

Fair Access and Exit Policy

Originator:	Policy and Strategy Team
Executive Management Team Approval Date:	October 2018
Review date:	October 2021

1	Introduction
1.1	This Policy ensures that all applicants that apply for independent living housing owned and managed by One Vision Housing (OVH) receive a fair / transparent assessment of their needs and associated risks before offers of accommodation are made.
1.2	The Policy also sets out how OVH will provide advice to customers who choose to have the service and signpost them to relevant agencies as required.
1.3	<p>The application of this Policy ensures compliance with the outcomes of the Regulatory Framework for Social Housing in England as outlined below:</p> <ul style="list-style-type: none"> ● Registered providers shall ensure effective governance arrangements that deliver their aims, objectives and intended outcomes for customers and potential customers in an effective, transparent and accountable manner. Governance arrangements shall ensure they: <ul style="list-style-type: none"> ○ Adhere to all relevant legislation ○ Comply with their governing documents and all regulatory requirements ○ Are accountable to customers, the regulator and relevant stakeholders ○ Safeguard taxpayers' interests and the reputation of the sector ○ Have an effective risk management and internal controls assurance Framework ● Registered providers shall: <ul style="list-style-type: none"> ○ Provide choices, information and communication that is appropriate to the diverse needs of their customers in the delivery of all standards ○ Have an approach to complaints that is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly ○ Treat all customers with fairness and respect ○ Demonstrate that they understand the different needs of their customers, including in relation to the seven equality strands and customers with additional support needs

- Meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes
- provide a cost-effective repairs and maintenance service to homes and communal areas that responds to the needs of, and offers choices to, customers, and has the objective of completing repairs and improvements right first time
- Co-operate with relevant partners to help promote social, environmental and economic wellbeing in the areas where they own properties
- Manage their resources effectively to ensure their viability is maintained
- With regard to quality of accommodation, registered providers shall:
 - Ensure that customers' homes meet the standard set out in section five of the Government's Decent Homes Guidance and continue to maintain their homes to at least this standard
 - Ensure that customers' homes meet the standards of design and quality that applied when the home was built, and were required as a condition of publicly funded financial assistance, if these standards are higher than the Decent Homes Standard
 - In agreeing a local offer, ensure that it is set at a level not less than these standards and have regard to section six of the Government's Decent Homes Guidance
- Registered providers shall offer and issue the most secure form of tenure compatible with the purpose of the housing and the sustainability of the community, and an efficient use of their housing stock. They shall meet all applicable statutory and legal requirements in relation to the form and use of tenancy agreements or terms of occupation.
- Registered providers shall let their homes in a fair, transparent and efficient way. They shall take into account the housing needs and aspirations of customers and potential customers. They shall demonstrate how their lettings:
 - make the best use of available housing
 - are compatible with the purpose of the housing
 - contribute to local authorities' strategic housing function and sustainable communities
 - enable their customers to gain access to opportunities to exchange their tenancy with that of another customer, by way of internet-based mutual exchange services

1.4

The Policy meets the following OVH corporate objectives:

- To provide the environment to deliver business success
- To provide homes that meet demand in safe and sustainable neighbourhoods
- To provide excellent services that meet or exceed customers' and stakeholders' expectation
- To make a positive impact in the communities in which we operate

<p>1.5</p> <p>1.5.1</p> <p>1.6</p> <p>1.6.1</p> <p>1.6.2</p> <p>1.6.3</p>	<p>Access and Communication</p> <p>OVH is committed to ensuring that our services are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for us or use our services.</p> <p>Equality, Diversity and Human Rights</p> <p>OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out our duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Transgender, Sexual Orientation, Religion and/or Belief, Civil Partnership and Marriage, Pregnancy and Maternity.</p> <p>OVH also recognise that some people experience disadvantage due to their socio economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.</p> <p>OVH will also ensure that all services and actions are delivered within the context of current Human Rights legislation. Staff and others with whom OVH works, will adhere to the central principles of the Human Rights Act (1998).</p>
<p>2</p> <p>2.1</p> <p>2.2</p> <p>2.3</p> <p>2.4</p>	<p>Statement of Intent</p> <p>OVH will comply with all relevant legislation, regulation and contractual obligations in all areas of work in regard to assessing the needs and associated risk issues of individuals applying for the independent living housing.</p> <p>OVH will take all reasonable and practical steps to protect vulnerable people from being offered or refused tenancies without an assessment of need and associated risk.</p> <p>OVH will maintain confidentiality in all information relating to pre-tenancy needs and risk assessments and will only share information with partner or referring agencies according to:</p> <ul style="list-style-type: none"> • Any joint working or information sharing protocols developed as part of effective assessment and support provision • When information comes to light that indicates the safety of individuals or communities may be at risk • In line with existing OVH information sharing guidance. <p>OVH will respect the rights of individuals to make their own decisions and will factor this approach of empowerment and the creation of independence into decisions on the basis of need and risk assessments. In all situations there will be an assumption of capacity unless circumstances or information indicate otherwise, defined (by the Mental Capacity Act 2005) as being <i>unable to make a decision for him/herself because of an impairment of or a functioning of the mind or brain</i> when professional advice will be sought and an advocate used as appropriate.</p>

