeing, and increased financial and digital inclusion. Wider strategic objectives in these areas, as set out by NCH in other strategies and plans, are part of the overall picture when assessing VFM.

VFM is a key priority for the Government and is one of the seven national standards which have been set by the Homes and Communities Agency (HCA). NCH's Registered Provider (RP) subsidiary company will have to demonstrate its approach to managing its resources in line with the HCA's economic standard on Value for Money.

The regulator has indicated they take a light touch approach to organisations with less than 1,000 stock. However, because of our commitment to grow over the foreseeable future it is likely that the NCH RP subsidiary may fall under a stricter regulatory regime operated by the HCA, set out below.

Registered providers must articulate and deliver a comprehensive and strategic approach to achieving VFM in meeting organisational objectives. The Board must maintain a robust assessment of the performance of all its assets and resources (including financial, social and environmental returns), taking into account the interests of and commitments to stakeholders, and be available in a way that is transparent and accessible.
This means managing resources **economically**, **efficiently** and **effectively** to provide quality services and homes and planning for and delivering on-going improvements in VFM.

To achieve VFM we need to ensure the optimum relationship of cost, inputs, outputs and outcomes as illustrated below:

![Value for Money Diagram](image)

**Regulators specific expectations**

Registered providers shall:

- have a robust approach to making decisions on the use of resources to deliver their objectives
- understand the return on assets, and have a strategy for optimising the future return on assets – including rigorous appraisal of all potential options for improving VFM
- have performance management and scrutiny functions which are effective at driving and delivering improved VFM performance
- understand the costs and outcomes of delivering specific services and which underlying factors influence these costs and how they do so.

In addition, Registered Providers shall demonstrate to stakeholders how they are meeting the VFM standard and as part of this, annually publish a robust self-assessment which sets out in a way that is transparent and accessible to stakeholders how they are achieving VFM in delivering their purpose and objectives.

The assessment shall:

- enable stakeholders to understand the return on assets measured against organisational objectives;
- set out the absolute and comparative costs of delivering specific services;
- evidence VFM gains that have and will be made and how they have been realised over time.
Local Context

NCH contributes directly to the housing objectives in the Nottingham Plan to 2020, the city’s Sustainable Communities Strategy (SCS). This sets out the key priorities for the city. Our work also contributes to meeting other SCS priorities such as improving the health of residents, reducing crime and anti-social behaviour, engaging residents, and improving neighbourhoods.

Public services in Nottingham will continue to face budget pressures over the life of this VFM Strategy. We will seek to minimise the negative impact of this on our customers and to meet the increasing demand on the resources available locally.

Following the Government’s July 2015 budget announcement and the recent Welfare Reform Bill the City Council has updated its Medium Term Financial Plan (MTFP) to reflect a number of significant changes which impact on the Housing Revenue Account (HRA) – most notably the requirement for Local Authorities to reduce rents annually by 1%. This change in rent policy has had a significant impact on the HRA 30 year Business Plan, which previously assumed an annual increase in rent of CPI+1%, as the rent reduction is required every year for the next 4 years (2016/17 to 2019/20).

NCH has worked closely with the City Council to identify the full effect on the HRA of the 1% rent reduction, ensuring it is reflected in both the MTFP and 30 year Business Plan and establish the savings required to keep it in balance. In summary, rather than seeing an average increase in fees of 1.9% to cover the cost of rising employee costs and inflation, NCH Ltd’s Management fee has been reduced by £0.5million (2.2%) and its Repairs Fee frozen.

Universal Credit began to be rolled out in Nottingham in February 2016. This is anticipated to have a significant future impact on the level of HRA rental income recovered as well as the resources required to collect it. The updated HRA MTFP is anticipated to include an increase in the bad debt provision from £2.5million to £3.5million to help mitigate the risk of falling rent collection levels. The actual impact of Universal Credit could well be much higher and so it remains a significant risk to HRA income levels and NCH’s respective HRA fees.

To address the budget gap the 2016/2017 Team Planning and Priority Based Budget process identified savings across service areas and Directorates as summarised below:

<table>
<thead>
<tr>
<th>DIRECTORATES</th>
<th>£'000</th>
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<tbody>
<tr>
<td>Property Services</td>
<td>1,708</td>
</tr>
<tr>
<td>Housing Services</td>
<td>731</td>
</tr>
<tr>
<td>Corporate Services</td>
<td>292</td>
</tr>
<tr>
<td>Central &amp; Company-wide items</td>
<td>135</td>
</tr>
<tr>
<td><strong>TOTAL BUDGET SAVINGS</strong></td>
<td><strong>2,866</strong></td>
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</tbody>
</table>
Vision

When we deliver VFM we achieve on many levels:

- we obtain greater customer satisfaction on our services, and the value tenants perceive for the rent paid
- we are in a position to generate additional resources to focus on new initiatives, be they new house building or further ‘investment to save’ opportunities
- employees are more engaged and motivated in seeking and achieving efficiencies when the link between delivering customer priorities and the reinvestment of savings is clear,
- working with partner organisations, we are able to improve our communities, attract further investment and generate a greater social return
- ensuring a sustainable financial future for the organisation.

Delivering the strategy

Responsibility for VFM lies with all employees across the NCH Group. The Executive Management Team will drive VFM and the Board(s) will require assurances that VFM is achieved. Managers across the Group will integrate VFM into the working culture of all employees.

Delivering VFM will be achieved by the separate and coordinated delivery of a range of strategies and policies across the Group. It is also about the characteristics, behaviours and processes of an organisation that collectively shape the organisational culture. VFM is a dynamic and enveloping feature of the workstreams that drive the Group’s plans and improvement activities.

Our Boards have overall responsibility for NCH. We will invest in the development of our Boards so we make the most of their skills, experience and knowledge to enable them to lead, scrutinise and challenge. We will provide the Boards with a timely VFM self-assessment that is transparent and robust, and demonstrates our understanding of the return on our assets. We will enable our Board to consider cost and performance information, to make judgments about VFM and assist decision making.

We will stress test our business plan against scenarios that impact on our viability.

NCH Corporate Plan

It is vital we manage our money more effectively than ever. The NCH Corporate Plan supports a 30 year financial model for the Housing Revenue Account Business Plan. We have made significant strides in identifying efficiencies and reducing our costs over recent years – including a reduction in our management fee of 22% since 2010.

To achieve the best outcomes for our tenants and leaseholders we are committed to making best use of our available resources – notably financial, Information Communication Technology (ICT), equipment and employee time. We aim to use our resources as
efficiently as possible, providing maximum value for money in the services we deliver. To enable this there needs to be a strong understanding across the company on the value of every pound spent.

These savings plans have been delivered with limited impact on customer services. We have made savings by modernising our repairs and maintenance and housing directorates, as well as significant reductions in corporate and support service spend. In particular responsive repairs and tenancy and estate management have undergone significant modernisation agendas. Through these efficiencies and savings we have also been able to help the city council invest more in improving homes and places where people want to live.

We will create an environment that allows NCH to thrive. We will market our services effectively, attract new business and develop our commercial expertise to complement our core business activity. We will recruit independent Board Members when necessary to ensure we have the appropriate specialist skills and experience as we seek to diversify and grow.

We will manage our resources effectively, exploring efficiencies through partnership working (such as East Midlands Shared Services), reduce waste and benchmark the costs of our services so we can secure value for money for our customers. Internal and external audit will make sure our systems are robust and well managed. We will seek external funding, both directly and through our tenants and residents groups, to bring investment to the city to further the objectives in the Corporate Plan.

Our commitment to deliver great value for money runs throughout our Corporate Plan and across all our activities. Our values reflect this passion:

<table>
<thead>
<tr>
<th>Our values:</th>
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<tbody>
<tr>
<td>• Passionate about Delivering outstanding services</td>
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<td>• Respect people – our colleagues, our customers, our communities</td>
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<tr>
<td>• Always looking for ways to improve</td>
</tr>
<tr>
<td>• Providing great value for money</td>
</tr>
<tr>
<td>• Effective team working with each other, our customers, and our partners</td>
</tr>
</tbody>
</table>

Our values define the way we work, set out who we are, and shape customer expectations. We will live our values by embedding them in everything we do.

**Medium term financial strategy**
The medium term financial strategy (MTFS) describes how we link the constraints of the HRA 30 year business plan with the financial demands on the organisation to deliver the Corporate Plan. Over recent years local authority budgets have come under increasing pressure to make significant year on year savings. In parallel to this has been the bedding in of the changes to the financial planning of social housing required by HRA self-financing.

The MTFS models our forecasted income streams and anticipated changes to our cost structure arising from Corporate Plan activities including changes to meet the demands of universal credit and on-going pressures from welfare benefit reforms.
Budget strategy
Priority Based Budgeting (PBB) is a critical element of our VFM activities in delivering our annual service plans.

PBB involves the preparation of operating budgets that are ranked based on priorities which contribute to our corporate objectives.

There are no assumptions that costs or activities are included in the budget just because they were in prior years i.e. we start afresh in each new planning period.

Budget Managers in consultation with their Directors identify service priorities and using PBB allocate budgets accordingly. Priority items include growth items, cost pressures and initiatives such as invest to save. Annual efficiency targets are set, aligned with the Group’s overall strategic and financial planning objectives. This involves robust challenge to budgets. Vigorous financial management and devolved budgetary controls exist to support the process.

Performance against budget is monitored at individual team level, with updated forecasted outcomes regularly reviewed. EMT, Audit Committee and Boards will be informed of variance to budgets and any changes to the forecasted financial results.

Team Plans
All teams are expected to produce an annual plan, showing how it will deliver against the goals and objectives in our Corporate Plan, and the resources required to do this. Plans must be affordable, realistic and achievable. The team planning process is delivered hand in glove with the PBB process.

Individual PDR objectives
Team plans form the basis of individual employee targets. There must be clear agreement and understanding between employee and manager on individual objectives. The “golden thread” of VFM should run through the Group – from top to bottom with our strategic aims cascaded through to team and individual plans. VFM needs to be made meaningful to all employees in terms of their day to day activity.

Organisational development strategy
The primary purpose of this is to harness our employee resources effectively to fulfil the ambitions of our Corporate Plan while promoting great working lives, enabling every colleague to reach their full potential.

Staffing is the Group’s biggest resource. We directly employ nearly 1,000 people across the Group.

It is only through the direction, motivation and enthusiasm of our employees can NCH deliver VFM for our customers and the communities we serve.

Continuous Improvement activities (including Lean reviews)
We recognise we need to be flexible, agile and adaptable to the ever changing environment, so we deliver greater value to our customers and stakeholders. We have
adopted continuous improvement tools and techniques to deliver efficiencies. Continuous improvement methodology links to our corporate goals through delivering services that add more value for our customers - whether through quicker processing, improved quality or delivering to customers' expectations.

Continuous improvement also delivers efficiencies in the way we provide services by removing unnecessary cost. Continuous improvement has a key role to play in engaging our employees in improving services – enabling every employee to play a role in improving services and the working environment. This in turn can lead to improved staff morale, where employees are empowered to make change.

NCH has introduced an extensive leadership development programme over the last few years, equipping the management team with the expertise to lead and deliver the Group’s journey to excellence.

**ICT strategy**
We will make best use of current and future technologies; to best support our customers and the wider community.

We will explore ways in which technology can be used to improve existing services, deliver these services in different ways, and deliver new services. We will promote the use of ‘self-serve’ to enable customers to perform many routine interactions at a time and place convenient to them, while not disadvantaging those customers who are not comfortable with the use of technology. At the same time, we will promote digital inclusion within our communities to enable customers to take advantage of the wider opportunities offered by technology.

NCH is developing mobile technology solutions to support housing staff and repairs operatives to spend as much time as possible working ‘in the field’ and to minimise unproductive ‘down time’. We will also develop wider mobile working options and in doing so aim to deliver ICT systems which are not device or location dependant and enable users to access their desktops through any internet connection using any device from any location.

NCH also looks for ways that VFM can be delivered through more effective, extensive or new use of existing ICT systems, and by terminating systems that are no longer of use to the Group. All ICT initiatives are subject to a thorough business case appraisal before commencement, ensuring that all potential economies have been identified.

This ICT strategy and service delivery will be driven by the following key principles:

- Making the most of NCH’s investment in information technology and management systems by putting quality, value, and accountability first
- Delivering excellent customer focused services
- Ensuring that ICT developments are delivered with the customer in mind
- Exploiting new technologies to achieve best value, continuous improvements and efficiency gains
- Embracing new developments and technologies to provide greater efficiencies, increased access to services and new ways of working
- Continuing to provide cost effective and efficient services that NCH’s customers require, e.g. more for less
- Ensuring the right services are always available to NCH’s customers, and by the means that suits them
- Ensuring that the ICT systems in use by NCH are available for use whenever required (24/7)
- Investing in NCH staff to ensure they have the necessary ICT skills, along with access to the appropriate ICT systems and services
- Maintaining appropriate governance of information held on NCH systems, ensuring access is used for proper purposes and secure from unauthorised access
- Providing better decision making support systems (management and performance information) throughout NCH
- Further developing robust information systems, and ways in which to access them
- Developing, improving and modernising NCH’s core business systems by better managing return on investment (ROI).

NCH aims to enable our digitally excluded customers to benefit from technology. Our vision is to increase the number of our customers who have access to the internet and the confidence and skills to use it effectively, thereby becoming ‘digitally included’. We anticipate that this will benefit our customers by:

- Enabling them to manage universal benefits and other interactions with Government on-line
- Increasing employment and education opportunities
- Reducing social isolation
- Enabling tenants to save on utilities and other bills

We anticipate that this will benefit NCH by:

- Enabling more cost effective communication with tenants
- Reducing postage and printing costs
- Improving interaction with tenants, including consultation and involvement
- Enabling "channel shift" in the way we interact with tenants
- Allowing the development of self-service facilities using new technologies.

Procurement strategy
NCH recognises the importance of the financial opportunities and the risks placed on procuring goods, works and services. This strategy will ensure that the goods, works and services purchased offer Value for Money (VFM) and support the company values. All procurement shall follow a consistent, transparent and auditable process.

Capital projects will be procured in the name of Nottingham City Council (NCC) and NCH and clear parameters for the procurement of these contracts shall be agreed upon. The procurement strategy provides a framework to drive and deliver sustainable procurement solutions benefiting the Group’s financial position and to support the operational sections by providing the right product or service at the best quality and price.

Planning for future operational activity is vital to making this strategy work. All stages of the procurement cycle shall be in accordance with UK and European legal requirements and the Group’s Standing Orders and associated policies.

