



Public Document Pack

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20 October 2020

HOUSING & CUSTOMER SERVICES WORKING GROUP

A meeting of the Housing & Customer Services Working Group will be held virtually on **Thursday 5 November 2020 at 6.00 pm** and you are requested to attend.

Members: Councillors Bennett (Chairman), Mrs Pendleton (Vice-Chair), Bicknell, Mrs Cooper, Goodheart, Mrs Haywood, Hughes and Ms Thurston

PLEASE NOTE: *This meeting will be a 'virtual meeting' and any member of the press and public may listen-in and view the proceedings via a weblink which will be publicised on the Council website at least 24 hours before the meeting.*

Different meeting arrangements are in place for the period running from 4 April 2020 to 7 May 2021 from the provisions of the Coronavirus Act 2020 and the meeting regulations 2020, to allow formal 'virtual meetings'.

This Council's revised Rules of Procedures for 'virtual meetings' can be found by clicking on this link: <https://www.arun.gov.uk/constitution>

For further information on the items to be discussed, please contact: committees@arun.gov.uk

A G E N D A

1. **APOLOGIES FOR ABSENCE**

2. **DECLARATIONS OF INTEREST**

Members and Officers are reminded to make any declarations of pecuniary, personal and/or prejudicial interests that they may have in relation to items on this agenda and are reminded that they should re-declare their interest before consideration of the item or as soon as the interest becomes apparent.

Members and officer should make their declaration by stating:

- a) the application they have the interest in
- b) whether it is a pecuniary, personal and/or prejudicial
- c) the nature of the interest
- d) if it is a prejudicial or pecuniary interest, whether they will be exercising their right to speak to the application

3. **MINUTES**

(Pages 1 - 4)

To approve as a correct record the Minutes of the meeting of the Housing & Customer Services Working Group held on 21 July 2020.

4. **ITEMS NOT ON THE AGENDA THAT THE CHAIRMAN OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES**

5. **ADDITIONAL AND SELECTIVE LICENSING SCHEMES FOR HOUSES IN MULTIPLE OCCUPATION**

(Pages 5 - 24)

At the meeting of Full Council on 25 February 2020 a motion was received from the Liberal Democrat Group in accordance with Council procedure 14.1 and 14.2 which stated: -

“The Council is asked to support a request for officers to explore what options might exist for introducing further controls on the definition, number and quality of homes in Multiple Occupation and prepare appropriate reports for the relevant decision body of the Council”.

The report provides information and looks at the options to introduce an additional licensing scheme for houses in multiple occupation or a selective licensing scheme for the private rented sector as a means of addressing the quality of houses in multiple occupation. The advantages and disadvantages of these schemes are explored within the report and recommendations are made in relation to the most appropriate course of action.

6. **CUSTOMER SERVICES STRATEGY**

(Pages 25 - 44)

This report briefly reviews progress on the implementation of the new Customer Services Strategy. This follows a report taken to the working group in September 2019 which set out the process of implementation of the Strategy and how this would be embedded into the organisation.

The report presents the revised draft Strategy together with setting out the next steps prior to recommending the strategy to Cabinet and Full Council.

7. **WATER HYGIENE POLICY & MANAGEMENT PLAN**

(Pages 45 - 56)

This report seeks approval for the adoption of the Water Safety Policy in respect of Council housing stock.

Housing and Customer Services Working Group is asked to recommend to Cabinet:

- the adoption of the Water Safety Policy 2020
- to give delegated authority to the Group Head of Residential Services in conjunction with the Cabinet Member for Residential Services to make minor changes to the policy and plan

8. **GAS SAFETY POLICY & MANAGEMENT PLAN**

(Pages 57 - 64)

This report seeks approval for the adoption of the Gas Safety Policy in respect of Council housing stock.

Housing and Customer Services Working Group is asked to recommend to Cabinet:

- The adoption of the Gas Safety Policy October 2020
- To give delegated authority to the Group Head of Residential Services in conjunction with the Cabinet Member for Residential Services to make minor changes to the policy

9. **REPORT BACK FROM CABINET/FULL COUNCIL**

The recommendations that were put forward at the last meeting of the Working Group on 21 July 2020 were approved at the Full Council Meeting on 16 September 2020.

Minute 9 [Work Programme] which was to approve the Working Group's Work Programme for the remainder of the Municipal Year 2020/21 which he formally proposed. The recommendation was then seconded by Councillor Mrs Pendleton.

The Council

RESOLVED

That the Work Programme for the Housing & Customer Services Working Group for 2020/21 be approved.

10. **WORK PROGRAMME 2019/2020**

(Pages 65 - 66)

To review and consider any changes needed to the approved work programme for 2020/21.

Note : Reports are attached for all Members of the Working Group only and the press (excluding exempt items). Copies of reports can be obtained on request from the Committee Manager.

Note : Members are reminded that if they have any detailed questions would they please inform the Chairman and/or relevant Director in advance of the meeting.

Note : Filming, Photography and Recording at Council Meetings - The District Council supports the principles of openness and transparency in its decision making and permits filming, recording and the taking of photographs at its meetings that are open to the public. This meeting may therefore be recorded, filmed or broadcast by video or audio, by third parties. Arrangements for these activities should operate in accordance with guidelines agreed by the Council and as available via the following link – [Filming Policy](#)

Agenda Item 3

Subject to approval at the next Housing & Customer Services Working Group meeting

1

HOUSING & CUSTOMER SERVICES WORKING GROUP

21 July 2020 at 6.00 pm

Present: Councillors Bennett (Chairman), Mrs Pendleton (Vice-Chair), Mrs Cooper, Mrs Haywood, Hughes and Ms Thurston

Councillors Bicknell and Mrs Gregory were also in attendance for all or part of the meeting.

Apologies: None

1. DECLARATIONS OF INTEREST

No declarations of interest were made.

2. MINUTES

The Minutes of the meeting held on 6 February 2020 were approved as a correct record by the Working Group and will be signed by the Chairman as soon as practicably possible.

3. START TIMES

The Working Group

RESOLVED

That the start times of meetings for the remainder of 2019/20 be 6.00 p.m.

4. CUSTOMER SERVICES ANNUAL UPDATE

The Customer Services Manager introduced her report and gave the Working Group an overview of its detail for the last financial year. Arun Direct the Council's telephony service sees the team dealing with 10 different types of enquiries, for face to face customers the team provide a general enquiries service at both the Littlehampton Civic Office and Bognor Town Hall receptions as well as providing support for housing enquiries. Work is currently taking place on the customer access strategy alongside the digital strategy as it is a key part of improving the Councils services for customers.

During the last year a total number of calls dealt with was 169,463 which was decrease on the previous year's figures. This was assumed to be due to the improvements in the online self-serve services. A total of 37,620 customers visited reception services at both the Civic Centre and Bognor Regis Town Hall. As a result of the Covid-19 pandemic the offices were closed, only allowing service for any person presenting as homeless. A review was now being completed of future access to services provided as a result of the closure. A high

Housing & Customer Services Working Group - 21.07.20

number of visits to the website showed that this method is by which, most customers access the Council services. In particular last year saw the Election pages have a significant increase from 43,187 in 2018/19 to 74,642 in 2019/20. This was due to the local Elections in May 2019 and the General Election in December 2019.

The Chairman thanked the team for the report and expressed thanks to the entire customer services teams for all their continued hard work.

The Working Group noted the report update.

5. FIRE POLICY & MANAGEMENT PLAN

The Repairs and Maintenance Manager introduced his report to the Working Group. It was explained that a Fire Safety Policy and Management Plan had been compiled that would enable the Council to comply with regulations and manage fire risk for all its properties and it clearly sets out the Council's responsibilities and the responsibilities of any Council contractors.

There were questions raised regarding the 'Stay Put' policy and whether this was the best advice. It was explained that the strategy for escape was driven by the Fire risk assessments that had been completed which comprised of several different factors. It was also explained that there are Fire Doors in place to help stop/delay the spread of Fire.

The Working Group recommend to Cabinet that;

- 1) the Fire Safety Policy 2020 be adopted
- 2) the Fire Safety Management Plan 2020 be adopted
- 3) delegated authority be given to the Group Head of Residential Services in conjunction with the Cabinet Member for Residential Services to make minor changes to the policy and plan

6. VOID LETTABLE STANDARD 2020

The Repairs and Maintenance Manger introduced his report to the Working Group. It was explained that the standard enables the Council to comply with health and safety and security requirements, it provides clarity to contractors on the expected performance from them and provides value for money.

The Working Group recommend to Cabinet that;

- 1) the Void Lettable Standard 2020 be adopted
- 2) delegated authority be given to the Group Head of Residential Services in conjunction with the Cabinet Member for Residential Services to make minor changes to the standard

7. HEALTH & SAFETY UPDATE

The Group Head of Residential Services introduced her report to the Working Group. She explained that the update set out the progress being made against in respect of health and safety compliance.

Members will remember that in 2018 it was determined by the regulator that the Council could not demonstrate that it could meet its statutory duties. An improvement plan was implemented, and highlighted four major themes that needed attention;

- 1) Systems – systematic approach to health and safety
- 2) Policy and procedures
- 3) Data – is it robust
- 4) Performance monitoring

For the last 18 months the Council had been providing monthly updates to the regulator and it will continue to do so. In respect of the progress that had been made, you see from the report that the Council is making significant progress to ensure that we are on the road to full compliance, from implementation of a new centralised data system to enable improved reporting, to the ongoing restructure of the housing service, additionally the Council had now mobilised contracts across all 7 disciplines in respect of Health and Safety regulations.

The Working Group asked several questions in relation to when it would be expected that the regulator would deem the Council as compliant and therefore no need to report to them so frequently. It was explained that currently the expectation based on the current progress made and the independent review suggest that it would be August 2021, the Council would be in a position to sign off with the regulator.

There was also concern raised in relation to any special provisions to be made for properties with multiple occupation/sheltered housing schemes and the communal areas that were closed due to Covid-19 pandemic and Government restrictions that were put in place. It was explained that the plan now, in line with the easing of Government restrictions was that these facilities were being phased back in.

The Working Group congratulated the Group Head of Residential Services for her team's dedication and hard work particularly throughout this pandemic.

The Working Group noted the report update.

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8. REPORT BACK FROM CABINET/FULL COUNCIL

The Chairman referred Members to the Agenda sheet for this item, and asked Members to note the recommendations put forward by the Working Group, in its last meeting on 6 February 2020 to the Cabinet. At the Cabinet meeting on 9 March 2020 these were all approved.

