

21 April 2022

Dear Member,

 The next Management Committee will be held on **Thursday 28 April 2022 at 6PM via Zoom**

Agenda Item	Lead	Time	
1. Welcome, <i>Sederunt</i> & Apologies	Chair	1min	Verbal
2. Jargon Buster			For Information
3. Declarations of Interest.	Chair	1min	Verbal
4. Minutes of the Committee Meeting of 8 March 2022	Chair	2min	Approval
5. Matters Arising & Actions from the minutes report	Director	2min	Note
6. Gas Servicing Report	Maintenance Manager	10min	Approval
7. Allocations Policy	Housing Manager	15min	Approval
8. Rent arrears update report	Housing Manager	10min	Approval
9. Operational update	Management Team	10min	Note
10. AOCB	Chair	10min	Approval
11. Co-option of new committee members			
Close of Meeting: 8PM			
Next Meeting: 26 May 2022 at 6PM.			

	JARGON BUSTER – APRIL 2022
Terminology	Definition
Asset Management	The process for operating, maintaining, and upgrading physical assets, such as housing stock, in a cost-effective way to maximise financial returns, minimise financial risk and meet the needs of current and future tenants.
Bad Debts	A Bad Debt is an outstanding sum of money owed to the Housing Association that has not been paid, despite repeated efforts to collect the debt .
Covenant compliance	A loan covenant is a condition in a commercial loan that requires the borrower to fulfill certain conditions or which forbids the borrower from undertaking certain actions, or which possibly restricts certain activities. Compliance means conditions are met in full.
CPI	The Consumer Price Index (CPI) is the official measure of inflation of consumer prices of the United Kingdom
Cyclical Maintenance	Cyclical maintenance is work to maintain the general condition of the property and some communal fittings
Employers in Voluntary Housing (EVH)	An organisation providing support for the governing bodies of housing associations in all aspects of their role as employers.
EQIA	<p>An equality impact assessment (EqIA) is a process designed to ensure that a policy, project or scheme does not unlawfully discriminate against any protected</p> <p>It covers people in respect of all aspects of equality (age, disability, sex, race, religion or belief, sexual orientation, gender reassignment and pregnancy and maternity). It helps to ensure the needs of people are taken into account during the development and implementation of a new policy or service or when a change is made to a current policy or service.</p>
FTA	Former Tenant Arrears
Major repairs/planned renewals	Major Repairs (Investment works) – Kitchen & bathroom renewals, central heating replacements, door entry systems etc.
Reactive Maintenance	Reactive Repairs. Reactive repairs or day to day repairs are funded from rental income and are defined as those repairs which are carried out on a responsive basis as the need arises and are not deferred for inclusion in planned maintenance programmes
RSL	Registered social landlord. The vast majority of Registered Social Landlords are also known as Housing associations. Housing associations are independent, not-for-profit organisations that provide homes for people in housing need.

**WELLHOUSE HOUSING ASSOCIATION
MINUTES OF THE COMMITTEE MEETING HELD ON
8 March 2022 (Rescheduled from 24 February 2022) at 6PM - VIA ZOOM**

1. Welcome, Sederunt & Apologies.

Present:

Maureen Morris	Chair
Jane Heppenstall	Committee Member
Michelle Harrow	Committee Member
Darron Brown	Committee Member

In Attendance:

Martin Wilkie-McFarlane	Director
Carol Hamilton	Housing & Customer Services Manager
Robert Murray	Finance & Corporate Services Manager
Linda Logan	Minute taker

Apologies:

Clare Monteith	Vice Chair
Sarah Morris	Committee Member
Shona McKenna	Committee Member (Leave of absence)
Carol Torrie	Committee Member

2. Jargon Buster

Noted for information.

3. Declarations of Interest.

There were no declarations of interest.

4. Minutes of the Committee Meeting of 27 January 2022.

Resolution:

The minutes of the Committee Meeting of 27 January 2022 were proposed by Jane Heppenstall and seconded by Michelle Harrow as an accurate record of the proceedings.

5. Matters arising and actions from the minute report.

The Director stated that Hybrid working will continue until the 31st of March 2022. An update will be provided at the next meeting.

He reminded committee of the planned business planning session. Suggested dates had not been suitable for members. He will forward additional dates once he has had a discussion with the business planning consultant.

There were no other matters arising that were not covered in subsequent agenda items.

6. Draft Budget 2022/23 – Version 4

The Chair asked committee to note version 4 of the draft budget. She sought clarification on the position of loan covenants. The Director asked committee to ignore pages 11 – 20 included in the February committee papers and to refer to the report sent under separate cover dated 8 March 2022. The Director sought clarification from the Chair if she was comfortable with the Finance Manager presenting his report first and then addressing her query re: loan covenants. The Chair agreed to this.

The Finance Manager stated that there had been some misunderstanding in assumed expenditure costs. The Maintenance Manager had met with the Finance Manager and the main findings of the review were that some of the cost increases with regards costs had been increased by both parties. It was also noted that a blanket 15% increase had not been realistic as much of the expense was for labour only. He noted proposed commercial rents for 17 – 19 Newhills Road would not be realised and the revised figure had been included within the budget. Rental income of 3.8% had also been applied.

He asked committee to note page 2, point 5.1 which highlighted that the previous version of the budget reflected that loan covenants were not being satisfied. He noted that a line-by-line review of expenses had taken place to ensure that the figures were reasonable and that the revised budget was achievable. He noted that £1.4M of the Maintenance budget represent the highest percentage of spend. He provided a brief overview in spend across Cyclical, Reactive and Major Repairs.

The Director asked the Maintenance Manager to recap the main assumptions within the budget. The Maintenance Manager highlighted that Cyclical Maintenance were works that were required and planned ahead on a yearly basis. Discussion had occurred with our contractors to ascertain contract % increases in relation to electrical testing, external painting, gas servicing etc. and expenditure calculated accordingly. He noted that Reactive Maintenance, has on average 35-40 voids per year. He reported that over the first 9 months of this year, 47 voids had required clearance with extensive works required due to the condition of the properties. Planned spend on Major Repairs was £901K with the majority of spend on the window and door replacement programme. He noted that an early start date had been achieved for the contract which would result in some spend being recorded for this year.

The Director sought clarification that contract % increases had been detailed within the Maintenance Budget to March 2023 and asked committee to note the A3 sheet that had been sent under separate cover to provide further detail. The Maintenance Manager confirmed the level of detail provided.

Darron Brown thanked the Maintenance & Finance Manager for the detailed budget. He acknowledged the difficulty in forward planning given the uncertainty across the industry in the supply and demand of materials and escalating costs.

Michelle Harrow enquired if the delay in supply of materials was having an impact on the days taken to let void properties. The Maintenance Manager stated that during Covid the requirement to only allow one trade into the property at a time had resulted in delays. The Housing Manager confirmed that the averages re-let times for the last quarter were currently at 27 days.

The Finance Manager noted that the existing budget assumes the current staffing level and assumes a 2.5% increase as previously agreed. EVH has indicated that discussion is still ongoing with employee representatives and the union. A provision of maternity and adoption statutory cover had also been included within the report. He provided a brief overview of overheads in Management Expenses and provided a breakdown of higher value headings in relation to Corporate Services as shown at page 5 and 6 of the report.

Bad debts provision was lower than the provision at 31 March 2021 in the main due to the level of progress by the housing team in the collection and reduction in the level of rent arrears.

He noted that financial viability is not only determined by increasing income but also by cutting costs, operating more efficiency and a focus on Value for Money identify areas where costs can be controlled further. The SFHA toolkit has been utilised to review rent against local and national averages which showed that rents were less than LHA amounts and significantly less than market rents.

A surplus of £512,782 will be achieved for 22/23. The Director sought clarification and Finance Manager confirmed a positive movement of £103,934.38 surplus for the year, as compared to that reported in the 3rd draft budget report. Lender covenants were now being achieved.

Michelle Harrow queried and discussion ensued with regards evidencing Value for Money to our tenants given the current rent increase. The Director noted work on the current business plan where a different measurement was being considered for rent increases. He confirmed that vast sums of the budget were spent of repairs and voids in particular.

The Chair sought clarification if breaching our loan covenants was a notifiable event. The Director confirmed that it would be. He stressed that we would not be breaching our loan covenants. Our concern arose from accidental uplifts being included in the previous budget. He noted to provide additional comfort he had asked Wylie Bisset to complete an internal budget setting process audit. He will feedback to committee as required.

Action: To provide further assurance and to take account of cost instability and the rapidly changing market, the Director proposed that at the October committee meeting a formal budget reforecast will be presented for consideration.

Resolution:

Committee:

Noted the current levels of CPI, RPI and CPIH are higher than the current rental increase of 3.8% and may present challenges in the future with regards meeting the requirement of having a budget that services the housing stock to a satisfactory level and leaves sufficient surplus to meet loan commitments and component replacements.

