

## Homes and Neighbourhoods - Fair, Inclusive and Accessible Services Commitment

This policy affects all tenants and leaseholders including TMO and PFI1 tenants and leaseholders.

Related policies / procedures: All Homes and Neighbourhoods policies and procedures will align with this commitment.

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### 1.0 Aim

- 1.1. To provide fair, inclusive and accessible services for residents and their household, based on their individual needs and personal circumstances.

### 2.0 Introduction

- 2.1. This policy has been created with residents, services across Islington Council, partnership services, Islington Tenant Management Organisations, registered housing providers in Islington and the voluntary and community sector.
- 2.2. Our Islington Together 2030 corporate plan sets out how we plan to make a more equal future. In tackling inequality, we will focus on:
  - Poverty and affordability - Making sure everyone has the financial means to access what they need for a good life.
  - Quality of life - Making sure everyone has the resources to live, learn, work and spend time in nurturing environments.
  - Power and influence - Making sure everyone has a real say over decisions that affect them and their communities.

Our five priorities are:

- **Child-friendly Islington**  
By 2030, Islington will be a place where all children and young people are rooted in a community where they feel safe, can thrive and are able to be part of and lead change.
- **Fairer together**  
Fairer Together is our approach to working with the community to tackle inequality through high quality early intervention and prevention.
- **A safe place to call home**  
We are determined that by 2030, everyone in Islington has a safe, decent and genuinely affordable place to call home.
- **Community wealth building**  
Community Wealth Building is a way of tackling economic inequality and creating an economy that works for everyone.
- **Greener, healthier Islington**  
By 2030, we want our communities in Islington to live healthy and independent lives and enjoy London's greenest, cleanest and healthiest neighbourhoods.

2.3. This Service Commitment forms part of the council's commitment to providing a more equal future for Islington residents by delivering fair, inclusive and accessible services to residents. We continue to work towards making our standard services suitable for a wide range of our residents, whilst recognising that differential support based on need, is sometimes required to achieve the right outcome. We recognise that fair access requires services that can be flexible to individual needs when our standard service offer does not meet the needs of a resident or their household, because of their particular circumstances, mental or physical health conditions or communications needs.

2.4. Our 'Fair, Inclusive and Accessible Services Commitment' sets out our approach to adapting our services to meet specific needs of our residents and their households, where residents have individual needs or experience specific barriers. There will be limits in our ability to adapt our services, related to available resources, such as money, availability of alternative or temporary accommodation and support services for vulnerable people, as local government and the voluntary sector work within a limited financial setting.

### **3.0 Context and Legal framework**

- 3.1. Islington Council manage approximately 25,000 tenanted properties and 10,000 leasehold properties.
- 3.2. Approximately there are 56,800 people living in the tenanted properties and approximately 12,700 leaseholders (who are named on the lease).
- 3.3. There are approximately 15,700 people on the council's waiting list to be housed in Islington. Demonstrating high levels of unmet need for homes or alternative homes within the borough.
- 3.4. The Regulator of Social Housing is in consultation on the Consumer Standards, the final set of standards are anticipated to be applied from April 2024. "The Transparency, Influence and Accountability Standard – requires landlords to be open with tenants and treat them with fairness and respect so that tenants can access services, raise complaints when necessary, influence decision making and hold their landlord to account."
- 3.5. The Housing Ombudsman published their report - *Spotlight on: Attitudes, respect and right. Relationship of Equals* in January 2024, highlighting the need for social landlords to set out their approach to better supporting the needs of their residents. This followed from determinations and paragraph 49 investigations into landlords (including Islington Council', where landlords were falling short of their expectations.
- 3.6. Housing Ombudsman states "Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests."
- 3.7. The Equality Act 2010 and Public Sector Equality Duty.