Group procurement as set out in the strategy shall:
• Contribute to the delivery of NCH’s objectives and promote the Group’s values and policies
• Support and enable the delivery of VFM and improvements in service delivery across the Group
• Contribute towards the delivery of the budget and medium term financial plan
• Ensure compliance with legislation as well as the Group’s rules and regulations
• Be planned and undertaken in a structured, controlled and co-ordinated way
• Establish and develop collaborative opportunities and partnerships as well as new and more effective ways of working
• Utilise and exploit technology to target improvements in VFM, notably efficiency.

The strategy relates to all services provided by NCH, either directly or through other bodies.

The NCH Procurement Team will work with the Tenant Involvement Team to continue to develop the involvement of customers within procurement processes, ensuring that any involvement adds value to the process by giving consideration to supplies most affecting customers. The involvement of customers in procurement therefore shall focus on customer care and delivery to ensure that this is achieved.

The Tenant Academy will be utilised to provide training to customers prior to any involvement in the procurement process. We will work with tenants and leaseholders involved in procurement to ensure their experience and involvement e.g. evaluation methods used to select suppliers, is fed back to a wider customer audience through the appropriate channels. This will improve clarity and transparency of procurement decisions to those tenants and leaseholders that represent the customers of NCH.

**Asset Management strategy**

Over the next five years NCH’s Asset Management Team will deliver a quarter of a billion pounds programme of investment to the 26,500 council homes owned by NCC. This equates to a programme of over £1 million per week.

The scale of this investment means that we can really make a difference in creating homes and places where people want to live. It is crucial to Nottingham that this investment is made in line with our customers’ priorities, the NCH corporate plan and NCC key drivers, to the benefit of the wider community and to ensure we optimise the return on our assets.

Central to this strategy is the concept of ‘NCH Dynamic Asset Management’, based on a continual cycle of ‘Diagnose, Plan, Invest, Learn’. This model ensures that investment decisions are informed by all contributing factors, including evidence of our wider social, economic and environmental impact, and that the asset management of the housing stock remains ‘dynamic’. The strategy is complementary to and builds on the long-term priorities and plans set out in the ‘NCC Housing Revenue Account Business Plan (HRABP) 2012-2042’.

The investment plans are based around the three HRABP investment priorities of:
• meeting and maintaining the Nottingham Homes Standard
• additional tenant priorities
• decommissioning, regeneration and new build.

Complementing these priorities are the key drivers of:
• maximising the effect of the investment on the local economy
• helping our customers deal with the ever growing threat of fuel poverty
• reducing carbon emissions.

Customer Insight
NCH will use our approach to customer insight to help deliver VFM. More detail on our approach to customer insight is set out in our Customer Insight Strategy. This outlines how we use knowledge about our customers, their profile, service requirements and opinions about our services, to meet customer needs and expectations as we deliver service improvement.

Customer insight is designed to achieve the following outcomes:
• Better services (with increased satisfaction of customers, with needs met first time, thus reducing avoidable contact and duplicated costs)
• Faster and improved decision making
• Help customers respond to the challenges they face
• Using our resources most effectively to have the biggest impact
• Providing inclusive, sensitive and tailored customer services that ensure equality of access

These are all critical contributors to delivering VFM.

Customer focussed services that reflect the diversity of customer needs, will provide greater VFM than a uniform service provided to all. The more knowledge we have about our customers, the more we can deploy that knowledge to ensure the best VFM is delivered.

Customer insight outputs and information, in terms of our customer profile, service user patterns CRM and customer satisfaction opinion monitoring, will all be available to help drive VFM decision making across NCH.

SLA reviews
NCC delivers significant support services on our behalf and for our customers. To ensure these services remain relevant and charges are competitive the service level agreements between NCC and NCH need to be reviewed regularly. Our approach is one of constructive challenge, with the base premise that the strong relationship between NCC and NCH, existing partnership and governance arrangements, and the alignment of values and citizen/customer focus enables resolution of any problems with service levels and related charges.

Social Enterprises and Partnership Working
Social Enterprises are businesses that exist primarily for a social or environmental purpose. They use business to tackle social problems, improve people’s life chances and protect the environment. They create shared wealth and give people a stake in the community.

Social Enterprise is a growing sector with more than 68,000 social enterprises in the UK employing almost one million people. NCH recognises that supporting local Social Enterprises will make a significant contribution to tackling worklessness within Nottingham and that the procurement process is a key factor by which that is achieved.
NCH will work with responsible officers to identify key procurement opportunities that could be delivered by Social Enterprises and where appropriate shall target the inclusion of at least one local SE on the list of suppliers invited to submit tenders, or quotes.

NCH will work with local Social Enterprises to ensure that they have the capacity and expertise to tender for work, enabling them to be more competitive in open competition. NCH shall also work in partnership with NCC through:

- Active participation in NCC’s Procurement Support Body (PSB) which promotes and proactively encourages local procurement in conjunction with local business groups
- Providing information on future NCH procurement for inclusion in NCC’s procurement publications and promotions
- Attending NCC led ‘Meet the Buyer’ events.

NCH will maximise partnership working and collaboration where it is to the benefit of the Group and/or its customers, using the following principles:

- NCH shall work with NCC Corporate Procurement Team to share best practice and identify areas where there is potential to join together for improved cost effectiveness, increase in capacity and ultimately better quality services
- All opportunities for services to be procured from NCC (and vice versa) shall be explored and NCH shall continue to work closely with NCC on their commercial agenda and strategy
- Frameworks shall be used in a way that ensures they do not hinder access to procurement opportunities for small firms and or reduce opportunities for increased local spend
- Tactical service-delivery partnerships or partnering arrangements shall be entered into on a time-limited basis to fulfil a specific project or series of projects where NCH alone does not have the capacity or expertise to deliver
- NCH shall distinguish between partnerships that deliver services and those that act as co-ordinating bodies that don’t get involved in service delivery
- NCH shall collaborate with Efficiency East Midlands members to increase capacity for effective procurement by sharing experience, knowledge and expertise.

**Social Impact assessments**

Under The Public Services (Social Value) Act 2012, for the first time, all public bodies are required to consider how the services they commission and procure might improve the economic, social and environmental well-being of the area. Specifically the Act requires consideration, in relation to what is proposed to be procured, at the pre-procurement stage. Social Value should be integrated within the following stages of the procurement cycle:

- Identification of need
- Establishment of the procurement method and approach
- Tender evaluation
- Contract management.

In order to assess the risks associated with products, services and works procured; an understanding of how procurement has an effect on environmental, social impacts and the communities is required. Wherever possible, consideration shall be given to carrying out procurement in such a way as to maximise social value and benefits. Where appropriate
this will include considering packaging of contracts, advertising of contract opportunities locally, targeted recruitment, training and specific community benefits.

We will continue to develop ways to monitor and measure the value of the social impact of what we spend money on and commit resources to, whether that is people, communities or properties.

**Business Development strategy**
As a result of the structure and culture of our Group and our relationship with our customers and NCC, we are uniquely placed to generate additional value for our existing and future customers.

Our business development activity will not detract from our core aims and approval for all new business opportunities will only be granted after receiving a business case detailing any investment required, expected returns both financial and social, and how any risks of the venture will be mitigated.

Being flexible in the ways we work and alert to opportunities to develop our business will demonstrate that we are a dynamic and forward looking organisation and that we are ambitious for NCH.

Identifying and securing additional external funding will enable us to continue to invest in works and projects that have a positive impact on the lives of our customers. Our impact study on the wider benefits of Secure Warm and Modern evidenced how improving the council’s housing can make people feel more secure in their home, reduce fuel poverty, increase personal wellbeing, create jobs, and generate more investment and spending in the local economy.

**Income Collection**
The efficient and effective collection of income is essential to the sustainability of the HRA. Our rents collection team maximise our rental income through a comprehensive yet balanced approach to collecting rent from tenants.

Financial inclusion support is used to provide tenants with the access to any financial assistance they may be entitled to along with delivering money management and budgeting skills. Enforcement measures are used in dealing with persistent debtors, taking legal action when all other attempts to address the debt have failed.

With the introduction of Universal Credit (UC), and the resulting withdrawal of the direct payment of housing benefit to landlords by the DWP, the risk to rent collection increases significantly. An action plan for UC introduction is underway and an external health check of our preparedness has been completed. Trusted partner status with the DWP will be sought for our Rents Collection team, to assist us and support our tenants with access to timely and accurate UC payments.

We will introduce a Rent First culture for both customers and employees. Targeting publicity campaigns to customers to prioritise their rent payments, and making rent arrears every employee’s business across NCH.
Resources

This strategy will be delivered within existing resources. Delivering VFM as a general principle should not require additional resource but be self-funding. In some instances there may be a need to invest to save, or for an increase in quality or service level that adds to the cost. For VFM to be obtained the benefits achieved either financially or through the social impact must outweigh the additional resources committed.

The resources of NCH Ltd are funded by two main sources, the fee received from NCC to deliver housing and property services and the receipts from NCH’s commercial/pseudo-commercial activities.

The fee received from NCC is obtained indirectly from the rents tenants pay for their accommodation and the services they receive. Therefore, it is critical to not only ensure the VFM of our services, but also to demonstrate this to customers and to be accountable to them.

Monitoring and reviewing the strategy

NCH collect, analyse and report on a range of services across the whole Group. This work is the foundation that shapes future service developments and improvements.

We use Covalent to record and report on our VFM and other activities. This helps embed a performance management culture across the company based on transparency and accountability and the delivery of continuous improvement across all our services.

In addition to reporting performance to teams, scrutiny by EMT the Boards and the Customer Excellence Panel continually monitor and challenge performance and the delivery of VFM. We have developed an action plan detailing the key actions to be completed to help deliver this strategy (attached as Appendix 1).

To assist this NCH will:
- Work with customers to agree performance standards - and how to monitor them
- Communicate performance information to employees, customers, partners and others in a clear, concise and timely manner
- Make sure our performance management framework links every member of staff’s work to team and service area performance - to the Group’s overall strategies. This is the ‘golden thread’
- Hold all employees accountable for delivering performance improvement
- Focus on improving performance in areas that are most important to our key stakeholders

The benchmarking of our performance is a critical element in comparing our activities with the provision of similar services across the country. NCH may be able to demonstrate year-on-year VFM improvements, but it is important to compare our performance with the best as we continually push to achieve our objective to be a top performer across all our business activities.
An annual VFM statement and annual performance review will summarise the Group’s performance each year and highlight future improvement activity to drive performance towards further VFM.

This strategy will be updated in line with changes to the Corporate Plan and other Group strategies.

As NCH Ltd. celebrates its 10 year anniversary, Appendix 2 demonstrates the achievements of the ALMO since its inception.
### Appendix 1 Strategy Action Plan

#### Value for Money Strategy – Key Actions

NCH’s Corporate Plan and our agreed strategies ensure the golden thread of VFM is included within action plans, team plans and individual objectives throughout the Group. In addition there are initiatives that reinforce the VFM backbone of the organisation. These are:

<table>
<thead>
<tr>
<th>Action</th>
<th>Outcome</th>
<th>Responsible</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Produce annual self-assessment statement of VFM performance</td>
<td>Compliance with regulatory framework. VFM assurance provided to Board.</td>
<td>Director of Investment and Business Services</td>
<td></td>
</tr>
<tr>
<td>Stress test our business plan with scenarios that impact upon our viability</td>
<td>Compliance with regulatory framework. VFM assurance provided to Board.</td>
<td>Board</td>
<td></td>
</tr>
<tr>
<td>Deliver required improvements from HouseMark benchmarking report</td>
<td>Tackles low performing/high cost activities improving VFM of overall services</td>
<td>Service lead</td>
<td>Annual</td>
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<tr>
<td>Implement CRM</td>
<td>Improved customer service and streamlined workflow improving organisational efficiency and releasing officer time.</td>
<td>Project team</td>
<td></td>
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<tr>
<td>Implement DLO review outcomes</td>
<td>Improved customer service and right first time repairs.</td>
<td>Director of Repairs and Maintenance</td>
<td></td>
</tr>
<tr>
<td>Deliver Management Review</td>
<td>Refocused management cohort to lead and deliver the future needs of the organisation with embedded emphasis on greater commercial activity.</td>
<td>EMT</td>
<td></td>
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<tr>
<td>Deliver new business growth objectives</td>
<td>Generates increasing financial return to enable the delivery of greater capacity for corporate and NCC objectives.</td>
<td>Service lead</td>
<td>As planned</td>
</tr>
<tr>
<td>Deliver VFM, commercialism and cost awareness training</td>
<td>An embedded culture of VFM across the organisation.</td>
<td>Learning and Development</td>
<td></td>
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<tr>
<td>Deliver Digital Inclusion Strategy</td>
<td>Customers able to manage universal benefits on line and save on utilities and other bills. Increasing employment and education opportunities for customers.</td>
<td>Assistant Director, ICT</td>
<td></td>
</tr>
<tr>
<td>Deliver priority based budgeting and team planning</td>
<td>Ensures team outcomes are in line with corporate priorities and within the financial resources available.</td>
<td>Service lead</td>
<td>Annually as planned</td>
</tr>
<tr>
<td>Universal credit readiness planning</td>
<td>Maximises rental income potential following the removal of direct payments to landlords.</td>
<td>Assistant Director, Housing Operations</td>
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<tr>
<td>Strategy reviews and updates following new NCH Corporate Plan</td>
<td>Aligns NCH strategies with the corporate plan and ensures the VFM content is a golden thread throughout.</td>
<td>Service lead</td>
<td></td>
</tr>
<tr>
<td>Mobile working readiness</td>
<td>An enabled workforce able to deliver customer services and administration functions in a timely, cost effective and location independent manner.</td>
<td>Project team</td>
<td>April 2016</td>
</tr>
</tbody>
</table>

Return to agenda
NEW GOVERNMENT PROPOSALS AND EXTERNAL POLICY DEVELOPMENTS
WITH AN IMPACT ON NOTTINGHAM CITY HOMES

1 SUMMARY

1.1 This report provides an update on key housing policy announcements made since the start of 2016. This report continues a series of similar updates provided to the former Policy and New Business Committee. It is the intention to widen topics covered in future to broader policy areas that may impact on Nottingham City Homes (NCH).

2 RECOMMENDATIONS

2.1 It is recommended that the Board note the update.

3 REPORT

3.1 KEY GOVERNMENT ANNOUNCEMENTS

3.1.1 Housing and Planning Bill 2015-16

3.1.1.1 The Housing and Planning Bill commenced its Parliamentary progress in the House of Commons in the autumn and is now being scrutinised by the House of Lords. The Bill has its origins in the Conservative General Election manifesto. Proposals will have a significant impact on social housing in general and council owned housing in particular, if fully enacted as put before Parliament by the Government. The content of the Bill has been the subject of separate briefing notes for Board members and assessments of the implications.