Instructed the Finance Manager to adopt the budget as the final version to be used for budget setting and report to the Regulator in the 30-year business plan.

Approved the Version 4 - 2022/23 Draft Budget.

Michelle Harrow proposed and Darron Brown seconded the Version 4 - 2022/23 Draft Budget for adoption.

7. Standing Orders and Delegated Authority Review.

The review of Standing Orders and Delegated Authority was sent to committee under separate cover for approval and will be reviewed in 3 years. It was noted the only change being the inclusion of the new Committee Role Description as approved by committee during the appraisal process. A separate minute providing email approval had been prepared.

Resolution:

Committee approved the reviewed Standing Order and Delegated Authority for a further 3 years.

8. Bulk uplift report.

The Maintenance Manager presented the report to update on bulk and refuse issues and potential costs in the future. He noted that the Estate Wardens collect bulk waste twice weekly resulting in 4 – 5 trips to the recycling centre each day. He highlighted the current costs for disposal at appendix 1 and the increase of bulk in backcourt areas at appendix 2 of the report.

He proposed that the situation will be monitored given the pressures on the Estates team and the potential costs being accrued. A report will be brought back to committee in 6 months with recommendations as noted at item 7 of the report.

Discussion ensued with regards the use of CCTV to capture evidence. The Housing Manager explained that the GCC Anti-Social Team do not provide this service. Research into the use of CCTV and costs are being explored.

Committee noted the content of the report.

9. KPI's – Qtr. 3

The Housing and Maintenance Managers detailed KPI performance results for the third quarter against targets set for 2021/22. It was noted the report still highlights areas of concern in relation to the level of rent arrears. Relet times in quarter 3 were lengthier than normal in the main due to a delay in processes as a result of Covid coupled with an increase in refusals, however there were plenty of other KPI's from which to take comfort. The Maintenance Manager noted an increase in repair requests over the period. Gas servicing is back to 100% access however a high level of forced accesses are still being experienced.

The Director queried and it was noted that the budget for adaptations for the year had been £25K however additional funding had been required through HAG grant funding allowing for a £55K spend for adaptations.

Committee noted the KPI Qtr. 3 results.

10. Complaints & Compliments 2021/22 update.

The Housing Manager noted that the Association had received 15 complaints during the 3rd Qtr. of 21/22. 13 Stage 1 complaints received during the period were completed within timescale with performance of 2.59 days against and SPSO target of 5 working days. There were 2 Stage 2 complaints, completed within timescale with performance at 13 days against an SPSO target of 20 working days. She asked committee to note the table at point 4.4 which detailed the main complaints and the outcomes at page 3 of the report. During the period 4 compliments in relation to our estates service and the level of customer service from housing staff were received. The complaints process had recently been audited.

Committee noted the complaints and compliments update for the 3rd Qtr. of 21/22

11. Rent Arrears update.

The Housing Manager reported that since the last committee update, gross current rent arrears had increased by £2,941 to £290,516. For the same period net current arrears had reduced by £402 to £279,556 and former tenant arrears had increased by £827.

She noted that direct debits to the value of £889.26 were cancelled or returned as unpaid during the month of January and one housing benefit payment of £1020 was incorrectly coded by GCC and will be accounted for in February figures. Universal Credit is now claimed by 245 of Wellhouse households and account for £165,132 of total gross current rent arrears.

The Housing team are focusing on reducing the UC Debt, ensuring that affordable arrangements are being made for those with outstanding balances. There are currently 18 cases in the legal system for Former Tenant arrears.

She confirmed that the Covid-10 Tenant Grant Fund of £7,817 had been received and allocated to those households who fulfilled the criteria.

The Director asked that his thanks be passed to the Housing Team for their continued hard work to reduce rent arrears. He further acknowledged the incredible success of the Income Advice Officer who achieved financial gains of £663,000 for our tenants this year.

Committee noted the update on the arrears position.

12. Policy review report

The review of Complaints, Compliments and Comments Policy, Legionella Policy, Gas Management Policy and Asbestos Policy were sent to committee under separate cover for approval to allow for additional time for detailed discussions on the budget report to take place. Committee noted the minor changes to the policies as outlined within the report which would be reviewed in 3 years. A separate minute providing email approval had been prepared.

Resolution:

Committee ratified the Complaints, Compliments and Comments Policy, Legionella Policy, Gas Management Policy and Asbestos Policy for a further 3 years.

13. Operational update report.

Director:

The Directors operational update was presented in closed session.

Housing and Customer Services Manager

The Housing Manager noted rent increase letters had now been delivered to all tenants to advise of their rent charge for 2022/23. Consultation on the draft Allocations Policy is now underway. A morning, afternoon and evening session has been arranged in the Hub café on 28th and 29th March. All applicants and tenants will be lettered next week informing them of the consultation dates and will include a summary copy of the policy. A link to the full policy on the website will also be included. Tea, coffee and biscuits/cake will be supplied.

Michelle Harrow asked if the new Domestic Abuse Policy update would be included in the Allocations Policy. The Housing Manager confirmed that we had a separate Domestic Abuse Policy and it would be updated accordingly.

She advised that Stuart Montgomery had been retained to assist with an equalities impact assessment as requested by committee.

Assets & Maintenance Manager :

The Maintenance Manager highlighted items discussed earlier in the meeting.

He advised that kitchen and bathroom installations continue, however, the contractor has been encountering delays either due to tenants or tradesmen having Covid.

Finance Manager :

The Finance Manager advised that he would attend the SFHA training session during March covering Data Protection and GDPR. Work has commenced to migrate all information held on the servers over to a cloud-based service. Homemaster will go live the first two weeks in April 22. Staff continue to test and familiarise themselves with the new system with regular meetings taking place with the provider.

The Director thanked committee for their approval for the implementation of the new CRM system which will allow us to move to a completely cloud-based system.

14. AOCB

Leave of absence:

The Chair advised that Shona McKenna, Committee Member, had requested a leave of absence for three months. Darron Brown advised that he had approached a potential committee member and would pass details to the Corporate & Governance Officer.

The Corporate & Governance Officer highlighted that committee recruitment adverts had been placed, its hoped that further members will be recruited.

The Director confirmed, with 7 operating members, a notifiable event will be raised and a plan of action will be discussed with the Regulator. He thanked committee for their continued commitment to the Association.

Resolution:

Committee approved the request for a 3 month leave of absence from Shona McKenna which was proposed by Darron Brown and seconded by Jane Heppenstall.

The Chair advised of a meeting held with Susan Aitken, Leader of the Council and agreement of funding to EHRA for Covid recovery. Further funding of £1M has been allocated to different wards for building and structural works across the city. A meeting with Councillor Ruairi Kelly has been arranged to discuss further. A more detailed report will be presented to committee in April.

There was no other business. Meeting closed: 8:00PM
Next meeting: 28th April 2022 at 6PM

I certify that the above minute has been approved as a true and accurate reflection of the proceedings:

Signed (Chair)

Date:.....

ACTIONS ARISING FROM PREVIOUS MANAGEMENT COMMITTEE MEETINGS April 2022

MINUTE REFERENCE	ACTION	OWNER	DUE BY	STATUS OPEN/ CLOSED	PROGRESS
24 October 2019					
11. Management Team Report	Site at the former Wellhouse Primary School; The Director will report on the feasibility of progressing a development and a bid for this site.	Martin Wilkie-McFarlane	March 2020	Open	Ongoing - the Director will provide an update at the April 2022 committee meeting.
November 2019					
11. Management Team Report	The Finance Manager will email proposed dates for fraud training to interested members	Finance Manager	January 2020	Open	The Finance Manager is still waiting for proposed dates for fraud training from the auditors. Suspended during COVID-19 lockdown period
August 2021					
Business Plan	The Director will present an updated business plan to the October committee meeting.	Director	October 2021	Open	Committee agreed in November to use JHC consultancy and the company have started the initial stages of the work: SMT have submitted information to the consultant at time of writing. A report will be presented to committee at a later date. Committee were unable to attend the business planning away day on the dates provided. The Director will speak with the business planning consultant to check availability and provide committee with additional dates.
Factoring Policy	Review of Factoring Policy	Housing Manager	October 2021	Open	The Factoring policy was approved at the January 2021 meeting. The factoring process is still under review and will be presented to future committee meeting.
October 2021					
Rent arrears report	The Housing Manager will contact GCC for further	Housing Manager	November 2021	Open	The Housing Manager will report back to committee at the April 2022 committee meeting.

	information on their administration of the Scottish Gov fund and feedback to committee				
November 2021					
Budget 22/23	Committee discussed employee terms and conditions of employment	Director	Future Committee Meeting	Open	The Director will look at alternative arrangements. Risk assessments and cost implications will be included within the report. Committee agreed to remit to the Staffing Committee
March 2022					
Bad Debt Write off	The Director and Housing Manager will discuss and seek guidance from TC Young with regards recovery of a portion of untraceable debt.	Director and Housing Manager	April	Open	The Director and Housing Manager had met with T.C.Young and will report at the April 2022 committee meeting
Budget 22/23	To provide further assurance and to take account of cost instability and the rapidly changing market, the Director proposed that at the October committee meeting a formal budget reforecast be presented for consideration	Management Team	October	Open	

Management Committee	28 April 2022
Agenda Item	6
Title of Paper	Gas Management - Servicing & Maintenance
Author	Bill Black, Assets & Maintenance Manager
Attachment	N/A

FOR DECISION

1 PURPOSE

- 1.1 To update and provide information to the Committee on the proposed changes to the Gas Servicing and Maintenance Contract with Saltire.