9. WORK PROGRAMME 2020/2021

The Group Head of Neighbourhood Services presented the Work Programme for 2019/20 to members.

The Working Group

RECOMMEND TO FULL COUNCIL

That the Housing & Customer Services Working Group Work Programme for 2019/20 be approved.

(The meeting concluded at 6.30 pm)

AGENDA ITEM NO.

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF HOUSING AND CUSTOMER SERVICES WORKING GROUP ON 22 OCTOBER 2020

PART A : REPORT

SUBJECT: Options for introducing further controls on the quality of Houses in Multiple Occupation: Additional or Selective Licensing Regimes

REPORT AUTHOR: Nat Slade, Group Head of Technical Services
DATE: 27 August 2020
EXTN: 37683
PORTFOLIO AREA: Technical Services

EXECUTIVE SUMMARY:

At the meeting of Full Council on 25 February 2020 a motion was received from the Liberal Democrat Group in accordance with Council procedure 14.1 and 14.2 which stated: -

“The Council is asked to support a request for officers to explore what options might exist for introducing further controls on the definition, number and quality of homes in Multiple Occupation and prepare appropriate reports for the relevant decision body of the Council”.

The report provides information and looks at the options to introduce an additional licensing scheme for houses in multiple occupation or a selective licensing scheme for the private rented sector as a means of addressing the quality of houses in multiple occupation. The advantages and disadvantages of these schemes are explored within the report and recommendations are made in relation to the most appropriate course of action.

RECOMMENDATIONS:

Members are requested to recommend to Cabinet:

1. To agree that officers continue to research and gather further evidence to help support whether additional HMO licensing (Housing Act 2004, s.56-60) or selective licensing of the private rented sector (Housing Act 2004, s.80-84) is justified.
2. To approve a supplementary estimate of up to £20,000 (which equates to a band D equivalent of £0.32) to commission the services and expertise to undertake the appropriate research and collation of data in order to support whether additional HMO Licensing or selective licensing of the private rented sector is justified.

1. BACKGROUND:

- 1.1 At the meeting of Full Council on 25 February 2020 a motion was received from the Liberal Democrat Group in accordance with Council procedure 14.1 and 14.2 which

stated: -

“The Council is asked to support a request for officers to explore what options might exist for introducing further controls on the definition, number and quality of homes in Multiple Occupation and prepare appropriate reports for the relevant decision body of the Council”

- 1.2 In response to this motion Planning Policy will be presenting a report to Development Control Committee, likely to be on 28 October 2020, recommending that further robust evidence is obtained before determining whether there is a case for introducing an Article 4 direction which would assist in controlling the number of Houses in Multiple Occupation in an area.
- 1.3 This report seeks to explore the options for further controls to deal with the quality of Houses in Multiple Occupation within the district as requested by the motion.
- 1.4 The private rented sector is an important part of our housing market and Houses in Multiple Occupation (HMOs) form a vital part of this sector, often providing cheaper accommodation for people whose housing options are limited. Some HMOs are occupied by the most vulnerable people in our society. These people live in properties, many of which were not built for multiple occupation, where the risk of overcrowding and fire can be greater than with other types of accommodation.
- 1.5 The meaning of house in multiple occupation is defined in the Housing Act 2004 sections 254 – 257 and can apply to:
 - An entire house or flat which is let to 3 or more tenants who form 2 or more households and who share a kitchen, bathroom or toilet.
 - A house which has been converted entirely into bedsits or other non-self-contained accommodation and fit the above criteria.
 - A converted house which contains one or more flats which are not wholly self-contained and is occupied by 3 or more tenants forming 2 or more households.
 - A building which is converted entirely into self-contained flats if the conversion did not meet the standards of the 1991 Building Regulations and more than 1/3 of the flats are let on short-term tenancies.
 - The property must be the tenants’ only or main residence and should be used solely or mainly to house tenants. Properties let to students and migrant workers will be treated as their only or main residence, and the same will apply to properties which are used as domestic refuges.
- 1.6 Mandatory licensing of HMOs came into force in 2006 and originally applied to properties of three storeys or more with five or more people making up two or more separate households living in them. Landlords of these properties are required to apply to the council for a licence, pay a locally set fee to cover the cost of administering the regime and the property must meet minimum standards which include, room sizes, provision of amenities (bathroom and kitchens), gas, electrical and fire safety for example and the landlord must be a fit and proper to hold the licence.
- 1.7 Upon receipt of a complete application an inspection will be carried out to ensure the required minimum standards are being met. Where works are identified these will be included as part of the conditions of the licence and the landlord will be given timescales for their completion. The council determines if a landlord is fit and proper

by means of self certification on the application form and the proposed licence holder declares that they have no unspent convictions or have any civil or criminal judgements against them in relation to housing, tenancy or public health related matters.

- 1.8 Before issuing a license, the local authority must legally send a draft copy of the licence to all interested parties for example, owner, leaseholder, mortgage company, agent etc providing a consultation period of 14 days and any representations must be considered by the council. After this period the licence can be issued and any conditions will be monitored to ensure they are completed and fulfilled, therefore follow up inspections will be carried out by officers. Licences are issued for a maximum period of 5 years, if the property meets all the required minimum standards then a further inspection will not be undertaken until renewal of the licence, unless a complaint is received that requires investigation. Under this scheme the council had 90 licensed HMOs.
- 1.9 With the rise in house prices many people are unable to afford their own home and therefore there has been an increase in the private rented sector over the last decade which in turn has seen an expansion of the HMO market and in it is now not uncommon for flats, and single and two storey houses, originally designed for families to be let as HMOs. Many are managed to a good standard by reputable landlords, but unfortunately this is not always the case. The government therefore introduced The Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018 on 1st October 2018 which removed the storey requirement as part of the definition for those properties required to be licensed under the mandatory scheme.
- 1.10 The aim was to remove the uncertainty particularly in high risk, intensely occupied HMOs, by creating a level playing field between landlords so rogue landlords cease to be able to operate substandard accommodation for maximum profit. This resulted in any property with five or more people making up two or more separate households requiring a licence. Officers believe that under the new definition there are approximately 300 licensable HMOs within the district, i.e. that an additional 200 HMOs fall within the licensing regime due to this change. This figure has been supported by the recent private sector housing stock modelling undertaken by the Building Research Establishment (BRE). The Council currently has 161 licences either granted or in progress. It is therefore expected that there are still a significant number of HMOs which remain unlicensed and it will require proactive action and potentially enforcement by officers to ensure these properties have the required licence.
- 1.11 HMO licensing is the only proactive private sector housing standards compliance work undertaken by the Private Sector Housing and Public Health Team. The regulation of the sector is restricted to investigating complaints received by the Council and officers working in a reactive way, rather than a planned and managed format. Enforcement is through the Housing Health and Safety Rating System (HHSRS). This is complex and designed for individual properties rather than area wide action and it can be time consuming.
- 1.12 One of the failings of this approach is that it must be acknowledged that many tenants, particularly the more economically disadvantaged and vulnerable will perceive a risk in complaining about the condition of their home and may be deterred from complaining due to the fear of retaliatory eviction. There is therefore

likely to be under-reporting of deficiencies in the quality of private rented sector housing. Introducing licensing has the effect that it is the responsibility of the landlord or freeholder to apply to be licensed and make any required improvements to their properties.

- 1.13 The Housing Act 2004 gives Local Authorities the power to introduce additional licensing schemes for HMOs or selective licensing schemes for the private rented sector to assist with additional controls to tackle specific issues that may be prevalent in certain wards or the entire district. The following sections explain the two schemes in more detail.

Additional Licensing of HMOs

- 1.14 This type of scheme applies where a local authority has evidence that a significant proportion of the HMOs in its area are being managed sufficiently ineffectively as to give rise, or to be likely to give rise, to one or more particular problems either for those occupying the HMOs or for members of the public.
- 1.15 Properties falling within this additional licensing regime could include properties occupied by 3 or 4 people living together as 2 or more separate households, self-contained flat or converted building. An additional HMO licence could also be required for any purpose-built self-contained flat, which is in a block of 3 or more self-contained flats.
- 1.16 The scope of the additional HMO licensing regime could also include any building that has been converted into and which consists entirely of self-contained flats, less than two-thirds of which are owner-occupied, and where the building works to convert the property into self-contained flats did not meet and still do not meet appropriate building standards. Such properties are known as Section 257 HMOs.
- 1.17 The benefits of introducing this scheme would mean that additional properties would be brought within the scope of a proactive inspection regime i.e. required to obtain a licence, therefore the process as described above for the mandatory licensing would apply i.e. meeting minimum standards, provision of an application form, fee and certificates and the fit and proper person assessment. This would ensure a greater proportion of the private rented sector housing stock is inspected to and regulatory steps are undertaken to ensure they meet the minimum standards. This regulatory activity would be resourced from the licence fees set by the Local Authority and levied on the landlords.
- 1.18 Before introducing such a scheme the local authority is required to undertake a 10-week meaningful consultation with those likely to be affected and also includes those who live, work or operate a business in adjoining local authority areas where they will be affected. Consideration must be given to any representation made in accordance with the consultation.
- 1.19 The consultation should be informative, clear and to the point, so the proposal is readily understood. It should inform local residents, landlords, letting agents and businesses about the proposed designation, giving the reasons for proposing it, why alternative remedies are insufficient, demonstrating how it will tackle specific problems together with other specified measures, and describing the proposed outcome of the designation. It should also set out the proposed fee structure and level of fees the authority is minded to charge (if any). Consultees should be invited to give their views, and these should all be considered and responded to.

