

# Agenda

## Cabinet

Date: **Thursday 12 April 2018**

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Time: **2.00 pm**

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Place: **The Council Chamber - The Shire Hall, St. Peter's Square, Hereford, HR1 2HX**

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Notes: Please note the time, date and venue of the meeting.

For any further information please contact:

**Sarah Smith**

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If you would like help to understand this document, or would like it in another format, please call Sarah Smith on (01432) 260176 or e-mail [sarah.smith1@herefordshire.gov.uk](mailto:sarah.smith1@herefordshire.gov.uk) in advance of the meeting.

# Agenda for the meeting of Cabinet

## Membership

**Chairman**

**Councillor JG Lester**

**Vice-Chairman**

**Councillor NE Shaw**

**Councillor H Bramer**

**Councillor BA Durkin**

**Councillor DG Harlow**

**Councillor PD Price**

**Councillor P Rone**

**Councillor EJ Swinglehurst**

## Agenda

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| 1.  | <p><b>APOLOGIES FOR ABSENCE</b></p> <p>To receive any apologies for absence.</p>  |           |
| 2.  | <p><b>DECLARATIONS OF INTEREST</b></p> <p>To receive any declarations of interest by Members in respect of items on the Agenda.</p>   |           |
| 3.  | <p><b>MINUTES</b></p> <p>To approve and sign the minutes of the meeting held on 15 March 2018.</p>  | 11 - 14   |
| 4.  | <p><b>QUESTIONS FROM MEMBERS OF THE PUBLIC</b></p> <p>To receive questions from members of the public.<br/> <i>Deadline for receipt of questions is 5:00pm on Monday 9 April 2018.<br/>           Accepted questions will be published as a supplement prior to the meeting.<br/>           Please see <a href="https://www.herefordshire.gov.uk/getinvolved">https://www.herefordshire.gov.uk/getinvolved</a> for information on how to submit a question.</i></p> |           |
| 5.  | <p><b>QUESTIONS FROM COUNCILLORS</b></p> <p>To receive questions from councillors.<br/> <i>Deadline for receipt of questions is 5:00pm on Monday 9 April 2018.<br/>           Accepted questions will be published as a supplement prior to the meeting.</i></p>  |           |
| 6.  | <p><b>HEREFORDSHIRE SAFEGUARDING ADULTS BOARD ANNUAL REPORT 2016/17</b></p> <p>To receive a presentation from the chairman of the Herefordshire Safeguarding Adults Board (HSAB) on the work of the board in 2016/17.</p>   | 15 - 56   |
| 7.  | <p><b>HEREFORDSHIRE SAFEGUARDING CHILDREN BOARD (HSCB) ANNUAL REPORT 2016/17</b></p> <p>To receive a presentation from the chairman of the Herefordshire Safeguarding Children Board (HSCB) on the work of the board in 2016/17.</p>  | 57 - 134  |
| 8.  | <p><b>CORPORATE DELIVERY PLAN 2018/19</b></p> <p>To agree the activities within the corporate delivery plan 2018/19.</p>  | 135 - 144 |
| 9.  | <p><b>CONSTRUCTION AND FACILITIES MANAGEMENT SERVICES TO HEREFORDSHIRE COUNCIL</b></p> <p>The amalgamation of the council building maintenance and cleansing services contract, to be procured through an open market tender exercise.</p>  | 145 - 152 |
| 10. | <p><b>PROPOSED REDESIGN OF THE ALLOCATIONS ARRANGEMENTS FOR HEREFORDSHIRE</b></p> <p>To approve the proposed redesign of the allocations arrangements for Herefordshire.</p>  | 153 - 170 |
| 11. | <p><b>REVISION OF THE ALLOCATIONS POLICY FOR HEREFORDSHIRE</b></p> <p>To approve the revised Allocations Policy for Herefordshire.</p>  | 171 - 246 |



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- Inspect agenda and public reports at least five clear days before the date of the meeting.
- Inspect minutes of the Council and all Committees and Sub-Committees and written statements of decisions taken by the Cabinet or individual Cabinet Members for up to six years following a meeting.
- Inspect background papers used in the preparation of public reports for a period of up to four years from the date of the meeting. (A list of the background papers to a report is given at the end of each report). A background paper is a document on which the officer has relied in writing the report and which otherwise is not available to the public.
- Access to a public register stating the names, addresses and wards of all Councillors with details of the membership of Cabinet and of all Committees and Sub-Committees.
- Have a reasonable number of copies of agenda and reports (relating to items to be considered in public) made available to the public attending meetings of the Council, Cabinet, Committees and Sub-Committees.
- Have access to a list specifying those powers on which the Council have delegated decision making to their officers identifying the officers concerned by title.
- Copy any of the documents mentioned above to which you have a right of access, subject to a reasonable charge (20p per sheet subject to a maximum of £5.00 per agenda plus a nominal fee of £1.50 for postage).
- Access to this summary of your rights as members of the public to attend meetings of the Council, Cabinet, Committees and Sub-Committees and to inspect and copy documents.

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- The Shire Hall is a few minutes walking distance from both bus stations located in the town centre of Hereford.

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Please do not allow any items of clothing, etc. to obstruct any of the exits.

Do not delay your vacation of the building by stopping or returning to collect coats or other personal belongings.

The Chairman or an attendee at the meeting must take the signing in sheet so it can be checked when everyone is at the assembly point.

## Guide to Cabinet

The Executive or Cabinet of the Herefordshire Council consists of a Leader and Deputy Leader and six other Cabinet Members each with their own individual programme area responsibilities. The current Cabinet membership is:

|   |                                       |
|---|---------------------------------------|
| Councillor JG Lester (Leader) (Conservative)      | Corporate Strategy and Budget         |
| Councillor NE Shaw (Deputy Leader) (Conservative) | Finance and Corporate Services        |
| Councillor H Bramer (Conservative)                | Contracts and Assets                  |
| Councillor BA Durkin (Conservative)               | Transport and Regulatory Services     |
| Councillor DG Harlow (Conservative)               | Economy and Communications            |
| Councillor PD Price (Conservative)                | Infrastructure                        |
| Councillor P Rone (Conservative)                  | Health and Wellbeing                  |
| Councillor E Swinglehurst (Conservative)          | Young People and Children's Wellbeing |

The Cabinet's roles are:

- To consider the overall management and direction of the Council. Directed by the Leader of the Council, it will work with senior managers to ensure the policies of Herefordshire are clear and carried through effectively;
- To propose to Council a strategic policy framework and individual strategic policies;
- To identify priorities and recommend them to Council;
- To propose to Council the Council's budget and levels of Council Tax;
- To give guidance in relation to: policy co-ordination; implementation of policy; management of the Council; senior employees in relation to day to day implementation issues;
- To receive reports from Cabinet Members on significant matters requiring consideration and proposals for new or amended policies and initiatives;
- To consider and determine policy issues within the policy framework covering more than one programme area and issues relating to the implementation of the outcomes of monitoring reviews.

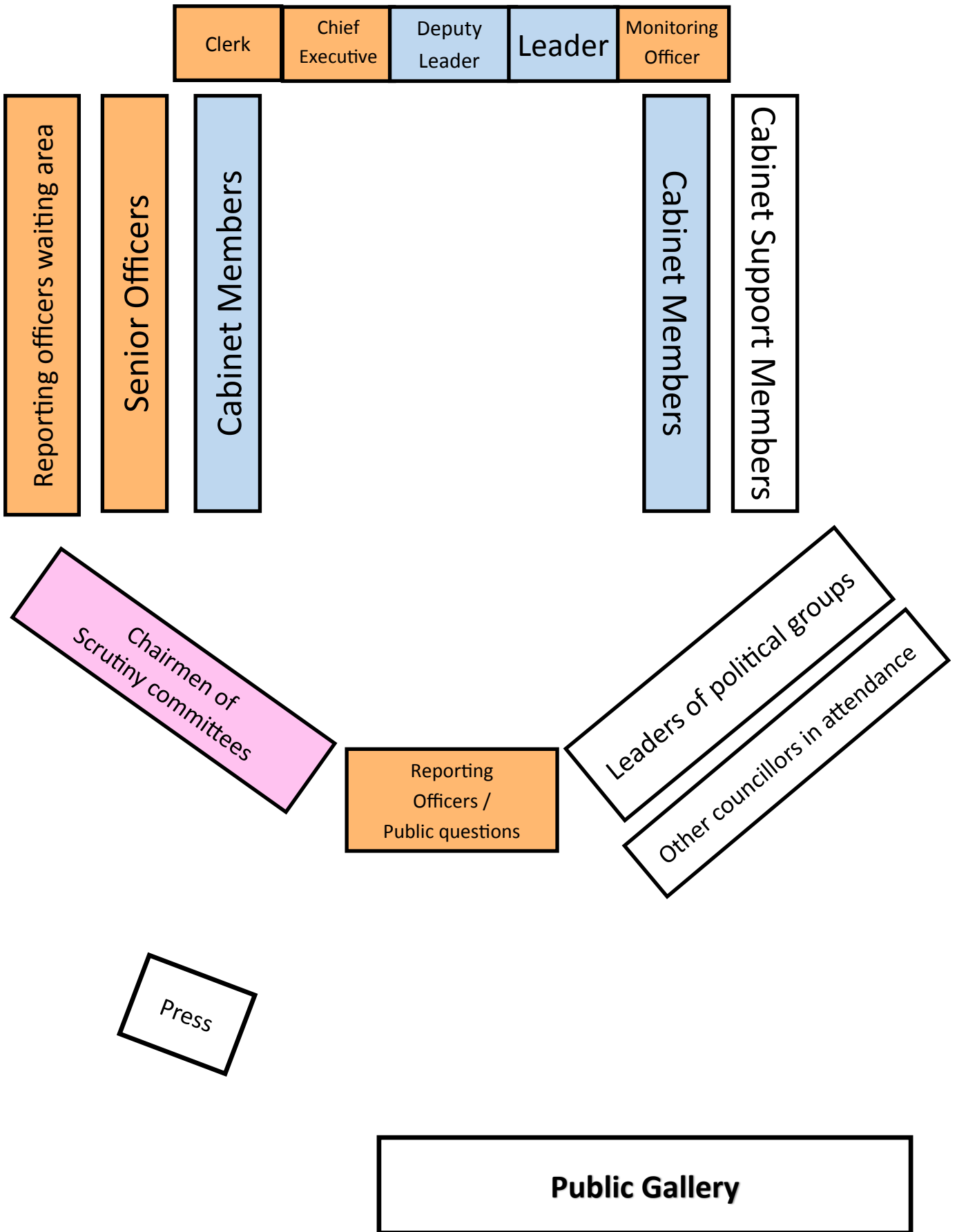
### Who attends cabinet meetings?

On the next page you will find a layout plan of the room showing who is sitting where. Coloured nameplates are used which correspond to the colours on the plan as follows:

|           |  |
|-----------|--|
| Pale blue | Members of the cabinet, including the leader of the council and deputy leader – these are the decision makers, only members of the cabinet can vote on recommendations put to the meeting. |
| Orange    | Officers of the council – attend to present reports and give technical advice to cabinet members   |
| Pink      | Chairmen of scrutiny committees – attend to present the views of their committee if it has considered the item under discussion  |
| White     | Political group leaders – attend to present the views of their political group on the item under discussion  |
|           | Other councillors may also attend as observers but are not entitled to take part in the discussion.  |









Herefordshire Council

**Minutes of the meeting of Cabinet held at Council Chamber, The Shire Hall, St Peter's Square, Hereford, HR1 2HX on Thursday 15 March 2018 at 2.00 pm**

**Present:** Councillor JG Lester (Chairman)  
 Councillor NE Shaw (Vice-Chairman)

Councillors H Bramer, BA Durkin, DG Harlow, PD Price, P Rone and EJ Swinglehurst

Cabinet support members in attendance Councillors JA Hyde, JF Johnson and RJ Phillips

Group leaders in attendance Councillors JM Bartlett, TM James, RI Matthews and AJW Powers

Scrutiny chairmen in attendance Councillors WLS Bowen and CA Gandy

Other councillors in attendance: Councillors J Hardwick and D Summers

Officers in attendance: Alistair Neill, Geoff Hughes, Chris Baird, Claire Ward, Andrew Lovegrove and Stephen Vickers

**100. APOLOGIES FOR ABSENCE**

There were no apologies from members of the cabinet.

**101. DECLARATIONS OF INTEREST**

None.

**102. MINUTES**

**Resolved:** That the minutes of the meeting held on 15 February 2018 be approved as a correct record and signed by the Chairman.

**103. QUESTIONS FROM MEMBERS OF THE PUBLIC**

No questions were received from members of the public.

**104. QUESTIONS FROM COUNCILLORS**

No questions were received from councillors.

## 105. PROVISION OF YOUNG CARERS SERVICE

The cabinet member for health and wellbeing introduced the report. He noted that the proposed service would support a vulnerable group upon whom other vulnerable people depended for care and that it would be complementary to the services already provided by Herefordshire Carers Support (HCS).

Officers explained that the council's duties in respect of young carers were set out in a number of different pieces of legislation. The scope of services provided by HCS was not sufficient to enable the council to be confident that it was discharging all its statutory duties in full. In particular, it was necessary to take further steps to ensure that assessments of young carers were holistic and considered all aspects of the young person's life, beyond just their caring role and the wider family situation.

It was recognised that the existing support provided by HCS was valued by both carers and the council. The proposed new service would ensure that statutory duties were met, would follow the early help model of assessment and would connect to other support services in diverse and flexible ways.

The option to outsource the service was not recommended as the contract would be of low financial value and the working environment would be complex. The proposal was therefore to establish an in-house service, building on existing connections and partnerships with other support services. The service would be regularly reviewed to monitor achievement of objectives and subject to a significant review towards the end of 2020.

In discussion of the item it was noted that:

- assessments of young carers' needs would draw on whichever sources were relevant to each individual and would make use of existing connections e.g. schools and GPs;
- the specification for the new service had been prepared in conjunction with those who would manage the objectives using an outcomes based approach;
- performance monitoring of the new service would be based on the accumulation of data, with periodical sampling of those young carers who had received support;
- HCS had a contract with the council but this did not include provision of services for young carers, such services as HCS provided were at the organisation's own initiative and funded through external grants;
- regular contact with HCS would continue to make sure information was shared as appropriate and services were complementary, wider strategic work was also taking place with all agencies that might come into contact with young carers;
- the in-house service would draw on the existing connections to partner agencies, it was hoped that making use of these established networks would help to identify young carers who might not otherwise come forward;
- identification of carers of all types was a challenge and a key focus for the Carers Strategy Action Group.

Group leaders were invited to present the views of their group. There was broad support for the proposals but some concerns were raised. Further clarification was provided that:

- the service would operate county wide, partnerships with GPs and schools being particularly important in rural areas;
- national research showed that being a young carer could have a significant impact on long term life chances, the proposed service would seek to mitigate this impact;

- officers were confident that the proposed budget for the new service of £65k was sufficient and the budget had been calculated on the basis of a need for at least 2 full time support workers;
- had the existing family support services not been available to draw on the costs of establishing the new service could have been higher;
- the potential for overlap with services provided by HCS and others was acknowledged but considerable care was being taken to avoid this and there would be ongoing discussion to ensure services complimented each other;
- it was intended that the children and young people scrutiny committee would review the performance and progress of the new service later in the year.

**Resolved that:**

**That:**

- (a) the development and delivery of an in-house service to support young carers is approved; and**
- (b) authority is delegated to the director for adults and wellbeing, in consultation with the director for children's wellbeing, to approve the final service delivery model and its implementation from 1 April 2018, with a maximum service value of £65k per annum.**

The meeting ended at 2.38 pm

**Chairman**





Herefordshire  
**Safe guarding**  
Adults board



# Annual Report

2016-2017

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# Foreword

Welcome to Herefordshire's Safeguarding Adults Board Annual Report 2016-2017. The report provides the Board members with the opportunity to reflect and report on how they have delivered progress against the Board's strategic priorities for this year.

In last year's annual report we outlined how the peer challenge of the local council and the Board had resulted in identifying both areas of strength and areas where more work was required. Earlier this year we were revisited by the peer challenge team for them to hear how we have progressed the relevant areas of our action plan. Their feedback was very positive and the progress we've continued to deliver, demonstrates the commitment and professionalism of the Board members.

We have strengthened the content of our three year strategic plan and annual business plans to better enable the Board to understand what progress we are making, and where we need to provide additional scrutiny and challenge.

The main focus of our work is to support individuals who are at risk of harm and abuse, and to empower them to resolve the position they are in, but in a manner which is both proportionate and enables them to be more in control of their lives. This is reflected in the Making Safeguarding Personal (MSP) guidance. Helpfully during this year there has been both a national review, known as the 'MSP temperature check' and a local council co-ordinated partnership review of MSP across Herefordshire.

These two reviews formed the basis of our Board MSP action plan and were the subject of a Board development event during which agencies committed to deliver against their own particular aspects of it. Whilst this is a strong foundation from which to move forward, the Board is not complacent as to the size and complexity of the challenge, and MSP remains an area of sharp focus for the Board. In particular, different agencies are at differing levels of understanding and maturity with regard to MSP, and the challenge for the Board is to secure consistent application of MSP across the partnership.

Linked to this is the ongoing commitment to secure and learn from the experience of those who unfortunately have to seek the support of the safeguarding system. Board meetings always commence with members hearing a 'lived experience' to ensure our discussions and decision making are grounded by the day to day experience of frontline professionals and the people we serve and support.

Placing the person at the centre of the safeguarding process requires professionalism, commitment and skill from our frontline staff and leadership and support from senior and strategic managers. The Board is key to providing both challenge and seeking assurance that these dynamics work effectively.

The Board and its members are learning how complex adult safeguarding can be within specific settings and circumstances. By way of example, we are currently working jointly across Herefordshire and Shropshire with adult social care and police professionals to explore where we may need to develop and provide more flexible service responses to those who are experiencing domestic abuse.

Member agencies continue to develop their own practice but also take account of how they can impact positively across the partnership. The appointment by Wye Valley NHS Trust of a designated Mental Capacity Act lead staff member is of course important to that organisation, but additionally this has brought significant benefit to the Mental Capacity Act and Deprivation of Liberty Safeguards work of the Board. Likewise, Hereford & Worcester Fire and Rescue Service has developed its fire home safety checks to include broader discussions with potentially vulnerable individuals on a range of health and wellbeing aspects. This is a very welcome development in support of the Board's prevention work, and again is reflective of the 'coming together' of the Board members.

There is still more to do, but also much to recognise as success. I trust you will find this report open, interesting and informative, and where possible I would ask that you use it to raise the profile of the work of Herefordshire's Safeguarding Adults Board, and more importantly the profile of adult safeguarding across Herefordshire.

I am confident of the continued commitment of the Board to drive improvement forwards, and my thanks to all of you who work tirelessly to support and protect some of the most vulnerable residents in Herefordshire.



**Ivan Powell**  
Chair of Herefordshire's Safeguarding Adults Board

# Strategic priorities

The strategic priorities for 2016/17 were identified during a development meeting in November 2015. These were devolved to the relevant sub groups to produce work plans to deliver the activity against them.

## The Board priorities for the year 2016/17 were:

1. Partnership working
2. Prevention and protection
3. Communications and engagement
4. Operational effectiveness

The priorities are underpinned by a set of ambitions which are detailed as bullet points in the following section. Information reporting on progress made in these areas is included, together with a number of case studies which shows how this work is making a difference to people's lives.

## Priority 1 - Partnership working

- **All partners have a shared understanding of safeguarding**

A recent development has been the creation of a cross agency chairs meeting which has members from Herefordshire Council, West Mercia Police, Herefordshire Clinical Commissioning Group, Public Health, Community Safety Partnership, Independent Chair of both Adults and Children's Safeguarding Boards and Cabinet Members for both Adults and Children's Wellbeing.

The purpose of this meeting is to identify cross cutting themes and to ensure they are progressed efficiently within the partnership, avoiding duplication of effort.

- **Increased involvement from the voluntary sector**

We will increase the role and involvement of the voluntary sector regarding safeguarding.



# The role of the Voluntary Community Sector (VCS) regarding safeguarding

There is an increasing expectation for 'the community' to look out and care for its own and an increasing need for communities and families to be more involved in the support and delivery of care. The Board fully recognises that within this there is potential for safeguarding risk.

In certain situations it may be inappropriate or unwelcome for a neighbour to provide care. In such circumstances, either through ignorance or malice, this could risk harm to the individual, present a risk to their dignity or result in a restriction of their choice, control and liberty. People may not have the personal resilience or understanding to challenge the action of another, to seek help or advice, or indeed raise a safeguarding concern. This is made more acute where they perceive there is no alternative to the support. Advocacy would not be sought where no risk is perceived or understood. The risk is also compounded where the most vulnerable people are isolated and do not have access to support and the right advice and information, often because they are not known to services and may be particularly hard to reach.

Herefordshire's voluntary sector is strong and vibrant and consists of organisations, large and small, engaged in a wide and diverse range of activity, in particular connecting people across the county. Its formal and informal support networks, including those facilitated by Herefordshire Voluntary Organisations Support Service (hvoss), provides opportunities to reach and engage vulnerable, isolated and sometimes difficult to reach people.

The community includes all of us who live in it, volunteers, carers (usually but not always family members, who are unpaid), support workers (paid staff), and others such as shop assistants and postal workers, all of whom play a crucial 'watchdog' role, identifying risks and raising concerns within the community.

However, something may not be recognised as a risk or as actual abuse, where they may see a change in an individual or their routine that 'niggles'. The key is to empower people to feel confident about where and how to raise a concern, and in doing so, overcome any reluctance to get involved or respond to an issue formally. The voluntary sector is a key group of organisations and individuals who greatly assist in supporting the Board's priority to improve the awareness of adult safeguarding across Herefordshire.

They are also crucial to noticing where abuse may be taking place and in supporting people to raise concerns themselves.

One of the significant challenges is the need to balance the perception of risk with a need to respect and support individuals to live in circumstances which may, in themselves, appear to be risky. The voluntary sector work hard to establish a shared understanding of risk, what constitutes safeguarding and how to identify and deal with a safeguarding matter. This is done through ongoing dialogue, engagement, training and collaborative working with the voluntary sector.

The voluntary sector has been key to raising awareness and understanding of the perception of risk and living safely on a day to day basis by providing both formal 'lived experience' studies through to anecdotal information to the Board.

Resolution of a formal safeguarding concern may not be the end of any risk or abuse in a person's life. The person may still live in the same environment and face similar risks day to day, either through their choice or circumstances. Ensuring everyone remains connected to their community in some way helps to identify, manage and respond to safeguarding risk and ensure communities and individuals living in them, including those who are most vulnerable, are safe and resilient.

**Karen Hall**

Aspire Chief Executive (on behalf of hvoss)

- **Active participation from all partners**

At a national level Trading Standards gather intelligence on lists of people used by unscrupulous traders and fraudsters to target those who are vulnerable to activity known as “scams”. Locally, Herefordshire Council’s Trading Standards work to reduce the vulnerability of those suspected of having been a potential scam victim.



## Case study - How partnership working has helped a resident in Herefordshire

**Mrs P was identified by this national process. In the first instance, an officer from Herefordshire Council’s Trading Standards visited Mrs P’s home to provide advice and determine whether or not she was a scam victim. Mrs P is a widow in her mid-80’s who lives alone in rural Herefordshire and suffers from a cognitive impairment, which affects her memory.**

Initially Mrs P said she hadn’t been approached by anyone trying to sell her goods or services, but she did receive a small amount of unsolicited mail in the form of foreign lotteries, which she was able to identify as being a scam and said she simply put them in her recycling bin. During the home visit, the officer noticed a newly installed home security system and asked questions relating to it. Mrs

P couldn’t provide much detail, but gave the officer her son’s phone number, as he was the best person to contact to discuss the matter.

Following contact with her son, it became clear that Mrs P was constantly being targeted by rogue traders and had recently signed a contract for nearly £4,000 for the installation of the home security system, which she didn’t need as she already had a fully functioning system in place. The salesperson knew her current system was working and even visited her property and removed her existing alarm system in order to secure the sale.

Further investigation revealed that days after the first salesperson had coerced Mrs P into signing a contract, another completely different home security company had sent their own salesperson to her property to sell her another system. They removed the system which had only been fitted days before to secure the sale and convinced Mrs P to sign another contract for £3,000.

In only three weeks, Mrs P had been sold two home security systems she didn’t need for almost £7,000 and within the previous six months, she had signed up to four worthless call blocking systems over the phone, costing her over £300.

Intervention from the council’s Trading Standards and joint working with Mrs P’s sons meant that almost £7,000 was recovered from the home security companies. Trading Standards represented Mrs P and also provided her with a free fully functioning call blocking system, which can be monitored remotely by her sons who don’t live locally.

To date there has been no further issues due to the collaborative work between Trading Standards, Mrs P and her family.

**If you think you know a scam victim, please contact Herefordshire Council’s Trading Standards on 01432 261761**

**Herefordshire Council Trading Standards Officer**

## Case study - Multi-agency safeguarding in the community

**West Mercia Police was working with Mrs X, who has health and care issues, which were compounded further by the anti-social behaviour issues she was reporting. Despite the best efforts of the police, they had been unable to secure sufficient evidence to pursue formal proceedings in respect of the reported behaviour. Mrs X described feeling terrorised and that the situation was extremely detrimental to her wellbeing.**

This position was reviewed by both a supervising officer and senior manager and as a consequence, further measures were put in place to tackle the anti-social behaviour, but more importantly the police recognised there was a need for a more holistic approach to her daily living. As a consequence, they took a much broader review, however this was complicated due to Mrs X's

reluctance to engage with agencies.

The police put in place a bespoke plan to manage the risks with Mrs X's involvement, including visible assurance from members of her local policing team, whilst also addressing concerns regarding asbestos piping and exploring the provision of sound proofing to her home.

During the time the management plan was in place, police officers came to understand that Mrs X's daughter, Miss A, lived in an upstairs room of the home, and by choice lived a very isolated lifestyle. It transpired that Miss A had her own needs but had in fact not been seen by any agency for an extended period of time.

The police enquired after Miss A, but Mrs X was reluctant to allow them to talk to her as she was electively mute and moreover was genuinely concerned that seeing police officers would be further detrimental to her daughter's already fragile circumstances. A significant challenge for the police was a professional need to see Miss A to confirm she was in fact safe and well.

The police met with safeguarding practitioners from the council and agreed a joint approach to engage with Mrs X with a view to securing her support for engagement with her daughter. Ultimately, after a period of time, a plain clothes police officer and an adult social worker met with Miss A and her mother. Miss A did not wish to speak with them, but communication was established in a manner that best suited her needs and professionals were able to establish that she was safe and well.

In conclusion to this case, Mrs X continues to engage with and be supported by services and the anti-social behaviour has stopped. During the last visit by the local policing team, Mrs X said that "it has been absolutely silent and there is peace and quiet". She reported that it was the "first time they had been able to relax since living there and Miss A was a lot more relaxed".

**Dean Jones**  
**Chief Inspector, West Mercia**  
**Police**

Individual agency responses to the work of safeguarding and their role within it can be found in Appendix 3. The following case studies provide real examples of how a multi-agency approach is making positive changes to peoples lives.

- **Multi-agency focus**

The table below also shows strong multi-agency commitment at the Board. Case studies are presented at every meeting, leading to discussion and debate about agencies and their roles in safeguarding both individually and collectively. Professionals are encouraged to consider the work of other organisations and invitations are issued to additional agencies or individuals to aid this and to improve knowledge and understanding.

The Care Act places a responsibility on the Independent Chair to challenge agencies which are not contributing as effectively as they should to the work of the Board. On the Chair's behalf, the Business Unit formally monitors attendance at Board meetings and when holding members to account, the Chair does not focus solely on meeting attendance, but takes a broader view of the members and their agencies contribution to the adults safeguarding agenda.

| Agency   | 09/06/16 | 22/09/16 | 08/11/16 | 05/12/16 | 27/03/17 | Total out of 5 |
|--|----------|----------|----------|----------|----------|----------------|
| HSAB Independent Chair                                   | ✓        | ✓        | ✓        | ✓        | ✓        | 5              |
| HSAB Business Unit Manager                               | ✓        | ✓        | ✓        | ✓        | ✓        | 5              |
| HSAB Business Unit Officer                               | ✓        | ✓        | ✓        | ✓        | ✓        | 5              |
| Herefordshire Council's Adults and Wellbeing Directorate | ✓        | ✓        | ✓        | ✓        | ✓        | 5              |
| Herefordshire Housing                                    | ✓        | AWA      | AWA      | ✓        | ✓        | 3              |
| 2gether NHS Foundation Trust                             | ✓        | ✓        | ✓        | ✓        | ✓        | 5              |
| Herefordshire Clinical Commissioning Group               | ✓        | ✓        | ✓        | ✓        | ✓        | 5              |
| West Mercia Police                                       | ✓        | ✓        | ✓        | ✓        | ✓        | 5              |
| Community Rehabilitation Company                         | ✓        | DNR      | AWA      | AWA      | AWA      | 1              |
| Herefordshire Carers Support                             | DNR      | ✓        | ✓        | AWA      | ✓        | 3              |
| Healthwatch  | ✓        | ✓        | ✓        | ✓        | ✓        | 5              |
| Public Health  | ✓        | AWA      | ✓        | ✓        | ✓        | 4              |
| National Probation Service                               | ✓        | AWA      |          | AWA      | ✓        | 3              |
| Aspire (representing the Voluntary Sector)               | AWA      | ✓        | AWA      | AWA      | AWA      | 1              |
| Wye Valley NHS Trust                                     | ✓        | ✓        | ✓        | ✓        | ✓        | 5              |
| Herefordshire Council                                    | ✓        | AWA      | AWA      | ✓        | DNR      | 2              |
| The Royal National College for the Blind                 | ✓        | DNR      | AWA      | ✓        | X        | 2              |
| Hereford & Worcester Fire and Rescue Service             | X        | ✓        | X        | ✓        | X        | 2              |
| Trading Standards  | X        | X        |          | X        | ✓        | 1              |

**KEY: AWA - absent with apologies • DNR - did not reply to invitation • X - No invitation issued**

- **Sharing the right data**

A key element to effective performance management is the Boards ability to collect the right multi-agency data. The local council and health partners provide timely and accurate information, however some agencies, notably the police as one of the principle partners, are still unable to provide the right information to inform Board discussion and decision making. This is a position which is reflected nationally and the Independent Chair is working with the national Police Lead on Adult Safeguarding to secure progress.

# Priority 2 - Prevention and protection

- **Service user involvement**

It is important that we gather the views of those who have been through the safeguarding process, however, our ability to do so has continued to be a challenge for the Board.

We have separately tried over the year to arrange a service user group and drop in session for individuals and their families who have been safeguarded. Unfortunately, neither of these was successful and we have now engaged with Healthwatch, who are one of the Boards' statutory partners, to undertake this piece of work on our behalf. We are optimistic in this approach as the public already engage with Healthwatch.

We will include in next year's annual report how successful this has been.

- **Good mental health**

The Board recognises the importance of helping people maintain 'good mental health' and as such the principle is embedded into all of our work and discussions.

- **Greater focus on prevention**

During the past year, we have been developing our Prevention Strategy, which supports the development of initiatives to improve prevention, identification and response to abuse and neglect. It draws together work from partner agencies and includes a range of activities aimed at promoting general wellbeing and maintaining independence as a means of reducing vulnerability to exploitation, abuse or neglect.

Included in this is a work plan which will be monitored throughout the year by the task and finish group, set up to deliver this piece of work.

Next year's annual report will include the successful programmes that have been put in place to help deliver this strategy.

The Board has also been working closely with Hereford & Worcester Fire and Rescue Service to develop an improved home safety check initiative that will see fire service staff asking individuals questions about health and wellbeing as well as fire safety during home visits. This will lead to them being signposted to additional support and services that will help them maintain their independence and live more safely.

## Case study - Showing understanding of mental health

**Mr C is in his 40's and has long-standing mental health difficulties. He engages in therapeutic day activities provided by a Voluntary and Community Sector organisation in Herefordshire and his routine attendance provides opportunities to monitor and support his wellbeing.**

Mr C's mother informed the day activities provider that she was very worried that he was at risk of abuse, including financial abuse, from people who were staying at his flat and dealing drugs. She felt he was extremely vulnerable.

Mr C did not attend the day activity for two weeks and his mother advised that he'd suffered an 'unexplained' broken ankle and she was unable to contact him. She spoke to the provider's occupational therapist, who contacted the county safeguarding team to raise a concern. She was also advised to contact the police.

The police attended Mr C's flat and he was admitted to hospital for treatment to his broken ankle. Following discharge from hospital, the safeguarding concern was closed.

Mr C returned to the day activity but failed to attend follow-up treatment appointments for his ankle injury. His mother believes he is still at risk of abuse and the concern is that if she passes away, she's in her 80's and the only close family member, Mr C might disengage from services and become isolated from support, leaving him even more vulnerable.

Mr C is making his own choices about his life but his mother doesn't believe he recognises his own vulnerability, although it is not clear whether this is the case or if Mr C is aware and accepts the risks.

He enjoys the therapeutic day activity and may well recognise that it also maintains a link with a consistent support network, as well as access to services if required.

Staff will maintain a 'watching brief' to encourage and support him to continue to engage with services and ensure concerns are raised with the relevant agencies when necessary.

**Karen Hall**  
**Aspire Chief Executive (on behalf of the Voluntary and Community Sector)**

## Case study - Prevention of harm

Earlier this year, crews from Hereford Fire Station attended an incident in a home where a boiler was found to be leaking carbon monoxide, meaning it needed to be isolated. A lady and her 15 year old son were living in the property, which had no other source of heating, and was unable to replace the boiler.

The Crew Commander contacted the fire service's Signposting Co-ordinator whilst still at the property, as they were incredibly concerned that the home was extremely cold and the occupants had no alternative heating or accommodation. A Home Fire Safety Technician made contact with the family and delivered an oil filled heater to the property that night, with an additional heater being provided the following day.

With consent from the occupant, a referral was made to the Marches Energy Agency to see if they would be eligible for funding for a new boiler. Following the referral, a new boiler was installed, which was fully funded by Marches Energy Agency.

The occupant later commented 'I'm so happy. The attitude of all the people I've dealt with was great, people really trying to help and do positive things. The fire service was great. One chap said he had been thinking of us in the cold weather, it's lovely to hear that'.

**Hereford & Worcester Fire and Rescue Service Technician**

## Priority 3 - Communications and engagement

### • Raising awareness of safeguarding

During the year, we attended the Engaging Communities event in Hereford, which was hosted by Primecare. We spoke to members of the public about safeguarding, mental capacity and deprivation of liberty.

We also met the Mayor!

Our local councillors are a key group, as they help raise awareness of safeguarding across our communities.



A poster for the 'Engaging Communities' event. The poster features a large circular graphic with the text 'Engaging Communities', 'Hereford City Centre', and 'Tuesday 26.07.16'. Below the graphic, it says 'A day of fun activities, information and advice for all the family about your health and wellbeing'. It lists various activities: 'Free blood pressure &amp; diabetes checks / healthy lifestyle tips / health &amp; care advice / meet the emergency services / free police serial registration for your bike / try green woodwork / kids keep fit class / meet a guide dog / Zumba / massage / a museum on the move / arts &amp; crafts / games to try and lots more!'. At the bottom, there is a collage of photos showing people at the event, including a green mascot character. Below the collage is a list of sponsors: healthwatch Herefordshire, POLICE halo, RNC, age UK, GARD GODS, MACMILLAN CANCER SUPPORT, HUBER, Aspirer, SHYPO, and Cargill. It also mentions 'Kindly sponsored by primecare'.



- **Targeting smaller / community organisations**

During the year, we contacted parish magazines and asked if they could include the below article within their publication. Whilst we couldn't insist that it was included, we have had confirmation from most of them that it was.

We have also made links into the Rural Hub Network, which provide support and information to the local farming community.

## Herefordshire Safeguarding Boards

Everyone has a responsibility for safeguarding children, young people and adults at risk of harm. We can help you make sure you know what to do if you think that is happening.

It might be difficult to accept, but anyone can be hurt, put at risk of harm or abused, regardless of their age, gender, religion or ethnicity by either someone they know or a stranger.



If you are concerned about an adult ring **01432 260715** (weekdays 9-5)  
OR **0330 123 9309** (at any other time)



If you are concerned about a child ring **01432 260800**

If someone is injured or in immediate danger dial 999

If there is no emergency but you think a crime may have been committed ring West Mercia Police on 0300 333 3000 or 101

Abuse of any description is wrong and by reporting it you can help to bring it to an end

If, as a member of the public or an organisation, you want more information about the work that the Safeguarding Boards do to keep children and adults that live and work in Herefordshire safe than please contact us on **01432 260100**

- **Raising awareness of Mental Capacity Act and Deprivation of Liberty Safeguards**

In conjunction with the Herefordshire Clinical Commissioning Group (CCG), we have developed bookmarks for professionals that include a quick guide to both the Mental Capacity Act and Deprivation of Liberty Safeguards.

## Case study - Best interest health decision

Mr H is 76 years old and has been seen in the hospital's outpatients department due to concerns about abnormal symptoms, which could be suggestive of cancer. A relative accompanied Mr H, as he has Alzheimer's and struggles with his short term memory and ability to focus on any particular topic.

The Doctor initially presumed Mr H had the capacity to make decisions about his own care and treatment, as the Mental Capacity Act (MCA) requires.

The Doctor discussed the problem with Mr H along with the possible causes and the need for further investigations and a medical procedure involving a general anaesthetic. Mr H had the right to be supported to make his own decisions and was given all appropriate help, including having a close relative accompany him to

reassure and explain things in a way that he was familiar with. The Doctor also drew a simple diagram to help Mr H focus and understand more about the procedure.

However, it became apparent that Mr H was not able to remember the information and was unable to weigh up the benefits and risks of having or not having the procedure. On the balance of probability, it was deemed that Mr H lacked the capacity to make the decision to consent to the procedure.

The MCA states that, if a person cannot make a specific decision (for Mr H it was being able to agree to a procedure to help professionals understand the cause of his physical ill health), any action carried out must be in the person's best interest. Therefore it was agreed to have a best interest meeting with Mr H, his family

and medical staff with written information provided by his family GP. The meeting considered the options of either having or not having the procedure and the benefits and risks of both. After hearing the views and assessments from everyone and considering Mr H's past views and wishes about health matters, it was concluded that it was in his best interest to have the procedure.

The procedure went ahead, the cause of Mr H's health problem was diagnosed and treated appropriately and he made a good recovery.

**Rhiannon Mainwaring**  
**Lead Nurse Mental Capacity Act and Deprivation of Liberty Safeguards**  
**Wye Valley NHS Trust**

## Priority 4 - Operational Effectiveness

### • **Shared learning**

The Board now has a Multi-Agency Workforce Strategy to ensure that the workforce has the appropriate skills and knowledge in relation to safeguarding. A new training evaluation process has been established and this will enable the sub group to measure if the learning events have made an impact on the knowledge and skills of the attendees.

HSAB has established a series of multi-agency 'practitioner forums', for front line practitioners and managers, which aim to:

- Support practitioners to take a professional judgement-based approach to safeguarding rather than purely a process driven one
- Share good practice and experience across agencies to improve standards
- Share learning from audits, investigations and serious case reviews
- Act as a conduit for the HSAB to share key messages and information with front line practitioners and receive feedback so that the voice of the practitioner informs HSAB's work

### • **Links into commissioning and public health**

A consultant of Public Health is a member of the board which ensures commissioning arrangements are informed by strategic cross agency discussions.

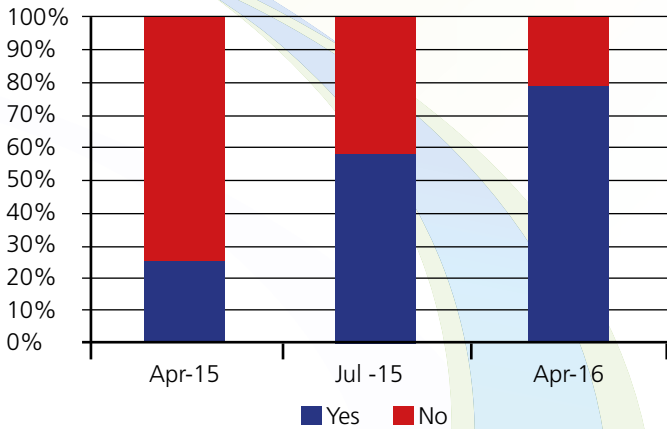
### • **Embed Making Safeguarding Personal**

During the HSAB development day in December 2016, the council presented its findings from an internal review of Making Safeguarding Personal (MSP). The Board members considered the findings and recommendations and agreed an action plan, which will ensure leadership to develop and embed improvements across organisations.

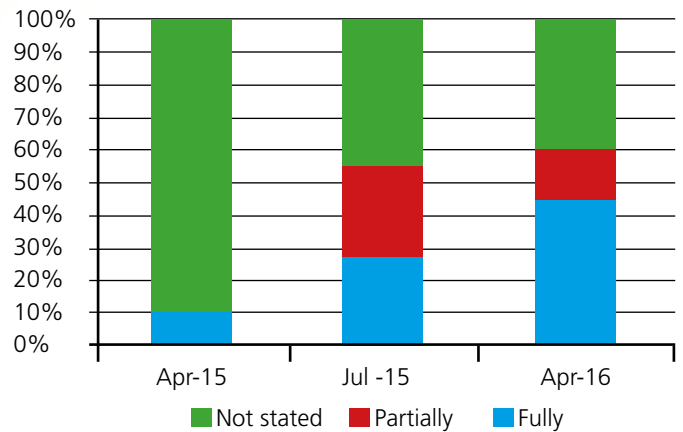
All partner agencies committed to promoting MSP and agreed to undertake one activity which would begin to underpin it as a principle within their organisation. This activity will be monitored throughout the year by the performance and quality assurance sub group.

**MSP audit results**

*Did the investigating officer ask the service user or their representative what outcomes they wanted to achieve from the safeguarding process?*



*Did the investigating officer consider / ask whether or not these outcomes had been met and whether the service user or their representative considered that the safeguarding process had been worthwhile?*



## Case study - Making Safeguarding Personal in hospital

Mr Q is 64 years old and was admitted to hospital with medical problems. He had capacity to make decisions in relation to his care and treatment and where he wanted to live.

Mr Q's wife had died six months prior to his admission to hospital and he had no other family or friends to support him at home. Mr Q and his wife had been inseparable and after her death he had become depressed and lost interest in taking care of himself and his home.

The hospital safeguarding nurses met with Mr Q whilst he was in

hospital, and whilst he recognised that he was struggling, he was initially reticent to discuss some of the difficulties he was having at home. The nurses explained to him that no one would be making decisions for him and this reassured him enough to speak about his problems.

Over a two week period, the safeguarding nurses met with Mr Q on several occasions and developed a good rapport with him, ensuring he had choice and control over any decisions made. Mr Q thought it was a good idea to start taking medication for his depression and agreed to attend bereavement

counselling. He also agreed to be referred to the council's adult social care and when he left hospital a daily package of care was put in place to help support him to keep on top of things at home.

By engaging Mr Q in conversation on how best to support him at home, he remained firmly at the centre of all decisions and this has ultimately improved his quality of life, wellbeing and safety.

**Cath Holberry**  
**Lead Nurse Adult Safeguarding**  
**Wye Valley NHS Trust**

- **Embed competency framework**

Following on from the 2015 launch of the HSAB Workforce Development Strategy, which included the competency framework, work on a joint children's and adults safeguarding (HSCB and HSAB) strategy has been completed. It now includes the ability for organisations to have their training validated.

The validation scheme requires organisations to show how their training is making a difference to the people who use their services and how the competency framework is used within the organisation to ensure a competent workforce.

- **Multi-agency training**

The Board does not commission training, but through its competency framework, it holds partner agencies and commissioned service providers to account for the quality of training for its staff.

The practitioner forums, which are held at regular intervals throughout the year, are an opportunity for professionals from all agencies to meet and exchange ideas and share learning.

- **Better priority tracking**

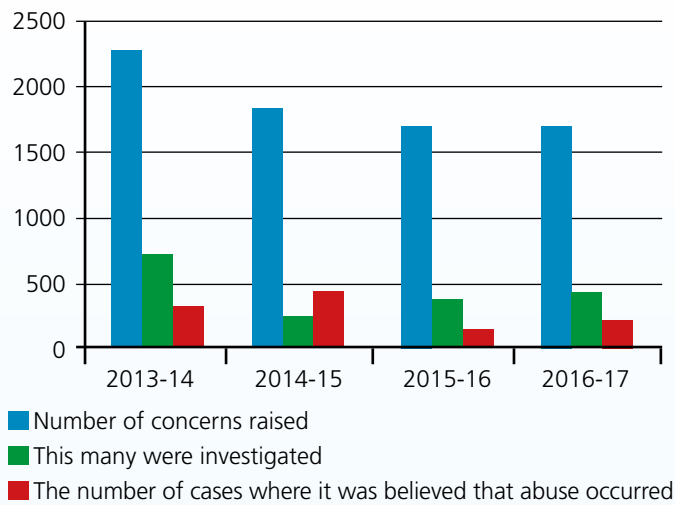
The Business Unit, which supports the work of the Board, the Children’s Safeguarding Board and the Community Safety Partnership, has oversight of all work streams. Where there are cross cutting themes, such as domestic violence, it identifies a lead Board to progress actions and provide assurance across the partnership. This oversight ensures that duplication of effort is avoided and that all partner agencies are aware of developments.

- **Partner agencies and providers are aware of legislation and raise appropriate referrals**

The council receives all safeguarding concerns from partner agencies and members of the public. Where agencies are consistently raising concerns that do not meet the threshold for safeguarding, council practitioners will work with them so they better understand when a safeguarding referral is appropriate and when some other course of action may be used.

The following graphic shows that over the four year period the proportion of concerns being raised which are investigated is increasing. This shows we are making progress but there is still more to do.

### About the concerns regarding abuse that have been raised



- **Communities and individuals are aware of what safeguarding means, who to contact and when**

The Board continues to raise awareness of safeguarding across Herefordshire in a variety of ways and will continue to do so. Several campaigns have been supported by the Board and new materials have been developed and distributed across agencies. We plan to deliver awareness raising sessions for councillors and parish councils, the outcome of which will be recorded in next year’s report.

- **Service providers deliver quality care**

Within Herefordshire, there are 79 homes which deliver residential and nursing care and 53 community care service providers, which are regulated by the Care Quality Commission (CQC).

Herefordshire Council and Herefordshire Clinical Commissioning Group complement the CQC’s work through the Quality Assurance Framework. This was introduced in 2016 and is now fully embedded into practise and dictates that services showing heightened risk are visited by the council’s quality and review team.

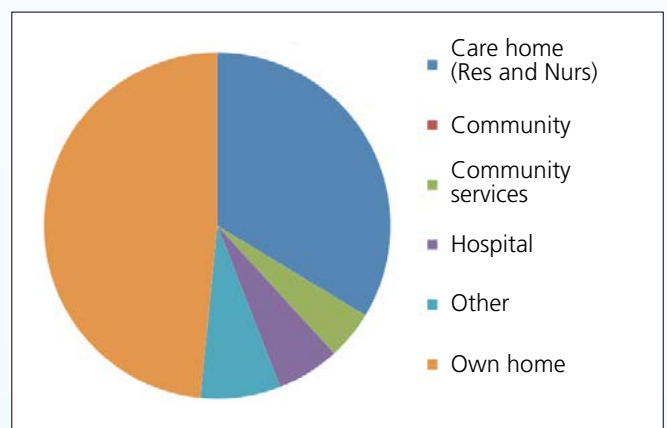
In the 12 month period from April 2016 to March 2017, the team has undertaken interventions with 18 care homes and 8 community services. Services are visited on numerous occasions, in line with agreed processes to review and monitor.

There have been approximately 190 quality and review site visits to monitor services in the 12 month period from April 2016 to March 2017. These visits may have involved more than one council officer and also include visits undertaken out of office hours, such as evenings, weekends and bank holidays. The visits continue until the quality of the service has improved.

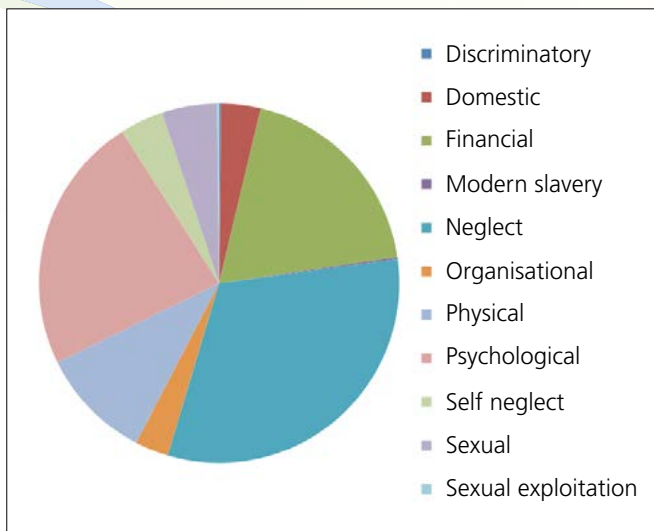
This new way of working is designed to ensure the delivery of high quality care and support services in Herefordshire.

### What does safeguarding look like in Herefordshire?

This shows where abuse has been reported



This shows what type of abuse has been reported?

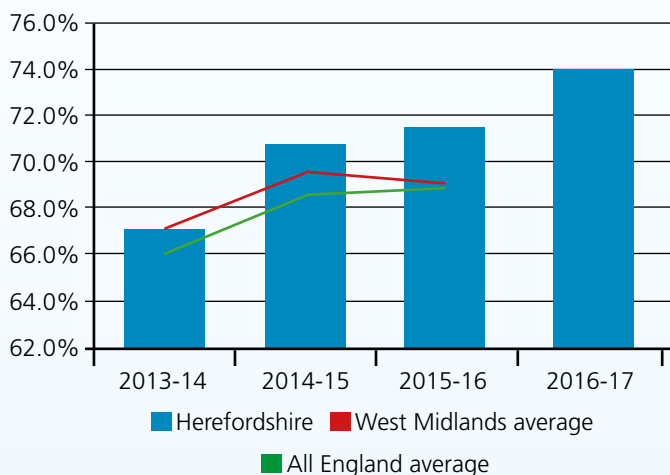


Every year the local council takes part in a survey, commissioned by the government, collecting multi-agency performance data and asking individuals about their experience of care.