- 3.8. Housing Act 1996 and the Homelessness (Priority Need for Accommodation) (England) Order 2002
- 3.9. Landlord and Tenant Act 1985
- 3.10. Human Rights Act 1998
- 3.11. Housing Act 2004 - Health and safety standards for rented homes
- 3.12. The Care Act 2014
- 3.13. Homelessness Reduction Act 2017
- 3.14. Mental Capacity Act

#### **4.0 Protected characteristics and personal circumstances**

- 4.1. The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. The protected characteristics listed in the Equality Act 2010 are: age, disability, being married or in a civil partnership, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
- 4.2. Section 149 of the Equality Act 2010 outlines the Public Sector Equality Duty, stating that public authorities and organisations carrying out public functions need to “think about how they can improve society and promote equality in every aspect their day-to-day business. This means that they must consider and keep reviewing, how they are promoting equality in decision-making, internal and external policies, procuring goods and services, the services they provide, recruitment, promotion and performance management of employees.”
- 4.3. This policy recognises the protected characteristics listed and the councils public sector duty but acknowledges that this does not mean that someone or household are inherently vulnerable, instead, it’s important that contact and decisions are made with the resident to make sure services are accessible and fair and make sure residents have an equal outcome to other residents.
- 4.4. Personal circumstances refer to an individual or household that have an experience specific to them. These experiences could have occurred in the past, passed down through generations, current and indirect. Again, this does not necessarily make them inherently vulnerable but must be taken into consideration when delivering a service to make sure its level of impact is understood.
- 4.5. Other considerations include if they are short or long term, complex and multiple, and occurring at the same time, which may increase the likelihood of a resident and household needing additional support.
- 4.6. Ultimately, protected characteristic and personal circumstances should be taken into consideration by services in the planning, delivery and review of services.

## 5.0 Policy Objectives

- 5.1. To focus on achieving equal outcomes for residents through recognising residents as individuals who have different experiences, circumstances and changing needs, and providing services that meets those needs. This includes refugees, migrants and residents seeking asylum, prospective tenants, sole tenants, whole households and leaseholders.
- 5.2. For residents to receive services that are fair and easy to access no matter what their circumstance, that take into consideration the individuals and household views about their wishes and what support they feel they need and for this to be provided at the right time and by the right team.
- 5.3. The policy is in line with the commitments in the council's Fairer Together, 2030 commitment, Islington Welcomes and Borough of Sanctuary.
- 5.4. We will work with relevant services and partner agencies to meet the needs of the resident, making referrals to statutory and support agencies where appropriate, making safeguarding our top priority.
- 5.5. We aim to ensure that residents are satisfied:
  - We have understood their query and are dealing with it appropriately.
  - We have made ourselves aware of their circumstances and context of situations they are facing.
  - We hold the most relevant information on them to provide a fair and accessible service, using opportunities when they contact us to confirm the information we hold is accurate and up to date.
  - We know their contact preferences and translation needs.
  - We have trained officers, who know the right processes and teams that are in place to offer support and make decision early on, to prevent them being unfairly treated or unable to access the service they need.
  - We work with residents and communities to support them to live well and thrive, making sure that we provide support where needed and take enforcement action where required.
  - We use the range of tools available to us to support residents as individual, households and families.
  - We will be accountable to them for our actions by keeping them up to date on action taken.
  - We have set clear standards and next steps to help manage expectations, helping us to work in together with them.

## **6. Providing fair, inclusive and accessible services**

Definition of the term "vulnerabilities"

6.1. The Housing Ombudsman Service defines vulnerability as:

"A dynamic state which arises from a combination of a resident's personal circumstances, characteristics and their housing complaint. Vulnerability may be exacerbated when a social landlord or the Housing Ombudsman Service does not act with appropriate levels of care when dealing with a resident's complaint... if effective reasonable adjustments have been put in place, the vulnerability may be reduced."

6.2. Residents may need temporary or on-going support to access a service or sustain their tenancy. This may be due to a disability, mental health condition, drug or alcohol misuse or an experience which has a negative impact on wellbeing or feeling safe.

6.3. We recognise that "vulnerable" is not an empowering term and we prefer to use terms like individual needs, additional support, require the delivery of the service to be adaptable and flexible.