2 RECOMMENDATIONS

Committee are being asked for approval to extend the current gas management and servicing contract for 2 years and the cost increase of £80 to £96 + VAT per property. Cost breakdown equates to £45 for servicing and £51 for maintenance. That is an increase from £62,880 + VAT to £75,456 + VAT per year for 786 properties with gas.

3 BACKGROUND

- 3.1 We are currently on the last year of a 5-year contract awarded in 2017 through competitive tendering. The Management Committee approved in February 2020 the option to extend the contract for 2 years until 31st March 2022, we have not had an increase to the contract within the 2 years of the extension.

4. BUSINESS PLAN, VISION AND VALUES

- 4.1 The proposal is consistent with our commitment to improve our performance management and strategic asset management in the business plan, and is consistent with the following strategic objectives;

- Deliver excellent services
- Provide good quality homes

It is also consistent with our Values of:

- Excellence
- Accountability
- Sustainability

5. MAIN ISSUE(S) / IMPROVMENTS

- 5.1 Following on from the last two years of restrictions due to Covid the market has been very unsettled in procuring contracts, with increases to both labour and materials being reported. Going to open tender at the moment in the current climate of uncertainty could potentially open us up to larger cost implications as evidenced in our previous report on the cost increases to the window and door replacement contract, a 10.7% increase and in addition our recent tender return for the veranda works. The last tender submitted was £77,000 for 4 properties, the current and cheapest tender returned was £80,000 for completion works on 2 verandas.
- 5.2 The contractor has reported the following cost increases of,
- Labour, in some cases a 20% wage increase.*
- Material cost price increases in all material/spare parts/consumables, with increases in steel and copper which are now equating to 50% and 30% respectively.*
- Van hire - Van hire has gone up over 10% in the last 18 months.*
- Fuel increase - Fuel has increased a rise of around 35%.*
- Nat/ Insurance – NI will increase around 1.5% in the coming months.*
- 5.3. We have a good contractor in Saltire and have an excellent working relationship with them. Gas serving and maintenance is highly regulated and core to our tenant safety. We will be continuing to explore more options for community benefits, which has worked well in the past.

6. REGULATORY, LEGAL AND CONSTITUTIONAL ISSUES

- 6.1 None, we are allowed to negotiate an extension as long as it is not longer than 50% of the existing contract. There would be no changes to the way we deal with the annual servicing and maintenance.

7. FINANCIAL IMPLICATIONS

- 7.1 We had already allowed for an increase in the current budget and these increases are well within that.
- 7.2 We have carried out some bench marking with three other housing associations and the cost is still very competitive. Their current costs per property excluding VAT, are £95.00, £108.00 and £110.00 Our cost would equate to £96.00, excluding VAT.

8. KEY RISKS

None. Tenants will still receive the same service and we will have the comfort of knowing our costs

9. EQUALITY AND DIVERSITY ISSUES

- 9.1 None

10 SUSTAINABILITY

- 10.1 The report meets the Association's commitment to sustainability

11. SWOT ANALYSIS

Strengths Good working relationships Cost within bench marking Reputation of both Organisations Effective repairs service Tenant satisfaction Known financial impact	Weaknesses
Opportunities Joint working Community benefits	Threats Future costs unknown post contract Brexit

12. CONCLUSION

- 12.1 Committee are asked to discuss and consider approving the contract extension and cost increases as reported..

Management Committee	28 April 2022
Agenda Item	7
Title of Paper	Allocations Policy – Update
Author	Carol Hamilton, Housing & Customer Service Manager
Attachment(s)	Appendix 1 – Draft Allocations Policy Appendix 2 – Summary of Equality Impact Assessment of the Draft Allocation Policy
Executive summary	

FOR INFORMATION

1 PURPOSE

- 1.1 To update Committee on the progress of the Allocations Policy

2 RECOMMENDATION

- 2.1 That the progress of the implementation of the Draft Allocation Policy be noted.

3 BUSINESS PLAN, VISION AND VALUES

- 3.1 The production of an allocations update report is consistent with:

- All of our strategic objectives
- Our Vision and;
- All of our Values

4 BACKGROUND

- 4.1 WHA withdrew from the Common Housing Register (CHR) Allocation Policy with 4 other EHRA Landlords in April 2021. At the Committee meeting held in April, Committee gave approval for staff to draft a new Policy which would better reflect the needs of our community. The draft policy (Appendix 1) was presented to Committee in November 2021, and it was agreed that appropriate consultation and an Equalities Impact Assessment would be undertaken, and that the outcome would be reported at the meeting in April 2022.

5. MAIN ISSUES:

Consultation

- 5.1 All Wellhouse tenants and applicants were provided with a summary of the draft allocation policy and invited to attend 1 of 3 consultation sessions which were held in The Hub Café on 28th and 29th March. A choice of morning, afternoon and evening sessions were offered. Details were also provided on the website.

5.2 Only 2 tenants and one applicant attended, and the Policy was explained to each of them in detail. No questions or comments were raised in relation to the Policy. There were no responses to the consultation by email or telephone.

5.3 The draft Policy was circulated for comment to:

- Glasgow City Council (GCC) Homeless Service
- GCC Care and After Care Services (Looked after Children)
- Health and Social Care Partnership (HSCP)
- Glasgow Women's Aid
- HSCP Sex Offences Liaison Team (SOLO)

Some of the above-named stakeholders shared the draft Policy within their own networks including EHRA colleagues. Verbal feedback was received from the SOLO team who advise they were satisfied with the policy generally and that it covered the needs of their clients. The only other feedback was provided by the Principal Officer, GCC Housing Strategy, who advised:

- Our comments relate to the strategy and how this policy links.
- The draft allocations policy sets out a clear value-based vision for Wellhouse HA. Place-making is an important feature of our housing strategy, and it is good to see the emphasis on the importance of housing contributing towards making Wellhouse a great place to live.
- The policy aims are clear and concise. For sections 5-7, the references to the Scottish Social Housing Charter, relevant legislation and guidance are useful. For reference, it may be helpful to include web links to view/download the respective documents in an electronic version.
- The lists, priorities and points approach are clearly set out. Supporting people to live independently within the community is a key strategic priority for Glasgow and it is good see a focus on medical and social needs alongside housing needs.
- It appears that an applicant may receive multiple awards of points unless specified, e.g., "only 1 medical award can be claimed per application". It may be helpful to include a case/worked example to demonstrate how the points work (perhaps as additional information, an appendix or background

Equalities Impact Assessment

5.4 It was agreed by Committee that an Equalities Impact Assessment (EQIA) would be carried out and several documents have been provided by the Consultant, who has also been commissioned to provide an Equalities Policy. A summary of the EQIA is attached to this report (Appendix 2). While the EQIA has not highlighted any major issues, it is evident that further minor adjustments are required.

5.5 The final Equalities Policy is expected to be provided by the end of April and a date is to be arranged with the Consultant to discuss the Equalities Policy as well as the outcome of the EQIA of the draft Allocations Policy, after which final adjustments will be made and provided to Committee for approval.



POLICY

Allocations - DRAFT

Wellhouse - The Place to Be

Draft Policy Created: September 2021

Date of Last Review: N/A

Date of Current Review: October 2021

Date of Next Review: October 2024

Reviewed by: Housing and Customer Service Manager

The policy is available on the Association's website. Customers will be provided with a copy of this policy on request. We will provide this policy in specific formats as requested, i.e., tape, Braille or another language.

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Linked Policies/Procedures

1.	Openness and Confidentiality
2.	Customer Engagement and Participation Policy
3.	Vulnerable Tenants – Domestic Abuse
4.	Complaints Policy
5.	Income and Debt Recovery
6.	Rent and Service Charge Policy
7.	Data Protection Policy
8.	Repairs and Maintenance Policy

1. Vision and values

Wellhouse – the Place to Be.

This simple statement is our vision of Wellhouse as an attractive place where people feel happy and safe, benefit from having a good home and an attractive environment and feel proud to be part of a vibrant community.