- 1.20 The Department of Communities and Local Government (DCLG) paper, 'Approval steps for additional and selective licensing designations in England' (Revised February 2010) gives examples of properties being managed sufficiently ineffectively, and these include:
- Those whose external condition and curtilage adversely impact upon the general character and amenity of the area in which they are located
 - Those whose internal conditions (e.g. Poor amenities, overcrowding etc) adversely impact the health and safety and welfare of the occupiers and the landlords of those properties are failing to take appropriate steps to address the issues
 - Those where there is significant and persistent problem of anti-social behaviour affecting other residents and/or the local community and the landlords of the HMOs are not taking reasonable and lawful steps to eliminate or reduce the problems
 - Those where the lack of management or poor management skills or practices are otherwise adversely impacting upon the health, safety and welfare of the residents and/or impacting upon the wider community.
- 1.21 Once the consultation has been completed the results should then be published and made available to the local community. This should be in the form of a summary of the responses received and should demonstrate how these have either been acted on or not, giving reasons.
- 1.22 Following this 10-week consultation period the proposed scheme can then come into force no earlier than 3 months after and will be in operation for a maximum of 5 years.
- 1.23 This type of scheme requires landlords who own a HMO that falls within the additional licensing scheme to obtain a licence from the council, therefore putting the emphasis on the landlord to licence rather than relying on tenants to make complaints about the conditions with their property. It is a criminal offence to operate a licensable HMO without a valid licence and landlords may face prosecution, receive a Civil Penalty Notice or a reduced licensing period in consequence of any breach found. With the mandatory scheme linking the requirement to five persons sharing it has been noted that a number of landlords are reducing their occupancy to 4 or less to avoid licensing. The properties would still be required to meet minimum standards, but the Council is unable to enforce additional controls through the licensing regime. Nor would the Council currently check if minimum standards are being met in properties that fall outside of the mandatory HMO licensing regime, except when investigating complaints.
- 1.24 A licence may include such conditions as the local authority consider appropriate for regulating all or any of the following:
- The management, use and occupation of the house concerned, and
 - Its condition and content
- 1.25 Examples of this could include:
- Conditions imposing restrictions or prohibitions on the use or occupation of parts of the house

- Conditions requiring reasonable steps to prevent or reduce anti-social behaviour by persons visiting or occupying the house
- Conditions requiring facilities and equipment to meet minimum standards
- Conditions requiring facilities and equipment to be kept in repair and proper working order.
- Conditions requiring the licence holder or the manager of the house to attend training courses in relation to management of the HMO.

1.26 The licensing regime provides for a means by which a single party takes responsibility for the property and to ensure that it is managed effectively.

1.27 Using the recent private sector housing modelling data obtained from the BRE, Table 1 below illustrates the housing stock across the district with approximately 1329 HMOs which is 9% of the total housing stock and 280 of these HMOs are licensable under the Governments mandatory scheme.

Table 1 – District Wide Housing Stock Type

Tenure	Dwelling Total
All Stock	74,388
Owner Occupied	53,130
Social	6,835
Private Rented	14,423
Houses in Multiple Occupation	1,329
Licensable Houses in Multiple Occupation (Mandatory Scheme)	280

1.28 The BRE data also identifies via modelling whether there are likely to be poor conditions, this is identified by whether a category 1 hazard as defined by the Housing Health and Safety Rating System is present, there is a fuel poverty indicator or there is disrepair. Table 2 shows this data specifically for HMOs.

1.29 The BRE model their data based on information from Experian, Ordnance Survey, Energy Performance Certificates, English House Survey and tenancy deposit scheme information. Therefore, using statistical models, they are able to predict on the basis of probabilities the different types of dwellings and the conditions. The more information that can be provided for the analysis the greater the accuracy, unfortunately due to the time constraints for the recent stock modelling project the council was unable to provide HMO data or council tax information which may have assisted in greater accuracy and detail of information provided.

Table 2. BRE Data - HMO Stock Condition

Type of Condition Identified	Number of HMOs	Percentage of HMO Stock
Category 1 Hazard as defined by the Housing Health & Safety Rating System	129	9.7%
Fuel Poverty Indicator	327	24.6%
Disrepair	19	1.4%

1.30 This data indicates that there is not a high percentage of poor conditions within the HMO stock.

1.31 Based on this initial information it is considered that there would not be sufficient data to robustly justify the poor conditions criteria for the additional HMO licensing scheme without further in-depth investigation and analysis.

Finances and Resources

1.32 With any licensing scheme fees can be charged to cover the cost of administering the scheme. An analysis of the current mandatory licensing regime has been undertaken to ensure the Council has used a clear evidence base to set fees in order to fully recover the allowable costs it incurs in regulating these properties. A similar review would be required if an additional licensing scheme was implemented and this would also form part of the consultation process. Additional resources would be required in order to administer any scheme which would potentially require 1FTE Team Leader position (Scale 11/MG3), 2 FTE HMO Officer/Environmental Health Officer (Scale 8/SO2) and 0.5FTE Technical Support Assistant post (Scale 4). Fees are currently set on a sliding scale based on the number of occupants, however, across 1000 extra properties this would equate for a 3-4 person HMO to a 5-year license fee of something in the region of £1000.

1.33 Officers have found with the existing mandatory scheme that there are potentially more HMOs within the district than have currently been licensed, therefore this increases the proactive work officers are required to undertake to identify these properties and also the enforcement work involved in ensuring licences are obtained. Therefore, it should be acknowledged that some of the initial work in identifying licensable HMOs will not be cost recoverable.

1.34 Additionally, when HMOs are licensed most will have conditions attached in relation to works that are required to bring the properties up to minimum standards. Licence holders are given timescales in which to carry out these works, and officers will monitor to ensure they are completed, this in turn has an impact on the officer's time.

1.35 In view of this it is important that any licensing scheme has sufficient resources to ensure that it can be implemented and enforced effectively.

Selective Licensing in the private rented sector

1.36 The Housing Act 2004 also introduced the power for Local Authorities to introduce

selective licensing of privately rented homes in order to tackle problems in their area or any parts or parts of them, caused by low housing demand, significant anti-social behaviour, poor property conditions, an influx of migration, high level of deprivation or high levels of crime. It must therefore be emphasised that this type of scheme differs from additional licensing in that it would require any private rented accommodation within a specified area to be licensed and is not specific only to HMOs.

1.37 With effect from 1 April 2015, the “Housing Act 2004: Licensing of Houses in Multiple Occupation and Selective Licensing of Other Residential Accommodation (England) General Approval” came into force. This requires local authorities to obtain confirmation from the Secretary of State to introduce any selective licensing scheme which would cover more than 20% of their geographical area or would affect more than 20% of privately rented homes in the local authority area.

1.38 Selective licences are required for houses within the designated area where the whole of the house is occupied either under a single tenancy or licence or under two or more tenancies or licences in respect of different dwellings contained in it. There are a number of exemptions to the Selective Licensing regime as follows (as well as for business tenancies):

- A tenancy or licence is exempt from the selective licensing if it is granted by a registered social landlord;
- A prohibition order is in force;
- Agricultural tenancies;
- The property is managed/controlled by a local housing authority or public body;
- The building is regulated under other legislation (e.g. care homes);
- The building is occupied by students controlled/managed by a University/College (who subscribe to an Approved Code of Practice);
- The occupier is a Member Of The Family of the landlord/licensor who himself holds under a lease of the property for a minimum of 21 years;
- Holiday lets;
- The occupier shares any amenity (i.e. a toilet bathroom kitchen or living room) with the landlord/licensor or a Member Of The Family of the landlord/licensor

1.39 Generally, the same rules apply when granting a Selective Licence as with a mandatory HMO licence. The main differences are that

- It is mandatory to take up references for a prospective tenant before letting a property subject to Selective Licensing; and
- Unlike HMOs the licensing authority does not have to consider suitability for letting or amenity standards when granting a selective licence. However, the licence holder must still be a fit and proper person.

1.40 There are currently approximately 43 Selective Licensing areas in England, mostly in the larger cities such as London, Manchester, Nottingham, Leeds, Newcastle, etc., and locally in Brighton & Hove and Hastings most of which suffer from

traditionally poor housing stock and high levels of anti-social behaviour. (These cities/towns do not necessarily have Selective Licensing across the entire location with some only targeting particular areas).

1.41 The Government guidance on selective licensing states that when considering whether to make a selective licensing designation a local authority must first identify the objective or objectives that a designation will help to achieve. In other words it must identify whether the area is suffering problems that are caused by or are attributable to any of the criteria for making the designation and what it expects the designation to achieve, for example, an improvement in property conditions in the designated area.

1.42 Using the data from the BRE private sector housing stock modelling Arun District has 19% of the housing stock is privately rented which is the same as the national average. The condition of this stock is broken down in Table 3 below.

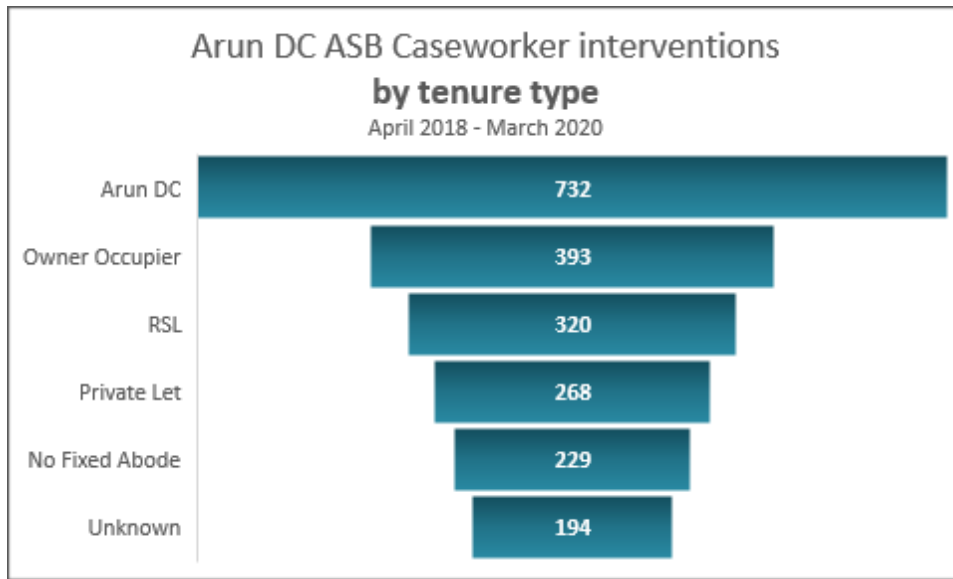
Table 3: BRE Data – Private Rented Dwellings Stock Condition

Type of Condition Identified	Number of Private Rented Dwellings	Percentage of Private Rented Stock
Category 1 Hazard as defined by the Housing Health & Safety Rating System	1110	7.7%
Fuel Poverty Indicator	2358	16.3%
Disrepair	535	3.7%

1.43 Officers from Community Safety would be supportive of introducing these schemes as it could assist with safeguarding and cuckooing cases where there is a high risk of harm. They also do not foresee a problem with sharing data to feed into any further projects to assist with creating some more accurate information.

1.44 Officers have provided data in relation to anti-social behaviour cases which can be split between tenure types e.g. Owner occupied, private lets etc. In relation to the private let data, without further analysis it is difficult to establish whether the cases are associated with HMOs or the wider private rented sector.