Some key highlights are:

**Proportion of people who use services who feel safe**

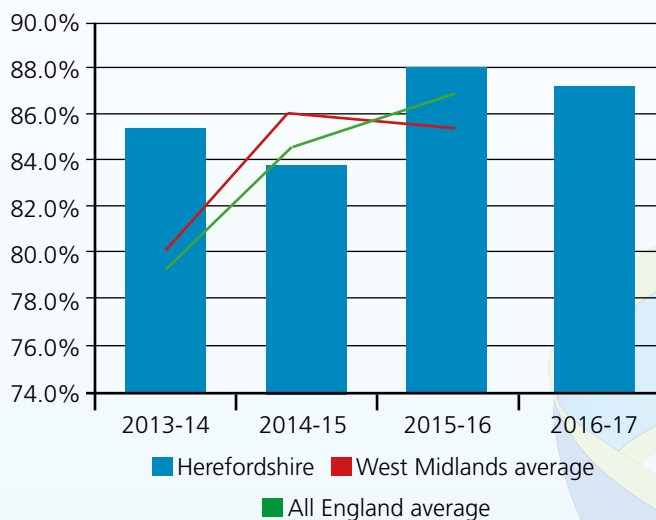
|                       | 2013-14 | 2014-15 | 2015-16 | 2016-17           |
|-----------------------|---------|---------|---------|-------------------|
| Herefordshire         | 67.1%   | 70.9%   | 71.5%   | 74.0%             |
| West Midlands average | 67.1%   | 69.5%   | 69.2%   | Not yet available |
| All England average   | 66.0%   | 68.5%   | 68.9%   | Not yet available |



\*Figures for 2015/16 are not yet finalised and may be subject to change

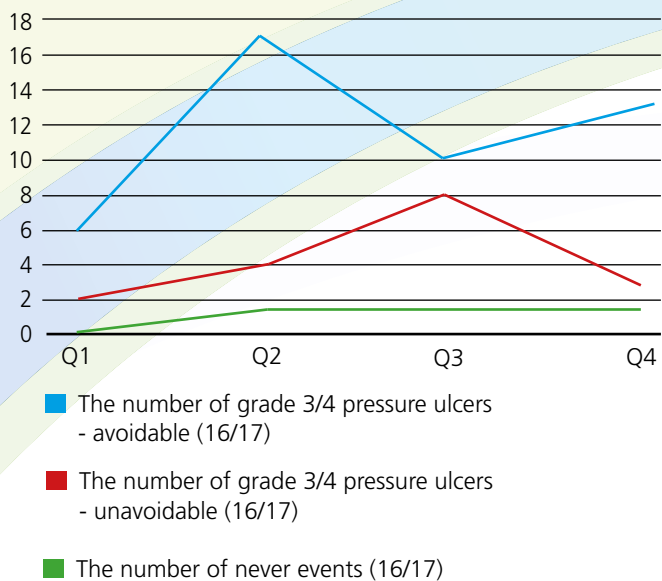
**Proportion of people who use services who say that those services have made them feel safe and secure**

|                       | 2013-14 | 2014-15 | 2015-16 | 2016-17           |
|-----------------------|---------|---------|---------|-------------------|
| Herefordshire         | 85.5%   | 83.9%   | 88.0%   | 87.0%             |
| West Midlands average | 79.9%   | 86.1%   | 85.4%   | Not yet available |
| All England average   | 79.2%   | 84.5%   | 86.7%   | Not yet available |



\*Figures for 2015/16 are not yet finalised and may be subject to change

## Wye Valley NHS Trust

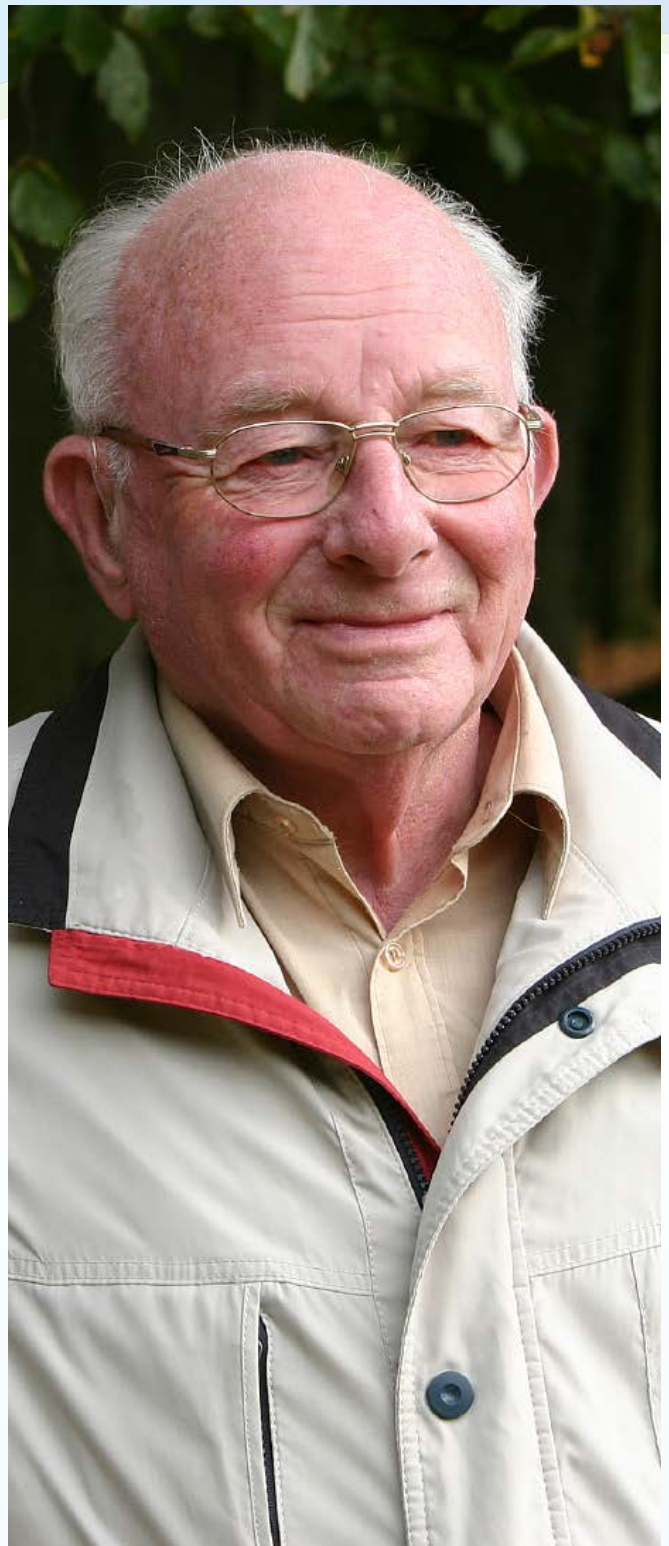


For each reported incident, a root cause analysis review is carried out and learnings from this are shared with hospital staff, with a view to improving clinical practise and knowledge across the trust.

In January 2017, the trust set up a Pressure Ulcer Panel where all pressure damage is reviewed, themes identified and training and support targeted to the appropriate clinical area.

## Peer challenge

Following on from the original peer challenge which took place in September 2015 and was detailed in last year's report, a second visit has taken place to review our progress against the original action plan. The peer challenge team recognised that we have made some real changes to the way we work, including that HSAB is no longer dominated by the council and is much more engaged with all partners. They complimented the independent chair on his strong leadership, as well as the political leadership from the Cabinet member. They did make some additional recommendations, which we are adding to the action plan and will continue to work towards completing through 2017/18. You can view the full suite of documents on our website.



# How the Board works to deliver results

The Board brings together representatives from:

- Herefordshire Council social care and public health teams
- Herefordshire Clinical Commissioning Group (responsible for the purchase of health care)
- Wye Valley NHS Trust and 2Gether NHS Foundation Trust (health care providers)
- Healthwatch
- West Mercia Police
- National Probation Service
- Community Rehabilitation Company
- Herefordshire Housing
- West Midlands Ambulance Service NHS Foundation Trust
- Hereford & Worcester Fire and Rescue Service
- Members from provider and voluntary services

This multi-agency approach ensures that all partner organisations work cohesively, using the same information and communicate consistent messages to provide the strategic direction for the work undertaken on their behalf.

It is the task of the strategic Board to agree the priorities for the year, in consultation with Healthwatch and the community and to inform the executive group of these.

Sub groups develop work plans aligned to each priority, which contain the activity required to deliver the priorities. Each sub group chair is responsible for reporting successes, developments and any barriers to progress to the executive.

The executive sub group of the board is the group which ensures delivery against priorities is on track. Where progress is not being made the executive group make recommendations to the Board on what needs to change for progress to then be made.

## What the sub groups have delivered this year:

### Performance and Quality Assurance

#### **Terms of reference:**

This group is responsible for data quality, audit and effective information systems to meet current and future expected national and local data reporting requirements and enable performance to be managed and reasonable assurance secured on the quality of local safeguarding.

## Chairs update

**Lynne Renton**

**Director of Nursing, Herefordshire CCG**

During the year, the sub group has carried out, in conjunction with the council's Children's Wellbeing directorate, an audit of young people transitioning between children's and adults services. This showed that for most of the individuals, support continued effectively over this period, however some of the agency processes were not adhered to and communication between agencies was not always as robust as it might have been. Measures have been put in place to improve this.

An MCA audit was issued to all Herefordshire care home providers, which resulted in a poor response rate of only 18%. The reason for the low response rate is now understood by the Board and this will be taken into consideration when other audits are undertaken. Despite the low response rate, the audit did highlight some consistent themes, which were shared with the MCA / DoLS sub group which incorporated them into their work plan to progress.

Findings from audits and round table reviews are shared with the joint workforce development sub group to inform training and the practitioner forum, where appropriate. Training has also been delivered to nursing homes, focussing on accountability, responsibility and challenge.

An annual assurance buddying exercise was completed and demonstrated good compliance with safeguarding processes across statutory agencies.

The work plan for 2017/18 includes a re-issue of the annual assurance proforma for completion by Board partners.

Wye Valley NHS Trust's "Do not attempt Cardio Pulmonary Resuscitation" (DNACPR) policy was agreed through their governance process. Previous discussions elicited support from statutory partners to adopt this policy throughout Herefordshire and training was commissioned through January and February from the CCG's legal advisors to support this.

Messages from the performance and quality assurance sub group are shared with the communications sub group, where appropriate, for dissemination across the partnership.

## Policies and procedures

### Terms of reference:

This group aims to ensure there is a comprehensive catalogue of policies which underpin the multi-agency safeguarding procedures. Its goal is that staff across the partnership has access to the necessary range of multi-agency safeguarding and adult protection policies and procedures and that these are embedded into practice. It also includes the review and maintenance of existing policies.

### Chairs update

**Alison Feher**

**Safeguarding Lead, 2gether NHS Foundation Trust**

The latest version of the West Midlands Multi-Agency Safeguarding Adult Policy and Procedures was published in September 2016.

This document is the main procedural multi-agency adult safeguarding point of reference for practitioners and was ratified by the HSAB policies and procedures (P&P) group in 2016. We will continue to contribute to the regional group, which develop and update this key document.

The regional policy and procedures sub group also devised the West Midlands Position of Trust Framework during 2016/17. This document was agreed by the P&P group and was published in Herefordshire in January 2017.

Locally, various other policies and guidance have been developed by the P&P group to assist professionals. This includes the Self Neglect Policy (published 2016), the HSAB Resolving Professional Disagreements Policy (published 2017) and the HSAB Professionals Guidance (published 2016).

Activity that has moved into 2017/18 includes the implementation of phase two of Making Safeguarding Personal (MSP) and development of the Child Sexual Exploitation (CSE) Transition Policy with the Herefordshire Safeguarding Children Board CSE and missing children sub group. The P&P sub group will also be involved in implementing the MSP phase two documentation.

The Female Genital Mutilation (FGM) and Modern Slavery and Human Trafficking policies sit with the Herefordshire Community Safety Partnership, but the P&P group will be actively contributing to them.



The P&P sub group was previously required to disseminate key messages and learning to agencies and professionals. This role now sits with the newly formed cross partnership communications sub group. The P&P group will work with this sub group in 2017/18 to promote policy changes and new guidelines. During 2016 /17, effective dissemination of P&P news and policy changes came about through the practitioners forum, which is held quarterly.

Over the past 12 months the P&P sub group has formally met on four occasions: 14 June 2016 (4 attended), 13 September 2016 (6 attended), 15 November 2016 (8 attended) and 7 March 2017 (5 attended). Additional meetings have been arranged to move business along outside the formal P&P forum and whilst attendance has been inconsistent, work has been completed and the annual work plan achieved.

## Mental Capacity Act and Deprivation of Liberty Safeguards

### Terms of reference:

This group provides clear leadership on the promotion of the application of the Human Rights Act, Mental Capacity Act and the Deprivation of Liberty Safeguards in everyday clinical practice and ensures that a framework is in place to support staff in relation to their responsibilities and monitor compliance with this legislation.

## Chairs update

### Jane Higgins Mental Capacity Act and Mental Health Manager, Herefordshire Council

The HSAB MCA/DoLS sub group has engaged in a number of activities to raise awareness and improve practice in relation to the MCA and DoLS, including:

- Undertaking an audit of care providers and organisations in relation to their awareness and implementation of the MCA
- Updating the new HSAB website with a range of information, tools and resources regarding MCA and DoLS for members of the public and practitioners
- The creation of leaflets providing a quick guide to the MCA and DoLS
- The creation of legal case law newsletters for professionals
- Attendance at an event in High Town, Hereford to promote the work of the HSAB and raise awareness of the MCA and DoLS
- Production of bookmarks, available for practitioners for use a quick guide

The sub group is also in the process of organising an MCA conference.

Herefordshire DoLS Service continues to experience high referral rates, however the service has been working hard to start to stabilise and reduce the number of referrals awaiting assessment. All referrals are triaged to ensure that people who are most at risk, as a result of being deprived of their liberty, are assessed quickly. The DoLS team is working closely with the quality and review team to ensure that cases where there are concerns about the quality of care being received are prioritised.

The DoLS team continues to work closely with a pool of independent assessors to complement the team's in house assessors and is proactive in expanding its pool of workers to help maintain assessment capacity.

# Joint training and workforce development

## **Terms of reference:**

This group is responsible for developing and maintaining Herefordshire's competency framework and provides evidenced assurance that partner agencies are meeting the requirements of the framework.

The group has particular responsibility to ensure that multi-agency development opportunities exist for all practitioners. By undertaking such activities, the group will ensure people working with or engaging with adults at risk in Herefordshire understand their responsibilities.

## **Chairs update**

**Alison Chambers**

**Project Officer, Training and Development, Hoople Ltd**

The Multi-Agency Workforce Strategy, which determines the workforce development plans for all who work with and support adults at risk to ensure that they are skilled and competent, has been refreshed. It has been updated to include learning from reviews and changes to legislation. The updated strategy includes a process whereby provider services / training providers apply to have their training programmes validated as meeting the requirements of the strategy and competency framework.

This new strategy and validation process ensures HSAB meets the requirement of the Care Act 2014, which states:

"In order to respond appropriately where abuse or neglect may be taking place, anyone in contact with the adult, whether in a volunteer or paid role, must understand their own role and responsibility and have access to practical and legal guidance, advice and support. This will include understanding local interagency policies and procedures" (14.43 Care Act 2014).

The new evaluation process has been established and used with learning events delivered on behalf of the HSAB. This will enable the sub group to measure if the learning events have made an impact on the knowledge and skills of the workforce and those who access services.

The improving numbers attending the practitioner forums is encouraging with the last two forums being booked to capacity. We have had 330 bookings and 236 practitioners attend over seven sessions this year from 48 agencies. This forum programme included dissemination of learning from Safeguarding Adults Reviews (SAR's), informing practitioners about the work of the Board, Care Act and Making Safeguarding Personal.

From each forum, a Voice of the Practitioner report is developed and presented to the executive group.

A specialist 'Silent Victim' conference was held this year at The Kindle Centre, Hereford on 19 October and was attended by 122 practitioners drawn from over 30 agencies based in Herefordshire. Evaluations from the event were positive, particularly for two presenters, who were talking from their own personal experience, and the session highlighted the barriers faced by people from minority communities.

## Joint Case Review (JCR)

The Board has a legal duty to undertake a review of cases where an adult at risk has died or suffered serious harm, as set out in the Care Act 2014. The reviews involve all agencies which were, or should have been, working with the adult and are used to identify learning outcomes for practitioners.

## **Chairs update**

**Mandy Appleby**

**Principal Social Worker, Herefordshire Council**

The chairing arrangements of this sub group have been reviewed this year and a new chair, with greater knowledge of adult safeguarding, has been appointed. This will lead to better management of the process, which has caused drift in previous cases, with learnings not getting to front line practitioners in a timely way.

One referral was received within this period, which did not meet the threshold for a Safeguarding Adults Review (SAR).

One SAR report, commissioned in 2015, has been received by the sub group. The independent chair felt that not all learnings had been identified and requested some additional work to take place. This has not been completed within the reporting period, so will be included in next year's report.

One SAR report has been approved by the sub group and chair and this led to a learning event attended by practitioners. It has also led to changes in recording on the council's case management system, changes in cross border commissioning arrangements and resources for practitioners being readily made available in respect of MCA and DoLS.

One Practice Learning Review (PLR) has been completed and the recommendations from this have been overseen and monitored by the sub group.

The availability of suitable independent authors to write these reviews continues to be a concern for the Board and they are considering ways of managing this, should future SARs be commissioned.

# Communications

To ensure that the key messages identified from any of the Boards' strategic priorities are appropriately communicated via the most effective conduit, consistent with the statutory requirements of the boards.

## **Chairs update**

**Steve Eccleston**

**Business Manager, Safeguarding Business Unit**

The Board shares a joint communications sub group with the Safeguarding Children Board and Community Safety Partnership. The purpose of this sub group is to ensure that all safeguarding communications across the partnerships are as co-ordinated and effective as possible.

The sub group is aware of the Boards priority areas and looks to ensure these are captured in communications. Importantly the group also share what each agency is doing on communications about particular topics, so it can be more informed and co-ordinated about messages given to partners and the community. To develop this co-ordination further, the sub group is now working closely with the One Herefordshire Strategic Communication and Engagement Group, which is a forum led by Herefordshire Clinical Commissioning Group.

## What the sub groups will deliver next year:

### Introduction

A review of the priorities agreed for 2016/17 took place in November 2016 and future improvement opportunities were identified for populating the work plans for 2017/18.

These align to the existing priorities:

- Partnership working
- Prevention and protection
- Communications and engagement
- Operational effectiveness

| Strategic priorities | Partnership working  | Prevention and protection  | Communications and engagement  | Operational effectiveness  |
|----------------------|--|--|--|--|
| <b>Aim</b>           | To develop relationships across agencies that deliver positive changes to safeguarding | To ensure that Herefordshire residents can recognise safeguarding concerns and know what to do | To deliver the messages from the Board and recognise the voice of those we safeguard | To ensure safeguarding knowledge, processes, systems and structures are embedded across all agencies |

The document at appendix 1 shows the 2017 - 18 strategic priorities and the sub group work plans to deliver this.

## Appendix 1

| Strategic priorities             | Partnership working   | Prevention and protection   | Communications and engagement   | Operational effectiveness   |
|----------------------------------|---|---|---|---|
| <b>Strategic Board work plan</b> | <p>Single agency contributions to annual report</p> <p>Develop and monitor action plans arising from Making Safeguarding Personal (MSP) review</p> <p>Promote MSP across all partner agencies</p> | <p>Review prevention strategy</p> <p>Monitor prevention work plan</p> | <p>Ensure the messages from the Board are communicated in a timely and consistent manner</p> <p>Ensure the voice of those who have been safeguarded are considered in the work of the Board</p> <p>HSAB partners to ensure MSP messages and awareness are cascaded to staff</p> | <p>Publish annual report on the effectiveness of local safeguarding arrangements</p> <p>Ensure the needs of adults at risk are addressed in the JSNA and HWB strategies</p> |

## Sub group work plans

| Delivery group         | Partnership working   | Prevention and protection   | Communications and engagement   | Operational effectiveness   |
|------------------------|---|---|---|---|
| <b>Executive group</b> | <p>Monitor relevant sub group work plans</p> <p>Oversee delivery of action plan arising from peer review</p> <p>Learning from other areas, including Domestic Homicide Reviews, Safeguarding Adults Reviews and Serious Case Reviews</p> <p>Monitor risk register</p> | <p>Monitor relevant sub group work plans</p> <p>Monitor risk register</p> | <p>Monitor relevant sub group work plans</p> <p>Monitor risk register</p> | <p>Monitor relevant sub group work plans</p> <p>Monitor risk register</p> |

| Delivery group               | Partnership working  | Prevention and protection                      | Communications and engagement | Operational effectiveness   |
|------------------------------|--|--|-------------------------------|---|
| <b>Policy and procedures</b> | <p>Maintain up to date HSAB procedures that align with sub regional arrangements and address cross border issues</p> <p>Embed MSP protocols into practice</p> <p>Embed Mental Capacity Act (MCA) protocols into practice</p> | <p>Embed self-neglect policy into practice</p> | <p>Launch of new policies</p> | <p>Report to executive group</p> <p>Embed new policies</p> <p>Contribution to the annual report</p> |

| Delivery group      | Partnership working  | Prevention and protection                              | Communications and engagement  | Operational effectiveness   |
|---------------------|--|--|--|---|
| <b>MCA and DoLS</b> | <p>Develop suitable tools for all professionals to aid understanding</p> <p>Multi-agency audit</p> | Gather evidence of the voice of those without capacity | <p>Raise awareness of MCA and Deprivation of Liberty Safeguards (DoLS), via:</p> <ul style="list-style-type: none"> <li>• Website</li> <li>• Roadshow</li> <li>• Newsletter</li> </ul> <p>Increase awareness of the Court of Protection</p> <p>Increase the understanding of consent</p> | <p>Report to executive group</p> <p>Contribution to the annual report</p> |

| Delivery group                       | Partnership working  | Prevention and protection  | Communications and engagement   | Operational effectiveness   |
|--------------------------------------|--|--|---|---|
| <b>Performance and quality audit</b> | <p>Monitor multi-agency and single agency scorecards</p> <p>Programme of multi-agency audits</p> <p>Introduce multi-agency MSP audit</p> | <p>Monitor results of the activity undertaken by the Community Safety Partnership (annual)</p> <p>Audits to include the voice of those without capacity</p> <p>Adapt council audit format to include the voice of the carer</p> <p>Monitor support provided to carers and young carers</p> | <p>Introduce seven minute learnings for findings from audit and SARs</p> <p>Six monthly reports from MIR evaluating their work with vulnerable groups</p> | <p>Report to executive group</p> <p>Monitor the effectiveness of services provided to adults at risk via a six monthly report from the quality and review team</p> <p>Continue to review performance measures and reporting</p> <p>Contribution to the annual report</p> <p>Monitoring of single agency actions relating to MSP</p> |

| Delivery group               | Partnership working  | Prevention and protection   | Communications and engagement                                      | Operational effectiveness   |
|------------------------------|--|---|--|---|
| <b>Workforce development</b> | <p>Practitioner forum</p> <p>Engage with front line staff and use their experiences to inform HSAB activity</p> <p>Ensure learning from MSP review is aligned to competency framework</p> <p>Develop familiarisation workshops for MSP</p> | <p>Empower staff to deliver person centered care</p> <p>Empower staff to professionally challenge</p> | <p>Ensure competency framework is embedded across all partners</p> | <p>Report to executive group</p> <p>Develop safeguarding supervision standards and guidance</p> <p>Develop guidance to support partner agencies to evaluate training</p> <p>Contribution to the annual report</p> |

| Delivery group    | Partnership working | Prevention and protection | Communications and engagement   | Operational effectiveness             |
|-------------------|---------------------|---------------------------|---|---------------------------------------|
| <b>Safe voice</b> |                     |                           | <p>Obtain views of safeguarding and services</p> <p>Develop independent arrangements to verify service user feedback of the safeguarding experience (MSP)</p> | <p>Review of user facing material</p> |

| Delivery group        | Partnership working                | Prevention and protection   | Communications and engagement  | Operational effectiveness  |
|-----------------------|------------------------------------|---|--|--|
| <b>Communications</b> | <p>Promote RIPFA as a resource</p> | <p>Promote community resilience for town and parish councils</p> <p>Raise understanding and awareness of the advocacy offer</p> | <p>Raise awareness of adults at risk</p> <p>Sharing of best practice and case studies</p> <p>Dissemination of shared learnings</p> | <p>Report to executive group</p> <p>Contribution to the annual report</p> <p>Raise awareness of partner agencies</p> |

|  | Partnership working   | Prevention and protection  | Communications and engagement  | Operational effectiveness   |
|--|---|--|--|---|
| <p><b>Key outcome measures:</b></p> <p><b>How will we know how successful we have been</b></p> | <ul style="list-style-type: none"> <li>• Partner agencies are committed and attendance at meetings is at least 80%</li> <li>• The Board is aware of voluntary and community organisations and the work undertaken to support the safeguarding agenda</li> <li>• Other Boards are aware of the work of the HSAB Board and engage effectively when required</li> <li>• Partner agencies are showing progress in MSP</li> <li>• Multi-agency attendance at practitioner forums and learning events</li> <li>• Bi-annual assurance statements received from all partners</li> </ul> | <ul style="list-style-type: none"> <li>• Production and publication of a prevention strategy and work plan</li> <li>• Partner agencies and providers are aware of legislation and raise appropriate referrals</li> <li>• MCA, DoLS and MSP are embedded into practice</li> <li>• Adult safeguarding information is incorporated into the Joint Strategic Needs analysis</li> <li>• Workforce is supported to exercise professional judgement / challenge</li> <li>• Hereford &amp; Worcester Fire and Rescue Service safety checks are carried out for 2,000 households</li> </ul> | <ul style="list-style-type: none"> <li>• Messages from the Board are effectively disseminated</li> <li>• Communities and individuals are aware of what safeguarding is</li> <li>• Communities and individuals are aware of the Mental Capacity Act</li> <li>• Communities and individuals are aware of Deprivation of Liberty Safeguards</li> <li>• Communities and individuals are aware of Lasting Power of Attorney</li> <li>• Seven minute learnings are recognised as a learning tool</li> <li>• All relevant national campaigns are promoted by the Board</li> </ul> | <ul style="list-style-type: none"> <li>• Service providers deliver quality care</li> <li>• Workforce is well trained / supervised</li> <li>• Learnings from SARs are embedded into practice</li> <li>• Priorities are tracked effectively</li> <li>• A truly multi-agency scorecard is available</li> </ul> |



## Appendix 2

To deliver the above, the Business Unit is used, which is a multi-agency funded team overseeing the work of the Board and its sub groups. The unit is funded as follows:

Contributions from statutory partner agencies for 2016/17 remained the same as in 2015/16 at a total of **£383,964**.

**Note:** This total contribution is for the support of the Herefordshire Safeguarding Adults Board, Safeguarding Children Board and the Community Safety Partnership

### Projected costs 2016/17:

#### Staffing costs:

The staffing complement, as identified in the establishment of the Business Unit, is as follows:

Business Unit Manager: Full time  
 Learning Development Officer: Full time x 3  
 Training Officer: Part time x 0.41  
 Business Support: Full time x 3

|                                  |                 |
|----------------------------------|-----------------|
| Basic pay and on costs           | <b>£292,738</b> |
| Independent HSAB and HSCB chairs | <b>£ 38,520</b> |
| Council recharge costs           | <b>£ 32,000</b> |

|                          |                 |
|--------------------------|-----------------|
| <b>Total expenditure</b> | <b>£363,258</b> |
|--------------------------|-----------------|

|   |                 |
|---|-----------------|
| Balance   | <b>£ 20,706</b> |
| Potential income from training based on 2015/16 figures | <b>£ 14,000</b> |

|   |                 |
|---|-----------------|
| <b>Final balance (assuming same income from training)</b> | <b>£ 34,706</b> |
|---|-----------------|

### Proposed use of partnership budget for 2016/17

#### WFD training offer

|  |                 |
|--|-----------------|
| Administration of training programmes (face to face, bookings, evaluation, reporting, training needs analysis etc) | <b>£ 15,900</b> |
|--|-----------------|

|   |                 |
|---|-----------------|
| Cost of face to face training: HSCB, joint HSAB / HSCB practitioner forums to be covered by funds designated to the Training Officer Post (contained within the above staffing costs) | <b>£ 10,034</b> |
|---|-----------------|

**Note:** The Business Unit is developing a multi-agency training pool for partners to deliver training together (contributions in kind), wherever possible and using free venues, where refreshments can be easily purchased by course participants (such as the council's Plough Lane office).

The Business unit is also collating and making available any free to access e-learning courses, which will be made available on the HSAB / HSCB joint website.

|                                     |                 |
|-------------------------------------|-----------------|
| <b>Total cost of training offer</b> | <b>£ 25,934</b> |
|-------------------------------------|-----------------|

|                         |                 |
|-------------------------|-----------------|
| <b>Residual balance</b> | <b>£ 18,806</b> |
|-------------------------|-----------------|

The residual balance is what remains to cover any Serious Case Reviews, Serious Adult Reviews, annual conference / promotions and any sundry costs.

## Position Statements for HSAB Annual Report

With the implementation of the Care Act 2014 and the new statutory duties placed upon local councils, Herefordshire Council has placed even greater emphasis on working with its partners, communities and residents to encourage, support and facilitate the safety and wellbeing of those who are exposed to or are vulnerable to abuse, exploitation and discrimination in all its forms.

In 2016/17, the council completed a review of Making Safeguarding Personal (MSP) which it had introduced in readiness for the Care Act in January 2015. The vision in 2015 was to develop a safeguarding culture that focused on personalised outcomes, desired by people who may have been abused, as a key operational and strategic goal.

The purpose of the MSP review was to establish the success so far in delivering the initial vision for a more personal approach and to inform further improvements required of the established MSP safeguarding processes, which are led by the council's operational social care services. Additionally, the review sought to ensure that all partners participated in evaluating the effectiveness of shared responsibilities to safeguarding and making safeguarding personal. As part of this review, the Head of Safeguarding participated in the National MSP evaluation. This has assisted us to develop our safeguarding approach alongside progress made nationally. The MSP review, including the action plan of recommendations, was received positively by the West Midlands Peer Challenge team, whose remit was to review progress made since their earlier review of safeguarding in 2015.

Herefordshire Council has continued to forge strong links regionally and nationally to assist in developing safeguarding services that are personal, responsive and effective. There are established professional roles to facilitate the safeguarding agenda, including the roles of Principal Social Worker and Head of Safeguarding, Operational Safeguarding Lead and Mental Capacity and Deprivation of Liberty Lead. All the council's adults and wellbeing professional leads work closely with the Herefordshire Safeguarding Boards and / or sub groups and with all agencies, such as the NHS, police, probation and local service providers, to prevent or reduce factors that can lead to abuse and ensure there is confidence in how to support a person who is in need of a safeguarding approach. More recently, the council's Assistant Director of adults and wellbeing operational services has been appointed as the Chair of the Association of Directors of Adult Social Services (ADASS) West Midlands Safeguarding Network.

Herefordshire Council has provided a representative on the West Midlands multi-agency safeguarding editorial group to re-write the multi-agency procedures. These procedures are now published on the HSAB website. The council has also led the development of the Mental Capacity and Deprivation of Liberty guidance and has provided bespoke training across a range of provider agencies. The framework and process for 'allegations about a person in a position of trust' as set out in the statutory guidance and the West Midlands multi-agency guidance, has been developed by the council, agreed by HSAB and is now implemented.

We have implemented a three step process to safeguarding to support practitioners in promoting a responsive and personal service, with an aim of promoting less time on process and more time for face to face contact with the individuals involved. This is an example of responding to feedback from professionals during the review as well as to the recommendations of the Safeguarding Peer Challenge Review influencing improvements.

The council has now completed phase one of the operational 'whole systems' pathway design, which realigned internal resources so it could meet increases in demand and reflect the focus of the Care Act towards personalised approaches (such as Making Safeguarding Personal) and strengths based approaches to assessment and support planning. Plans are now in place to train operational and commissioning staff in the principles of strengths based practice and commissioning. This encompasses the principles of safeguarding and making safeguarding personal and will support the sustainability and resilience of our communities

### **Mandy Appleby**

Head of Safeguarding and Principal Social Worker, Herefordshire Council

Clinical Commissioning Groups (CCGs) were created following the Health and Social Care Act in 2012, and replaced Primary Care Trusts on 1 April 2013, they are membership organisations that bring together general practices to commission services for their registered populations and for unregistered patients who live in their area. CCGs are responsible for commissioning most hospital and community healthcare services as well as primary care services.

In July 2015, NHS England published a document entitled 'Safeguarding Vulnerable People in the NHS – Accountability and Assurance Framework', which sets out the responsibilities of each part of the NHS system. Herefordshire CCG conforms to all the requirements set out in this document.

All staff receive yearly safeguarding training and those who have patient contact, receive regular safeguarding supervision.

As a commissioning organisation, the CCG ensures that all its commissioned services have robust safeguarding processes and policies in place. We frequently assure ourselves that these processes are robustly adhered to by holding regular Contract Quality Review Forums with all our major contractors and also conducting quality assurance visits to provider's clinical areas.

The CCG has good working relationships with partner agencies and supports the Herefordshire Safeguarding Boards, both financially and by a commitment to the functioning of the Boards, including the chairing of several sub groups.

The CCG regularly reviews its safeguarding duties by reporting performance and safeguarding developments to the CCGs Quality and Patient Safety Committee (a sub group of the Governing Body) and the Governing Body.

The CCG Governing Body receive an annual NHS system wide safeguarding report, which analyses safeguarding across all NHS services, and provides assurance that the NHS is delivering services which protect the residents of Herefordshire.

**Lynne Renton**

Deputy Director of Nursing, Herefordshire CCG

Wye Valley NHS Trust (WVT) was established in April 2011 and is the provider of healthcare services at Hereford County Hospital, along with a number of community services for Herefordshire and its borders. We also provide healthcare services at community hospitals in the market towns of Ross-on-Wye, Leominster and Bromyard.

Safeguarding vulnerable adults is everyone's business and WVT is committed to safeguarding adults across the organisation. The welfare of people who come into contact with our services either directly or indirectly is paramount and all our staff have a responsibility to ensure best practice is followed.

As part of the trust's commitment to safeguarding adults throughout all its services, we have a dedicated Adult Safeguarding Lead Nurse and in September 2016 appointed a Lead Nurse for Mental Capacity (MCA) and Deprivation of Liberty Safeguards (DoLS). The Director of Nursing is the Executive Lead for safeguarding and has clear oversight of safeguarding activity.

In line with the Care Act 2014, WVT works closely with partner agencies and is a key member of the Herefordshire Safeguarding Adults Board and its associated sub groups. We are committed to working collaboratively with other agencies, sharing information in a safe and appropriate manner. WVT produces an adult safeguarding annual report, which is also shared with partner agencies.

We have a safeguarding training programme in place to ensure staff are aware of their roles and responsibilities and act appropriately and proportionately to any concerns raised. WVT was inspected by the Care Quality Commission (CQC) in June 2016, with their final report being published in November 2016. The report showed that staff were aware of their responsibilities regarding safeguarding procedures, MCA and DOLS, knew how to raise concerns and who to go to for advice and support.

WVT has signed up to the HSAB safeguarding policies and procedures, which are available to all staff and there are local flowcharts in all clinical areas, as an immediate guide to support staff in their decision making.

WVT remains committed to making safeguarding personal, ensuring vulnerable individuals are central to the safeguarding process with their wishes and feelings being paramount.

**Lucy Flanagan**

Director of Nursing, Wye Valley NHS Trust

2gether NHS Foundation Trust (2g) continues to play an active part and is fully committed to multi-agency working, with all partners at the Herefordshire Safeguarding Adult Board, in order to safeguard adults at risk of abuse or neglect.

### **Achievements 2016/17**

2g has continued to improve the take up of training for safeguarding adults with a 'Think Family' approach. This involved Making Safeguarding Personal (MSP) and incorporated safeguarding children within the adult's social network. 2g has also hosted two events to raise awareness of the new criminal offence of coercive and controlling behaviour.

Staff working within Adult Teams, have received improved access to internal safeguarding supervision via the trust's Safeguarding Team. This is modelled on reflective practice as advocated within children's safeguarding and includes formal group and one to one sessions.

In line with the Board's objectives, 2g has specifically shared learning from Safeguarding Adults Reviews, Serious Case Reviews and other learning models, shared learning from multi-agency and single agency (internal) audits. Other staff training has focussed on domestic abuse and sexual violence, perinatal mental health, substance misuse, female genital mutilation and prevent.

2g has actively participated in Board and sub group activity, ranging from chairing sub groups, facilitating learning events (Practice Learning Reviews) and front line staff keenly partake in learning events / audits.

### **Priorities for 2017/18**

2g will continue to work in partnership to improve overall safeguarding activity, in particular to increase the recording in all aspects of safeguarding within the trust's electronic patient record. This includes participation in all sub groups, while specifically focusing on learning from multi-agency and internal single agency audits, learning from Domestic Homicide Reviews, Safeguarding Adult Reviews, Serious Care Reviews and other learning models (e.g. Practice Learning Reviews and Significant Incident Learning Process).

2g will continue to increase the provision of safeguarding supervision to teams working with adults, concentrating on MSP while ensuring the safety of children within the service user's social network.

It will also continue to update the 'Think Family' training approach (level 2), Health WRAP (Workshop to Raise Awareness of Prevent), improve statutory and mandatory training compliance, offer training in FGM and build on the training from 2016/17 in coercive control.

2g looks forward to continually improving practice with partner agencies to ensure an adult's right to live in safety, free from abuse and neglect, is protected. Acknowledging the pressures presented by the current economic climate, safeguarding adults and children remain a priority in the delivery of mental health services.

### **Quality Assurance**

2g will continue to provide assurance to the Board that safeguarding priorities are in line with best practice and evidence a positive outcome for families.

### **Alison Curson**

Deputy Director of Nursing, 2gether NHS Foundation Trust

Our vision continues to be protecting people from harm, and one of our core values includes working in partnership to provide the best service we can. This is further supported by our forces ambition 'looking to 2020' to be great at protecting the most vulnerable.

West Mercia police has recently received a 'Good' grading in the HMIC inspection, relating to legitimacy, effectiveness and leadership and was praised for our work relating to vulnerability.

It is now almost 12 months since we restructured and streamlined our investigative framework in Herefordshire to bring about one investigative criminal investigation department to incorporate the traditional CID and Protecting Vulnerable People (PVP) functions. A key driver for bringing about this change was the need to reinforce the fact that protecting vulnerable people is everyone's business and not the sole responsibility of a specific department, which had largely evolved to be the case. This has brought resources together operating deployment principles, which ensure that the most appropriate resource is allocated to deal with incidents dependent upon the threat, harm and risk of the situation and potential vulnerability of those involved. The force has invested in ensuring that more officers and staff are trained with specialist skills to investigate complex crimes, along with additional staff working in roles specially focused on protecting the most vulnerable.

West Mercia Police has launched a vulnerability strategy under the corporate branding of 'see past the obvious' and is a leading force on the national platform to promote the effective recognition and response to all forms of vulnerability, by taking a professionally curious approach to every engagement. This means understanding each situation and circumstances of every person that we come into contact with and respond appropriately to their needs, in partnership with other agencies. It is recognised that in order to achieve this, there needs to be a structured learning model and associated tools and in that regard the following has been developed and is being rolled out to officers and staff:

- Each policing area has been allocated a specific vulnerability lead at Chief Inspector level
- Recruitment of three additional staff to the learning and development department specific to the vulnerability agenda
- Development of bespoke vulnerability training
- Training of 36 Sergeants to deliver 'see past the obvious' briefing sessions
- The force has also developed innovative electronic reference guides and a training video (with others under development)

The force has invested significantly in appropriately equipping our workforce with the tools to do the job more effectively and thus protect people from harm. The introduction of laptops and smart phones, with innovative applications, enable our officers to work remotely, whilst being able to access relevant information and guidance, as well as being more visible and accessible to our communities. The provision of body worn video for officers enables them to capture evidence effectively and brings transparency to our operational work.

The force is also investing in a new investigation management system and a new command and control room, which will further improve the efficiency of our response to the most vulnerable people in our community.

So what does all this mean to adults with care and support needs? Our approach seeks to identify all forms of vulnerability and we expect officers and staff, from our very first public contact, to be professionally curious in their assessment of an individual's needs and to consider the most appropriate response to support them. This will very often be small measures, such as providing general advice through to signposting and for relevant cases referral to other agencies for either single agency or multi-agency intervention. Our approaches and training materials help our staff to specifically identify those who may have care and support needs and to respond appropriately. We do put people at the centre of our investigative processes, as required by the Victim's Code, however we do recognise that we have further work to do to fully embed the principles of Making Safeguarding Personal' in everyday policing activity. In that regard, we are developing bespoke materials relevant to this and engaging with partners to share our approach to vulnerability.

**Dean Jones**

Chief Inspector, West Mercia Police

### **Safe and well visit form**

Hereford and Worcester Fire & Rescue Service (HWFRS) has amended its Home Fire Safety Check (HFSC) form to include questions that support the work of other agencies; improving the referral process of vulnerable adults to relevant support organisations. The original HFSC form supported the fire prevention strategy for HWFRS, which incidentally provided information that resulted in a referral to other support services for vulnerable adults. The inclusion of additional new specific questions has assisted in the identification of other issues or concerns, which has enabled HWFRS to refer vulnerable adults to the correct services, improving their safety and wellbeing.

### **Shared premises: HWFRS and West Mercia Police (WMP)**

The HWFRS Community Risk Department in Herefordshire has moved into Hereford Police Station. This department is responsible for delivering preventative support (fire, road and water safety and arson reduction) across the county, including to vulnerable adults. This work is closely linked to the work of the WMP Harm Hub. The move has enabled closer working relationships to be established, leading to improved sharing of information between these organisations and will provide improved preventative services and support for vulnerable adults in Herefordshire.

### **Mark Preece (MSc MIFireE)**

Area Commander, Hereford and Worcester Fire & Rescue Service



The Care Act 2014 created a clear legal framework for how local authorities and other parts of the health and care system should protect adults at risk of abuse or neglect. West Midlands Ambulance Service Foundation Trust (WMAS), as a partner member of the adult safeguarding arrangements outlined in the act, discharge its responsibilities through a range of interconnected strategic, tactical and operational activities.

WMAS worked with representatives of the adults board to ensure our referral process is aligned to that of the Care Act and appropriately addresses some historic issues of inappropriate referrals.

The guidance was agreed by all Boards and is now current within WMAS.

### **Partnership**

WMAS regionally covers 28 adults and children's safeguarding boards and as a consequence the service does not have the resilience to send a representative to all Board meetings. WMAS has an agreement to attend at least one Board meeting a year and by invitation to address a specific matter. WMAS receive all minutes and papers and submit reports when required.

WMAS also provides information for Individual Management Reviews, short reports, briefs, Domestic Homicide Reviews and Safeguarding Adults Reviews both at scoping panel meetings and via written reports. WMAS is also a member in the new Emergency Services Group, which is scoping new ways of working and we are also on the prevent agenda.

### **Local council arrangements**

WMAS operates across the whole of the West Midlands, where all localities require information and participation, but each locality has different operating approaches, referral pathways and partnership arrangements from the other local councils.

### **Quality assurance**

West Midlands Ambulance Service is monitored and audited externally by the Care Quality Commission (CQC), which in its recent review deemed the service as 'Outstanding'. Lead commissioners regularly review our processes and peer reviews are undertaken by other ambulance services. These are supplemented by internal audit reports and regular monitoring referrals.

### **Training**

WMAS has a dedicated education and training department, which is responsible for the delivering and auditing of training. All WMAS staff members receive safeguarding training, however the method and level of training varies dependant on individual job roles. Training is delivered via mandatory workbooks, face to face and e-learning packages. WMAS, as an organisation, collates and disseminates learning from SAR / DHRs and use that to feed into policies and procedures.

WMAS safeguarding team members attend multi-agency training at a variety of levels and the trust set a target of 85% and achieved an overall average of 91%.

### **Lauren Hadley**

Safeguarding Team, West Midlands Ambulance Service Foundation Trust







## 2015-18 BUSINESS PLAN – planning for year 3

### Introduction

A review of the 17/18 Business Plan has been undertaken and additional recommendations have been made with regard to the actions arising from the board development day. This document now forms the basis for the 18/19 Business Plan.

The Business Plan is an addendum to the Strategic Plan 2015-18 and forms the foundation for the work of the sub groups to deliver the outcomes. The Strategic Plan will require a refresh.

This Business Plan is developed to enable the Safeguarding adult board to carry out its functions as set out in legislation and guidance. This includes ensuring the protection of adults in the following circumstances:

- (a) Has needs for care and support (whether or not the authority is meeting any of those needs),
- (b) Is experiencing, or is at risk of, abuse or neglect, and
- (c) As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

The way in which an SAB must seek to achieve its objective is by coordinating and ensuring the effectiveness of what each of its members does to safeguard vulnerable adults. The HSAB achieves this through scrutiny, challenge, learning and support. The key outcomes and actions in this plan are designed to help us demonstrate **Strong Partnership**, which is an essential part of ensuring strong and effective working together to safeguard vulnerable adults.

| <b>Partnership working</b>  |   |                 |
|---|---|-----------------|
| <b>To develop relationships across agencies that deliver positive changes to safeguarding</b>               |   |                 |
| <b>Business plan 18/19</b>  | <b>Actions</b>  | <b>Progress</b> |
| Define and understand involvement from voluntary sector   | Clarify representation of voluntary sector through the membership and work of the HSAB  |                 |
| Develop a more qualitative approach to performance monitoring (Outcome from board development day March 17) | Establishment of multi-agency case audit process against boards priority areas.<br>For the board to be clear about what we need to know to be able to be assured about progress in priority areas and develop multi agency performance information against these priorities |                 |
| <b>Prevention and protection</b>  |   |                 |
| <b>To ensure that Herefordshire residents can recognise safeguarding concerns and know what to do</b>       |   |                 |
| <b>Business plan 18/19</b>  | <b>Action</b>   | <b>Progress</b> |
| Service user involvement  | Continue to develop the work already commended of service user feedback through Healthwatch   |                 |
| Monitor Prevention Work plan  | The HSAB to receive scheduled updates and reports on the progress of the prevention work plan   |                 |

| <b>Communications and engagement</b>   |  |                 |
|--|--|-----------------|
| <b>To deliver the messages from the board and recognise the voice of those we safeguard</b>  |  |                 |
| <b>Business plan 18/19</b>   | <b>Action</b>  | <b>Progress</b> |
| Raise awareness of safeguarding, MCA and DoLS across councils, communities and smaller organisations   | To be included in sub group work plans and reported to the executive on work and actions taken and a view on impact. Business unit to retain a log of communications, and link in to One Herefordshire |                 |
| Develop effective arrangements for delivering messages to and from the board   | Review terms of reference of practitioner forums to maximise this process as an approach to messages from front line practice.   |                 |
| <b>Operational effectiveness</b>   |  |                 |
| <b>To ensure safeguarding knowledge, processes, systems and structures are embedded across all agencies</b>  |  |                 |
| <b>Business plan 18/19</b>   | <b>Action</b>  | <b>Progress</b> |
| <p>Single agency assurance reporting to Exec”</p> <p>Suggested themes:</p> <ul style="list-style-type: none"> <li>❖ Assurance of right referral for right reason</li> <li>❖ Activity against prevention agenda</li> <li>❖ Board and sub group contributions</li> <li>❖ Compliance with care act / MCA / DoLS / competency</li> </ul> | Assurance reporting from single agency to be scheduled in to the business cycle of HSAB.   |                 |

|   |  |  |
|---|--|--|
| framework   |  |  |
| Messages from the board are disseminated  | Partners need to provide evidence, including through assurance reporting that the relevant messages identified through the board are being disseminated in their agencies.   |  |
| Ensure learnings from audits and reviews are shared across the partnership                    | Develop approaches to achieve timely dissemination of messages from reviews and audits, with single agency partners taking responsibility and contributing to this. Details to be included in sub group work plans |  |
| Consideration of ADASS “Making safeguarding personal for safeguarding adult’s boards” report. |  |  |
| Consideration of ADASS Making safeguarding personal for individual agencies report.           | Policy and Procedure sub group to lead and guide single agencies development of MSP guidance in their organisations  |  |
| Monitoring of Board MSP action plan   | MSP action plan to be scheduled in to business cycle of HSAB executive for regular update on progress and any risks.   |  |
| Develop self-assessment for partner agencies based on Competency Framework                    |  |  |
| Examine effectiveness of sub groups   | The sub groups to report to the executive group on the commitment of partners to the working of the sub groups, progress on core business and priorities of the HSAB.  |  |

|   |  |  |
|---|--|--|
|   | The Executive will lead on recommendations for improvements of the effectiveness of the sub groups.  |  |
| Effectiveness of the broader safeguarding system<br>Suggested themes:<br>❖ Provision of advocacy and access to it<br>❖ Addaction<br>(identified from development day) | Executive to recommend for the board how these areas should be monitored, for example for inclusion in case auditing and assurance reporting |  |
| Increase HSAB engagement with regional and national work and developments<br>(identified from development day)  | The board to identify specific areas to highlight and evidence.  |  |







# Herefordshire Safeguarding Children Board



Annual Report - 1 April 2016 – 31 March 2017

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# 1. Foreword from the Independent Chair

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I am pleased to introduce this annual report for Herefordshire Safeguarding Children Board covering the year 2016-17, at the end of my second full year as its independent Chair. This is a public report which sets out the work of the Board and its view of the effectiveness of safeguarding arrangements across the county. The report aims to give everyone who lives and works in Herefordshire a sense of how well local services and people in the community are working together to keep children safe. The report is also intended to inform the decisions made by those responsible for leading, commissioning and funding local services.

As in previous years, many of the organisations which contribute to the Board's work have continued to face significant financial pressures, which have entailed difficult decisions about allocation of resources. Where it was felt to be necessary, the Board has challenged decisions made by agencies at both strategic and operational levels. Despite the pressures, the Board's partners have maintained a focus on developing arrangements and services which enable a quicker, earlier response to children and families who may need additional help. This is an area that will continue to be promoted in the year to come, with the aim of supporting families more effectively at an early stage and reducing the need for statutory intervention as difficulties become more entrenched.

Throughout the year, agencies have continued to demonstrate their commitment to safeguarding children through contributing to the multi-agency work of the Board, taking part in multi-agency auditing and challenge activities, and sharing their own data and self-assessments. The Board has also worked in support of the vision of the Children and Young People's Partnership, focusing attention on areas which present the greatest risk to Herefordshire's children - child sexual exploitation and going missing, neglect and domestic abuse – and working more closely with other multi-agency partnerships to ensure that the most vulnerable individuals and families are identified, supported and safeguarded.

Of particular note has been the work to address the apparently high rates of children in Herefordshire who are the subject of child protection plans. At the

beginning of the year, rates in Herefordshire were higher than would be expected, given the socio-economic make-up of the county, and in comparison with national and statistical neighbours. The report sets out the steps the Board has taken to address this, which have been successful in achieving a reduction in child protection rates whilst ensuring that families are supported and children's safety and welfare safeguarded.

This work will continue during 2017-18, with an increasing emphasis on promoting consistent, accessible and effective early help services. This will involve working with partners both within the HSCB context, across Herefordshire, and more widely across the region. The year will also see attention paid to putting in place future arrangements for safeguarding children in response to the changed legislative context that has been introduced by the Children and Social Work Act 2017, which gives greater flexibility locally whilst increasing accountability for NHS and police partners alongside the local authority.

The Board has published one serious case review (SCR) during the year covered by this report, which focused on neglect and has informed the Board's actions in the coming year to support the workforce in developing skills and competence in this difficult and challenging area of work. The review also brought increased focus on disabled children, who must always be kept in mind because of their additional vulnerabilities. This will continue in the coming year. In addition, individual cases and groups of cases have been reviewed to identify both good practice and areas for improvement. We will continue to monitor the impact of the learning from these cases on the quality of local practice.

Finally, as ever, there are staff and volunteers who day to day demonstrate their commitment to children and families through their work and dedication. We thank them all for everything they do to safeguarding children and promote their wellbeing.

**Sally Halls**  
**Independent Chair**  
**Herefordshire Safeguarding Children Board**



## 2. About this report

Chapter 3, paragraph 12 of *Working Together to Safeguard Children* (2015), requires the Chair of the Local Safeguarding Children Board to publish an annual report on the effectiveness of child safeguarding and promoting the welfare of children in the local area.

The annual report is an account of the effectiveness of the LSCB and this report is published in relation to the financial year 2016-2017. It is submitted to the Chief Executive, Leader of the Council, the local Police and Crime Commissioner and the chair of the Health and Well-being Board.

The annual report should provide a rigorous and transparent assessment of performance and effectiveness of local services. It identifies areas for improvement, and the actions being taken to address them. The report includes lessons learned from reviews undertaken during the year and how the LSCB has used the learning to impact on practice.

The report also lists the financial contribution of each partner agency and provides a budget breakdown on spending.

Finally, the report outlines evidence based priorities for 2017-2018.

Authors: Sally Halls – HSCB Independent Chair & Steve Eccleston, Business Unit Manager

This report can be downloaded from the HSCB website at:  
[www.herefordshiresafeguardingchildrenboard.org.uk](http://www.herefordshiresafeguardingchildrenboard.org.uk)

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## 3. Executive Summary

This report sets out how Herefordshire Safeguarding Children Board has worked to meet its statutory objectives during 2016/2017, which are to co-ordinate local work to safeguard and promote the welfare of children and young people, and to ensure the effectiveness of that work. The report gives detail on the priority areas addressed by the Board during this period, as well as the data and reporting provided by partner agencies regarding their performance in working together to safeguard children and young people in Herefordshire. The report also sets out how effectively the Board identifies areas for improvement, including learning from case reviews and audits, and details the Board's planned priority areas for 2017-18.



### Progress on Priorities 2016-18

Herefordshire Safeguarding Children Board's (HSCB) set the following priority areas for 2016/18.

- 1) Identification, prevention, and response to Child Sexual Exploitation/children who go missing.
- 2) The child's journey through the child protection process ensures effective planning and intervention to improve the care, safety and wellbeing of children and reduce/eradicate actual or the risk of significant harm.
- 3) Identification and response to childhood neglect.
- 4) The early help services effectively identify needs and concerns relating to children and families, and services address these needs through the effective planning and interventions to enable families to function effectively and children's needs are met and they are supported to achieve their full potential.



## Priority 1: Identification, prevention, and response to Child Sexual Exploitation/ children who go missing.

During 2016/17 the Child Sexual Exploitation and Missing Children sub-group has reviewed the Board's strategy for tackling CSE in Herefordshire, and set a new work plan to build on the progress made during previous years. It has also reviewed the pathway for reporting CSE where someone working with a child has concerns, and the risk assessment and management processes to be used when such reports have been received.

On 27 April 2016, HSCB held a conference which focussed on the theme of Child Sexual Exploitation and covered a range of areas within this through a number of different workshops. This conference was attended by 110 multi-agency professionals and was very well received. The Board has continued to support the role out of awareness training for local taxi drivers, and has reintroduced classroom based multi-agency CSE training.

As a result of the Board's activities, there is a greater awareness across Herefordshire of CSE. Whilst numbers of children reported missing from home and school has remained relatively constant, there was a decrease in reports from placement providers of children missing from care, with 96 reported missing between April and June and only 52 reported between July and September and this downward trend continued. This may be attributable to the targeted work of the police care home team in working with care homes in regarding to the missing person protocol.

CSE and Missing Children will remain a priority for the Board in 2017/19, and we will continue to work to ensure that:

- The various CSE pathway documents and guidance for professionals in relation to dealing with CSE and missing children are well understood by practitioners and embedded in practice;
- The importance of recognising and reporting concerns in relation to CSE is well understood by local hotels and other venues;
- The CSE Operational Group is effective in identifying and responding to information on emerging patterns of risk.



## Priority 2: The child's journey through the child protection process ensures effective planning and intervention to improve the care, safety and wellbeing of children and reduce/eradicate actual or the risk of significant harm.

During 2016 Board members attended Initial Child Protection Conferences and Review Child Protection Conferences as observers, and gave feedback about the strengths and weaknesses they observed. This has led to a number of changes and improvements, including revised guidance to child protection conference chairs.

The Board's Quality Assurance subgroup conducted an audit of cases relating to children who were living in homes where domestic abuse was present. This replicated the approach of the Joint Area Team Inspection (JTAI) audits being carried out in relation to this theme by Ofsted, Her Majesty's Inspectorate of Constabulary and the Care Quality Commission.

An extensive review of the multi-agency safeguarding hub (MASH) commissioned by HSCB led to a number of changes being made through 2016/17 to improve the functioning of the MASH and so ensure that children and young people who are referred receive the appropriate service to meet their needs.