We believe that our values of **Trust, Honesty, Integrity, Excellence, Accountability and Sustainability** supported by a comprehensive policy framework will help make our vision a reality.

2. Governance

Wellhouse HA is a community controlled Registered Social Landlord and is managed by a group of local people who are elected onto the Management Committee. We may co-opt other people onto the Management Committee from time to time where we feel we need specialist support. Their role is to make sure that the Association is well run, meets the needs of the local area and is responsive to what is important to local people.

The Management Committee appoints senior staff, agrees all the Association's policies and takes all the key decisions. The Director and the senior team support the Committee in these responsibilities.

3. Policy Aims

The Allocations Policy sets out the principals that Wellhouse Housing Association follows in order to allocate our housing stock. The Association aims to:

- Provide good quality affordable and secure rented accommodation to those demonstrating housing need
- Facilitate fair and open access to the housing lists
- Comply with legislative and good practice requirements in regard to the assessment and allocation of housing
- Prioritise those in housing need (reasonable preference being given to those applicants referred by Glasgow City Council via the Section 5 Homeless Referral route, applicants occupying houses which do not meet tolerable standards; are living in unsatisfactory housing in relation to access or medical condition or are occupying overcrowded houses
- Make the best use of stock seeking to promote sustainable
- Proactively minimise the cost of the process
- Establish tenancies which are successful and encourage tenants to maintain their tenancies.

4. Equal Opportunities and Human Rights Statement

We aim to ensure that all services, including the delivery of this policy, provide equality of opportunity.

We will respond to the different needs and service requirements of individuals. We will not discriminate against any individual for any reason, including age, disability, gender re-assignment, marriage, civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation, or other status.

5. Scottish Housing Charter

The Scottish Government's Social Housing Charter came into force in April 2012 and was reviewed in 2019. The Charter sets out the standards and outcomes that Registered Social Landlords should achieve.

There are 8 outcomes under the Charter that are especially relevant to our allocation policy, these are:

Outcome 1 Equalities

Social landlords perform all aspects of their housing services so that:

- every tenant and other customer have their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services

Outcome 2 Communication

Social landlords manage their business so that:

- tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides

Outcome 3 Participation

Social landlords manage their businesses so that:

- tenants and other customers find it easy to participate in and influence their landlords' decisions at a level they feel comfortable with

Outcomes 7, 8 & 9 Housing Options

Social landlords work together to ensure that:

- people looking for housing get information that helps them make informed choices and decisions about the range of housing options available to them
- tenants and people on housing lists can review their housing options

Social landlords ensure that:

- people at risk of losing their homes get advice on preventing homelessness

Outcome 10 Access to Social Housing

Social landlords ensure that:

- people looking for housing find it easy to apply for the widest choice of social housing available and get the information they need on how the landlord allocates homes and on their prospects of being housed

Outcome11 Tenancy Sustainment

Social Landlords ensure that:

- Tenants get the information they need on how to obtain support to remain in their homes and ensure suitable support is available, including services provided directly by the landlord and other organisations.

6. Legislation

The following legislation is relevant to this policy:

- The Housing (Scotland) Act 1987
- The Housing (Scotland) Act 2001 & 2010
- The Housing (Scotland) Act 2014
- Homelessness etc. (Scotland) Act 2003
- Matrimonial Homes (Family Protection) (Scotland) Act 1981
- Civil Partnership Act 2004
- Management of Offenders Act 2005
- Equality Act 2010
- Data Protection Act 2018
- Human Rights Act 1998
- Freedom of Information (Scotland) Act 2002

7. Guidance

The Allocations Policy has been developed with due regard given to the Scottish Governments “Social Housing Allocations in Scotland: A Practice Guide” February 2019

8. The Policy

Access to housing

In accordance with the Housing (Scotland) Act 1987 (as amended by Section 9 of the 2001 Act and 2014 Act), the Association will not exclude any applicants from applying for housing.

The Association will ensure that access to its housing lists is open to all applicants aged 16 years and over.

Applicants will only be placed on the most appropriate of the three live lists only once they have provided all requested information in support of their application.

Applicants should note, however, that placement on one of the housing lists does not mean they will receive an offer of rehousing. Wellhouse HA receives many more applicants for housing than the number of houses that become available for let.

The Association will strive to provide applicants with up-to-date advice regarding their housing prospects and, where appropriate, discuss other housing options.

Housing Lists

We operate three separate housing lists being:

Homeless
Transfers
Waiting List

Joining Our Homeless List

Homeless applicants are held on a **separate priority list**, to allow the Association to meet its obligations under the joint Glasgow City Council/Registered Social Landlord protocol in relation to homeless applicants. All referrals must come via the Housing Access Team.

As soon as a Section 5 Referral is received from Glasgow City Council (GCC) and accepted by the Association, the application will be processed onto our Homeless List.

Joining Our Transfer List

Existing tenants of Wellhouse Housing Association can apply to be rehoused. They will complete our Housing Application Form and if meet criteria will be added to our Transfer List.

Joining Our Waiting List

All other applicants will complete our Housing Application Form and if meet criteria will be added to our Waiting List. This will include household facing potential Homelessness but not assessed by GCC as a Section 5 (although we will advise such applicants as part of their housing options to contact GCC to be assessed) or those where rehousing is requested via a protocol such as care leavers or those fleeing domestic violence.

Assessment

Within each housing list the Association operates a priorities and points system of allocations based on housing need.

Assessment is carried out by allocating points based on the applicant's;

- Housing Needs
- Medical Needs

- Social Needs

as described in the applicant's application form.

Owner Occupiers

Owners seeking a move will only be pointed at the time WHA receives proof of either a house sale or repossession and the points / priority will only be applied at date of sale / repossession.

Targets/Quotas

Housing List	% Target
Homeless	45%
Transfers	20%
Waiting List	35%

The Points Scheme

The priority awarded to Transfer and Waiting List applicants is dependent upon the number of points that the application attracts in terms of the points scheme as detailed below: -

Housing Needs

Security of Tenure

Clearance/Major Works 250 Pts

Your home is due to be demolished or major repairs works is being carried out that prevents you from occupying your home. Points will only be applied upon receipt of evidence of these works.

Property is below The Tolerable Standard 200 Pts

Your home falls below The Tolerable Standard, which requires a home to be structurally stable and free of dampness. It must have natural and artificial lighting, thermal insulation, hot and cold water, toilet and bathing facilities, proper drainage and facilities for cooking, heating and safe electrics.

Homeless 75 points

To assist with the effective management of homelessness those cases threatened with or are statutorily homelessness will be given additional points when they apply directly to us via our waiting list. We will advise and recommend to such applicants of the Section 5 route and their rights under homeless legislation.

Tied Accommodation 75 Pts

You are living in accommodation linked to your job and your employment is due to end within the next six months.

Discharge from Armed Forces 75 Pts

You are currently in the armed forces and are due to leave within the next six months

Notice to Quit 75 Pts

You are in private rented property and have been served a notice to quit through the correct legal procedures or your home is being repossessed because you have not kept up with your mortgage payments

No Fixed Address 30 Pts

You have no fixed address at which you can freely and safely reside.

Insecure Tenancy 20 Pts

You are in a private sector tenancy

Access to Suitable Facilities**Sharing Facilities (No Family) 20 Pts**

Applicant/s who have to sharing cooking, toilet or bathing facilities with another household

Sharing Facilities (Family) 30 Pts

Applicant/s, with family, who have to sharing cooking, toilet or bathing facilities with another household

No or Inadequate Facilities

We will advise applicants of the Tolerable Standard.

Occupancy Rules**Overcrowding 50 Pts per bedroom lacking**

Points for overcrowding will be based on the following criteria: -

- Applicants and partner to occupy one bedroom
- With the exception of couples or children aged 9 or under, persons of different sex shall not share a bedroom

- Any members of the household aged 15 years, or over, require a separate bedroom
- Normally there should be no more than two occupants in any bedroom (excluding newly born)
- Where overcrowding will occur as a result of pregnancy a medical certificate will be required and points awarded 12 weeks prior to the date of confinement
- Applicants who require sole use of a bedroom due to a medical condition and that cannot be facilitated by existing accommodation

Please note that where Overcrowding is as a result of an applicant deliberately worsening their housing circumstances (for example giving up a tenancy to move in with another household) or because of shared access to children only one award of overcrowding points will be given i.e., 50 pts

Carers

The Association will allow applicants with carers to queue for a larger house where the carer sleeps over for three nights or more in any given week. Proof of such an arrangement is required however no additional overcrowding points will be awarded.

Under Occupation 25Pts per bedroom under occupied

Under Occupation points will only be awarded to our tenants, tenants of other RSLs, Local Authorities and Private Landlords i.e. no under occupancy points will be awarded to owner occupiers.