2.5	OVH will consider the potential for safeguarding adults' issues to become apparent during assessment and in such cases will use its clearly understood and widely accessible procedures for reporting issues of concern including making referrals in accordance with the relevant Local Authority's Framework for Action.
2.6	OVH will ensure that support is offered so that the exits of those who leave the service will be appropriate, supported, and transparent.
3	Policy
3.1	Fair Access
3.1.1	Any Property Pool Plus (the Sub Regional Choice Based Lettings Allocation Scheme) bid for an independent Living property will only result in a formal offer once a pre-tenancy needs and risk assessment has been carried out and an appropriate level of need and risk identified.
3.1.2	If an applicant is unsuccessful in a bid for any reason, even though he or she may have been assessed as having an appropriate level of need, the assessment will be considered current for six months, subject to any changes in circumstance being notified if a further bid is made for an alternative property within that time period.
3.1.3	After a period of six months a new assessment must be undertaken should any further bids be made.
3.1.4	Any concerns over the issues raised in the assessment will be raised with an Independent Living Team Leader or in their absence the Independent Living Manager prior to a final decision being made.
3.1.5	Refusals will include reasons for refusal and signpost applicants to services that may be able to offer a more appropriate, specialist or intensive service. Copies of letters will also be sent to referring agencies unless the applicant requests that this not be done. The eligibility criteria for the service is clear over what level of service can be provided to ensure needs can be met (in conjunction with other agencies and individuals as appropriate).
3.2	Move On/ Exit
3.2.1	In Retirement housing schemes, it is anticipated that the service will continue for the length of the tenancy. Where customers move on because of changed circumstances or increasing/decreasing need, support will be provided to them to ensure as smooth a move as possible.
3.2.2	Where the level of need becomes so great that people cannot safely remain in their accommodation or where behaviour (such as anti-social behaviour or concerns around health needs) means that individuals are in breach of tenancy, a case conference will take place with all key support agencies and services invited to ensure issues are addressed. Support will be provided to the individual to ensure they are able to understand the implications of their behaviour. Where possible support plans will identify additional support services that may enable the tenancy to be maintained. The capacity of any individual will be considered.

3.2.3	Where a tenancy is ended in such circumstances a review of lessons learned will be undertaken by the Independent Living Manager clearly identifying the steps taken, support provided and any service improvements that need to be made as a result.
3.2.4	An audit of accesses to and exits from the service will be undertaken every quarter to ensure fairness and transparency and promote service improvements.
4	Implementation
4.1	Fair Access
4.1.1	A pre-tenancy assessment document has been implemented and is currently being completed for new customers prior to an offer of accommodation being made to ensure that they meet the criteria for the service.
4.1.2	If the assessment indicates the service would meet the needs of the applicant and risks are manageable the applicant will be informed. If the service is suitable but the property is unsuitable in line with the Property pool Plus allocation criteria then the property will not be offered irrespective of the suitability of the service.
4.1.3	Where an assessment indicates needs are too high to be met by the service this will be advised by the Independent Living Officer undertaking the assessment to the applicant. A letter will go from the Independent Living Team to the applicant confirming the level of need is too high and signposting the applicant to other services that may be more suitable. In these circumstances the applicant will be given the right to appeal the decision, via the OVH Independent Living Appeals process.
4.1.4	If the assessment indicates that support needs and/or risk issues are too high for the level of support offered by the independent living service then consideration must be given, with the Independent Living Team Leaders, or in their absence the Independent Living Manager, to the potential for offering a service if additional support services are put in place with other agencies. Reasons for the decision, either way, will be recorded. If the decision is that with additional support the service can be offered, the letter to the applicant must detail this and a written guarantee from the additional agencies of the support they will provide must be sought prior to the offer being made. This written guarantee will form part of the support plan and a multi-agency approach to support will be taken with reference to (or development of) joint working and information sharing protocols as appropriate.
4.1.5	If the decision remains that the service cannot meet the needs of the applicant then a letter must be sent detailing the reasons. A copy of the letter must go to any referring agencies unless the applicant has requested that this is not done. The letter will make clear that an appeal can be made but that this particular property will not be kept empty pending an appeal.
4.1.6	OVH completes a pre- needs assessment, Safety Plan and Housing Action Plan at assessment stage. This Housing Action Plan will remain in place for the first six months of the service being provided unless customer's need have changed. Thereafter, each Safety Plan and Housing Action Plan will be reviewed every 12 months and the risk assessment and management plan will be updated in line with this review or more frequently if needed. An immediate review will take place if any risk issues occur and the risk management plan will be adapted as necessary.