One result of these activities has been a sustained reduction in the number of children subject of child protection plans. This reduction has meant that professionals have more time to respond effectively to those children who are subject of a plan while other families are supported through the children in need process. Further checking has assured the Board that this reduction has been achieved safely, and without children being put at risk of significant harm.

During 2017/19 the Board will be working to ensure that:

- Learning from the Child Protection Conference observations is embedded, through further Board member attendance at these meetings;
- Board procedures are in line with regional arrangements and statutory guidance so children receive a consistent response;
- We use multi-agency performance data well to monitor the effectiveness of local safeguarding practice and the quality of child protection plans;
- We use feedback from children and young people who have experienced the child protection journey to understand the effectiveness of the local safeguarding system;
- Learning from Serious Case Reviews and Practice Learning Reviews is used appropriately to improve the journey of the child through the child protection process.



### Priority 3: Identification and response to childhood neglect.

During 2016/17 the Board completed the 'Family HJ' Serious Case Review, which is available to view on our website. This made a number of recommendations, and reinforced the importance of the identification and response to childhood neglect being a priority for the Board. The Board has been working hard to deliver on the recommendations; for example, it has developed and agreed a comprehensive strategy to tackle childhood neglect in Herefordshire, which sets out the aims and objectives of the Board in relation to the prevention, identification and response to childhood neglect.

To support our understanding of the effectiveness of the response to childhood neglect in Herefordshire, the Board has held a focus group attended by professionals from a broad range of partner agencies. Feedback from this focus group has been used to help develop our plan to improve services to those who are at risk of, or being neglected.

The Serious Case Review and feedback from practitioners has highlighted the need to focus on the response to childhood neglect, embed the neglect strategy, introduce a common toolkit for identifying and assessing levels of neglect, and provide multi-agency training which addresses the identified themes. This has led to a series of roadshows being held for practitioners to raise the awareness of childhood neglect, how to recognise it and when and how to report it.

Specific learning came from the 'Family HJ' serious case review in relation to children with disabilities. The Board has learned that there is a need to improve the knowledge of disability amongst practitioners, including how current procedures and good practice relate to situations involving children with disabilities, to review the appropriateness of the current 'Levels of Need' guidance to assessing children with disabilities, and to ensure that disagreements about cases can quickly be resolved using the 'resolution of professional disagreements' procedure.



Tackling childhood neglect is the main priority for the Board in 2017/19, and we intend to achieve this by:

- Developing a costed plan for introducing the Graded Care Profile 2 (GCP2) in Herefordshire;
- Identifying the agreed number of multi-agency trainers and then delivering training in the use of GCP2;
- Ensuring that the forthcoming section 11 audits assesses the availability, quality and impact of single agency childhood neglect training within the partner agencies. This will be supported by the Board providing core training materials on neglect for use within partner agencies;
- The Board will promote the importance of this work, which will include a conference for practitioners on childhood neglect;
- The Board will be challenging agencies where practice relating to the capturing of the views of children who are at risk of or suffering from neglect needs improvement;

In addition, in recognition of their particular vulnerabilities, the Board will be establishing a specific task and finish group to examine how we can be assured of the effectiveness of the safeguarding of children with disabilities within Herefordshire, and how it can support improvements where necessary.



**Priority 4: The early help services effectively identify needs and concerns relating to children and families, and services address these needs through effective planning and interventions to enable families to function effectively and children's needs are met and they are supported to achieve their full potential.**

During 2016/17 the Board has reviewed its Levels of Need guidance used by practitioners to include a greater emphasis on early help. The Board also surveyed practitioners to help understand how well the Levels of Need were understood and being used in decision making.

The Board has continued to support and challenge the development of early help services within Herefordshire, receiving a report from the Council on the development of the early help response.

During the year, the Board's Quality Assurance subgroup completed a multi-agency audit of early help cases, and the learning from that audit has been used to develop learning sessions for practitioners.

As a result of its work, the Board now understands better the use of the Levels of Need by practitioners when they make a referral, and the standards of practice across the partnership. We also now know that we need to raise the awareness of the Levels of Need document for practitioners within certain areas, for example within the Police, and to address the areas for development highlighted through the audit.

Multi-agency awareness sessions were provided in order to raise the understanding of practitioners in Herefordshire of the Traveller community, with the intention of improving outcomes for children and young people from this community.

Early help will remain as a priority for the Board during 2017/19. As such, the Board will work to ensure that children and their families receive effective help at the right time which promotes their wellbeing by:

- Ensuring that Board procedures address the impact 'hidden harm' has on children and young people, and those procedures support the early help strategy;
- Assessing the impact of threshold decisions on those children who are not stepped up to higher levels of intervention;
- Evaluating the availability and effectiveness of early help support, particularly in relation to children living with neglect and domestic abuse, and children with disabilities;
- Ensuring the Board's training products promote understanding of the early help offer with practitioners;
- Securing feedback from children, young people and their parents/carers about the experience of accessing and receiving early help.



## How the HSCB has carried out its statutory functions

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### a. Policies, procedures, practice guidance updates

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The Herefordshire Safeguarding Children Board (HSCB) Policy and Procedures subgroup leads this work, and has continued to grow through 2016/17, with strong representation from partner agencies.

The transformation project to introduce a collaborative West Midlands Local Safeguarding Children Board multi-agency policies and procedures resource has now been completed with the new web based facility having gone 'live' on 31 March 2017.

This has seen the joint West Mercia arrangement for developing and hosting safeguarding procedures replaced by a wider West Midlands consortium of nine boards. The HSCB Policy and Procedures subgroup has contributed to this work by reviewing a number of the procedures which are now shared regionally.

### b. Training

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During 2016/17 the Workforce Development subgroup of the Board has developed evaluation procedures to assure the quality of safeguarding training being delivered to practitioners. That process has been implemented across all training delivered, in order to assist in evaluating the impact of training on service delivery and outcomes for children.

A training pool has been created to support delivery of specialist training which supports the Board priorities.

A Joint Workforce Development Strategy has been developed that includes a competency framework to be used to support the development of a skilled and competent workforce across Herefordshire. This includes the creation of a process to validate the training.

The Board has worked to create opportunities to hear directly from practitioners. We have been successful in increasing the numbers of practitioners attending the regular Practitioner Forums, who come from an increasing variety of agencies. A Voice of the Practitioner report process is now in place to provide feedback to the Board.

In 2017/18, the Board will be looking to improve how we share and embed learning from audits and Serious Case and Learning Reviews amongst our practitioners, and we will be working to develop further our training pool of staff in support of this.

The administration of the on-line training provision has returned to the Business Unit in order to make the Board more cost effective.

The Board now needs to develop the support from subject matter experts and subgroups to develop and deliver training events to meet requirements of key priorities and business plan objectives. These would then become part of the HSCB training programme.

### c. The safety and welfare of children who are privately fostered

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A child under 16 (under 18 if disabled) who is cared for by someone who is not their parent or a 'close relative' is deemed to be privately fostered. Private fostering is an arrangement made between a parent and a carer for 28 days or more. The council has a legal duty to make sure that all private fostering arrangements are safe and appropriate for the child. HSCB receives an annual report about private fostering in Herefordshire. In 2016/17 the Local Authority was notified of four such private fostering arrangements. Although this is a slight increase on last year's figure, the number does still appear low, and demonstrates the need for awareness raising to continue in this area.

### d. Case reviews

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During 2016/17 one Serious Case Review has been concluded and published, this having been initiated in 2015/16. It concerned a family with multiple children, some with significant disabilities. Learning from that review continues to be rolled out to practitioners, and work continues to ensure all of the recommendations from the report are completed. A Practice Learning Review (PLR) was also completed during 2016/17. This is a new type of review for Herefordshire, intended for cases that do not meet the criteria for a Serious Case Review, but where there is significant multi-agency learning to be gained.

## e. The Child Death Overview Panel (CDOP)

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A total of 11 deaths were recorded within the review period April 2016- March 2017, three of which are still awaiting completion of review. There were 14 deaths signed off at the CDOP meetings within this review period, and these are the focus of the Annual Return to the Department for Education for Herefordshire.

The Child Death Overview Panel (CDOP) has continued to function as an effective subgroup of the Board during 2016/17. Both the consideration of all referrals to the panel, and the annual return to the Department of Education have been timely, and referrals to the panel by local paediatricians continue to be of high quality. Where the completion of referral forms has been identified as being in need of improvement, training has been offered to those agencies. All recommendations from the 2015/16 CDOP report have been implemented.

## f. Communications

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The Board shares a Joint Communications subgroup with the Safeguarding Adult Board and Community Safety Partnership. The purpose of this subgroup is to ensure that all the communications across the partnerships about safeguarding are as coordinated and effective as possible. The subgroup is aware of the Boards priority areas and looks to ensure these are captured in communications. Importantly the group also share what each agency is doing on communications about particular topics so we can be more informed and coordinated about messages given to partners and the community. To develop this co-ordination further, the subgroup is now working closely with the One Herefordshire Strategic Communication and Engagement Group, which is a forum led by the Herefordshire Clinical Commissioning Group.

## g. Allegations concerning persons who work with children

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HSCB has in place safeguarding procedures which include comprehensive procedures to manage allegations against adults who are employed to work with children or who work with children in a voluntary capacity. These procedures are in line with other key statutory documents including the Department of Education statutory guidance, Keeping Children Safe in Education (2016).

The Local Authority Designated Office (LADO) is responsible for the management and oversight of all investigations in to allegations against those working with children within Herefordshire. The LADO produces an annual report which is scrutinised by HSCB.

During 2016/17, 140 allegations against professionals were managed by the LADO, compared to 117 in 2015/16. The average for the seven year period is 137, with 140 – 159 being the usual range for Herefordshire.

Working Together 2015 sets the expectation that 80% of cases should be resolved within one month of referral, 90% within three months and all but the most exceptional cases within twelve months (measured as number of days from referral to case closure). The data for 2016/17 shows that 73% of cases have been resolved within one month of referral, and 90% of cases have been resolve within three months of referral. This represents a significant improvement on 2015/16 performance.



## Effectiveness of agency safeguarding arrangements in Herefordshire

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The Board has continued to monitor a range of performance information and carry out quality assurance activities to measure the effectiveness of local services. This work is set out in the Board's Learning and Improvement Framework and is primarily coordinated through the Quality Assurance and Performance (QA) subgroup. Practitioners and first line managers have been actively involved in the multi-agency case audits and this allows for a much richer discussion and exchange of views and understanding which leads to better learning.

### Section 11 audit

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The HSCB carries out a full Section 11 audit every two years. The Board conducted a full Section 11 audit in 2015/16, and the next such audit is due in 2017/18. There has been no full audit conducted this year; however a panel of members of the Herefordshire Safeguarding Children Board invited partners to present on how they had addressed areas for development identified within their own Section 11 audits in 2015/16, and the Board has also during this period been actively contributing to the development of a Regional Section 11 audit tool, to be used in the coming year.

### Development of HSCB and its effectiveness 2016-17

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HSCB carries out its work primarily through its subgroups, supplemented by task and finish groups as required, and through scrutiny and challenge at Board meetings.

The Board also works with other multi-agency partnerships across Herefordshire to both scrutinise and challenge their activities and to pursue joint objectives. Overall engagement by partners in the work of the HSCB has continued to be positive throughout 2016-17. The Board also continues to work closely with the Herefordshire Health and Wellbeing Board, Children and Young People's Partnership, Safeguarding Adult Board and Community Safety Partnership in recognition of the wide range of factors that can impact on the safety and wellbeing of children and young people.



## Illustrations of HSCB challenge and impact

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Throughout the report, there are details of the work of all partners in safeguarding children, and the Board's function in seeking assurance that partners are working effectively together. Examples of this activity are summarised below:

### Challenge

Report of very low numbers of young people in 'staying put' placement at age 18+ in Herefordshire.

A number of agencies were written to by the Chair challenging their lack of regular attendance at Board meetings.

Continued difficulty in obtaining Form B responses to child deaths in a timely fashion from several agencies.

Challenge to Addaction on lack of provision and suitable premises for young people, and safeguarding of children/young people in care of service users.

### Impact

Reassurance report received from Director of Children's Services clarifying the number of young people using such arrangements and demonstrating appropriate provision and take-up within the county, so ensuring young people have the opportunity to choose to 'stay put' should they wish to do so.

Regular attendance now secured from those agencies. This ensures the Board makes decisions with full information available, so ensuring those decisions are likely to have the best possible impact on safeguarding children and young people.

The SUDIC paediatrician and the Chair of CDOP have written and spoken to professionals. The CDOP has considered the learning from this and have recommended the following:

- Professionals are made aware of their role through the development of a pathway which is on the LSCB website;
- A good practice guide and sample is posted on the web to assist with understanding;
- The Director of Children Services, as the accountable officer, has been alerted to take the appropriate action;
- A communication item on the CDOP agenda to agree dissemination of learning, with responsibility for this to the HSCB Communications Subgroup.

In securing more timely submission of information, opportunities to prevent SUDIC can be taken soonest, so improving the safeguarding of children.

Children and young people who are living with parents with drug or alcohol issues, or have such issues of their own, are correctly identified as being more likely to need early help as a result, and where necessary those children and young people are given access to that help at the correct level and by the most appropriate agencies.

## Challenge

## Impact

Improving the response to victims of 'peer on peer' abuse.

HSCB has taken the lead for reviewing the regional 'Children who abuse others' procedure, ensuring the new procedure is developed with input from all relevant agencies. This will ensure children and young people who are victims of abuse by their peers are better protected through a more robust response by professionals.

In relation to CSE/Missing Children, members of the Executive questioned the availability of guidance for Risk Management meetings. The executive also explored whether the Risk Management meetings are subject to quality assurance.

Children's Social Care now have a Risk Management Practice Guidance, along with Risk Management Meeting Guidance and Agenda, which now sit within the suite of CSE procedures. This ensures children and young people who may be at risk of CSE are correctly identified and interventions that will most effectively protect them are agreed by partners, and implemented.

Following identification of high numbers of children subject of child protection plans, the Board developed and promoted multi-agency guidance on applying the significant harm threshold, along with levels of need guidance.

This supported partner agencies and IRO's in focusing on those children, who most needed support through safeguarding, and improving the services and outcomes for children and young people subject to a child protection plan, while reducing the numbers of children subject to child protection plans.

Findings from a Serious Case review led the HSCB to request the Early Help services and other safeguarding process to consider the whole family approach in their planning and service delivery.

Herefordshire's Early Help strategy that has been endorsed by the HSCB, Health and Well Being Board and Children and Young Peoples Partnership reinforces the "whole family approach".

Through its work the HSCB became aware of issues in specific cases and raised these with relevant partners.

Opportunities were identified to provide further help to two young people in a family that made a significant difference.

From the experience of a case involving travelling families the board developed awareness sessions for practitioners in order to raise understanding of the experiences of travelling families.

Findings from a practice learning review impacted in a number of ways in relation to multi agency working and services for children and families

Improved inter agency communication in the MASH.

The Youth Offending Service developed in house resource for direct work in youth justice cases.

## Conclusion and priorities for 2017/19

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Evidence from the Board's quality assurance activities indicates that services to safeguard children in Herefordshire and promote their wellbeing continue to improve, but need to become more consistently good.

During 2016/17 the Board has been very active in promoting the effectiveness of child safeguarding arrangements in Herefordshire through the work of Board members and its subgroups. It has also achieved notable success in influencing the work of other partnership forums in the county towards giving greater focus to safeguarding children in the county. Through engagement with the Herefordshire Community Safety Partnership that forum now has a priority for 2017 – 2020 of reducing sexual offending against children, whilst the Herefordshire Health and Wellbeing Board is now prioritising the dental health of children.

As a result of the work undertaken by the Board during 2016/17, we now have a much stronger understanding of the profile of CSE in Herefordshire. We have up to date tools and pathways to deal with reports of CSE, and have improved the quality of awareness and training to multi-agency partners on how to recognise and address the threat of CSE. In the coming year the Board will be focusing on assuring itself of the effectiveness of risk management planning in relation to individual children and young people at risk of CSE, and the support services available to victims of CSE. This will be achieved in a number of ways, including the delivery of the revised strategy and action plan, with audit activity to check that this has the impact intended on services. The Board also recognises that there is a relatively high rate of recording of sexual crimes against children in Herefordshire, and we need to understand why that is and how such offending can be better prevented. The Board will be supporting the Herefordshire Community Safety Partnership in achieving this.

In addition, the Board has had the opportunity to consider the extensive research that was commissioned from the Local Authority's Strategic Intelligence Team in relation to Child Sexual Exploitation and sexual offending against children and young people, and has as a result updated its priorities to reflect this. The priorities have also been simplified to ensure they are clear and easily understood.

As a result of the work of partners and challenges raised within the Board, the HSCB recognises that the collective response to 'peer on peer' abuse requires a greater focus and this will be provided through 2017/18.

A sustained reduction in the number of children subject of child protection plans has been achieved. This reduction has meant that professionals have more time to respond effectively to those children who are subject of a plan while other families are supported through the children in need process. Further checking has assured the Board that this reduction has been achieved safely, and without children being put at risk of significant harm.

Board members have made an active contribution to further developing the quality of child protection conferences in Herefordshire, and work will continue to ensure those developments are well embedded. Audit work has shown that within the child protection system there is high quality direct work taking place which clearly leads to improved outcomes for children and their families, including the child's voice being clearly evident, and the demonstration of good communication across agencies. There is strong evidence of statutory child protection meetings being well attended and resulting responses and actions being timely. That said, the Board remains cognisant of the need to ensure continued focus on the quality of supervision of practitioners and continuity of staff within agencies as a vital part of effective safeguarding procedures.

In reviewing progress against the 2016/18 priorities, the Board recognised that greater impetus is now required to improve the response to tackling childhood neglect, and this is the key priority for the coming 12 months. Although progress has been made during 2016/17, it is clear that real and sustainable change across the partnership in how neglect is identified and responded to must be achieved. As such the Board will be investing considerable resources in introducing new ways of working, and providing practitioners with the skills to take full advantage of those.

In addition, in recognition of their particular vulnerabilities, the Board will be paying particular attention to assuring the effectiveness of the arrangements to safeguard children with disabilities within Herefordshire, and supporting improvements where necessary.

The Board has continued to work towards ensuring that the Levels of Need supports the delivery of the Early Help Strategy within Herefordshire. The coming year will see the further development of early help services, and it is important that the Board supports that work and the work of the Children and Young Person's Partnership in ensuring that the workforce is sufficiently prepared for the shift of emphasis towards early help.

Reflecting on the achievements of the Board through 2016-2017, and using a range of sources of information which have included inspections, self-assessments, learning from reviews and consultation with our partners in Herefordshire highlighting areas where development is required, the Board has set five priorities for 2017 – 2019:

- Priority 1**  
Neglect
- Priority 2**  
Child Sexual Abuse/ Exploitation and children who go missing
- Priority 3**  
Safeguarding vulnerable children
- Priority 4**  
Early Help
- Priority 5**  
Strong leadership, strong partnership

It is the intention of the Board during the coming year to concentrate on these and other areas where we can make a real difference to the safety and development of children and young people in Herefordshire by promoting and ensuring efficient and effective practice.

## 4. The Local Context

The latest (mid-2015) estimate of Herefordshire's resident population is 188100, which represents an increase of just 900 on the year before.

Herefordshire's population is scattered right across its 2,180 square kilometres, of which 95% of the land area is 'rural'. Just under a third (60,400 people) live in Hereford city and just over a fifth (40,500) in one of the five market towns, but over two-fifths (79,400) live in areas classified as 'rural village and dispersed'.

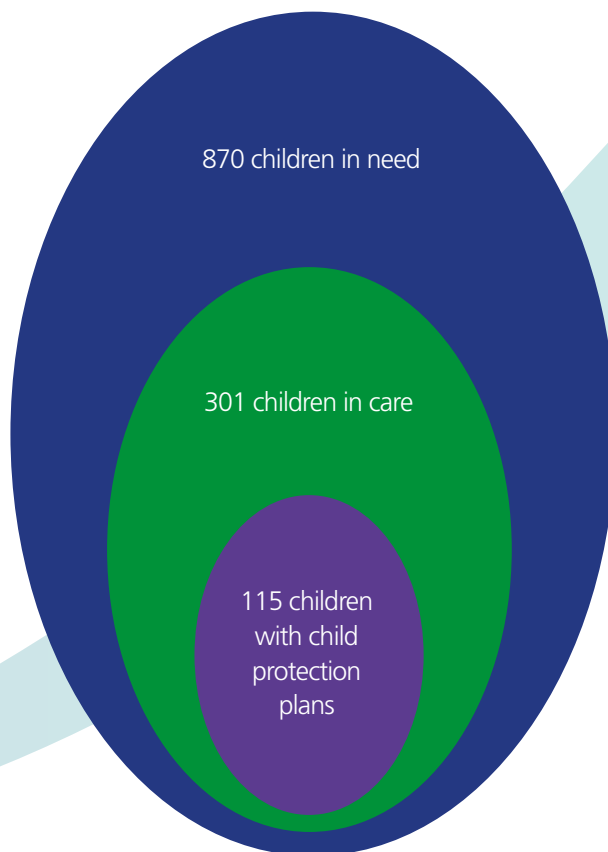
There are 39,900 (21%) children and young people (aged 0 to 19) living in Herefordshire, of whom:

- 9,900 (5%) are aged under five
- 21,900 (12%) are aged 5-15 years
- 8,100 (5%) are aged 16-19 years and

There are also

- 11,300 (6%) aged 20-25 years old.

Below is an illustration of the numbers of children assessed as in need, numbers of children with a child protection plan and numbers of children in the care of the Local Authority as at 31st March 2017.





# 5. Progress on our Priorities for 2016-18

Herefordshire Safeguarding Children Board (HSCB) set the following priority areas for 2016/18.

## Priority 1

Identification, prevention and response to Child Sexual Exploitation/ children who go missing.

## Priority 2

The child's journey through the child protection process ensures effective planning and intervention to improve the care, safety and wellbeing of children and reduce/eradicate actual or the risk of significant harm.

## Priority 3

Identification and response to childhood neglect.

## Priority 4

The early help services effectively identify needs and concerns relating to children and families, and services address these needs through effective planning and interventions to enable families to function effectively and children's needs are met and they are supported to achieve their full potential.

## Priority 1: To improve the recognition and response to child sexual exploitation (CSE) and missing children and young people.

### What we have done

The HSCB's CSE and Missing subgroup oversees and challenges the work of partners to recognise and respond effectively to this issue. The CSE Strategy and Delivery Plan was reviewed, updated and was signed off by the HSCB in January 2017. It has been informed by the existing and developing regional and local problem profiles and has drawn on evidence about effective practice from national and local research, policy and guidance. It has also been developed in line with the Shropshire CSE Strategy to ensure there is as much continuity for West Mercia-wide agencies as possible, and shared responses can be developed where needed.

The CSE dataset has been regularly updated and is monitored by the CSE and Missing subgroup and the Board. Measures have been adapted to incorporate data which reflects the prevalence and preventative measures taken to disrupt, and provide assurance to the HSCB. The dataset will be supplemented by targeted auditing to assess awareness of and responses to CSE risks and harm.

The CSE pre-checklist to help partners identify CSE concerns and refer has been updated and improved and a Risk Assessment Tool and Risk Management Practice Guidance have also been produced.

HSCB took part in the NWG #Thunderclap initiative during CSE Awareness Day in March 2017. HSCB also arranged for an awareness raising screensaver to be rolled out throughout Herefordshire Council, and a communications pack was sent out to all Board Members to disseminate throughout their agencies.

## CSE Conference

On 27 April 2016, HSCB held a conference which focussed on the theme of Child Sexual Exploitation and covered a range of areas within this through a number of different workshops. The conference was held at The Hereford Academy, and HSCB would like to convey their thanks to them for their hospitality and their part in making the event a success.

A total of 110 multi-agency professionals attended the conference, which was well received. The keynote speakers for the conference were Dr Peter Unwin, who spoke regarding perceptions of CSE in a rural county, and Lorin LaFave, who told her own personal story of how her son, Breck Bednar, was unwittingly groomed and lured to his death by someone he met online.



Lorin LaFave

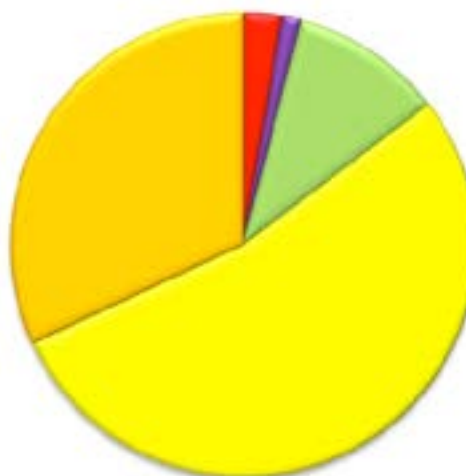
The delegates had the opportunity to attend two workshops, which focused on areas relating to CSE including:

- Understanding Local Pathways
- Sexting
- Child Trafficking
- Understanding Consent
- Toxic Bedfellows

The aim of the conference was to increase practitioner's ability to identify CSE and improve their knowledge to help and work with children and their families.

The impact of the conference was evident in a number of areas and course evaluation comments. Delegates said they found the workshops gave them a better understanding of each area of work which they could then include in their own practice and also commented on the powerful impact on them of the presentation from the key note speaker, Lorin LaFave. Her presentation was described as "heart-wrenching and informative" by delegates. Delegates were asked to rate whether their knowledge of CSE had improved after attending the conference with 1= not at all and 5= greatly improved. 53% marked the conference 5, and a further 32% marking the conference 4. Practitioners also highlighted the value of the learning from the workshops they attended.

**After attending this conference, do you feel that your knowledge of CSE has improved?**



- Not completed
- 1 Not at all
- 2
- 3
- 4
- 5 Greatly improved

As well as the CSE conference, the HSCB Business Unit joined colleagues from a range of agencies for an 'Engaging Communities' event in High Town, Hereford in July 2016.

The aim of the day for the Safeguarding Children Board Business Unit staff was to raise public awareness of Child Sexual Exploitation and Private Fostering. The stand attracted the attention of a range of members of the public who were given verbal advice and signs and indicators leaflets.



The Mayor of Hereford Councillor Jim Kenyon is pictured above visiting the Herefordshire Safeguarding Boards stand at the event, alongside Bill Joyce, Interim Manager of the Safeguarding Boards Business Unit.

HSCB's work with licensing continued throughout 2016/17. The HSCB arranged for Safeguarding questions to be added to the "Conditions Test", which is a compulsory test that every taxi driver has to pass before they are granted their licence.

HSCB also commissioned an awareness raising sticker, which is displayed within every licensed Herefordshire taxi.



CSE awareness training for taxi drivers regularly took place, the sessions were well attended and included the two major taxi firms within Herefordshire.

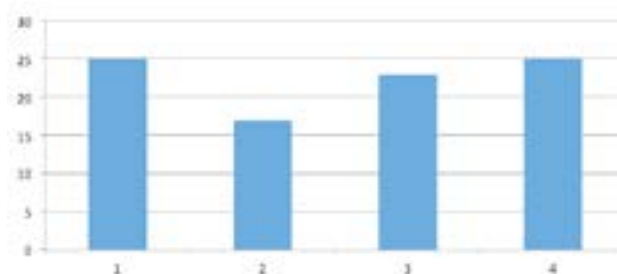
Over 160 taxi drivers have now been trained, and all have been issued with a sticker for the back of their identity badge, which provides them with the number to call for the MASH Team, if they have any safeguarding concerns regarding a young passenger, and the Adult Referral Team (ART) if they have safeguarding concerns regarding an adult.

Discussions are in place for the next tranche of training, which will include hoteliers and licensed premises. The training was delivered by Young Solutions, who were commissioned by West Mercia Police. The HSCB Business Unit's input into arranging and promoting the training has been put forward as an effective process and a beacon of good practice within Young Solutions.

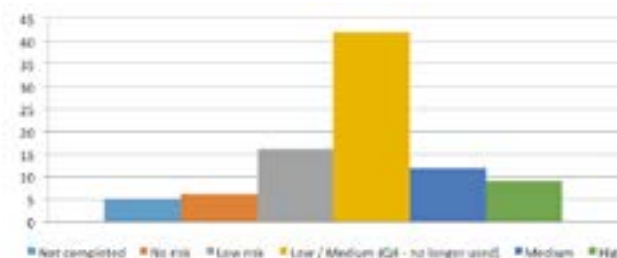
Our plan for the year 2015-16 set out some key areas where we wanted to make a difference in raising awareness and responding to concerns regarding children and young people at risk through CSE.

In 2016/17 90 risk assessment tools were completed by staff in the MASH on referrals concerning possible CSE and of these 58 were deemed low or medium risk and 9 were assessed as high risk.

### CSE assessments undertaken per quarter



### Outcome of CSE assessments

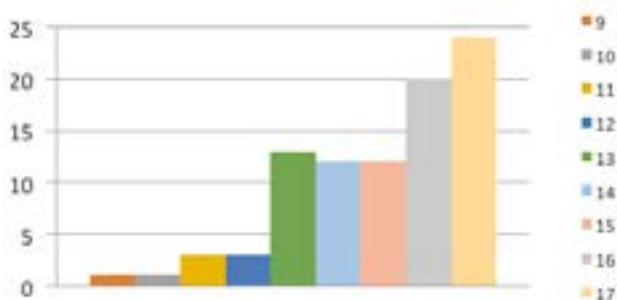


The CSE assessment tool was amended during Q3 to remove the dual 'low/medium' banding. This was to encourage practitioners to consider the available evidence more carefully and reach a more definitive assessment.

The charts below show the profile of those that have had CSE assessments carried out



■ Male ■ Female



*There is a continued decrease in the number of 16 / 17 year olds being identified at being of risk of CSE.*

## What we have learned and what difference we have made

As a result of the Board's activities, there is a greater awareness across Herefordshire of CSE. The Board recognised that its Child Sexual Exploitation strategy was in need of reviewing and refreshing, and that a renewed drive was needed to ensure we remain fully effective in tackling CSE and the risks created by children going missing.

Whilst numbers of children reported missing from home and school has remained relatively constant, there was a decrease in reports from placement providers of children missing from care, with 96 reported missing between April and June and only 52 reported between July and September and this downward trend continued. This may be attributable to the targeted work of the police care home team in working with care homes in regarding to the missing person protocol.

## What we will do next

During 2017/18 the CSE & Missing subgroup of the HSCB will be supporting the Herefordshire Community Safety Partnership in achieving its new priority for 2017 – 2020 of reducing sexual offending against children in the county.

Through 2016/17 the CSE & Missing subgroup has supported the operational group in reviewing and updating the various pathway documents and guidance for professionals in relation to dealing with CSE and missing children. In the coming year the subgroup will be working to ensure that these documents are well understood by practitioners and embedded in practice.

**Priority 2: The child's journey through the child protection process ensures effective planning and intervention to improve the care, safety and wellbeing of children and reduce/eradicate actual or the risk of significant harm.**

## What we have done

HSCB has been active in a number of areas in order to achieve improvements in this area of activity, in particular because data suggested that Herefordshire had a higher rate of children who were subject of a child protection plan than might be expected, when comparisons were made with the county's 'statistical neighbours.'

### a. Children living with domestic abuse

In October 2016 the Quality Assurance subgroup conducted an audit to assess the quality and effectiveness of services provided locally for children living in a household where domestic abuse is present. The audit framework used in the Joint Targeted Area Inspection (JTAI) process, which are inspections conducted by HM Inspector of Constabulary (HMIC), Care Quality Commission (CQC) and Ofsted, was used to ensure a thorough review of the cases, and achieve the best possible learning from the process.

Six such cases involving children were selected at random. A review of the case notes for these children's cases was completed to ensure that a full range of circumstances was included within the audit, and the response of all the agencies involved with the child and their family could be considered. All of the children either were or had been within the child protection process within the previous six months, and this audit therefore gave a very clear picture of how effective the work of the agencies had been in using the child protection process to safeguard children living within a domestic abuse environment.

The audit evidenced some high quality direct work which had clearly led to improved outcomes for children and their families. Within the cases examined there was evidence of the child's voice being evident, and good communication across agencies.

There were many instances of well attended statutory child protection meetings. Strategy discussions and resulting responses and actions were timely in all but one case, where a strategy meeting had been recommended with no evidence that it had taken place.

There was often more than one male included in the family make up. However, assessments and plans for the children were often concentrated on the mother, even when the male in the family had parental responsibility. During the audit, males were seen as 'shadowy' figures in the background, and work needs to be done with perpetrators in relation to addressing their behaviour.

'Compromised parenting' was a common factor within the cases examined. In five out of the six cases, there was information that either both or one of the parents had issues with substance (drugs) misuse, and half of the families were noted to have engagement with adult mental health services.

Whilst there were many instances of proactive work, there were examples of information sharing being seen as potentially problematic, with delays in communication in two cases. In one case, information sharing between nursery and school was cited as difficult too.

Vennture, a charitable organisation based in Hereford, was seen as a good support for children and families. In one case, the intensive involvement of Vennture was seen as helpful, especially the positive impact its worker had in engaging and working with the mother and then encouraging her to work with other agencies.

The audit highlighted how HSCB and the Community Safety Partnership Domestic Violence and Abuse Delivery Group need to ensure that there is clarity across agencies in relation to how Multi-Agency Risk Assessment Conferences (MARAC) are used when a child already has a child protection plan or child in need plan in place, to avoid any confusion in ownership and management of risk. The audit also highlighted the need for Addaction, the drug and alcohol support service, to be seen as a service central to protecting the child, rather than having a peripheral role. Finally, the audit highlighted that professionals tend to focus on the mother and her ability to keep the child safe, and there needs to be greater focus on the perpetrator in the context of assessing the risk presented to the child.

During 2017/18 the HSCB will be monitoring how each agency responds to the recommendations on how services to children within the child protection process as a result of domestic abuse can be improved, in order to improve the safety of children living with domestic violence.

In addition to the audit work, in September 2016 the Board received a report from the Domestic Violence and Abuse Delivery Group of the Community Safety Partnership. This report updated the Board on the prevalence of domestic violence and abuse in Herefordshire with a specific emphasis on children who witness and experience domestic violence and abuse.

Data in relation to the numbers of children in Herefordshire that have been recorded as being exposed to domestic abuse, and numbers of children and young people involved with the Children's Independent Domestic Violence Advisor is available in Appendices 3 and 4.

It was recognised by the Board that the standard Domestic Abuse Stalking and Harassment (DASH) risk assessment in use in Herefordshire was not always suited to situations where the victim of the domestic abuse was under 18 years of age. This is an issue that has also been highlighted within a Serious Case Review from a neighbouring LSCB. To ensure every opportunity is being taken to improve the safety of young people subject to domestic abuse, the Board worked with the Domestic Violence and Abuse delivery group of the Herefordshire Community Safety Partnership to introduce a bespoke DASH risk assessment form which is better suited to using with younger victims.

## b. Child Protection Review Conferences

Between April 2016 and November 2016, nine members of the Herefordshire Safeguarding Children Board attended a number of child protection review conferences and recorded their observations.

The feedback was captured within a number of specific areas, for example the quality of the multi-agency work, how well the child's views and experience were captured and then taken into account, and the quality of the conference process and resulting child protection plan. It was helpful to all concerned to have the Board members in a position to record exactly what they saw of the child protection system being used in practice and then feedback to practitioners. The range of comments recorded by Board members included:

- "The social worker had completed a comprehensive report which was circulated prior to the meeting. The report had been shared with the mother nine days before conference."
- "The baby was well catered for, playing happily with toys, under the supervision of his grandmother. This kept the child firmly in focus throughout the conference."
- "Child's father attended and was very much involved in the discussions."
- "Young person attended and made her views well known."
- "Mother and son were very well supported during the meeting. The Chair made sure, at every stage, that they had the opportunity to contribute and that they understood what was being said."
- "The paternal grandmother is a significant figure with regular care of the baby, but was not present. Again, it is not clear whether she had been invited."

- "Reports were analytical to a point. However, language used in some reports, particularly the social workers, was technical and therefore questionable how much was understood really. Professional language code not helpful to families."
- "The Chair was very clear with the child, asked him at every stage if he understood and wished to add anything. The Chair supported the child to read out part of a statement that he had written which outlined how individuals from agencies had supported him and helped him to feel better about the situation with his Mother and with life in general. The agency workers had also support the child to look forward and to plan a future for himself."
- "In considering the risk and ongoing management of this matter, there was no recognition of or discussion about any possible course of action should the father of the child recommence their relationship with the mother, the ending of this relationship having been a significant factor in the assessment of reduced risk to the child."
- "There was no attempt to outline the implications for parenting of continued dependence on methadone, including issues re safe storage."
- "This baby was made the subject of a child protection plan since birth. From discussion at the conference, the correct agencies appear to have been involved, the CP plan was clearly understood by the parents, and a number of risks identified and addressed."



Since the visits and feedback there have been a number of changes made which will improve the child's and family members' experience of child protection conferences and also improve the effectiveness of planning and sharing of information within the meeting. Examples of this are:

- New accommodation has been found which gives a more pleasant environment for all involved, with waiting areas, a children's play area, and baby changing facilities;
- Changes are being made to the social worker report template to help ensure the best possible planning of conferences takes place in partnership with families;
- The format of the reports submitted by partners to the conference, and the information attendees are provided in the invite letters, have been updated to make expectations and process clear to all;
- Practitioners' knowledge of how they can most effectively contribute to child protection conferences is being enhanced through multi-agency training and practitioner forums;
- Further visits will be conducted in 2017/18 with the intention of looking specifically at whether progress has been made within the identified areas for development.

During the year the Board also received assurance on the effectiveness of the Independent Review Officer (IRO) service in Herefordshire, which has a key role in relation to the improvement of care planning for children. The work of the IRO's in Herefordshire, and the direction of travel for the service is positive; for example, the majority of all reviews for 'Looked After' children were held within statutory timescales, the IRO team has moved to a full set of permanent staff, so providing continuity for children in care, the IRO's routinely advocate on behalf of children and young people and ensure they are aware of their rights and entitlements, that they have opportunities to participate in and contribute to the review of their care plan, and that their voices are heard and inform their planning. The significant reduction in the number of children on a child protection plan during 2016/17 through the appropriate application of the threshold guidance has supported IRO's in focusing on those children who most need their support, so improving the service those children and young people receive, and the outcomes for them.

## c. Developments within the child protection system

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During 2016/17 the conduct of both child protection conferences and strategy discussions were further enhanced by Children's Wellbeing Services. Following an audit of child protection casework and conferences, the Board requested amendments to the guidance for professionals attending child protection meetings to ensure a clear focus on the risk to children and evidence of harm and granted the Conference Chairs the power to veto decisions that are not supported by evidence. This approach also informed a review of child protection strategy meetings. The result of this work has been a sustained reduction in the number of children subject of child protection plans. This reduction has meant that professionals have more time to respond effectively to those children who are subject of a plan while other families are supported through the children in need process. Further checking has assured the Board that this reduction has been achieved safely, and without children being put at risk of significant harm.

### Multi-Agency Safeguarding Hub

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In January 2016 the Board commissioned a review of the practices and processes of the Herefordshire Multi Agency Safeguarding Hub (MASH) at that time. This was prompted by concerns that the MASH was not functioning as effectively as it could, and that the volumes of child protection activity did not reflect Herefordshire's population size and statistical neighbours. This report was received and considered in April 2016, and was the result of a comprehensive review by the (then newly appointed) Assistant Director Safeguarding and Family Support in Herefordshire, which examined all aspects of the MASH function, including the application of the Threshold Guidance at point of referral, the quality of referrals, information sharing and the resulting strategy discussions.

The report highlighted that the Herefordshire MASH was very fortunate to have a group of skilled, knowledgeable and experienced professionals who were committed to working together. Further, decisions were made quickly, meeting statutory expectations. However, a number of areas for development were also highlighted. The Board was informed that the role of the MASH was unclear, and this was not helped by the need for an update of the MASH Standard Operating Procedures, and the need to be clear on the distinction between a 'contact' and a 'referral'. The transmission of a concern had become confused with a request for service, and this was having an impact on the effectiveness of the MASH. Further, there was no shared IT system within the MASH, which contributed to slow information sharing. The Threshold Guidance was not being used consistently as the basis for decision making, and strategy meetings were focusing more on historical information and the behaviour of the parents, rather than the evidence for the impact of these upon the child. A number of recommendations were made, which were accepted by the Board.

As a result of this work, there have been a number of changes made through 2016/17 to improve the functioning of the MASH, and so ensure that children and young people who are referred receive the appropriate service to meet their needs. The multi-agency MASH Governance Board was reconstituted to oversee the delivery of the recommendations and required improvements. This board now has a smaller membership and continues to meet regularly. The MASH now clearly distinguishes between referrals and contacts, so focusing professions' efforts on the core role of the MASH, that being to enhance the management of the children and young people considered to be most at risk. Discussions continue to take place with those responsible for delivering the early help strategy to make sure that those children who do not meet that level of need receive the appropriate support. This is an area which the Board will be monitoring in 2017/18 in line with the early help priority. A forthcoming LGA peer review (scheduled for September 2017) will also contribute to the Board's understanding of the effectiveness of these arrangements.

The Board has continued to emphasise the importance of the Threshold Guidance document within its multi-agency training, so supporting the improvement in the quality of referrals to the MASH. Funding has been identified to pay for a MASH specific IT programme to support the work of the team and software options are currently being explored.

The challenge remains in 2017/18 for the MASH Governance Board to continue to improve strategy meeting practice; however, it is recognised that this will need the support of all Board members in ensuring their organisations contribute appropriately to the referral, gaining of consent, information sharing and child protection processes as required, and the Board will continue to monitor that contribution.

### **Unaccompanied asylum seeking children**

Throughout 2016/17, the Board has received regular updates in relation to partners' arrangements and readiness to receive unaccompanied asylum seekers. The Board has assured itself that both accommodation and services were in place to receive the anticipated numbers of these children and young people, recognising that their experiences would require access to particular types of specialist support.







## Priority 3: Identification and response to childhood neglect.

Tackling childhood neglect remains a key challenge for the Board. As can be seen from the figures below, Herefordshire reflects the national pattern where neglect is the most common reason for children being made subject of a child protection (CP) plan.

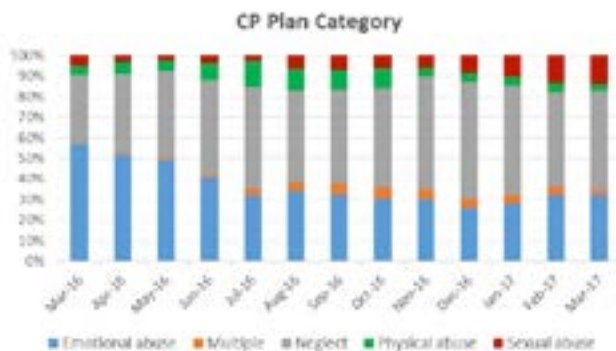
1. Number of children subject of a CP Plan by category as at the last day of each quarter 2016/17.

### What we will do next

The results of the audit of children living with domestic abuse will be reported on in early 2017/18 and the HSCB will be monitoring how each agency responds to the recommendations on how services to children within the child protection process as a result of domestic abuse can be improved. In addition, in 2017/19 the Board will be working to ensure that;

- Learning from the Child Protection Conference observations is embedded through further Board member attendance.
- Our Board procedures are in line with regional arrangements and statutory guidance so children receive the correct response.
- We use multi-agency performance data well to monitor the effectiveness of local safeguarding practice and the quality of child protection plans.
- We get feedback from children and young people who have experienced the child protection journey to understand the effectiveness of the local safeguarding system.
- Learning from our Serious Case Review and Practice Learning Reviews is used appropriately to improve the journey of the child through the child protection process.
- We will continue to monitor national events and decisions in relation to young unaccompanied asylum seekers and ensure services are in place to meet their needs when required.

| Category        | Q1  | Q2  | Q3  | Q4  |
|-----------------|-----|-----|-----|-----|
| Emotional Abuse | 41% | 32% | 26% | 32% |
| Multiple        | 1%  | 5%  | 5%  | 2%  |
| Neglect         | 47% | 46% | 56% | 49% |
| Physical Abuse  | 8%  | 10% | 5%  | 3%  |
| Sexual Abuse    | 3%  | 7%  | 8%  | 14% |



## What we have done

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The 'family HJ' Serious Case Review which was commissioned by the Board in October 2015 delivered a final report in December 2016. The circumstances of the incident covered within the Serious Case Review reinforced the importance of the identification and response to childhood neglect being a priority for the HSCB, and made a number of recommendations to the Board on how the response to childhood neglect could be improved. The first of these recommendations was that the HSCB should ensure that there is an effective multi-agency childhood neglect strategy in place. As a result the Board has developed a childhood neglect strategy, and this is now available to view on the website.

The neglect strategy sets out the strategic aims and core objectives of the Herefordshire Safeguarding Children Board in relation to the prevention, identification and response to childhood neglect, and how the broader partnerships support and contribute to those. This strategy also sets out the key principles under which work around neglect should be undertaken and identifies key priority areas of work in order to improve our collective response to neglect. The strategy forms part of Herefordshire's approach to Early Help, which is led by the Children and Young People's Partnership, complements other key strategies within the partnerships, including Herefordshire's Health and Wellbeing Strategy and the Community Safety Partnership Strategic Plan, and supports the Herefordshire Levels of Need Threshold Guidance.

The strategy also sets a number of objectives for the HSCB to achieve, covering such things as improving the early recognition of neglect through the use of effective early assessment tools, providing training for practitioners in identifying neglect and what then to do about it, monitoring the effectiveness of that training, carrying out audits of neglect cases to check that the response is improving, and ensuring that the views and opinions of the children and young people who may be experiencing or at risk of neglect are properly taken into account.

In order to ensure that these objectives are achieved, the Board has requested the members of the Policy and Procedures subgroup to focus their efforts entirely on delivering the necessary changes. In addition, throughout 2017 – 2018 there will be an update on the progress of the work of this group at every Board meeting, in recognition of the importance of momentum being maintained.

A further recommendation from the Serious Case Review was that the HSCB should request that Early Help and other safeguarding processes consider and reinforce the whole family approach. This is in recognition that neglect very rarely happens in isolation, and is often caused or exacerbated by other problems and challenges already existing within the family. As a result of this recommendation, Herefordshire's Early Help Strategy, which reinforces the 'whole family' approach, has been endorsed by the HSCB, the Health and Wellbeing Board and the Children and Young People's Partnership. This will be supported by delivery of whole family approach training to practitioners.

- To support our understanding of the effectiveness of the response to childhood neglect in Herefordshire, HSCB's Quality Assurance subgroup held a focus group in February 2017 which was attended by professionals from a broad range of partner agencies. The session consisted of ten questions which were put to the members, who then discussed these based on their experiences of actually working with children, young people and their families within the current partnership structures:
- How well do we understand the nature and scale of neglect in Herefordshire?
- How far are children, young people, parents and carers able to seek and receive help?
- How well are the public supported to report concerns about child neglect?
- How well do staff in universal and targeted services recognise and work together to help children at risk of, or currently experiencing, neglect?
- How well do staff in specialist services recognise and work together to help children at risk of, or currently experiencing, neglect?
- How effective are local systems and mechanisms to assess a range of intelligence about concerns for a child and support informed decisions about when, how and who should intervene?

- How well are practitioners equipped to recognise and intervene in cases of neglect, supported by local guidance and evidence based assessment tools; able to access reflective supervision?
- How far do services commission/provide accessible, high quality, evidence based targeted support for children/young people and parents/carers with additional needs?
- How is the neglect strategy and toolkit embedded in agencies that don't predominantly work with children?
- How effective is the strategic leadership of the local response to neglect?

A number of themes emerged from this exercise, and the key ones are summarised below:

- There is a need to ensure that the definition of neglect and how thresholds relate to neglect is well understood across agencies, and reassurance is needed that these are applied consistently;
- A suitable toolkit to support the assessment of neglect cases is needed;
- The understanding of the resolution of professional disagreement policy needs to be strengthened across agencies, and work is needed to strengthen practitioners' confidence in using the policy;
- There are differing views between practitioners in relation to the willingness to share family information without appropriate consent;
- Concerns were expressed in relation to the provision of commissioned service for tiers 1 and 2 (emotional support). Additionally, there is a need for greater understanding amongst practitioners in relation to CAMHS and their need to focus specialist services on those at greater risk of harm, rather than providing a universal service.

### **What we have learned and what difference we have made**

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In relation to learning for the HSCB, the Serious Case Review and feedback from practitioners has highlighted the need to focus on the response to childhood neglect, embed the neglect strategy, introduce a common toolkit for identifying and assessing levels of neglect, and provide multi-agency training which addresses the identified themes. This has led to a series of roadshows being held for practitioners to raise the awareness of childhood neglect, how to recognise it and when and how to report it.

Specific learning came from the 'Family HJ' serious case review in relation to children with disabilities. The Board has learned that there is a need to improve the knowledge of disability amongst practitioners, including how current procedures and good practice relate to situations involving children with disabilities, to review the appropriateness of the current 'Levels of Need' guidance to assessing children with disabilities, and to ensure that disagreements about cases can quickly be resolved using the 'resolution of professional disagreements' procedure.

### **What we will do next**

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Tackling childhood neglect in Herefordshire is the key priority for the Board in the coming year. As such the Board will be working hard to achieve the objectives set out in the strategy, and an implementation group has been formed to drive this activity. Specifically this group will be:

- Developing a costed plan for introducing the Graded Care Profile 2 (GCP2) in Herefordshire
- Identifying the agreed number of multi-agency trainers and then delivering training in the use of GCP2.
- Ensuring that the forthcoming section 11 audits assesses the availability, quality and impact of single agency childhood neglect training within the partner agencies. This will be supported by the Board providing core training materials on neglect for use within partner agencies.
- The Board will promote the importance of this work, which will include a conference on childhood neglect for practitioners.
- The Board will be challenging agencies where practice relating to the capturing of the views of children who are at risk of or suffering from neglect needs improvement.
- The Board will be forming a specific task and finish group to examine how the Board can be assured of the effectiveness of the response to children with disabilities within Herefordshire, and how it can support improvements where necessary.

Introduction of the Graded Care Profile (GCP) will form an important part of the development of our response to childhood neglect. The GCP2 is a practical tool which supports practitioners in measuring the quality of care delivered to an individual child from an individual carer or carers over a short window of time, and is designed to give a representative overview of the current level of care. During 2016/17 the HSCB multi-agency training on childhood neglect was reviewed to include a section on the use of this tool, however a more comprehensive approach to implementation of the most up to date GCP assessment tool across partner agencies will be one of the Board's key activities during 2017/18.

The HSCB, via the Quality Assurance subgroup will also be collecting data against the agreed scorecard, which is closely linked with Herefordshire's 'Families First' dataset, in order to measure the effectiveness of the changes.

**Priority 4: The early help services effectively identify needs and concerns relating to children and families, and services address these needs through effective planning and interventions to enable families to function effectively and children's needs are met and they are supported to achieve their full potential.**

This priority area continued the Board's support for the Herefordshire Children and Young Person's Plan, which has established early help as a key priority.

Early help arrangements are important for the children and families of Herefordshire. There are children and young people at risk of harm but who have not yet reached the threshold of "significant harm," for whom a preventative service would reduce the likelihood of that risk of harm escalating. These children and young people might be identified by local authorities, youth offending teams, probation trusts, police, adult social care, schools, primary, mental and acute health services, children's centres and local safeguarding children's board partners including the voluntary sector.

## What we have done

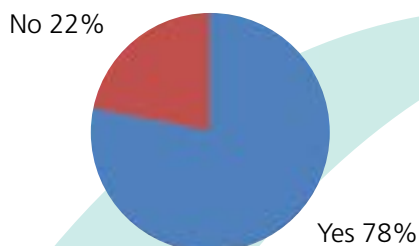
### a) Thresholds for intervention

Following the development of the 'Levels of Need' during 2105/16, a guide to support professional judgement when considering help that children and families need and when to refer concerns, the HSCB Policy and Procedures subgroup has reviewed and revised the Levels of Need Threshold guidance and the multi-agency referral form during 2016/17. A task and finish group was held to address this work at the end of October with good and enthusiastic representation from across the partnership. The conclusion of the group was that a revision rather than a major re-write was required to ensure HSCB levels of need were compliant with Working Together 2015 and gave greater clarity to practitioners to inform their decision making on a child's level of need. It was recognised, for example, that the 'Levels of Need' document needed to include a greater emphasis on early help, to include links to service provision, to give greater clarity to the needs of children whose health and development are impacted by compromised parenting, and clarification of criteria for eligibility for Children with Disabilities social work service.



To help the Board understand how well the Levels of Need document is understood and being used within Herefordshire, the Quality Assurance subgroup ran a survey audit for practitioners which asked a number of questions of staff. 246 responses were received from ten different partner agencies, and examples of the questions and responses can be seen below.

## 1. Do you know how to access the levels of need guidance?



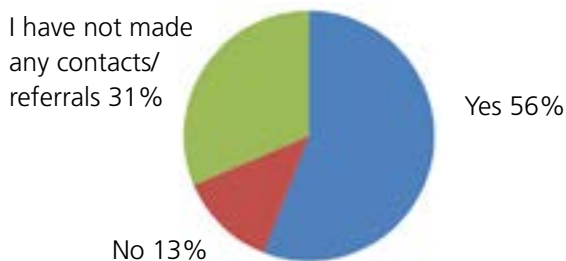
|                   | Number of respondents | Per cent of respondents |
|-------------------|-----------------------|-------------------------|
| Yes               | 189                   | 78%                     |
| No                | 53                    | 22%                     |
| Total respondents | 242                   | 100%                    |
| Not answered      | 4                     |                         |

As can be seen from the charts, 78% of respondents reported that they knew how to access the document, and reassuringly the majority of those that had needed to make a contact or referral had used the Levels of Need to inform that submission.