Please note that in order to free up larger accommodation we will award 50pts per bedroom underoccupied to Wellhouse Housing Association tenants who under occupy their existing property by 2 or more bedrooms.

Medical Needs

The award of medical points based on three medical categories A, B & C and seeks to allow applicants to access housing which is more suited to their medical condition, be this their physical and/or mental health.

Any award of medical points will be made in the context of it improving the quality of life of the applicant by accessing more suitable housing.

The **key consideration** in the award of medical points is not the medical condition itself but whether the medical condition will be wholly or partly alleviated by rehousing. So, the **key test** in the award of medical points is that the tenant or member of the household has a serious medical condition or disability and the present housing is unsuitable.

A medical self-assessment is included within our Housing Application Form and should be completed for each household member to be considered for medical points and submitted at the time of the application for re-housing or when medical problems arise.

Assessments will normally be completed based on your self-assessment. However, the Association will reserve the right to seek medical advice / proof in exceptional cases.

Where supplementary information is required, being mindful of the current stand by GP practices in Glasgow as articulated by the Glasgow Local Medical Committee we will seek so far as is possible to avoid any GP involvement.

Wherever possible and appropriate we will seek evidence and expert opinion from other health professions including Occupational Therapists, Community Psychiatric Nurse, CPN or any appointment letters (ongoing) or reports from such as hospital outpatient clinics or proof of benefit awards.

An applicant or member of their household may be awarded medical points based on the person with the greatest need.

Only 1 medical award can be claimed per application.

Category A 100 Pts

Applicants will be largely housebound in their existing accommodation and suffering a severe health and/or mobility problem.

The default position is that all applicants wishing to claim medical points in this category will only be queued for ground floor property and will not be queued for any property with internal stairs. However, the presence of a stairlift and / or ground floor sleeping and bathroom facilities can be taken into account.

Category B 75 Pts

Applicants will have moderate health and or mobility problems which is adversely affected by current housing.

All applicants wishing to claim medical points in this category with a mobility problem will be offered accommodation at a maximum of first floor level and all on one floor. However, the presence of a stairlift and / or ground floor sleeping and bathroom facilities can be taken into account as can a significant reduction in the number of stairs which the occupant would require to manage compared to current accommodation.

Category C 50 Pts

Where an applicants' current accommodation is causing a significant degree of discomfort to the applicants' medical condition.

Social Needs

Social factors will be taken into account where it can be shown that alternative accommodation could alleviate the circumstances or improve the quality of life of the applicant or members of the family. Cases under this section will be dealt with

sensitively and on their own merits based on the evidence it is possible to gather e.g., Police, Social Work Services, Doctor, Education Services, Hospital Consultant etc.

Domestic Abuse 150 Pts

Applicants who are or have recently suffered from domestic abuse.

For tenants of Wellhouse Housing Association, such applications will be dealt with in line with our Vulnerable Tenants.

In particular, we will adopt a survivor centred approach in dealing with domestic abuse whereby:

- if a person feels they are experiencing domestic abuse we will deal with it under this policy
- We will not require victims to contact the Police or to take legal action before we provide assistance
- We will only take action with the victim's consent. The exception to this general rule is where we consider a child is at risk in any situation or if there is a high risk of serious harm to anyone involved. Where a person is identified as the victim of domestic abuse, any interaction with them will be guided by best practice guidelines

In addition, our approach will be one driven by the victim's choice and where appropriate, and with consent, we will seek to prevent homelessness and move the perpetrator. If this is not possible, we will use the allocations process to prioritise the victim and their family to a new home.

When the victim requires emergency rehousing, WHA will provide advice and assistance on accessing emergency accommodation from Glasgow City Council.

Harassment 150 Pts

Applicant/s or members of their household suffering from ongoing or recent harassment.

Harassment is defined as 'unwanted conduct by one person that causes distress and alarm to someone else.

WHA will provide general advice and assistance on dealing with harassment to applicants. Victims may have a range of options about what to do next because there are different laws to protect victims in different situations. You may have to decide what to do based on the seriousness of the threat to you. The reason there is lots of different law is because it covers very specific types of harassment.

Examples include but are not limited to:

- Harassment could be unwanted conduct related to a relevant protected characteristic (age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, marriage and civil partnership or pregnancy and maternity), which has the purpose or effect of violating an individual's dignity or creating an

intimidating, hostile, degrading, humiliating or offensive environment for that individual. It may also relate to other personal characteristics such as trans identities including non-binary, weight or social status.

- Harassment could be threatening or abusive behaviour. Someone can be charged with an offence after only one incident of that behaviour. The person may be prosecuted under the Criminal Justice and Licensing (Scotland) Act 2010.
- Harassment could be racially aggravated. There are specific offences that relate to racial aggravation. It requires two instances of the behaviour for someone to be charged with an offence. You would need to report this to the police to do something about it.

Looked After Young People 100 Pts

Applicants are a young person (up to 25 years of age) and who currently or recently were looked after and accommodated by a local authority and are now ready to move on to their own accommodation.

Leaving Long-Term Care 100 Pts

Applicants that are currently living in a care setting such as a long-term hospital or other institution and need to move to alternative accommodation.

Merged Household 50 Pts

Where two tenants of Wellhouse HA wish to move to other accommodation together these additional points will be awarded to assist facilitate such a move and to free up accommodation.

Relationship Breakdown 20 Pts

Partners who now want to live separately, as a result of their relationship breaking down.

Employment 20 Pts

Applicants who need to move to the Wellhouse area as a result of an offer of employment nearby.

Moving to Wellhouse Area to Provide or Receive Care and Support

When re-housing within the area, would allow the applicant to give support to / or receive support from a tenant/resident already living within the Wellhouse area. This could include but is not limited to cases of long term illness, disability, frailty or social isolation.

Category A 20 pts

Will be awarded to applicants providing or receiving essential care and support.

Category B 10 pts

Will be awarded to applicants providing or receiving necessary care and support.

Other Factors

For transfer applicants only, to make best use of stock, there will be two other factors we will consider:

1. Move Within a Close

Where an existing tenant expresses an interest for a move within a close, we will allow this to happen prior to considering all other applicants, due to equivalency. The resultant property from such a move will then be let in the normal way

2. Aspirational Move

Where an existing tenant expresses an interest to move from a flat to a house within the Wellhouse area we may allow an aspirational transfer provided they have been living continuously within their tenancy for a period of 5 years.

As there is no housing 'need' element, the application will be placed on the transfer list with no points. When a suitable property becomes available for offer to an aspirational transfer, it will be offered to the person who has been on the list the longest or in the event of two or more applicants with the same date of application to the applicant who has the longest length of tenancy.

Whilst we will facilitate an occasional move under this category, to keep a balanced community and best use of stock, such moves will come from the Transfer Quota, will be limited each year and each let reported to our committee.

3. Exceptional Circumstances

Where existing tenants are living in larger homes than they require and this is causing financial hardship as a result of heating or maintaining the property, or where Housing Benefit does not cover the full rental charge and rent arrears are accruing which may lead to eviction, or where aspects of the property are not able to be accessed due to mobility issues, we may allow a transfer to a smaller property. This would make best use of stock while alleviating the demand for larger housing.

Priority of Applicants

The decision on who is allocated a house and when will be determined by the priority given to the circumstances of the applicant (i.e., the number of points an applicant is awarded), taking into consideration the size and type of the accommodation required, and availability or turnover of stock.

Where two or more applicants have the same number of points the deciding factor will normally be decided by the date of application i.e., the known length of time the applicant has been in housing need.

This will only become the deciding factor where the available property:

- Matches the stated preferences of the applicants
- The size and suitability of the property in relation to the needs (including medical) of the applicants' household
- Making best use of stock in relation to promoting a balanced and stable community within the Wellhouse area

Offers

Wellhouse Housing Association will not normally place a limit on the number of offers that will be made to applicants. However, after each refusal a discussion will take place with the applicant to review their application, particularly on their house types chosen and areas/ streets within Wellhouse, to ensure that the applicant has a realistic understanding of their rehousing prospects and we are better able to match needs on a subsequent offer.

Wellhouse HA reserves the right, where it considers reasons for refusals to be unreasonable and the applicant makes no changes to their application as a result of the refusal to suspend an application from receiving further offers for a 3-month period.

Criteria for Admission to Housing Lists

Homeless

As noted above access to this priority list will only be granted once a Section 5 has been received and accepted by Wellhouse HA.

Transfers

Tenants of Wellhouse Housing Association can apply for a transfer provided they meet the following criteria:

- There is no more than one month's rent outstanding prior to transfer and an arrangement to clear it is in place at point of offer
- Any outstanding recharges do not exceed the equivalent of one month's rent with a satisfactory arrangement to clear in place prior to offer
- There are no ongoing actions regarding anti-social behaviour, specifically a live notice; a recent Acceptable Behaviour Contract (ABC) or Unacceptable Behaviour Notice (UBN) or a live Anti-Social Behaviour Order (ASBO).