Table 4: Anti Social Behaviour Interventions



- 1.45 In relation to crime statistics the Police do not record property type, therefore the information that officers have access to would be crime levels in general and could identify ward hotspots over the previous year period, but would not specifically identify if this was in relation to HMOs/privately rented properties. Potential further analysis of this data in combination with other information may help to provide some more meaningful evidence.
- 1.46 Looking at the national picture more Local Authorities have opted for additional licensing of HMOs rather than Selective Licensing, as this enables poor conditions in HMOs to be tackled. Locally Brighton and Hove City Council and Hastings Borough Council have introduced these schemes, they have advised to ensure that evidence is significant and robust to assist with effective consultation and to not underestimate the amount of work this will involve.
- 1.47 In view of this further research would need to be undertaken to help determine if a consultation for additional HMO licensing or selective licensing of the private rented sector would be justified. The provision of additional datasets held by the council in regard to HMOs, Council Tax, Environmental Crime and Anti-Social Behaviour, an analysis could be undertaken against the various criterion for additional HMO licensing and selective licensing to identify if either of these schemes would be a justified. Initial enquiries have been made and an analysis of this type would cost in the region of £20,000.
- 1.48 Planning policy are also presenting a report to Development Control Committee, likely to be on 28 October 2020, recommending that further robust evidence is obtained before determining whether there is cause for introducing an Article 4 direction which would assist in controlling the number of Houses in Multiple Occupation in an area. Therefore, there is an opportunity to jointly commission a report that would support both areas and share the costs involved.

2. PROPOSALS:

Members are requested to recommend to Cabinet:			
2.1	To agree that officers continue to research and gather further evidence to help support whether additional HMO licensing (Housing Act 2004, s.56-60) or selective licensing of the private rented sector (Housing Act 2004, s.80-84) is justified.		
2.2	To agree a supplementary estimate of up to £20,000 (which equates to a band D equivalent of £0.32) to commission the services and expertise to undertake the appropriate research and collation of data in order to support whether additional HMO Licensing or selective licensing of the private rented sector is justified.		
3. OPTIONS:			
Other options available to Members:			
3.1	To agree no further action in regard to exploring whether additional HMO licensing or selective licensing of the private rented sector is justified. Officers would therefore continue to investigate complaints reactively rather than being able to proactively tackle the standard of accommodation through inspection.		
3.2	To employ additional staff to implement a proactive inspection regime without introducing additional HMO or selective licensing of the private rented sector. This approach would assist with tackling poor housing conditions, but without the creation of a licensing scheme enforcement powers are more restricted. This option would also require additional funding from the Council's general fund to recruit staff and unlike with a licensing scheme costs cannot be recovered through fees.		
4. CONSULTATION:			
Has consultation been undertaken with:		YES	NO
Relevant Town/Parish Council			
Relevant District Ward Councillors			
Other groups/persons (please specify) Finance, Legal, Community Safety, Residential Services, Planning		X	
5.	ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
	Financial	X	
	Legal	X	
	Human Rights/Equality Impact Assessment	X	
	Community Safety including Section 17 of Crime & Disorder Act		
	Sustainability		X
	Asset Management/Property/Land		X
	Technology		X
	Other (please explain)		X

6. IMPLICATIONS:

Financial:

The proposal is to continue to investigate for which £20,000 is required. Both potential licensing regimes would allow the Council to set fees to be levied on landlords of the licensed properties to recover the Council's costs in administering the licensing regime. See also paragraphs 1.32 & 1.33.

Legal:

Following further investigation, the Council may decide to propose the introduction of either licensing scheme, for a which a legally prescribed consultation process must be followed.

Equality:

No adverse impacts on protected characteristics have been identified, but a formal consultation on either licensing scheme would provide the opportunity for further consideration.

7. REASON FOR THE DECISION:

7.1 To improve the standard of accommodation in the private rented sector.

8. BACKGROUND PAPERS:

Equality Impact Analysis

Housing Act 2004 – Definition of House in Multiple Occupation

Equality Analysis for a Policy, Project or Report

What is the name of your policy, project, or report? Options for introducing further controls on the quality of Houses in Multiple Occupation: Additional or Selective Licensing Regimes	Month/Year August 2020
Name and job title of lead officer: Nat Slade Group Head of Technical Services	
<p>Briefly describe the aims of your policy, project, or report.</p> <p>At the meeting of Full Council on 25 February 2020 a motion was received from the Liberal Democrat Group in accordance with Council procedure 14.1 and 14.2 which stated: -</p> <p>“The Council is asked to support a request for officers to explore what options might exist for introducing further controls on the definition, number and quality of homes in Multiple Occupation and prepare appropriate reports for the relevant decision body of the Council</p> <p>The report provides information and looks at the options to introduce an additional licensing scheme for houses in multiple occupation or a selective licensing scheme for the private rented sector as a means of addressing the quality of houses in multiple occupation. The advantages and disadvantages of these schemes are explored within the report and recommendations are made in relation to the most appropriate course of action.</p>	

The Equality Act 2010 legally protects people from discrimination, both in the workplace and in wider society. It covers 9 specific groups of people who share 1 or more of these protected characteristics; age; disability; gender; gender reassignment; marriage & civil partnership; pregnancy & maternity; race; religion or belief; and sexual orientation.

As a local authority Arun District Council (and any other organisation that is carrying out a public function on our behalf) is further bound by the Public Sector Equality Duty. This means that we have to consider **all** individuals in their day-to-day work – in shaping policy, in delivering services and in relation to our own employees.

The Duty has three aims. It requires public bodies to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act.
- advance equality of opportunity between people who share a protected characteristic and people who do not share it – this means removing or minimising disadvantages suffered by people due to their protected characteristics and encouraging people with protected characteristics to participate in public life or in other activities where their participation is low.
- foster good relations between people who share a protected characteristic and people who do not share it – this involves tackling prejudice and promoting understanding.

Having due regard means consciously thinking about the three aims of the Equality Duty as part of the process of decision-making. This means that consideration of equality issues must influence the decisions reached by public bodies – such as in how they act as employers; how they develop, evaluate and review policy; how they design, deliver and evaluate services, and how they commission and procure from others.

The Equality Duty does not impose a legal requirement to conduct an Equality Impact Assessment. Compliance with the Duty involves consciously thinking about the three aims as part of the process of decision-making. Doing this will entail understanding the potential effects of the organisation’s activities on different people. Keeping a simple record of how decisions were reached will help public bodies show how they considered the Duty. Producing an Equality Impact Assessment after a decision has been reached will not achieve compliance with the Equality Duty.

Analysis

Consider what it is that you are trying to achieve and write a brief equality analysis in the box below. You should mention each of the nine protected groups, plus any others (e.g. families, people on low incomes, people in remote areas, etc) who may be affected. The following questions should help shape your thought process and subsequent decision making.

- Who will benefit most from this? Will anyone be treated more favourably as a result?
- Is there any evidence to suggest that your action or policy could have an adverse impact on some groups of people and specifically those with a protected characteristic? Does it present barriers or problems for any groups or communities?
- Is there any data, research or other evidence available to help or support your decisions?
- Have you considered any existing examples of good practice.
- How do you intend to deal with any adverse impact, or lessen it?
- Who else will you need to be working with to do this e.g. partners, contractors etc and what is their approach? How will this help?

The potential introduction of additional HMO licensing or selective licensing regimes is determined by the type of property and its condition but would take account of all the specific groups age; disability; gender; gender reassignment; marriage & civil partnership; pregnancy & maternity; race; religion or belief; and sexual orientation, whether they are the tenants of such properties, landlords or neighbouring residents.

If a decision is taken to introduce one of these licensing schemes, meaningful consultation is required as part of this process with those likely to be affected and also includes those who live, work or operate a business in adjoining local authority areas where they will be affected. Therefore there would be an opportunity to seek views and address any comments that may arise in regard to equalities or discrimination.

HOUSING ACT 2004

Meaning of “house in multiple occupation”

Section 254: Meaning of “house in multiple occupation”

(1) For the purposes of this Act a building or a part of a building is a “house in multiple occupation” if—

- (a) it meets the conditions in subsection (2) (“the standard test”);
- (b) it meets the conditions in subsection (3) (“the self-contained flat test”);
- (c) it meets the conditions in subsection (4) (“the converted building test”);
- (d) an HMO declaration is in force in respect of it under section 255; or
- (e) it is a converted block of flats to which section 257 applies.

(2) A building or a part of a building meets the standard test if—

- (a) it consists of one or more units of living accommodation not consisting of a self-contained flat or flats;
- (b) the living accommodation is occupied by persons who do not form a single household (see section 258);
- (c) the living accommodation is occupied by those persons as their only or main residence or they are to be treated as so occupying it (see section 259);
- (d) their occupation of the living accommodation constitutes the only use of that accommodation;
- (e) rents are payable or other consideration is to be provided in respect of at least one of those persons' occupation of the living accommodation; and
- (f) two or more of the households who occupy the living accommodation share one or more basic amenities or the living accommodation is lacking in one or more basic amenities.

(3) A part of a building meets the self-contained flat test if—

- (a) it consists of a self-contained flat; and
- (b) paragraphs (b) to (f) of subsection (2) apply (reading references to the living accommodation concerned as references to the flat).

(4) A building or a part of a building meets the converted building test if—

- (a) it is a converted building;
- (b) it contains one or more units of living accommodation that do not consist of a

self-contained flat or flats (whether or not it also contains any such flat or flats);

- (c) the living accommodation is occupied by persons who do not form a single household (see section 258);
- (d) the living accommodation is occupied by those persons as their only or main residence or they are to be treated as so occupying it (see section 259);
- (e) their occupation of the living accommodation constitutes the only use of that accommodation; and
- (f) rents are payable or other consideration is to be provided in respect of at least one of those persons' occupation of the living accommodation.

(5) But for any purposes of this Act (other than those of Part 1) a building or part of a building within subsection (1) is not a house in multiple occupation if it is listed in Schedule 14.

(6) The appropriate national authority may by regulations—

- (a) make such amendments of this section and sections 255 to 259 as the authority considers appropriate with a view to securing that any building or part of a building of a description specified in the regulations is or is not to be a house in multiple occupation for any specified purposes of this Act;
- (b) provide for such amendments to have effect also for the purposes of definitions in other enactments that operate by reference to this Act;
- (c) make such consequential amendments of any provision of this Act, or any other enactment, as the authority considers appropriate.

(7) Regulations under subsection (6) may frame any description by reference to any matters or circumstances whatever.