Practitioners were also asked whether they had received feedback on their referral, or whether they had ever used the Levels of Need guidance to challenge decision making on the outcome of a referral or contact they had made.

The focus on improving the awareness and understanding of the Levels of Need amongst practitioners, together with the ongoing drive to ensure that they are correctly applied in assessment and decision making has contributed significantly to the reduction in the number of children and young people in Herefordshire on a child protection plan. The data monitored by the Board tells us that in January 2016 there were 277 children on a plan, however this had reduced to 117 by 31 March 2017. This means that children and young people are now being supported and safeguarded at the appropriate level, and practitioners are able to provide sufficient focus on those that are most in need of help, so improving the outcomes for those children and young people.

## 2. Do you use the levels of need guidance to inform contacts/referrals made to Multi Agency Safeguarding Hub (MASH) where you have concerns for the welfare or safety of a child?



|  | Number of respondents | Per cent of respondents |
|--|-----------------------|-------------------------|
| Yes                                    | 137                   | 56%                     |
| No                                     | 31                    | 13%                     |
| I have not made any contacts/referrals | 77                    | 31%                     |
| Total respondents                      | 245                   | 100%                    |
| Not answered                           | 1                     |                         |



## b) Early Help strategy

HSCB adopted an Early Help Strategy in the spring of 2016 and its implementation is being led by the Children and Young People's Partnership. The Council's Head of Additional Needs now manages an integrated 0-25 SEND Service which will give children and their families a more consistent and coherent service. The Head of Learning and Achievement has overseen the review of over half of Herefordshire's schools' safeguarding policies to ensure that they are fit for purpose and understood by staff.

The HSCB has continued to support and challenge the development of Early Help services within Herefordshire. The Board received a report from the Council, on behalf of the Children and Young People's Partnership, on the development of the Early Help response, and was reassured that the effectiveness of this response continues to develop. Specifically, strategic and operational groups with clear terms of reference have been formed and are reporting to the Children and Young Person's Partnership. These groups are examining carefully how need is identified, who it is that assesses, what they do with the information, how it is shared, the permission to share and what happens as a result. We know there are many universal services such as schools and health visitors supporting children and families with significant needs along with local authority family support and commissioned services like Vennture and Homestart. These operational groups are now working to ensure all of these arrangements are coordinated effectively, and examples of work undertaken and progress being made include:

- An early help strategy has been developed and was approved by Herefordshire Council in October 2016. Operationally the Council continues with the multi-agency group (MAG meetings) and the oversight and management of common assessment framework (CAF) procedures;
- The CAF assessment and support plan has been aligned with the eligibility criteria and the Herefordshire outcomes framework (Families First) so that the maximum number of families are identified, engaged and are being supported to work towards achieving sustainable change;
- Audit arrangements with HSCB Quality Assurance subgroup have been trialled, and an audit tool has been developed to support this activity;

- Extensive engagement work with professionals, parents and community representatives has been undertaken to explore the early years and early help delivery. This is an important strand of the approach as it provides opportunities for communities to develop support arrangements that will in the long term reduce the likelihood of circumstances and risks of poor outcomes escalating.

From 26 to 30 September 2016, Ofsted and the Care Quality Commission (CQC) conducted a joint inspection in Herefordshire to judge the effectiveness of the area in implementing the disability and special educational needs reforms as set out in the Children and Families Act 2014. The inspection was led by one of Her Majesty's Inspectors (HMI) from Ofsted. The team members comprised an Ofsted Inspector and a Children's Services Inspector from the CQC.

Inspectors spoke with children and young people who have special educational needs and/or disabilities, parents and carers, representatives of the local authority and National Health Service (NHS) officers. They visited a range of providers and spoke to leaders, staff and governors about how they were implementing the special educational needs reforms. Inspectors also met with leaders from the local area for health, social care and education. Inspectors reviewed performance data and evidence about the local offer and joint commissioning.

As with all such inspections, there was a considerable amount of feedback from Ofsted, and the overall positive nature of this feedback has been highlighted by the resulting contact received by Herefordshire from other areas wishing to learn from the local practice.

A summary of some of the key findings is provided below;

- Leaders have a clear understanding of the strengths and weaknesses of the different partners who contribute to the implementation of the reforms. This, combined with a strong sense of purpose and aspiration to improve outcomes for children and young people who have special educational needs and/or disabilities means that partners are taking increasingly effective action to ensure that the reforms are implemented well.

- The service provided by the tier 3 child and adolescent mental health services (CAMHS) is of a very high quality.
- The children and young people who spoke with inspectors indicated that they are happy, safe and well supported. Their independence is being developed well and they have high aspirations for themselves.
- The local area has clear procedures in place to check that children and young people who have special educational needs and/or disabilities are safe.
- Health visitors deliver the healthy child programme well. A two-year integrated review enables appropriate intervention and support for children and their families where progress is less than expected.
- Leaders acknowledge that some schools' identification of the needs of older children is not precise enough. Herefordshire has a higher proportion of children and young people identified by schools as requiring special educational needs support than the English average.
- Systems are in place to ensure that the needs of vulnerable groups are met. For example, the dedicated nurses work creatively to engage children looked after by the local authority in their health care assessments. This has resulted in almost all young people looked after attending their health assessment in the last year.
- The views of parents are not used consistently in assessing the needs of children and young people. Parents do not feel fully consulted and parents' groups have not been suitably involved in strategic planning.

## c) Single Agency Assurance Reporting

The Board has continued to monitor the effectiveness of agencies' individual contributions to safeguarding, including the early help support they provide, through regular assurance reporting. An example of the assurance reporting process and challenge resulting from the Board was in relation to the Addaction report considered in October 2016. Addaction is the commissioned provider for drug and alcohol services in Herefordshire, and had recently been awarded the contract for this work. Addaction recognised the need to make a number of fundamental changes in the way services were being delivered, and highlighted these within its assurance report to Board. Based on evidence from its various quality assurance activities, the Board in turn challenged Addaction in relation to the lack of provision for young people, the lack of premises in which to deliver a service to young people, and the safeguarding of young people in the care of adults known to the treatment services. Following these challenges, Addaction was later able to update the Board that their young people's service had been brought up to full strength and that services were being delivered in appropriate accommodation in line with best practice. In addition, Addaction was able to reassure the Board that processes were in place to establish the parental status of the service user, and then if a parent, explore their capacity to fulfil their responsibilities to the child(ren). This is supported by a very good working relationship with the Multi-Agency Safeguarding Hub.

In challenging Addaction in this manner, the Board has been able to ensure that children and young people who are living with parents with drug or alcohol issues, or have such issues of their own, are correctly identified as being more likely to need early help as a result, and where necessary that those children and young people are given access to that help at the correct level and by the most appropriate agencies. It also gave the Board the opportunity to review its own hidden harm policy to ensure it supported and complemented the work of partner agencies.

During 2017/18 the Board will continue to seek assurance that Public Health as service commissioner receives suitable assurances from Addaction that children living with people who abuse substances are identified and safeguarded.

## What we have learned and what difference we have made

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From the Levels of Needs survey the Board now understands better the use of the Levels of Need by practitioners when they make a referral. We also now know that we need to raise the awareness of the Levels of Need document for practitioners within certain areas, for example within the Police.

During 2016, the HSCB Quality Assurance subgroup conducted a multi-agency audit of six randomly selected early help cases which involved examining in detail how the cases had been dealt with by partner agencies.

This audit highlighted outstanding practice in some of the cases, for example excellent and sustained engagement from schools, good engagement with the family, stability in the membership of the team working with the family, and being able to provide the right service to families at the right time. It also highlighted some areas for development, for example better inclusion of fathers in the Common Assessment Framework process when appropriate, and use of a chronology in certain circumstances.

Through the multi-agency audit team examining these cases in detail, further opportunities were identified to help two of the children, and this help has now made a significant difference to them.

One of the families included within the audit was from the Traveller community. The audit highlighted that the expectations set for the family within their Common Assessment Framework discussions had not taken into account the conditions under which they were living. As a result of this finding, multi-agency awareness sessions were provided in order to raise the understanding of practitioners in Herefordshire of the Traveller community, with the intention of improving outcomes for children and young people from this community.

## What we will do next

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As a result of the Levels of Need audit, the Board via the Workforce Development subgroup has ensured that sufficient emphasis is placed on the use of the Levels of Need Guidance within the various training courses provided. Board representatives have also been asked to reflect on how they can support increasing the knowledge and use of this document within their own agencies. The Board will also complete its review of the Levels of Need, and then promote awareness of those changes across the partnership.

The Board will be supporting the work of the Children and Young Person's Partnership in ensuring that the workforce is sufficiently prepared for the shift in emphasis towards early help by ensuring that HSCB training products promote understanding of the early help offer.

The HSCB Quality Assurance subgroup will also be developing a set of assurance questions for use in assessing the effectiveness of the changes to early help arrangements and will be carrying out an audit of early help cases during 2017/18.





# 6. How the HSCB has carried out its statutory functions

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LSCBs have a statutory responsibility to:

- Co-ordinate what is done by each person or body represented on the Board for the purposes of safeguarding and promoting the welfare of children in the area, and
- ensure the effectiveness of what is done by each such person or body for those purposes.

LSCBs also have a number of statutory functions to fulfil, and this section of the report provides details of work against those functions and the wider areas of safeguarding additional to the priority areas for 2017/19.

## a. Policies, procedures, practice guidance updates

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By far the most significant achievement for the HSCB Policies and Procedures subgroup for 2016/17 is the successful implementation of the West Midlands Regional Safeguarding Procedures Project. The West Midlands Regional Safeguarding Children Procedures website was launched on the 01 April 2017.

Herefordshire Safeguarding Children Board has joined eight other safeguarding boards across the region to develop the regional procedures, procure a host platform for the procedures and collaboratively launch the project. The initiative has provided policy consistency across boards in the region, economies of scale (significantly reducing the cost of providing multi-agency procedures), and accessed regional expertise on policy development.

The HSCB Policies and Procedures subgroup oversaw the development of the project from the Herefordshire perspective, providing Board governance and the subgroup ratified several procedures to be adopted by the region.

The functionality of the website allows professionals to access procedures on three levels. Level 1 procedures are those that are overarching child protection procedures, Level 2 procedures are those agreed at a regional level, and Level 3 procedures are area specific, including referral guidance, local levels of need, and named contacts.

The Regional Safeguarding Procedures Group (RSPG) continues to meet regularly with HSCB representation. RSPG has a rolling programme in place to refresh and update the West Midlands procedures.

Notable local Herefordshire policy developments during 2016/17 include the development and publication of the Parental Substance Misuse, Hidden Harm and the Impact on Children and Young People guidance, and the Suicide Prevention Pathway. Also on behalf of the region, the HSCB Policies and Procedures subgroup has developed the regional policy and guidance on Sexually Active Children and Young People (including under age sexual activity).

## b. Training

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### Multi-agency training

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The Board has developed a Multi-Agency Workforce Strategy which determines the workforce development plans for all who work with and support children and young people at risk to ensure that they are skilled and competent. It includes learning from serious case reviews and changes to legislation. The updated workforce strategy also includes a validation process and competency framework.

Provider services / training providers are invited to apply to have their training programmes validated as meeting the requirements of the strategy and new competency framework. This new strategy and validation process has been developed to support the HSCB to fulfil its statutory functions under regulation 5:

“monitor and evaluate the effectiveness of training, including multi-agency training, to safeguard and promote the welfare of children”. (WTSC 2015 page 67)

The new evaluation process has been established and used with learning events delivered on behalf of the HSCB. This will enable the subgroup to measure whether the learning events have made an impact on the knowledge and skills of the workforce to enable families to function effectively and ensure children's needs are met and they are supported to achieve their full potential.

The HSCB has established a series of multi-agency "Practitioner Forums" aimed at front line practitioners and managers. The aims of these forums are:

- To support practitioners to take professional judgement-based approach to safeguarding rather than a purely process driven approach;
- To share good practice across agencies to improve standards;
- To share learning from audits, investigations and serious case reviews
- To act as a conduit for the HSCB to share key messages and information with front line practitioners, and to receive feedback so that the voice of the practitioner is taken into account in the work of the HSCB

Improving numbers attending the Joint Safeguarding Practitioner Forums is encouraging, with the last 2 forums being booked to capacity. We have had 330 bookings and 236 practitioners attended over the 7 sessions this year who have represented 48 agencies. This forum programme included dissemination of learning from serious case reviews, informing practitioners about the work of the Board, Care Act and Making Safeguarding Personal. From each Practitioner Forum a Voice of the Practitioner report is developed and presented to HSCB Executive Group.

The specialist conference "Silent Victim" was held this year at The Kindle Centre on Oct 19th and was attended by 122 practitioners drawn from over 30 agencies based in Herefordshire. Evaluations from the event were positive, particularly for two presenters who were talking from their own personal experience and the session highlighting the barriers faced by people from the minority communities.

The Training Pool was launched in June with over 30 people showing an interest in joining and supporting the group. A full programme of development activities was developed to support the trainers but unfortunately due to a very low uptake these were cancelled. A new approach to the Training Pool has now been agreed and for the coming year; subject matter experts will work with the HSCB training resource to develop the specialist training and agree the delivery programme. This will make best use of resources and provide opportunities to extend the training offer to meet the requirement of the new competency framework.

### Numbers attending HSCB multi-agency training courses 2016-17

| Course   | Numbers |
|--|---------|
| Targeted Working Together to Safeguard Children, 1 day             | 157     |
| Targeted Working Together to Safeguard Children half day refresher | 38      |
| Targeted Course Understanding Neglect                              | 40      |
| Child Sexual Exploitation, half day                                | 32      |
| Child Protection Conferences                                       | 17      |
| Domestic Abuse 3 day course  | 43      |
| HSCB/HSAB Practitioner Forums                                      | 236     |
| Serious Case Review Learning Event                                 | 48      |

### c. The safety and welfare of children who are privately fostered

A child under the age of 16 (under 18 if disabled) who is cared for by someone who is not their parent or a 'close relative' is deemed to be privately fostered. Private fostering is an arrangement made between a parent and a carer for 28 days or more. The council has a legal duty to make sure that all private fostering arrangements are safe for the child, that they are being looked after properly, that appropriate arrangements are agreed between parties and that everyone involved knows who to ask for help if advice or support is needed. Parents and carers also have a legal duty to inform their local Council about any private fostering arrangements. HSCB receives an annual report about private fostering in Herefordshire.

The team responsible for managing private fostering arrangements has continued to work hard to increase the awareness of what constitutes private fostering and the need to notify such arrangements. This has included the production and circulation of leaflets, training to practitioners, regular communication with their colleagues in health, schools and other agencies, the use of social media and a quick guide on private fostering has been developed and is now available to staff. In July 2016 the HSCB Business Unit supported this by providing information about private fostering at a public event in High Town, Hereford.

In 2016/17 there were four private fostering arrangements notified to the Local Authority. Although this is a slight increase on last year's figure, the number does still appear low, and demonstrates the need for awareness raising to continue in this area.

### d. Children in care

The HSCB take an active interest in the numbers of children in care in Herefordshire, how this compares with a statistic neighbours, and most importantly the quality of service that children and young people receive whilst in the care of the local authority.

| Month  | LAC Numbers |
|--------|-------------|
| Apr-16 | 276         |
| May-16 | 271         |
| Jun-16 | 275         |
| Jul-16 | 279         |
| Aug-16 | 281         |
| Sep-16 | 286         |
| Oct-16 | 284         |
| Nov-16 | 289         |
| Dec-16 | 294         |
| Jan-17 | 295         |
| Feb-17 | 305         |
| Mar-17 | 302         |

Figure 1

During 2016/17 there has been a steady increase in the number of looked after children (LAC) in Herefordshire (Figure 1). We know from regional in-year benchmarking and other additional analysis, that our number of looked after children per population is approximately 7% higher than other West Midlands authorities, 60% higher than our statistical neighbours and double that of those with similar levels of deprivation. The average number of new looked after children admitted to care each month has been reduced (from an average of 10.2 during 2015/16 to 8.8 during 2016/17), but there has also been a decrease in the rate at which children cease LAC resulting in an overall rise. Focus during 2017/18 will be on ensuring that where it is in the children's best interests there is a focus upon rehabilitation to home or moving into Special Guardianship Orders to reduce the number of looked after children whilst maintaining the threshold for admission to care.

The Board received an annual report on Corporate Parenting from the Head of Looked After Children, which detailed the ongoing areas of safeguarding in relation to looked after children, and activity to ensure children are being kept safe. Looked after children who enjoy stability in placements are more likely to do well at school, and are less likely to misuse alcohol and drugs, or fall victim to exploitation. The Board were therefore encouraged to hear that only 3.5% of looked after children had been in 3 or more placements in the last 12 months. This is well below the regional (10.9%) and national (10%) average.

During the 12 month period October 2015 to October 2016 there were a total of 106 missing episodes recorded which related to Herefordshire looked after children. Of these, 67 return from missing interviews were completed for Herefordshire's looked after children. All children are now offered a return interview. The direct work service has been responsible for completing all return from missing interviews and analysis from these interviews is shared with the operational child sexual exploitation and missing group.

The HSCB's CSE and Missing subgroup has continued to monitor and support this work, including the development of recording practices for children placed out of Herefordshire who go missing. Further, the work of the Board on producing a high quality risk assessment tool and practitioner guidance, and the forthcoming introduction of standard agendas and guidance for Risk Management Meetings contributes to better outcomes for looked after children who do go missing and/or are at risk of CSE as the understanding of the specific risks they face, and the planning to reduce those risks is robust.

The Board was also updated as to the number of looked after children who are engaged with the Youth Offending Service. It has been agreed that the Youth Offending Service will complete a more detailed analysis of offending within this small group so that an understanding of how a child's care status and offending behaviour are linked. The Board will take a particular interest in this work as the 'children living with domestic abuse' audit also showed a strong correlation between the perpetrators and their being previously involved with the Youth Offending Service.

The Children in Care Council has once again been very active in making sure that children and young people's voices are heard in relation to the services they receive, and the work of this group has taken a number of forms.

A young person in Local Authority care was given the opportunity to chair their own Looked After Child Review meetings. This came about after the point was made by one young person that they did not feel listened to, especially not in LAC Reviews. The feedback from this initiative has been very positive;

*"My Social Worker asked me if I wanted to chair my own Looked After Child Review. I did not know what this meant. My social worker is really supportive so she helped me to understand what I would need to do and what I did not need to do if I did not want to. The bit my social worker did which was the best was; she gave me a list to remind me what I wanted to talk about."*

*So then I chaired my own Looked After Child Review and it made me really happy! I felt in control of my life, I felt really powerful – you should all definitely give it a go! Be in charge of your life."*

As a result of this the Children in Care Council are arranged to hold 'U Chair' training to help children and young people in Herefordshire to understand their rights and get involved.

Finally, the hard work and commitment of all those involved with these children and young people is very clear from the feedback they have received;

*We want the world to know that we are...listened to!!!!*



You listen to us and make sure what we say makes a difference...

*"Thank you to Foster Carers for getting back to us, thank you for giving us information and making changes."*

*"Thank you for letting us know the information we gave you will be part of your finance policy and you will give us more information soon. But thank you for also letting us know that there will be changes to the support 16+ give."*

*"Thank you to Gill for coming to introduce herself and asking what we think."*

*"Thank you for letting us have a say in who we employ – sometimes we find it hard when we really like someone who you don't think is good enough. But we understand that you want the best for Herefordshire."*

*"Thank you for funding our new laptops – we finally have them and they are great. We have already drawn loads of pictures on them."*

*"We met some Cllrs at bowling and they listened to how we are interested in politics and how we would like for them to come to some of our meetings."*

During 2016/17 the Corporate Parenting Strategy has been reviewed and the Board has taken part in the consultation process. In 2017/18 the Board will be conducting a case file audit of safeguarding arrangements for looked after children in Herefordshire, and using the findings of that to further enhance the safeguarding of this vulnerable group of children and young people.

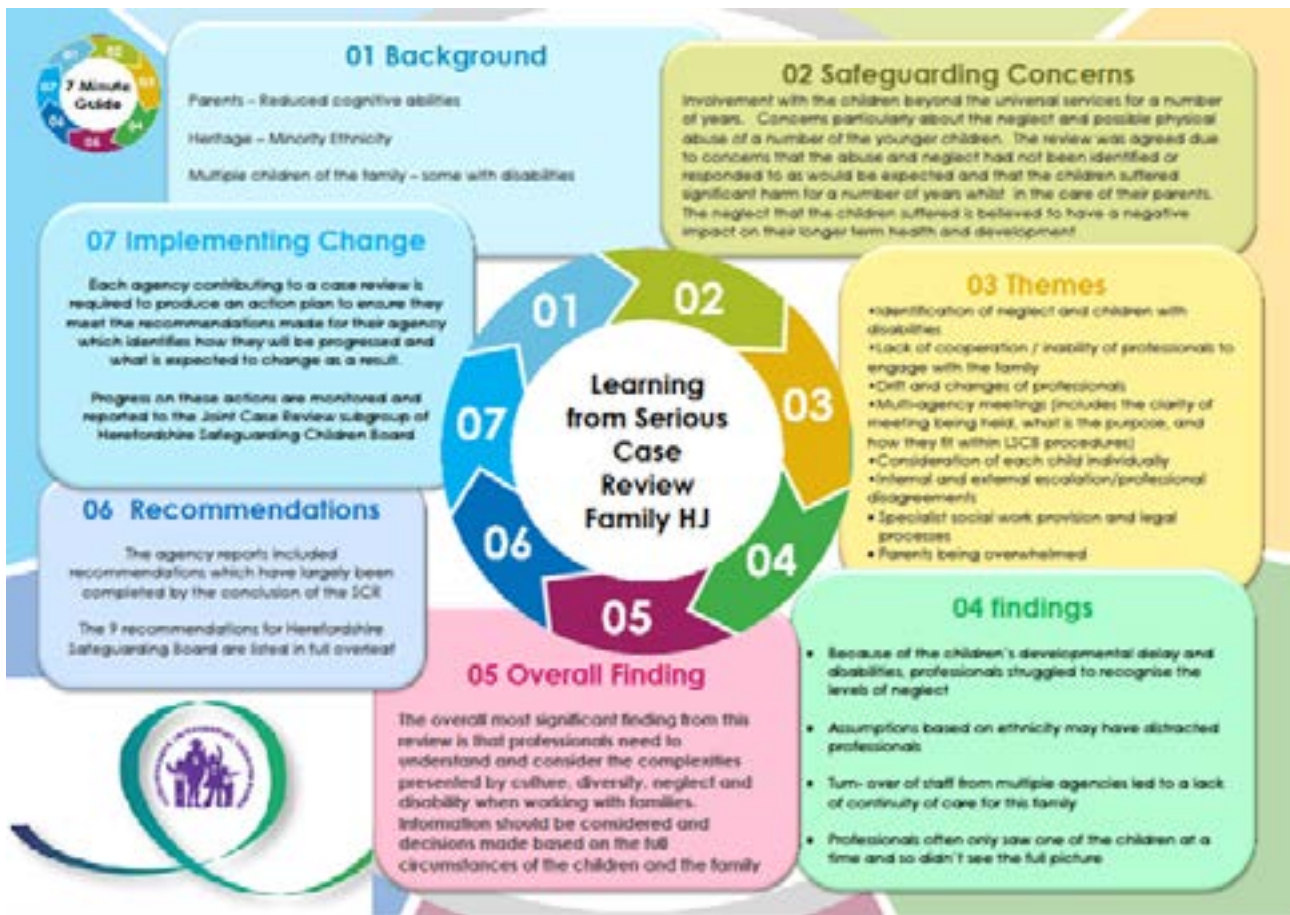
## e. Case reviews

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The Joint Case Review subgroup provides oversight to the commissioning and ongoing management of Serious Case Reviews, and other types of multi-agency reviews. LSCBs are required to undertake reviews of serious cases to determine and communicate lessons to be learned in order to improve practice. It makes recommendations to the HSCB Independent Chair on whether referred cases meet the criteria for a Serious Case Review or other type of review.

The HSCB published one Serious Case Review in 2016 (Family HJ), involving a minority ethnic family with multiple children, some with significant disabilities. The review was agreed due to concerns that abuse and neglect had not been identified or responded to as would be expected and that the children suffered significant harm for a number of years whilst in the care of their parents. A number of recommendations were made focusing on culturally competent practice, dealing with more complex parenting circumstances and risk management. The most significant finding from this review was that professionals need to understand and consider the complexities presented by culture, diversity, neglect and disability when working with families. Information should be considered and decisions made based on the full circumstances of the children and the family. An action plan was developed and its progress is monitored regularly at the JCR subgroup and reported to the Board.

Learning from the review has been delivered at multi-agency learning events and a practitioner forum in order to share the key lessons with practitioners. Further sessions will be held at the Designated Safeguarding Leads meetings. The HSCB also produced a "7 Minute Learning" guide, disseminated at the learning sessions and available on our website, which quickly identifies the key findings of the review. This type of learning guide is new to Herefordshire and was developed for use with this Serious Case Review, however as a tool to help promote learning it has received very positive feedback and the Board are keen to use it whenever appropriate in the future.



A Practice Learning Review (PLR) was also carried out in 2016/17. This is a new type of review for Herefordshire intended for cases that do not meet the criteria for a Serious Case Review, but where there is significant multi-agency learning to be gained.

This case considered a 'peer on peer' sexual assault, which was initially recorded as consensual. However, this was followed by a further allegation and conviction of a serious sexual assault of a much younger child whilst the young person was granted bail. The overriding theme from the PLR was that there was too much focus on the young person as a child with limited assessment of the risk that he posed as a sexual offender to other children. There were significant gaps in assessments and limited information sharing. Where information was shared, there was an assumption of action that was not clearly followed up to confirm it.

Discussions at the PLR evidenced that learning points had already been noted by participant agencies and that changes were being made to practice. An action plan was compiled and its progress is being regularly monitored by the JCR subgroup. The recommendations from this PLR included:

1. In cases where a child poses a risk to others, Children's Social Care to consider a process to assess Parent's/Guardian's ability to monitor and protect, as well as assess the risk a child presents, and any new information should trigger a re-assessment.  
*Action: The child and family single assessment was introduced in the autumn 2016 and training provided to all social workers to complement its implementation.*
2. Consideration needs to be given to how Police and Social Care can liaise to discuss the setting of bail conditions and the ongoing management of the individual to protect the public from further offending.  
*Action: Inter-agency communication in the MASH has developed since December 2016 and effective practice is embedded re discussions about the appropriate setting of bail conditions.*

3. Examine the current process for monitoring and oversight of complex cases to ensure information sharing is co-ordinated and appropriate.  
*Action: The complex abuse procedure has been recently reviewed in light of a separate, current complex investigation and this is operating effectively.*
4. Explore the possibility of providing a specialist resource for such cases.  
*Action: The Youth Offending Service has developed an in-house resource for direct work in youth justice cases.*

JCR subgroup has also considered the learning/themes from national serious case reviews and, as a consequence, HSCB held a case study session as part of a "Learning from Case Reviews" Practitioner Forum on Gloucestershire's SCR "Lucy".

A further 2 PLR's have recently been commissioned by the JCR subgroup. These will commence shortly and be reported on in the 2017-18 Annual Report. The first of these was put forward to the JCR as there were concerns around the likelihood of severe neglect of a child's developmental needs, which ended in the child being permanently removed from the parents care.

The second was put forward regarding concern that a child with disabilities experienced avoidable neglect and harm over a period of time that was unnecessarily long whilst remaining in the care of parents who were unable to meet the needs of the child.

Although neither of these cases met the threshold for a Serious Case Review, it was felt that there were learnings for agencies on how to effectively work together.

During 2016/17 HSCB worked with Herefordshire Safeguarding Adult Board to review the effectiveness of the Joint Case Review subgroup which was considering both child and adult referrals. This review highlighted the separating of the chairing responsibilities in respect of the business agenda for children and adult JCR held advantages, the demand on a single chair and the need for a clear definition between the adult and child processes and decision making were apparent.

It was also recognised that it would be beneficial for the chair of the adult section of the meeting to be a current Safeguarding Adult Board member with a strong knowledge of adult safeguarding.

As a result of this review the HSCB once again has a separate Case Review subgroup, albeit running consecutively with the Adult's Board equivalent.

## f. The Child Death Overview Panel (CDOP)

Chapter 5 of Working Together to Safeguard Children sets out the responsibilities of the Local Safeguarding Children Board "for ensuring that a review of each death of a child normally resident in the LSCB area is undertaken by a CDOP". The CDOP has a fixed core membership drawn from organisations represented on HSCB.

A total of 11 deaths occurred within the review period April 2016- March 2017, three of which are still awaiting completion of review.

There were 14 deaths signed off at the CDOP meetings within this review period, and these are the focus of the Annual Return to the Department for Education for Herefordshire. Of these 14 deaths, 9 of the reviews were completed in under 6 months, 3 in 6-7 months, with 2 taking between 8-9 months. The issue of delayed submission of some of the statutory form B's needed from agencies to enable the CDOP to complete the review has improved this year, however this continues to be monitored by the Business Unit and the Child Death Review meetings which take place in between the formal quarterly meetings.

Of the 14 deaths, 3 were reported as having modifiable factors.

CDOP considered the learning and actions arising from these, which have included:

- If women have had recent tests prior to review, these should be accessed and seen by maternity and obstetric staff. A review of medical notes at any assessment to gain information related to patient. A 10 point plan for triage has been put in practice. Learning has been disseminated across Obstetric Services through a safety brief and all Risk and Governance meetings, Perinatal and Morbidity and Mortality Meetings.

- Research into similar accidental deaths investigated within the regional CDOP's and by Police. Advice and guidance shared and discussed at CDOP.
- Recommendations for patients to refer to PAUSE. Pause works with women who have experienced, or are at risk of, repeat removals of children from their care. Through an intense programme of support, it aims to break this cycle and give women the opportunity to reflect, tackle destructive patterns of behaviour, and to develop new skills and responses that can help them create a more positive future.

There were no serious case review referrals made from CDOP during the year.

The Child Death Overview Panel provides an Annual Report to HSCB which contains more detailed information. It is available on the Board's website.

### g. Communication

The Board shares a Joint Communications subgroup with the Safeguarding Adult Board and Community Safety Partnership. The purpose of this subgroup is to ensure that all safeguarding communications across the partnerships are as coordinated and effective as possible. The subgroup is aware of the Board's priority areas and looks to ensure these are captured in communications. Importantly the group also share what each agency is doing on communications about particular topics so we can be more informed and coordinated about messages given to partners and the community. To develop this co-ordination further, the subgroup is now working closely with the One Herefordshire Strategic Communication and Engagement Group which is a forum led by the Herefordshire Clinical Commissioning Group.

During the year we have contacted parish magazines and requested that they include the following information within their publications. Whilst we cannot insist that they comply with this request we have had confirmation from most that it has been included.

## Herefordshire Safeguarding Boards

Everyone has a responsibility for safeguarding children, young people and adults at risk of harm. We can help you make sure you know what to do if you think that is happening.

It might be difficult to accept, but anyone can be hurt, put at risk of harm or abused, regardless of their age, gender, religion or ethnicity by either someone they know or a stranger.



If you are concerned about an adult ring  
01432 260715 (weekdays 9-5) OR

0330 123 9309 (at any other time)



If you are concerned about a child ring  
01432 260800

If someone is injured or in immediate  
danger dial 999

If there is no emergency but you think a  
crime may have been committed ring West  
Mercia Police on 0300 333 3000 or 101  
Abuse of any description is wrong and by  
reporting it you can help to bring it to  
an end.

If, as a member of the public or an  
organisation, you want more information  
about the work that the Safeguarding  
Boards do to keep children and adults that  
live and work in Herefordshire safe than  
please contact us on 01432 260100



## h. Allegations concerning persons who work with children

HSCB has in place safeguarding procedures which include comprehensive procedures to manage allegations against adults who are employed to work with children or who work with children in a voluntary capacity. These procedures are in line with other key statutory documents including the Department of Education statutory guidance, Keeping Children Safe in Education (2016).

The Local Authority Designated Officer (LADO) is responsible for the management and oversight of all investigations in to allegations against those working with children within Herefordshire. The LADO produces an annual report which is scrutinised by HSCB.

The duties of the LADO in relation to managing allegations are to:

- Manage individual cases
- Provide advice and guidance
- Liaise with the police and other agencies
- Monitor the progress of cases for timeliness, thoroughness and fairness

For 2016/17, 140 allegations against professionals were managed by the LADO, compared to 117 in 2015/16. The average number for the seven year period is 137, with 140 - 159 being the usual range for Herefordshire. The increase in referrals meeting the criteria this year compared to a decline over the previous 3 years may not be statistically significant, but could partially be attributed to an increased awareness of LADO procedures in 2016/17 following the rollout of LADO awareness sessions and the promotion of LADO procedures through the LADO Quick Guide.

*Working Together* 2015 sets the expectation that 80% of cases should be resolved within one month of referral, 90% within three months and all but the most exceptional cases within twelve months (measured as number of days from referral to case closure). It was recognised that in 2015/16 performance in relation to the timely progression and resolution of LADO referrals needed to improve, with only 25% of cases resolved within one month, 58% within three months and 42% of cases remaining open for more than three months during that year.

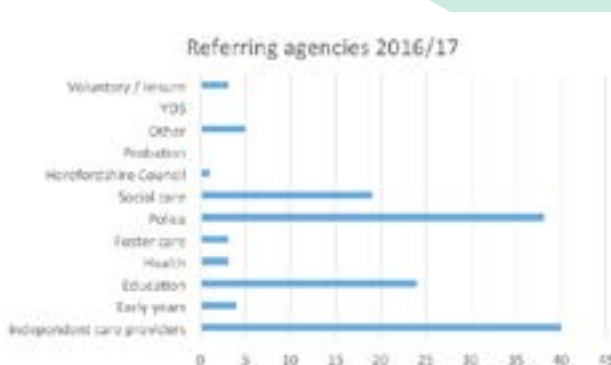
The data for 2016/17 shows that there has been significant improvement in performance:

73% of cases have been resolved within one month of referral

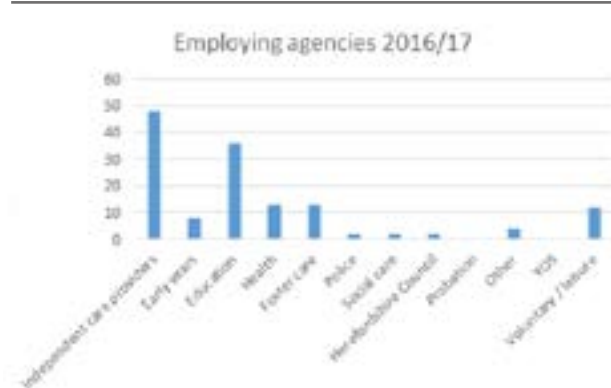
90% of cases have been resolve within three months of referral

As at 31st March 2016, 10 cases remained open awaiting the outcome of criminal proceedings or complex employee disciplinary proceedings.

### The graph below shows referring agencies to the LADO for 2016/17



### The graph below shows the employing agency 2016/17



Education, Police, Children's Social Care and Independent Care Providers continue make most LADO referrals. There has been an increase in LADO referrals from the police this year. This is a positive indication that the changes in police operational deployment have not had the potential negative impact on referrals that was referred to in last year's report.

Referrals from independent care providers have increased from last year. This increase is not due to inappropriate referrals. The outcome data shows that this sector has the highest proportion of substantiated allegations of any employment sector. LADO awareness training with this sector and the introduction of quarterly Residential Care Manager's forums have led to improved levels of communication and liaison with the LADO.

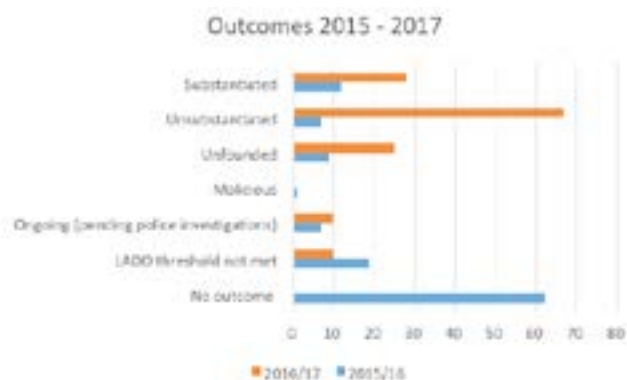
Children's Social Care has not significantly changed in the number of referrals made to the LADO over the past two years. The level of contact indicates a good understanding of procedures and a willingness to contact the LADO for discussion. Referral rates are still comparatively low, however, and continued awareness raising is required.

Youth offending services (YOS) were highlighted in last year's report for not having made any referrals or having an employee who is the subject of a referral. However, following the LADO delivering a session on LADO procedures to YOS staff, a referral was made and there are also reported to have been referrals made to Worcestershire LADO from this service in recent years, due to the YOS cross-county working arrangements.

Referrals from Fostering services have reduced by two thirds from 2015/16 to 2016/17. This has been explored with the service and is not due to a lack of LADO awareness among staff, evidenced by the referrals that have been made which demonstrate a good understanding of the procedures. This referral and consultation rate will continue to be monitored.

Health referrals have reduced this year and remain proportionately low given the size of the workforce. The Board will continue to monitor referral rates from this sector.

### The graph below shows the employing agency 2016/17



When the data is compared it highlights a disproportionate increase in the number of unsubstantiated allegations against professionals working for independent care providers. This is due to all allegations now having a recorded outcome. The percentage of cases that resulted in a substantiated allegation has not changed when the increase in referral numbers 2015/16-2017 is factored in.

### Review of LADO activity 2016/17

The LADO annual report 2015/16 proposed priorities and plans for the year as follows:

- Further develop internal recording processes and practice in relation to advice and consultation; recording of categories of harm and referral outcomes; and progression and timeliness of individual cases.

Internal recording processes now capture data on advice and consultation, overall referral rates including referrals that did not meet the LADO criteria, outcomes and categories of harm.

- Improve the timeliness of referrals being progressed and resolved, in line with Working Together guidelines, through a more robust chasing of investigation outcomes with employers and a monitoring tracker.

The timeliness of referral outcomes is now in line with Working Together guidelines.

- LADO awareness raising through briefings to key teams in social care and partner agencies, including the independent care sector and the police, and other agencies where referral rates indicate that this is required.

Awareness of LADO procedures has been raised this year through a new LADO Quick Guide which provides key information on the LADO criteria and referral process, new LADO training material has been incorporated into the HSCB Initial Multi-Agency Safeguarding Course, and the LADO has delivered extensive training and awareness sessions across the partnership.

Priorities for 2017/18 include:

- Make further improvements to the electronic recording system;
- Develop an information and advice leaflet for professionals who have allegations made against them;
- Continue to raise awareness of the role of the LADO and the importance of referring concerns;
- Develop a risk assessment template to help with decision making when a professional has had an allegation made against them;
- Revise LADO procedures to include clear criteria for when an allegations management meeting should be held.

Board members will be supporting these priorities by continuing to promote knowledge of the LADO role and processes within their organisations, and the need for timely progression of individual cases.



## 7. Effectiveness of agency safeguarding arrangements in Herefordshire

Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to safeguard and promote the welfare of children. LSCBs have a responsibility to monitor how effectively they do this. HSCB monitors a range of performance information and carries out various quality assurance activities to establish the effectiveness of local services. This work is set out in the Board's Learning and Improvement Framework and is primarily coordinated through the Quality Assurance and Performance (QA) subgroup. Case reviews in respect of both children and vulnerable adults are coordinated by the Joint Case Review (JCR) subgroup, and details about this are given elsewhere in this report.

Quality Assurance activities include:

- Review of external inspections of Herefordshire services and oversight of the delivery and impact of action plans;
- Discussion and analysis of a multi-agency core data set quarterly;
- Production of thematic scorecards for each of the Board's priorities to inform and complement audit activity;
- Multi-agency case audits based on board priorities or emerging trends and themes as identified by the group;

- Discussion of emerging local issues and trends arising from the data and identification of areas of strategic importance, which are reported to the LSCB for direction or further work;
- Co-ordination and analysis of the statutory 'section 11' audit of single agency contributions to safeguarding children.

A learning log has been created to capture the learning from case audits and Serious Case Reviews and is used regularly to inform training and forward planning.

Practitioners and first line managers have been actively involved in the multi-agency case audits and this allows for a much richer discussion and exchange of views and understanding that leads to better learning.

In the coming year the group will work within the five board priorities, but with the ability to look at other themes and issues if deemed appropriate, an example of which was the recent paper on youth homelessness. There will be a quarterly balanced scorecard for each thematic audit.

## Section 11 audit

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The HSCB conducted a full Section 11 audit with partners in 2015/16, and the next audit is due in 2017/18. As such there has been no full audit conducted this year. In order to quality assure agency self-assessments, a panel of members of the Herefordshire Safeguarding Children Board invited partners to present on how they had addressed areas for development identified within their own Section 11 audits.

The Board has during this period also been actively working with other LSCBs across the West Midlands Region to develop a standardised regional Section 11 audit tool, which will be trialled in Herefordshire in October 2017.

## Single Agency Assurance Reporting

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Throughout the year, the Board received assurance reports from the various agencies that have safeguarding responsibilities within Herefordshire. This helped the Board to assure itself of the effectiveness of single agency arrangements, and also provided partners on the Board with an opportunity to identify emerging themes, and where appropriate challenge the work of that agency. Some of the highlights from these reports are set out below.

In July 2016 **West Mercia Police** increased both the number of specialist Child Abuse Investigators and the coverage they provide. Detectives trained in specialist child abuse investigation moved to seven day working, and with availability from 0800hrs to 2300hrs. This means that children and young people who report serious cases of abuse receive a response from an appropriately qualified investigator, so ensuring the child gets the best possible response at the earliest point.

Where children are involved in the life of an offender, The **National Probation Service (NPS)** makes sure that any necessary actions required to keep the child safe are included in the offender's risk management plan. Child safeguarding issues are addressed directly with offenders in supervision sessions, and child safeguarding is also reinforced by programme facilitators where the offender is participating in domestic violence or sex offender group work programmes. These measures place the child firmly at the centre of the planning done by the NPS to manage offenders' behaviour.

The Warwickshire and West Mercia Community Rehabilitation Company (WWM CRC) has undergone significant changes since the Transforming Rehabilitation Programme in June 2015. During these changes however, the WWM CRC has been able to retain its commitment to safeguarding children. All of its staff are appropriately trained in safeguarding children. The WWM CRC also actively audits cases to identify where safeguarding can be improved; this, for example, has highlighted that where a children's services check is returned that has different information to that in the previously completed risk assessment, a review should be completed by the offender manager. This ensures that the child involved is kept at the centre of the risk assessment process, and professionals are regularly considering their safety, so problems or concerns can be tackled sooner. Earlier intervention gives the best possible opportunity to prevent children and young people coming to significant harm.

Within the Health sector, all of the organisations involved have very strong safeguarding training programmes for their staff, which are closely monitored. This means that children and young people who have contact with health services in Herefordshire and are in need of safeguarding have the best possible chance of having their needs recognised and responded to in the correct manner. Within the Child and Adolescent Mental Health Service, safeguarding supervision is included as an agenda item for all team meetings and for individual operational/professional supervision. This is particularly reassuring as the work of the Board's CSE and Missing subgroup has highlighted how vulnerable to exploitation children and young people with mental health problems are.

In June 2014 the **Wye Valley NHS Trust (WVT)** received a rating of 'inadequate' following a Care Quality Commission (CQC) inspection. Since this time significant improvements have been made, and in July 2016 a follow up inspection rated "Are Services Safe?" as 'good', so reflecting the hard work of all involved. The inspectors found that staff across the trust had an understanding of their roles and responsibilities and the types of concerns that may indicate that a child safeguarding referral was required. They understood the referral process and knew how to make referrals. The work of the Young Ambassador group was acknowledged as excellent, noting their input into service re-design and the current project of involvement in the making a film on transitional care for national distribution. The inspectors found that staff listened to and respected their opinions and that they saw the services provided "through the eyes of the children and young people". It is reassuring that within Herefordshire young people are getting the opportunity to influence so directly the development of services that are there for them.

Within Education, the tracking of children missing from education has been increasingly successful, meaning fewer children are at risk of being out of contact with agencies who can recognise when support or safeguarding is needed.



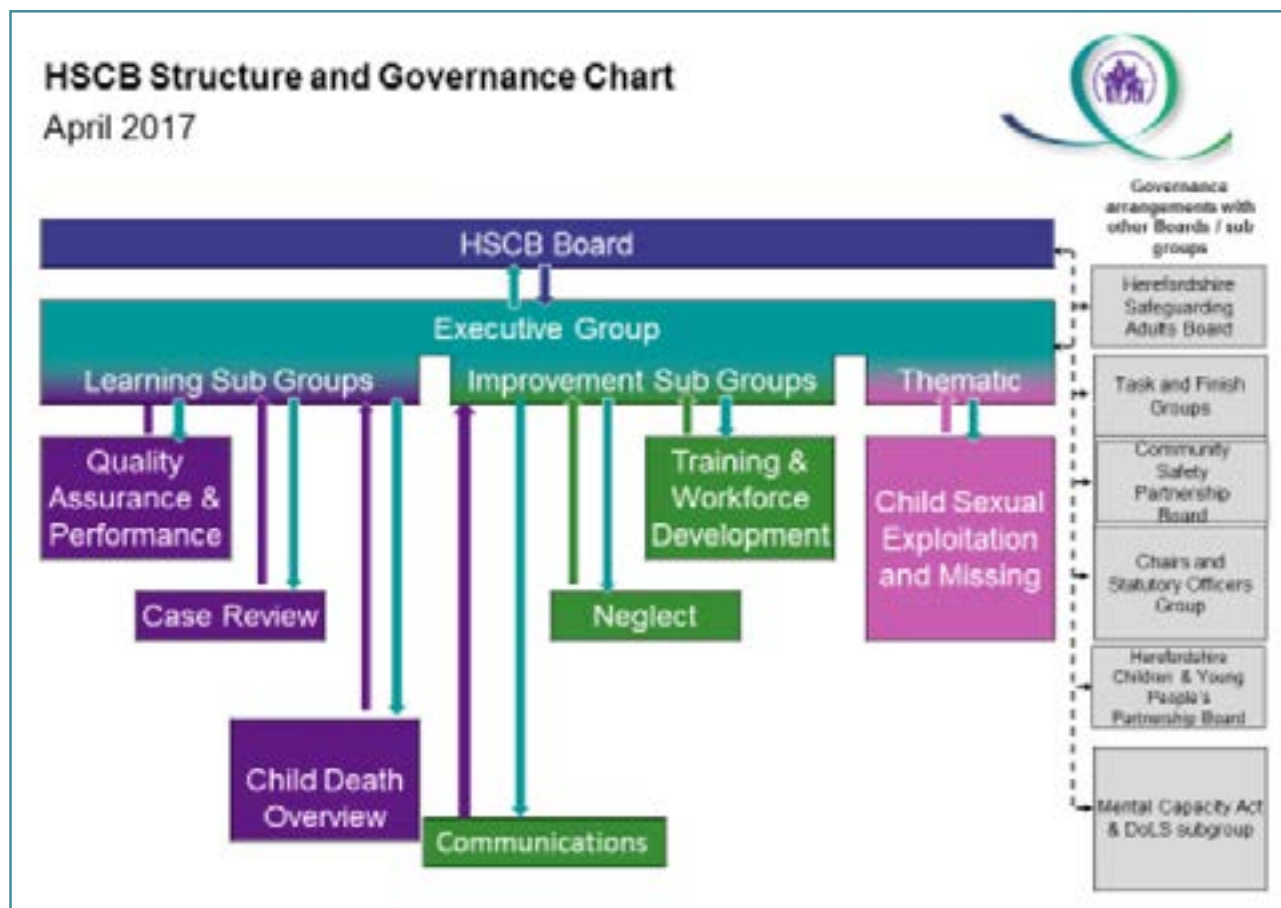
# 8. Development of HSCB and its effectiveness 2016-17

HSCB carries out its work primarily through its subgroups, supplemented by task and finish groups as required, and through scrutiny and challenge at Board meetings.

The Board also works with other multi-agency partnerships across Herefordshire to both scrutinise and challenge their activities and to pursue joint objectives. The forum that was established in 2015 to bring together the Chairs of the two safeguarding boards (adults and children), the Health and Well Being Board, the Children and Young Peoples Partnership and the Community Safety Partnership, has continued to develop and as the Safeguarding Chairs and Statutory Officer's Group now meets

quarterly to discuss cross cutting matters for the various partnership boards and importantly make joint decisions on such matters as ownership and responsibility for emerging safeguarding concerns within Herefordshire. A recent example of this is the use of this forum to discuss and decide where responsibility for addressing the risks of human trafficking and forced marriage should sit (Community Safety Partnership delivery groups), with safeguarding boards continuing to assure themselves of the effectiveness of that response.

The structure and governance arrangements for HSCB are set out below.



The attendance of partners at the HSCB Board meeting is set out in **appendix 1**.

Overall engagement by partners in the work of the HSCB has continued to be positive throughout 2016-17. Member reviews with the Independent Chair have ensured that agency representatives understand their role and responsibilities as Board members. There have been occasions through this period when subgroups have not been quorate, however these have been reported to the HSCB Executive when they have occurred, and addressed within that group. There have been particular challenges within the Joint Communications subgroup, primarily due to changes in partners' communications team arrangements and the wide demands on this relatively small group of practitioners. To address this, the HSCB has worked with the Safeguarding Adult Board and the One Herefordshire Strategic Communication and Engagement Group, which is a separate communications group within the county but with similar attendance and partnership coverage to align the work of the two subgroups to reduce the impact on partnership resources, whilst strengthening joint working and expanding the opportunity to share safeguarding information.

Towards the end of 2015/16 the Board also reviewed the effectiveness of its Executive Group arrangements, and as a result of this streamlined this group to consist primarily of the subgroup chairs, with partners being invited to attend to address specific topic. The Board has continued to use this arrangement throughout 2016/17 and this has helped the Board to conduct its business more efficiently, and is now making best use of partners' valuable time.

HSCB has continued to benefit from a joint Business Unit arrangement, which is now in its second year. As well as supporting the HSCB, this unit also supports the Safeguarding Adults Board and the Community Safety Partnership. This is jointly funded by partners, and details of the budget, contributions and expenditure are included in **appendix 2**.

The Unit consists of:

- Business Unit Manager
- Learning and Development Officers X 3
- Business Support Coordinator X 3



Each of the Learning and Development officers takes lead responsibility for one of the partnership boards and for particular areas that allow for cross cutting themes and shared work streams.

The Business Unit is also supported by a commissioned training resource, but in order to make best use of the funding available, has now reduced that support by returning the administration of the on line training provision to the Business Support Coordinators.

Although one of our lay members decided to step down from the Board during the year, the Board has continued to receive excellent support from the remaining lay member, who regularly attends the meetings, provides a community voice, has been involved in our work to develop a more effective approach to ensuring the Board's work is informed by children's views, and has also taken part in the reviews of the Section 11 audits and how agencies have developed the safeguarding arrangements as a result of those.

## Illustrations of HSCB work, challenge and impact

Throughout this annual report there are details of the work of all partners in safeguarding children, and the Board's function in seeking assurance that partners are working effectively together. Examples of this activity are summarised below:

### Challenge

Report of very low numbers of young people in 'staying put' placement at age 18+ in Herefordshire.

A number of agencies were written to by the Chair challenging their lack of regular attendance at Board meetings.

Continued difficulty in obtaining Form B responses to child deaths in a timely fashion from several agencies.

Challenge to Addaction on lack of provision and suitable premises for young people, and safeguarding of children/young people in care of service users.

### Impact

Reassurance report received from Director of Children's Services clarifying the number of young people using such arrangements and demonstrating appropriate provision and take-up within the county, so ensuring young people have the opportunity to choose to 'stay put' should they wish to do so.

Regular attendance now secured from those agencies. This ensures the Board makes decisions with full information available, so ensuring those decisions are likely to have the best possible impact on safeguarding children and young people.

The SUDIC paediatrician and the Chair of CDOP have written and spoken to professionals. The CDOP has considered the learning from this and have recommended the following:

- Professionals are made aware of their role through the development of a pathway which is on the LSCB website.
- A good practice guide and sample is posted on the web to assist with understanding.
- The Director of Children Services, as the accountable officer has been alerted to take the appropriate action.
- A communication item on the CDOP agenda to agree dissemination of learning, with responsibility for this to the HSCB Communications Subgroup.

In securing more timely submission of information, opportunities to prevent SUDIC can be taken soonest, so improving the safeguarding of children.

Children and young people who are living with parents with drug or alcohol issues, or have such issues of their own, are correctly identified as being more likely to need early help as a result, and where necessary those children and young people are given access to that help at the correct level and by the most appropriate agencies.



## Challenge

Improving the response to victims of 'peer on peer' abuse.

In relation to CSE/Missing Children, members of the executive questioned the availability of guidance for Risk Management meetings. The executive also explored whether the Risk Management meetings are subject to quality assurance.

Following identification of high numbers of children subject of child protection plans, the Board developed and promoted multi-agency guidance on applying the significant harm threshold, along with levels of need guidance.

Findings from a Serious Case review led the HSCB to request the Early Help services and other safeguarding process to consider the whole family approach in their planning and service delivery.

Through its work the HSCB became aware of issues in specific cases and raised these with relevant partners.

Findings from a practice learning review impacted in a number of ways in relation to multi agency working and services for children and families.

## Impact

HSCB has taken the lead for reviewing the regional 'Children who abuse others' procedure, ensuring the new procedure is developed with input from all relevant agencies. This will ensure children and young people who are victims of abuse by their peers are better protected through a more robust response by professionals.