Tenants who have been allocated the correct size of house for their needs but who later require a larger house may only claim overcrowding where the declared household on the Housing Application matches the household members recorded by the Association.

Waiting List

In accordance with legislation, certain factors must be ignored by landlords when assessing applicants access to the housing register. These factors are:

- Length of time applicants have lived in the area
- Housing debt not owed by applicants, for example, rent arrears owed by a partner
- Housing debt now repaid
- Any non-housing debt such as council tax
- Age of applicants unless under the age of 16
- Applicant's income or property, including income or property owned by other household members
- Any rent arrears where the amount is not more than one month's rent and or where the applicant has been maintaining an arrangement for paying the arrears for at least three months and continuing the payments.

Whilst these factors do not affect an applicant gaining access to the housing register, there are factors that can affect the status of an application. These include:

- Any rent arrears where the amount is more than one month's rent and or where the applicant has not been maintaining an arrangement for paying the arrears for at least three months
- If you have been acted anti-socially within the last three years
- If you own a property.

Suspension of an application

Suspension of an applicant will follow the statutory grounds set out in the Housing (Scotland) Act 2014. Suspension of applicants will be for up to 12 months. Suspended applicants will be advised of the reasons for the suspension, the period of suspension and when the position will be reviewed. They will also be advised of their right to appeal the decision. This is a separate process from the Association's Complaints Policy/Procedure.

We will look at other cases (not statutory grounds) on an individual basis and determine whether it is reasonable to suspend that applicant. The Association may suspend an applicant for any of the following reasons:

- The applicant knowingly supplied false information either on their application or at subsequent interviews. If this becomes apparent after a tenancy is granted the Association may serve a Notice of Proceedings with a view to recovery of possession
- Repeated failure to respond to Association communications. The application will be reinstated after contact from the applicant
- Failure to advise the Association of any change in family circumstances or change of address. In this case a new application form would have to be completed

- Following receipt of an unsatisfactory tenancy reference and where the issues remain unresolved including rent and other housing debt, anti-social behaviour and other tenancy breaches
- The household on a transfer application does not match the recorded household. The application will be suspended until the matter is resolved in accordance with related tenancy change policies

Contextual Information

Wellhouse Stock

The Association has a total stock of 792 houses or flats, (plus 5 supported bedspaces let out with this policy by GCC's Health and Social Care Partnership (HSCP))

Apt Size	House Types	Number
2	Main Door	42
2	Ground Flats	4
2	Other Flats	6
2 Apt Total	52	
3	Main Door	129
3	Houses	46
3	Ground Flats	80
3	Other Flats	242
3 Apt Total	497	
4	Main Door	25
4	Houses	92
4	Ground Flats	11
4	Other Flats	28
4 Apt Total	156	
5	Main Door	2
5	Houses	79
5 Apt Total	81	
6	Houses	5
6 Apt Total	5	

Annual Turnover

Over the last three years ending on March 2021, our turnover has averaged:

Apt Size	2018/19	2019/20	2020/21	Average
2	3	3	3	3
3	38	27	20	28
4	7	4	3	5
5	4	1	1	2
6	0	0	0	0

Wheelchair/ Ambulant disabled/ Disabled Adapted & other Specialist Housing

Wellhouse HA only has a limited stock of such housing, currently 22. These properties have a very low turnover and waiting times for this type of house may be lengthy.

When such properties become available, they will be matched with the applicant who will benefit most from the adaptation/specialist housing.

Re-housing Offenders

Multi-Agency Public Protection Arrangements (MAPPA) were introduced as a result of the Management of Offenders etc (Scotland) Act 2005. We manage any allocations to offenders covered by the MAPPA arrangements at a senior level and in consultation with relevant agencies such as the police and Social Work Services. All aspects of this policy may not be applied in making any such offer and any offer of housing will be dealt in line with MAPPA (Multi Agency Public Protection Arrangements) Protocols which cover the Glasgow area

Outcomes and Targets

The Association will seek to achieve the following:

- Lets will be made in accordance with the policy while also considering the best use of stock in relation to promoting a sustainable community within the Wellhouse area.
- Produce an annual lettings plan, setting out targets and priorities for the following year
- Lets will be made as far as possible within the targets set annually by the Management Committee

Responsibilities and Delegated Authority

Our Housing Officers are responsible for managing lettings on a day-to-day basis.

9. Monitoring and performance

Our Housing and Customer Services Manager monitors our performance against service standards for processing allocation forms and use of suspensions/cancellations and we report quarterly to our Management Committee on our lettings outcomes against targets/quotas set by them annually, to ensure we are meeting the objectives set out in this policy.

10. Consultation

We aim to deliver excellent services, which respond to local needs and reflect what is most important to our customers.

To do that we need our customers to tell us how well our policy is working and help us to make the changes which will improve it. In line with our Customer Engagement and Participation Policy:

- We make it easy for customers to give us their comments and views - face to face, by telephone, e-mail, online or in a letter.
- We commission formal independent tenant satisfaction surveys on a continuous monitoring basis carried out every three months.
- We consult our Customer Opinion Panel
- We publish the targets we set
- We publish how we have performed against those targets

We use customer feedback to review our policies and talk to customers about the changes we are making.

11. Complaints and Appeals

If you believe we have made an incorrect decision while assessing your application for housing, we have a clear procedure for dealing with appeals about decisions we make during the application and allocation process. If you are unhappy about a decision made, you should first appeal to one of our Housing Officers. If you are still not satisfied, you can then appeal to the Housing and Customer Services Manager.

We have a separate complaints policy and procedure. Leaflets and copies of the complaint's procedure are available from the Association's office and on our website. We also provide information on how our customers can make a complaint to the Scottish Public Services Ombudsman (4 Melville Street, Edinburgh EH3 7NS, telephone, 0800 377 7300) and how to contact the Scottish Housing Regulator.

The Ombudsman will not normally deal with complaints unless customers have followed the Association's complaints' procedure.

12. Review timeframe

The policy will be reviewed every three years, or sooner, in response to a change in legislation or circumstance. The Housing and Customer Service Manager will be responsible for reviewing the policy.

13. General Data Protection Regulations

The organisation will treat personal data in line with our obligations under the current data protection regulations and our own GDPR Policy. Information regarding how data will be used and the basis for processing data is provided in Wellhouse HA's privacy notice.

Report to: Carol Hamilton

From: Doctor Stewart Montgomery

Date: 21 March 2022

Re: Equality impact assessment of the Draft Allocation Policy

The report below summarises key themes that have been identified through the equality impact assessment of the Draft Allocation Policy.

These themes are derived from the equality impact assessment procedure that you will receive as part of the equality strategy. This covers both an intrinsic and extrinsic assessment.

Intrinsic equality impact assessment

This involves an audit of the policy document itself and covers the following issues:

- appeals and complaints;
- font and type size;
- equality statement;
- accuracy in terms of law;
- appropriate language use:
- plain language;
- positive action;
- performance management (equality issues);
- rules; and
- staff training.

Appeals and complaints

The policy includes a section on appeals and complaints; this is positive as it serves to take account of human rights issues, that is, enabling individuals to seek independent redress.

Font and type size

The font used is Arial which is acceptable in terms of recognised good practice with the option to have the document provided in other formats; this could include font and type size.

The type size used is only eleven point which does not meet good practice standards. One effect of this is to make the policy less accessible, in particular to individuals with visual impairments.

Equality statement

An equality policy statement is included but this will require to be replaced by the one contained in the new equality policy.

Accuracy in terms of law

Ensuring accurate legal information is a key equality theme, enabling individuals to be consulted properly and to make informed decisions.

On this point, the present draft policy does not meet required standards. See the attached audit for detailed commentary on gaps between the law and what is contained in the document.

Appropriate language use

Appropriate language use is central to promoting respect for other people; it is a core equality issue. The document uses appropriate language in parts, but on various occasions, it lapses into using inappropriate terms reflective of the medical model of disability. This is critical as the equality policy promotes the use of the social model to promote the rights of disabled people. Comments are noted clearly in the attached report on issues to be addressed.

Plain language

A central commitment – both from the perspective of the guidance standard listed in the allocation policy and an equality perspective – is to use clear and plain language. This standard has not been met as is evidenced by the numerous parts where sentences are too long (measured against Plain English Campaign standards). jargon and/or abbreviations are used. In certain sections, the text is not clear in terms of meaning. Editing of marked sections is thus required.

Positive action

Allocation policy is a strategic policy and one that is suitable for consideration of positive action programmes to promote the interests of people with protected characteristics. Indeed, this is an example of mainstreaming equality themes into policy documentation. A section on positive action should be considered, either as a separate content topic or within an equality section.