(8) In this section—

“basic amenities” means—

- (a) a toilet,
- (b) personal washing facilities, or
- (c) cooking facilities;

“converted building” means a building or part of a building consisting of living accommodation in which one or more units of such accommodation have been created since the building or part was constructed;

“enactment” includes an enactment comprised in subordinate legislation (within the meaning of the Interpretation Act 1978 (c. 30));

“self-contained flat” means a separate set of premises (whether or not on the same floor)—

- (a) which forms part of a building;
- (b) either the whole or a material part of which lies above or below some other part of the building; and
- (c) in which all three basic amenities are available for the exclusive use of its occupants.

Section 257: HMOs: certain converted blocks of flats

(1) For the purposes of this section a “converted block of flats” means a building or part of a building which—

- (a) has been converted into, and
- (b) consists of,
self-contained flats.

(2) This section applies to a converted block of flats if—

- (a) building work undertaken in connection with the conversion did not comply with the appropriate building standards and still does not comply with them; and
- (b) less than two-thirds of the self-contained flats are owner-occupied.

(3) In subsection (2) “appropriate building standards” means—

- (a) in the case of a converted block of flats—
 - (i) on which building work was completed before 1st June 1992 or which is dealt with by regulation 20 of the Building Regulations 1991 (S.I. 1991/2768), and
 - (ii) which would not have been exempt under those Regulations,
building standards equivalent to those imposed, in relation to a building or part of a building to which those Regulations applied, by those Regulations as they had effect on 1st June 1992; and
- (b) in the case of any other converted block of flats, the requirements imposed at the time in relation to it by regulations under section 1 of the Building Act 1984 (c. 55).

(4) For the purposes of subsection (2) a flat is “owner-occupied” if it is occupied—

- (a) by a person who has a lease of the flat which has been granted for a term of more than 21 years,
- (b) by a person who has the freehold estate in the converted block of flats, or

(c) by a member of the household of a person within paragraph (a) or (b).

(5) The fact that this section applies to a converted block of flats (with the result that it is a house in multiple occupation under section 254(1)(e)), does not affect the status of any flat in the block as a house in multiple occupation.

(6) In this section “self-contained flat” has the same meaning as in section 254.

Section 258: HMOs: persons not forming a single household

(1) This section sets out when persons are to be regarded as not forming a single household for the purposes of section 254.

(2) Persons are to be regarded as not forming a single household unless—

- (a) they are all members of the same family, or
- (b) their circumstances are circumstances of a description specified for the purposes of this section in regulations made by the appropriate national authority.

(3) For the purposes of subsection (2)(a) a person is a member of the same family as another person if—

- (a) those persons are married to [F5](#), or civil partners of, each other or live together as if they were a married couple or civil partners];
- (b) one of them is a relative of the other; or
- (c) one of them is, or is a relative of, one member of a couple and the other is a relative of the other member of the couple.

(4) For those purposes—

- (a) a “couple” means two persons who [F6](#)... fall within subsection (3)(a);
- (b) “relative” means parent, grandparent, child, grandchild, brother, sister, uncle, aunt, nephew, niece or cousin;
- (c) a relationship of the half-blood shall be treated as a relationship of the whole blood; and
- (d) the stepchild of a person shall be treated as his child.

(5) Regulations under subsection (2)(b) may, in particular, secure that a group of persons are to be regarded as forming a single household only where (as the regulations may require) each member of the group has a prescribed relationship, or at least one of a number of prescribed relationships, to any one or more of the others.

(6) In subsection (5) “prescribed relationship” means any relationship of a description specified in the regulations.

Section 259: HMOs: persons treated as occupying premises as only or main residence

(1) This section sets out when persons are to be treated for the purposes of section 254 as occupying a building or part of a building as their only or main residence.

(2) A person is to be treated as so occupying a building or part of a building if it is occupied by the person—

- (a) as the person’s residence for the purpose of undertaking a full-time course of further or higher education;
- (b) as a refuge, or
- (c) in any other circumstances which are circumstances of a description specified for the purposes of this section in regulations made by the appropriate national authority.

(3) In subsection (2)(b) “refuge” means a building or part of a building managed by a voluntary organisation and used wholly or mainly for the temporary accommodation of persons who have left their homes as a result of—

- (a) physical violence or mental abuse, or
- (b) threats of such violence or abuse,

from persons [who are or were their spouses or civil partners] or with whom they are or were co-habiting.

Section 260: HMOs: presumption that sole use condition or significant use condition is met

(1) Where a question arises in any proceedings as to whether either of the following is met in respect of a building or part of a building—

- (a) the sole use condition, or
- (b) the significant use condition,

it shall be presumed, for the purposes of the proceedings, that the condition is met unless the contrary is shown.

(2) In this section—

- (a) “the sole use condition” means the condition contained in—
 - (i) section 254(2)(d) (as it applies for the purposes of the standard test or the self-contained flat test), or

(ii) section 254(4)(e),

as the case may be; and

(b) “the significant use condition” means the condition contained in section 255(2) that the occupation of the living accommodation or flat referred to in that provision by persons who do not form a single household constitutes a significant use of that accommodation or flat.

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF THE HOUSING & CUSTOMER WORKING GROUP ON 22 OCTOBER 2020

PART A: REPORT

SUBJECT: Strategic direction of Customer Services – an update

REPORT AUTHOR: Joe Russell-Wells – Group Head of Neighbourhood Services

DATE: September 2020

EXTN: 37914

PORTFOLIO AREA: Neighbourhood Services

EXECUTIVE SUMMARY:

This report briefly reviews progress on the implementation of the new Customer Services Strategy. This follows a report taken to the working group in September 2019 which set out the process of implementation of the Strategy and how this would be embedded into the organisation.

The report presents the revised draft Strategy together with setting out the next steps prior to recommending the strategy to Cabinet and Full Council.

RECOMMENDATIONS:

Members are asked to note the report

1. BACKGROUND:

1.1. In September 2019 a report was taken to the Housing and Customer Services working group which briefly reviewed the Customer Access Strategy 2013-2017 noting the progress made against the Action Plan which formed part of the strategy.

1.2. The report also introduced a draft Customer Services Strategy together with a process of implementation. Emphasis of the importance of embedding the strategy was made in the report and a method of implementation was set out. This included workshops with various teams across the organisation.

1.3. This report reviews progress, in addition it identifies the impact of the Covid-19 pandemic. The Customer Services Annual Update – 2019-2020, taken to the July 2020 Housing and Customer Services working group, reviews the work of Customer Services and includes reference to the changes in working as a result of the pandemic.

2. THE DRAFT CUSTOMER SERVICES STRATEGY

2.1. Appendix 1 provides the updated draft strategy. This begins with the Council's 2020 Vision which continues to be relevant to providing the best starting point

where good customer services are concerned:

- Offering an improved customer experience
- Building better relationships with other organisations and the community
- Providing more digital opportunities to make dealing with us easier

2.2. The Strategy includes the following Vision which aims to address the Council's wider vision where customers are concerned.

2.3. Customer Services Vision

We aim to be a customer focused organisation – we will work to understand our customers better and put them at the heart of everything we do, and we will support customers to do more for themselves.

2.4. The Strategy is set out by a series of headings

- Aims and objectives
- Priorities, challenges and opportunities
- Community and partnership working
- What we will do, how and when

2.5. The Strategy introduces a Customer Charter which sets out what the customer can expect together with what the Council commits to.

2.6. A reoccurring theme within the Strategy is that ADC will strive to improve opportunity for customer feedback, and that our overall measure of success will be customer satisfaction with our services.

2.7. For the Customer Services Vision to become a reality every service area, and every member of staff in the Council, has a role and responsibility to play in providing the best quality for our customers. The Strategy will need to be further embedded into the culture of the organisation ensure that the vision is owned by all staff.

2.8. The Strategy will include an action plan, a living document, which will be regularly updated to ensure work progresses as organisational changes are needed.

3. DIGITAL SERVICES

3.1. Digital services for ADC customers play an increasingly important part, and this is identified within the Strategy. The Council's 2020 Vision states that this is an important strand of work by 'Providing more digital opportunities to make dealing with us easier'.

3.2. The council's main website www.arun.gov.uk, is under review with the aim to having more transactional services which are easier and quicker to access. The content is also planned to be refreshed to make it clearer and simpler to read, at the same time it will be assured the site meets the latest accessibility standards that are now mandated for public sector websites.

3.3. The ongoing pandemic has confirmed the importance of digital services. The face to face inquiries received by the Council are now being dealt with by telephone or via the Council's website. The trend in using digital services has increased over recent years (see the Customer Services Annual Update – 2019-2020 report July

2020), however it will be important to ensure access to services is maintained for those customers that don't have access to digital services.

3.4. The Customer Services Strategy will work alongside the development in digital technology which is a key part of improving the access of services to the public.

4. IMPLEMENTING THE STRATEGY

4.1. A series of workshops were set out as a way of implementing and embedding the strategy. Workshops with the Customer Services teams and for the Senior Management Team were successfully completed. However due to the Covid-19 pandemic the final workshop, planned to be held with staff and Members could not be held and due to the ongoing pandemic, it is unlikely this can be held in the near future. However, an alternative method as to how this could be done by digital means are being investigated.

4.2. The draft strategy is being consulted on within the organisation. A presentation on the draft was made at a Senior Management Team meeting and comments on the draft are being provided. The next step will be to take the Strategy to Cabinet in Spring 2020 with a recommendation for its adoption.

2. PROPOSAL(S):

To note the report

3. OPTIONS:

To note the report

4. CONSULTATION:

AS described in the report workshops with staff have taken place. A further workshop is planned.