Children's Social Care now have a Risk Management Practice Guidance, along with Risk Management Meeting Guidance and Agenda, which now sit within the suite of CSE procedures. This ensures children and young people who may be at risk of CSE are correctly identified and interventions that will most effectively protect them are agreed by partners, and implemented.

This supported partner agencies and IRO's in focusing on those children, who most needed support through safeguarding, and improving the services and outcomes for children and young people subject to a child protection plan, while reducing the numbers of children subject to child protection plans.

Herefordshire's Early Help strategy that has been endorsed by the HSCB, Health and Well Being Board and Children and Young Peoples Partnership reinforces the "whole family approach".

Opportunities were identified to provide further help to two young people in a family that made a significant difference.

From the experience of a case involving travelling families the board developed awareness sessions for practitioners in order to raise understanding of the experiences of travelling families.

Improved inter agency communication in the MASH.

The Youth Offending Service developed in house resource for direct work in youth justice cases.

## 9. Conclusion and future priorities

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Evidence from the Board's quality assurance activities indicates that services to safeguard children in Herefordshire and promote their wellbeing continue to improve, but need to become more consistently good.

During 2016/17 the Board has been very active in promoting the effectiveness of child safeguarding arrangements in Herefordshire through the work of Board members and its subgroups. It has also achieved notable success in influencing the work of other partnership forums in the county towards giving greater focus to safeguarding children in the county. Through engagement with the Herefordshire Community Safety Partnership that forum now has a priority for 2017 – 2020 of reducing sexual offending against children, whilst the Herefordshire Health and Wellbeing Board is now prioritising the dental health of children.

As a result of the work undertaken by the Board during 2016/17, we now have a much stronger understanding of the profile of CSE in Herefordshire. We have up to date tools and pathways to deal with reports of CSE, and have improved the quality of awareness and training to multi-agency partners on how to recognise and address the threat of CSE. In the coming year the Board will be focusing on assuring itself of the effectiveness of risk management planning in relation to individual children and young people at risk of CSE, and the support services available to victims of CSE. This will be achieved in a number of ways, including the delivery of the revised strategy and delivery plan, with audit activity to check that this has the impact intended on services. The Board also recognises that there is a relatively high rate of recording of sexual crimes against children in Herefordshire, and we need to understand why that is and how such offending can be better prevented. The Board will be supporting the Herefordshire Community Safety Partnership in achieving this.

In addition, the Board has had the opportunity to consider the extensive research that was commissioned from the Local Authority's Strategic Intelligence Team in relation to Child Sexual Exploitation and sexual offending against children and young people, and has as a result updated its priorities to reflect this. The priorities have also been simplified to ensure they are clear and easily understood.

As a result of the work of partners and challenges raised within the Board, the HSCB recognises that the collective response to 'peer on peer' abuse requires a greater focus and this will be provided through 2017/18.

A sustained reduction in the number of children subject of child protection plans has been achieved. This reduction has meant that professionals have more time to respond effectively to those children who are subject of a plan while other families are supported through the children in need process. Further checking has assured the Board that this reduction has been achieved safely, and without children being put at risk of significant harm.

Board members have made an active contribution to further developing the quality of child protection conferences in Herefordshire, and work will continue to ensure those developments are well embedded. Audit work has shown that within the child protection system there is high quality direct work taking place which clearly leads to improved outcomes for children and their families, including the child's voice being clearly evident, and the demonstration of good communication across agencies. There is strong evidence of statutory child protection meetings being well attended and resulting responses and actions being timely. That said, the Board remains cognisant of the need to ensure continued focus on the quality of supervision of practitioners and continuity of staff within agencies as a vital part of effective safeguarding procedures.

In reviewing progress against the 2016/18 priorities, the Board recognised that greater impetus is now required to improve the response to tackling childhood neglect, and this is the key priority for the coming 12 months. Although progress has been made during 2016/17, it is clear that real and sustainable change across the partnership in how neglect is identified and responded to must be achieved. As such the Board will be investing considerable resources in introducing new ways of working, and providing practitioners with the skills to take full advantage of those.

In addition, in recognition of their particular vulnerabilities, the Board will be paying particular attention to assuring the effectiveness of the arrangements to safeguard children with disabilities within Herefordshire, and supporting improvements where necessary.

The Board has continued to work towards ensuring that the Levels of Need supports the delivery of the Early Help Strategy within Herefordshire. The coming year will see the further development of early help services, and it is important that the Board supports that work and the work of the Children and Young Person's Partnership in ensuring that the workforce is sufficiently prepared for the shift of emphasis towards early help.

Reflecting on the achievements of the Board through 2016-2017, and using a range of sources of information which have included inspections, self-assessments, learning from reviews and consultation with our partners in Herefordshire highlighting areas where development is required, the Board has set five priorities for 2017 – 2019:

Priority 1: Neglect.

Priority 2: Child Sexual Abuse and Exploitation (including children who go missing).

Priority 3: Safeguarding Vulnerable Children.

Priority 4: Early Help.

Priority 5: Strong Leadership, strong partnership.

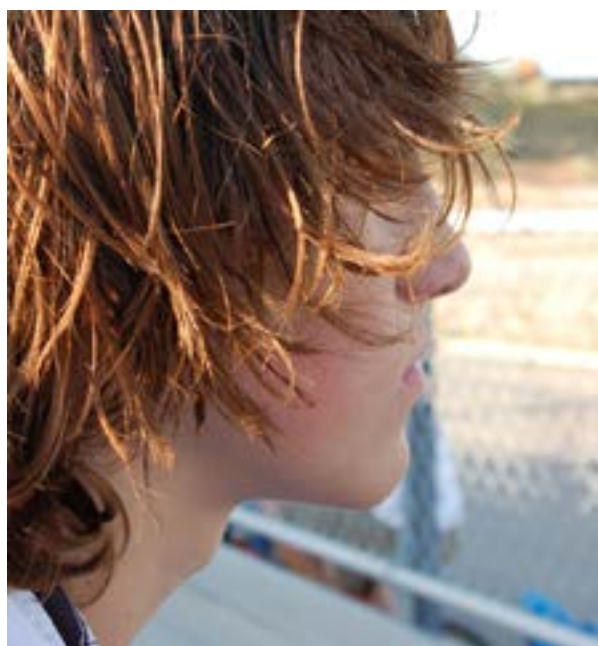
Priority five has been added as the Board recognises that as recent legislative changes create opportunities for a review of safeguarding structures, must continue to deliver strong leadership and retain strong partnership working to ensure the best possible arrangements remain in place to safeguard children and young people.

These priorities also reflect those of the Health and Wellbeing Board (Priority 3 addresses the importance of keeping children safe), and the Children and Young People's Partnership. Priority 4 of the Children and Young People's Plan is "Children and young people in need of safeguarding", and includes expectations in relation to effective early intervention, identifying children at risk of sexual exploitation, a reduction in the number of children subject of a child protection plan and looked after, and support for children with enduring needs particularly in relation to transition in to adult life. Early help is also a key priority within the Children and Young People's Plan. In addition Priority 2 supports the Herefordshire Community Safety Partnership priority of 'Reducing sexual crimes against children'.

The full **Children and Young Peoples Plan** can be found here.

It is the intention of the Board during the coming year to concentrate on these and other areas where we can make a real difference to the safety and development of children and young people in Herefordshire by promoting and ensuring efficient and effective practice.

The actions against each of the priorities in the plan below have been identified following a recent review of our progress during the past twelve months, and are designed to deliver the improvements as set out above. Further, all contribute to achieving our vision, and fulfilling our statutory responsibilities of the board to coordinate and ensure the effectiveness of safeguarding arrangements in Herefordshire.



## Strategic Priority

## Outcome

## We will do this by;

### 1. Neglect.

Early identification and response to childhood neglect, and it is prevented whenever possible.

Appropriate, consistent and timely responses across all agencies working together.

A clear focus on the impact of neglect on the child or young person.

- 1.1. Implementing the childhood neglect strategy and action plan.
- 1.2. Delivering a launch event for the HSCB childhood neglect strategy and associated changes to business practice.
- 1.3. Delivering high quality multi-agency neglect training, to include use of common assessment tool and shared understanding of Levels of Need in relation to childhood neglect.
- 1.4. Evaluating the effectiveness of that training.
- 1.5. Assessing the effectiveness of the use of the assessment tool, and the extent of the understanding of neglect between partner agencies against JTAI standards.
- 1.6. Ensuring the learning from previous SCR's and PLR's is properly embedded.
- 1.7. Ensuring a particular focus on the effectiveness of services to prevent the neglect of children with disabilities.

### 2. Child Sexual Abuse/ Exploitation & children who go missing.

Children who are vulnerable to sexual abuse and/ or exploitation are effectively identified, safeguarded and supported.

- 2.1. Ensuring the delivery of the CSE and Missing strategy and action plan.
- 2.2. Assessing the effectiveness of support services for victims of CSE in Herefordshire, and influencing commissioning of those services.
- 2.3. Ensuring a coordinated response with Community Safety Partnership to reducing sexual abuse of children.
- 2.4. Gaining assurance of the effectiveness of risk management planning in relation to individual children and young people at risk of CSE within risk management meetings.
- 2.5. Gaining assurance on the arrangements for and frequency of missing children interviews.
- 2.6. Supporting ongoing local and national CSE awareness campaigns and improving knowledge and understanding of CSE toolkit within agencies in Herefordshire.
- 2.7. Reviewing the 'Children who abuse others' procedure and ensuring appropriate guidance is available to practitioners within Herefordshire.
- 2.8. Checking the effectiveness of the response to previous CSE audit findings, the quality and availability of post abuse support to victims of CSE and the quality of intelligence relating to CSE, and the effectiveness of its sharing and use.

3. Safeguarding vulnerable children.

Vulnerable children are identified and safeguarded, and their wellbeing promoted.

- 3.1. Maintaining up to date LSCB procedures that align with regional arrangements and statutory guidance to inform the journey of the child through the child protection process.
- 3.2. Developing the focus on 'hidden harm' and the increased risk to children with disabilities within multi-agency training.
- 3.3. Using multi-agency performance data to ensure the effectiveness of local safeguarding practice, specifically the application of LSCB thresholds, and the quality of child protection plans.
- 3.4. Ensuring learning from SCR's and PLR's is appropriately used to improve the journey of the child through the child protection process.
- 3.5. Securing feedback from children and young people who are subject to a child protection plan or who are looked after, to understand the effectiveness of the local safeguarding system.

4. Early Help

Children and their families receive effective help at the right time which promotes their wellbeing.

- 4.1. Ensuring LSCB procedures address the impact 'hidden harm' has on children and young people, for example children living with substance misuse and domestic abuse within the family.
- 4.2. Assessing the impact of threshold decisions on those children who are not stepped up to higher levels of intervention.
- 4.3. Ensuring that the HSCB procedures support the early help strategy.
- 4.4. Evaluating the availability and effectiveness of early help support, particularly in relation to children living with neglect and domestic abuse, and children with disabilities.
- 4.5. Working with the Children and Young Person's Partnership to ensure LSCB training products promote understanding of the early help offer with practitioners, to include overhaul of working together training sessions, and use of evaluation process to monitor effectiveness.
- 4.6. Assessing the quality, effectiveness and availability of early help support and interventions in relation to those families where childhood neglect is a risk or present.
- 4.7. Securing feedback from children, young people and their parents/carers about their experience of accessing and receiving early help (including Families First).

5. Strong leadership, strong partnership.

HSCB leads the safeguarding agenda, challenges the safeguarding work of partner organisations, and commits to an approach that learns lessons and embeds good practice. The partnership has effective plans in place for maintaining the effectiveness of safeguarding in the future.

- 5.1. working with partners to deliver successfully against the Business Plan and associated work plans set for HSCB and its subgroups / working groups
- 5.2. continuing to strengthen the governance interface between HSCB and other key strategic forums
- 5.3. communicating and raising awareness about safeguarding to individuals, organisations and communities
- 5.4. maintaining HSCB's Learning & Improvement Framework, facilitating, promoting and embedding learning from evidenced based practice, including SCRs and local learning reviews, and assessing impact of learning activity
- 5.5. scrutinising and challenging the individual and collective performance of partner organisations in safeguarding and improving outcomes for children, particularly those who are most vulnerable
- 5.6. engaging with children, young people and families to capture their views and experiences, influence the partnership's work and evaluate the impact of partner activity on their outcomes
- 5.7. engaging with practitioners to ensure they are supported to work effectively with children and their families.

The HSCB will continue to seek assurance from partners of improving services and positive outcomes for children through audits, review and reporting. The HSCB will have a reporting cycle that includes detailed reports on one of the priority areas each quarter, using a focused scorecard, with exception reporting on any issues identified through the Quality Assurance and Performance subgroup of the HSCB. Along with this reporting there will be findings from multi-agency case audits set around the priority areas, together with data and qualitative information from other areas including:

- Single agency audit activity, findings, analysis and actions
- Board members observations of Child Protection Case Conferences
- Board members visits to front line services
- Audit of agencies responses to identified actions to improve safeguarding practice through Sec 11 Children Act 2004, Sec 175/157 Education Act 2002 audits.



In addition, the HSCB will be seeking reports and assurances from partner agencies about other safeguarding children matters throughout the year. These will include:

### Safeguarding area

Looked after children

Female genital mutilation (FGM)

Prevention of radicalization and extremism

Health Services assurance reporting

Public Protection assurance reporting

Education assurance reporting

Child Death Reviews

Serious Case Reviews and other case reviews that the Board have identified should take place

Private Fostering

Adult Factors that impact upon the safety and wellbeing of children



# Appendix 1

Attendance of agencies at HSCB Board meetings 2016-17\*

| Agency / person                                 | Board meeting<br>25/4/16 | Board meeting<br>25/7/16 | Board meeting<br>17/10/16 | Board meeting<br>25/1/17 |
|---|--------------------------|--------------------------|---------------------------|--------------------------|
| Independent Chair                               | •                        | •                        |                           | •                        |
| Lay Member 1                                    | •                        | •                        | •                         | •                        |
| Lay Member 2                                    | •                        | •                        |                           |                          |
| HC Children's Wellbeing                         | •                        | •                        | •                         | •                        |
| HC Adult Safeguarding                           |                          |                          | •                         |                          |
| 2Gether NHS Trust                               | •                        | •                        | •                         | •                        |
| Wye Valley Trust (WVT)                          | •                        | •                        | •                         | •                        |
| Clinical commissioning Group (CCG)              | •                        | •                        | •                         | •                        |
| National Probation Service                      | •                        |                          | •                         | •                        |
| Youth Offending Service / Youth Justice Service | •                        | •                        | •                         | •                        |
| Community Rehabilitation Company (CRC)          |                          |                          | •                         | •                        |
| West Mercia Police                              | •                        | •                        | •                         | •                        |
| CAFCASS   | •                        |                          |                           |                          |
| Lead Member Children's Well Being               | •                        | •                        |                           |                          |
| Education representative                        | •                        | •                        | •                         | •                        |
| Voluntary and community representative          | •                        | •                        |                           |                          |

\* In most instances agencies are represented by more than one person from an organisation. Herefordshire Council (HC) representation has included the Director and Assistant Director of Children's Well Being; Head of Additional Needs; Head of Quality and Review; Public Health; Health representation has included Head of Safeguarding CCG; Designated Doctor CCG; Deputy Director of Nursing 2Gether Trust; Director of Nursing and Quality WVT; Executive Nurse Quality and Safety CCG; Director of Nursing Taurus; Designated Nurse WVT. Education representatives have included representatives from the Early Years sector, Primary Schools, Secondary Schools, Special Schools and FE Colleges.



# Appendix 2

## Partnership Boards budget\*

### Agreed budget for 2016/17

|                           |                |
|---------------------------|----------------|
| Children's Wellbeing      | 130,017        |
| Adults Wellbeing          | 103,000        |
| Other Council Dept        | 7,365          |
| CCG                       | 80,190         |
| Police                    | 53,510         |
| Probation                 | 6,136          |
| CAFCASS                   | 550            |
| YOS                       | 1,144          |
| <b>TOTAL BUDGET GROSS</b> | <b>374,547</b> |



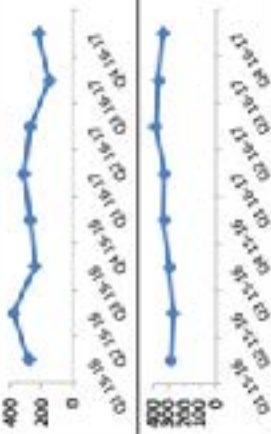
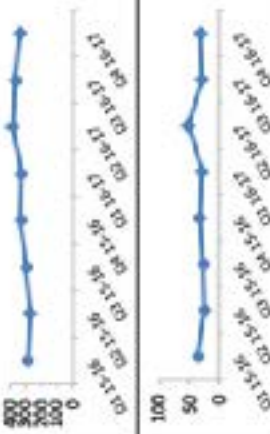
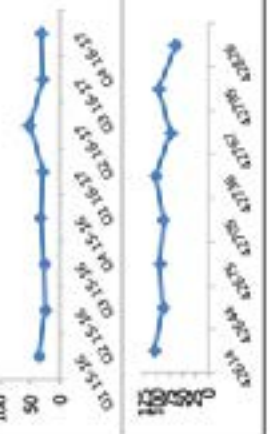
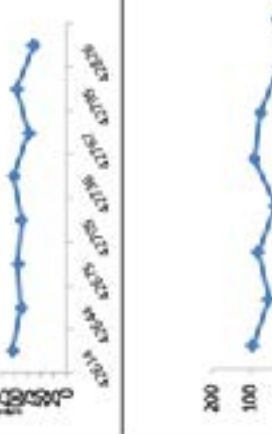

### Final 2016-17 Expenditure statement

| Category                  | Actual spend to date | Notes and comments  |
|---------------------------|----------------------|---|
| Salary Costs              | 242,116              |   |
| Agency staff costs        | 37,195               | Costs of Serious Case Review chair included within this.                    |
| Transport costs           | 673                  |   |
| Independent chair costs   | 36,960               |   |
| Serious Case Review costs | 1,111                |   |
| Training expenses         | 27,675               |   |
| Office expenses           | 58,474               |   |
| Training income           | -3,455               | Includes end of year recharges for council back office services of £32,000. |
| Additional income         | -33,700              | Funding from CCG for MCA training and tools + PCC income.                   |
| <b>TOTAL</b>              | <b>367,048</b>       |   |

\*Note: this budget also covers the support of the Herefordshire Safeguarding Adults Board and the Community Safety Partnership

# Appendix 3

Children exposed to domestic abuse (MARAC data)

|  |   |          |     |          |     |          |     |          |     |          |     |          |     |          |     |          |     |      |   |                   |
|--|---|----------|-----|----------|-----|----------|-----|----------|-----|----------|-----|----------|-----|----------|-----|----------|-----|------|---|-------------------|
| Number of unique children - quarterly totals                           | West Mercia Womens Aid                          | Q1 15-16 | 284 | Q2 15-16 | 376 | Q3 15-16 | 243 | Q4 15-16 | 273 | Q1 16-17 | 314 | Q2 16-17 | 271 | Q3 16-17 | 149 | Q4 16-17 | 218 | 46%  |    | Smaller is better |
|  | West Mercia Police                              | Q1 15-16 | 287 | Q2 15-16 | 270 | Q3 15-16 | 298 | Q4 15-16 | 330 | Q1 16-17 | 327 | Q2 16-17 | 385 | Q3 16-17 | 367 | Q4 16-17 | 339 | -8%  |    | Smaller is better |
| Number of children exposed to DA three or more times                   | West Mercia Police                              | Q1 15-16 | 35  | Q2 15-16 | 24  | Q3 15-16 | 26  | Q4 15-16 | 32  | Q1 16-17 | 29  | Q2 16-17 | 51  | Q3 16-17 | 29  | Q4 16-17 | 31  | 7%   |    | Smaller is better |
|  | West Mercia Police                              | Sep-16   | 104 | Oct-16   | 88  | Nov-16   | 94  | Dec-16   | 86  | Jan-17   | 102 | Feb-17   | 73  | Mar-17   | 96  | Apr-17   | 63  | -34% |   | Smaller is better |
| Number of children exposed to DA as recorded by Children's Social Care | Herefordshire Council Children's Social Service | Q1 15-16 | 93  | Q2 15-16 | 50  | Q3 15-16 | 79  | Q4 15-16 | 32  | Q1 16-17 | 89  | Q2 16-17 | 71  | Q3 16-17 | 20  | Q4 16-17 | 25  | 25%  |  |                   |

# Appendix 4

Numbers of children and young people involved with Children's Independent Domestic Violence Adviser 2016-17

| 17. IDVA SERVICE USER CHILDREN DATA                                       |           |           |           |           |           |           |           |           |           |           |           |           |            |
|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------------|
|   | Apr       | May       | June      | July      | Aug       | Sept      | Oct       | Nov       | Dec       | Jan       | Feb       | Mar       | Total      |
| No. of service user children recorded at the end of previous period       | 13        | 19        | 19        | 23        | 21        | 21        | 26        | 29        | 41        | 32        | 27        | 29        | 300        |
| No. of new service user children recorded during the month                | 15        | 19        | 14        | 20        | 16        | 15        | 22        | 22        | 13        | 14        | 9         | 20        | 199        |
| No. of service user children closed during the month                      | 9         | 19        | 10        | 22        | 14        | 10        | 19        | 10        | 22        | 19        | 7         | 6         | 167        |
| <b>TOTAL NO. OF CHILDREN ASSOCIATED WITH SERVICE USERS EACH MONTH</b>     | <b>28</b> | <b>38</b> | <b>33</b> | <b>43</b> | <b>37</b> | <b>36</b> | <b>48</b> | <b>51</b> | <b>54</b> | <b>46</b> | <b>36</b> | <b>49</b> | <b>499</b> |
| <b>TOTAL NO. OF UNIQUE SERVICE USER CHILDREN RECORDED DURING THE YEAR</b> | <b>28</b> | <b>19</b> | <b>14</b> | <b>20</b> | <b>16</b> | <b>15</b> | <b>22</b> | <b>22</b> | <b>13</b> | <b>14</b> | <b>9</b>  | <b>20</b> | <b>212</b> |
| 19. CIDVA SERVICE USER CHILDREN AGE                                       |           |           |           |           |           |           |           |           |           |           |           |           |            |
|   | Apr       | May       | June      | July      | Aug       | Sept      | Oct       | Nov       | Dec       | Jan       | Feb       | Mar       | Total      |
| <1  | 3         | 1         | 0         | 2         | 0         | 1         | 0         | 2         | 2         | 1         | 0         | 0         | 12         |
| 1-4   | 6         | 8         | 5         | 7         | 7         | 6         | 4         | 8         | 4         | 6         | 5         | 8         | 74         |
| 5-9   | 9         | 3         | 7         | 10        | 3         | 2         | 13        | 7         | 2         | 5         | 2         | 7         | 70         |
| 10-14   | 7         | 3         | 1         | 1         | 4         | 3         | 3         | 1         | 4         | 1         | 2         | 4         | 34         |
| 15-18   | 3         | 4         | 1         | 0         | 2         | 3         | 2         | 3         | 1         | 1         | 0         | 1         | 21         |
| Unknown   | 0         | 0         | 0         | 0         | 0         | 0         | 0         | 1         | 0         | 0         | 0         | 0         | 1          |
| <b>Total</b>  | <b>28</b> | <b>19</b> | <b>14</b> | <b>20</b> | <b>16</b> | <b>15</b> | <b>22</b> | <b>22</b> | <b>13</b> | <b>14</b> | <b>9</b>  | <b>20</b> | <b>212</b> |

# Appendix 5

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## Single agency assurance reporting

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This section includes reports direct from each of the statutory agencies involved with the HSCB.

### a. West Mercia Police.

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In January 2016, the alliance launched 'Pathfinder' in Worcestershire as a new investigative model. This brought together CID, PVP and IOM (Integrated Offender Management) into a single investigative team with the most appropriate resources deployed to respond and investigate incidents and crimes. This is based on the threat, harm and risk inherent in that incident, rather than based primarily on category heading.

In line with our vision to protect the most vulnerable from harm, the revised investigative model has sought to enhance the quality of service to victims, witnesses and suspects.

The single team contains officers and staff with necessary specialism's (such as child abuse investigators, ABE interviewers, suspect interviewers etc) to respond effectively to incidents at the earliest opportunity. Detective officers are (when appropriate to do so) adopting the role of first responders to incidents, promoting a 'right first time' approach.

The investigative model now allows for detective resilience for addressing child protection investigations from 0800hrs to 2300hrs seven days a week. The investigators have access to first and second line management to ensure appropriate support, resilience and management scrutiny or the most complex of cases and appropriate engagement for interagency planning.

Additional resources have been invested in Learning & Development to increase the number of specialist and appropriately qualified child abuse investigators within the model. This is further supported by the delivery of a programme of vulnerability training for all front line officers and staff. This will ensure those responding have the ability to recognise risk to our most vulnerable children and adults, and deal appropriately.

The new investigative model was extended to Warwickshire in June and Herefordshire in July 2016. It is acknowledged that a period of stability is required to embed the investigative model. The implementation across Telford and Shropshire is paused in order to take into account a review and learning from the existing areas. A key element of the revised investigative model is the transfer of ownership of resources from central to 'local' ownership.

An additional investment of 54 posts within investigation and Harm Assessment Unit teams are to be made permanent. A proportion of these resources are to be allocated to dedicated CSE and on-line CSE teams. This is in recognition of the changing nature of demand and the need to safeguard children and young people against new and emerging threats.

The 'recognising and responding to vulnerability' change programme has been delivered to Warwickshire staff in late 2016 and rollout for West Mercia is planned later in 2017 following the independent evaluation by Worcester University. Supervisors will receive additional inputs early 2018.

The continued development of the Strategic Vulnerability team will allow for environmental scanning and dissemination of learning from SCRs and DHRs, driving activity in response to HMIC. The Major Crime Statutory Review Unit (MCSRU) has been aligned under the Superintendent Strategic Vulnerability role to further enhance the learning organisation culture.

Embedding these structural changes has impacted upon multi-agency working. There is an increased pool of experienced individuals within West Mercia Police available to engage at the appropriate level with partner agencies. HAU staff engage in MASH, developing DA and CSE / missing triage.

In relation to child safeguarding the main point of connectivity between the new investigative model and our partners are within the various MASH functions and within the child protection processes as set out in working together. In respect of MASH, consultation is being addressed via the various strategic governance groups within the LA areas, and in respect of child protection processes the Police are committed to continuing to fulfil their statutory responsibility to ensure attendance and appropriate contribution by a representative with the appropriate experience and knowledge of the case.

HMIC have published their PEEL report for both West Mercia Police and Warwickshire Police on 01.03.16. The learning identified will be used to further develop and enhance the policing response to vulnerability.

## **b. The National Probation Service (NPS)**

Hereford NPS continues to be committed to child safeguarding.

Child safeguarding checks are carried out via MASH at the beginning of each order.

Wherever children are involved in the life of an offender any necessary identified action regarding child safeguarding is included in the offender's risk management plan. Actions may include Home Visits or regular liaison with other agencies such as children's services or police.

MAPPA action points regarding additional child safeguarding are often identified during the course of a MAPPA 2/3 panel and the Probation OM will complete these where tasked to do so. Action points may include MARF completion or the need for some form of disclosure to protect children.

NPS staff are aware of identified CSE processes and refer in any identified cases via MASH. Identified CSE issues are also fully addressed in the NPS risk assessment and risk management processes. NPS offender managers address child safeguarding issues directly with offenders in supervision sessions. Such topics may include the impact of DV on children or the child's perspective where that child has been sexually abused. Child safeguarding/ protection is also reinforced by programme facilitators where the offender is participating in DV or sex offender group work programmes.

## **c. Warwickshire and West Mercia Community Rehabilitation Company (WWM CRC).**

On 1st June 2015 under the Transforming Rehabilitation (TR) Programme, the 35 Probation Trusts were reorganised in to a National Probation Service (NPS) and 21 Community Rehabilitation Companies (CRCs). The TR reforms created a two-stream probation system, which comprises the public sector NPS, responsible for high-risk offenders, and 21 private CRCs, responsible for low- and medium risk offenders.

The split has resulted in organisational bifurcation and significant change in the status of workers across the new delivery structures. This has created challenges to safeguarding as it has added a further level of complexity onto the probation system, with additional handover points between the NPS and CRCs.

Unlike our counterparts in the NPS, staff working in the CRC as private sector employees no longer retain the historical status as officers of the court. The NPS is responsible for making initial decisions about the risk posed by offenders, allocation of cases to NPS or CRC and for providing information and advice to the courts with respect to all offenders including the preparation of reports and initial checks with children agencies.

The CRC is not involved in preparing reports for court and many of the new cases are assigned to offender managers who have no previous knowledge of the offender. CRCs are contracted to deliver probation services for the majority of those given community orders or suspended sentence orders by the courts and those who require supervision upon release from custody.

Good communication between the NPS and the CRC is crucial in ensuring the smooth allocation of cases, full transfer of information and to make sure that proper breach and escalation procedures are followed.

## WWMCRC Changes

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The WWMCRC has undergone significant changes since the introduction of TR in June 2014. WWMCRC has developed the Support, Transforming, Education and Progress (STEP) Centres in Worcester and Telford. A 'One Roof' partnership model to offer wider services from a single location. A 'contact Centre' developed in Shrewsbury to see offenders who are unable to travel in to Telford due to employment or transport difficulties. All staff from Shrewsbury and Telford office, which we previously shared with the NPS, transferred to the STEP centre in Telford. The Hereford, Nuneaton and Leamington offices remain shared offices with staff from NPS.

The projected workloads calculated prior to TR had not come to fruition and this had an adverse impact upon WWMCRC income. This created great uncertainty within the business. Workloads were lower than anticipated and consequently a restructure of the business took place during June – September 2016 that led to reductions in staffing

Information sharing between the NPS and CRC has improved with monthly interface meetings arranged to address any challenges. There is evidence of problem solving and solution focus with the NPS over appropriate proposals for reports, case supervision and safeguarding of children.

All staff are appropriately trained in domestic violence and the safeguarding of children.

Phase 1 of the new information technology system was delivered and a new case management system – ENIGMA will be introduced in 2017/18.

Like all other CRCs WWMCRC are subject to monitoring against the contractual targets set by the National Offender Management Service (NOMS). At the end of March 2017 WWMCRC was performing well against the contractual requirements and those measures applied by NOMS to provide assurance.

As part of TR changes to reduce the stubborn high re-offending rates the Offender Rehabilitation Act 2014 introduced statutory post-release supervision for short sentence prisoners (less than 12 months' custody) at resettlement prisons. Through the Gate resettlement, services were introduced in May 2015 as part of the contract for CRCs. WWMCRC has a strong commitment to addressing high reoffending rates and deployed considerable resources in to the Through the Gate team lead by a senior manager at Featherstone and Hewell resettlement prisons.

## Quality Assurance

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WWM CRC has implemented a quality development plan to assure the NOMS contract management team that the CRC is regularly undertaking quality assurance on a monthly basis.

The quality development plan captures team, Local Delivery Unit (LDU) and area wide quality development actions and objectives. The quality development plan incorporates a response to findings of internal audits, NOMS operational assurance reviews, inspection reports and serious further offence reviews.

The majority of quality development objectives are derived from our internal audit programme and NOMS operational assurance reviews. Audit findings are circulated monthly with ratings for each team and LDU, which are then reviewed at LDU manager meetings. Practice and quality issues are addressed with individuals by senior probation officers in supervision. Team issues/themes are recorded and monitored against progress on the quality development template.

We have undertaken audits on enforcement and on cases that should have been seen at 5 days, 6 weeks and 3 monthly periods. Failure to see offenders or take effective enforcement action meant that responsible officers are not able to identify properly the risk of harm posed to others at the start or during the sentence or licence. This meant that offender managers could not prioritise protection of the public or potential victims.

We have undertaken an audit of our recording practice with regards to recorded professional judgements entries and offender assessment (OASys) reviews in response to significant events and/change of circumstances. (The offender manager decides whether the seriousness of the change requires an OASys or professional judgement needs to be completed. More information can be input into OASys than a professional judgement). Most cases had safeguarding issues recorded however; the audit highlighted some common themes:

1. Offender managers need to be evidencing that following a significant event or change in circumstance the case is reviewed.
2. The lack of consideration given to risk of harm and re-offending. From the audits the following examples have been raised with staff:
  - If the initial sentence plan assesses that, the offender's accommodation is linked to both harm and re-offending and information is received that they have moved. The case needs to be reviewed and risked assessed by completing the OASys document or providing a recorded professional judgement. Domestic violence and checks with children services are required to be completed.
  - When domestic abuse perpetrator starts a new relationship, the offender manager needs to be reviewing the case using either completing a full offender assessment document or a professional judgement to evidence what actions is being taken to manage the case.
  - If a domestic abuse or children's services check is returned that has different information than that in a previously completed OASys, offender managers need to be completing a review (either OASys or professional judgement) to evidence that it has been risk assessed and are managing the risk based on the new information
  - Many of the critiques from audits is that offender managers record information but do not assess or analyse the information.

We have commenced an audit of our sentence plans. The audit is a peer audit with the aim to support the offender manager's awareness and understanding of sentence planning quality standards.

A sample of cases previously audited found the assessment of the risk of harm posed to others, and subsequent planning was not carried out well enough in a number of cases inspected. Assessments were not always up to date and had missing or incorrect information. Significant information was not always recognised as such and there was a lack of awareness of domestic abuse and child safeguarding issues. This problem was exacerbated where screenings or assessments from court did not include all relevant information.

### Poor practice example:

In one case, the offender manager did not consider the risk of harm the offender posed to others. Instead, the offender manager took at face value that the offender embedded the learning from the Building Better Relationships programme (an accredited programme to address domestic violence) and Alcohol treatment from a counsellor and would not reoffend. There was no consideration to the fact that he had re-established contact with his partner. He had overnight contact with his daughter in his home who was potentially at risk from him. There was no contact with children's social services to assess or plan how to protect the daughter, despite her already being known to them as a child in need.

The risk management plan lacked any detail. It did not specify how children or the victims would be kept safe. There was a restraining order in place but no detail how this would be monitored or enforced. Overall, the quality of risk management in this case was poor.



## Good practice example:

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CR (the offender) committed an offence of breach of a non-molestation order against his ex-partner. He has a long history of substance misuse related offending covering a range of offences. CR was assessed as posing a medium risk of harm to others, mainly his ex-partner and her child (should the child witness any domestic abuse).

This risk had been appropriately managed with regular liaison with children services, substance misuse services and police domestic violence unit.

## Overall

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There has been improved communication and information sharing between the NPS and CRC. Prompt allocation of cases and good quality assurance processes has enabled offender managers to manage and have oversight of cases where children are at risk.

### d. West Mercia Youth Offending Service

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In 2016/17 the service was transferred to the Office of the Police and Crime Commissioner and underwent a restructure which was completed in November 2016. Also during the first 6 months of 2016/17 the service implemented a new case management system in order to support the concurrent implementation of a new assessment and planning framework. The new assessment framework includes and single integrated plan for the risk areas of re-offending, risk to others and safeguarding.

The work started in 2015/16 to improve the quality of assessments and plans continued into the first quarter of 2016/17, and monthly auditing demonstrated continuous improvement. The implementation of the new assessment and planning framework has necessitated developing a new quality assurance process for this area of work, and a baseline of current quality has been established. Further work is planned in order to fully embed the new assessment and planning framework in practice.

The service continued to undertake critical learning reviews during 2016/17 when young people under the supervision of the Youth Justice Service committed defined serious further offences or where they have died, attempted suicide or been a victim of serious offence, however in 2016/17 there were no Herefordshire cases requiring review. The findings of the reviews are reported to the LSCB through the annual assurance report.

### e. Herefordshire Clinical Commissioning Group

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Clinical Commissioning Groups (CCGs) were created following the Health and Social Care Act in 2012, and replaced Primary Care Trusts on 1 April 2013, they are membership organisations that bring together general practices to commission services for their registered populations and for unregistered patients who live in their area. CCGs are responsible for commissioning most hospital and community healthcare services as well as primary care services. In July 2015 NHS England published a document Safeguarding Vulnerable People in the NHS – Accountability and Assurance Framework which sets out the responsibilities of each part of the NHS system. Herefordshire CCG conforms to all the requirements set out in this document.

All staff receive yearly safeguarding training and those who have patient contact receive regular safeguarding supervision.

As a commissioning organisation the CCG ensures that all its commissioned services have robust safeguarding processes and policies in place. We frequently assure ourselves that these processes are robustly adhered to by holding regular Contract Quality Review Forums with all our major contractors and also conducting quality assurance visits to provider's clinical areas.

The CCG has good working relationships with partner agencies and supports Herefordshire Safeguarding Boards both financially and by a commitment to the functioning of the Boards, including the chairing of several subgroups.

The CCG regularly reviews its safeguarding duties by reporting performance and safeguarding developments to the CCG's Quality and Patient Safety Committee (a subgroup of the Governing Body) and the Governing Body.



The CCG Governing Body receive an annual NHS system wide safeguarding report which analyses safeguarding across all NHS services, and provides assurance that the NHS is delivering services which protect the residents of Herefordshire.

## f. 2Gether NHS Foundation TRUST

### Safeguarding Children Activity

In Herefordshire 2g is commissioned to provide a range of mental health services including Child and Adolescent Mental Health Services (CAMHS -Tier 1-3), Adult Mental Health services, Older Adult and Community Learning Disability services.

All services have responsibilities for safeguarding children within a 'Think family' framework.

Staff in Herefordshire are actively encouraged to contact the 2g Trust Safeguarding team for consultation around all safeguarding issues. The team have been contacted on 28 occasions during the year 2016 -2017. Staff also contact the Local Authority directly for advice and are encouraged to do – this is emphasised in local training. If abuse or neglect is being experienced (or suspected) staff will directly contact the Local Authority via the Multi-Agency Safeguarding Hub (MASH).

The CAMHS team, including staff who work with children with disabilities, receive group Reflective Safeguarding Supervision on a monthly basis. All staff working with children attend a minimum of 3 sessions a year. This has been provided by the Named Doctor and Named Nurse for safeguarding. Safeguarding Supervision is also included as an agenda item for all team meetings and for individual operational/professional supervision (in line with 2g Supervision Policy).

Staff follow the West Midlands Safeguarding Policies and Procedures and access the relevant documents from the HSCB website. Any updates to policies and procedures are published on the 2g website to inform all staff, by the 2g Communications team. The 2g Safeguarding Children Policy includes links to the website.

Herefordshire Local Authority hold and monitor the Safeguarding data for the County. One challenge is that the local authority is unable to provide 2g with data e.g. how many referrals come from 2g, as all health agencies are classed as one under the banner of 'Health'. It is also unable to reflect on the number of contacts for advice, for the same reason.

Any issues around practice are identified when participating in Multi-Agency Audits under the Quality Assurance subgroup of the Safeguarding Board and 2g single agency audits. These actions will be monitored through our internal monthly safeguarding subcommittee which reports to our governance committee. Herefordshire Clinical Commissioning Group (HCCG) is invited to attend this subcommittee for additional assurance.

2g is fully engaged in partnership working. The DDoN attended the Strategic Meetings including being an active member of both Safeguarding Boards.

The 2g safeguarding team participate in all subgroups of the Adult and Children Safeguarding Boards, where requested. These include:

HSAB Executive as a subgroup chair, Joint Case Review, Performance, Audit and Quality, Training and Workforce development, MCA & DoLS, Policy and Procedure for adults and Child Sexual Exploitation.

The 2g Safeguarding Lead has recently taken over chairing the Policy and Procedure subgroup for Adults and deputises for the Quality Assurance for Children and Adults.

Frontline staff have participated in multi-agency audits for Quality Assurance when requested to. 2g also actively participates in 'practice runs' e.g. for the Joint Targeted Area Inspection (JTAI) to establish any gaps in practice.

Frontline staff and Team Managers have participated in Serious Case Reviews, Safeguarding Adult Reviews and other learning processes (including Domestic Homicide Reviews). The 2g Safeguarding Lead has chaired Practice Learning Review meetings and written independent reports for Learning Reviews for adults.

The 2g Trust Training Lead attends the Training and Workforce development subgroup. The Safeguarding Team have offered to be part of the training pool and have presented at Practitioner Forums.

Operational Managers in 2g attend MAPPA, Prevent, and MARAC steering groups.

Updates from all Safeguarding meetings are relayed to Safeguarding champions who attend the 2g Trust monthly Safeguarding subcommittee meeting. This is held at Trust Headquarters in Gloucester and quarterly in Herefordshire. A representative from Herefordshire Adult Mental Health and CAMHS attend monthly. Highlights from this meeting, along with a monthly topical Newsletter are sent out to all attendees, who disseminate to all team managers in the area.

Information is also taken to safeguarding supervision sessions, and adult teams for updates, including that relating to training requirements and available opportunities. This includes all alerts and information disseminated via the Local Safeguarding Boards.

## Training

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Over the last year, the training requirements for staff have been reviewed. This is largely owing to the requirements set out in 'Safeguarding children and young people: roles and competences for health care staff Intercollegiate Document.'<sup>3</sup>

Level one safeguarding Adults and Children training is provided in a 1 hour session to all staff at Corporate Induction. All staff receive this – there is a 100% compliance rate.

Level Two Safeguarding Adults and Children (Universal) training is delivered by Hoople and attended by the 2g Safeguarding Practitioner when possible. This is delivered as a 'Think Family' training day and as of March 31st 2017; compliance was at a rate of 79%.

3 Royal College of Paediatrics and Child Health (2014) Safeguarding children and young people: roles and competences for health care staff Intercollegiate Document. RCPCH.

Level 3 Safeguarding Children (Targeted Working together to safeguard children) is delivered by Hoople as a Multi-agency training day. As of 31st March 2017, the compliance rate was captured as 73% across teams in Herefordshire.

The monthly internal safeguarding subcommittee monitors all areas of training compliance and has put in place plans to increase training and in addition plans to train all adult mental health workers to level 3 children safeguarding. This is a major task and involved large numbers of staff within the trust. This will also be monitored via the HCCG Clinical Quality and Performance Forum (CQRF).

## Policies

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The Safeguarding Adult and Safeguarding Children policies in 2g reflect requirements for safeguarding from National and Local Legislation and guidance. Direction is given with links to the West Midlands Policy & procedures.

The policies include guidance for working with Domestic Abuse and Sexual Violence (including MARAC), Female Genital Mutilation (FGM), Prevent and MAPPA, rather than stand-alone policies and procedures for these specific issues.

Safeguarding is central to all work within the Trust and so is included in all areas of the policy framework e.g. Assessment and Care Management, Recruitment of staff, Serious Incident investigations, Supervision Policy, Children Visiting Psychiatric Hospitals, Under 18s admission into Adult wards.

Both the Adult and Children Safeguarding Policies have been reviewed (May 2017) to reflect the changes in training requirements for Safeguarding Children and Prevent.

## Together NHS Foundation Trust Safeguarding Objectives and actions 2015/16

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- 1 Shared learning from local Serious Case Reviews and other learning processes (Serious Incident Learning Processes (SILP), Herefordshire Evaluation Learning Process (HELP), SCIE, Root Cause Analysis (RCA) and Domestic Homicide Reviews (DHRs) to improve safeguarding for adults and children practice. Monitored at the 2g safeguarding subcommittee and is on-going.
- 2 Increased provision of formal group safeguarding supervision and safeguarding awareness/educative sessions to teams working with Children and Adults. Safeguarding Supervision for CAMHS is held monthly.
- 3 Promotion of a 'Think Family' approach to adult teams, alongside 'safeguarding adults' in view of the Care Act 2014 provisions and 'Making Safeguarding Personal'. Safeguarding Practitioner sits within mental health teams to promote all aspects of safeguarding practice.
- 4 Ensuring all staff receive the appropriate level of training according to their role, noting developments associated with The Care Act 2014 and the Intercollegiate guidance 2014 for safeguarding children. Training needs have been reviewed and compliance rates have increased.
- 5 Improving partnership working with stakeholder agencies, prioritising on issues relating to: Domestic Abuse, Parental Mental Health, Substance Misuse, Child Sexual Exploitation, Female Genital Mutilation and PREVENT. This is evidenced in attendance at subgroups, participation in audits, inclusion in the Think Family training day (level 2) and discussions with staff/informal supervision.
- 6 Providing assurance to the Trust Board that safeguarding is a priority function of the Trust and is being delivered to expected standard – quarterly reporting to and challenge at the 2g Quality Clinical risk Governance committee.

## g. Wye Valley NHS Trust (WVT)

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Wye Valley NHS Trust is the provider of healthcare services at Hereford County Hospital, which is based in the city of Hereford, along with a number of community services for Herefordshire and its borders. We also provide healthcare services at community hospitals in the market towns of Ross-on-Wye, Leominster and Bromyard. We work hard to deliver across traditional boundaries to provide integrated care in order to deliver a standard of care we would want for ourselves, our families and friends.

Safeguarding is central to quality of care and patient safety. The effectiveness of the safeguarding system is assured and regulated by a number of bodies and mechanisms. Wye Valley NHS Trust has an established safeguarding children quality framework which includes a safeguarding children performance dashboard and an annual audit plan. This assurance framework is monitored by the Trust's Safeguarding Committee, chaired by the Director of Nursing, the Executive Lead for Safeguarding children

The Trust works collaboratively to support the business of the HSCB in a number of ways, aligning safeguarding children priorities to those of the HSCB business plans and contributing to the work of the board and subgroups; for example during 2016-17 WVT supported the work of the board in the development of policy, chairing of the Policy and Practice subgroup and the development and delivery of multi- agency training on behalf of the board.

In the previous HSCB annual report we highlighted that WVT had been in special measures since June 2014 following a Care Quality Commission (CQC) inspection rating of inadequate. Since this time a quality improvement programme has been in place and significant improvements have been made. A re-inspection of hospital services took in July 2016, (community services were not part of the inspection as the previous inspection had not identified any significant concerns). Following this inspection the Trust was taken out of special measures. The summary of findings report can be accessed at [http://www.cqc.org.uk/sites/default/files/new\\_reports/AAAF7512.pdf](http://www.cqc.org.uk/sites/default/files/new_reports/AAAF7512.pdf)

The inspectors found that there was a significant improvement in children and young people's services. The rating for "Are Services Safe?" had improved from inadequate to good. The inspectors found that staff across the trust had an understanding of their roles and responsibilities and the types of concerns that may indicate that a child safeguarding referral was required. They understood the referral process and knew how to make referrals. The work of the Young Ambassador group was acknowledged as excellent, noting their input into service re-design and the current project of involvement in the making a film on transitional care for national distribution. The inspectors found that staff listened to and respected their opinions and that they saw the services provided "through the eyes of the children and young people".

The Trust continues to work towards further improving services with actions to improve compliance with mandatory children's safeguarding children training; contribution to the Herefordshire CCG group which is tasked to improve CAMHS services to children and young people requiring acute admission to Hereford hospital and to secure a new safeguarding children advisor post based in the hospital.

## h. Education and Schools

Schools remain critically important partners in our collective responsibilities towards safeguarding children. The increased diversity of school organisation - Local Authority maintained, academy, free school, coupled with increasing financial autonomy, presents a challenge to centralised safeguarding approaches. This has been exemplified, from April 2017, by the change in funding arrangements for the MASH education posts and the safeguarding services provided to schools by the learning and achievement service.

Since the inception of the MASH, the education officer funding had been top-sliced from schools with consent from Schools Forum. This established funding arrangement has changed at the insistence of the Department for Education. Consequently, Herefordshire introduced a service level agreement with schools to fund these services from April 2017. This has been a difficult process, with a sizeable minority of schools questioning the new arrangements (despite failing to raise objections during consultation) and requiring personal intervention to convince them of the revised arrangements. A small number of schools still

refuse to pay, July 2017. Despite these difficulties, Herefordshire schools continue to fund 1.5 education officers in the Multi-Agency Safeguarding Hub. The education officers form an integral part of the MASH in the gathering and dissemination of information to and from education partners. In addition, the MASH education officers offer advice, support and training to schools to assist with the development of best practice and statutory compliance. They represent schools on the CSE operational group and workforce development group. In addition, they represent Herefordshire at meetings of the Midlands Association of Safeguarding in Education to further enhance best practice across the region.

The academic year 2016/17 has seen further changes in schools as we continue to shape our work in response to new and challenging circumstances. This has included: the ongoing participation of professionals in Workshops to Raise Awareness of Prevent; the implementation of the CSE pre-checklist and toolkit; the completion of the audit process of policy and practice with regard to Keeping Children Safe in Education (KCSiE). Responses to the audit have been encouraging, with all but three educational establishments completing the audit. The audit tool has been redrafted to reflect KCSiE 2016 and, subject to additional input from Herefordshire School Improvement Partnership, will be ready for issue to schools during autumn term 2017. Importantly, the revised audit will be issued to all private education settings as the Local Authority must be satisfied with the safeguarding arrangements of these institutions too.



## The HSCB has been monitors the following key indicators in education:

### Children Missing from Education (CME)

The tracking down of children referred as 'missing from education' has been increasingly successful over the past 4 years, with fewer children remaining as 'missing' from one quarter to the next. There has been a steady improvement in the tracking and location of CME year on year.

CME data during the period 01/09/2015 to 31/08/2016

68 New Referrals received

Autumn 2015: 37

Spring 2016: 14

Summer 2016: 17

Total New cases: 68

B/fwd. from 2014/15: 5

Closed 2015/16: 71

Carried/fwd. to 2016/17: 2

This performance is reflective of the dedication and tenacity of the CME officer, coupled with the heightened awareness of partner agencies of the critical importance of this work towards keeping children safe.

### Elective Home Education (EHE)

2016-17 saw a further increase, from 118 to 170, in the numbers of children known to the local authority who are educated at home. There were 85 children educated at home 2011-12. It is likely that the proportion of parents registering children as Electively Home Educated with the local authority is increasing, in addition to a growth in this parental choice. The EHE officer continues to offer guidance and to make robust monitoring visits about outcomes for children. The number of parents who choose to meet with our EHE service in order to receive advice and to discuss the suitability of their arrangements is a measure of the confidence that home educators have in our EHE officer. The feedback from parents who receive advice and guidance from the EHE officer remains overwhelmingly positive. It will be important to consider the current arrangements as the post holder is currently employed on 0.5 contract, but has seen a doubling of caseload over a five year period.

## Reporting by schools of bullying and racist incidents

| Year    | Bullying | Racist Incidents |
|---------|----------|------------------|
| 2014/15 | 79       | 39               |
| 2015/16 | 48       | 48               |
| 2016/17 | 25       | 11               |

Reported incidents of bullying and racist incidents have reduced significantly, compared to the previous year. Whilst there has been an improvement in recent years of the number of schools complying with the request to submit a return, this has decreased 2015/16. In addition, further work is required on the number of schools providing nil returns, i.e. no reported incidents. There appear to be too many nil returns relative to the expected incidence of bullying. However, it is encouraging that there appears to be a significant reduction in racist incidents in schools, despite a national spike in hate-crime, post-Brexit.

### i. Herefordshire Council: Children's Wellbeing Services

During this year, the Children's Wellbeing Directorate built on the improvements of the previous year by reviewing key elements of its safeguarding practice to ensure that was as effective as possible. An extensive review of our MASH led to HSCB agreeing revisions to the its purpose, emphasising its role in managing requests for a social work service and ensuring that children at risk received a prompt response. A MASH Governance Board was established and this has overseen the revision of guidance and the move from Bath St to Nelson House, planned for the spring of 2017.

Following an audit of child protection casework and conferences, the guidance to professionals attending child protection meetings was revised to ensure a focus on the evidence of harm and HSCB granted the Conference Chairs the power to veto decisions that are not supported by evidence. This approach also informed a review of child protection strategy meetings. The consequence of this work, considered in the round, has been a sustained reduction in the number of children subject to child protection plans in the county. This reduction has meant that professionals have more time to respond in depth to those children who are subject to a plan while other families are supported through the children in need process.

The Fieldwork Service reviewed its team structure during the year and introduced a specialist model which will support best practice and allow social workers to develop expertise. Child Protection and Court teams will take responsibility for the children at greatest risk while the Assessment Teams will dedicate time to support children in need and their families after assessment. The service has been renamed the Children in Need Service.

We welcomed a permanent Head of Looked After Children and Adoption who has initiated a major review of the county's corporate parenting strategy as well as negotiating our membership of a Regional Adoption Agency which will conclude during 2017.

HSCB adopted an Early Help Strategy in the spring of 2016 and its implementation is being led by the Head of Educational Development who chairs a multidisciplinary group. The Head of Additional Needs now manages an integrated 0-25 SEND Service which will give children and their families a more consistent and coherent service. The Head of Learning and Achievement has overseen the review of over half of Herefordshire's schools' safeguarding policies to ensure that they are fit for purpose and understood by staff.

Directorate staff convene regular commissioning network meetings with local service providers. These meetings have been utilised to develop a broader understanding of safeguarding across the county through specific presentations and discussion.

The Local Authority Designated Officer continues to advise employers on the management of concerns about staff behaviour towards children and also offers training and support to organisations in the county.

Our Quality Assurance Framework has been to incorporate advice from Ofsted about the scope and focus case file audits. The revised model has been introduced and is being evaluated. There is a clearer focus on the experience of the child and the improvement of their situation.

There has been a significant increase in the percentage of permanent Social Workers in the establishment. We have reduced our use of agency staff from 60 at the beginning of 2016 to 16 at the end. Currently we have 80% of our posts occupied by permanent staff, 11% by agency staff and 9% vacant. We continue to recruit to our establishment to reduce the number of vacancies further.

The introduction of a revised senior social work role and a change to our management structure improve our career pathways for staff and should improve staff retention in the coming years.