Definition of "accessibility"

6.4. The fact of being able to be reached or obtained easily. The quality of being able to be entered or used by everyone, including people who have a disability. The quality of being easy to understand or enjoy. (Oxford Dictionary)

## **7.0 Identifying when support is needed and household circumstances**

7.1. We understand that sometimes it might not be straight forward when identifying if additional support is needed, especially if information about a resident is limited or withheld. In some cases, circumstances for residents can change at any point.

7.2. Staff are trained to notice if a resident may need additional support by asking relevant and sensitive questions, and through spotting signs of potential additional support or circumstances. Discussing this with the resident and their household to confirm what they need. Making sure there is a high level of customer care, being professionally curious and have an understanding of trauma.

7.3. There may be more appropriate times and places where a resident is able or comfortable to share if they need services to be flexible or if they are at risk. Staff will follow safeguarding procedures, work to create a relationship and a safe space to discuss support needs and will ensure that this information is shared appropriately when needed.

7.4. Staff are aware of reporting and referral processes and tools to get the right support at the right time.

7.5. Identify through, but not limited to:

- Housing application
- Sign up or interactions with their new tenancy
- Tenant Management Organisations (TMOs)
- Contact made to a housing or repair officer via any communication channel
- Requesting a repair
- Rent enquiry or recovery
- Home visits
- Via internal/external contractors
- Referral by professional and information sharing
- Self-referral
- Community outreach e.g., homeless outreach, complex needs navigators, contracted agencies, caretakers and concierge etc.

## **8.0 Recording information**

- 8.1. Services will record support needs and circumstances that are clear, objective, relevant and up to date on the resident's record. Making sure this is available to relevant services and that information management, protocols and legal guidance is followed.
- 8.2. Staff use all contact with residents as opportunities to update resident records.
- 8.3. Communication and language preferences are recorded and proactively checked during contact.
- 8.4. Residents are made aware of services, for example: translation.

## **9.0 Services delivered to residents**

- 9.1. The services delivered to residents will:
  - 9.1.1. Identify at the earliest opportunity if supported is needed and will discuss these needs with the resident.
  - 9.1.2. Proactively identify translation requirements and communication preferences, to use translation services and correct communication channels to have successful interactions and identify suitable outcomes.

- 9.1.3. Ask and record relevant and appropriate information related to residents that provide an excellent service, ensuring that it is used to inform our interactions and decision making.
- 9.1.4. Take a strengths-based approach, using language and decision-making that is focussed on the residents and households' strengths, wishes and what support they feel they need within the service offer.
- 9.1.5. Consider resident, household and community impact.
- 9.1.6. Be trauma informed, having awareness and sensitivity to previous and current experiences that may require services to be delivered in a different way.
- 9.1.7. Have professional curiosity, actively listen to residents to get to the heart of the query or service request.
- 9.1.8. Support the use of and make referrals to support services including aids and adaptations.
- 9.1.9. Staff, contractors and third parties who deliver services on our behalf, use and review data proactively to make sure records are up to date, that appropriate contact and delivery of services to residents are based on their circumstance and communication preferences. Making sure that all information that stored on the persons record is taken into consideration.
- 9.1.10. Safeguarding processes are put in place to keep the resident, household and the community safe.
- 9.1.11. Carry out our landlord duty as set out and agreed in the Conditions of Tenancy.

## **10.0 Examples of how this policy works in practice**

- 10.1. If an Islington tenant is having trouble paying their rent, officers will check if they have a vulnerability on our housing IT system or will use their professional judgement and training to find out if they need support. Referrals to support services, like Single Homeless Project, will be made to help the tenant.
- 10.2. Text reminders for repair appointments are sent the day before and operatives call ahead to let residents know they are on their way. There is also a system called Localz that lets the residents know how far away the repair operative is. This can help residents confirm their repair appointment and make plans with carers or support workers. Operatives are also aware of key information relating to resident vulnerabilities and communication needs. For example: making sure they allow time for residents with mobility issues to get to the door, having technology to help them communicate to residents where English is not their first language or require someone that understands British Sign Language to assist.
- 10.3. During a crisis, like flooding, fire or lift breaking down etc. we start our emergency response which includes accessing information on resident vulnerability to make sure we are responding correctly and offering the right support to people. It's important that

this information is accurate and kept up to date. We encourage residents to share this information with us.