3.1.1.2 Concerns about the Bill have been expressed by NCH tenants, and in response to those concerns the Chair of the Board wrote to selected members of the House of Lords in February. This correspondence resulted in a number of points being made in the House of Lords that quoted the views of NCH tenants.

3.1.1.3 Measures to introduce a mandatory pay to stay scheme for local authorities have been included in the Bill. A consultation exercise pay to stay: fairer rents in social housing was conducted in October and November 2015, to which NCH responded. The Government has confirmed that a taper will be applied above the minimum income thresholds and that households in receipt of Housing Benefit will be exempt from paying higher rents. The Government’s aim is to implement the mandatory pay to stay scheme from April 2017.
3.1.1.4 The Bill is expected to conclude its stages in Parliament during April 2016.

3.1.2 2016 Budget

3.1.2.1 The Chancellor of the Exchequer presented his Budget to Parliament on Wednesday 16 March 2016.

Commentators indicated that they felt the Budget held limited content focussed on housing sector issues. However, a number of spending announcements were made that will be of interest. These include:

- An allocation of £2bn to the Local Growth fund to help unlock large housing sites.
- £115m to help reduce rough sleeping via low cost ‘second stage’ accommodation for those leaving hostel accommodation or domestic violence refuges.
- A starter homes land fund of £1.2bn available to local authorities to help bring forward brownfield land for starter homes.
- The 3% increase in Stamp Duty on additional homes and ‘buy to let’ will be extended to ‘significant investors’ (institutional or corporate purchasers).

The budget also announced ‘Lifetime ISAs’ a savings product for those under 40 year of age that the government would contribute 25% to. Many commentators noted that this was probably designed to help those seeking to purchase a home find a route into home ownership through a help to save.

3.1.2.2 A briefing from the NFA on the Budget is attached as Appendix 1.

3.1.2.3 There were devolution announcements for a number of areas, but not the North Midlands.

3.1.3 Review of the Homes and Communities Agency (HCA)

3.1.3.1 The Housing Minister announced he would commence a review of the HCA. This is to consider the continuing need for the organisation, whose status is that of a non-departmental public body. Scope of the review will include:

- How the HCA’s functions contribute to government objectives.
- Whether all of the functions the HCA has are still required.
- What are the best future delivery options.
- The HCA’s capacity for efficiency and effectiveness.

3.1.3.2 Colleagues at Nottingham City Council, who have regular contact with the HCA, have participated in dialogue with the CLG’s review team about this review in order to feedback views.

3.1.3.3 Implications for NCH:
The HCA is a key regulatory body, with particular reference to Registered Providers (RPs). As a consequence NCH’s development of an RP subsidiary will need to take into account any relevant changes that flow from the review. The HCA also manages certain social housing data returns that are of relevance to NCH and Nottingham City Council. Any changes in those may need to be considered if necessary. In addition, certain funding streams for housing provision and regeneration have been sourced via the HCA, and as a result NCH and NCC will wish to respond appropriately to any changes that flow from this review.

3.1.4 Housing estate regeneration proposals

3.1.4.1 In January the Prime Minister David Cameron announced proposals to regenerate housing estates that “are entrenching poverty in Britain”. The article portrays a picture of problematic post war ‘mass housing’ estates that need to be “transformed” through a mixture of redesign and demolition, and the replacement of social housing with private housing.

3.1.4.2 The accompanying announcement indicated the creation of an Advisory Panel, Chaired by Lord Heseltine, and a loan fund of £140m to help identify 100 estates and to help pump prime the housing and re-construction costs. Nottingham North MP Graham Allen is a member of the panel.

3.1.4.3 Implications for NCH:

The initiative has been criticised (by the Association of Retained Council Housing for example) for being London focussed in its analysis, questioning whether land values outside the capital will permit the necessary funding to be released to carry out transformational work. Other concerns have been expressed that the proposal is designed to release high value land and is not primarily intended to provide replacement social housing.

However, NCH and the city council will monitor the initiative to see if there are any opportunities that may be available to Nottingham.

3.1.5 Funds to tackle rogue landlords

The government has announced further funding for initiatives to tackle rogue landlords, and further to earlier success in accessing such funds, Nottingham City Council was recently awarded a further £151,000 for work in this area. This was one of the larger awards to a local authority in that round of funding. The funding stream is to help councils inspect property, carry out enforcement work and if necessary demolish prohibited buildings (sheds being used as accommodation, for example).

3.1.6 REMOURBAN EU funding - European Smart Cities project, Sneinton initiative

3.1.6.1 NCH is taking an active role in this initiative, funded with £5m of European Union funding. Sneinton has been identified as one of three demonstration areas in Europe designed to develop a model to show how sustainability can
be integrated into the regeneration of our towns and cities.

A number of organisations across the city are working together to deliver this project including Nottingham Trent University, The City Council, and Nottingham Energy Partnership as well as private sector partners.

The funding has been secured to improve the energy performance of homes, to establish new low-carbon transport and to implement smart technologies in Sneinton. During 2016 and 2017 “a variety schemes will be delivered to help citizens of Sneinton to be warmer and healthier, to reduce their energy bills, and to reduce their carbon emissions”.

This project will include treating over 400 NCH and private houses in the Windmill Lane area with energy saving measures to reduce energy bills, as well as extending the district heating network to 94 homes and piloting the concept of low temperature community heating, which could allow Nottingham to roll out its low carbon heat from waste to many more domestic properties in the future.


3.1.7 Consultation on a review of the Feed in Tariff scheme

NCH responded to the consultation on the Feed in Tariff (FIT) review, the results of which were announced on 17th December 2015. Domestic Solar PV was expected to fall to 1.63p but in the event fell only to 4.39p following an industry wide campaign. However there is now a published digression whereby FIT rates reduce each quarter, and additionally a cap system in place whereby a budget is allocated each quarter, and once that is spent, any further installs will receive a lower FIT rate, it appears without any prior notice. The capital programme includes an allocation for PV installations. The changes reduce our ability to plan long term projects based on subsidy, so we need to now consider whether PV can be installed without subsidy.

3.2 UPDATES ON ITEMS PREVIOUSLY CONSIDERED

3.2.1 Universal Credit

3.2.1.1 The roll out of Universal Credit (UC) was extended to Jobcentre Plus offices in Nottingham in February. All jobseekers aged 18-60 who are single, have no children and are making a new claim will receive UC, which brings together six existing in work and out of work benefits for people of working age. NCH staff are aware of the impact of these changes on those who live in the homes we manage.

3.2.2 Lyons Report – Update Publication
3.2.2.1 The Lyons Commission review team published its main report on increasing the supply of housing in 2014. Following the new Government’s announcement of a target to build one million new homes by 2020, the review team reconvened to consider if current policy initiatives were enough to reach that target, and if other measures should be considered. In February 2016 the team published a short follow up report on this issue.

3.2.2.2 The team recommended that Government should:

- Broaden its strategy across tenures.
- Take a more ambitious approach to commissioning homes directly.
- Retain public subsidy directed at starter homes in perpetuity so that future generations can benefit.
- Acknowledge and support the role that local councils and housing association can play.
- Ensure that government champions design and environmental standards.


3.2.3 Welfare Reform and Work Act 2016

The Welfare Reform and Work Act 2016 received Royal Assent in March. The overall intention of the Act is to support the Government's commitments to increase employment, slow the growth of the welfare budget and support the policy of ensuring that the welfare system incentivises work. It is also the piece of legislation that has been used to require a 1% reduction in social housing rents.

Detailed matters to do with specifying what is ‘rent’ and what is a ‘service charge’ have been published via Statutory Instrument.

3.2.3.1 Implications for NCH:

There will be various changes to certain social security benefits as detailed in the 2015 Budget. This will impact on any households with members in receipt of those benefits, in homes managed by NCH. The 1% rent reduction will have a significant impact on the whole social housing sector, and the consequences have been drawn to Board member’s attention in other documents.

3.3 RECENTLY PUBLISHED REPORTS OF INTEREST

3.3.1 ‘Bedroom Tax’ Evaluation

3.3.1.1 The Government has published the report it commissioned on the ‘Evaluation of the Removal of the Spare Room Subsidy’ that was promised before the 2015 General Election. The report is a detailed assessment of what is more commonly known as the ‘bedroom tax’. It concludes that the change was not
easy for many tenants to absorb with some using a variety of strategies to help pay their rent (using savings, borrowing from friends or relatives, or accruing other debt). It also noted that there is a lack of suitable smaller properties in the social sector for people to move into to mitigate the impact.


3.3.2 English Housing Survey 2014/15

3.3.2.1 The latest English Housing Survey has been published. This is the main survey of housing in England commissioned by the Government via the Office of National Statistics. The report provides information on households, tenure (owner occupation and the social and private rented sectors) and the demographic and economic characteristics of households. Rents and Housing Benefit, buying expectations, overcrowding and under-occupation, and well-being are also examined. The report also provides data on housing stock in England including age, size, type of home and energy efficiency.

Headlines from the survey include:
- The number of social housing households under-occupying their homes has fallen to its lowest figure since 1995/96.
- Proportion of Social Rented homes classed as overcrowded has fallen from 7.3% to 6.2% in three years.
- Home ownership is at its lowest level since 1984 at 63% of all English households. The peak was 71% in 2003.
- The number of single people under the age of 35 with no dependent children on waiting lists for social housing has fallen by 17%, from 110,000 in 2010 to 91,000.


3.3.3 Savills Research: Spotlight Rental Britain

3.3.3.1 This report predicts continuing increase in demand for rental property despite Government initiatives to boost owner occupation. In an assessment of the rental market across the UK, the report includes analysis of regional trends, and identifies Nottingham as among the 29 most attractive cities for investment in the rental market.

3.3.3.3 The report is available to download at: http://pdf.euro.savills.co.uk/uk/residential---other/spotlight-rental-britain-february-2016.pdf

3.3.4 The Need for Stable Renting in England
3.3.4.1 Shelter has produced a report highlighting problems associated with the unstable nature of the private rental market in England. The report highlights the levels of instability in this tenure, associated with short term tenancies, and the wider impacts this can have on tenants and communities. The report recommends changes in the law to help create a more stable, secure private rented housing option.

3.3.4.2 The report is available to download at: [http://england.shelter.org.uk/data/assets/pdf_file/0010/1236484/The_need_for_stability2.pdf](http://england.shelter.org.uk/data/assets/pdf_file/0010/1236484/The_need_for_stability2.pdf)

3.3.5 National Housing Federation report: Mergers, Group Structures and Partnerships - A voluntary code for housing associations

NCH will establish a group structure during 2016, including a Registered Provider subsidiary. The Code is intended to support boards in their stewardship role; in applying sound principles in setting out their business purpose and in their evaluation of the options that optimise delivery for beneficiaries in the long term. It aims to establish a set of core principles, and seeks to provide a baseline for what good process and conduct looks like.

3.3.5.1 The Code does not prescribe processes nor does it seek to influence outcomes. Its focus is on conduct, informed judgements, transparency and accountability.

3.3.5.2 The report is available to download at: [http://s3-eu-west-1.amazonaws.com/pub.housing.org.uk/Mergers_Group_Structures_and_Partnerships_Code.pdf](http://s3-eu-west-1.amazonaws.com/pub.housing.org.uk/Mergers_Group_Structures_and_Partnerships_Code.pdf)

3.3.6 Announcement of EU referendum

The United Kingdom European Union membership referendum, also known as the EU referendum, is scheduled to take place in the United Kingdom and Gibraltar on 23 June 2016. Some house builders have warned that if the UK leaves the EU it could lead to a shortage of skilled construction labour, limit investment in new house building and exacerbate the UK's housing shortage. The industry relies heavily on migrant workers to fill both skilled and non-skilled job roles, and always has done. A reduction in the availability of workers in these jobs would require employers to adapt in various ways. For example, it could lead to wage rises or the need for investment to introduce more mechanisation. Most migrants from the European Union come to the United Kingdom to work, boosting the workforce by around 0.5% a year in 2015. This supports the economy’s ability to grow without pushing up wage growth and inflation, keeping interest rates lower for longer.

3.3.7 Compulsory microchipping for dogs

From 6 April 2016, it is a legal requirement that all dog keepers will be required to have their dogs aged over 8 weeks microchipped, or face a fine of £500. The Microchipping of Dogs (England) Regulations 2014 will be enforced by local authorities, police constables, community support officers and any other person which the Secretary of State may authorise to act as an enforcer of the regulations.
3.4 CONSULTATIONS

3.4.1 NCC will be starting work on a review of their housing strategy due Autumn 2016. NCH will have an important input and there are clear links with the work being done on reviewing the HRA Business Plan.

3.4.2 There are no relevant open consultations at the time this report was compiled.

4 FINANCIAL, LEGAL AND RISK IMPLICATIONS

4.1 Financial Implications

4.1.1 None.

4.2 Legal Implications

4.2.1 None.

4.3 Risk Implications

4.3.1 None.

5 IMPLICATIONS FOR NOTTINGHAM CITY HOMES’ OBJECTIVES

5.1 Ensuring that the organisation is fully abreast of developments that effect the core business of the organisation.

5.2 Consideration has been given to each of the topics listed in the report and where appropriate key implications are noted in the report.

6 EQUALITY AND DIVERSITY IMPLICATIONS

6.1 Has the equality impact of these proposals been assessed?
☐ Yes (EIA attached)
☒ No (this report does not contain proposals which require an EIA)

7 BACKGROUND MATERIAL AND PUBLISHED DOCUMENTS REFERRED TO IN COMPILING THIS REPORT

7.1 A wide range of housing policy information and digests have been consulted in the preparation of this report.

Contact officers: Dan Lucas
Strategy and Research Manager
Loxley House, Station Street, Nottingham NG2 3NJ
Tel: 0115 746 9470
E-mail: dan.lucas@nottinghamcityhomes.org.uk

Date: 21 March 2016
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NFA Summary on Budget Statement 2016

The Chancellor, George Osborne, outlined this year’s budget in his speech earlier this afternoon. The NFA welcomes the additional funding to tackle homelessness but is seriously disappointed with the lack of any support to build more affordable rented housing to tackle the real causes of homelessness – the chronic under supply of affordable housing across all tenures in this county:

Headline housing and regional announcements within the Budget:

- Radical devolution of power with new elected mayors in English counties (East Anglia, Western England and Greater Lincolnshire) along with a £1bn investment for each county.
  - Greater Manchester will get new powers over criminal justice to ramp up devolution. (Stockport Homes and Wigan & Leigh Homes are a part of this devolution agreement)
  - Gateshead Housing, Your Homes Newcastle and South Tyneside are members who are also part of the North East devolution agreement deal
  - Previously agreed mayoral devolution deals will also each receive un-ringfenced single pots of funding to spend on local priorities, worth £2.86 billion in total.
  - The Greater London Authority will move towards full retention of its business rates.