## **j. Hereford & Worcester Fire and Rescue Service**

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### **Hereford IGNITE Scheme**

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Members of the Hereford & Worcester Fire and Rescue Service Community Risk team including Service Volunteers have undertaken a project at Brookfield School, Hereford entitled IGNITE.

The week long scheme delivered to Year 10 pupils focused on a number of elements including team work, leadership and effective communication. Throughout the week the young people were given a number of challenging tasks to complete which involved them working together in order for them to achieve the set tasks whilst demonstrating the new skills they had developed. As well as receiving input into a number of operational elements they also took part in a number of workshops involving fire and water safety, arson awareness, first aid and road safety during which they were able to observe an RTC reconstruction. The students, all of whom are currently passengers in vehicles and many of whom will be looking to drive in the future took a great deal from the experience.

The week concluded with the students tackling a simulated car fire bringing together all the skills and knowledge they gained and all the students were presented with a certificate by the Service formally recording and recognising their achievements.

The school were also very pleased with how the pupils developed and worked together, with the Deputy Head teacher adding "I just wanted to catch up with you to say a big thank you for the course that you and your team presented for our students. I just wanted to re-emphasise how successful we as a school felt that the course was. All the students gained a tremendous amount from the activities and being together, learning those skills of teamwork, communication, leadership and responsibility in a fun and exciting way".

Based upon the success of the project it is envisaged that further schemes may be rolled out in the future.





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## HSCB BUSINESS PLAN 2017-19

This document sets out the strategic objectives for Herefordshire Safeguarding Children Board (HSCB) for 2017-19. It refreshes the strategic business plan (2016/18). These strategic priorities will inform the development of the business / action plans of the HSCB sub groups. The HSCB's multi-agency performance dataset, audit programme and other associated learning and improvement activity will enable the HSCB to evaluate the impact of this plan on improving practice and outcomes for children and young people in Herefordshire. The impact of the plan will be reported in the HSCB Annual Report 2017-18 and any further areas of improvement will also be identified.

| Strategic Priorities | NEGLECT:<br>Identification and response to childhood neglect.  | CHILD SEXUAL EXPLOITATION:<br>Identification, prevention and response to Child Sexual Exploitation/ children who go missing.  | EFFECTIVE SAFEGUARDING: Ensure effective planning and intervention to improve the care, safety and wellbeing of children and reduce/eradicate actual or the risk of significant harm   | EARLY HELP:<br>The early help services effectively identify needs and concerns relating to children and families, and services address these needs through effective planning and interventions to enable families to function effectively and children's needs are met and they are supported to achieve their full potential.   | Strong Leadership - Strong Partnership:<br>The HSCB seeks assurance, challenges and support partner agencies in safeguarding children. The board ensures that lessons are learnt and improvements are made and embedded.   |
|----------------------|--|---|--|---|--|
| Key Outcomes         | <p>Concerns about possible childhood neglect are identified early and interventions put in place to ensure children's needs are met and they are not at risk of, or experiencing, neglect.</p> <p>Where chronic cases of neglect are identified plans are put in place to protect children from further neglect.</p> <p>Consistent and timely response across agencies</p> | <p>The pathway for addressing concerns about cases of suspected CSE are clear.</p> <p>There is clear data relating to CSE: children experiencing and at risk of CSE, related factors including perpetrators, and children missing from home.</p> <p>There is good intelligence from practice to better understand the prevalence of CSE and inform responses.</p> <p>Children, families, the general public and professionals know about and understand CSE and</p> | <p>The process and decision making at the initial stages of the child protection process (strategy meetings/ section 47 investigations) comply with statutory guidance, and the decisions are consistent with the levels of need in Herefordshire.</p> <p>The child protection planning and review process (child protection conferences/ core groups) are truly multi-agency and consistent with guidance and procedures.</p> | <p>Effective decision making is taking place at the early stage of identification of needs, and appropriately directed to WISH, Early Triage (MAG) or referred to MASH (is this still the correct terminology?) so that children and their families receive effective help at the right time.</p> <p>Common Assessments are taking place within timescales and are effective in identifying needs of children and families and planning interventions (there is clear multi agency engagement in this process).</p> | <p>Full engagement by all partners in all the process of the HSCB:<br/>Attendance and representation, as agreed in terms of reference and constitution, at Board meetings; executive, sub groups and task and finish groups.</p> <p>Open and informed reporting to the HSCB from partner agencies on safeguarding responsibilities, strengths and areas for improvement. Involvement</p> |

| Strategic Priorities | NEGLECT:<br>Identification and response to childhood neglect.   | CHILD SEXUAL EXPLOITATION:<br>Identification, prevention and response to Child Sexual Exploitation/ children who go missing.   | EFFECTIVE SAFEGUARDING: Ensure effective planning and intervention to improve the care, safety and wellbeing of children and reduce/eradicate actual or the risk of significant harm                                    | EARLY HELP:<br>The early help services effectively identify needs and concerns relating to children and families, and services address these needs through effective planning and interventions to enable families to function effectively and children’s needs are met and they are supported to achieve their full potential. | Strong Leadership - Strong Partnership:<br>The HSCB seeks assurance, challenges and support partner agencies in safeguarding children. The board ensures that lessons are learnt and improvements are made and embedded.  |
|----------------------|---|--|---|---|---|
|                      | <p>Innovative tools and approaches are put in place to support practitioners in assessing and understanding neglect and improving and better targeting work and interventions with families. With a clear focus of the impact of neglect on children and young people</p> | <p>how to respond as appropriate.</p> <p>Return home interviews are of good quality and used at an individual and strategic level to tackle risks.</p> <p>Children who have experienced CSE receive appropriate post abuse support.</p> <p>Vulnerable children are effectively identified, safeguarded and supported</p> | <p>Child protection plans are effective in reducing/ eradicating the risk of significant harm to children.</p> <p>Children at risk of suffering significant harm are identified, safeguarded and wellbeing promoted</p> | <p>Lead professionals are identified in each case deemed level 2 or 3 on the continuum of need.</p>   | <p>in audits and case reviews and provision of performance information as appropriate.</p> <p>HSCB leads the safeguarding agenda, challenges partners and commits to an approach that learns lessons and embeds good practice. The plans and work of the board is aimed to maintain the effectiveness of multi-agency work top safeguard and promote the welfare of children now and in the future.</p> |

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## What will we do to deliver the five strategic priorities

| Strategic Priorities   | NEGLECT:<br>Identification and response to childhood neglect.  | CHILD SEXUAL EXPLOTATION:<br>Identification, prevention and response to Child Sexual Exploitation/ children who go missing.             | EFFECTIVE SAFEGUARDING:<br>Ensure effective planning and intervention to improve the care, safety and wellbeing of children and reduce/eradicate actual or the risk of significant harm.      | EARLY HELP:<br>The early help services effectively identify needs and concerns relating to children and families, and services address these needs through effective planning and interventions to enable families to function effectively and children's needs are met and they are supported to achieve their full potential.  | Strong Leadership-Strong Partnership;<br>The HSCB seeks assurance, challenges and support partner agencies in safeguarding children. The board ensures that lessons are learnt and improvements are made and embedded.  |
|--|--|---|---|--|---|
| <b>Policy and Procedures (RAG)</b>   | <p>Develop and implement a Childhood Neglect strategy</p> <p>Particular focus on embedding an effective childhood neglect assessment tool: Graded Care Profile 2 (GCP2), and</p> <p>GCP2 links with the Threshold / Levels of Need Guidance.</p> | <p>Review 'Children who abuse others' procedure and ensure appropriate guidance is available to practitioners within Herefordshire.</p> | <p>Maintain up to date LSCB procedures that align with regional arrangements, legislation and statutory guidance to inform the journey of the child through the child protection process.</p> | <p>Update of MARF and Threshold of need guidance</p> <p>Particular regard should be given to how LSCB procedures address certain vulnerabilities in relation to children and young people's safety and well-being, for example children living with substance misuse, domestic abuse within the family, children with disabilities</p> <p>HSCB procedures support the early help strategy.</p> | <p>Review on line procedure diagnostics to see if this can identify agencies accessing the HSCB multi agency procedures.</p> <p>Partner agencies to assure the HSCB that there staff are aware of and can access the multi-agency procedures, and that they have effective single agency safeguarding procedures and guidance in place,</p> |
| <b>Communications<br/>NOTE: The HSCB link in with the "One Herefordshire Communication and Engagement Group"</b> | <p>Deliver a launch event for the HSCB Childhood Neglect Strategy and associated changes to business practice.</p>   | <p>Support ongoing local and national CSE awareness campaigns.</p>  | <p>To inform about and promote multi-agency procedures and guidance, when they have been reviewed or updated.</p>   | <p>Raise awareness of early help support available and appropriate referral routes,</p>  | <p>Partner agencies can demonstrate that safeguarding messages are disseminated effectively through their organisations.</p> <p>On receipt of information and briefings from HSCB (e.g. updates of procedures messages from audits, events etc.) agencies ensure this is fully disseminated in</p>  |

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|---|--|---|--|--|--|
|   |  |   |  |  | their organization.  |
| <b>CSE and Missing</b>                    |  | Based on the latest CSE needs assessment and other reviews and audits revise the CSE/ missing strategy and develop a delivery plan for the strategy.<br><br>NOTE: The <b>CSE / missing</b> delivery plan details actions that the CSE / missing sub group should act upon as their business plan. | That there is assurance of the effectiveness of risk management planning in relation to individual children and young people at risk of CSE within risk management meetings. (linked to QA sub group)  |  |  |
| <b>Training and Workforce Development</b> | Deliver appropriate multi-agency neglect training, to include use of shared assessment tool (Graded Care Profile 2), and understanding of Levels of Need in relation to childhood neglect.<br><br>Evaluate the effectiveness of the training of an assessment tool and impact on practice. | Improve knowledge and understanding of CSE toolkit within agencies in Herefordshire through inclusion in the multi-agency CSE training,   | When reviewing multi-agency safeguarding training, ensure that this reflects the most up to date procedures and guidance.<br><br>Ensure that training includes reference to procedures and guidance that supports practice in understanding the additional vulnerabilities of some children and young people.<br><br>Ensure that multi-agency training reflects learning from case reviews and audits. | Early Help Practitioners to attend HSCB training   | Partner agencies can demonstrate effective single agency safeguarding training (This will be audited through section 11 audit), and that staff attend multi-agency safeguarding training as appropriate. |
| <b>Performance and Audit</b>              | Through case audit and performance information, report on the use of the GCP2 assessment tool and the extent of the understanding of neglect between partner agencies.   | Develop the quality of commentary accompanying the CSE scorecard.<br>Through audit:<br>Check the effectiveness of the response to previous CSE audit findings.<br><br>Understand the quality and  | Routinely use multi-agency performance data to understand local safeguarding practice and audit:<br>The application of LSCB thresholds, and;<br><br>The quality of child   | Through audit, assess the quality, effectiveness and availability of early help support and interventions.<br><br>Early help services are recognizing and responding to early safeguarding concerns, reducing the risk of children | Partner agencies:<br><br>Provide performance information when requested in relation to safeguarding children that also includes a narrative analysis.<br><br>Provide clear and detailed                  |

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|  | <p>Case audits to pick up on findings from SCR/PLR's in relation to childhood neglect</p>  | <p>availability of post abuse support to victims of CSE.</p> <p>Ensuring the quality and findings from intelligence relating to CSE and children who go missing (NOTE: some data will come from CSE Panel and RMM's).</p> <p>Identifying messages and lessons from case audits to improve practice</p> | <p>protection plans</p>   | <p>Suffering significant harm.</p> <p>Early help staff are engaged on the GCP 2 training and are using the tool in practice.</p> <p>To review, analyze and then report to the Executive and Board in relation to performance data provided through early help services.</p> | <p>assurance reporting when requested that evidences that they are fulfilling their duties and responsibilities to safeguard and promote the welfare of children, identify any concerns and risks and what is being done to improve this.</p> <p>Engage fully in multi-agency case audits as identified.</p>   |
| <p><b>Case Review (including child death reviews and serious case reviews)</b></p> | <p>Ensure the actions identified from previous SCR's and PLR's into childhood neglect cases are properly embedded within LSCB training (link to workforce development sub group) and, action plans are properly completed.</p> | <p>Identify opportunities to review Herefordshire partnership response to 'peer on peer' abuse and identify/disseminate any learning for partner agencies.</p>   | <p>Ensure learning from SCR's and PLR's is appropriately used to improve the journey of the child through the child protection process.</p> | <p>Use Child Death Overview Panel learning to influence partnership activity to address modifiable risk factors to reduce the likelihood of future child deaths.</p>  | <p>Partner agencies:</p> <p>Refer appropriately to the JCR cases that they think may fit the criteria for a case review.</p> <p>Respond in a timely manner to requests for information in relation JCR and CDOP</p> <p>Produce high quality IMR's when requested, and in a timely manner</p> <p>Engage fully in the case review process and lessons to learn and actions identified.</p> |

**The Voice of the Child and Family:** in all areas of working with children and families the board wants to be assured that the voice of children and families is heard, recorded and taken account of in the provision of services.

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| <p><b>ALL sub groups as appropriate:</b></p> <p><b>Voice of the child/family</b></p> | <p>The evaluation of the GCP2 should include the views and experiences of children, young people and their families.</p> | <p>Secure qualitative feedback from victims of CSE and their families in relation to the services received/experience of agencies to inform improvement in service.</p> | <p>Receive feedback from children and young people who are subject to a child protection plan or who are looked after, to understand the effectiveness of the local safeguarding system.</p> | <p>Receive feedback from children, young people and their parents/carers about their experience of accessing and receiving early help (including Families First).</p> | <p>The HSCB will expect partner agencies to feed back to the board any views of children and families regarding services they have received, and what agencies have done as a result of this (this may be through sec 11 audits, assurance reporting or other mechanisms agreed by the board). HSCB multi-agency case audits; case reviews, and other HSCB activity where appropriate, will include analysis of the voice of the child / family.</p> |
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In addition to the priorities noted above discussions at the HSCB Executive Group, following the HSCB development day agreed for an additional area to be included in the Boards Strategic plan, the topic being **Strong Leadership; Strong Partnership**, details of this are outlined below:

### **Strong Leadership- Strong Partnership:**

All partner agencies in Herefordshire have a duty to safeguard and promote the welfare of children and young people in their area. It is a given, through findings from enquiries, inspections and research, and outlined in “Working Together to Safeguard Children” (2015), that the best way of achieving this is through effective joint working. To fulfil the duties to monitor and ensure that joint working is effective we do this through the mechanism of the HSCB. For this reason all the HSCB partners wanted to be assured that this system was working as effectively as possible and there was full engagement in all the essential processes. The key outcomes and actions in this plan are designed to help us demonstrate **Strong Partnership**, which is an essential part of ensuring strong and effective working together to safeguard children and young people.



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| <b>Meeting:</b>         | <b>Cabinet</b>  |
| <b>Meeting date:</b>    | <b>Thursday 12 April 2018</b>                                       |
| <b>Title of report:</b> | <b>Corporate delivery plan 2018/19</b>                              |
| <b>Report by:</b>       | <b>Deputy Leader; Cabinet member finance and corporate services</b> |

### **Classification**

Open

### **Decision type**

Non-key

### **Wards affected**

(All Wards);

### **Purpose and summary**

To agree the activities within the corporate delivery plan 2018/19.

### **Recommendation(s)**

That:

- a) the draft corporate delivery plan 2018/19 at Appendix 1 be approved; and
- b) the assistant director environment and place be authorised to make presentational changes to the approved corporate delivery plan 2018/19 prior to publication, following consultation with the cabinet member finance and corporate services.

### **Alternative options**

1. Cabinet may: amend or revise the proposals, but in doing so regard must be made to ensuring any changes continue to demonstrate how the corporate plan 2016-2020 is to be implemented and that the proposals can be delivered within the agreed budget.

## Key considerations

2. The council's corporate delivery plan is designed to demonstrate how the priorities for the council will be delivered during the coming year, by articulating the key activities to be completed during the coming 12 months (along with the measures that will be used to record progress/achievement towards meeting those priorities).
3. The corporate delivery plan 2018/19 is attached at appendix 1. It is aligned to the four corporate priorities agreed in the corporate plan 2016-2020 that direct and underpin everything that we do:
  - enable residents to live safe, healthy and independent lives;
  - keep children and young people safe and give them a great start in life;
  - support the growth of our economy; and
  - secure better services, quality of life and value for money.
4. The corporate delivery plan 2018/19 is a key document in helping us ensure that the council has a co-ordinated approach across all directorates to delivering these four key priorities. The delivery plan will remain a live document and will continue to evolve through the year, enabling cabinet to assure itself that resources are being appropriately applied to meet these priorities.
5. Progress in achieving the activities identified as part of the corporate delivery plan 2017/18 has been monitored on an ongoing basis and final outturn will be reported to cabinet as part of the end of year budget and performance report. Any activities that have not been completed have been incorporated into this year's corporate delivery plan.
6. Progress in achieving the priorities will be monitored on a regular basis and will be discussed as part of the performance challenge sessions, and reported to cabinet and management board as part of the quarterly budget and performance report.

## Community impact

7. In accordance with the adopted code of corporate governance, Herefordshire Council achieves its intended outcomes by providing a mixture of legal, regulatory and practical interventions. Determining the right mix of these is an important strategic choice to make to ensure intended outcomes are achieved. The council needs robust decision-making mechanisms to ensure our outcomes can be achieved in a way that provides the best use of resources while still enable efficient and effective operations. The corporate delivery plan 2018/19 demonstrates how the council intends to achieve its vision for the people of Herefordshire, and continues to draw from the evidence base available through Understanding Herefordshire.

## Equality duty

8. Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:

A public authority must, in the exercise of its functions, have due regard to the need to -

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;



- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 9. The Equality Act 2010 established a positive obligation on local authorities to promote equality and to reduce discrimination in relation to any of the nine 'protected characteristics' (age; disability; gender reassignment; pregnancy and maternity; marriage and civil partnership; race; religion or belief; sex; and sexual orientation). In particular, the council must have 'due regard' to the public sector equality duty when taking any decisions on service changes.
- 10. Increasing equality of opportunity and access, and reducing inequalities, underpin the corporate plan, and consequently the corporate delivery plan. Individual elements of activity within the corporate delivery plan will undergo equality impact assessments as an integral part of their planning and implementation.

## **Resource implications**

- 11. There are no direct implications arising from this report. The resource implications of any decisions necessary to implement activities within the corporate delivery plan will be set out within the relevant decision report. Proposals within the corporate delivery plan 2018/19 will be delivered within the budget agreed by Council on 26 January 2018, and include activities to deliver the savings required for a balanced budget.

## **Legal implications**

- 12. There are no legal implications arising directly from the recommendations of this report. The legal implications of any decisions to be taken by the executive in implementing the corporate delivery plan will be set out within the relevant decision report; while the plan itself sets the direction of travel, specific activities identified within the plan will require specific decisions of the executive as and when they are brought forward for detailed consideration.

## **Risk management**

- 13. The corporate plan and delivery plan are integral elements of the council's performance, risk and opportunity management framework (PROM). Risks associated with each objective and project are entered onto the relevant service or directorate risk register and escalated as appropriate. The corporate risk register is a living document and is reviewed regularly by management board and cabinet.
- 14. The financial challenge and capacity to deliver on our priorities, whilst delivering the necessary savings, remains a significant risk; this will be mitigated by applying our Performance, Risk and Opportunity Management Framework ensuring that there is regular monitoring.

## **Consultees**

- 15. None.

## **Appendices**

Appendix 1 corporate delivery plan 2018/19

## **Background papers**

None.

## Corporate Delivery Plan 2018-19

### Projects

#### Enable residents to live safe, healthy and independent lives

**Our focus is on enabling people to stay well in their own home, supported by and contributing to their community, delivering the vision set out by the Herefordshire Health and Wellbeing Strategy. Where people do need additional support, we will ensure this is provided in ways that maximise their independence, choice and control.**

#### What we will do

##### Staying Well at Home

- Support people to stay warm and healthy at home by providing access to programmes to insulate older buildings and contribute to paying fuel bills for certain vulnerable groups. Reducing fuel poverty is one of the priorities set by the Health and Wellbeing Board.
- Support the improved public health of the Herefordshire population, through the delivery of a sustainable Healthy Living Network, improved delivery of the Healthier You Diabetes Prevention Programme and increased uptake of the NHS Health Checks Programme.
- Introduce and deliver the new Housing Allocation Policy and attendant procedures for accessing social housing.
- Maximise use of Disabled Facilities Grants to support people to remain living in their own homes with appropriate advice, equipment, adaptations, technology and essential repairs.
- Make significant progress in establishing Wellbeing Information and Signposting in Herefordshire (WISH) as the first port of call for online health and well-being information across the whole system. Supporting the development of resilient communities across the county is one of the priorities of the Health and Wellbeing Board.

##### Targeted Support

- Meet new legislative requirements within the Homelessness Reduction Act and work together with nominated agencies to assist with homelessness prevention and relief.
- Enhance the Rough Sleeper Outreach Service to work towards our ambition of eradicating rough sleeping in Herefordshire.
- Resettle a further 35 refugees in family groups, whilst also joining the general asylum dispersal programme involving arrivals of the first families seeking asylum.
- Develop and implement key strategies relating to people with Autism, and Learning Disabilities; including reducing avoidable deaths via the Learning Disabilities Mortality Review (LeDeR) programme.
- Commission services that support people with dementia or are at the end of their lives, so that they can remain independent and at home for as long as possible. This is one of the priorities set by the Health and Wellbeing Board.
- Commission new services for carers, implementing the Joint Carers Strategy and promoting an enabling approach including new networks for mutual and self-help and ensuring universal services are carer aware and responsive.

##### Care Provision

- Work with partners across the health and care system, through the One Herefordshire group, to ensure services are integrated around the needs of residents. We will support delivery of the Sustainability & Transformation Partnership plan and the development of the integrated care system for Herefordshire & Worcestershire.
- Support and shape the local adult social care provider market; including domiciliary care and supported living providers, and residential care and nursing care homes.

## Keep children and young people safe and give them a great start in life

**We are committed to the delivery of the Herefordshire Children and Young People's Plan and our corporate plan sets out how we will do this. The Children and Young People's Plan is being refreshed this year and we will contribute to the emerging key objectives of all partners.**

### What we will do

#### Improving children's health and wellbeing

- Improve health and wellbeing of all children and their families, particularly focusing on good dental health and reducing obesity. This is one of the priorities set by the Health and Wellbeing Board.
- Align services and stimulate the market, including raising awareness of mental health issues as part of the council's contribution to the development of an all age mental health pathway for Herefordshire.
- Work with partners to ensure robust pathways in place for maternal and perinatal mental health.

#### Helping all children and young people succeed

- Challenge and support schools and settings, through work with leading head teachers on the Herefordshire School Improvement Partnership, to achieve top quartile results for their pupils.
- Hold schools and settings accountable for the attainment and progress of pupils who are entitled to free school meals (FSM) or those that have been eligible for FSM in the last six years (Ever 6) supported by the pupil premium, and those who are Looked after children (LAC), through the council's learning and achievement team's risk assessment and forward target-setting processes.
- Work with partners to widen the range of opportunities available to young people in post 16 education so that the numbers in education, training or employment in Herefordshire increase.

#### Keeping children and young people safe, in supportive family environments

- Develop our targeted approach for Early Help with partners to reduce the reliance on high threshold services, and refresh our early help strategy.
- Work as part of the Herefordshire Safeguarding Children Board (HSCB) to ensure that all professionals understand and implement the HSCB Neglect strategy and training.
- Ensure that child protection decisions are informed by evidence of impact upon the child through revised case conference guidance.
- Develop our approach to children in need so that they receive the right support and do not need to rely on statutory services for longer than necessary.

#### Building up child-friendly communities

- Implement the accommodation strategy for vulnerable young people and establish a new preventative homelessness pathway. Introduce protocols and housing options to support young people with complex cases into independence.
- Develop link workers to help families navigate the multi-disciplinary systems and processes associated with disability.

## Support the growth of our economy

**Our Economic Vision identifies the ambitions and intentions of a range of stakeholders and partners, to help make Herefordshire an even better place to live, work and learn. We will apply a strategic, integrated approach to planning, funding and delivering improved infrastructure to support the economic growth of Herefordshire, creating more and better jobs.**

### What we will do

#### Improve the infrastructure

- Commence construction of phase 1 of the bypass with the southern link road, and identify preferred route for the Hereford bypass as part of the Hereford Transport Package.
- Progress developments within Hereford City, including improvements to the Edgar Street ground, enabling works to commence on the GP super surgery and progressing a city centre multi-storey car park.
- Undertake major investment in maintaining the county highway assets to continue to repair roads and support economic development.
- Progress phase 2 of fibre broadband delivered by Gigaclear in rural Herefordshire and BT in Hereford city.

#### Develop the economy

- Deliver the Hereford Enterprise Zone delivery plan, commence work on site at the Shell Store incubation centre, ensure the commencement of the cyber security centre and construct two commercial buildings on the Enterprise Zone.
- Support the new NMITE University in Hereford to draw down government funding and provide sites for accommodation.
- Commence development of student accommodation for those in higher education in the city.
- Establish a pipeline of development projects and submit planning applications for key public sector sites, including Station Approach Hereford and the former depot site at Bromyard.
- Continue to develop the detailed planning policies to support housing and economic growth, including progressing the development of the Hereford Area Plan and the Minerals and Waste Local Plan to submission to the Secretary of State, adopting the Travellers sites Development Plan Document and increasing the number of adopted Neighbourhood Development Plan Documents to 45.
- Commence first phase of development of the Ross Enterprise Park.
- Contribute to the wider workforce challenges in the care sector through a targeted local campaign and resources to support the recruitment and retention of workers across the sector.

#### Ensure access to housing

- Seek to acquire new sites to encourage new housing development within the county.
- Continue significant development of affordable and social housing through planning gain and the strategic development partnership, also contributing to accommodation for vulnerable people and analysis of projection of population and demographic changes.

## Secure better services, quality of life and value for money

**We will be an efficient, effective and productive council, open and transparent in all we do, making best use of our people, our buildings and our other resources so as to enable the achievement of our priorities and provide the best possible service to our residents.**

### **What we will do**

#### Efficient use of resources

- Make the most of the property held by the authority by shared and dual use and reduce the cost.
- Effectively deliver the Medium Term Financial Strategy (MTFS), and implement change to the Capital Budget process to improve transparency and accountability.
- Further improve commissioning and procurement to deliver greater revenue efficiencies and savings.
- Implement a workforce strategy which ensures we have an appropriately skilled workforce to meet the changing needs and demands of the council and an agile, flexible and resilient workforce.
- Agree and deliver future operational models for the Museums, Libraries & Archives Service.

#### New governance

- Ensure compliance with our statutory responsibilities in relation to data protection, elections and cyber security.

#### Improved customer service

- Support customers to engage with the council through digital interaction.

## **Measures**

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| <b>Enable residents to live safe, healthy and independent lives</b>  |
| <b>How we will measure progress</b> <ul style="list-style-type: none"><li>• Increase the take up of the NHS Health Check programme.</li><li>• Reduce the rate of younger adults needing permanent placements in residential and nursing care homes (aged 18-64).</li><li>• Reduce the rate of older people needing permanent placements in residential and nursing care homes (aged 65+).</li><li>• Reduce the rate of delayed transfers of care from hospital which are attributable to adult social care.</li><li>• Increase the proportion of older people who are still at home 91 days after discharge from hospital into reablement/rehabilitation services.</li><li>• Increase the number of affordable housing units delivered.</li><li>• Reduce the number of households in temporary accommodation.</li><li>• Improve the overall satisfaction of people who use services with their care and support.</li><li>• Maintain, and seek to improve still further, the quality of life for people with care and support needs.</li><li>• Increase the amount of informal support received by people within their communities as an alternative to formal social care.</li><li>• Maintain the proportion of people using social care services who receive a direct payment.</li><li>• Increase the proportion of clients in receipt of long term social care that are reviewed.</li><li>• Maintain the proportion of completed safeguarding enquiries where the clients' safeguarding outcomes are met.</li><li>• Reduce the proportion of households experiencing fuel poverty.</li><li>• Number of assets and services transferred.</li><li>• Reduce the number of anti-social behaviour incidents.</li><li>• Increase the proportion of hate crime incidents that are reported.</li></ul> |
| <b>Keep children and young people safe and give them a great start in life</b>   |
| <b>How we will measure progress</b> <ul style="list-style-type: none"><li>• Reduce the attainment gap at age 16 between vulnerable group and their peers.</li><li>• Increase the proportion of pupils attending a school and or setting that is good or outstanding: primary / secondary.</li><li>• Herefordshire Children are at or above the national comparative indicator of attainment and progress at 16.</li><li>• Improve education outcomes at age 5.</li><li>• Improve health outcomes for 0-5 year olds and 5-19 year olds.</li><li>• Reduce the proportion of early years children with dental disease.</li><li>• Reduce the percentage of referrals received that do not require a children's social care.</li><li>• Reduce the number of children looked after by the local authority.</li><li>• Reduce the use of emergency bed and breakfast accommodation for young people at risk of homelessness.</li><li>• Increase the number of 16 and 17 year olds sustaining a place in education, training or employment including apprenticeships.</li><li>• Reduce the number of children subject to child protection plans.</li><li>• Increase the number of children that take part in the summer reading challenges.</li></ul>   |
| <b>Support the growth of our economy</b>   |
| <b>How we will measure progress</b> <ul style="list-style-type: none"><li>• Reduce the amount of household waste per person (kg) per year.</li><li>• Minimise the number of people killed and seriously injured in road traffic collisions in Herefordshire.</li></ul>   |

- Percentage of Category 1 defects (immediate or imminent hazard) and 2a defects made safe/dealt with within target times.
- Improve average journey time in Hereford in morning week-day peak period.
- Proportion of premises with super-fast broadband.
- Percentage of Major planning applications dealt with within 13 weeks (24 month rolling) – Target 60%.
- Percentage of Non-major planning applications (minors/others) dealt with within 8 weeks (24 month rolling) Target increased to 70%.
- Percentage of working age population in employment.

### **Secure better services, quality of life and value for money**

#### **How we will measure progress**

- Reduce workforce costs (including agency costs).
- Reduce sickness absence (12 month rolling).
- Rateable value of new Business Rates registrations.
- Spend to the Council's Revenue budget (forecast and variance).
- Spend to the Council's Capital budget (forecast and variance).
- Progress against delivery of savings targets.
- Reduction in H&S related reported accidents.
- Website satisfaction: Percentage of visitors that confirm they were able to set out what they wanted to do in a satisfaction survey.





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| <b>Meeting:</b>         | <b>Cabinet</b>  |
| <b>Meeting date:</b>    | <b>Thursday 12 April 2018</b>   |
| <b>Title of report:</b> | <b>Construction and Facilities Management Services to Herefordshire Council</b> |
| <b>Report by:</b>       | <b>Cabinet member contracts and assets</b>                                      |

## Classification

Open

## Decision type

Key

This is a key decision because it is likely to result in the council incurring expenditure which is, or the making of savings which are, significant having regard to the council's budget for the service or function concerned. A threshold of £500,000 is regarded as significant.

Notice has been served in accordance with Part 3, Section 9 (Publicity in Connection with Key Decisions) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

## Wards affected

(All Wards);

## Purpose and summary

The amalgamation of the council building maintenance and cleansing services contract, to be procured through an open market tender exercise. The contract period is for one year from 1 September 2018 to 31 August 2019.

The short term contract will provide a timeline for a strategic service redesign of these services to align with the council's needs and corporate objectives. This project will be undertaken in conjunction with the short term contract.

## Recommendation(s)

That:

- (a) an amalgamated property maintenance and cleansing service be procured for a one year period from 1 September 2018 – 31 August 2019; and
- (b) the chief finance officer be authorised, following consultation with the cabinet member contracts and assets, to award a contract to the successful provider following tender evaluation, with a contract value of up to £12M.

## Alternative options

1. To procure a longer term contract; this option is not recommended as a strategic service redesign is scheduled to be undertaken in spring 2018, to ensure the council procure the most efficient and effective strategic service going forward.
2. Not to procure the service; this option is not recommended as the council have outsourced this service and require a contracted provider to be in place to deliver continuous service provision.
3. To transfer the services into the public realm contract; this option is not recommended as the council are seeking to undertake a fundamental service redesign and would therefore need to extract the service from the public realm contract to procure the service going forward and this would create unnecessary cost and work. This option will be considered should the procurement exercise be unsuccessful.

## Key considerations

4. The current maintenance service contract is delivered by Integral UK Ltd and the building cleansing service contract is delivered by Interserve UK Ltd; both contracts were awarded in September 2013 and following final permitted extension are due to expire on the 31 August 2018.
5. A high level review of the services has been undertaken and consideration given to the strategic needs of the council. A short term contract for one year will enable a full strategic review, service redesign and a procurement process to be undertaken. This is to ensure the council utilise the most effective and efficient model for service delivery.
6. The amalgamation of the two service contracts will deliver a more streamlined service, potential efficiencies through a reduction in provider management requirements, improved service consistency and continuity, and will be more attractive to providers in the market.
7. The one year contract will ensure consistent service, with the delivery of key day to day maintenance and the required regular testing and servicing of plant and equipment and the delivery of cleaning to council offices and buildings.
8. The contract value has been reviewed to align with budgets for 2018/19, the contract has the potential to be utilised to deliver the capital projects relating to council owned property and to a value of up to £250,000 per project. Any projects will be subject to the council's standard governance process before any projects are progressed.

9. The contract will be based on the **New Engineering Contract (NEC)**, or NEC Engineering and Construction Contract. It is a formalised system created by the Institution of Civil Engineers that guides the drafting of documents on civil engineering and construction projects. The contract provides clear visibility of delivery, cost and an early warning culture for positive partnership working and effective management of budget. The council's contract management team's portfolio consists of infrastructure and construction contracts, which have well established processes and procedures for NEC3 contracts, along with a newly designed and mobilised ICT system for change control.
10. The contract is non-exclusive and the model sets out clear payment option mechanisms; Cost Reimbursable (sometimes called cost plus) is one in which the contractor is reimbursed the actual costs they incur in carrying out the works, plus an additional fee. This option is for works that are emerging or unable to define and the council hold the risk. Target Cost is agreed between the provider and council, this includes the provider's estimate of what are called "Defined Costs" plus a fee which covers the provider costs, overheads and profit. This option is shared risk between the provider and council and incentivises through pain or gain share. Lump Sum is a fixed price and interim payments are based upon the completion of activities which are included in an activity schedule. With this option the providers holds the risk and incentivises through pain or gain. Each commission will be reviewed to establish the most effective payment mechanism to provide effective cost management.
11. The council will be managing the contract and will undertake regular service reviews for continuous improvement and demonstrate value for money. This will include the provider's supply chain and subcontractors. Findings and outcomes will be shared for learning and implementation at contract level with any significant findings presented to the council's management board for cross directorate learning and improvements.
12. The contract will set out key performance indicators to monitor the performance of the service, this will be reviewed on a monthly basis through contract operational meetings. A robust contract governance will be set out in the contract for clear routes of escalation and reporting.
13. The tender will be evaluated on a cost and quality basis, with 60% quality and 40% cost, due to the contract model, with quality questions included in the invitation to tender (ITT) being given marks which will form the basis of the quality evaluation.
14. The council will undertake market engagement in early April in preparation for the tender going out to the market. Providers have already shown an interest in the one year contract and it is anticipated tenders will be submitted
15. The proposed procurement timetable for the one year contract is:
  - Out to tender: 20 April 2018 (30 days)
  - Tender evaluation: 22 May (10 days)
  - Contract Award: 18 June
  - Mobilisation: 18 June – 31 August 2018
  - Commencement of new contract: 1 September 2018

16. As part of the new contract further work will be undertaken to improve the council's asset management for buildings, in partnership with the incoming provider, which will be utilised and tested in contract and in readiness for the strategic contract procurement in due course.
17. The strategic review of the council's future service needs will be undertaken in conjuncture with the new contract. The review will include benchmarking and horizon scanning with other councils and service providers. Once all options have been fully tested and a preferred contract model has been identified, market engagement sessions will be held to gain further information and prepare the market for the tender. This work will be supported by a consultant to ensure the timeframes are met and the correct level of resource is provided for a short period.
18. The proposed procurement timeline for the strategic contract is:
  - Benchmarking & horizon scanning: April – June 2018
  - Service redesign and modelling: June – September 2018
  - Cabinet decision: October/November 2018
  - Market Engagement: January/February 2019
  - Out to tender: March 2019
  - Tender evaluation: April 2019
  - Contract Award: Late April 2019
  - Mobilisation: 1 May – 31 August 2019
  - Commencement of new contract: 1 September 2019

## **Community impact**

19. The services delivered are critical to the council to enable it to ensure that its buildings are maintained in a condition that is safe for community users and staff. This contract enables Herefordshire Council to react to these requirements in a timely and cost effective way.
20. Effective asset management, by using the contract will ensure the council are spending funding on areas which will have the most positive impact for individuals utilising the buildings and are in line with corporate objectives.
21. The council has a duty of care to ensure the safety of the users of our buildings both visiting public and our staff, this contract enables the council to comply with these duties.
22. The contract will be used to ensure statutory compliance of our asset by providing the vehicle to deliver the appropriate servicing and inspection regime. This will enable compliance with all relevant Health and Safety legislation.

## **Equality duty**

23. Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:
 

A public authority must, in the exercise of its functions, have due regard to the need to -

  - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
24. The public sector equality duty (specific duty) requires us to consider how we can positively contribute to the advancement of equality and good relations, and demonstrate that we are paying 'due regard' in our decision making in the design of policies and in the delivery of services. The successful provider will be made fully aware of their contractual requirements in regards to equality legislation. This decision will have no negative impact on the council or providers compliance with this duty.

## **Resource implications**

25. The annual contract value is up to £12M. There are three key areas of spend, as detailed below. The contract value allows the provision of additional capital projects, should funding be available:
- (i) the provision of planned and reactive building maintenance service £2.1M – Revenue budget
  - (ii) the provision of building cleaning service £750,000 – Revenue budget
  - (iii) the provision of council building renovation/improvement projects £4.5M- Capital budget
26. All capital projects will be subject to the council's due governance requirements and individual decision notices, as required.
27. Expenditure in relation to construction services covers both revenue and capital elements. Expenditure in recent years has varied in line with demands placed upon the service (for example reflecting severe weather conditions) and delivery of major projects.
28. The services are subject to TUPE for the existing contractor's staff and the TUPE information has been requested from the current providers and will be issued as part of the procurement process.

## **Legal implications**

29. In common with all occupiers and landowners, the council has legal duties under legislation (including the Health and Safety at Work Act 1974 and the Building Act 1984), as well as under common law of negligence, to maintain its properties to a safe standard of repair and hygiene. Therefore the services proposed in this report should be regarded as essential to the council.
30. The procurement route recommended in this report is compatible with the requirements of the Public Contracts Regulations 2015. Additionally the competitive tendering exercise, coupled with robust performance management under the NEC3 contract model, should enable the council to demonstrate that it is meeting its statutory duty to secure best value in the delivery of these contracted services.

## Risk management

31. Risks are being managed throughout this procurement process and a risk register is in place with appropriate mitigation identified. A number of key risks have been identified which are set out below:

| Risk / opportunity  | Mitigation  |
|---|---|
| Satisfactory tenders may not be submitted   | Market engagement in early April is scheduled and providers have already indicated interest in the contract   |
| TUPE. The mobilisation period would normally be three months to support TUPE but due to the timeframe available mobilisation will need to be completed within two months. | The council is working closely with the current provider who is aware of the timeframes and will support the incoming provider with the reduced timeframe through as early effective engagement as possible               |
| Delay achieving the target commencement date due to the compressed timetable for procurement and mobilisation   | The council will support the appointed provider with mobilisation through a project management approach and apply sufficient resources to ensure that the target commencement date can be met                             |
| Ensuring value for money is achieved  | Value for money will be tested at various stages of the commissioning process and the partnership will review ways to improve value for the council.  |
| Good quality effective service is continuously delivered  | Performance will be closely monitored through Key Performance Indicators, to ensure services are delivering to target and continuously improved, where possible.  |
| Slippage to the procurement timetable   | Additional resources have been allocated to the process and technical support is available to ensure the procurement proceeds to plan. Soft market engagement has started and there is a positive response from providers |
| Potential negative perception of the council  | A robust approach to mobilisation planning is being incorporated into the procurement   |

if service isn't continuous.

to ensure the provider puts in place service delivery arrangements for the complete range of services to be provided. This will include clear communication plans to explain the new arrangements to our customers and stakeholders.

## Consultees

32. Political groups have been consulted with as part of this decision and no comments or objections were received.
33. Soft market engagement has started and will continue to inform the service going out to market. Consultation has been undertaken with key clients from Herefordshire Council which have indicated there is an opportunity to improve a streamlined service. Wider consultation will be undertaken as part of the strategic service redesign.

## Appendices

None

## Background papers

None







|                         |  |
|-------------------------|--|
| <b>Decision maker:</b>  | <b>Cabinet</b>   |
| <b>Decision date:</b>   | <b>Thursday 12 April 2018</b>  |
| <b>Title of report:</b> | <b>Proposed redesign of the Allocations arrangements for Herefordshire</b> |
| <b>Report by:</b>       | <b>Cabinet member finance, housing and corporate services</b>              |

## Classification

Open

## Decision type

Key

This is a key decision because it is likely to be significant having regard to: the strategic nature of the decision; and / or whether the outcome will have an impact, for better or worse, on the amenity of the community or quality of service provided by the authority to a significant number of people living or working in the locality (two or more wards) affected.

Notice has been served in accordance with Part 3, Section 9 (Publicity in Connection with Key Decisions) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

## Wards affected

All Wards;

## Purpose and summary

To approve the proposed redesign of the allocations arrangements for Herefordshire.

The council has a range of statutory obligations in relation to allocations, although as it holds no housing stock, the direct control of lettings to tenants rests with social housing landlords.

Current arrangements for allocations are managed through Home Point, which is a single integrated form of choice based lettings system (CBL) where applicants on the housing register bid for social housing. Providers have indicated their wish to move away from an integrated system and to manage more of the process themselves.

Following discussions with providers, an agreed approach has been identified for the redesign of allocations. It involves each provider making their own arrangements for advertising properties and managing lettings. The council will operate the register, monitor how housing need is met by lettings and transfer data to providers so that customers can either be nominated directly for properties or bid for them on provider websites.

The anticipated benefits include:

- choice for customers who will be able to apply both to the council and directly to the providers;
- more information about the different tenures available within the housing stock of providers including private market rental and low cost home ownership;
- better access to information through more modern and interactive technology;
- more effective monitoring of the nomination arrangements and the council's statutory duties;
- flexibility for providers to try to ensure that all their housing stock is fully let.

The council's role will be focused more specifically on fulfilling its statutory duties around allocations. The separation of component parts of the process requires new and more complex solutions for data transfer and the council is commissioning a new IT system to support this which has been the subject of a separate decision. The council will also have to operate two different nomination/transfer arrangements to reflect the different approaches of two groups of providers. There will be nomination agreements between the council and each provider to help regulate arrangements, following dissolution of the Home Point partnership

There is a detailed project plan and process to support the changes and it is intended that they will be implemented between October and December 2018. The allocations redesign, if approved, would also require the further revision of the allocations policy adopted in March 2016 and an item on this issue appears elsewhere on the cabinet agenda today.

## Recommendation(s)

That:

**(a) the following new arrangements for allocating social housing be approved for implementation by 1<sup>st</sup> October 2018 within the existing budget:**

- **the closure of the Home Point system and brand**
- **the separation of the housing register from the advertising of properties and the management of bidding and the discharge of the council's duty to nominate people and monitor allocations through multiple arrangements, including automatic data transfer.**

## Alternative options

1. Make no changes to housing allocations arrangements. This option is not recommended as housing providers have confirmed they will not continue to use the current home point arrangements and the council cannot compel or require them to work in a particular way. Such an approach would lead to a breakdown of any organised means of ensuring that people in housing need get housing and would be likely to lead to rapid increases in homelessness and significant regulatory and reputational risk to the council

2. Make changes to improve the existing allocations arrangements but continue with a single integrated CBL system. This option is not recommended as the majority of housing providers have made clear that this would not be an acceptable course of action and it cannot be imposed upon them. The consequences of such an approach would be similar to those in paragraph 1.

## Key considerations

3. Although the council holds no housing stock the allocation of social housing is one of the core functions of the council in its role as strategic housing authority. It is the process which determines and manages who amongst local people can gain access to social housing. This may have a fundamental impact on the lives of individuals and families, the wider local economy and social wellbeing. It also ensures that housing associations (housing providers) can let their properties and secure their income while enabling the council to fulfil its statutory duties.
4. The allocation of social housing is governed by Part 6 of the Housing Act 1996 (as amended). The council must adopt and operate an allocations policy which sets out local priorities and the application of national priorities or “reasonable preference” categories. It is not obliged as such to operate a housing register, but must be able to nominate people with housing need in priority order. Operation of a housing register is the only really practical way to fulfil this part of the duty. The council also has various duties to monitor and report upon who gets what social housing and performance of the system overall.
5. The law provides that the landlord determines to whom it lets specific properties. Landlords can assign that right to the council, for example by accepting 100% nominations for its properties, but this is rare among larger stockholding providers. In many other areas, the council retains at least some housing stock, but this is not so in Herefordshire. Choice based lettings schemes (CBL) such as Home Point are not required by law but they have been adopted widely by councils as a business or service choice.
6. In Herefordshire, housing allocations are managed currently through Home Point, the local brand name for a single integrated form of CBL. CBLs enable people on the housing register to bid for properties and rely on this bidding, rather than controlled nomination by the council as the means of selecting potential tenants for properties. The council manages most aspects of the process on behalf of housing providers, including advertising properties, checking eligibility and assessing applications, co-ordinating bidding and monitoring outcomes. Providers have contributed to the council’s costs of staffing Home Point and of the IT system which supports it. Housing providers decide which bidder is offered the tenancy for each property and this person may not be the household with the highest priority banding or housing need. This may be due to the rules relating to “bedroom need” of applicants, but more frequently the providers’ exclusions policies.
7. There is widespread evidence of sustained and growing need for social housing. The numbers on the housing register have increased steadily since July 2014 and stand currently at around 1,200, although review of inactive applications is now being undertaken. In addition, the register does not capture the need for targeted, supported housing which is often allocated outside the formal allocations process. Needs data indicates that numbers of these forms of social housing need to increase by at least 70 units annually.
8. Providers each operate lettings and exclusion policies which indicate their priorities but particularly how they manage risk; to their property, their existing tenants and their income. Whilst providers are also obliged to follow the council’s allocation policy, the two policies

may sometimes be in conflict, leading applicants from the housing register to be excluded from tenancies despite having a high priority banding. Some providers apply exclusions for extended periods where bidders have a history of either debt including rent arrears or antisocial behaviour/offending. This misalignment of policies raises the possibility of legal challenge to both the council and housing providers, but cannot necessarily be addressed fully by proposed changes to allocations arrangements.

9. The council publishes and revises from time to time an allocations policy setting out local and national priorities and also providing a practical description of how local allocations arrangements will operate. In recent times the implementation of allocations policy for Herefordshire has been complicated by practical factors and implications. The policy was revised in 2016 to re-balance numbers and needs and ensure statutory compliance, but could not be implemented once housing providers signalled their intention to change allocations arrangements away from Home Point. Now those changes have been negotiated, further revisions to the 2016 policy are required. The revised allocations policy for 2018 is the subject of a separate decision for cabinet.
10. The Home Point scheme has operated as the means of managing allocations locally since 2002, its introduction coinciding with the council's transfer of the last of its social housing stock and the creation of Herefordshire Housing Limited (HHL), now part of Connexus. This was the third and largest Large Scale Voluntary Transfer of council stock (LSVT), others having taken place in 1994 and 1996 by predecessor councils to providers now known as Stonewater and Fortis Living. LSVTs were quite commonplace during this period, although Herefordshire is amongst a minority of councils to have transferred all of their stock. Councils faced powerful disincentives to retaining stock, including great restrictions on repairs and maintenance and capital investment. LSVTs required the majority support of tenants. The level of control over LSVT providers expected by councils evolved over time and these are greater in the case of HHL than those earlier, but this is balanced by the LSVT with HHL being fixed term. Whilst the council exerts some control over provisions for right to buy and property disposals, these will expire in 2020.
11. By September 2016 the larger housing providers, accounting for around 90% of housing stock, announced their intention to change allocations arrangements to move away from a single integrated system and the Home Point brand and model. They expressed reducing confidence in the ability of current arrangements to ensure their properties were appropriately let and meet the needs of customers. Providers cited concerns about;
  - the cost of Home Point,
  - the lack of choice,
  - the general experience for customers including the dated look and feel of the online experience.
12. There was particular concern about the increasing difficulty in letting properties and more control was sought over advertising and the management of bids from customers. The council indicated its willingness to work with providers to change or improve arrangements and accepted the fairness of some of the concerns. However, it has pointed out that the revised allocations policy 2016 would have addressed key causes of increasing hard to let numbers but its implementation has been delayed by providers' challenge to allocations arrangements. Nonetheless, providers remained concerned about issues relating to choice, customer experience and cost and affirmed their intention to leave Home Point and redesign arrangements.

13. Negotiations among the providers and with the council have taken place to agree a redesign of allocations arrangements which would allow both the council to fulfil its duties and housing providers to address their concerns. Discussion focused particularly on two key challenges:
- a) how information on registered applicants and lettings can be exchanged effectively and lawfully between multiple IT systems.
  - b) the nature of the pathway or journey for customers and how it is communicated coherently to improve outcomes and minimise confusion.
14. Joint consultation was undertaken with tenants, applicants and the wider public in 2017 which indicated support for increased choice and flexibility despite the potential complexity of pathways. The council has also undertaken an internal audit of Home Point systems and processes and will adopt learning from it in finalising the detail of new arrangements. The audit concluded that some aspects of the Home Point process worked effectively and identified some issues to be addressed, including;
- Providers should ensure that when applicants are housed the register team is informed so that they can be removed.
  - Issues around submission and review of supporting documents would be resolved
  - It is important for annual reviews to be completed for all registered applicants to ensure the register is fully updated.
  - There should be more comprehensive reporting of Home Point performance within council processes.
  - Providers must provide explanation where a bid is “skipped” by a provider.
15. Proposals for the redesigned allocations arrangements to operate from August 2018 include;
- Providers will advertise properties independently and will be free to receive bids directly from the public, as well as from people on the housing register.
  - Providers will be bound by nominations agreements to let a proportion of properties to applicants on the housing register.
  - The council will operate the register, nominate and transfer data on applicants to providers and monitor the letting of properties and performance of the system overall.
  - Three of the larger providers, accounting for about 80% of housing stock, will advertise and manage their lettings through an online service, Home Hunt. The council will transfer housing register data to Home Hunt automatically, so that applicants will also be registered on that website and can bid for those providers’ properties.
  - Data transfer will minimise the need for double handling of documents and data, so streamlining processes. Home Hunt providers will transfer data to the council, allowing it to monitor allocations.
  - Other providers will receive nominations from the council directly and “manually” whenever they have a vacant property and will report back to the council to enable monitoring.
  - Providers must let to people on the housing register with the appropriate banding/bedroom need at agreed rates which range between 60% and 100% of all

lettings. Somewhat lower rates are agreed for specific lists of properties identified as hard to let. These will be reviewed on a six monthly basis.

- The council is procuring a new IT system to support its more limited role in a customer friendly way and communicate effectively with providers' systems.
16. Customers seeking housing will be able to choose to go directly to housing providers, in person or via their websites and can search and apply to more than one provider. However, if they have a recognised housing need, they will be advised as currently to apply to be on the housing register, which typically will increase their chance of receiving housing. The council and all providers will ensure that:
- all websites and advertising are clear and consistent in giving customers a picture of the whole system and their different options
  - a "no wrong door" approach will be applied

Detailed work to deliver this is now underway across all organisations, including communications professionals. This approach acknowledges that the customer journey is new and has some complexity and seeks to explain options and processes as simply, clearly and consistently as possible. However, it is also recognised that the current customer journey with Home Point is complex and has attracted criticism from public and providers alike.

17. A project management process is in place to support the allocations redesign and the delivery of the new arrangements to the public by October 2018. This includes detailed partnership meetings, a virtual project board at executive/director level, timelines and milestones and risk management. The delivery of the redesign incorporates new nominations agreements with providers, procurement of a new IT system to support the council's altered role and automatic data transfer to providers' systems. The timetable for the redesign project includes;

|              |   |
|--------------|---|
| April 2018   | Secure agreement to information sharing arrangements              |
| May 2018     | Approval of individual nomination agreements for signing          |
| March 2018   | Agree joint communications messages and communications plan       |
| June 2018    | Conclude IT procurement process and award contract to IT supplier |
| April 2018   | Detailed plan for operational changes and preparation.            |
| May 2018     | Complete activity review of Home Point and cleansing of data      |
| July 2018    | Confirm new operational arrangements to align with new IT system  |
| August 2018  | Complete joint system protocols and software for data transfer    |
| August 2018  | Completion of website and other communications changes            |
| Sept 2018    | Completion of system and operations preparation                   |
| Sept 2018    | Finalise joint communications and pre-launch publicity            |
| October 2018 | System change-over  |
| October 2018 | Official launch of new arrangements                               |

18. Information governance specialists have provided advice throughout the project and new data sharing agreements are being finalised to comply with new legislation, including

privacy impact assessments. Nomination agreements are the subject of a separate decision and with the dismantling of the Home Point Partnership will be the only formal agreement with housing providers relating to allocations. The procurement process for a new IT system to support the arrangements was launched at the end of January 2018 and will conclude in early April. This procurement is the subject of a separate decision.