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		No
Relevant District Ward Councillors		No
Other groups/persons (please specify)		No
5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial		No
Legal		No
Human Rights/Equality Impact Assessment		No
Community Safety including Section 17 of Crime & Disorder Act		No
Sustainability		No
Asset Management/Property/Land		No
Technology		No

Other (please explain)		No
6. IMPLICATIONS: Improvement of Customer Access to ADC services		

7. REASON FOR THE DECISION:
 To work towards implementing a new Customer Services Strategy

8. BACKGROUND PAPERS:
 Strategic direction of Customer Services - HCSWG September 2019
 The Customer Services Annual Update – 2019-2020 – HCSWG July 2020

Customer Services Strategy 2021 – 2026



24/7 SUPPORT



ASSISTANCE



CUSTOMER SERVICE



CONTACT US



The Council Priorities and the Vision



Your services

“Providing the best services we can afford to help you



Supporting you

to help you improve your life”



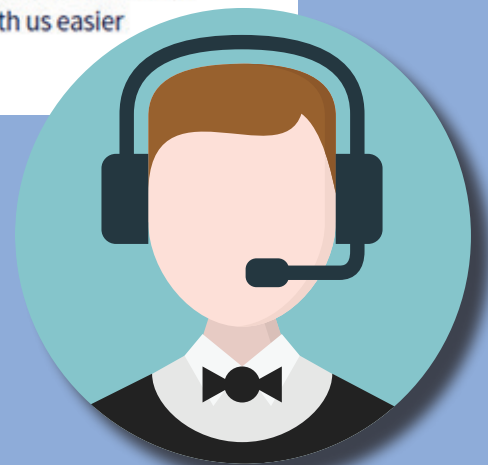
Your future

improve your life”

We will continue to deliver our priorities without it costing you more by:

- Offering an improved customer experience
- Building better relationships with other organisations and the community
- Providing more digital opportunities to make dealing with us easier
- Becoming smaller but more effective

The Customer Services Strategy aims to put customers first in everything that we do – the following pages sets out how we will do this, and what our customer should expect.



Customer Services Vision

We aim to be a customer focused organisation – we will work to understand our customers better and put them at the heart of everything we do, and we will support customers to do more for themselves.

This includes:

- encouraging all our staff to 'think customer' before acting
- invest in training for our staff to understand how to deliver the best customer care
- being committed to treating people fairly, to respect privacy and dignity and to pay attention to people who need more support
- making sure this continues to be an important part of our culture
- asking customers what they think and use their feedback to improve our services
- providing help and support for people across Arun following a wide range of inquiries, and understanding what customers need and use this to change our services.



Aims and objectives

We will:

- ask for feedback from customers about their experiences of dealing with us and use the results to learn from this to improve our services
- continue to develop online services that are easy to access using any device, quick to use and available whenever they are needed
- promote self-reliance; whilst continuing to support those who need our help
- talk to focus groups to understand and accommodate access needs
- measure how satisfied people are with our services, publish and learn from the results.

Priorities, challenges and opportunities

Our key challenges include:

Rising customer expectations and demands – customers expect to be able to contact us 24 hours a day, seven days a week using our website and social media. They expect flexible and more personalised services.

Using customer intelligence to inform and shape service delivery – we will use good information to understand what our customers need so that we can respond better.

Digital exclusion – we must allow for people who don't have access to the internet at home, and which may mean that they can't access our information and services online. Where needed we will help people who don't have access to the internet by providing support to use at venues across the District.

Reducing council resources – the need for us to provide high quality customer service does not go away as our funding reduces. We must develop more cost effective ways for our customers to contact us and encourage and support our customers to use them.

Workforce development – a training and development plan will be produced for customer services.

We will:

- invest in training for all our staff which will include equality awareness and data protection training
- include customer service awareness in our appraisal process.



Community and partnership working

Community engagement

We have a unique community leadership role among providers of public services, working with partners, local businesses, voluntary organisations and communities themselves to create positive conditions in the District.

We will strengthen partnership working, and work with communities to achieve the long-term wellbeing of people in the District. We will encourage residents to play a part in their communities and help them to do this where we can. We aim to be a trusted source of information, advice and guidance, using our website and other self-service options.

- get to know our communities better and improve the way we work with them
- improve the information available and access to it as easy as possible.

Partnership working

We work closely with partners across the District and beyond to make sure our customers get the right help and support. We will set out clearly how we share customer's information with our partners. We want our customers to be confident that we are protecting their privacy but also using important information effectively to make sure they get the help and support they need.

- work with partners to make it as convenient as we can for customers to get help and support
- keep personal information secure.

What we will do, how and when

We're committed to providing a range of customer contact options supported by clear information, advice and guidance.

We will continue to develop well-designed options which customers can use whenever they need to request a service, complete an application, make a payment or report an issue.

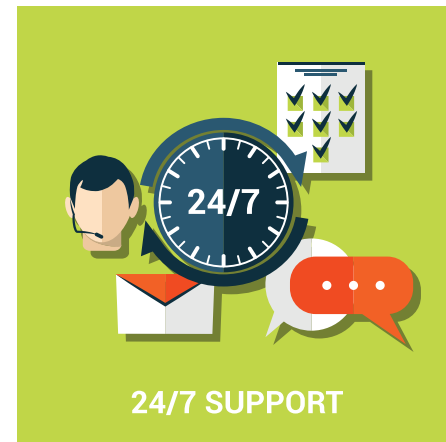
We will promote online options and help customers to use them by:

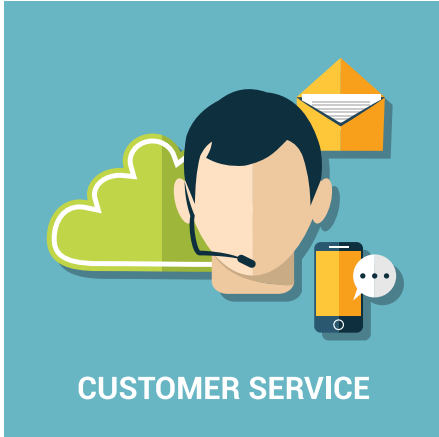
- investing in online options including our website, automatic telephone lines, SMS text, social media and mobile phone apps
- supporting the roll out of superfast broadband across the District to help more of our customers access the information they need and the services they want in the most convenient way
- providing equipment in a range of buildings and helping people to use it
- identifying and working with individuals or groups who need extra help to access services
- helping customers to access online options through live web chat and our telephone contact centre teams.

Aim to resolve enquiries first time around

To achieve this, we will invest in staff training and make sure staff have access to good information. Key actions will include:

- gathering feedback from customers to help us design our services better
- developing common standards of service for all contact





- publishing clear information, reducing the need for customers to contact us
- reducing the number of different telephone numbers we publish
- providing automatic telephone options for simple requests and enquiries.

Email and paper communication

We aim to reduce the amount of direct email, post and paper communication by increasing the range of services available on our website and increasing the ability of customers to self-serve. We will only use letters where essential.

Service standards

Our Strategy is a demonstration of our commitment to our customers. We aim to deliver a consistently good service whenever our customers contact us and strive for excellence in everything we do.

Customer Charter

Values – Getting it right - Going the extra mile

Customers can expect:

Our knowledgeable and committed staff to put your needs first.

To be kept well informed.

Staff who want to help, and are courteous and engaged.

A single point of contact, and resolution of your enquiry, with clear signposting of services.

The Council commits to:

All our staff being committed to putting your needs first.

Ensuring that all information is up-to-date and correct.

Make sure you are always delighted with the help and guidance we give you.

Being joined up and not passing you around the organisation.

Innovating - Learning from experience

Customers can expect:

Us to put things right when they go wrong.

To be consulted about changes to the services we provide.

For us to improve our services based on your feedback.

For us to constantly think about ways of improving everything we do.

The Council commits to:

Apologising if we make a mistake and fixing it quickly and fairly, and learning from our mistakes.

Making it easy for you to have your say in what we do and how we do it.

Using your feedback to make changes and removing any unnecessary bureaucracy.

Delivering continuous improvement and increased satisfaction.

Customer Charter

Spending wisely - Every penny counts

Customers can expect:

Information about what is being spent where and why.

Modern and responsive services based on what works for you.

That we continually look for ways of keeping costs down by becoming more efficient.

Simplified processes services.

The Council commits to:

Being transparent and publicising service performance, budgets and expenditure.

Constantly looking for ways to improve our services and save money.

Always looking for ways to save money.

Reducing the cost of a request through efficiencies.

Many talents – One aim

Customers can expect:

Knowledgeable teams who can help you when the unexpected happens.

A consistent standard of service, whichever part of the council you contact.

Us to do more when you need us most.

An integrated and seamless service.

The Council commits to:

Making sure we are here to help you quickly when things go wrong.

Ensuring that staff are clear about what is expected of them.

Working across the organisation to help you with any emergencies.

Having effective internal and external communication systems.

Customer Charter

Listening - Responding

Customers can expect:

Clarity about the services we offer and honesty about what we can and can't do.

A prompt response to resolve enquiries with committed service standards, be it by phone, in person or online.

To be treated with courtesy, respect and understanding.

To be involved in decisions which directly affect you.

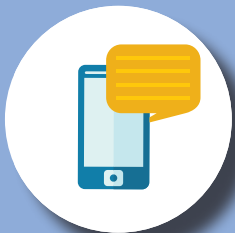
The Council commits to:

Keeping our promises by doing what we say, when we say.

Making sure your experience is as efficient and helpful as possible.

Understanding your needs, pressures and situation.

Providing you with choices where we can do so.



Response times to our customers

When customer contact us either by post or by email we will aim to respond within 10 working days and will aim to acknowledge receipt of your enquiry within 2 working days.

A full response or resolution, depending on the nature of your enquiry, may take longer. Customers will be given a timescale for a response with an acknowledgement.

Complaints – if a customer wants to make a complaint, they are able to do so via our complaints procedure, the full details of which can be accessed via our website: www.arun.gov.uk

In return we expect that you will:

- be respectful and polite to our staff
- be considerate of other customers
- use our online services if you can, and be willing to try new ways of contacting us
- keep us informed of personal changes which might affect the services we provide to you
- keep to agreed appointments or let us know if you need to change them
- provide us with feedback about your experiences to help us to learn and improve.

How will you know if we are improving?

We are determined to improve the service we offer our customers.

Our overall measure of success will be customer satisfaction with our services.

We will make sure that customers can contact us easily and make more services accessible online.

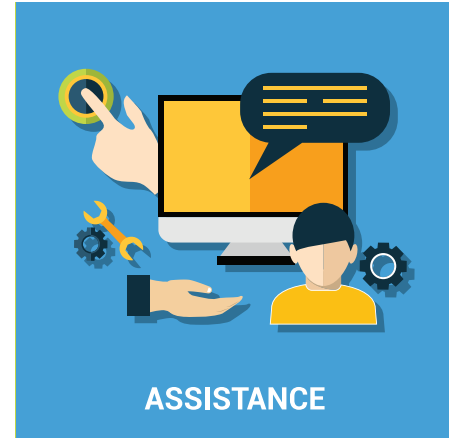
We will measure some customer contacts in detail, such as complaints and feedback, and how many customers use our online services and need to contact us.

We will:

- survey customers regarding satisfaction with our services
- ask customers for feedback as part of the way we work
- take advice from those who face the greatest difficulty in accessing services
- review the measures of success and the strategy every year
- report our progress every year and publish on our website.