- £115m to support those who are homeless to reduce the numbers of people sleeping rough:
  - £100 million to deliver low-cost ‘second stage’ accommodation for rough sleepers leaving hostel accommodation and domestic abuse victims and their families moving on from refuges. This will provide at least 2,000 places to enable independent living for vulnerable households and individuals, freeing up hostels and refuges for those in most acute need.
  - £10 million over two years to support and scale up innovative ways to prevent and reduce rough sleeping, particularly in London.
  - Doubles the funding for the Rough Sleeping Social Impact Bond announced at the Autumn Statement 2015 from £5 million to £10 million, to drive innovative ways of tackling entrenched rough sleeping, including ‘Housing First’ approaches.

In the Red Book which outlines the full details of the Budget the following statements were made:

Social Housing Reform

- The government will explore ways to extend homeownership to social tenants who cannot afford to take advantage of existing schemes (we believe this is the on-going work on equity stakes).

- The government will introduce a taper within Pay to Stay, so that rents rise gradually above the minimum income thresholds of £40,000 in London and £30,000 outside of London.

- As announced on 27 January, the 1% annual reduction in social rents announced at the Summer Budget will not apply to supported housing in 2016-17.

Welfare

- From Autumn 2016, the government will introduce exemptions from the household benefit cap for recipients of Guardians Allowance, Carer’s Allowance and the carers element of Universal Credit from the household benefit cap, which caps the amount of benefits out-of-work working-age families can receive at £20,000, and at £23,000 in Greater London.
• The government will delay the ending of the payments of Housing Benefit and Pension Credit to claimants who travel outside of Great Britain for longer than 4 weeks consecutively. This will now come into force in May 2016.

Home Ownership

• The launch of the Starter Homes Land Fund prospectus, inviting Local Authorities to access £1.2 billion of funding to remediate brownfield land to be used for housing, to deliver at least 30,000 Starter Homes

• The delivery of 13,000 affordable homes two years early by bringing forward £250 million of capital spending to 2017-18 and 2018-19

Financial Inclusion

The government will restructure the statutory financial guidance providers – the Money Advice Service, The Pensions Advisory Service and Pension Wise – to ensure that consumers can access the help they need to make effective financial decisions. The new delivery model will direct more funding to the front line and focus support on areas of greatest consumer need. It will include:

• A new pensions guidance body, to make sure that consumers can get all their pensions questions answered in one place, at all stages of their lives

• A new, slimmed down money guidance body charged with identify gaps in the financial guidance market and commissioning providers to fill these gaps to ensure that consumers can access the debt advice and money guidance they need

Return to agenda
NOTTINGHAM CITY HOMES

REPORT OF DIRECTOR OF INVESTMENT AND BUSINESS SERVICES

THE BOARD
31 MARCH 2016

GROUP COMMUNICATIONS AND MARKETING STRATEGY 2016 - 2018

1 SUMMARY

1.1 The purpose of this report is to seek comments and approval for the Nottingham City Homes (NCH) Group Communications and Marketing Strategy 2016 – 2018.

2 RECOMMENDATIONS

It is recommended that the Board:

2.1 Discuss and comment on the draft Group Communications and Marketing Strategy for 2016 – 2018.

2.2 Delegates sign off of the final version following to the Chair to include the Board’s comments, and feedback from Your Forum and the Tenant Communications Panel.

3 REPORT

3.1 This strategy at Appendix 1 sets out the communication and marketing priorities for the NCH Group to continue building on and developing even more efficient and effective ways of communicating with and involving our tenants, leaseholders, customers, employees and stakeholders in decisions about services and policies that affect their lives.

3.2 This strategy also sets out the priorities for continuously improving all internal and external communications and marketing activity including the growth and use of digital channels and platforms.

3.3 Staff and Tenants will also have an opportunity to make comments on, and contribute to the strategy through NCH’s Your Forum group and the Tenant Communications Panel meetings.

3.4 This strategy sets out the proposed external key messages across the group, as follows:

Nottingham City Homes
“Creating Homes and Places where People Want to Live”

- We put our tenants and leaseholders at the heart of what we do.
• We are supporting our tenants through welfare reform, helping people into work and ensuring they pay their Rent first.
• We manage our estates well, working with tenants to look after their home, garden, and neighbourhood.
• We offer value for money as a not-for-profit organisation, employing local people and re-investing in the city.
• We are building new homes and improving existing ones, helping Build a Better Nottingham.
• We are reducing fuel bills and improving the environment by GreeniNG Nottingham.

Nottingham LiviNG
“Your Home in Nottingham”

• We offer the opportunity to rent a professionally managed and maintained, secure property which tenants can call their home.

Nottingham On Call
“Help when you need it”

• We provide reassurance, help and support, offering peace of mind at the touch of a button 24/7.

3.5 This strategy sets out the proposed internal key messages across the group, as follows:

• We value our staff and recognise great performance.
• We are a good employer, providing a number of additional benefits for our staff.
• We are delivering against our vision and corporate objectives, because of the hard work and commitment of our staff.
• We need to be commercially aware, to evolve and diversify as a Group.
• We need to continuously improve performance and value for money to meet our top ten ambition.

4 FINANCIAL, LEGAL AND RISK IMPLICATIONS

4.1 Financial Implications

4.1.1 Refer to the ‘resources’ section of the report.

4.2 Legal Implications

4.2.1 No legal implications

4.3 Risk Implications

4.3.1 Refer to the ‘risk and mitigation’ section in the report.
5 IMPLICATIONS FOR NOTTINGHAM CITY HOMES’ OBJECTIVES

5.1 The Group Communications and Marketing Strategy is underpinned by the Corporate Plan.

Communications and Marketing will continue to be key in enabling the NCH Group to be the type of organisation our tenants, leaseholders, customers, employees and stakeholders want it to be. This strategy will set out how Communications and Marketing activity will support the Group to achieve the goals of the Corporate Plan and contribute to the collective vision of ‘creating homes and places where people want to live’.

6 EQUALITY AND DIVERSITY IMPLICATIONS

The diverse nature of our customer base is considered in the report (section 4) and will be given due consideration on an ongoing basis when planning the content, style and delivery of communications and marketing activity.

6.1 Has the equality impact of these proposals been assessed?
☒ Yes (EIA attached and subject to comments from employee forums and tenants communication panel) (Appendix 2)

7 BACKGROUND MATERIAL AND PUBLISHED DOCUMENTS REFERRED TO IN COMPILING THIS REPORT

7.1 None

Contact officers: Name: Ruby Bhattal,
Head of Communications and Marketing
Address: Loxley House, Station Street
Tel: 0115 87 63340
E-mail: ruby.bhattal@nottinghamcity.gov.uk

Date: 23 March 2016
Nottingham City Homes Group
Communications and Marketing Strategy
2016 - 2018
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This is a Nottingham City Homes Group wide policy/strategy and its contents apply to any subsidiary company within the Nottingham City Homes Group, incorporating but not exclusive to Nottingham City Homes Registered Provider Limited (NCH RP), a company limited by guarantee which is Registered Provider and is regulated by the Regulator; and Nottingham City Homes Enterprises Limited (NCH Enterprises), a company limited by shares.
1. Introduction

The Nottingham City Homes (NCH) Group is ambitious. We want to build on our success and be recognised as one of the best housing organisations in the country, a leading innovator in social housing, delivering an excellent range of services to our tenants and leaseholders.

We are excited about our plans to expand as Nottingham City Homes Group with two subsidiary companies: Nottingham City Homes Enterprises Ltd and Nottingham City Homes Registered Provider Ltd.

Nottingham City Homes Group aims to achieve excellence in every area of our work – aiming to be amongst the top ten in all that we do. We are committed to placing our tenants and leaseholders at the heart of everything we do.

Communications and Marketing will continue to be key in enabling the Nottingham City Homes Group to be the type of organisation our tenants, leaseholders, customers, employees and stakeholders want it to be. This strategy will set out how Communications and Marketing activity will support the Group to achieve the goals of the Corporate Plan and contribute to the collective vision of ‘creating homes and places where people want to live’.

During the period of the previous corporate plan, we achieved what we promised:

- We increased tenant satisfaction to an all-time high
- We built new homes
- We delivered Decent Homes – on time and on budget
- We helped tenants and residents save money through energy efficiencies
- We improved our neighbourhoods
- We achieved 100% rent collection
- We introduced tenant scrutiny with our Customer Excellence Panel
- We established our Tenant Academy
- We achieved investors in People Gold accreditation and reaccreditation
- We won new business, providing services for other organisations
- We introduced the innovative and well-received Responsible Tenant Reward.
- We completed our Single Status exercise creating new pay structures and terms and conditions for 650 employees

These are some of our successes over the last ten years – it has been a transformational journey of progress in terms of culture, service and performance.
2. Communication and Marketing Achievements

With reference to the 2013-2015 Communications and Marketing Strategy, below is a summary of notable areas in which Communications and Marketing activity has contributed towards the company’s goals, successes and achievements.

Tenant Satisfaction with NCH and Feeling Informed

The STAR Survey 2015/16 shows record tenant satisfaction levels:

- 88% overall tenant satisfaction
- 88% satisfaction that the rent tenants pay is value for money
- 89% overall satisfaction with the quality of tenants homes
- 80% of our tenants agree or strongly agree that NCH has a good reputation.

Furthermore, the percentage of tenants who are satisfied with the overall service provided by the Group has increased 4 percentage points since 2013 to 88% in the most recent STAR Survey (2015/16). And, 87% of our tenant’s rate NCH as good at keeping them informed.

Corporate Brand Development

In 2014 we launched our refreshed brand identity guidelines – removing all service team specific sub-brands and developing a single corporate identity and the associated guidelines that our tenants, leaseholders and our stakeholders in particular can easily recognise and value.

Our vision is ‘creating homes and places where people want to live’. Having the right brand and image reinforces this – each time we are using the brand identity, we are demonstrating how we are working to achieve that vision.

We will continue to maintain a consistent corporate identity for Nottingham City Homes by using the brand and brand identity to support the promotion of key messages relevant to the main company.

Commercialisation brand development: Nottingham on Call and LiviNG

In addition to the main NCH brand we have developed two commercial brands for Nottingham On Call and LiviNG, our market rent arm. The Nottingham on Call brand was launched in October 2015 and the LiviNG brand is being developed to create two strong brands that can be recognised for making a positive contribution and to help attract new business from residents and businesses alike.

All three brand identities are illustrated in appendix 1.
NCH News

NCH News remains our flagship communications channel for our tenants and leaseholders. Following consultation with tenants, in 2015 we re-launched NCH News with a more magazine feel and reduced the frequency from a monthly to a quarterly publication. This included the addition of regular features, shorter more focussed content and a photography led approach. Satisfaction with NCH News from tenants and leaseholders continues to grow.

As pressures continue in relation to budgets, we will continue to investigate other ways in which savings can be made, including reducing the current size of the newsletter from A4 to A5.

Website and Social Media

The new Nottingham City Homes website went live in January 2016. It’s been developed in consultation with tenants to make it easier for customers to find the information they need to access our services and to aid the channel-shift objectives of the business. The second stage of the website project, which will run during the course of this plan, is to increase the functionality of the site to enable increased self-serve by residents, thus contributing to channel shift.

Use of social media through our two primary social media channels (Facebook and Twitter) has increased markedly during the lifetime of the last strategy. Going forward, the digital agenda will take a far greater priority as channel shift and the need for greater digital engagement with tenants and leaseholders in particular increases and the financial and political environment continues to present financial challenges.

Research tells us that 44% of our tenants have internet access at home, and of these 29% access the internet through their mobile phone. 51% of our tenants say they have no internet access.¹

Going forward, we will aim to promote both self-service and channel shift, to reduce spend on servicing customer queries and free up resource so we can provide direct support where there is no other option. Effective digital engagement will be key to facilitating this.

¹ NCH STAR Survey 2015/16
Building a Better Nottingham

The use of hoardings around the sites that we are developing as part of our Building a Better Nottingham programme has developed throughout the course of the last strategy. Working with Nottingham City Council (NCC), and our contractor partners, we have supported a consistent brand approach to Building a Better Nottingham and apply the brand across all of the sites where building work is being progressed. This will continue throughout the course of this strategy. We also intend to apply this approach to capital and planned works on existing stock where possible.

Publications

All company publications are produced according to our brand guidelines, with a core suite of publications given to tenants and leaseholders to provide a clear understanding of our key services. During the last strategy we developed a Welcome Pack that contains all corporate publications that tenants will require at the start of their tenancy.

Internal communications

In 2015 we launched our new monthly printed staff magazine 'Round the Houses', (replacing the previous online only publication 'Team Briefing’) and ‘Up Your Alley’ - managers’ email. These publications are designed to reach all NCH staff groups – including those who do not have regular computer access. Round the Houses was developed in consultation with staff to provide up-to-date information about what is happening across the Group.

The intranet remains a primary communications channel and will need development to meet our future needs.

In addition, there are admittedly areas of our work we were unable to progress or complete during the lifetime of the last Communication and Marketing Strategy – mainly due to new and/or emerging priorities and in a number of instances time constraints. These areas are listed below and will be incorporated into the delivery plan, which will support this strategy during 2016-2018:

- A clear and coherent approach to strategic internal communications – including the delivery of a new and improved intranet space for the workforce supported through mobile / handheld devices.
- Company notice boards utilised to full effect – particularly in local housing offices, tenant blocks and Independent Living Schemes as well as other general frontline services.
- A clear and coherent delivery plan for digital marketing channel development – with a clear sense of purpose for each platform.
3. Corporate Vision, Goals and Values

Our corporate vision is “to create homes and places where people want to live.”

Our Corporate Plan 2015-2018 expresses our ambition to be among the top ten housing organisations nationally.

To deliver the vision we have built on our previous corporate goals to include a fourth and new goal to reflect our ambition to grow our business and invest back into our communities.

Our corporate goals:

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<th>To be a first class housing organisation in the eyes of our tenants and leaseholders</th>
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Our values:

Our values (DRIVE) define the way we work, set out who we are as an organisation and shape customer expectations.