19. Herefordshire was one of the original pilot areas for choice based lettings and is now one of the first areas to explore changing the arrangements significantly, although there is a growing dialogue within the sector about the effectiveness of CBL systems. Herefordshire is currently the only area to adopt this particular approach.

## **Community impact**

20. The housing allocations process is critical to the delivery of social housing to communities, which contributes to the council's corporate objective to ensure that people can live safe, healthy and active lives. Social housing contributes also to the economy of Herefordshire and ensuring that housing is fully and appropriately occupied enables housing providers to build more housing and contribute further to local infrastructure and employment.
21. The county's local needs assessment database, Understanding Herefordshire, records social housing need as reflected on the council's housing register. The register currently shows around 1,200 people requiring social housing. It also reflects housing need including homelessness and other needs associated with the quality and availability of housing provision, which illustrate the need to extend but also manage effectively local social housing resources. Allocations arrangements are central to that management.
22. The impact of the proposed changes on the council's role as corporate parent is likely to be limited. Through the accommodation strategy for vulnerable young people, the council's intention is to meet the needs of looked after children (LAC) and care leavers increasingly through targeted and supported accommodation, by-passing the social housing allocations system. However, LAC and care leavers are found on the housing register and sometimes gain accommodation through the allocations system. The proposed changes in themselves will affect little the options and experience of those user groups, although they may benefit from the increased choice and improved online presentation anticipated.
23. There are no direct implications for health and safety arising from these proposals, which do not involve significant changes to the council's direct operational or public facing services. Housing providers do not provide social housing through a conventional contractual relationship with the council and have independent responsibility as businesses and public bodies for ensuring appropriate health and safety in the provision of social housing and operation of their services.
24. The new arrangements will involve significant changes for people applying for social housing and it is very important that these are communicated effectively and in a timely way to existing tenants and the public. The council is developing a detailed communications strategy with providers, to include advance publicity so that people are aware of upcoming changes before they are implemented.

## **Equality duty**

25. Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:

A public authority must, in the exercise of its functions, have due regard to the need to -

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Further information on the subject of this report is available from  
Ewen Archibald, Tel: 01432 261970, email: Ewen.Archibald@herefordshire.gov.uk

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
26. The proposed changes to arrangements for housing allocations will have some impact on people seeking social housing. This population includes some representation of people sharing each of the protected characteristics. The changes will lead to increased opportunity or other improvements in the experience of some applicants, but for others they will not. However, there is no specific indication that the changes will affect any group with protected characteristics more than people with social housing need in general. So, overall no specific negative impact is identified for people with protected characteristics.
27. Housing providers will be aware of their potential contractual requirements with regard to equality legislation deriving from their relationship with the council. However in the allocation of social housing, providers are regarded as public bodies in their own right and so governed directly by the same duty as the council. The council and providers expect there to be some positive impact for some local people from the proposed changes, potentially from increased choice in seeking social housing and an improved online customer experience. This positive effect is expected to be experienced across the population and not directed to any particular group with protected characteristics.
28. An equality impact assessment has been prepared in relation to this decision and is attached at appendix 1.

## **Resource implications**

29. The financial implications of the proposed redesign of allocations arrangements are confined to the costs of the council's staffing and IT requirements in operating the housing register, nominations, data transfer and monitoring elements of the new system. The council holds no housing stock and bears no other financial risk relating directly to housing allocations. The operating costs of the arrangements for a full year, 2018/19 are estimated to be £151k, comprising £30.5k for IT software and support and £120.5k for staffing. These costs are within budget for 2018/19, funded from base budget and £95k from Better Care Fund (BCF) funding which has been approved to support the service in light of the loss of income from housing providers which previously contributed to costs. In the light of the BCF element of funding which is not part of base budgets, the costs of operating housing register and allocations will be reviewed each year to consider the need to reduce services or seek external sources of funding.
30. In 2016/17, housing providers gave notice of their intention to leave the Home Point partnership and cease payments towards the council's costs in operating Home Point. These notices took effect during 2017.
31. The capital costs of the purchase and development of IT software to support housing allocations is the subject of a separate decision which was approved in January 2018.
32. The procurement process has confirmed that the approved budget is sufficient to meet costs of procurement and 5 year support for the IT software.



33. There are no implications of these proposals for Transfer of Undertakings, Protection of Employment (TUPE) regulations as no services or functions are transferring. The new arrangements will not require any additional staffing for the council and the diversity of the arrangements apparently inhibit opportunities to reduce staffing. However, operational arrangements will be reviewed during 2018/19 following the implementation of changes, to consider any need to make adjustments to staffing.

## **Legal implications**

34. The council, as housing authority, is required to exercise its functions under Part 6 of the 1996 Housing Act and other associated legislation. Whilst the council does not hold its own housing stock, it must continue to fulfil its statutory duties, whilst working together with the relevant housing associations. A robust and clear working relationship between the relevant parties is required to ensure transparency and fairness to those who are owed a duty is provided, whilst ensuring the council meets its ongoing statutory duties.

## **Risk management**

35. The key risks arising from the proposed changes to housing allocations include the following and risk management will be through strategic housing and risks held on the registers for AWB directorate and the prevention division.
- Delay in implementation - this may arise from a variety of factors and the risk relates to harm to reputation and partnerships. It is mitigated by appropriate and established project management arrangements and a shared commitment to deliver with housing providers.
  - Confusion among applicants for social housing arising from the changes to the customer journey and increased choice for people. This could lead to delays and poor outcomes for prospective social housing tenants, additional workload for the council and reputational harm. This is mitigated by clear agreement on joint communications, a no wrong door approach to customers and a project plan for implementation.
  - Potential for BCF funding for this service not to continue beyond March 2019. The council will continue to work with NHS partners to assure the plan for BCF funding for 2019/20. As with all ring fenced funding which is time limited, the council will continually review the risk and revise budgets accordingly.
  - Failure of data transfer arrangements between the housing register and housing providers' public facing systems. This would affect both nominations from the register and monitoring by the council. This could lead to people with housing need not being housed, escalation of unlet properties for providers and the council not meeting its statutory duties. Mitigation is through the council's procurement of a new IT system to meet the new requirements of data transfer, detailed protocols between IT suppliers and providers and project management.
36. The risks arising should the proposals in the report not be adopted would be significant and include;
- The potential withdrawal of housing providers from Home Point arrangements leading to the collapse of the allocations process, leaving no way for the council to ensure that people with greatest housing need can receive social housing. This would lead in turn

to rapid increases in homelessness, poor outcomes for many people and reputational and regulatory risks for the council.

- The need to suspend or cancel the procurement of IT software and support leaving the council with a system not fit for any future arrangement of housing allocations and so further delaying and complicating any agreed proposals.
- Significant tension and deterioration in the relationships between the council and local housing providers.

## **Consultees**

37. The changes proposed arise from in depth consultation, engagement and negotiation with nine independent social housing providers. Those providers initiated and have shaped substantially all aspects of the proposals now made.
38. A public consultation over the proposed changes to allocations arrangements encompassing existing register applicants and tenants was held over eight weeks between January and March 2017. There were around 180 fully completed responses. The majority of respondents welcomed the proposed changes with 67% indicating that they would opt to apply through the register and directly with housing providers. Others were apparently content to apply only through the housing register or go directly to providers. Very few respondents were critical of the proposals, with many citing choice and flexibility as the main benefits anticipated. This consultation reaffirmed main aspects of the proposals and encouraged the providers and the council in working together to resolve the detail of the planned changes. There were no amendments or changes of emphasis within the proposals which were specifically influenced by the consultation. The main features of the proposals remain as they were at the time of this public consultation.
39. It has been determined that the Adults and Wellbeing Scrutiny Committee will review the progress and impact of the new allocations arrangements early in 2019.
40. Consultation has taken place with the council's political groups regarding the decision. No comments or objections were received.

## **Appendices**

Appendix 1 Equality Impact Assessment

Appendix 2 Customer journey diagram

## **Background papers**

None

# Equality Analysis (EIA) Form

## A) Description

**Name of service, function, policy (or other) being assessed**

Redesign of the allocation arrangements for Herefordshire

**Directorate or organisation responsible (and service, if it is a policy)**

AWB Strategic Housing

**Date of assessment**

February 2018

**Names and job titles of people carrying out the assessment**

Trea Connon, Strategic Housing Officer

**Accountable person**

Martin Samuels, Director of Adult and Wellbeing

**What are the aims or main purpose of the service, function or policy? What does it provide and how does it provide it?**

The allocation of social housing is one of the core functions of the council in its role as strategic housing authority. It encompasses the development and implementation of an allocation policy and the nomination of applicants to registered providers in accordance with that policy. It requires the monitoring of the outcome of the policy to ensure that the scheme is meeting the needs of those identified in the policy as being most in need of housing and that they are being successful in obtaining social housing. In particular the council must be satisfied that those in the reasonable preference categories are receiving a 'head start' for social housing.

The dissolution of the Home Point partnership represents a challenge to the council and registered providers to develop a coherent and practical pathway to enable those with a housing need to access social housing. The result of the negotiations is a commitment to a 'no wrong door' approach so that prospective applicants receive appropriate advice, information and support at first contact and thereafter.

The council will retain and maintain the housing register, assessing need and placing applicants in the relevant band. This information will be shared with providers either through data transfer arrangements or the traditional nomination process. Data transfer will enable applicants to bid for properties advertised by the major providers through their websites and/or the Home Hunt IT system in a similar manner to that experienced by applicants currently through the Home Point website.

The aim of the new arrangements are to:

- ensure that the housing register and nomination process is understandable and transparent to applicants
- meet the legal requirements for the allocation of social housing
- provide some choice of affordable rental homes to meet applicants needs
- ensure consistency in the way in which applicants access affordable and social rented housing through the council's housing register
- ensure and promote equality of opportunity in accessing the council's housing

- register
- support better use of existing housing stock within the county
- help to prevent homelessness and minimise the use of temporary accommodation
- contribute to the development of sustainable communities

**Location or any other relevant information**

**List any key policies or procedures to be reviewed as part of this assessment.**

The guidance and working procedures for the housing register and allocations will need to be reviewed following approval of the policy and prior to implementation.

The process will be reviewed after 12 months of operation as part of the policy review to ensure that it is meeting the stated objectives.

**Who is intended to benefit from the service, function or policy?**

Local resident households or those with a strong local connection and in recognised housing need.

Applicants in housing need will be given the opportunity to access social housing through the nomination/data transfer process for vacant properties owned or managed by registered providers. The definition of housing need within the allocation policy has been increased to reflect adequately the reasonable preference categories.

Those looking for affordable housing who do not qualify for the council's housing register will be able to apply directly to the housing associations for the proportion of their stock that is not subject to the nomination agreements. Applicants who would qualify for the council's register can choose to go directly to the housing associations for this percentage of the stock using both pathways to increase their chances of being housed.

**Who are the stakeholders? What is their interest?**

Potential social housing tenants and some existing social housing tenants. Their interest relates to access to the register and ability to bid for available social housing properties.

Registered Providers (aka Housing Associations) who own and manage the social housing stock in Herefordshire. The Providers are required to cooperate to such an extent as is reasonable in offering accommodation to people with priority under the housing authority's allocation scheme.

Providers need to let their social housing stock efficiently and generally to those in housing need.

## B) Partnerships and Procurement

If you contract out services or work in partnership with other organisations, Herefordshire Council remains responsible for ensuring that the quality of provision/delivery meets the requirements of the Equality Act 2010, i.e.

- Eliminates unlawful discrimination, harassment and victimisation
- Advances equality of opportunity between different groups
- Fosters good relations between different groups

**What information do you give to the partner/contractor in order to ensure that they meet the requirements of the Act? What information do you monitor from the partner/contractor in order to ensure that they meet the requirements of the Act?**

Herefordshire Council expects all partners to ensure that they comply with the Equality Act 2010 and have their own Equality policies available.

The housing register team will monitor various aspects of the scheme including applicants to the register, exclusions and those who successfully bid for social housing.

**Are there any concerns at this stage that indicate the possibility of inequalities/negative impacts? For example: complaints, comments, research, and outcomes of a scrutiny review. Please describe:**

There is some concern that the procedure arising from the dissolution of the Home Point partnership and the potential complexity for new applicants may have a negative impact. The current system is already fairly complex and it is not clear that applicants understand it fully.

The dissolution of the one stop shop Home Point choice based lettings (CBL) partnership represents a challenge for the council and housing providers, requiring the development of a coherent and practical customer journey for prospective applicants. The result of the negotiations with providers is a commitment to a 'no wrong door' approach so that prospective applicants receive appropriate and shared advice, information on all the options and support at first contact and thereafter. This should ensure that groups who may be adversely affected by the change from a single application to the potential for multiple applications understand what they need to do to meet their needs most appropriately. It should be noted that the majority of respondents to consultation in 2017 did not indicate a concern about the complexity of the arrangements or the need for support to access the options that would become available to them. This was irrespective of any protected characteristics which were identified by the respondent.

Nevertheless, earlier research on CBL systems suggests that there may be an impact on:

- Very elderly or infirm
- People with learning difficulties
- People with limited literacy
- People with mental health issues.

Application to the register and the letting of properties will largely remain an online process. Generally older and disabled people may be less likely to have IT access in the home, and, in some cases, may have greater difficulty visiting public offices where IT facilities are available. Herefordshire is predominantly a rural county with 95 per cent of the land area classified as 'rural', and 53 per cent of the population live in these rural areas. This can make accessing services more difficult.

It would seem likely that those on lower incomes, in rural areas and with limited access to the internet may be adversely affected whereas the more computer literate with easy access to the internet via multiple devices will benefit from the changes to the system.

## C) Information

**What information (monitoring or consultation data) have you got and what is it telling you?**

The monitoring information that we currently have is limited.

We are able to monitor for age, so that it is possible to state that there are 191 applications from people aged 65 or over out of a register currently standing at 1228.

776 applications are headed by a female and there are 1082 white British applicants.

However, other data, particularly in relation to the characteristics of successful applicants, has proven difficult to obtain. Although there are indications that the council is meeting most

of its statutory duties, improvement in data collection and analysis is required to ensure that this is the case.

Of the 175 responses to the consultation in 2017 on the proposal to move away from the Home Point service, 117 indicated they would use both options to obtain social housing (apply to the council and directly to registered providers). This pattern is replicated through the age groups, including those over 65 where 7 of the 11 respondents indicated they would use both options to apply for social housing.

60 of the respondents were then on the Home Point register, 62 were living in social housing and 8 were from people who had not qualified for the register. These groups also indicated that they would generally use both options, including the 8 who had not qualified at the time.

## D) Assessment/Analysis

**Describe your key findings (eg. negative, positive or neutral impacts - actual or potential). Also your assessment of risk.**

| Strand/community                          | Impact  |
|---|---|
| Race                                      | The arrangements are considered likely to have a neutral impact although there may be barriers, which may have a racial or nationality dimension, relating to recent immigrants who do not speak English to a high standard.  |
| Disability                                | Information is available in different formats for those with impairments. Support will be available from a variety of providers to help applicants understand and access the various options.<br><br>Generally, older and disabled people may be less likely to have IT access in the home and in some cases may have greater difficulty in accessing public offices. |
| Age                                       | Generally, older and disabled people may be less likely to have IT access in the home and in some cases may have greater difficulty in accessing public offices.  |
| Gender                                    | The arrangements are considered likely to have a neutral impact on this group.  |
| Faith/religion                            | Further data will need to be collected to assess impact. However, the new arrangements are considered likely to have a neutral impact on this group.  |
| Marriage/civil partnership                | It is not considered that that the policy will impact negatively on this group.   |
| Gender reassignment                       | Further data will need to be collected to assess impact.  |
| Sexual orientation                        | Further data will need to be collected to assess impact.  |
| Pregnant women & women on maternity leave | Further data will need to be collected to assess impact. However, the new arrangements are considered likely to have a neutral impact on this group.  |

## E) Consultation

**Did you carry out any consultation?**

**Yes**

**Who was consulted?**

Registered provider partners and through public consultation via the Herefordshire Council website.

**Describe other research, studies or information used to assist with the assessment and your key findings.**

**Do you use diversity monitoring categories?** Some currently. More will be monitored with the introduction of the new policy  
*(if No you should use this as an action as we are required by law to monitor diversity categories)*

**If yes, which categories?**

- Age
- Disability
- Gender Reassignment
- Marriage & Civil Partnership
- Pregnancy & Maternity
- Race
- Religion & Belief
- Sex
- Sexual Orientation

**What do you do with the diversity monitoring data you gather? Is this information published? And if so, where?**

Currently not collecting diversity monitoring data. This will form part of the monitoring process following introduction of the new policy and the future arrangements for allocations.

## F) Conclusions

|    | <b>Action/objective/target OR justification</b>  | <b>Resources required</b>         | <b>Timescale</b> | <b>I/R/S/J</b> |
|----|--|-----------------------------------|------------------|----------------|
| a) | Establish effective diversity monitoring indicators and protocols                                  | Staff time, internal and partners | August 2018      | S              |
| b) | Ensure that continued support is available for groups most likely to be impacted by the use of IT. | Staff time                        | August 2018      | S              |
| c) | Review the effectiveness of the current provision of translation services through the IT system    | Staff time                        | August 2018      | S              |
| d) |  |                                   |                  |                |

**(I)** Taking immediate effect.

**(R)** Recommended to Council/Directors through a Committee or other Report\*.

**(S)** Added to the Service Plan.

**(J)** To be brought to the attention of the Equality Manager.

\*Summarise your findings in the report. Make the full assessment available for further information.

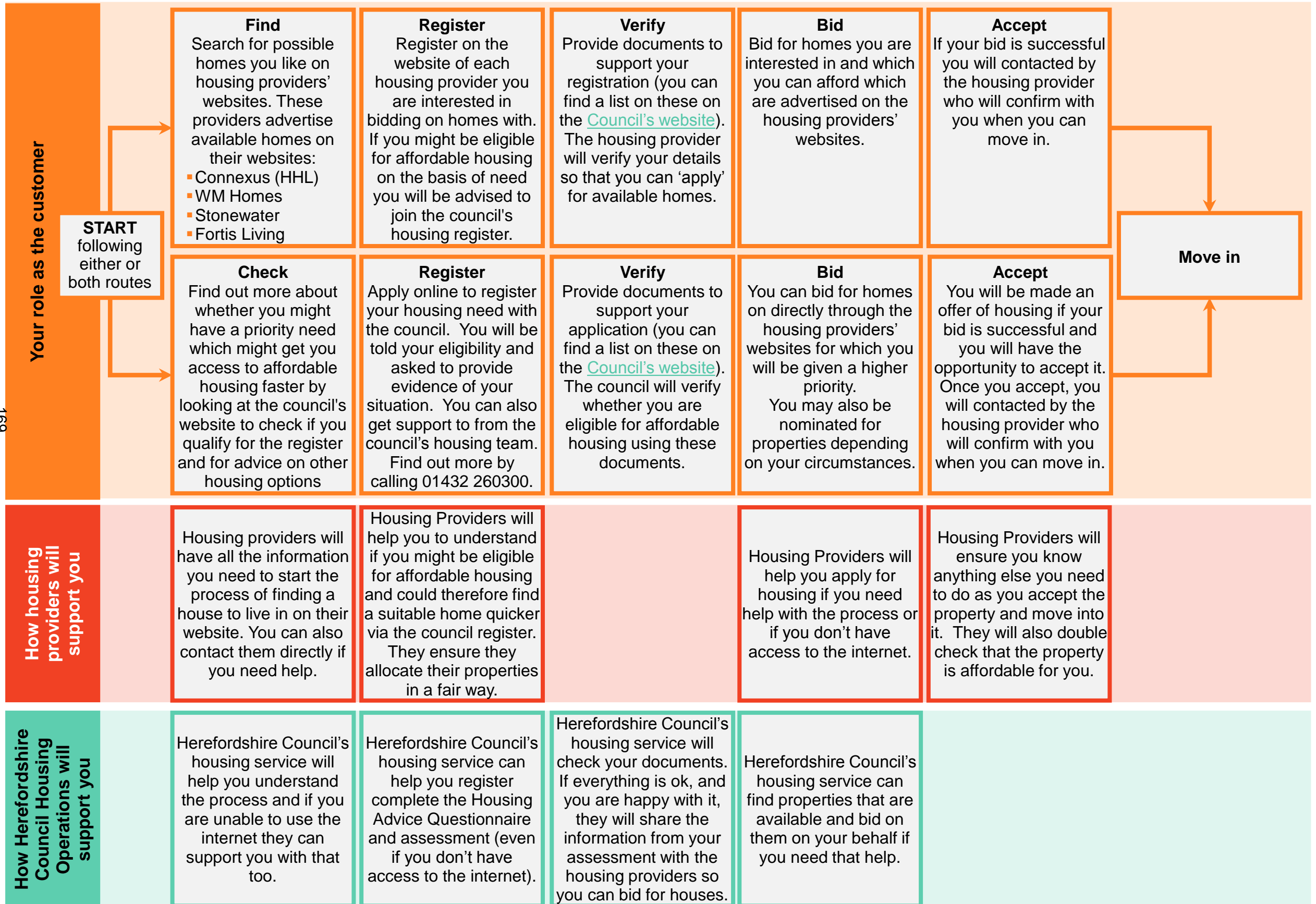
NB: Make sure your final document is suitable for publishing in the public domain.





# New Arrangements for Housing Allocation: Customer Journey

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|                         |   |
|-------------------------|---|
| <b>Decision maker:</b>  | <b>Cabinet</b>  |
| <b>Decision date:</b>   | <b>Thursday 12 April 2018</b>                                 |
| <b>Title of report:</b> | <b>Revision of the Allocations Policy for Herefordshire</b>   |
| <b>Report by:</b>       | <b>Cabinet member finance, housing and corporate services</b> |

## Classification

Open

## Decision type

Key

This is a key decision because it is likely to be significant having regard to: the strategic nature of the decision; and / or whether the outcome will have an impact, for better or worse, on the amenity of the community or quality of service provided by the authority to a significant number of people living or working in the locality (two or more wards) affected.

Notice has been served in accordance with Part 3, Section 9 (Publicity in Connection with Key Decisions) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

## Wards affected

All Wards

## Purpose and summary

To approve the revised Allocations Policy for Herefordshire.

The allocations policy for Herefordshire has been revised, in the light of the redesign of arrangements for allocation of social housing and the implementation of the Homelessness Reduction Act 2017 (HRA). The allocations process which appears elsewhere on the cabinet agenda today, determines which people in housing need should receive the social housing available locally. It is a key function within the council's role as strategic housing authority, bringing with it various statutory duties.

Under part 6 of the Housing Act 1996 (as amended) the council is obliged to operate an allocations policy, although it does not hold any stock, and to revise it from time to time. The

policy has two main functions; to indicate how national and local policy priorities will be met and to describe the practicalities of how housing allocations are organised locally.

The impact of the policy adopted in 2014 on housing register numbers and housing providers' ability to let their properties, led to a revised policy in 2016. This was intended to re-balance numbers and needs and ensure full statutory compliance. The 2016 policy has not been implemented because providers announced their intention to change the housing allocations arrangements. Those new arrangements have now been negotiated and agreed between the council and providers, for implementation by October 2018.

The allocations policy has been revised accordingly with a focus on the practical process, although some policy positions are also refined from 2016, along with requirements under the HRA. The new policy will be integral to implementing redesigned arrangements, along with new nominations agreements with providers and a recommissioned IT system, which are the subject of separate governance decisions.

## **Recommendation(s)**

**That:**

- (a) the Allocations Policy for Herefordshire at appendix 1 be approved for implementation by October 2018.**

## **Alternative options**

1. Not to revise the allocations policy, but implement the 2016 policy without amendment. This option is not recommended as it would not reflect agreed changes to operational arrangements for housing allocations and therefore would not comply with statutory requirements, generally or specifically, with regard to the new Homelessness Reduction Act 2017 (HRA).
2. Not to revise the allocations policy and continue to operate the 2014 policy. This option is not recommended as it would not allow the council to comply with allocations law, nor the HRA. Neither would it address some unmet housing need and increasing incidence of hard to let properties, which have arisen from the 2014 policy.

## **Key considerations**

3. The allocations policy for Herefordshire is one of a suite of statutory housing documents which the council, as strategic housing authority, is obliged to publish and revise from time to time. The policy sets out how social housing is to be allocated to local people in relation to housing need. Its shape and content is the subject of extensive statutory guidance which, along with its combined purpose, tends to make the policy a fairly complex document. The allocations policy sets out how national policy priorities are to be addressed locally, including provision for local connection and the five "reasonable preference" categories. It also identifies any supplementary local priorities and how they will be implemented, so as not to dilute or undermine the reasonable preference categories. Finally, the policy expresses in some detail the practical arrangements for managing social housing allocations in Herefordshire.
4. Social housing need is reflected primarily through numbers on the housing register and these currently total around 1,200 in Herefordshire. There is a complex inter-relationship

between housing register numbers and the allocations policy itself. The register does not currently encompass all groups of people with significant housing need, including those living in concealed families and also needs to be reviewed and updated to ensure that all those registered are actively seeking housing. The housing register is focused on general needs housing and so does not include particular groups of vulnerable people needing supported housing.

5. Likelihood of gaining social housing under the allocations policy arises in part from a combination of:
  - Alignment of housing needs with reasonable preference categories or local priorities
  - Local connection
  - Time, which is linked to urgency of housing need and time spent on the housing register.
6. The scope of allocations policies has diversified and become more precisely specified since the late 1990s, as statutory guidance has increased. Currently, the policy must focus on the five reasonable preference categories or national priorities:
  - Addressing homelessness, as defined under Part 7 of the Housing Act 1996
  - Addressing homelessness where a duty is owed to a household under other specific sections of the Housing Act 1996 or the Housing Act 1985
  - People living in overcrowded, insanitary or otherwise unsatisfactory housing conditions
  - People who need to move for specific medical or welfare reasons, including additional consideration for people fleeing domestic abuse.
  - People needing to live in a particular locality in order to take up employment, education, health or other services in order to avoid hardship.
7. The policy also identifies a number of local priorities which must not dilute the focus on reasonable preference categories:
  - Supporting sustainable communities in rural locations by the provision of housing for local residents through Section 106 agreements
  - Vacating housing where adaptations or facilities are not needed or utilised
  - Affordability for people with low incomes
  - Safeguarding.
8. The diverse scope of the allocations policy means that it will require revision if there are significant changes in national policy, local priorities or operational arrangements for allocations. In 2013, the council adopted a new policy designed to remove from the housing register significant numbers of people with low priority banding and little prospect of gaining a social housing tenancy. Its implementation in 2014 led to an unanticipated significant fall in numbers from over 5,000 to around 560. Although there has since been an incremental increase in numbers registered, there remains a concern that groups of people with tangible housing need are excluded from social housing and cannot be identified. The impact of the 2014 policy attracted considerable challenge from housing developers and providers for different reasons, but the growing incidence of hard to let properties was a particular concern.
9. In 2016, Cabinet approved a revised policy to address wide ranging concerns, re-balance numbers in relation to housing need and ensure statutory compliance. The revised policy was due for implementation in October 2016, but this did not progress once housing providers announced their intention to change operational arrangements for allocating social housing. This involved moving away from the current Home Point lettings system

and any single integrated allocations arrangement and so would require yet further major revision of the policy. The negotiations between the council and providers over future operational arrangements proved to be very protracted and only reached a consensus about the proposed redesign in November 2017. The allocations policy has now been revised again to reflect the new operational arrangements to take effect by October 2018.

10. The redesigned operating arrangements for allocations are subject to a separate decision for Cabinet. They do not involve a single integrated process and the council will no longer manage most of the arrangements. The council's role will be focused upon managing and maintaining the housing register, nominations to providers in different forms and monitoring allocations arrangements overall. Providers will advertise their own properties independently and manage the bidding and lettings process. For the great majority of housing stock, the data from the register and all its applicants will be transferred automatically to a website shared by three providers. This will enable housing register applicants to bid directly for properties alongside the wider public. Other providers will take manual nominations from the council when properties are available.
11. There will be nominations agreements with each provider detailing the proportion of properties which may need to be let to people on the housing register. The council is procuring a new IT system to support the new arrangements, into which the revised allocations policy will be embedded. A procurement process was approved by cabinet member in January 2018.
12. The revisions made in the proposed policy reflect the approach of the policy approved in 2016, but not implemented. All the policy changes adopted then will remain, with limited amendments. There are also some new policy changes, along with amendments to reflect statutory requirements under the Homelessness Reduction Act 2017. The main policy changes include;  
A move away from prioritising threat of homelessness and a return to the focus on people who are actually homeless and the statutorily defined homelessness criteria
  - A relaxation of limitations on capital assets for older people seeking sheltered housing
  - Detailed changes around overcrowding and sharing of accommodation to increase the number of people in concealed families with priority need on the register.
  - A tightening of local connection requirements to align with national policy, including a two year residential requirement
  - Introduction of an exclusion from the housing register for unacceptable behaviour and/or housing debt to promote alignment with provider's own exclusion policies
  - Extension of waiver of local connection for military personnel to ex-partners and ex-spouses
  - Broader application of reasonable preference categories to disabled people and those with mental health needs
  - More detailed banding criteria to reflect up to date statutory requirements around reasonable preferences and homelessness
  - Additional responses to further protect people fleeing from domestic abuse.
13. The benefits of the proposed changes to the policy include greater and more transparent fairness and a broader focus on the diversity of local people seeking social housing and their needs. There is also an expectation that the changes will ensure that Herefordshire's allocations practice is fully compliant with national policy and statutory guidance and that risk of legal challenge around the policy is substantially reduced. Wider implications of the policy include the interdependency with the HRA and its implementation. These are

difficult to predict and it will be important to review the impact of the HRA on a six monthly basis against benchmark expectations set by implementation in Wales and English pilot areas.

14. The HRA changes and those made in 2016 to focus more directly on actual homelessness, may lead to some increased demand for temporary accommodation and this will be reviewed closely during 2018/19. Current usage of temporary accommodation is relatively low and well controlled but opportunities for expansion are under review with providers.
15. The policy revisions include the introduction of an exclusion from the housing register for up to 12 months. This is a move to addressing an established tension between allocations policies and housing providers' own policies, which are used to manage risk to tenancies and income. Some of these policies enforce exclusions for periods of five years. The council has a responsibility to ensure alignment between the allocations policy and exclusions policies but can have no direct control over what providers do in this area. The council has been working to persuade providers to invest greater flexibility and discretion into their policies to ensure fairness and consistency. There remains a minority of providers with significant stockholdings whose exclusions are not at all aligned to the council's policy. The council is committed to continuing to work with providers to improve that alignment and so reduce the risk of legal challenge.
16. One of the challenges experienced in the current housing allocation system is the limited business intelligence that it generates for both the council and providers. The new arrangements and the re-procured IT system will provide sufficient data to monitor effectively both the housing need expressed through applications to the housing register and the capability of the policy and process to address those needs. The arrangements are designed to ensure that outcomes are measured and effectiveness analysed.

## **Community impact**

17. Fair and appropriate access to social housing is central to the council's commitment to enabling residents to lead safe, healthy and independent lives as in the corporate plan. As well as being essential for local people in building their lives, social housing contributes to the local economy. The new policy will give greater priority to people with a longer term local connection to Herefordshire. Fair access to social housing also contributes to the achievement of key objectives in the health and wellbeing strategy.
18. Understanding Herefordshire, the county's joint strategic needs assessment, identifies need for social housing and records the numbers on the housing register, currently around 1,200 people. It also identifies the significant numbers of local people living in poor quality or unsafe accommodation, predominantly in owner occupied and private rented housing and increased numbers of concealed households. These are households in which multiple or extended families are living in potentially overcrowded circumstances. Increased and fairer access to social housing will reduce the impact of poor quality housing for local people.
19. The impact of the new policy on the council's role as corporate parent is likely to be limited. Through the accommodation strategy for vulnerable young people, the council's intention is to meet the needs of looked after children (LAC) and care leavers increasingly through targeted and supported accommodation, by-passing the social housing allocations system. In tandem with the accommodation strategy for vulnerable young people it is expected that care leavers and LAC will not need to rely on the homelessness

route for accessing social housing. It remains possible for care leavers and looked after children to apply to the housing register.

20. There are no particular implications for health and safety arising from the revised policy. The council holds no housing stock and housing providers have comprehensive policies, standards and procedures in relation to health and safety of their stock. Housing standards are governed by the Housing Health and Safety Rating System (HHSRS) introduced in 2004. The council has a duty to deal with hazards identified under HHSRS. This role is undertaken by the council's housing enforcement team. There are no changes to staffing or operating arrangements for council staff arising from the policy revision.

## Equality duty

21. Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:

A public authority must, in the exercise of its functions, have due regard to the need to -

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
22. There are various specific and detailed policy changes adopted as part of the revised allocations policy and generally these will have no particular impact on groups of people with protected characteristics. However, there are minor changes which will benefit disabled people, including ensuring that housing with major adaptations, which is not used by the present occupants, is made available to disabled people. It will also be easier for disabled people requiring to move to be able to receive care or support more effectively to gain a priority banding on the register.
  23. No negative impact of the revised policy has been identified for any groups of people with protected characteristics. However, as the council does not have its own stock, specific decisions about offering tenancies to people are made by housing providers and whilst they are bound in principle by the allocations policy, they also apply their own exclusions policies. These may conflict with the allocations policy so that someone with a high priority on the housing register may be excluded from tenancies for up to five years owing to issues relating to debt, anti-social behaviour or offending. This may affect disabled people, including those with mental health needs, or other groups of people with protected characteristics.
  24. The council is committed to working with housing providers to ensure optimum alignment between the allocations policy and providers' own policies. In relation to allocation of social housing, independent providers are likely to be regarded as public bodies for the purposes of the Equality Act 2010, with the same duties and obligations as the council. An equality impact assessment has been prepared in relation to this decision and is included at appendix 2.



## Resource implications

25. There are no specific implications for resources arising from the proposed new allocations policy. The policy helps shape how the resources of housing providers are utilised but the council has no direct control over those resources. The new policy has no direct impact on the council's staffing, which supports the allocation process. Proposed changes to the arrangements for allocating housing under the policy are the subject of a separate report, which examines the implications for resources of those changes.

## Legal implications

26. Housing authorities are required by section 166A(1) to have an allocation scheme for determining priorities and for defining procedures to be followed in allocating housing accommodation and they must allocate in accordance with the scheme. This duty applies whether or not the council holds any housing stock. All aspects of the allocation process must be covered in the scheme. Whilst the council, as the housing authority does not have its own housing stock, it must continue to have its own allocation scheme.
27. If, as part of any proposed changes to its allocation scheme, a major change of policy is proposed, the council is required to send a copy of the draft scheme, or proposed alteration, to every private registered provider of social housing and registered social landlords with whom the council holds a nomination arrangement with and afford them a reasonable opportunity to comment on the proposals.
28. Section 166A(3) of the Act imposes a mandatory requirement on councils in forming the allocation scheme to ensure that reasonable preference is given to the following categories of people:
  - a. People who are homeless
  - b. People who are owed a re-housing duty by the council
  - c. People occupying insanitary or overcrowded housing or otherwise living in unsatisfactorily housing conditions
  - d. People who need to move on medical or welfare grounds, including grounds relating to disability
  - e. People who need to move to a particular locality in the district of the council, where failure to meet that need would cause hardship.

## Risk management

29. The key risks arising from the proposed changes to the allocations policy are to be managed by the council's strategic housing service and entered on the risk register for the adults and wellbeing prevention division. The risks include:
  - Specific policy changes within the allocations policy may have the effect of increasing numbers on the register overall without any corresponding immediate increase in social housing availability, extending any effect of demand exceeding supply. The risk is not high and is likely to be mitigated by the current availability of properties which providers find difficult to let. The proposed changes to allocations arrangements, providing multiple routes for people to seek social housing, may also assist in this respect.
  - Potential conflict between the exclusion of some applicants from the housing register for up to one year and some providers' policies which may exclude people for much

longer periods. Whilst not arising directly from the new policy, this potential conflict could lead to legal challenge to the council and providers alike. The council seeks to mitigate this risk by working with providers to introduce more flexibility and discretion into some policy positions and so optimise alignment with the allocations policy.

- Possible increase in demand for temporary accommodation. This would not arise directly from the new policy but potentially from the implementation of the HRA or implementation of changes adopted in the allocations policy approved in 2016, but not so far implemented. In order to mitigate this risk, the council is reviewing current provision for temporary accommodation with its providers, with a view to increasing supply incrementally to meet any rising demand.

30. The risks arising from the recommendations in this report not being approved, include:

- Once the proposed new allocations arrangements are implemented, the allocations policy would reflect the operational arrangements for allocating social housing locally. The council would therefore be in breach of its statutory duties concerning allocations policies under Part 6 of the Housing Act 1996 and there would be potential for confusion among providers and applicants to the housing register.
- The allocations policy would reflect policy changes since the 2016 policy was adopted. This may lead to the policy being non-compliant with current statutory guidance relating to local connection, victims fleeing domestic abuse and other key issues. This could lead to poor outcomes for some families and regulatory or reputational risk to the council.

## Consultees

31. Consultation has taken place with all regular stockholding providers of social housing in Herefordshire. They have been able to review the draft policy and several meetings have been held where the potential content of the revised policy was discussed. Providers have not proposed any major changes to the proposed policy, but have offered advice on a number of specific and detailed aspects of policy and procedural content. This advice has been responded to in each case and, where appropriate, has been incorporated into the policy.
32. The adults and wellbeing scrutiny committee has determined that the proposed changes to allocations arrangements will be reviewed early in 2019 and it is likely that the committee would also review the new revised allocations policy at that time.
33. Political groups have been consulted in relation to this proposed decision. No comments or suggestions were received.

## Appendices

Appendix 1 Draft allocations policy for Herefordshire 2018

Appendix 2 Equality impact assessment

## Background papers

None

**DRAFT**

**HOUSING ALLOCATION  
POLICY FOR  
HEREFORDSHIRE**

March 2018

**VERSION CONTROL  
SUMMARY OF CHANGES MADE TO ORIGINAL DOCUMENT**

| Version | Paragraph No.s | Summary of changes | Date       |
|---------|----------------|--------------------|------------|
| 1       |                | Original document  | March 2018 |
|         |                |                    |            |
|         |                |                    |            |

DRAFT

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## 1. INTRODUCTION

1.1 The Housing Act 1996 requires every local authority to develop and publish an allocations policy for determining the priorities and detailing the procedures to be followed in allocating housing. Recent legislation has allowed local authorities more freedom to determine policies that best meet local circumstances and priorities, within the constraints set out in the Housing Act 1996, as amended (“the 1996 Act”). This is Herefordshire Council’s Housing Allocation Policy.

1.2 Herefordshire Council does not own any housing stock. It works in partnership with housing associations operating in the county to address housing need through the allocation of social housing.

1.3 This policy clarifies the roles and responsibilities of the local authority and the housing associations, and the legal responsibilities of each for delivering the local authority’s statutory responsibilities in relation to the allocation of housing. It details the arrangements for applying to register for social and affordable rented housing (hereafter referred to as ‘social housing’), and the process by which the majority of it is let in Herefordshire.

1.4 Although the Council’s Housing Register team administers the housing register, final allocation decisions are made by the housing association which owns or manages the individual property.

1.5 The housing associations let a proportion of their stock to direct applicants. The individual housing association’s lettings and exclusion policies can be viewed using the web address in this Appendix or by clicking [here](#) which will take you to the Housing Register web pages which have links to the housing associations sites.

1.6 Herefordshire Council has nomination agreements with the housing associations in the county. These agreements specify the percentage of vacant properties that will be offered to applicants on the council’s register. The percentages vary from 60% to 75%, depending on the association, the property location and type.

1.7 The 1996 Housing Act (as amended) requires local authorities to make all nominations in accordance with their allocation policy. This policy will be used to make nominations to housing association with stock in the county.

1.8 In developing this policy Herefordshire Council has had due regard for legislation, government guidance and responses from consultation.

1.9 This policy sets out:

- The aims of the policy;
- Who can register;
- How an applicant's housing needs are assessed;
- How the housing register operates;
- How social rented homes across the county are let.

**Acceptance on to the register is not an immediate housing solution and does not guarantee that an offer of accommodation will be made.**

## 2. AIMS

2.1 The key aims of this policy are to:

- ensure consistency in the way in which applicants access affordable and social rented housing through the council's housing register
- ensure and promote equality of opportunity in accessing the council's housing register
- ensure that the housing register and nomination process is understandable and transparent to applicants
- meet the legal requirements for the allocation of social housing
- provide some choice of affordable rental homes to meet applicants needs
- support better use of existing housing stock within the county
- help to prevent homelessness and minimise the use of temporary accommodation
- contribute to the development of sustainable communities

2.2 We will deliver these aims by:

- Operating a housing allocation policy where applicants are placed in bands according to their level of need;
- Providing support and advice for customers when they need it;
- Providing applicants with straightforward and realistic information on supply and demand and the prospect of re-housing both within the social sector and private rented accommodation;
- Ensuring that every application for the housing register is dealt with fairly and consistently, so promoting equality of opportunity;
- Supporting and encouraging applications from all applicants who may qualify for the register;
- Facilitating mobility to meet household needs.



### 3. SCOPE

This policy applies to new applicants that the council nominates an applicant to be an assured, assured shorthold, or starter tenant of housing owned or managed by a private registered provider (referred to as housing associations in the remainder of this document).

This includes properties let at an affordable rent and on fixed term tenancies, as well as social rented properties and periodic tenancies.

The policy generally does not apply to an existing tenant of a housing association unless the person has applied to Herefordshire Council and the council is satisfied that the person qualifies under the reasonable preference categories of s.166A (3) of the Housing Act 1996, as amended.

To meet the strategic aim of supporting better use of the existing stock the council does allow existing tenants to qualify for the register through the under-occupation criterion in Band C or where a household no longer requires major adaptations criterion (Band A).

#### **Exempt Allocations**

The following are not subject to the banding scheme or the nomination agreements:

- Succession to a tenancy under s.17 of the Housing Act 1988;
- A mutual exchange with another tenant;
- Assignment of a tenancy;
- Transfer of a tenancy in accordance with a court order under Family Law provisions or under the Civil Partnership Act 2004;
- A starter tenant becoming an assured tenant;
- Any provision of temporary accommodation.

### 4. LEGAL FRAMEWORK

The primary legislation governing the allocation of social housing is the Housing Act 1996, (as amended), and the associated statutory codes of guidance and statutory instruments.

This legislative framework applies to Herefordshire Council directly and requires housing associations to 'cooperate to such an extent as is reasonable in the circumstances in offering accommodation to people with priority under the authority's scheme'.

Any housing association with stock in Herefordshire is subject to nomination agreements with the council. These detail the percentages of their stock for which the council has the right to nominate applicants from the housing register for the allocation of accommodation. Nominations from the council to the housing association are assessed in accordance with this policy. Associations have their own lettings and exclusion policies and will review the nominations against these before making an offer of accommodation. Applicants therefore should read the

policies which can be viewed by using the links on the housing register page of the council's website or by clicking here. The council and the housing associations are working to establish as close alignment between policies as possible.

When an allocation by a housing association follows the council's allocation policy it will meet the requirements of the nomination agreement.

The legislative framework restricts eligibility for social housing and enables local authorities to define those who qualify to be allocated housing in their areas. It allows financial resources, behaviour and local connection to be taken into account when defining qualification rules. Herefordshire Council has chosen to make use of these flexibilities in this Allocation policy.

The Allocation policy has been developed to be compatible with other relevant legislation and guidance including, but not restricted to:

- The Human Rights Act 1998
- The Data Protection Act 2018The Freedom of Information Act 2000
- Children's (Leaving Care) Act 2000
- The Equality Act 2010
- Armed Forces Covenant

A summary of this policy is available here and is available free of charge to any person who asks for a copy. This document is the full version of the policy and is available on Herefordshire Council's website. If requested a hard copy can be provided on payment of a reasonable fee (to be confirmed at time of request).

#### **4.1 Equality statement**

Herefordshire Council is committed to equality and dignity for all members of the community, and supports the principles of the council's equality policy 2017-19, including promoting acceptable behaviour, making fair and equitable decisions and providing accessible services.

The allocation policy is designed to ensure that it is compatible with the council's equality duties including the duty to eliminate unlawful discrimination and to promote good relations between persons who share a relevant protected characteristic and those who do not. The protected characteristics are age, race, disability, sex, pregnancy and maternity, sexual orientation, religion or belief and gender reassignment.

The policy ensures that each applicant is assessed on the basis of individual need. In addition, the assessment will seek to identify, and meet any special requirements, and to provide support to vulnerable applicants.

Herefordshire Council expects all housing associations to ensure that they comply with the Equality Act 2010 and have their own Equality policies available.

## 4.2 Statement on choice and constraint

Herefordshire Council is committed to enabling applicants to play an active role in choosing where, and the type of property and tenure they want to live in, whilst continuing to house those people in the greatest need. Applicants can indicate their areas of choice through the online application form or by 'bidding' on properties advertised by the housing associations.

It is important to know, however, that the demand for accommodation is higher for some types of property and in some areas than others. In making a decision about the choices available, applicants need to consider the urgency of their housing need and the availability of properties in any given area.

Whilst the policy offers applicants choice, there will be a number of instances where this may not be possible, for example:

- the applicant does not meet the criteria for the scheme or the empty property
- there is a legal agreement restricting who can be offered the property
- there is a local lettings plan in place
- the applicant has been accepted under the full homeless duty
- there are few properties of the size or type in the chosen area

Applicants should note that the decision to make an offer of a property is made by the housing association, **not** the Housing Register team.

## 4.3 Confidentiality, data protection & information sharing

All information processed by the council in respect of housing applications is done so in accordance with the provisions of the Data Protection Act 2018. Information you provide in support of the application will be shared with third parties who provide social and affordable housing.

For details about how your information will be used can be found on our website:

The existence of an application from an individual will not be disclosed to any other member of the public without the consent of the applicant.

An applicant has the right to request details of the information held about them.

## 5. ADVICE AND ASSISTANCE

The council acknowledges that this Allocation policy requires the active participation of housing applicants and to reflect this, the council aims to provide advice and assistance as required by s.166(1) and s.168(1) of the Housing Act 1996.

5.1 General information about the scheme will be made available as follows:

- information about the procedures for applying to the scheme
- information about how applicants are prioritised under this policy
- information about the nomination process
- information about the outcomes of nomination
- if they do not qualify for the council's housing register, how they may still be able to access housing associations properties

5.2 Applicants will also be provided with information regarding their own application which will include:

- what information they need to supply to complete registration and the **timescales** for providing the information
- if they do not qualify what they need to do to rectify this
- what band they have been awarded under this policy
- what size properties they are entitled to be nominated for

5.3 Applicants who have difficulty reading or understanding this policy may benefit from the following services:

- an interpretation service if their first language is not English
- signing if speech or hearing is impaired
- provision of documents in large print if an applicant is visually impaired
- an interview to explain the policy
- information about where independent advice is available

5.4 The Housing Register team can also provide information about other housing options.

This will include:

- advice on housing associations operating in the county
- advice on and signpost to available low cost home ownership options
- assistance in making an application to the housing register

The council's Housing Solutions team can provide:

- advice and help on renting in the private sector.

Advice is also available through the the Housing Advice Questionnaire, a self-help tool available [here](#).

## 6. ROLES OF OFFICERS: DECISION MAKING AND BENEFICIAL INTERESTS

### 6.1 Officer responsibilities

The Housing Register team administers the housing register, and does not make offers of housing. These are made by the housing associations.

Certain functions within the scheme can only be undertaken by a senior officer or manager and, where this is the case, it has been identified in the allocation policy.

Whilst the council aims to achieve clarity and transparency for the public, there is discretion to vary qualification, priority and property size and type rules to provide a degree of flexibility in the implementation of the policy when considering individual cases. Any use of this flexibility will be subject to determination and confirmation by Housing Solutions and Register Team Lead (HSRTL) and the reason for the decision dated and recorded on the application record. It is not intended that this delegated authority be used other than in exceptional cases. The HSRTL will take into account all relevant circumstances when making the decision.

Any officer who is related to or knows an applicant personally will not be involved in the assessment of the application or in the nomination of the applicant to a housing association. The officer will be required to notify her/his team lead or manager of the potential conflict of interest and complete a declaration of interest form.

### 6.2 Councillors, board members, employees and their close relatives

This scheme is designed to ensure that Herefordshire Council is transparent and equitable when nominating staff, Councillors or board members and their close relatives for available properties. Applicants who work for the council, a registered provider, a board member of a registered provider or is a member of the council must disclose any such relationship when applying for housing. Failure to disclose so may result in the application being cancelled.

The Allocation scheme is open to any qualifying applicant and there are stringent checks in place that all applicants must follow. Staff, Council or board members and their relatives are treated as any other applicant and must not gain or be seen to be gaining any advantage or any preferential treatment in the course of their application, nor shall they be disadvantaged.

## 7. WHO CAN APPLY?

Applicants must be eligible and must qualify to make a successful application to be accepted on to the register. The housing register team undertake the process of eligibility and qualification assessment for acceptance on to the housing register. The team also assesses and confirms the banding award for applicants to the council's housing register.

### 7.1 ELIGIBILITY

The Housing Act 1996, as amended, defines the categories of people who are **not** eligible.

### 7.2 Ineligible households

Certain people are not eligible for admission to the housing register by law.

Herefordshire Council will ensure compliance with the statutory provisions for eligibility, as amended from time to time.

It is not practical to define precisely all the circumstances in which restrictions may apply. The guidance below is an overview of eligibility at the time of approval of the policy. Anyone unsure of their status should seek detailed advice from the Housing Register team.

7.3 Applicants who are currently not eligible to go on the housing register include the following:

- a) People who are subject to immigration control; unless they have refugee status or exceptional leave to remain, or have been in the UK more than five years and their former sponsor is no longer living;
- b) The following are not eligible for inclusion on the housing register even though they are not subject to immigration control:
  - Those who are not habitually resident in the UK, Channel Islands, the Isle of Man or the Republic of Ireland;
  - Those whose only right to reside in the UK is derived from their status as a jobseeker or the family member of a jobseeker;
  - Those whose only right to reside is the initial right to reside for a period not exceeding three months under Regulation 13 of the European Economic Area regulations;
  - Those whose only right to reside is as the parent of a UK citizen child who has no other rights to reside in the UK.
- c) Any other person as prescribed by the Secretary of State.

If there is any uncertainty about an applicant's immigration status the council will contact the UK Border Agency to check the position.

Applicants who are ineligible to be accepted on to the register will be notified in writing of the decision. These applicants are also not eligible for social housing provided by the housing associations.

#### **7.4 QUALIFICATION**

All applicants eligible to join the council's housing register will be considered, provided that the application is made in accordance with this policy. Applicants must have a housing need recognised by this housing allocation policy in order to qualify for inclusion on the register.

Housing association tenants qualify for inclusion on the register if they apply to the council and are assessed as being in the reasonable preference categories. Existing tenants may also qualify for the register if they are under-occupying a family home or the property in which they live has major adaptations that the household no longer needs.

#### **7.5 Local connection**

To qualify to join the housing register applicants should have a local connection to the county, as defined by s.199 of the Housing Act 1996.

Applicants without a local connection to the county who have a housing need in one of the reasonable preference categories will be placed in the reduced preference band.

Local connection in this context means that the applicant meets at least **one** of the following criteria:

- a) Currently living in the county (in settled accommodation or accommodation of choice) for at least 2 years continuously or for 3 years out of last 5 years at the point of application;
- b) Have close relatives living in the county (parents, adult children, brothers or sisters) who have done so for at least the last 5 years at the point of application;
- c) Be employed and have worked in the county for at least 12 months and the work has been, and is, for more than 16 hours a week, or has an offer of permanent employment for more than 16 hours a week and the applicant continues to work in that job or the offer of employment remains open while the applicant is on the register;
- d) Is a Herefordshire looked after child or care leaver, or is a care leaver under the age of 21 who has lived in the county for at least two years, including some time before turning 16.

- e) Exceptional circumstances, at the discretion of the Housing Solutions and Register Team Lead (HSRTL).

For the purposes of determining qualification on residency grounds, living in the county shall not include the following:

- Occupation of a mobile home, caravan, motor caravan or houseboat where it is not their only or principal home;
- Occupation of a holiday letting for the purposes of a holiday;
- Occupation in student accommodation where it is not their principal home;
- Occupation of temporary accommodation when placed there by other local housing authorities;
- In-patient of a hospital or similar settings where the applicant has a connection elsewhere.

Under some exceptional circumstances, such as where there may be an overriding housing need to be met or a duty to a statutorily homeless person, the qualification rules may be waived.

#### **7.6 Local Connection for Armed Forces Personnel**

Local connection requirements will not apply to the following applicants:

- members of the Armed Forces and former Service personnel, where the application is made within five years of discharge;
- bereaved spouses, unmarried and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner;
- serving or former members of the Reserve Forces who need to move because of serious injury, medical condition or disability sustained as a result of their service;
- divorced or separated spouses, separated unmarried and civil partners of members of the Armed Forces who have lived in Services Family Accommodation for a minimum of two years immediately prior to the breakdown of the relationship and are required to vacate the Services Family Accommodation as a result of the relationship breakdown.

Armed Forces personnel should also refer to section 8.3 below.