We will work continuously to improve our customer services and have a detailed action plan in place to make sure we deliver efficiently and on time.

We will strive to ensure that improving customer service becomes part of the normal way we work.

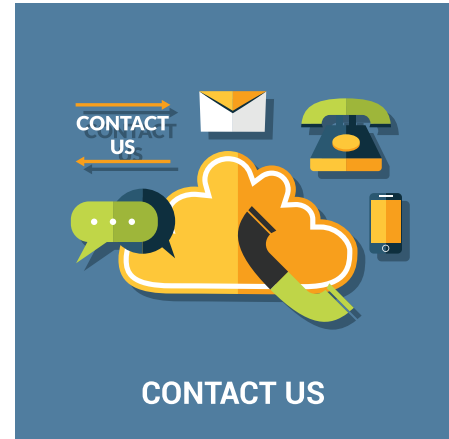


Action Plan

Available on our website at:

www.arun.gov.uk/

(this to be precis version of full plan).





Customer Services
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Littlehampton
West Sussex BN17 5LF

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ARUN DISTRICT COUNCIL

REPORT TO HOUSING AND CUSTOMER SERVICES WORKING GROUP ON 22 OCTOBER 2020

PART A : REPORT

SUBJECT:	Water Safety Policy
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REPORT AUTHOR:	Satnam Kaur, Group Head of Residential Services
DATE:	5 October 2020
EXTN:	37740
PORTFOLIO AREA:	Residential Services

EXECUTIVE SUMMARY:

This report seeks approval for the adoption of the Water Safety Policy in respect of Council housing stock.

RECOMMENDATIONS:

Housing and Customer Services Working Group is asked to recommend to Cabinet:

- the adoption of the Water Safety Policy 2020
- to give delegated authority to the Group Head of Residential Services in conjunction with the Cabinet Member for Residential Services to make minor changes to the policy and plan

1.0 BACKGROUND:

- 1.1 As a landlord of social housing Arun District Council is responsible for managing the maintenance and repairs of our housing stock and this includes managing water safety.
- 1.2 This policy outlines how we will comply with the Regulatory Framework for Social Housing in England as outlined below:
 - 1.2.1 Meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.
- 1.3 ADC, as the Duty Holder, has specific duties (amongst others) under the Control of Substances Hazardous to Health Regulations 2002 to:
 - 1.3.1 Carry out risk assessments and implement control measures
 - 1.3.2 Control exposure to harmful substances.
- 1.4 Legionellosis is a collective term for diseases caused by legionella bacteria including the most serious Legionnaires' disease. It also includes the similar but less serious conditions of Pontiac fever and Lochgoilhead fever. Legionnaires'

<p>disease is a potentially fatal form of pneumonia and everyone is susceptible to infection. The risk of infection increases with age, but some people are at higher risk such as;</p> <p>1.4.1 People over 45</p> <p>1.4.2 Smokers and heavy drinkers</p> <p>1.4.3 People suffering from chronic respiratory or kidney disease, diabetes, lung and heart disease, or anyone with an impaired immune system</p> <p>1.5 It is important to control the risks by introducing measures that do not allow proliferation of the organisms in the water systems and reduce, so far as is reasonably practicable, exposure to water droplets and aerosol. This will reduce the possibility of creating conditions in which the risk from exposure to legionella bacteria is increased</p>		
2.0 PROPOSAL(S):		
2.1 The Water Safety Policy to be approved so that responsible managers can implement this with contractors and staff.		
3.0 OPTIONS:		
3.1 There is no option other than to approve the policy to ensure we can manage water safety within our housing stock.		
4.0 CONSULTATION:		
Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		✓
Relevant District Ward Councillors		✓
Other groups/persons (please specify) Members of the Housing and Customer Services Working Group	✓	
5.0 ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial	✓	
Legal	✓	
Human Rights/Equality Impact Assessment		✓
Community Safety including Section 17 of Crime & Disorder Act		✓
Sustainability	✓	
Asset Management/Property/Land		✓

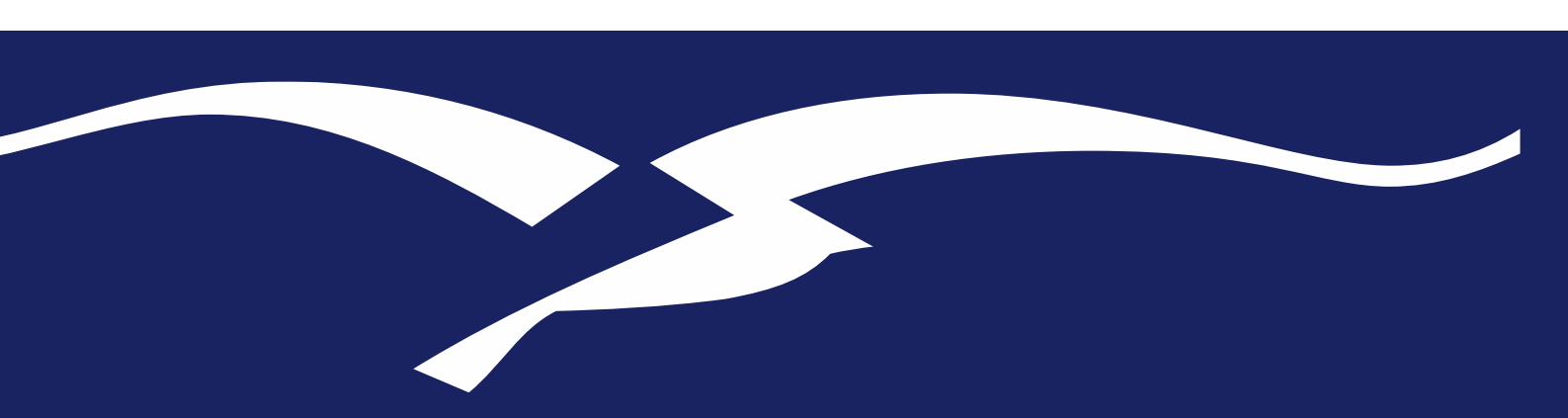
Technology	✓	
Other (please explain)		

6.0 IMPLICATIONS:
N/A

7.0 REASON FOR THE DECISION:
7.1 To ensure that our staff, contractors and tenants are able to manage water safety in our housing stock

8.0 BACKGROUND PAPERS:
N/A

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WATER SAFETY POLICY COUNCIL HOUSING STOCK

Policy Date	October 2020
Approved by Full Council on	
Review Date	April 2023 or following any change in legislation, codes of practice or case law



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1.0 Introduction

- 1.1 This Policy outlines how Arun District Council (ADC) will comply with the Regulatory Framework for Social Housing in England as outlined below:
 - 1.1.1 meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.
- 1.2 ADC, as the Duty Holder, has specific duties (amongst others) under the Control of Substances Hazardous to Health Regulations 2002 to:
 - 1.2.1 Carry out risk assessments and implement control measures
 - 1.2.2 Control exposure to harmful substances.
- 1.3 ADC aims to protect the occupiers of its properties, visitors, staff, contractors and the general public, from the risks associated with water hygiene so far as is reasonably practicable. This document sets out key policy objectives, control measures and accountabilities to protect residents, staff and contractors from harm.
- 1.4 This policy applies to all ADC owned, managed and maintained residential buildings.
- 1.5 The requirements of this policy apply to leasehold dwellings only as required to maintain safety of the block.

2.0 Background

- 2.1 Legionellosis is a collective term for diseases caused by legionella bacteria including the most serious Legionnaires' disease. It also includes the similar but less serious conditions of Pontiac fever and Lochgoilhead fever. Legionnaires' disease is a potentially fatal form of pneumonia and everyone is susceptible to infection. The risk of infection increases with age, but some people are at higher risk such as;
 - 2.1.1 People over 45
 - 2.1.2 Smokers and heavy drinkers
 - 2.1.3 People suffering from chronic respiratory or kidney disease, diabetes, lung and heart disease, or anyone with an impaired immune system
- 2.2 It is important to control the risks by introducing measures that do not allow proliferation of the organisms in the water systems and reduce, so far as is

reasonably practicable, exposure to water droplets and aerosol. This will reduce the possibility of creating conditions in which the risk from exposure to legionella bacteria is increased

3.0 Policy Objectives

3.1 Risk Assessments

3.1.1 ADC will carry out a Water Hygiene Risk Assessment (WHRA) for all Blocks across the portfolio, The WHRA will identify the need, if relevant, for a Written Scheme of Control for legionella identifying activities to reduce risk from legionella and other hazards. Generally, a Written Scheme of Control would only be necessary for Sheltered Housing Schemes and Temporary Accommodation Schemes

3.1.2 Use the outcomes from the WHRA to arrange programmes of routine monitoring and sampling of water systems, including, where needed, a programme of modification to any deficient systems and equipment.

3.1.3 WHRA's will be carried out:

Every 2 years in Sheltered Housing Schemes and Temporary Accommodation Schemes unless the risk assessor recommends more frequent assessments

3.1.4 Otherwise, they shall be carried out once only but reviewed:

When works affecting the shared water system have been completed
When vulnerability profile of the resident's changes significantly
On receipt of new information about risks or control measures
If a case of suspected/Legionnaires Disease is associated with the block

3.1.5 ADC will not carry out individual WHRA to dwellings unless there are special circumstances. A minimum of 10% of dwellings in a block, connected to any communal water system, will be surveyed. ADC will review the position regarding domestic WHRAs by July 2021

3.1.6 ADC will programme and commission WHRA from suitably qualified and accredited Contractors

3.1.7 WHRA's will be completed in accordance with guidance document HSG274 and BS8580-1:2019.

3.1.8 Maintain records of risk assessments, maintenance, monitoring and sampling and retain for at least five years – the Register

3.1.9 Carry out an inspection of the water storage & distribution system in vacant properties at new/change of tenancy. Water systems shall be flushed every week and prior to re-occupation.

3.2 Actions

3.2.1 WHRA describe actions that are required to be undertaken to remove or mitigate risks.

3.2.2 ADC will schedule and subsequently resolve actions, as far as is reasonably practicable, to reduce risk to a tolerable level.

3.2.3 The Risk Assessor carrying out the WHRA will allocate actions with a risk rating, and a target time to resolve, in line with the table set out below.