- **Passionate about** Delivering outstanding services
- **Respectful towards** our colleagues, our customers, and our communities
- **Always looking for ways to** Improve
- **Keen to provide great** Value for money
- **An** Effective team, working with each other, our customers and our partners
Our marketing and communications activity will demonstrate how we live our values by embedding them in everything we do.

**Company culture statement**

We want the Nottingham City Homes Group to be:

- A great place to work, with a clear sense of direction, shared by all, and ambitious to succeed on behalf of our customers.

- A place where people work as one team, where people believe in the values of the company and go the extra mile to deliver homes and places where our customers want to live.

- A place where colleagues are kept well informed, are listened to and whose views are respected, and where people are encouraged to learn and develop. A place where talent is nurtured, which has the courage to try things differently, where people are empowered to perform and individual performance is well managed, where success is celebrated.

- Widely respected as an efficient, professional organisation, demonstrably fair and honest, which represents the individual and reflects the diverse communities we serve, with a strong, confident external image both in word and deed.

Achieving our vision means keeping tenants, leaseholders, customers, employees and stakeholders well informed and involved – and keeping our professional workforce motivated to enable them to consistently deliver excellent customer services.

This strategy sets out the communication and marketing priorities for the Nottingham City Homes Group to continue building on and developing even more efficient and effective ways of communicating with and involving our tenants, leaseholders, customers, employees and stakeholders in decisions about services and policies that affect their lives.
4. Context

We are operating in a challenging national and local environment.

Proposed legislative and financial changes will make our goals much harder to deliver, such as:

- Ongoing cuts in public funding
- Implications of Welfare Reform and Universal Credit
- The proposed changes to social housing introduced in the Housing and Planning Bill
- Growing demand for services and expectations of our tenants and leaseholders, and
- Social and demographic change

... but with a collaborative attitude we will continue to do the best we can for the people of Nottingham.

National context

Welfare Reform: The government’s welfare reforms are wide ranging, and will inevitably have an impact on many of our existing and future customers. Social housing tenants are disproportionately represented amongst those in receipt of social security benefits, and reductions in benefit levels and tightened eligibility criteria (especially for working age people, and those suffering ill health) will disproportionately affect those that NCH works with.

Nottingham already had higher levels of deprivation than many other local authority areas, and has recently found itself ranked at a more extreme level in the 2015 Indices of Multiple Deprivation. Limited recovery from the recession following the 2008 global financial crisis also creates greater challenge for the city.

The roll-out of Universal Credit across the city means there is an increased risk that NCH will not receive the levels of rental income that it has in the past. Tenants will be responsible for paying their rent directly to us rather than rental income being paid to us directly from Housing Benefit.

Social Housing Changes: A number of changes have been announced (in the 2015 Budget and the Welfare and Work Act 2016) that will cumulatively have a significant impact on the resources NCH has available, and the service that is offered. The 1% compulsory rent reduction for four years, announced in the budget will, of course, lower the rents our customers pay, but it will also reduce the income available to provide services to help them with the challenges they face.

The Housing and Planning Bill is not law at the time of writing this Strategy, but it seeks to introduce some measures that will reduce security of tenure, increase rents for certain households (so called ‘pay to stay’), and requirements to sell ‘high value’
council homes when they become empty. Along with measures to introduce the Right to Buy in the housing association sector (in addition to much enhanced Right to Buy discounts for Council tenants already introduced in 2015), it is clear that there will be a reduced supply of social housing for those who seek it, at least for some time prior to arrangements for replacement homes to be built being in place. It has also been questioned if replacement homes will be able to be provided in equivalent numbers to match these reductions in any case.

These national policy changes will have a significant impact locally. How we utilise communications and marketing and indeed how we collaborate with our partners on these issues will be important in helping our tenants understand what this means for them, how they may or may not be affected and will also then enable us to support our tenants where we can, particularly in reducing any potential anxiety and concerns.

Local Context

The city’s ambitions are set out in the The Nottingham Plan to 2020\(^2\).

Nottingham City Council’s ambition for Nottingham citizens in the context of housing is also highlighted within the new Council Plan 2015-2019 as one of the council’s top five priorities ‘build 2,500 new homes that Nottingham people can afford to rent or buy’.

The Nottingham City Homes Group will seek to help the City Council achieve these objectives through our work to manage the council’s stock of homes, as well as with the housing we are developing under our own ownership.

Census data shows that the City is increasing in its diversity, in terms of ethnicity, nationality and country of birth. The City’s Housing Strategy, The Housing Nottingham Plan\(^3\) recognises the diversity of the city, and that there are a number of minority groups who have very specific housing needs, and the specialist housing and support theme of that Strategy seeks to address these. Again NCH will actively seek to play its part in helping the City Council meet those needs.

Communications and Marketing will need to continue playing a role in ensuring that communications with minority, new and emerging communities are accessible and easy to understand whilst also affordable – which may mean utilising more creative methods to reach minority, new and emerging communities with company information – as an alternative to the often expensive use of interpretation services.

\(^{2}\) http://www.onenottingham.org.uk/CHttpHandler.ashx?id=41140&p=0

\(^{3}\) http://www.nottinghamcity.gov.uk/housingplan
Equality and Diversity

The Nottingham City Homes Group manages homes in some of the most deprived parts of the city. Many tenants are among the most disadvantaged groups. It is clear the city faces significant challenges around health, worklessness, community safety and environmental sustainability.

Nottingham is a diverse city. Census data shows that the City is increasing in its diversity, in terms of ethnicity, nationality and country of birth and our customers reflect that diversity.

NCH’s customer profile has changed over time in line with Nottingham’s wider population. For example, 27.2% of tenants are from black, minority ethnic backgrounds up from 24.4% in 2012, and 13.9% of NCH customers have declared they consider themselves to be disabled, up from 12.5% in 2012.

We have seen an increase in the proportion of younger people living in the city, and a commensurate decrease in those aged between 65-79, with those aged over 80 growing in number. This has gone along with increased ethnic diversity and an increasing number of citizens born abroad. For example, the census revealed 250 different ethnic groups living in the UK of which 214 are represented in Nottingham. Improved questions around illness and disability allow a more detailed analysis of residents reporting the impact of these matters on their activities.

The diverse nature of our customer base must be understood when planning the content, style and delivery of our communications and marketing activity.

One of our key objectives is to make equality part of our everyday decision making – involving our equality forums in assessing the impact of services, training our workforce, and taking action to respond to the changing profile of the City.

The Social Housing Equalities Framework have praised the NCH Group for our knowledge and understanding of individual tenants’ needs.

NB: Data which sets out how NCH’s staff and customer profile compare with the City’s population can be viewed in the company Equality and Diversity Strategy 2016-18.

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What our workforce is telling us?

Nottingham City Homes Group is a IIP Gold accredited employer.

The most recent employee survey was undertaken in 2013 (Your Voice – employee survey 2013) and achieved a response rate of 82%.

From the overall findings, we can take confidence in that 91% of the workforce understands how their work fits with what the NCH Group is trying to achieve and 85% feel that there is effective communication between colleagues in their team.

The results also highlight opportunities exist where the company can build on the internal communication and engagement efforts to date to further improve internal communications and engagement in the interest of achieving the goals of the group. Three in five (61%) employees said they were satisfied with the quality of information that is provided about what is going on at NCH, while one in ten (10%) strongly agreed. One in eight (13%) were not satisfied – an area we will look to reverse. NCH staff have told us they would like to see internal communications improve.

Utilising digital communications platforms is key in this – as rollout of PDAs and smartphones continues in the repairs and maintenance team, scope is widening to engage employees right across the Group digitally via the intranet. To deliver the digital platform to all employees, the new intranet must be fit for purpose, usable across all devices, and easy to navigate.
5. The role of Communications and Marketing

Why do we need to communicate and market our news and services effectively?

Effective communication is a vital component in determining how our tenants, leaseholders, customers, employees and stakeholders judge the overall reputation of the Nottingham City Homes Group.

In particular, a strong brand supported by robust and consistent communications and marketing, improves customer awareness and take-up of our services. It is one of the simplest and most effective ways to improve customer satisfaction.

This Communications and Marketing Strategy is informed by extensive research by the Local Government Association (LGA) into drivers of resident satisfaction. The grid shows what matters most to our tenants and leaseholders:

<table>
<thead>
<tr>
<th>Greatest drivers of overall satisfaction</th>
<th>Perceived quality of all services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Perceived value for money</td>
<td>Media coverage</td>
</tr>
<tr>
<td>Media coverage</td>
<td>Direct communications</td>
</tr>
<tr>
<td>Direct communications</td>
<td>Performance</td>
</tr>
<tr>
<td>Performance</td>
<td>Liveability</td>
</tr>
<tr>
<td>Liveability</td>
<td>Positive experiences of contact with staff</td>
</tr>
</tbody>
</table>

This shows the importance of understanding our tenants and leaseholders, what their needs and expectations are, and making sure we effectively communicate to them. The research showed that overall perception is far more important than actual quality of service, as measured by traditional performance indicators (PIs).

However, this does not mean that communications can be a substitute for weak service delivery. It means that solid company/group performance, and a clear system for explaining that performance to target audiences is the key to raising satisfaction.

If services are to be continuously developed to be customer focussed we must:

- Listen and respond to tenants and leaseholders’ views and concerns – and involve them more in the development and running of our services
- Continue explaining often complex performance data as simply as possible
• Keep audiences informed and engaged via effective communication and marketing

• Improve the accessibility of services to socially excluded and vulnerable customers

• Work with key stakeholders to continue to build trust and confidence in the group

• Proactively identify and pursue opportunities to reflect the positive reputation of the NCH Group.

This strategy sets out how we will seek recognition as an innovative, excellent organisation that understands its tenants, leaseholders, customers, employees and stakeholders and involves them in the development of services and become a top ten performing housing organisation by 2018.

It identifies our key audiences, messages and strategic communication and marketing priorities, all of which are aligned to the Nottingham City Homes Group corporate plan goals and targets.
6. Our key audiences and required outcomes

To support the goals of the Nottingham City Homes Group, the key audience groups we need to focus on are set out in the table below alongside the outcomes we will work to achieve/deliver.

<table>
<thead>
<tr>
<th>Key Audience Group:</th>
<th>Outcomes:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Tenants and leaseholders</strong></td>
<td>- Ensure tenants are informed of the services that NCH delivers and to which they are entitled</td>
</tr>
<tr>
<td><strong>Tenant and leaseholder representatives</strong></td>
<td>- Ensure tenants are well informed about matters which affect them, e.g. Universal Credit, Housing and Planning Bill</td>
</tr>
<tr>
<td><strong>Area Panels, Forums, Associations</strong></td>
<td>- Provide support to tenants so they feel reassured</td>
</tr>
<tr>
<td></td>
<td>- Positively influence tenant satisfaction with NCH</td>
</tr>
<tr>
<td><strong>Staff Unions</strong></td>
<td>- All staff understand the group vision, values and objectives, and all the information they need to be ambassadors for the company</td>
</tr>
<tr>
<td></td>
<td>- Help maximise the number of staff who would recommend NCH as a good place to work</td>
</tr>
<tr>
<td></td>
<td>- Support and development for areas of NCH workforce to understand the Commercialisation agenda and NCH's ambitions</td>
</tr>
<tr>
<td><strong>Stakeholders:</strong></td>
<td>- Ensure all stakeholders are well informed about NCH activity</td>
</tr>
<tr>
<td>Board Members</td>
<td>- Help Councillors understand NCH activity in their wards areas to support the communication effort</td>
</tr>
<tr>
<td>Councillors, MP’s</td>
<td>- Influence opinion</td>
</tr>
<tr>
<td>Community &amp; Voluntary</td>
<td>- Galvanise support</td>
</tr>
<tr>
<td>Local &amp; National Groups</td>
<td></td>
</tr>
<tr>
<td>e.g. Homes and Communities Agency, National Federation of ALMOs, National Housing Federation</td>
<td></td>
</tr>
<tr>
<td>Suppliers, Contractors Media</td>
<td></td>
</tr>
<tr>
<td><strong>New Customers</strong></td>
<td>Achieve new business targets for:</td>
</tr>
<tr>
<td></td>
<td>- Repairs and Maintenance Services</td>
</tr>
<tr>
<td></td>
<td>- Nottingham on Call</td>
</tr>
<tr>
<td></td>
<td>- LiviNG</td>
</tr>
</tbody>
</table>
# Key Messages

## 7a. External Key Messages

### Nottingham City Homes

*“Creating Homes and Places where People Want to Live”*

- We put our tenants and leaseholders at the heart of what we do.
- We are supporting our tenants through welfare reform, helping people into work and ensuring they pay their Rent first.
- We manage our estates well, working with tenants to look after their home, garden, and neighbourhood.
- We offer value for money as a not-for-profit organisation, employing local people and re-investing in the city.
- We are building new homes and improving existing ones, helping Build a Better Nottingham.
- We are reducing fuel bills and improving the environment by GreeniNG Nottingham.

### Nottingham LiviING

*“Your Home in Nottingham”*

- We offer the opportunity to rent a professionally managed and maintained, secure property which tenants can call their home.

### Nottingham On Call

*“Help when you need it”*

- We provide reassurance, help and support, offering peace of mind at the touch of a button 24/7.
### Internal Key Messages

<table>
<thead>
<tr>
<th>Message</th>
</tr>
</thead>
<tbody>
<tr>
<td>We value our staff and recognise great performance.</td>
</tr>
<tr>
<td>We are a good employer, providing a number of additional benefits for our staff.</td>
</tr>
<tr>
<td>We are delivering against our vision and corporate objectives, because of the hard work and commitment of our staff.</td>
</tr>
<tr>
<td>We need to be commercially aware, to evolve and diversify as a group.</td>
</tr>
<tr>
<td>We need to continuously improve performance and value for money to meet our top ten ambition.</td>
</tr>
</tbody>
</table>
8. Strategic Communications and Marketing Priorities

To support our corporate goals and taking into account national, local context, changes in the communities we serve and what our tenants/leaseholders and employees are telling us - the communication and marketing priorities for the NCH Group are set out in the table below:

<table>
<thead>
<tr>
<th>MEDIA MANAGEMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Colleagues will work to support strategic and proactive news management e.g. early identification of good news stories or potential negative coverage and management of negative stories whilst protecting the reputation of the NCH Group.</td>
</tr>
<tr>
<td>• Activity will be monitored through a monthly media performance report to EMT.</td>
</tr>
<tr>
<td>• An indexed gallery of professionally produced photographs and videos will be available to support communications and marketing efforts, including the use of tenant quotes and reflecting the communities we serve.</td>
</tr>
<tr>
<td>• We will develop and nurture constructive relationships with key contacts within the local media and specialist trades press.</td>
</tr>
<tr>
<td>• Media Awareness training will be made available for identified NCH colleagues and Board members as appropriate.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>INTERNAL COMMUNICATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>• We will continuously improve internal communications and engagement with the goal to make every frontline staff member an NCH Group ambassador – this will be supported with the further roll out of mobile/handheld devices for a wider range of staff.</td>
</tr>
<tr>
<td>• Deliver focused campaigns to include the ‘Rent First’ to maximise rental income; and the relaunch of ‘Eyes Wide Open’ as an all staff approach to being the eyes and ears of the company and our estates.</td>
</tr>
<tr>
<td>• We will develop and deliver a new and improved intranet for the workforce and explore the potential of other innovative channels.</td>
</tr>
<tr>
<td>• We will maintain the ‘Round the Houses’ as a monthly staff newsletter with 100% coverage of all staff.</td>
</tr>
<tr>
<td>• Email communications with ‘all staff’ will become more streamlined and focus on carefully chosen content so the workforce begins to value email updates because they are short, punchy and hold relevant and/or important information.</td>
</tr>
<tr>
<td>• NCH Group (vision, values and DRIVE) signage will consistently be in place in all workplaces to help remind the workforce of behaviours and attitudes expected of each employee, which forms part of the NCH Group brand offer.</td>
</tr>
</tbody>
</table>
• We will promote volunteering and personal training and development opportunities.