- 10.4. When responding to reports of ASB we will consider how the vulnerabilities of all parties may impact the situation. For example, the reporters experience of ASB may be amplified by their vulnerability, just as the behaviour of the perpetrator may be caused by their vulnerability. We will seek to find a solution which reduces harm to the community by looking at the root cause of anti-social behaviour and considering creative solutions to help the person causing ASB to comply with the terms of the Tenancy Agreement and live in their home in a way that does not cause disturbance to their neighbours.
- 10.5. If we know a resident who is deaf or hard of hearing or they inform the council that they have this sensory need, we would work with them to meet their particular translation needs when communicating with us and also ensure they had appropriate arrangement in their home for their heat and fire detection, to keep them safe in their home.

## **11.0 Capacity**

- 11.1. In compliance with the Mental Capacity Act 2005, it is assumed that an adult has full legal capacity to make decisions for themselves and is given all appropriate help and support to enable to make decisions or to maximise their participation in any decision-making process. If a resident is unable to make a particular decision due to lack of capacity the decision in their best interest will be made by the relevant people as set out in the Act.

## **12.0 Implementation**

- 12.1. For this policy to really make a difference we will make this part of our Challenging Inequalities action plan, which will be reviewed quarterly. It will include:
  - 12.1.1. Development of a reasonable adjustments procedure, which will describe some of the ways our services will implement this policy.
  - 12.1.2. Review the process of recording data that relates to residents protected characteristics, personal circumstance and support needs. Including ensuring this information is gathered at appropriate interactions, such as the beginning of a new tenancy. Putting in place appropriate retention and deletion processes to make sure that records held on a resident reflect their current situation.
  - 12.1.3. Review and establish information sharing processes with partners e.g., Children Social Services, Adult Social Care and Tenant Management Organisations etc.
  - 12.1.4. Carry out a "Resident of the Future" forecast for the next ten years, drawing upon the available information around demographics, both locally and nationally.
  - 12.1.5. Continue to deliver training for staff on the Equality Act 2010, customer care, trauma informed practice and information and record keeping. The council making every contact council training, which is essential for all frontline staff, helps embed this approach through encouraging professional curiosity and for support referrals for residents with additional needs. Ensuring staff have the right skills to be aware of and

understand the different needs and support of residents.

- 12.1.6. Risk assessments are in place to identify priority and support needs.
- 12.1.7. Management oversight will consistently be in place to support officers and quality assure casework.
- 12.1.8. Access to services and referral processes are clear and transparent.
- 12.1.9. Develop a simple procedure for record keeping for all key areas of service – setting the standard for the department and an audit form for team leaders to use to ensure staff are implementing the form (procedure).
- 12.1.10. This policy will be shared with residents and published on the Islington council website.

### **13.0 Related policies and procedures**

- 13.1. This policy/commitment will be embedded across all services and applied to best practice, guides and toolkits. Listed below are examples of policy and procedures:
  - 13.1.1. Safeguarding policies and guidance
  - 13.1.2. Dignity For All Policy
  - 13.1.3. ASB procedure
  - 13.1.4. Disability Facilities Grants Policy
  - 13.1.5. Domestic Abuse Housing Policy
  - 13.1.6. Translation – corporate guidance
  - 13.1.7. Housing Allocations Scheme
  - 13.1.8. Hoarding Procedure
  - 13.1.9. Major Work Transfer Procedure
  - 13.1.10. High Risk Moves Procedure
  - 13.1.11. Good Neighbourhood Management Policy
  - 13.1.12. Repairs Policy
  - 13.1.13. Complaints Policy