Performance management (equality issues)

There is a section covering performance management but there no details on what is being monitored. In the monitoring framework, it is essential to include performance indicators that relate to the protected characteristics. For example, numbers of disabled tenants or people from minority ethnic groups who have applied for transfer. Indicators should, ideally, cover quantitative and qualitative issues.

Rules

The policy contains specific rules and it is important that these are subjected to more detailed assessment to ensure that they do not give rise to particular forms of unlawful discrimination. It is apposite, therefore, to include a statement that the effects of rules in relation to discrimination will be monitored.

Staff training

It would be beneficial to have a staff training section within the allocation policy contents as staff training is vital if allocation policy objectives are to be met in practice. This training would focus on equality related issues concerning the allocation policy and allocation procedures. This is central, indeed, to the mainstreaming of equality objectives.

Extrinsic equality impact assessment

This involves an assessment of possible effects of the policy document in relation to people with the protected characteristics. If the policy complies with law and guidance (following the above assessment, negative effects are likely to be minimal.

Protected characteristic**Age****Positive**

The policy is mainly positive in terms of promoting age equality. For example, the policy contains provisions to restrict certain types of lets to people on age related grounds, as well as provisions to assist tenants to transfer from larger accommodation. This could involve older people, an issue that can be examined in more depth when the equality data collection process is implemented.

Action required

As the comments make clear, more detail in terms of allocation and age is required.

Disability**Positive**

The policy is positive in terms of promoting disability equality by focussing on the house being the source of points being awarded.

Action required

Despite the point above, the policy does not promote the interests of disabled people in various ways. It does not, for instance, use social model of disability language that is central to the new equality policy. The impression one gets on reading the document is that disabled people are those with medical conditions. The changes noted in the attached report should, therefore, be implemented.

Protected characteristic**Gender reassignment****Positive**

There is coverage of this issue within the policy, for example, the section on harassment forms.

Action required

This will require to be developed further in the allocation procedures such as the application form and the equality form in which people can be allowed to define their status.

Protected characteristic

Marriage and civil partnership

Positive

This issue is touched upon in the section on relationship breakdown in which specific housing advice and information can be provided.

Action required

It is important within the policy to examine in more detail relationship breakdown issues in relation to homelessness.

This will require to be developed further in the allocation procedures such as the application form and the equality form in which people can be allowed to define their status.

Pregnancy

Positive

There is a reference to pregnancy within the equality statement.

Action required

The policy document states that: "Where overcrowding will occur as a result of pregnancy, a medical certificate will be required, and points awarded 12 weeks prior to the date of confinement."

This could be enhanced by a supportive comment, within the allocation procedures, such as:

"We will accept the certificate in various formats to suit the needs of individual pregnant women. In the case of disabled pregnant women, we will make reasonable adjustments to service delivery to address their needs."

Race

Positive

This is covered in relation to harassment. There is also the commitment to produce the allocation policy in different formats and other languages.

Actions required

Various actions need to be considered. Firstly, the allocation procedures need to cover the issue of appointing interpreters, as well as adjusting services so as not to discriminate.

Secondly, performance indicators need to be developed to include monitoring of lets in respect of minority ethnic groups, as well as incidents of harassment and/or unlawful forms of discrimination.

Finally, having a positive action section would enable initiatives to promote race equality being developed based on assessment of equality data.

Religion/belief

Positive

This is covered in relation to harassment but is not really dealt with elsewhere.

Actions required

Two key actions need to be considered. Firstly, the allocation procedures need to cover the issue of delivering services that address the needs of people of different religion and those of other beliefs, as well as adjusting services so as not to discriminate. For example, the importance of avoiding meetings on religious holidays.

Secondly, and this is an issue that should be considered as an insertion within the allocation contents section, staff should be provided with appropriate training on the people's different needs.

Sex/gender

Positive

The allocation policy contains positive rules in relation to sex related issues. For instance, the age limit in respect of which people of the opposite sex is to a higher standard than existing statutory provisions in relation to overcrowding.

The section on harassment also includes reference to sex.

Actions required

In order to promote the interests of people on grounds of sex, various actions can be considered within the allocation procedures. These could cover the following:

- comprehensive advice and information services to women and men, including the establishment of a relationship breakdown policy;
- assessment of tenancy and housing list household profiles to identify if positive action initiatives might be required to promote access of women (and men); and
- evaluation of what specialist services might be needed, for example, advice and information to women experiencing domestic abuse (and linking this to equality themes such as disabled people, people from minority ethnic groups and so on).

Sexual orientation

Positive

The section on harassment also includes reference to sexual orientation but no other section covers this issue.

Actions required

In order to promote the interests of people on grounds of sexual orientation, various actions can be considered within the allocation procedures. These could cover the following:

- comprehensive advice and information about Association services to lesbian women, gay men and so on, including dealing with harassment and discrimination;
- assessment of tenancy and housing list household profiles to identify if positive action initiatives might be required to promote access to housing for people of different sexual orientation; and
- ensuring that staff are trained on issues relating to sexual orientation such as using appropriate language and exploring stereotypical assumptions (to lay them to rest).

Note: Another positive element within the allocation policy is that it promotes housing options to people who cannot afford to pay existing housing and housing related costs. This promotes the interests of people who are socially excluded, that is, many working-class households.

Summary

The present allocation policy contains a range of positive elements to support the equality mainstreaming process in relation to the protected characteristics. The detailed examination has indicated a number of clear gaps that require to be addressed; much of this can be achieved through the allocation procedures.

Management Committee	28 April 2022
Agenda Item	8
Title of Paper	Rent Arrears Update
Author	Carol Hamilton, Housing & Customer Service Manager
Attachment(s)	N/A
Executive summary	<p>The following information is recorded at the end of Period 12, 31st March 2022:</p> <ul style="list-style-type: none"> • Gross current tenant rent arrears are £279,282– 8.31% of annual income • Net arrears are £258,336 – 7.69% of annual income • Former Tenant's arrears are £48,451 • Rent collection is currently 101.39% (cumulative 12 months to end March 2022) • 92 tenants (11.62% of all tenants) owing £1,000+ now owe £188,570 collectively – 67.52% of current arrears and 5.61% of annual rent income. • 58 (7.32% of all tenants) of those owing £1,000+ are UC recipients • 33 tenants (4.17% of all tenants) owe £2,000+ • The number of tenants claiming UC is 249 (31.43% of tenants). • The amount of UC arrears figure is £156,545.00 (56.05% of the current arrears) or (4.66% of annual income)

FOR INFORMATION

1 PURPOSE

- 1.1 To update Committee on the arrears position

2 RECOMMENDATIONS

- 2.1 That the update on the arrears position be noted

3 BUSINESS PLAN, VISION AND VALUES

- 3.1 The production of an arrears report is consistent with:
- our strategic objective 5: to maintain good governance and financial management and:
 - our values of excellence and accountability

4 BACKGROUND

- 4.1 Committee have requested regular arrears reports

4.2 This summary forms an update to the end of March position.

5. MAIN ISSUES:

5.1 Since the last Committee update, gross current tenant rent arrears have reduced by £14,175 to £279,282.

5.2 During the same period, net current arrears have reduced by £21,220 to £258,336.

5.3 The number of tenants in arrears across most bands still remains fairly static although the numbers in the higher bands are reducing. 92 tenants owe more than £1000, which is 4 less than reported at last Committee meeting, and those owing more than £2,000 have decreased by 4 to 33.

5.4 The Former Tenant Arrears (FTAs) have reduced by £6,352.

5.5 Universal Credit (UC) is now claimed by 249 of WHA households and UC arrears accounts for £156,545 (56.05%) of the total gross current rent arrear).

5.6 The Housing Team have been focusing on reducing the UC debt by ensuring that affordable arrangements are made for those with outstanding balances as well reducing Former Tenant Arrears. The current figures include grant funding of £7,817 from Glasgow City Council for our share of the Coronavirus (Covid-19) Tenant Grant Fund, as well as the write-offs of £7,909.97 from current tenant arrears and of £10,952.92 from former tenant arrears which were approved at the last Committee meeting.

6. DISCUSSION

6.1 At the previous meeting it was agreed that the Association would explore the option of selling debt to an external company. Normally debt is sold at around 15% of its value and the buyers use a variety of methods to recover the debt they have bought, some of which may cause reputational damage to WHA and distress to our current and former tenants. The preferred option would be to continue with the tracing of former tenants or seeking wage arrestment's where appropriate and Committee are asked to discuss this approach.

6.2 Committee are asked to note that a decree for eviction was granted in March for £4,721. The tenant has since ended his tenancy. A 'technical' eviction will take place in his absence and we will continue to seek payment for the amount outstanding as well as legal costs.

6.3 Checks have been made on all tenants who pay by Standing Order to ensure that their payments cover the new rent cost. Tenants have been contacted where appropriate.