• We will continue to deliver informative staff conferences of a professional standard annually in addition “Your Forum” and engagement events.

• We will review (against purpose and effectiveness) and conclude the best e-staff forum for the workforce.

• We will create the cultural conditions to enable the NCH Group to grow successfully to support the need for the commercialisation agenda e.g. marketing training and deliver on our Customer Promises.

• We will demonstrate why the NCH Group is a great place to work and develop a career, to help develop a sustainable workforce.

• We will recognise and celebrate the achievements of our workforce through delivering the annual staff STAR Awards.

• We will build on the program of employee engagement activities and ensure unions and managers work collectively in employee and company interests.

• We will measure the impact of these internal communication actions through the Workforce Survey planned in 2016 and onwards.

**BRANDING AND SIGNAGE**

• We will ensure brand identity guidelines/manuals for NCH, Nottingham On Call and LiviNG are reviewed regularly and updated as required and ‘manage’ 100% compliance at all times.

• Communications and Marketing service will lead decisions in relation to the development of new logos/sub-brands e.g. initiatives such as Eyes Wide Open, CommUNITY, or Fit in the Community, to mitigate the benefits of positive brand recognition/association with NCH Group.

• We will forward plan for effective signage to be deployed both on vehicles; within stock; on estates/ new builds and major works in a timely fashion to leverage the benefits from communicating the NCH Group involvement/contribution: full or in part.

• We will make the most of notice boards and the use of posters which will be presented with consistency across all our places of work across the city (including tenant blocks and Independent Living provision).

• We will use branded hoardings on all capital and programmed works where possible.

• The NCH Group will recognise that the Communications and Marketing function will exercise corporate control and sign off over all merchandising and sponsorship.
- The NCH Group will liaise with NCC over jointly branded initiatives such as Building a Better Nottingham to ensure tenants can attribute the contribution of both the NCH Group and NCC in ‘creating homes and places where people want to live’.

- We will use GreeniNG Nottingham branded signage for energy efficiency and fuel poverty projects.

**WEBSITE AND SOCIAL MEDIA**

- The company’s digital communication offer will continue to be developed. The website, the intranet, social media and digital engagement – linking with systems such as Northgate and CRM to enable ‘channel shift’ enabling tenants, leaseholders and customers to undertake transactions online where possible.

- We will maintain, develop and improve the NCH website and to use it as a truly meaningful digital platform enabling self-service. Content will be continuously updated and inclusive through “how to” video links

- We will invest and grow the NCH Group social media offer with a focus on twitter, Facebook and LinkedIn platforms. We will assess the merit of new social media platforms given the nature of development in this area. And, will use a forward plan for proactive social media publishing and set protocols on who has publishing access within the Group.

- We will develop and introduce a Social Media Policy for the workforce, to complement and support the roll-out of mobile and handheld devices.

- We will use picture and video content to support the NCH Group goals and streamlined in a single online space e.g. "How to" video links on YouTube.

- The Homelink website needs to be brought into line with the new NCH website.

- Nottingham On Call website needs to be regularly maintained.

- The ‘jobs at NCH’ web page will be refreshed.

**COMMERCIAL MARKETING**

- We will support our workforce and the transformation required in the culture of the organisation so that more and more of the workforce can support the commercialisation agenda – this will be supported through marketing training for colleagues as appropriate.

- Nottingham On Call and LivINg – will each have a clear marketing strategy appropriately resourced to match the business’ customers.
EXTERNAL COMMUNICATION

- Review and develop the Tenant Communications Panel (*see below).
- Deliver focused campaigns to include ‘Rent First’, and ‘Little Things Mean a Lot’ – linked to reducing fuel poverty and GreeniNG Nottingham.
- We will review NCH News and consider how cost can be reduced and continue to deliver four editions a year’, whilst also continuously improving readability through a more picture-led approach.
- Use profile information and demographic profiling to ensure we are communicating with our customers in a format they can access and understand (linked to CRM).
- Staff notice boards and the use of posters will be presented with consistency across the workplace in all our places of work across the city (including tenant blocks and Independent Living provision).
- Proactively use hoardings as promotional space to state what the NCH Group is going and the benefits e.g. £xxm investment, creating local jobs etc.
- Continually improve the quality of printed material e.g. leaflets, posters, tenant handbook.
- Improve our distribution channels to enable cost effective targeting of communities and individuals.
- We will develop and deliver regular / periodic ward based information about the NCH Group to individual Ward Councillors.
- We will utilise all available channels to keep a raised profile among tenants of the Responsible Tenant Review Scheme.
- Promote the Tenant Academy and other activities in supporting tenants into employment.
- Provide tenancy sustainment support including pre-tenancy activity.
- We will recognise and celebrate the achievements of our tenants through PR and Tenant Achievement Awards.
- Achieve good customer care and consistency across the group with outbound communications through:  
  - improving responses provided over the phone and in writing,  
  - undertaking a review of all standard letters to include ‘sorry we missed you’ calling cards,  
  - deploying bespoke communications when required, and  
  - linking into the CRM system**.
- Through the Communications and Marketing service we will provide a governance mechanism over the submission of entries for Awards limited to UKHA, TPAS and the NFA.
EVENT SUPPORT

- We will continue to deliver strategic corporate NCH Group events, such as: Tenant Fun Day, AGM, Awards events, STAR Awards, Garden Competition, Staff conference etc.

**CRM**

- We will use the new CRM system to record a customer's preferred method of contact and will use this wherever possible.
- We will embed CRM system across the business so that staff can access a single customer view which provides key information to allow us to respond effectively.
- We will promote the CRM system and its capabilities and functionality by employing a range of internal communications channels including the intranet, ‘Round the Houses, emails and print.

* Tenant Communications Panel

The Tenant Communications Panel is made up of a group of tenants from across the city. The panel makes sure that all communications delivered by Nottingham City Homes to tenants and leaseholders is clear, relevant, and understandable and delivered in a timely manner. The panel work alongside the other customer panels and assist them, as required, with any communications issues they face. The panel meets formally four times a year – although ad hoc meetings can be arranged as appropriate.

Activities that the panel take part in include:

- Approval of the text and format of Nottingham City Homes core publications and leaflets as appropriate
- Comment and input upon electronic communications – including the Nottingham City Homes corporate website and the Nottingham HomeLink website
- Review the Nottingham City Homes newsletter, ‘News from Nottingham City Homes’, in terms of format, readability, appeal, accessibility, photographs, diversity
- Comment upon and make suggestions regarding large tenant and leaseholder communication campaigns
- Playing an important role in the tendering of any new contracts in relation to the newsletter – specifically in regards to design and value for money.

During the course of the lifetime of this strategy, the panel will be developed to be more reflective in terms of age, gender and ethnicity to reflect our current tenant profile. Communications specification training via the Tenant Academy to better support tenant representatives on the panel.
## 9. Performance Measures

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Overall tenant satisfaction</td>
<td>88.40%</td>
<td>91%</td>
<td>93%</td>
<td>93%</td>
<td>93%</td>
</tr>
<tr>
<td>Number of tenants who feel that they get VFM for the rent they pay</td>
<td>87.68%</td>
<td>88.50%</td>
<td>90%</td>
<td>90.50%</td>
<td>90%</td>
</tr>
<tr>
<td>Tenant satisfaction that NCH keeps tenants informed about things that might affect them</td>
<td>86.42%</td>
<td>92.50%</td>
<td>93%</td>
<td>93%</td>
<td></td>
</tr>
<tr>
<td>Percentage of tenants funding NCH News 'very interesting'</td>
<td>33.86%</td>
<td>40%</td>
<td>45%</td>
<td>50%</td>
<td></td>
</tr>
<tr>
<td>Percentage of press releases used to target media</td>
<td>90.73%</td>
<td>92%</td>
<td>93%</td>
<td>94%</td>
<td></td>
</tr>
<tr>
<td>Number of unique visitors to company website</td>
<td>45,000</td>
<td>48,500</td>
<td>50,000</td>
<td>52,500</td>
<td></td>
</tr>
</tbody>
</table>
10. Resources

Value for money

We will ensure that all communications and marketing activities are planned cost effectively.

We will:

- Have a dedicated communications and marketing team for the NCH Group
- Continue our partnership work with Nottingham City Council
- Co-ordinate the flow of information to tenants, leaseholders and customers from different parts of the group, to make sure key messages are being targeted effectively.
- Develop new and innovative ways to communicate, using new technology to reduce costs where possible (linked to the ICT strategy and Customer Service Strategy). This will focus around the company's website and intranet, and will include a range of social media tools.
- Regularly review and renegotiate agreements with suppliers to drive down costs, improve quality, or ideally both.
### 11. Risk and Mitigation

<table>
<thead>
<tr>
<th>Key Risk</th>
<th>Management action to mitigate risks</th>
</tr>
</thead>
<tbody>
<tr>
<td>NCH could be “blamed” for Government policy and finance decisions</td>
<td>Provide information to stakeholders so they are aware of Government decisions which affect them</td>
</tr>
<tr>
<td>Low staff morale across NCH due to major changes - resulting in poorer service to customers</td>
<td>Internal comms will be part of raising morale. Work with HR and OD teams to manage and boost morale</td>
</tr>
<tr>
<td>Welfare Reform - lack of awareness of changes among staff and customers</td>
<td>Consistent approach to 'Rent first' and budgeting support</td>
</tr>
<tr>
<td>Failure to manage media relations effectively could result in negative headlines</td>
<td>Ensure resource available to manage PR. Ensure appropriate prioritisation takes place.</td>
</tr>
<tr>
<td>Failure to effectively publicise key initiatives, resulting in poor take up of services</td>
<td>Forward Plan developed and agreed with service heads/directors</td>
</tr>
<tr>
<td>Failure of customers to identify the NCH brand and its values and how they deliver excellent services</td>
<td>Consistent application of correct brand across all platforms. Key messages identified and applied.</td>
</tr>
<tr>
<td>Ad hoc requests for campaigns/initiatives/spend not already considered or funded</td>
<td>Careful consideration and sign off of content of Forward Plan and awareness of budgetary constraints</td>
</tr>
<tr>
<td>Failure to manage social media effectively - unmoderated comments could adversely impact NCH or be inappropriate for audience</td>
<td>The development and implementation of a Social Media Policy for the NCH Group</td>
</tr>
</tbody>
</table>
### What is being assessed:


Sets out how the NCH Group will communicate with and involve our tenants, leaseholders, customers, employees and stakeholders in decisions about services and policies that affect their lives and key messages and mechanisms to embed the most effective culture possible to deliver our corporate plan goals:

- To be a first class housing organisation in the eyes of our tenants and leaseholders.
- To be a major player in transforming the quality of life in our neighbourhoods.
- To be a great place to work, widely respected as an efficient and professional organisation.
- To generate new business, securing income to reinvest in Nottingham and our communities.

### Information we are using to analyse the effects on equality:


<table>
<thead>
<tr>
<th>Could particularly benefit (X)</th>
<th>May adversely impact (X)</th>
<th>How different groups could be affected - summary of issues identified.</th>
<th>Details of actions to increase positive or reduce negative impact (or why action is not possible).</th>
</tr>
</thead>
<tbody>
<tr>
<td>People from different ethnic groups</td>
<td>X</td>
<td>X*</td>
<td>Profiling data as set out in the strategy indicates a range of tenant needs the company’s communication and marketing activity need to have regard to, including an increasing proportion of minority ethnic customers including those from new communities.</td>
</tr>
<tr>
<td>Men, women (including maternity/pregnancy impact), transgender people</td>
<td></td>
<td></td>
<td>Ongoing work with tenant Communications Panel to ensure information for customers is in plain English.</td>
</tr>
<tr>
<td>Disabled people or carers</td>
<td>X</td>
<td>X*</td>
<td>Promotion of English for Speakers of Other Languages alongside provision of translation and interpretation is relevant both to assist communication with tenants, leaseholders and customers, promote value for money, and help all groups integrate into the local community.</td>
</tr>
<tr>
<td>People from different faith groups</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lesbian, gay or bisexual people</td>
<td>X</td>
<td></td>
<td>The objective on ‘Consistent application of a ‘house style’ for plain English, to be used across all literature, publications and customer</td>
</tr>
<tr>
<td>Older or younger people</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other (marriage/civil partnership, looked after</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
* based on these groups having additional needs.

communications’ is likely to benefit those with low literacy, learning difficulties and/or limited English.

The objectives noted in the Strategy to ‘Use profile information and demographic profiling to ensure we are communicating with our customers in a format they can understand’ / ‘Improve our distribution channels to enable cost effective targeting of communities and individuals’ / ‘Make further use of social media tools to reach the widest possible audience’ and expansion of text messaging are expected to particularly benefit younger tenants and working parents.

The new corporate website has been developed in consultation with tenants to make it easier for customers to find the information they need to access our services. The website is responsive to mobile devices and with 24/7 access to key services which is expected to particularly benefit younger tenants and working parents.

The Strategy notes that steps are being taken to ensure an inclusive stock of imagery, for example in relation to the LGBT (Lesbian, Gay, Bisexual and Transgender) community.

Profiling data indicates NCH has a number of British Sign Language (BSL) using Deaf customers; this is not currently noted in the strategy. While provision is made where requested e.g. in partnership with Nottinghamshire Deaf Society.