4.2	Move On/Exit	
4.2.1	Where customers choose through circumstances or increasing or decreasing levels of need to move to alternative accommodation, OVH will provide support for the move and an exit interview will be undertaken. Housing action plan reviews will consider the need for alternative accommodation and service provision as required.	
4.2.2	Where levels of need or behaviour that places the tenancy at risk occur, they will be addressed by an immediate review of the housing action plan. If the customer refuses to engage, a review will take place in their absence and be approved by the Team Leader to ensure fairness and consistency. The review may include a representative of the Neighbourhood Housing and/or Anti- Social Behaviour teams. It is essential that any other support providers including family or carers, where this is appropriate, are given the opportunity to attend and be involved in the review.	
4.2.3	Where it becomes apparent that an independent living customer is in danger of losing their tenancy for any reason (including where additional support is provided by outside agencies) the Independent Living Manager will be advised and liaise with the relevant OVH Managers to ensure support is provided. Advice will be given immediately the tenancy is known to be at risk about independent advocacy. The housing action plan will clearly record any advice and support given to access external services.	
4.2.4	Following the loss of a tenancy in this way the Independent Living Manager will review learning outcomes and service improvements opportunities.	
5	Performance	
5.1	Good performance will reduce likelihood of turnover of properties and ASB resulting from unmanaged support needs. The Policy does not contribute directly to any established performance measures.	
6	Consultation	
6.1	All staff have been consulted about the development of this Policy.	
6.2	The Tenancy Policy Review Group was also consulted in developing this Policy on 09/10/2018.	
7	Review	
7.1	The Policy and all supporting procedures will be reviewed every three years (from the date of approval). The review process will ensure continuing suitability, adequacy and effectiveness of the Policy and may be prompted by the introduction of new legislation or regulation or in the light of findings from the continual risk assessments of service users' circumstances.	
8		
8.1	Was a full Equality Impact Assessment (EIA) required?	Yes
8.2	When was EIA conducted and by who?	Independent Living Manager & Strategy and Policy Manager in 2015

8.3	Results of EIA	<ul style="list-style-type: none"> • Policy to be shared with appropriate agencies. • External agencies to review impact of Policy and provide feedback. • Training sessions on fair access and other new/revised policies to be provided to OVH staff • Ensure maximisation of income and service outcomes. Monitor and audit access and exits to identify need for change. Highlight levels of need and inform strategic partners. 	
9			
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	Executive Management Team	
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Operation Director –Support Services	
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Operation Director –Support Services	
10			
Amendment Log			
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
13 October 2015	In Line with Review Schedule	See section 6 above	<ul style="list-style-type: none"> • Change of job titles throughout from ‘Supported Housing Officers’ to ‘Independent Living Officers’ to reflect staff restructure • Housing action plans (formerly known as ‘support plans’) will be reviewed every 12 months as opposed to 6 months • The corporate objectives have been updated to reflect the new OVH Corporate Strategy

			<ul style="list-style-type: none"> Review schedule increased from annually to every three yearly
16 October 2018	In Line with Review Schedule	See section 6 above	<ul style="list-style-type: none"> Change at 4.1.6: the section has been reworded for clarity The Policy has been divided into two sections i.e. 'Fair Access' and 'Move On/Exit' The whole Policy has been amended in line with current OVH business practices