Priority Description	Resolution time
Very High	5 working days
High	3 months
Medium	6 months
Low	To be reviewed within 1 year

3.2.4 Action resolution times will be measured from the date the WHRA is submitted to ADC.

3.3 Inspection and monitoring

3.3.1 WHRA require a range of activities (in addition to actions) which will be completed and logged as set out below (regimes vary depending on the assets/risk level):

Frequency	Activity	By	Logged to
Weekly	Flushing of little used outlets – staffed sites	Arun DC staff	System or Logbook
Monthly	Audit weekly flushing of little used outlets Temperature checks of calorifier flow and return; Temperature checks of Sentinel and communal outlets		

Quarterly	Clean, descale and sterilise shower heads & hoses (communal)		
Annual	Storage Cistern temperature check & inspection		

3.4 Legionella Management Plan

3.4.1 ADC will maintain a set of water hygiene procedures and routinely carry out training with staff and contractors to ensure its requirements are understood.

The procedures will cover the following areas of management, amongst others:

- Allocation of specific roles and responsibilities to staff and contractors
- WHRA & Action Processing
- Routine monitoring & sampling
- Action Quality Control
- Customer communication
- Gaining access for essential works
- Training requirements
- Processes for incident management / emergencies

4.0 Legislation and Guidance

4.1 Arun District Council intends to meet its obligations under the following legislation:

- Control of Substances Hazardous to Health Regulations 2002
- Health and Safety at Work etc. Act, 1974
- Management of Health and Safety at Work Regulations 1999
- Housing Act 2004
- HHSRS – Housing Health and Safety Rating System

4.2 To meet the aims set out above Arun District Council will take account of the following guidance:

- Approved Code of Practice (ACOP) L8 - ‘Legionnaires Disease: The Control of Legionella Bacteria in Water Systems’
- HSG274 Parts 2 and 3
- BS8580-1:2019 ‘Water Quality – Risk Assessments for Legionella Control – Code of Practice

5.0 Policy implementation

- 5.1 The Chief Executive retains overall accountability for this policy. Arun District Council is the Duty-holder.
- 5.2 The Director of Services is responsible for ensuring adequate resources are available to meet the policy objectives.
- 5.3 The Group Head of Residential Services is responsible for policy implementation.
- 5.4 The Repairs and Maintenance Manager is responsible for delivery of the key policy objectives and for achieving the associated targets.

6.0 Monitoring and Quality Control

- 6.1 Arun District Council will monitor implementation of this policy using a set of performance measures as below:

Measure	Target	Reviewed by\interval
No. of blocks with current WHRA	100%	<u>Monthly</u> Repairs & Maintenance Manager Group Head of Residential Services
No. of overdue Actions	Zero	
No. of Open Actions	No target	
Monitoring & sampling regimes completed on target	100%	<u>Quarterly</u> Repairs & Maintenance Manager

ARUN DISTRICT COUNCIL

REPORT TO HOUSING AND CUSTOMER SERVICES WORKING GROUP ON 22 OCTOBER 2020

PART A : REPORT

SUBJECT:	Gas Safety Policy
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REPORT AUTHOR:	Satnam Kaur, Group Head of Residential Services
DATE:	5 October 2020
EXTN:	37740
PORTFOLIO AREA:	Residential Services

EXECUTIVE SUMMARY:

This report seeks approval for the adoption of the Gas Safety Policy in respect of Council housing stock.

RECOMMENDATIONS:

Housing and Customer Services Working Group is asked to recommend to Cabinet:

- The adoption of the Gas Safety Policy October 2020
- To give delegated authority to the Group Head of Residential Services in conjunction with the Cabinet Member for Residential Services to make minor changes to the policy

1.0 BACKGROUND:

- 1.1 As a landlord of social housing Arun District Council is responsible for managing the maintenance and repairs of our housing stock and this includes managing gas safety.
- 1.2 This policy outlines how we will comply with the Regulatory Framework for Social Housing in England as outlined below:
 - 1.2.1 Meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.
- 1.3 ADC has a specific duty under Section 11 of the Landlord and Tenant Act 1985 to "...keep in repair and proper working order the installations in the dwelling house".
- 1.4 ADC has a specific duty under Regulation 36 (Duties of Landlords) of the Gas Safety (Installation & Use) Regulations 1998 (GSIUR). Any gas appliance in a property that is owned by ADC and is rented to a tenant must be checked for Gas Safety within 12 months of its installation and within every subsequent 12-month period thereafter.

2.0 PROPOSAL(S):

2.1	The Gas Safety Policy to be approved so that responsible managers can implement this with contractors and staff.	
3.0	OPTIONS:	
3.1	There is no option other than to approve the policy to ensure we can manage gas safety within our housing stock.	
4.0	CONSULTATION:	
Has consultation been undertaken with:		YES
Relevant Town/Parish Council		NO
Relevant District Ward Councillors		✓
Other groups/persons (please specify)		✓
Members of the Housing and Customer Services Working Group		
5.0	YES	NO
ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)		
Financial		✓
Legal		✓
Human Rights/Equality Impact Assessment		✓
Community Safety including Section 17 of Crime & Disorder Act		✓
Sustainability		✓
Asset Management/Property/Land		✓
Technology		✓
Other (please explain)		
6.0	IMPLICATIONS:	
N/A		

7.0	REASON FOR THE DECISION:
7.1	To ensure that our staff, contractors and tenants are able to manage gas safety in our housing stock

8.0	BACKGROUND PAPERS:
N/A	



GAS SAFETY POLICY COUNCIL HOUSING STOCK

Policy Date	October 2020
Approved by Full Council on	
Review Date	April 2023 or following any change in legislation, codes of practice or case law

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1.0 Introduction and scope

1.1 This Policy outlines how Arun District Council (ADC) will comply with the Regulatory Framework for Social Housing in England as outlined below:

meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.

1.2 ADC has a specific duty under Section 11 of the [Landlord and Tenant Act 1985](#) to "...keep in repair and proper working order the installations in the dwelling house".

1.3 ADC has a specific duty under Regulation 36 (Duties of Landlords) of the Gas Safety (Installation & Use) Regulations 1998 (GSIUR). Any gas appliance in a property that is owned by ADC and is rented to a tenant must be checked for Gas Safety within 12 months of its installation and within every subsequent 12-month period thereafter.

1.4 ADC aims to protect the occupiers of its properties, visitors, staff, contractors, and the public, from the risks associated with gas so far as is reasonably practicable. This document sets out key policy objectives, control measures and accountabilities to protect residents, staff, and contractors from harm.

1.5 This policy applies to all ADC owned, managed, and maintained residential buildings.

1.6 ADC does not hold a duty of care in respect of gas appliances in leaseholders or shared owners' homes

2.0 Policy Objectives

2.1 Gas Safety checks

ADC will carry out a programme of gas safety checks (CP 12-LGSRs), at each dwelling which has a gas supply.

ADC operate an "MOT Style" programme. The gas safety check can be completed up to 60 days before the expiry date. The next test is then due on the anniversary of the expiry date (not brought forward). [*To be introduced from 1 April 2021*]

Contractors will carry out visual checks on residents' own appliances such as gas cookers and gas fires. Any problems identified will be recorded on the safety certificate and issued to the resident. Where the problem is potentially

dangerous, the appliance will be disconnected, and the supply capped off. Suitable advice on health and safety will be provided to the resident in this event.

Carry out a gas safety check at each change of tenancy

Carry out an annual gas safety check on each commercial\communal system (CP16 Gas Testing & Purging).

2.2 Access

It is a condition of individual tenancy agreements that residents must provide access to their properties for a gas safety check. ADC will make every possible effort to gain access to carry out the safety check and will, as a minimum (via our contractors or otherwise):

1. Issue a letter offering an appointment or a convenient alternative
2. Issue a 1st warning letter on failure to gain access
3. Issue a final warning of legal action
4. Take legal action to gain access to the property in accordance with ADCs Access Policy

2.3 Data records

ADC will store all LGSRs centrally, in electronic format, logged to the Register, and linked to the relevant property record by Asset ID. ADC will retain records of the last 3 LGSRs and for 2 years, from the last certificate date, if appliances are removed.

2.4 Contractors

ADC will only allow contractors registered with Gas Safe and Engineers who have been issued with an appropriate Gas Safe ID Card, to work on gas appliances.

2.5 Carbon Monoxide alarms

ADC will fit and maintain a carbon monoxide detector\alarm in each property with a gas meter. Homes will be checked annually and where there is no operating carbon monoxide detector\alarm contractors will fit one. (Programme of installation to be complete by 31 December 2021).

2.6 Gas Fires

ADC will remove or isolate all gas fires through the annual servicing programme. (Programme to be completed by 31 December 2021).

2.7 Gas Management Plan

ADC will maintain a set of gas safety procedures and routinely carry out training with staff and contractors to ensure its requirements are understood.

The procedures will cover the following areas of management, amongst others:

- Allocation of specific roles and responsibilities to staff and contractors
- The means of populating and disseminating the LGSR Register
- The competencies & responsibilities of contractors
- Training requirements
- Processes for incident management / emergencies
- Arrangements relating to enforcement

3.0 Legislation and Guidance

3.1 ADC intends to meet its obligations under the following legislation:

- Health and Safety at Work etc. Act, 1974
- Management of Health and Safety at Work Regulations 1999
- HHSRS – Housing Health and Safety Rating System.
- The Gas Safety (Installation and Use) Regulations 1998 (Amended 2018)

3.2 ADC will also take note of the following legislation, which applies to private landlords only:

- The Smoke and Carbon Monoxide Alarm (England) Regulations 2015

4.0 Policy implementation

4.1 The Chief Executive retains overall accountability for this policy. ADC is the Duty-holder.

4.2 The Director of Services is responsible for ensuring adequate resources are available to meet the policy objectives.

4.3 The Group Head of Residential Services is responsible for policy implementation.

4.4 The Repairs and Maintenance Manager is responsible for delivery of the key policy objectives including the management of all contractors carrying out any works on gas appliances.

4.5 Repairs Support Officers shall support contractors in gaining access to carry out works and inspections.

5.0 Monitoring and Quality Control

5.1 ADC District Council will carry out following quality control:

- 3rd part specialist supplier will carry out 10% audit of all LGSR's each month

5.2 ADC will monitor implementation of this policy using a set of performance measures as below:

Measure	Target	Reviewed by/interval
No. of blocks (communal systems) with valid LGSR	100%	<u>Monthly</u> Repairs & Maintenance Manager Group Head of Residential Services
No. of dwellings with valid LGSR	100%	<u>Monthly</u> Repairs & Maintenance Manager Group Head of Residential Services

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