The objective of offering partners space within our newsletters to promote services of relevance for example Making Information and Services Accessible Guide.
to our customers is an opportunity to promote services (for example voluntary groups and social enterprises) relevant to older, disabled, BME and other tenant groups and supports a key action in the E&D Action Plan.

<table>
<thead>
<tr>
<th>Outcome(s) of equality impact assessment:</th>
</tr>
</thead>
<tbody>
<tr>
<td>No major change needed ✓ Adjust the policy/proposal/service □ Adverse impact but continue □ Stop and remove the policy/proposal □</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Arrangements for future monitoring of equality impact:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subject to comments from employee forums and tenant citizen communication panel.</td>
</tr>
<tr>
<td>Date for EIA of Marketing and Communications to be set out in 3-year Equality Impact Assessment timetable.</td>
</tr>
<tr>
<td>Ongoing review of company communications by tenant Communications Panel.</td>
</tr>
</tbody>
</table>

Approved by (manager signature): Jonathan Shaw, Director of Business Services  Date sent to equality team for publishing: 31 March 2016
1 SUMMARY

1.1 This paper introduces the Group’s Children, Young People and Vulnerable Adults Safeguarding Policy which is attached as Appendix 1.

2 RECOMMENDATIONS

It is recommended that the Board:

2.1 Consider and provide comment on the content of the Children, Young People and Vulnerable Adults Safeguarding Policy

2.2 Delegate to the Chair of the Board the sign off of the Group Children, Young People and Vulnerable Adults Safeguarding Policy

2.3 Approve that NCH establish all employees to take the role of an ‘alerner’ and all Managers to take the role of Referrer for their service area – whose role it will be to provide guidance and responsibility for deciding the most appropriate action to be taken with any alert.

3 REPORT

3.1 The Care Act and Housing

3.1.1 The Act is focussed on reforming the Social Care system in England and includes local housing authorities and housing providers as significant partners for health and care.

3.1.2 A basic requirement is placed on a local authority to promote ‘well-being’. This is defined as covering everything from personal dignity to social and economic well-being. This brings greater responsibilities for NCH, from preventing older tenants from experiencing falls to stopping the financial abuse of people who are vulnerable. Identifying and supporting hoarders will also be important in fulfilling our responsibilities in relation to this Act.

3.2 The Children Act
3.2.1 We recognise our role in protecting children and young people from abuse and harm, viewing the welfare of children as paramount, as enshrined in the Children Act 2004.

3.2.2 There are four main types of child abuse: physical abuse, sexual abuse including child sexual exploitation, emotional abuse and neglect. The abuser may be a family member, or they may be someone the child encounters in a residential setting or in the community, including during sports and leisure activities. An individual may abuse or neglect a child directly, or may be responsible for abuse because they fail to prevent another person harming that child.

3.3 The Group’s Role

3.3.1 A number of adults, children and young people identified as being at risk live in social housing, so it is important that we have a robust response to supporting their needs and preventing and identifying risk of harm and abuse. Failure to do so would also carry a reputational risk.

3.3.2 Nottingham City Homes has identified the posts that require Disclosure and Barring Service checks and have robust processes in place to regularly review these in accordance with the Disclosure and Barring Service (DBS) Policy.

3.3.3 This Policy applies to subsidiary companies within the Group, including Nottingham City Council stock managed by NCH and stock developed through our registered provider and where appropriate also to the market rent subsidiary.

4 FINANCIAL, LEGAL AND RISK IMPLICATIONS

4.1 Financial Implications

4.1.1 There are no financial implications associated with the introduction of this Policy, beyond the resources required to train staff that are included in existing budgets.

4.2 Legal Implications

4.2.1 Compliance with existing legislation, particularly the Care Act, where there are specific requirements on Housing Providers to ensure ‘well-being’.

4.3 Risk Implications

4.3.1 Legal and reputational risk of non-compliance with provisions of the Act in terms of failing to identify and report adult safeguarding issues.

4.3.2 Customer insight data fails to pick up a vulnerable individual who goes on to suffer serious incident, injury or death. Serious Case Review follows.
IMPLICATIONS FOR NOTTINGHAM CITY HOMES’ OBJECTIVES

5.1 The approach to safeguarding set out in this paper underpins the following Nottingham City Homes’ objectives:

- To be a first class housing organisation in the eyes of our tenants and leaseholders.
- To be a great place to work, widely respected as a first class organisation.

EQUALITY AND DIVERSITY IMPLICATIONS

6.1 Has the equality impact of these proposals been assessed?
☑ Yes (EIA attached as Appendix 2.)
☐ No (this report does not contain proposals which require an EIA)

The following risks have been noted alongside appropriate control measures:

Risk: Customer insight data fails to pick up a vulnerable individual who goes on to suffer serious incident, injury or death. Serious Case Review follows.

Controls: Regular Tenancy Visits includes a focus on updating all tenancy information including any vulnerability and safeguarding concerns.

Risk: Legal and reputational risk of non-compliance with provisions of the Act in terms of failing to identify and report adult safeguarding issues.

Control: New Adult Safeguarding policy, a rolling programme of training for all staff and associated performance measures to be introduced to ensure that any potential safeguarding issues are identified and addressed. Measures will include number of cases identified and number referred to NCC Adult Safeguarding Board.

BACKGROUND MATERIAL AND PUBLISHED DOCUMENTS REFERRED TO IN COMPILING THIS REPORT

7.1 The following documents have been references in the Policy:

- Social Care Institute for Excellence (SCIE) Adult Safeguarding for housing staff: Guidance for Housing Managers.
- Nottingham City Council (NCC) Vulnerable Adults Plan 2011-2014.
- Nottingham City Council Adult Safeguarding procedures.
- Care and Support Statutory Guidance, issued under the Care Act 2014.
- Department of Health (2013b) Fact Sheet 7 The Care Bill – Protecting adults from abuse or neglect.

**Contact officers:**

Name: Gez Kinsella  
Regional Manager, Tenancy and Estate Management  
Tel: 07939 284002  
E-mail: gez.kinsella@nottinghamcityhomes.org.uk

**Date:** 16 March 2016
Appendix 1

Group Children, Young People and Vulnerable Adults
Safeguarding Policy

<table>
<thead>
<tr>
<th>Issue date</th>
<th>23 February 2016</th>
</tr>
</thead>
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<td>Version</td>
<td>V3</td>
</tr>
<tr>
<td>Status</td>
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<td>Effective from</td>
<td>1st April 2016</td>
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<td>Review date</td>
<td>1st April 2017</td>
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<tr>
<td>Author/Reviewer</td>
<td>Gez Kinsella – Regional Housing Manager (North)</td>
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<td>Verifier</td>
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<tr>
<td>Teams affected</td>
<td>All teams</td>
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</table>
1. **Introduction and context**

*Safeguarding is everyone’s responsibility. We have a duty of care to our tenants.*

1.1 Housing employees have a key role to play, alongside social care, health and police colleagues, in keeping children, young people and vulnerable adults safe. We are well placed to identify people with care and support needs, share information and work in partnership to coordinate responses to safeguarding concerns.

1.2 Social Care Institute for Excellence (SCIE) research has also shown that Serious Case Reviews indicated housing providers could or should have played a more effective role with particular regard to adult safeguarding. ¹

1.3 The Care Act 2014 has clearly set out the role that we have to play in safeguarding adults and specifically identifies housing as an important partner in preventing, identifying and supporting tenants at risk.

1.4 This policy has been developed using guidance from the department of Health publication ‘No Secrets’ and Working Together to Safeguard Children 2010. Guidance from the Department of Children, Schools and Families on the Every Child Matters cross government strategy has also been considered. Under “Every Child Matters” every organisation and adult has a responsibility to safeguard all children they come into contact with.

1.5 We recognise our role in protecting children and young people from abuse and harm, viewing the welfare of children as paramount, as enshrined in the Children Act 2004.

1.6 Child abuse commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a child regardless of their age, gender, race or ability.

1.7 There are four main types of child abuse: physical abuse, sexual abuse, emotional abuse and neglect. The abuser may be a family member, or they may be someone the child encounters in a residential setting or in the community, including during sports and leisure activities. An individual may abuse or neglect a child directly, or may be responsible for abuse because they fail to prevent another person harming that child.

¹ Social Care Institute for Excellence (SCIE) Adult Safeguarding for housing staff: Guidance for Housing Managers
1.8 Safeguarding is implicitly embedded in our vision, values and corporate goals. The Director of Housing and Customer Service is the strategic safeguarding lead for Nottingham City Homes (NCH). We also sit on Nottingham City Council’s Operational Management Group and a number of sub-groups for adult safeguarding to support this.

2. Legislation

2.1 The Children Act 1989 later amended by the Children Act 2004 allocates duties to local authorities, courts, parents and other agencies in the United Kingdom, to ensure children are safeguarded and their welfare is promoted.

2.2 The Care Act 2014 modernises the law so that people’s wellbeing is at the heart of the care and support system. Duties under the Act came into force in April 2015. Unlike the Children Act, The Care Act is far more proscriptive about the role of housing and housing providers. This level of proscription is reflected in this Policy.

2.3 The statutory guidance for the Care Act states that housing and housing support providers must ensure that:

- They have clear operational policies and procedures in adult safeguarding.
- All staff are trained in recognising the symptoms of abuse.
- All staff are able to respond to safeguarding concerns.
- There are clear monitoring and reporting arrangements in place for adult safeguarding concerns.

2.4 Principles of the Care Act

2.4.1 This policy is based on the principles and values that govern how safeguarding procedures should be implemented. These reflect the most recent national guidance. The underpinning aim is to achieve good outcomes for adults at risk, based on a culture of acceptable risk (including a person’s right to make the “wrong” decision). The six principles are:

- **Empowerment** – adults should be in control of their own lives and their consent is needed for decisions and actions designed to protect them. It is therefore vital that, if someone has mental capacity and is able to make their own decisions, they maintain control. The professional’s role is to support their decision making at each stage of the process. This includes taking action only with consent unless there is clear justification to act
contrary to the person’s wishes i.e. they lack mental capacity, or they/others are in danger.

- **Protection** – procedures should provide a framework by which people can be supported to safeguard themselves from abuse/harm, and in some cases safeguard others from the person who is vulnerable; or be protected where they are unable to make their own decisions about their safety (due to reasons of mental capacity).

- **Prevention** – this is the main goal and everyone has a role to prevent abuse from occurring. This includes promoting awareness and understanding and supporting people to safeguard themselves. It also refers to organisations having systems in place to minimise the risk of abuse, for example telecare services and aids and adaptations.

- **Proportionality** – this is the responsibility to ensure that responses to concerns/alerts are proportional to the assessed risk and the nature of the allegation/concern. Proportional decisions need to take into account the principles of empowerment and protection (above). Where a person lacks the mental capacity, any decisions made on their behalf must be made in the persons “best interests” and be least restrictive to their rights and freedoms.

- **Partnerships** – working together to prevent and respond effectively to incidents or concerns of abuse. This includes working with the person to support their decision making, with relatives, friends, informal carers and other representatives, (for example advocates) to achieve positive outcomes for the person at risk. Also working collaboratively with other agencies and for statutory agencies to value the role of non-statutory partners.

- **Accountability** – involves transparency in decision making, by individuals and organisations, ensuring that defensible decisions are made and there are clear lines of accountability. This means that organisations, their staff and partners understand what is expected of them, that they act on those responsibilities and accept collective accountability for their safeguarding arrangements.

3. **Associated documentation**

3.1 Safeguarding is not a stand-alone policy or separate activity. It is part of our wider policy and operational frameworks. Policies and procedures that should be considered in conjunction with this one include:
• Governance.
• Disclosure and Barring Service (DBS) Policy.
• Code of conduct.
• Disciplinary.
• Whistleblowing.
• Lone Working.
• Anti-Social Behaviour.
• Tenancy visit.
• Introductory Tenancy Review.
• Allocations.
• Confidentiality and Data Protection.
• Recruitment (including DBS policy).
• Anti-Fraud, anti-bribery, anti-money laundering.
• Risk register.
• Fire Safety for Vulnerable Tenants.
• Regular Tenancy Visits.

4. Policy Statement

4.1 NCH understands the importance of its role in prevention, identification and support of any tenant or household member at risk of harm, neglect and/or abuse. We are committed to safeguarding adults, young people and children and see this as a core responsibility as a housing provider.

4.2 We will seek to keep children and young people safe by listening to, respecting and valuing them. Working with others, we will adopt effective child protection practices through effective procedures, including working with others in information sharing protocols.

4.3 Child safeguarding incorporates Child Sexual Exploitation. Our approach is aligned to Safeguarding Children and Young People from Sexual Exploitation Procedures (May 2015) of the Nottinghamshire Safeguarding Children Board and the Nottingham City Safeguarding Children Board.

4.4 As a housing provider, the Care Act is clear that we must have our own Adult Safeguarding policies and procedures. These should set out how we will operate when we receive a safeguarding alert. This policy sets out the principle underpinning our commitment to safeguarding, supported by our procedure, setting out how, operationally, we ensure safeguarding.

4.5 This Policy applies to subsidiary companies within the Group, including Nottingham City Council stock managed by NCH and stock developed
through our registered provider and where appropriate also to the market rent subsidiary. This policy applies to employees, those working with us, contractors, students on placement, agency staff, apprentices, key partners, and in certain circumstances, volunteers.

4.6 We are committed to ensuring that all staff are appropriately trained, in proportion to their role and level of responsibility. Training for all frontline employees will be refreshed periodically to ensure it knowledge and practice is up to date. We will also work with our safeguarding partners to ensure that this training is aligned or joint training is provided where possible.

4.7 We will ensure that all employees that come into contact with people who may be at risk of abuse, neglect or harm are able to:

- Identify the possible dangers, including potential and actual abusers.
- Identify the possible indicators of abuse.
- Record, report and share information appropriately on the Safeguarding Log.

4.8 We already have a number of mechanisms to identify and support vulnerable people. This includes but is not limited to:

- ‘Eyes Wide Open’ Scheme.
- Support Needs Assessments.
- Rent Vulnerability Assessments.
- Customer profiling.
- Independent living support planning.
- Tenancy Sustainment Team advice and support.
- ASB case management.
- Tenancy visits.

4.9 We are also a key partner on a number of forums aimed at supporting vulnerable adults. These include:

- Multi-Agency Risk Assessment Conferences (MARAC).
- Domestic Abuse Referral Team (DART).
- Complex Persons Panel (CPP).