7 REGULATORY, LEGAL AND CONSTITUTIONAL ISSUES

7.1 ARC report will include our performance.

7.2 Regulatory and current legislation dictates that legal action will not be pursued where arrears have occurred solely as a result of the Covid-19 situation.

8. FINANCIAL IMPLICATIONS

- 8.1 Dealt with in the body of the report.

9 KEY RISKS

- 9.1 Failure to robustly manage arrears is a failure to deliver on core KPI and reduces income to the Association. Mitigation – persistent and consistent application of policy and staff performance management.
- 9.2 Any rise in evictions may lead to reputational damage. Mitigation- use only as a last resort and adhere to Coronavirus (Scotland) Bill.

10 EQUALITY, DIVERSITY & HUMAN RIGHTS IMPLICATIONS

- 10.1 The Rent Management Policy has been written with our commitment to diversity included.

Management Committee	28 April 2022
Agenda Item	19
Title of Paper	Operational Update Report
Author	Management Team
Appendices:	1. EVH members update – pay negotiations

FOR INFORMATION AND DECISION

EXECUTIVE SUMMARY:

1. Director – Main Issues

The Director reported in closed session.

2. Housing & Customer Services Manager – Main Issues

- The collection of rent arrears continues to be a priority and an update is included in a separate report.
- The consultation on the draft Allocation Policy concluded on 31/03/22 and details are included in a separate report
- While the collection of rent arrears is still very much a priority task, estate management issues have escalated significantly and are taking up a great deal of Officer's time. If approved, the new Allocation Policy will also require dedicated resources to implement the new process. To ensure that all functions are carried out correctly in accord with the Homemaster system, each of the 3 Housing Officers will each concentrate solely on one of these functions for the coming weeks.
- It was agreed that options for the use of CCTV in backcourts and other common areas would be explored to minimise fly – tipping, dog fouling and anti-social behaviour. Initial enquiries have begun with providers of redeployable and static cameras and a full report including costs will be provided at a future meeting
- The Income Advice Service was accessed by 232 tenants between 1st April 2021 and 31st March 2022, financial gains for the period are £733,031.36. (The figure may increase as more benefit claims are awarded for past periods)
- The Income Advice Officer (IAO) reports that tenants are really struggling to cope with the increased costs of living crisis. The IAO reports that from 1st of April 2020 to 31st March 2021 the Association made 10 referrals to local foodbanks over the entire year. From 1st of April 2021 to 31st March 2022, the Association has made 24 foodbank referrals with 22 of those referrals made from Dec 2021 to March 2022. The IAO continues to support tenants to access benefits and crisis support.

Trust Honesty Integrity Excellence Accountability Sustainability

- The Scottish Social Housing Fuel Support Fund has now ended. The £6,000 fund assisted 73 households experiencing fuel poverty within the community. 32 of the 73 households consented to be referred to Home Energy Scotland for further energy advice / energy debt advice. Prepayment meter users were the highest awarded group, of the 73 households awarded a payment, 53 households were prepayment customers. The IAO will be submitting evaluation feedback reports to the funder this month.
- The STV £3000 Winter Fund has now been distributed to families experiencing poverty within the community. The funding was used to help families purchase food, clothing, and white goods. Cash awards benefitted 63 children across 25 families. The funding was limited, and the IAO prioritised the following groups: Lone parents, families with a mother under 25, larger families, families with a disabled adult/child, families with a child under 1 year old and ethnic minority families. The IAO will be submitting evaluation feedback reports to the funder this month.
- The IAO continues to support tenants by providing benefit advice and crisis support as well as supporting the Housing Officer with arrears cases and providing Universal Credit early intervention support for new claims. We now have 249 UC recipients.
- The Digital Support Fund has £193.99 remaining. Thirty devices are still on loan as most people have internet access of some sort at home but lack devices. We continue to support two of our tenants without internet access, we agreed to continue to support them with access to 6GB of data per month until the Digital funding has been depleted. We awarded one mobile phone to a tenant in February 2022, the tenant was having difficulty engaging and did not have access to a mobile phone. The tenant can now engage with the Housing Officer.
- The Sustainability Policy is due to be reviewed and was scheduled to be reported to Committee at the April meeting. Since this is a protracted piece of work, the Service Improvement Officer intends to work with each member of the Senior Management Team over the coming weeks to ensure that each part of our service delivery is thoroughly reviewed and that the final draft of the Policy reflects current and future considerations. Committee are asked to **approve** that a final draft will be presented to Committee in August

3. Assets & Maintenance Manager – Main Issues

- Windows and Doors, Sidey are on site and are 50% through the contract.
- Planned maintenance 21/22 - we have managed to install 36 Kitchens, 31 bathrooms and 11 major adaptations consisting mainly of Bathrooms.
- Electrical inspections/ smoke detectors 21/22 - we carried out 225 electrical inspections and upgraded 163 smoke detectors.
- Estates Wardens - we are looking at options to assist the Wardens as we have not been able to fill the existing vacancy, this would allow the Wardens to focus on their main tasks of estate maintenance and have an external contractor collect the bulk on a weekly basis, possibly reintroducing bulk pickup points. This would be funded by the salary saving of running with 3 Wardens for the next 6 months to trial how it operates.

- Asset Management Policy. - The Asset Management Policy is due for review as part of our revised business plan. Committee are asked to **approve** that the policy be submitted for approval in August. It is important to recognise that it is not a case of simply developing the business plan and then constructing an asset management strategy. It is a process where the development of the asset management strategy is an integral part of business planning and each feed from and into the other.

4. Finance & Corporate Services Manager – Main Issues

- The majority of files and folders have now been migrated to a cloud server. Further work will take place to review and remove any files and folders that are no longer required. This work will be carried out by the staff team over the coming months.

The old Housing management system (SDM) is being wound down and by 1st July will be fully removed from our servers. It is therefore vital that the finance department have all work on the year end accounts completed on SDM well before the 1st of July deadline.

Once the SDM system has been removed from the servers, the servers within the HUB will be decommissioned as all data will be stored within the cloud.

Additional backups within the cloud are carried out automatically and stored within a different location should they be required. The use of the cloud servers enable access to information and additional levels of security has been introduced to ensure data is secure. A further update will be provided at subsequent meetings.

- Homemaster project went live on Thursday 7th April 2022. The staff are using the system and gaining confidence in its use. As the month continues we will become more familiar with package and its reporting capabilities. Further updates will be provided at subsequent meetings.
- Work continues on the year end accounts ready for the external auditors who will be on site on 1st August 2022 to commence their field work. It is their preference to have a mix between on-site work and remote working during the audit. The March 2022 accounts will be presented at the May 2022 meeting.
- Details of the internal audit program for 2022/23 will be presented by Wylie Bissett to the Audit & risk committee on 19th May 2022
- The negotiations through EVH continue with regards the pay award for staff and at time of writing this report no agreement has been reached. A proposal was passed to Clare Monteith as Chair of the staffing committee for consideration and to respond.
- The following policies are due for review and will be presented to the Audit & Risk committee meeting on 19th May 2022
 1. Risk management Policy
 2. Entitlement, Payments & benefits Policy
 3. Donations Policy
 4. Staff expenses Policy
 5. Committee Expenses Policy

Trust Honesty Integrity Excellence Accountability Sustainability

- A formal request for flexible working arrangements has been granted to Sandra Davidson to work 3 days per week from home.

8th March 2022

EVH Member Update

By Email

Dear Colleague

2022 Pay Negotiations

I am writing to provide you with an update on the pay negotiations further to the latest JNC meeting which was held last week. I will take this opportunity to outline the key factors considered by the employers in negotiations and to outline the current position.

The key factors put forward in negotiations are outlined below:

- Affordability is critical and the impact that any agreement will have on the cost of living for the tenants of the RSL's we represent. Tenants are also affected by the rising cost of living and in many cases can least afford this.
- Overall pay rises to the EVH salary scales since 2005 have tracked higher than the CPI increases since that time. EVH employers have given annual inflationary increases while many other employers have frozen salaries during that period.
- EVH salary scales recognise the National Living Wage set annually by the Living Wage Foundation. This will see the bottom points of the salary scales inflating to £9.90 per hour effective from 1st April 2022.
- Our employees are offered a comprehensive set of terms and conditions which give a generous leave entitlement, sickness scheme along with a host of other benefits.
- The increasing costs of pension provision have an impact on employers.

We are also keen to recognise the impact that the current high level of inflation has on employees and offer a cost of living increase which recognises this.

At this point we have put an offer to the union which we consider to be in line with all of the above points. We await their response and they have agreed to provide this by Monday 14th March 2022. If the union do not accept this offer the next stage of the process will be to engage with ACAS on this matter.

We will keep you up to date with progress.

Yours sincerely



John Ferguson MBE JP (ret)
Chair of EVH negotiating Committee