4.10 We will act upon any concerns reported to us via tenants, leaseholders, voluntary and community partners, and any other persons working in the communities we serve.
4.11 All NCH employees will take the role of an ‘alerter’ where they suspect or receive a safeguarding concern. The role of the ‘alerter’ is to report any concern of safeguarding to a referrer to ensure a person’s safety and well-being.

4.12 All Managers must take responsibility for any alerts that come to their attention in their service area. Managers also have a key role to play in helping develop understanding, knowledge and confidence to ensure protection procedures are followed properly, professionally and safely. Arrangements are in place to ensure that no member of staff making an alert has to shoulder this burden on their own.

4.13 All Managers must take the role of a Referrer where they suspect or receive a safeguarding alert. The Referrer is responsible for deciding the most appropriate action to be taken with any alert. This may be to make a safeguarding referral, deal with the concern as an internal matter, or not take the issue any further.

**It is not the responsibility of any NCH member, employee, volunteer or contracted service provider to determine whether abuse is actually taking place. However, it is the responsibility of every NCH member, employee, volunteer or contracted service provider to take the actions set out in this policy and associated procedure if they are concerned abuse is taking place.**

5. **Prevention**

5.1 All NCH employees can minimise the risk of abuse by:

- Attending safeguarding training to increase awareness of abuse, how to identify and report it. Refresher training will be conducted periodically for all NCH employees.
- Being alert to risk factors for abuse before any visit to a property. Employees can find this information by checking a tenant’s profile, Serengeti, or Northgate notepad entries and React for instances of anti-social behaviour.
- Actively engaging in the ‘Eyes Wide Open’ Scheme and communicate concerns appropriately and promptly as set out in the Scheme.

5.2 We will use customer profiling as a preventative tool and to identify any adult we consider to be vulnerable and/or at risk of tenancy failure.
5.3 If it is suspected that a tenant or any member of their household is vulnerable a Support Needs Assessments will be undertaken as part of the Regular Tenancy Visit process undertaken by the Housing Patch Manager (HPM) or Independent Living Co-ordinator (ILC) (for independent living tenants). The purpose of the assessment is to identify whether any additional support is required from NCH or any other agency. The HPM/ILC will also make contact with the appropriate service or agency to ensure that support is provided.

5.4 We will also assess the suitability of living accommodation both before a tenancy is allocated and throughout an existing tenancy. This will include providing information on known problems in an area (e.g. distraction burglary or levels of hate/mate crime) to ensure tenants at risk of harm/abuse are in suitable living accommodation. Where we have information of an applicant or tenant who may be vulnerable to abuse, we will ensure that allocations of properties considers the risk.

6. Equalities

6.1 We will ensure we comply with the Equality Act 2010 when implementing this policy and procedures.

6.2 We will not discriminate on the grounds of any protected characteristic when implementing this policy.

7. Policy review

7.1 This policy and associated procedures will be reviewed periodically or more frequently if required to accommodate amendments to legislation or good practice.

8. Quality assurance and performance monitoring

8.1 There are a number of arrangements in place to ensure that incidents of abuse are effectively managed and that we are fulfilling our corporate and legislative duties.

8.2 The following measures will be used to gauge how well we are performing in our adult safeguarding duties:

1. Number of ‘alerts’ raised.
2. Number of referrals where no further action is required.
3. Number of referrals passed to other agencies (including NCC Safeguarding team, City Care, etc.).
4. Outcome of referrals passed to other agencies and lessons learnt.
9. Definitions

9.1 Vulnerable adult – there is no statutory definition of a vulnerable adult. Nottingham City Council (NCC) Vulnerable Adults Plan 2011-2014 (consultative document) defines a vulnerable adult as:

A citizen aged over 18 who:

1. requires health, social care and other support services; and
2. has lost, or is at risk of losing, his/her independence; and/or
3. is currently, or is at risk of being, socially excluded, abused, neglected or exploited.

NCC feels this definition “encompasses the broad spectrum of need of all vulnerable adults in the city”.

NCH will also use this definition to define a vulnerable adult.

9.2 Nottingham City Council Adult Safeguarding procedures¹ state that adult safeguarding duties will apply to ‘Adults at risk’ and this terminology is used throughout their procedures. Adults at risk are identified as anyone who:

1. Has needs for care and support (whether or not the authority is meeting any of those needs).
2. Is experiencing, or is at risk of abuse or neglect, and
3. As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

9.3 The adult’s care and support needs should arise from, or be related to a physical or mental impairment or illness. However, they do not need to meet the minimum eligibility criteria set out in Chapter 6 of the Care and Support Statutory Guidance, issued under the Care Act 2014. That is:

1. The care and support needs do not need to have arisen from a mental or physical impairment or illness.
2. The adult may still be able to carry out basic care activities (such as eating and drinking, maintaining personal hygiene, cooking etc.), maintain family or other personal relationships, access and engage in work and training, access recreational facilities, caring out caring responsibilities for others (e.g. parent); and
3. Where the adult is adversely affected by 1 or 2 this is having a significant impact on their wellbeing.
9.4 **Vulnerable Child or Young Person** - Nottingham City Council define a Vulnerable Child or Young Person can be defined as being "under the age of 18" and subject of significant harm where there is ill treatment or impairment of health or development:

- 'Ill-treatment' includes sexual and emotional abuse as well as physical abuse.
- 'Health' includes physical and mental health.
- 'Development' includes physical, intellectual, emotional, social and behavioural development.
- 'Significant Harm' turns on the question of the harm suffered by a child in respect of its health and development compared with the health and development reasonably expected of another child. (Sec. 31(10) Child Act 1989).

9.5 **Abuse** – is a violation of an individual’s human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal, or psychological, it may be an act of neglect or an omission to act, or it may occur when a person with care and support needs is persuaded to enter into financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.¹

a. **Adult safeguarding** – is the process to protect adults with care and support needs from abuse or neglect. This may include empowering and enabling people to protect themselves².

b. **Domestic abuse** – the cross-government definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. The abuse can encompass but is not limited to:

- Psychological abuse.
- Physical abuse.
- Sexual abuse.
- Financial abuse.
- Emotional abuse³.

² Department of Health (2013b) Fact Sheet 7 The Care Bill – Protecting adults from abuse or neglect
c. **Mate-crime** – is when people are befriended or groomed for exploitation and abuse.

d. **Serious Case Reviews** – are performed when there are major concerns about adult protection and/or system failures that have resulted in people not being cared for or safeguarded adequately. They are held in order to determine what went wrong and what lessons may be learned about the way in which staff and agencies work together to safeguard people at risk of harm.  

e. **Where does abuse take place?**

Abuse can take place anywhere including:

- In a person’s home.
- In the homes of family and friends.
- In public places/the community.
- Places of work.
- Educational facilities (e.g. colleges, further education).

Abuse may result from a deliberate intention to cause harm but may also occur where a provider of a service lacks the necessary knowledge or skills to respond to an individual's needs appropriately. Abusive behaviour between an NCH employee and a vulnerable service user will always be investigated under the code of conduct and could possible require more serious action.

f. **Perpetrators of Abuse**

Anyone can be a perpetrator of abuse. Abuse can occur in any relationship. An individual, group or organisation may perpetrate abuse.

An abusive relationship often includes the misuse of power by one person over another and is most likely to occur where one person has power over the other. Examples include, a carer and a dependent, a professional and a service user, a man and a woman, and a person belonging to a dominant race/culture.

g. **Mental capacity**

We recognise that capacity and consent are central themes, particularly in adult safeguarding work and that every adult has the right to make their own decisions. A person is assumed to have capacity unless it is proved that they do not.

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A referral will be made to Adult Services where there are concerns that a person being abused lacks mental capacity to do so unless it is proved that they do not.
What is being assessed:
Nottingham City Homes’ (NCH) Children, Young People and Vulnerable Adults Safeguarding Policy is being tested for its impact on Protected Characteristics, as defined in the Equality Act 2010. The aim of the policy is to embed a robust and consistent approach to safeguarding, that is aligned to and consistent with wider safeguarding approaches across Nottingham. The purpose of this policy and associated procedures is to protect and promote the welfare of the children, young people and vulnerable adults using or receiving NCH services.

Information we are using to analyse the effects on equality:
The impact of this Policy will be assessed as part of the monitoring, collation and reporting of KPIs. These will be assessed according to NCH’s equality and diversity profile, broken down by the following KPIs:

1. Number of safeguarding ‘alerts’ raised.
2. Number of referrals where no further action is required.
3. Number of referrals passed to other agencies (including NCC Safeguarding team, City Care, Independent Living Service etc.).
4. Outcome of referrals passed to other agencies and lessons learnt.

The policy has been subject to wide consultation within NCH, specifically; Tenancy and Estate Management, Independent Living Services, Income Management, Health and Safety, Lettings. The operational implementation of the Policy will ensure other relevant parts of NCH are consulted, including HR and Equalities and Diversity.

<table>
<thead>
<tr>
<th>Could particularly benefit (X)</th>
<th>May adversely impact (X)</th>
<th>How different groups could be affected - summary of issues identified</th>
<th>Details of actions to increase positive or reduce negative impact (or why action is not possible)</th>
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<tr>
<td>People from different ethnic groups.</td>
<td>☒</td>
<td>Ethnic groups - cultural and language awareness issues may need to be recognised and addressed. A reluctance to engage with official bodies by some ethnic groups may also prevent an awareness of and therefore increased risk of safeguarding</td>
<td>Ethnic Groups - Checking tenant details on Northgate to establish what preferred spoken language and method of contact is prior to contact. To ensure literature is available in other languages where required and to use plain English in our communications. To ensure any cultural practices are considered and incorporated into any training programme or when engaging on safeguarding issues.</td>
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<td>Men, women (including maternity/pregnancy impact), transgender people.</td>
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<tr>
<td><strong>Men, woman and transgender people</strong> – men and women can be impacted, but factors such as age, vulnerability, and disability have a bigger impact on individuals’ risks and safeguarding concerns.</td>
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<td>Women who are pregnant or who have recently given birth may feel more isolate and vulnerable and therefore be a higher risk group.</td>
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<td>Transgender people - data relating to our tenants who have undergone gender reassignment is unknown - maybe due to our tenants not wanting to disclose this information. However, they are recognised as a potential hate crime category and are therefore subject to greater risk.</td>
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<td>Disabled people or carers - checking tenant and household details on Northgate to identify the needs of the individual prior to making contact.</td>
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<td><strong>Disabled people or carers</strong> - Being a carer or having a physical disability mental health, social or behavioural issues may</td>
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<td>To use a translator where the need is identified.</td>
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<td>Work with a wide variety of faith groups and via links with the equality and diversity team to ensure an equitable application of the policy.</td>
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<tr>
<td>Clear procedures for reporting concerns and improved information sharing between agencies.</td>
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<tr>
<td>Men, woman and transgender people – Checking tenant and household details on Northgate to identify the needs of the individual prior to making contact.</td>
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<tr>
<td>Where there are any safeguarding concerns with regards to domestic abuse, children or vulnerable adults the service has a duty to act on the concerns and will do so in line with policy and procedure.</td>
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<td>Work with transgender support groups via links with the equality and diversity team to ensure an equitable application of the policy.</td>
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<td>Provide regular E&amp;D training, so staff are award of the needs of transgender groups and associated safeguarding risks.</td>
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<td>Clear procedures for reporting concerns and improved information sharing between agencies.</td>
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<tr>
<td>Disabled people or carers - checking tenant and household details on Northgate to identify any support worker and the needs of the individual prior to making contact.</td>
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<tr>
<td>People from different faith groups.</td>
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<td>Provide regular E&amp;D training, so staff are aware of the needs of disabilities, particularly mental health issues and any heightened safeguarding risks.</td>
<td>Work with disability rights and carer support groups via links with the equality and diversity team to ensure an equitable application of the policy.</td>
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<td></td>
<td>☑</td>
<td>Faith groups – the correlation between faith and ethnic groups means the way ethnic groups could be affected as described above, applies to some degree to faith groups.</td>
<td>Faith groups - provide regular E&amp;D training, so staff are aware of the needs of disabilities, particularly mental health issues and any heightened safeguarding risks. Work with faith groups’ representatives via links with the equality and diversity team to ensure an equitable application of the policy.</td>
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<td></td>
<td>☑</td>
<td>Some females from certain faith groups may have poor levels of safeguarding awareness and therefore be subject to greater risk.</td>
<td>Clear procedures for reporting concerns and improved information sharing between agencies.</td>
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<tr>
<td>Lesbian, gay or bisexual people.</td>
<td></td>
<td>Lesbian, gay or bisexual people - there may be a reluctance to engage due to perceived lack of understanding or fear. Offences against members of the LGBT community are recognised as a potential hate crime category and are therefore subject to greater risk and safeguarding concerns.</td>
<td>Lesbian, gay or bisexual people - provide regular E&amp;D training, so staff are aware of the needs of disabilities, particularly mental health issues and any heightened safeguarding risks. Work with LBGT groups internally and externally via links with the Equality and Diversity team to ensure an equitable application of the policy.</td>
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| Older or younger people. |  | Older or younger people - It is acknowledged that safeguarding issues have a particular impact for younger people and older adults.

Child sexual exploitation is increasingly a risk, as a result of organised individuals who target internet sites and social media used by children and young people.

In general awareness has been high in relation to children and young peoples’ issues. The Care Act 2014 underpins the need be vigilant in identifying and preventing harm to vulnerable adults. Particularly in relation to ‘mate hate’ crimes and the increased risk this poses as a result to changes as a result of Universal Credit.

We do gather data in respect of Forced Marriages but this is the only data gathering, it is identified as a protected characteristic in the policy. |
|  |  | Other (marriage/civil partnership, looked after children, cohesion/good relations, vulnerable children/adults). |
|  |  | Older or younger people - provide regular vulnerability training, so staff are aware of the needs of such groups, including heightened safeguarding risks.

Raised awareness and great transparency of the extent of problems as a result of Regular Tenancy Visits – visiting the most vulnerable and excluded tenants.

The opportunity to provide greater involvement of children in decisions that affect them.

Clear procedures for reporting concerns and improved information sharing between agencies. |
|  | Other – as above. | Other – as above. |
Outcome(s) of equality impact assessment:
- No major change needed [x]
- Adjust the policy/proposal/service [ ]
- Adverse impact but continue [ ]
- Stop and remove the policy/proposal [ ]

Arrangements for future monitoring of equality impact:
Information we are using to assess the impact of this policy has been set out above. This will be subject to a further review, following the implementation of the Safeguarding Procedure, to ensure monitoring is embedded in the framework monitoring our performance regarding safeguarding concerns.

Approved by (manager signature): Gez Kinsella
Tel: 07939 284002
E-mail: gez.kinsella@nottinghamcityhomes.org.uk

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