#### **7.7 Right to Move**

The government introduced the Right to Move for social housing tenants in 2015. This required that a local connection may not be applied to existing social tenants seeking to transfer from another local authority district in England who:

- have reasonable preference because of a need to move to the local authority's district to avoid hardship, **and**



- need to move because the tenant works in the district, **or**
- need to move to take up an offer of work

### 7.8 Those who do not qualify

An applicant will **not** be accepted on to the council's housing register for social housing if: -

- a) i) They have sufficient financial resources to resolve their own housing need. Applicants without dependents with an annual household income of £35,000 or above or applicants with dependents with a combined annual household income of £45,000 or above will not normally qualify to join the housing register.
- ii) Those with capital or assets of £50,000 (under 50 years of age) or £100,000 (over 50) will not normally qualify to join the housing register.
- iii) When making the financial assessment, where capital/savings are available for specific reasons these may be disregarded. For example, it is normal practice to disregard any lump sum received by a member of the Armed Forces as compensation for an injury or disability sustained on active service.
- iv) Applicants over 60 years of age with capital or assets worth up to £150,000 may be accepted on to the register for sheltered housing only where they have a need for sheltered housing. Housing associations generally assess the need for sheltered housing prior to an offer being made.
- b) Anyone who has a legal or financial interest in a property that can be sold to provide sufficient funds to resolve their housing need. If an applicant has an interest in a property which cannot be sold the HSRTL will review the application and determine whether the applicant should be accepted on to the register.
- c) Anyone who has unreasonably disposed of financial resources that could have enabled them to purchase/obtain their own accommodation. See Appendix B (Band D) for further information.
- d) Applicants (or a member of their household) who have committed acts of unacceptable behaviour such that a court order has been obtained, the order has been breached at the time of their application for housing they are still considered unsuitable to be a tenant by reason of their behaviour. Unacceptable behaviour includes anti-social behaviour and housing debt. For more details see Appendix D.
- e) Anyone living in adequate accommodation who does not have a housing need identified in the housing allocation policy. Households without any other qualifying factors and who

have an adequate number of bedrooms will be treated as adequately housed and so will not qualify to join the register.

## **7.9 Young people aged 16- 18 years old**

The register is open to applicants from the age of 16 unless they are specifically ineligible or do not meet the qualification requirements.

7.9.1 It should be noted, however, that a tenancy would not usually be granted to applicants under the age of 18. Consideration may be given to applicants where an adult or organisation acts as a trustee to hold the tenancy in trust for the applicant until they reach the age of 18. There may also be a requirement to obtain a rent guarantee.

7.9.2 Therefore applicants under the age of 18 must supply contact details of the adult or organisation willing to act as trustee at the time an application is made.

7.9.3 Applicants aged over 16 may be accepted on to the register where one or more of the following apply:

- where a referral for assistance has been made by Social Services authorities under Section 27 of the Children Act 1989;
- a young person who is deemed a relevant or eligible child or a former relevant or qualifying care leaver under the Children (Leaving Care) Act 2000 as amended.

In each case, an assessment of the applicant's housing, care and support needs will be undertaken to ensure that adequate support is available to make sure that the applicant is capable of maintaining a tenancy.

## **8. ASSESSMENT OF HOUSING NEED**

In order to assess housing needs applicants must complete an online form which will be assessed by the housing register team and may lead to further enquiries where information is required from a third party to clarify the applicant's circumstances.

The council will require applicants to provide supporting documentation including photographic identification documents and may check the accuracy of some or all of the information submitted in support of the application. This is to deter and detect fraud and ensure that housing is allocated to those who are entitled to it.

It is expected that permission will be given by applicants to share or obtain information, relevant to their housing assessment. If permission is refused it is not possible to complete the assessment and will impact on qualification for the register.

All applicants and members of their households will be required to disclose any unspent criminal convictions or pending court cases in their application.

## **8.1 Banding scheme**

The Housing Register team operates the needs based banding scheme described below. The table is arranged to reflect identified housing need in descending order of priority. For the purpose of nomination for social housing under this policy, applicants in band A have the highest priority and applicants in band D have the lowest priority.

All eligible and qualifying applicants are placed in bands according to their housing application assessment. Further information about each band and the assessment of each criterion is available in Appendix B.

Applications are assessed by bedroom need and prioritised by band, and, within that band, by effective date. For details of bedroom need assessment see Appendix C.

Where an application has more than one housing need which appear in different bands it will always be placed in the higher band, unless subject to reduced preference criteria.

## **8.2 Time limited banding**

All Band A awards are subject to time-limited banding.

Applicants awarded time limited bands are given a period of time before their application is reviewed. The timescales given reflect the urgency of the situation, both for the applicant and for the council. All cases will be monitored during this period.

Towards the end of the stated period each application will be reviewed on its own merits, and a decision will be made as to whether:

- The applicant should remain in the band until a further review.
- A direct offer of accommodation should be made before reassessing the application
- The applicant needs more support to obtain the appropriate housing
- The applicant should lose their banding as the circumstances under which they were placed in band no longer apply.

During the initial period applicants will be expected to bid for any suitable properties advertised by the housing associations and/or respond quickly following nomination to specific housing associations. The Housing Register team will monitor this and if applicants do not make bids on suitable properties, the council may arrange auto bidding with the associations using Home Hunt and/or a direct offer.

In conducting the review the following will be taken into consideration, where appropriate:

- Have there been any properties advertised that would have met the applicant's need?
- If so, have they bid for them?
- Why have they been unsuccessful?
- Have they received appropriate support and help in accessing the bidding system?
- Have the applicant's circumstances remained the same?

If the applicants require help with bidding the housing register team or the housing association may be able to help.

Applicants must consider different property types from those they currently occupy. This means that applicants will sometimes need to compromise on their ideal choice of housing in order to achieve the urgent move they need. It will not always be possible to meet all aspirations.

Applicants will be advised of the outcome of the review in writing.

## **8.2 Reasonable Preference**

Herefordshire Council is required by law to determine the relative priority that housing applicants are awarded. This is particularly important when, as is the case in this county, the demand for social rented housing is often greater than the availability of homes.

The law, as it applies to local housing authorities, requires that reasonable preference for housing must be given to those in the categories set out in the Housing Act 1996 (as amended). Therefore, the allocation policy gives reasonable preference to the following categories of people (s.166A (3)):

- (a) People who are homeless within the meaning of Part 7 of the 1996 Act, as amended;
- (b) People who are owed a duty by any housing authority under section 190(2), 193(2) or 195(2) of the 1996 Act (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any housing authority under s.192(3), as amended;
- (c) People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions;
- (d) People who need to move on medical or welfare grounds, including grounds relating to a disability;
- (e) People who need to move to a particular locality in the district of the local authority, where failure to meet that need would cause hardship (to themselves or to others).

This does not mean that households who fall into the reasonable preference categories are necessarily entitled to priority over all other applicants in all circumstances.

### **8.3 Additional Preference**

8.3.1. Applicants who meet the Armed Forces definition (see Section 7.6) AND fall into any of the reasonable preference categories (see banding scheme Appendix B) will be awarded additional preference by means of backdating the effective date by six calendar months. For example, a qualifying applicant awarded priority within one of the reasonable preference categories on 1st December 2015 will have their effective date backdated to 1st June 2015.

8.3.2 Applicants who require urgent re-housing as a result of violence or threats of violence, including intimidated witnesses, and those escaping anti-social behaviour or domestic abuse such that the facts and circumstances demonstrate to the council that the threat is immediate and it is not safe for the applicant / household to remain in their present accommodation may be awarded additional preference by means of backdating the effective date by six calendar months. The assessment will be based upon verification by officers within the police or other agencies as necessary in conjunction with a thorough risk assessment by the council.

**8.3.3 The scheme consists of 4 bands A- D. Detailed information is available in Appendix B.**

## **9. HOW TO APPLY TO THE HOUSING REGISTER**

Applicants must be eligible and must qualify to make a successful application to the register.

### **9. Registration process**

The Housing Register (referred to as ‘the register’ hereafter) is a key part of the allocation scheme. The register contains details of applicants who have applied for and been accepted on to it.

9.1 Applicants are strongly advised to consider whether they have a need for social housing before applying to go on the register. Acceptance on to the register does not guarantee an offer of housing. Other housing options may provide quicker or more appropriate accommodation. The Housing Advice Questionnaire offers personal advice on a range of housing options that might be more appropriate and can be viewed here.

9.2 All applicants must complete the application process to be considered for social housing by nomination from the council to a housing association. This includes providing the supporting evidence required to assess the application. Failure to provide the supporting documents will prevent the application from becoming ‘live’ and may lead to closure of the application. Applicants can apply to join the register by completing an on-line form. This can be done by clicking here.

9.3 Information on how to complete the form is available here as is the list of the evidence that needs to be supplied in support of the application. There is guidance to help complete the form as you follow it through online.

9.4 Paper application forms can be sent to older applicants, who have no access to the internet and live in a rural area, those are unable to read/write and in need of assistance.

### **9.5 Joint applications**

Joint applications can be made as long as at least one applicant is eligible. However, if only one party is eligible, should an offer be made by a housing association, only the eligible applicant will be offered a tenancy.

If a joint application is received where both are eligible but only one party qualifies under this policy, a sole tenancy should be offered to the qualifying tenant only.

Joint applicants can only make one application. In the case where two sole applicants wish to become joint applicants one of the applications must be withdrawn and the other amended to reflect the joint circumstances.

If both applicants are eligible and qualify then any offer made will usually be for a joint tenancy.

### **9.6 Multiple applications**

Multiple applications are not permitted. .

If an applicant is already registered the applicant must decide which application they want to retain. The other application will be closed. This will also apply to people who are registered as a joint applicant on more than one application.

### **9.7 Applicants currently serving a custodial sentence**

Applicants who are offenders, are currently detained and serving a custodial sentence, will have to have satisfied a local connection criterion prior to their sentencing to be accepted on to the register.

Applicants can request and complete a paper application form and can do so up to 2 months before their scheduled release.

Probation services will provide the completed form to the Housing Register team and the application is then registered. Supporting documents must be supplied within two weeks of release to retain the original registration date as the effective date for the application.

Applicants will be subject to a risk assessment and may be required to provide additional evidence to support the assessment process.

### **9.8 Who can be included in the application?**

The application can include the following household members:

- a) spouses or civil partners where the applicant lives with and/or intends to live with their spouse or civil partner
- b) partners where the applicant is cohabiting with a member of the same or opposite sex
- c) children who reside with, and are dependent on, the applicant. Children are defined as a young person under the age of 18 or in full time education. In respect of Childrens Wellbeing referrals only, children will be included where it has been agreed by the council that they will live with the applicant
- e) adult family members who have lived with the applicant for 2 years prior to the application being made. Adults are defined as being over the age of 18
- f) any other household member at the discretion of the Housing Register Team Lead and reasons for the decision noted on the application

### **9.9 Providing information and documentation**

- 9.9.1 During the application process, applicants will be asked to provide supporting evidence to verify their identity and personal circumstances e.g. their National Insurance number and proof of residency for themselves and anyone applying to be housed with them. A list of documents which can be used to support an application is available here.

**Without supporting evidence the application will not be assessed. This means that the applicant will not be nominated to any housing association to be considered for housing.**

**Failure to respond to a request for information within 28 calendar days, as part of the registration or verification process, will normally lead to closure of the application.**

- 9.9.2 Additional information and documentation must be provided if requested. It is the responsibility of the applicant to provide the information / documentation within the specified timescale. Failure to do so means that you are unlikely to be considered for an offer of housing through the nomination arrangements with the housing associations and your application may be closed.

- 9.9.3 Once an application is received, all applicants are assessed for any factors that establish a housing need. A financial assessment will be carried out as part of the assessment.

### **9.10 Verification and assessment**

The council's Housing Register team will take the necessary steps to verify information provided for the application to ensure an accurate assessment and to prevent fraud.

- 9.10.1 Verification may be carried out at the point of application, at notification of a change of circumstances or as part of the annual review process.
- 9.10.2 Applications are held on a computer system which holds all data relating to the application. Data is held in compliance with the Data Protection Act 2018 and the General Data Protection Regulation.
- 9.10.3 Applicants are assessed by a member of the Housing Register team under the direction of the Housing Register Team Lead and the Housing Solutions and Register Team Lead (or their successor posts).
- 9.10.4 The team carries out this assessment to ensure the applicant and members of the prospective household are eligible and qualify to be admitted on to the register, ascertain the level of priority they should receive and to take into consideration any other factors that might affect their application.
- 9.10.5 All applicants and members of their prospective households will be required to disclose any unspent criminal convictions or pending court cases.

### **9.11 Medical assessment**

- 9.11.1 Medical priority will be awarded according to the extent to which the health or welfare of one or more members of the applicant's household is affected by their housing conditions and the expected benefits of providing suitable alternative settled housing.
- 9.11.2 There are many conditions and illnesses for which medical priority is not granted. Medical awards may occur when there are mobility problems arising from a long term condition or illness and the applicant lives above the ground floor. Where conditions in a property or the behaviour of neighbours are causing a problem the most likely action would be to refer the matter to the landlord for resolution.
- 9.11.3 Medical assessments are considered by in-house staff and referrals made to independent professional services for more in depth review of cases, where appropriate. Any medical or health/welfare condition must be current, ongoing and evidence provided by health professionals if requested.
- 9.11.4 The council will not consider information that is more than 12 months old. In cases where information is more than 12 months old, applicants will be required to obtain a review of their health/welfare situation by a health professional. For housing register applicants the council will not pay for any reports or other evidence and it is the responsibility of the applicant to provide such evidence in all cases where required.



### **9.12 Effective date**

Priority within bands is determined by the length of time the applicant has been placed in the band. This may be either the date of registration or the date of entry to a higher band than the original assessment band. Applicants remaining in the same band after a change of circumstances will retain the date of registration as their effective date for determining time in a band.

### **9.13 Giving false information or deliberately withholding information**

The council takes its responsibility to make proper use of public resources very seriously. Applications for the register are investigated to ensure assessments and decisions are accurate. The council will require proof of information you have provided in your applications.

We are required to participate with other councils as part of the National Fraud Initiative. We also verify information provided.

This policy falls with the provisions of Part 6 of the Housing Act 1996. Section 171 of the Act states:

- (1) A person commits an offence if, in connection with the exercise by a local housing authority of their functions under this Part –
  - (a) He knowingly or recklessly makes a statement which is false in material particular, or
  - (b) He knowingly withholds information which the authority has reasonably required him to give in connection with the exercise of those functions

Where section 171 applies, Herefordshire Council may consider bringing a prosecution in accordance with its prosecution policy. Where the action or omission is less significant the applicant may be excluded from the register or may be placed in Band D.

Ground 17 in Schedule 2 to the Housing Act 1988 enables a housing association to seek possession of a tenancy granted as a result of a false statement by the tenant or a person acting at the tenant's instigation.

### **9.14 Confirming registration**

Applicants will receive written confirmation from the Housing Register team that their application has been registered together with:

- their registration/effective date;
- the band they have been awarded;
- confirmation of their bedroom eligibility;
- if the applicant is only eligible for certain types of properties;

- their unique reference number for use in accessing their application online.

Applicants must check the accuracy of this information as it will impact on their potential to be made an offer of housing.

Confirmation should be received within 28 days of the provision of all the required information in support of the application. Applicants will be advised by the Housing Register team if an extension of this timescale is required and the reason for the extension.

### 9.15 Change of Circumstances

Applicants should ensure that their contact details (e.g. mobile number, email address) are kept up to date.

a) Applicants **must** inform the Housing Register team if their personal circumstances change and it may be expected to have an effect on their housing register application. This includes any change in their address or household composition. Other examples include:

- Marriage/ civil partnership
- Pregnancy
- Changes in household composition
- Change in health

This is not an exhaustive list.

b) Changes in circumstances that lead to re-banding will be dealt with in accordance with this policy. The Housing Register team will re-assess an application where there has been a change of circumstances and will notify the applicant in writing that this has been done.

c) Where this has led to a change in banding applicants will be informed in writing stating the reasons, any time limits in the new banding, any change to the effective date and the right to request a review of the decision.

### 9.16 Annual Review

9.16.1 The Housing Register team undertake an annual review of applicants on the register. This helps to ensure that those on the register still retain a housing need. It is expected that all active applicants will bid for appropriate properties when advertised.

9.16.2 Each applicant will be contacted, in writing, close to the anniversary of their application to ascertain if they still retain a housing need. Should there be no response to this **within 28 calendar days**, the application will be suspended. Further written contact will be sent to the applicant notifying them their application is suspended and if they do not respond **within a further 14 days** their application will be closed.

9.16.3 Applicants who subsequently decide they wish to re-join the register will need to apply in the normal way and will have their current circumstances assessed. The application date will not be backdated under these circumstances.

### **9.17. Closure of Applications**

Applications will be closed where:

- an applicant is housed;
- an applicant has failed to provide supporting evidence in the given time period of 28 days (see above) or other time limits specified in correspondence;
- an applicant fails to respond to the annual review within the set timescale above;
- an applicant has moved and failed to notify the team;
- an applicant persistently fails to respond to communication or requests for information over a reasonable timescale;
- an applicant has made a request for the application to be closed.

Should an applicant subsequently wish to re-join the scheme then they will be required to complete a new application which will be processed accordingly based on their current circumstances and with a new registration date.

### **9.18. Right to review**

Applicants have the right to request a review of the decision made in the registration and allocation process. These include applicants who;

- are not eligible to join the register;
- are not a qualifying applicant;
- have had their application closed;
- have had a priority banding withdrawn;

The person carrying out the review will have had no prior involvement in the original decision. For further details see Appendix E.

## **10. PROPERTY SIZE NEEDED**

The table in Appendix C sets out the bedroom size of properties for which applicants will normally be nominated.

Below are circumstances in which the bedroom size may vary from that shown in the table in Appendix C.

### **10.1 Pregnancy**

For applicants who are pregnant, from receipt of the MAT B1 form by the housing register team the unborn child will be classed as an infant for the purposes of property size eligibility only. Where a household already has another child (other children) the unborn child will be classed as the same sex as the youngest child.

### **10.2 Extra room allowed for non-resident carers**

Applicants with a disability or a long term health condition who have a non-resident carer may be entitled to an extra bedroom if they can provide evidence that:

- they reasonably require overnight care and that this care is provided;
- one or more persons regularly stay overnight to provide care;
- there is a need for an extra bedroom that is used by a carer or carers for overnight stays as part of caring for the applicant or a household member.

A 'person who may need overnight care is defined as someone who is:

- receiving Disability Living Allowance middle or higher rate care or who receives the Personal Independence payment (PIP) daily living component enhanced rate and/or the mobility enhanced rate or Attendance Allowance.

If not in receipt of Disability Living Allowance, PIP or Attendance Allowance evidence must be provided to show that the care is required e.g. letter of confirmation from a medical practitioner.

### **10.3 Children / access to children**

For the purposes of this section of the policy a child is defined as someone who is either under the age of 18 or who is still dependent on the applicant e.g. due to continuing education.

Where parents who do not live together but have shared care of children apply, the children will be treated as living with the parent who provides their principal home and receives child benefit.

### **10.4 Fostering and adoption**

Where a household has formal evidence that, subject to a suitable home becoming available, approval would be given to foster or adopt a child or children, they may be included in the bedroom entitlement calculation. Verification of fostering and/or adoption arrangements may be carried out by the housing register team.

### **10.5 Sharers**

The policy enables two adults to register normally for upper floor (1st floor and above) flats only, although for applicants with a proven need for ground floor this restriction will be waived. Both parties must be eligible and qualify to go on the register and must be able to demonstrate to the

relevant housing association that they can sustain a tenancy. Applicants should note that HHL does not allow two unrelated people to hold a joint tenancy.

**10.6 It is normal practice for ALL applicants to be subject to a financial assessment by the landlord housing association prior to being made any offer and, where they are being considered for a larger property than that to which they would normally be entitled, will need to provide evidence that rent payments can be maintained over time.**

Housing associations' individual lettings policies may be viewed through their own websites (See Appendix A for contact details) and can be accessed here.

## 11. HOW PROPERTIES ARE LET

Each housing association working in Herefordshire has a lettings policy which sets out the rules by which their empty properties are let. It is possible to apply directly to each of the housing associations for the properties that are let outside the terms of the nomination agreements negotiated with the council. For prospective applicants who cannot meet the housing need criteria detailed in this policy, you should consider applying directly to the association(s) that might be able to meet your requirements. See Appendix A for website addresses or use the links from the housing register webpage, available here.

### 11.1 Nominations by the council

For each of the listed housing associations (see Appendix A) the council has negotiated rights to nominate people from the council's register for a percentage of the properties that become available for letting.

These percentages vary depending on the size, type and location of the stock of the individual housing association

The nomination process varies depending on the housing association which owns or manages the vacant property.

### 11. 2 Nomination process

A) Herefordshire Housing Limited (HHL), Stonewater and West Mercia Homes Ltd are using the Home Hunt online system to advertise their properties. Home Hunt can be accessed through the associations' websites.

i) The council is able to transfer data on a regular basis to the Home Hunt system. This data provides information about the applicant, the bedroom need, banding assessment and effective date. This information enables the Home Hunt system to shortlist applicants in order of priority

on the council's register so that offers can be made to those with the highest need as assessed through this allocation policy.

ii) The three providers will advertise their vacant properties through Home Hunt, giving information on location, size, rent, facilities and any restrictions on who is able to bid for them. Adverts may be placed on the site on **any day** of the week and will be advertised for a minimum of 7 days. Applicants should therefore visit the site regularly to check if new properties have become available. The advert will show the closing date for bids.

iii) Applicants should 'bid' for properties through the associations websites. The applications will be shortlisted by bedroom/ bed space need, banding and effective date of application. *The shortlists may include people who have not applied to the council but have applied directly to the individual housing association.* However, for those properties to which the council has nomination rights these applicants will not be considered for an offer unless there are no bidders from the council's register or no one from the council's register is suitable for the property.

iv) The association will undertake their internal processes for letting a property which will include assessment under their lettings policy and may include a request for further information or a home visit. This may include an assessment of the applicant's ability to pay the rent. Applicants need to provide any and all information requested from the association within the given timescale.

v) Any offer will normally be made to the applicant with the highest priority for the property size and type available in a given location. Applicants who are housed in accordance with the council's allocation policy will be counted as a nomination under the agreement with the housing association.

Final allocation decisions are made by the housing association which owns or manages the individual property not the council's Housing Register team.

## B) Fortis Living

i) The council is able to transfer data on a regular basis to the Fortis Living lettings system. This data provides information about the applicant, the bedroom need, banding assessment and effective date. This information enables the system to shortlist applicants in order of priority on the council's register.

ii) Fortis Living will advertise their vacant properties through their website, giving information on location, size, rent, facilities and any restrictions on who is able to bid for them. Adverts may be placed on the site on any day of the week and will be advertised for a minimum of 7 days. Applicants should therefore visit the site regularly to check if new properties have become available. The advert will show the closing date for bids.

iii) Applicants should 'bid' for properties via the Fortis Living website. The applications will be shortlisted by bedroom/ bed space need, banding and effective date of application. *The shortlists may include people who have not applied to the council but have applied directly to the individual housing association.* However, for those properties to which the council has nomination rights these applicants will not be considered for an offer unless there are no bidders from the council's register or there is no one from the council's register is suitable for the property.

iv) The association will undertake their internal processes for letting a property which will include assessment under their lettings policy and may include a request for further information or a home visit. This may include an affordability assessment. Applicants need to provide any and all information requested within the given timescale.

v) Any offer will normally be made to the applicant with the highest priority for the property size and type available in a chosen location. Applicants who are housed in compliance with the council's allocation policy will be counted as a nomination under the agreement with the housing association.

Final allocation decisions are made by the housing association which owns or manages the individual property not the council's Housing Register team.

C) Bromford, Guinness, Sanctuary, Shropshire, Two Rivers and all other housing associations with whom the council has nomination rights.

i) When a vacancy arises in the rented stock of one of the above housing associations, and the property has been made available for nomination, the Housing Register team will shortlist by bedroom need, banding and effective date. This information will be sent to the relevant housing association by secure email.

ii) The association will undertake their internal processes for letting a property which may include a request for further information or a home visit. This may include an affordability assessment. Applicants need to provide any and all information requested within the given timescale.

iii) Any offer will normally be made to the applicant with the highest priority for the property size and type available in a chosen location.

Final allocation decisions are made by the housing association which owns or manages the individual property not the council's Housing Register team.

**11.3** Landlords are entitled to carry out an affordability assessment to ensure that the tenancy would be financially viable i.e. that the applicant can pay the rent. Where the assessment shows that the tenancy would not be sustainable the landlord may choose

not proceed with an offer, advising the applicant of the outcome of the assessment but may advise on actions to address affordability to enable future potential offers to proceed.

#### **11.4 Skipping or overlooking nominees.**

There are circumstances where the Housing Register team may need to, and have the discretion to, skip nominating an applicant.

Potential grounds for overlooking for a nomination include:

- Does not meet the requirements such as the age restriction, or local connection criteria for property;
- Outstanding housing related debt/ non-compliance with arrangement to pay housing related debt;
- Essential need for another applicant to live close to another person or facility within the county;
- The applicant has not given consent to share information;
- There is no relevant support package in place.

This list is not exhaustive.

#### **11.5 Direct lets**

Where possible all allocations are made through the process described above. However, a small number of applicants may meet a reasonable preference but their circumstances mean that they have an urgent need requiring a direct allocation to a property.

The council reserves the right to negotiate a direct offer of accommodation to ensure the best use of the housing stock to meet the needs of an applicant. Examples may include, but are not limited to:

- An urgent move is required because of violence or threat of violence;
- An applicant has been accepted as a homeless household by the council and has failed to bid or been unsuccessful in securing accommodation;
- Move on from supported or specialised accommodation;
- Needs an appropriately adapted property;
- In association with referrals from statutory agencies;
- Essential need for a priority applicant to live close to another person.



## 12. OFFERS

**12.1** Applicants should note that all offers of housing are made by the housing association **not** the council. Queries about available properties or offers of properties should be made to the housing association not the Housing Register team.

**12.2** If you are made an offer or invited to view a property further verification of circumstances may be undertaken to ensure you still qualify for the property prior to an offer being made. Applicants will be required to provide information within a specified timescale.

**12.3** Before offering a property to an applicant the following checks will be made:

- The band award is correct;
- Circumstances have not changed;
- Household composition matches the property size;
- Any other restrictions placed upon the property or applicant that would prevent them from receiving an offer.

This is not a definitive list. Landlords may undertake further checks.

**12.4** Offers may be made in writing, by phone or in person. Offers to households owed a full duty under the homelessness legislation will be in writing but may be sent via text or email as well as by post. Applicants should be made aware of the timescale in which they must respond. This should not be less than 2 working days.

Applicants will be given at least 1 working day to respond to an offer after viewing the property.

### **12.5 Refusals of offers**

If an applicant refuses an offer, they will be expected to provide the reasons for the refusal. This information is necessary to identify why the property was not acceptable and to ensure that future offers are more likely to be accepted.

Applicants who refuse more than 2 reasonable offers in a 12 month period will have their application suspended. Landlords should advise applicants at the time of their refusal if they consider it to be unreasonable. In these circumstances the Housing Register team will review the reasons for refusal and may re-assess the fitness of the applicant to remain on the housing register.

Applicants will be advised in writing of the outcome of the re-assessment. If the refusals are found to be unreasonable the application will normally be closed and the applicant will not be eligible to re-apply for 12 months from the date the application is closed. Applicants have the right to request a review of this decision. For further details see Appendix E.

## **12.6 Withdrawal of Offers**

In exceptional circumstances a senior officer of a housing association may authorise the withdrawal of an offer. Circumstances may include, but are not limited to:

- where it is clear that an applicant is not capable of understanding the responsibilities associated with being a tenant or they do not clearly understand what they are signing when asked to sign a tenancy agreement or associated paperwork;
- the current tenant of the property being advertised has withdrawn their notice terminating their tenancy of that property, so the property is no longer available ;
- when an applicant has failed to respond to contact from a housing association after 3 days.

## **12.7 Housing Association exclusion or restricted access policies**

The council operates qualification rules which restrict access to the register for applicants whose prior behaviour has not met the standard required for prospective tenants. Applicants can find further information about disqualification on these grounds in Appendix D.

Applicants should also be aware that individual housing associations have their own exclusion policies which may adversely affect the likelihood that an applicant will receive an offer of accommodation. Exclusion policies are usually contained within the lettings policy but in some instances there may be a standalone policy. These documents are available on the individual housing association's website.

While the Council acknowledges the right of their housing association partners to formulate their own lettings and exclusion policies, it is expected that these will be fair and reasonable, minimising the risk of exclusion from social housing by ensuring that they are applied to reflect the spirit of published allocation policies, including this overarching allocation policy.

The Council expects exclusion policies to be flexible, with cases being considered on an individual basis. The following criteria should be applied:

- there must be reliable evidence of unacceptable behaviour;
- there should not be inflexible specific time periods as far as possible;
- registered providers should communicate effectively with the applicant and the Housing Register team about exclusions;
- there should be provision for discretion;
- there should be a recognition where special circumstance arise e.g. people with learning disabilities, mental health issues, statutory homelessness duties arise.

Each case should be considered upon its own merits and subject to the spirit of the Rehabilitation of Offenders Act 1974, as amended, according to individual circumstances.

Housing associations' individual lettings policies may be viewed through their own websites and can also be accessed here.

## **12.8 Publishing feedback for properties let through the nomination arrangements**

The Housing Register team will publish lettings results provided by the housing associations on the website and will include the following information:

- The street address;
- The closing date of the bidding cycle;
- The total number of bids made for the property;
- The successful applicant's priority band and effective date.

This feedback helps applicants understand the likelihood of success in obtaining housing through the nomination arrangements with the housing associations.

Lettings are monitored by the Housing Register team to ensure that the council's statutory duties are being achieved and to provide information to support the council's strategic housing role.

## **13. HOMELESS HOUSEHOLDS WHO ARE OWED THE FULL HOMELESSNESS DUTY**

**13.1** Homelessness assessments are determined by a Housing Solutions Officer on behalf of Herefordshire Council where the council accepts a statutory duty to provide secure accommodation, under the Housing Act 1996 s. 193(2), s 195(2) or other statutory duties.

**13.1.1.** Applicants accepted as homeless who are owed the full homelessness duty may bid through the Herefordshire Housing Ltd, Stonewater, West Mercia Homes and the Fortis Living websites. Households may also be nominated for a vacancy in the stock of associations not using this process.

**13.1.2** The bidding/ response to nomination history of applicants accepted for full homelessness duty will be reviewed towards the end of the 12 week period (see Appendix B: Banding criteria). This will ensure that homeless applicants capitalise on their banding and receive support to be successful in obtaining an offer if required.

**13.1.3** Applicants should not decline an offer made as a final discharge of the homelessness duty. If they do so Herefordshire Council may decide that its duty has been discharged and the household's banding will be re-assessed. The applicant retains the right to

request a review of the suitability whether or not they accept the offer. For information on the review process please see Appendix E.

## **13.2 Direct offers**

**13.2.1** There are circumstances where a property may be let by a direct offer. This may be done where households, accepted as homeless, have failed to bid for properties that were available and suitable for their needs, have been unsuccessful in bidding for suitable properties or have been unsuccessful in obtaining a suitable property through the nomination process.

**13.2.2** Applicants should not decline an offer made as a final discharge of the homelessness duty. If they do Herefordshire Council may discharge its full housing duty, removing any provision of temporary accommodation and impacting on the applicants banding. The applicant retains any right to request a review of the suitability.

## **13.4 Discharge of the Full Homelessness Duty to the Private Rented Sector**

Where the homelessness duty is discharged to the Private Rented Sector, applicants who are subsequently given a section 21 notice to leave within two years of the offer being accepted, where the applicant is eligible for assistance and not intentionally homeless, any homelessness duty to secure further suitable accommodation is revived. The duty revives even if the applicant no longer has a priority need, but it only applies to the first incidence of homelessness within the two year period.

# **14. MANAGING CHANGES**

## **Managing Changes**

The Council wishes to retain flexibility in operational processes and procedures in order to respond to changes arising from case law and regulatory changes, whilst still operating within the principles set out in this policy.

This policy is subject to regular review, and where the policy requires changes which are minor in nature, or where the changes are required urgently for legal reasons or changes in government policy and / or legislation, these changes will be approved by the Director for Adults and Wellbeing under the Council's scheme of delegation

All changes to this policy will be noted within the Version Control of this document and an updated document will be uploaded to the council's Housing Register web page.

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## 15. APPENDICES

### APPENDIX A: List of housing associations and contact details

**Bromford.**



Bromford.  
1 Exchange Court  
Brabourne Avenue  
Wolverhampton  
WV10 6AU

Tel: 0330 1234 034

Email: [customerservices@bromford.co.uk](mailto:customerservices@bromford.co.uk)  
Website: [www.bromford.co.uk](http://www.bromford.co.uk)

Telephone - Customer Contact team on: 01202 319 119

Address: -  
Suite C, Lancaster House  
Grange Business Park  
Enderby Road  
Leicester  
LE8 6EP

Email: [Customers@stonewater.org](mailto:Customers@stonewater.org)  
Website: [www.stonewater.org](http://www.stonewater.org)



Progress House,  
Midland Road,  
Worcester,  
WR5 1DU

Tel; 0330 123 0700  
Email: [info@fortisliving.com](mailto:info@fortisliving.com)  
Website: [www.fortisliving.com](http://www.fortisliving.com)

Sanctuary Housing Association  
Marybone House,  
2 Marybone, Liverpool L3 2BY

Telephone - 0300 123 3511

Email: [contactus@sanctuary-housing.co.uk](mailto:contactus@sanctuary-housing.co.uk)  
Website: [www.sanctuary-housing.co.uk](http://www.sanctuary-housing.co.uk)



Housing Register team  
Blueschool House  
Blueschool Road  
Hereford  
HR1 2LX

Tel: 01432 261 600

Website: [www.herefordshire.gov.uk](http://www.herefordshire.gov.uk)



South Shropshire Housing Association  
The Gateway  
Auction Yard  
Craven Arms  
Shropshire, SY7 9BW  
Tel: 0300 303 1190

Email: [enquiries@shropshirehousing.org.uk](mailto:enquiries@shropshirehousing.org.uk)

Website: [www.shropshirehousing.org.uk](http://www.shropshirehousing.org.uk)



Herefordshire Housing Ltd  
Legion Way  
Hereford  
HR1 1LN  
Tel: 0300 777 4321

Website: [www.hhl.org.uk](http://www.hhl.org.uk)



Two Rivers Housing  
Rivers Meet  
Cleeve Mill Lane, Newent  
Gloucestershire  
GL18 1DS  
Tel: 0800 316 0897

Email: [customerservices@2rh.org.uk](mailto:customerservices@2rh.org.uk)

Website: [www.tworivershousing.org.uk](http://www.tworivershousing.org.uk)



West Mercia Homes  
4040 Lakeside  
Solihull Parkway  
Birmingham  
B37 7YN  
Email: [infor@wmhousing.co.uk](mailto:infor@wmhousing.co.uk)  
Tel: 0300 790 6531  
Website: <https://www.wmhousing.co.uk/>

Insert logo

The Guinness Partnership  
Gloucester Officer  
2 St Michael's Court  
Brunswick Road  
Gloucester, GL1 1JB  
08456 044 529

Website: [www.guinnesspartnership.com](http://www.guinnesspartnership.com)

## APPENDIX B: Banding criteria detail

| <b>Band A – Time limited</b>                              |   |
|---|---|
| Major adaptations no longer required                      | <p>Tenants of housing associations who no longer require a property where major adaptations such as a stair lift or level access shower have been installed.</p> <p style="color: red;"><b>Time limited to 6 months</b></p>   |
| Statutory or severe overcrowding (reasonable preference ) | <p>This is awarded where a household is either, by the room standard of Part X of the Housing Act 1985, severely overcrowded by at least two bed spaces, or fails the bedroom standard of the Housing Health and Safety Ratings System (HHSRS) by at least three bed spaces and has not deliberately worsened their housing situation.</p> <p>Applicants may need to provide bedroom sizes in order for household bedroom space requirements to be assessed.</p> <p>Applicants are expected to use space appropriately and no account is taken of possessions or furniture in the assessment of overcrowding.</p> <p>A room intended for use as a bedroom but used for another purpose will still be classified as a bedroom, subject to it meeting the space standards for bedrooms.</p> <p>Assessment of overcrowding in bedsitting rooms/studio apartments will be based on Herefordshire Council's Amenity and Facility standards in a HMO, available at:<br/> <a href="https://www.herefordshire.gov.uk/downloads/file/2075/amenity_and_facility_standards">https://www.herefordshire.gov.uk/downloads/file/2075/amenity_and_facility_standards</a></p> <p>Discretion can be exercised by housing register staff to adjust the number of bedrooms required if:</p> <ul style="list-style-type: none"> <li>• the bedrooms in the property are particularly large or small;</li> <li>• a couple need separate bedrooms due to disability;</li> <li>• a child requires their own bedroom due to disability.</li> </ul> <p style="color: red;"><b>Time limited to 6 months</b></p> |
| Serious state of disrepair (reasonable preference)        | <p>Households will be placed in this band in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Where the hazard(s) are so severe or numerous that the most appropriate course of action would be to prohibit the property from residential use.</li> </ul> <p>There is a process for the assessment of hazards under the HHSRS and applicants will be expected to work with the Council and landlords in complying with, and following, the actions that are required.</p> <p style="color: red;"><b>Time limited to 6 months.</b></p>  |



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| <p>Homeless households who are owed a full housing duty (reasonable preference)</p>                     | <p>Households that have been accepted as homeless by Herefordshire Council under part 7 of the Housing Act 1996 and who are owed the ‘full duty’ under s. 193(2) (in priority need and unintentionally homeless), or s. 195(2) (unintentional, in priority need and threatened with homelessness) of the Housing Act 1996, or ss. 65(2) or 68(2) of the Housing Act 1985.<br/>ONE SUITABLE OFFER ONLY</p> <p>Applicants have the right to a review that accommodation offered is suitable, if the accommodation is being offered to meet or end the ‘main housing duty’. See Appendix E for more details.</p> <p><b>Time limited to 12 weeks</b></p> |
| <p>Hospital discharge (reasonable preference)</p>   | <p>Assessment by the Hospital Discharge Officer where a patient has no appropriate secure housing to return to and/or their housing cannot be made suitable through adaptations due to cost, structural difficulties or within a three month to meet their needs.</p> <p>Applicants have the right to a review that accommodation offered is suitable, if the accommodation is being offered to meet or end the ‘main housing duty’. See Appendix E for more details.</p> <p><b>Time limited to 12 weeks</b></p>   |
| <p>Referral from Herefordshire Council’s Adults and Wellbeing or Children’s Wellbeing Directorates.</p> | <p>Households who require urgent alternative accommodation on safeguarding grounds to protect vulnerable children or adults from immediate abuse or neglect occurring in or around the locality in which they currently live.</p> <p>Referrals must be made formally and in writing and be approved by Safeguarding Lead or Operational Service Manager in Adults and Wellbeing or a Head of Service in Childrens Wellbeing.</p> <p>Award of this priority is subject to referral to, and agreement from, Head of Prevention and Support, Adults and Wellbeing Directorate.</p> <p><b>Time limited to 12 weeks</b></p>                               |
|   | <p><b>BAND B</b></p>   |
| <p>Accessible home</p>  | <p>Current property cannot be made suitable through adaptations due to cost, structural difficulties or tenure issues. Must be assessed as requiring accessible home by Occupational Therapist.</p> <p>This may include, but is not limited to :</p> <ul style="list-style-type: none"> <li>• Applicants requiring wheelchair accessible accommodation.</li> <li>• Applicants able to manage only a limited number of steps.</li> </ul>  |
| <p>Care Leaver (reasonable preference )</p>   | <p>Referrals from Head of Looked After Children in Children’s Wellbeing Directorate under s.27 Children Act 1989 or where the young person is deemed to be a relevant or eligible child or a former relevant or qualifying care leaver under the Children (Leaving Care) Act 2000, as amended.</p>   |

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|  | The applicant will need to be ready for independent living and have an appropriate pathway plan and support package in place, as agreed between relevant organisations.   |
| End of Agricultural or service tied tenancy                                | <p>This may apply to:</p> <ul style="list-style-type: none"> <li>households where an agricultural worker is being displaced to accommodate another agricultural worker and the farmer cannot provide suitable alternative accommodation;</li> </ul> <p>The Rent (Agriculture) Act 1976 requires a local housing authority to use their best endeavours to provide accommodation for a qualifying displaced agricultural worker subject to the provisions of s.27. If the authority is satisfied that the applicant's case is substantiated, it is a duty to endeavour to provide suitable alternative accommodation for the displaced worker;</p> <ul style="list-style-type: none"> <li>households in council service or related tenancies, or where occupancy of a council property is related to their employment, which is coming to an end.</li> </ul> |
| Lacking facilities (reasonable preference)                                 | <p>Households who do not have access to a bathroom, kitchen or inside WC or whose accommodation lacks hot or cold water supplies, electricity supply or provision of sources of, or for, heating.</p> <p>Checks will be made with the landlord and through other resources to confirm the housing circumstances of the applicant.</p>   |
| Sharing facilities with non-family members (reasonable preference)         | <p>Households sharing a kitchen and bathroom/WC with non-family members who are not included on the application. Family members include parents, step parents, children, step-children, siblings and step siblings and grandparents.</p> <p>Checks will be made with the landlord and through other resources to confirm the housing circumstances of the applicant.</p>  |
| Move on from supported/ specialised accommodation (reasonable preference ) | <p>Tenants/licensees of supported or specialised housing who have been there for a period of at least six months normally and have been assessed by their support provider as being ready to move into settled or alternative accommodation. Formal assessment and confirmation of that assessment will be required.</p> <p>For the purposes of this assessment, supported housing does NOT include crash pad type accommodation.</p> <p>The agreement between Herefordshire Council and the supported housing provider will require that, where appropriate, arrangements will be made for ongoing support in the new tenancy.</p>   |
| Overcrowding by 1 or 2 bed spaces (reasonable preference)                  | <p>Households where the property is by the room standard of Part X of the Housing Act 1985, overcrowded by at least one bed space, or fails the bedroom standard of the Housing Health and Safety Ratings System (HHSRS) by at least two bed spaces and the household has not deliberately worsened their housing situation.</p> <p>Applicants may need to provide bedroom sizes in order for household bedroom space requirements to be assessed.</p>  |

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|  | <p>Applicants are expected to use space appropriately and no account is taken of possessions or furniture in the assessment of overcrowding.</p> <p>A room intended for use as a bedroom but used for another purpose will still be classified as a bedroom, subject to it meeting the space standards for bedrooms.</p> <p>Assessment of overcrowding in bedsitting rooms/studio apartments will be based on Herefordshire Council's Amenity and Facility standards in a HMO, available at:<br/> <a href="https://www.herefordshire.gov.uk/downloads/file/2075/amenity_and_facility_standards">https://www.herefordshire.gov.uk/downloads/file/2075/amenity_and_facility_standards</a></p> <p>Discretion can be exercised by the housing register staff to adjust the number of bedrooms required if:</p> <ul style="list-style-type: none"> <li>• the bedrooms in the property are particularly large or small;</li> <li>• a couple need separate bedrooms due to disability;</li> <li>• a child requires their own bedroom due to disability.</li> </ul> |
| Right to move for social housing tenants                       | <p>In accordance with the Right to Move guidance 2015, this applies to a social housing tenant who works in the county or has the offer of work in the county but does not currently live in the county. The regulations only apply if work is not short-term or marginal in nature, nor ancillary to work in another district. Voluntary work is also excluded. A contract of employment that was intended to last for less than 12 months is considered to be short-term. Employment of less than 16 hours a week is too few hours to benefit from the Right to Move regulations.</p> <p>Assessment will follow the 'urgent need to move on hardship grounds' process used for those with a local connection to Herefordshire.</p>  |
| Relief of homelessness (reasonable preference)                 | <p>Households where the council has accepted a duty under s.189B Homelessness Reduction Act 2017.</p>   |
| Sharing facilities : three generations (reasonable preference) | <p>Household sharing a kitchen and bathroom/WC with family members who are not on the application for housing where there are at least three generations living in the same home. Family members would include parents, step parents, children, step-children, siblings and step siblings and grandparents. Three generations mean, for example, child, parents and grandparents.</p> <p>Checks will be made with the landlord and through other resources to confirm the housing circumstances of the applicant.</p>   |
| Verified harassment/ witness intimidation/ domestic abuse      | <p>Households where the police, or relevant agency, confirm that there is an urgent need for alternative accommodation to protect witnesses, whose actions in reporting crime led to them becoming unsafe in their own home, or to prevent severe harassment and, normally, where prosecution of the offender is intended. There must be a clear history and alternative solutions must have been explored and exhausted by the landlord.</p> <p>Applicants escaping domestic abuse where the police or relevant agency</p>   |

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|   | confirm that there is an urgent need for alternative accommodation to protect the household. Applicants identified through MARAC may be awarded this banding.   |
| Verified urgent medical/welfare need (reasonable preference)                                | <p>Households where there is an urgent need to move to prevent significant deterioration, or where a move could improve significantly, health or welfare of the household through the provision of a different type of accommodation. Rehousing must achieve a significant health gain. Medical evidence will be required and will be used to assess banding. This banding will not be awarded where the need is temporary as a result of injury or surgery.</p> <p>Welfare need includes moving to build a stable life such as that provided through the foster care or adoption process.</p> <p>Applicants identified through the MAPPA (the Multi Agency Public Protection Panel Arrangements) may be dealt with through this banding criterion, as determined by Herefordshire Council in partnership with West Mercia Probation and/ or West Mercia Police.</p> <p>A recommendation to be placed in this category is only likely to be made when all options to improve the current accommodation have been exhausted.</p> |
| Verified urgent need to move to a particular area to avoid hardship (reasonable preference) | <p>Households who need to move due to employment, education or training, or for another verified reason where the household has no access to a private vehicle OR the use of public transport is not available AND the journey, either by private or public transport, would take over 1.5 hours in each direction.</p> <p>Applicants who need to move urgently to give or receive support, such as in the case of elderly parents wishing to move closer to family, will need to provide confirmation of the support provision available, and a health and well-being assessment may be required to determine the most appropriate type of housing for the person's needs. The assessment may include typical travel time.</p>   |
| <b>Band C</b>   |   |
| Affordability   | This applies to households where 30% or more of gross income is spent on rent, excluding child benefit, attendance allowance, DLA, PIP or carer's allowance (or successor benefits). Applicants will need to provide financial evidence for an income/expenditure assessment to be completed.   |
| Children aged 8 or under living above first floor (reasonable preference)                   | This applies to households where there is one child (or more) aged 8 or under. Households must live above the ground and first floor. This priority will cease when the youngest child reaches the age of 9.  |
| Intentional homeless (reasonable preference)  | As defined by the Housing Act 1996, as amended. This applies to households who are assessed by Herefordshire Council's Housing Solutions team as being intentionally homeless. Some households may be subject to  |

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| preference)   | reduced preference banding due to the reason for their assessment as intentionally homeless.   |
| Under-occupation by a social housing tenant                     | Social housing tenants not in a reasonable preference category but releasing family sized (2 or more bedrooms) accommodation<br>Checks will be made with the relevant landlord to validate the application by reference to the housing association's own lettings criteria and to ensure that the property would be suitable for re-letting.   |
| Verified medical/welfare need (reasonable preference)           | Households where there is a need to move to prevent deterioration, or where a move could improve the health or welfare of the household through the provision of a different type of accommodation. Rehousing must achieve a quantifiable health gain. Medical evidence will be required and will be used to assess banding. This banding will not be awarded where the need is temporary as a result of injury or surgery.<br><br>Welfare need includes moving to build a stable life such as that provided through the foster care or adoption process.<br><br>A recommendation to be placed in this category is only likely to be made when options to improve the current accommodation have been exhausted. |
| Verified need to move to avoid hardship (reasonable preference) | Households who need to move due to employment, education or training, where the household has no access to a private vehicle OR the use of public transport is not available AND the journey would take over 1 hour in each direction.<br>Applicants who need to move to give or receive support will need to provide confirmation of the support provision available, and a health and well-being assessment may be required to determine the most appropriate type of property for the person's needs. The assessment will include typical travel time and individual circumstances when assessing travel.   |
| Prevention of homelessness (reasonable preference)              | Households where the council has accepted a duty under s.195 Homelessness Reduction Act 2017.  |
| Proven need for sheltered housing with assets up to £150K       | Property owners or those with other assets over the age of 60 in need of sheltered/ independent living accommodation but whose ability to access open market provision is limited due to total capital assets and/or savings of under £150K. Applicants will need to provide evidence of assets, including the value of any property or assets owned or disposed of within the previous 5 year period.<br><i>There will be an assessment of the need for sheltered/ independent living accommodation by housing associations before any offer is made.</i>   |

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| Relationship breakdown                           | <p>This applies to the single partner who is leaving the family home where there are dependent children involved and insufficient financial resources to meet the housing needs of the person who will not be living with the children on a daily basis. Appropriate documentation must be submitted to confirm the arrangements for any children of the relationship and, where appropriate, that divorce or legal separation has been applied for, whether or not the sale or transfer of ownership of the property has been agreed and/ or completed. Any property that is to be sold must be put on sale prior to acceptance on to the register.</p> <p>Both partners will be required to submit financial information for the assessment of their resources and the partner applying to be rehoused will only be eligible for a property meeting their specific needs i.e. bedroom eligibility will normally not include provision for children.</p> |
| Rural localities /s.106 local connection schemes | <p>In order to promote sustainable communities, households that do not have a housing need under other criteria in this allocation scheme but have a local connection to a specific parish or ward may qualify for section 106 affordable housing developments in the parish or ward to which they have a local connection.</p> <p>Applicants will be required to provide evidence of their local connection to specific settlements and will only qualify for housing in the settlements to which they have the local connection as specified in the relevant s106 agreement. Bids to properties in places to which these applicants have no local connection will be skipped.</p>   |
| Sharers  | <p>This applies to adults living in the family home, or sharing with non-family members or not in settled accommodation who apply to share as joint tenants for properties normally on the first floor and above. Applicants will need to demonstrate to the relevant housing association partner that they can sustain a joint tenancy. Applicants should note that HHL does not allow two unrelated people to hold a joint tenancy.</p>   |
|  | <b>Band D</b>   |
| Applicants/ households who:                      | <p>Applicants who are within the reasonable preference categories, as identified in this banding scheme, but who do not have a local connection, as defined in this policy, to the county of Herefordshire.</p>   |
| Deliberately worsened housing circumstances      | <p>Have deliberately worsened their housing circumstances within the last 12 months. This may refer to circumstances such as where households have given up secure accommodation, have allowed additional people to move into a home when there is insufficient bedroom space or have damaged property such that fittings or facilities provided are not usable or the cost of repair is significantly above normal fair wear and tear costs expected over the length of the occupancy.</p> <p>Applicants who have transferred ownership of a property within the past 5</p>  |

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|                       | <p>years may be considered to have deliberately worsened their housing circumstances.</p> <p>The applicant will be expected to follow advice on the actions they need to take to enable their application to be re-assessed. This may include, for instance, making payment towards the cost of the damage.</p>   |
| Housing related debts | <p>Have housing related debts to the local authority or a housing association. This may include rent arrears, former tenant arrears, charges related to damage to property, outstanding rechargeable repairs, unpaid loans or deposits provided in relation to accommodation, arrears from temporary accommodation placements and council tax arrears.</p> <p>This applies to applicants with debts of over £100. It does not apply where applicants were not notified of the requirement to pay at the time the charge was implemented or of the level of arrears/outstanding debt within 4 weeks of cessation of the provision, subject to the organisation having the new address details.</p> <p>Applicants whose debt is less than £100 will be placed in the appropriate band to their housing need, but they will be required to make an arrangement to clear the outstanding debt through regular payments.</p> <p>Housing related debts that have been written-off previously may be reinstated.</p> <p>The applicant will be expected to follow advice on the actions they need to take to enable their application to be re-assessed.</p> <p>Applicants with housing related debt should refer to Appendix B of this policy.</p> |
| Anti-social behaviour | <p>Have committed acts of anti-social behaviour or other breaches of tenancy not severe enough to have been subject to an outright possession order.</p> <p>This may include, but is not limited to, causing nuisance and annoyance to neighbours or visitors, noise nuisance, threats towards members of the community or staff members, being abusive towards a partner or family member, allowing the condition of a property deteriorate, allowing any furniture or fixtures provided by the landlord to deteriorate and/or paying money to illegally obtain a tenancy.</p> <p>There is no requirement for the applicant or member of the applicant's household to have been convicted of such behaviour but applicants should only be placed in band D where there is sufficient evidence to conclude that, on the balance of probability, the behaviour has taken place.</p> <p>The applicant will be expected to follow advice on the actions they need to take to enable their application to be re-assessed.</p> <p>Applicants placed in band D for this reason should refer to Appendix B of this policy.</p>   |
| False                 | <p>Have provided false information on their application for social housing. Where</p>   |

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|-------------------------------|---|
| <p>statements</p>             | <p>there is a suspicion or allegation that a person has provided false information or withheld information the application will not be made active until an investigation has been completed.</p> <p>If false information has been provided or withheld the application will be re-assessed and, depending on the seriousness of the false information provided, this may result the applicant may be liable to exclusion from the register and prosecution.</p> <p>If false information has resulted in an applicant being housed erroneously legal action will be taken to evict the household and exclude them from the register.</p> <p>If the false information is not of a fundamentally serious nature the application will be placed in Band D and the applicant will be required to take action to address the issue.</p> <p>The applicant will be expected to follow advice on the actions they need to take to enable their application to be re-assessed.</p> |
| <p>Intentionally homeless</p> | <p>Have been found to be intentionally homeless under Part 7 Housing Act 1996 by the council's Housing Solutions team for any reason other than the criteria listed in Band D above.</p> <p>The applicant will be expected to follow advice on the actions they need to take to enable their application to be re-assessed.</p>   |



## APPENDIX C: Property size eligibility

### 1. Property Size

The table overleaf shows the size of properties that applicants are eligible for based on their household composition.

a) Households claiming benefits should be aware that there is a limit on their eligibility for housing benefit/ the housing element of universal credit based on the government's assessment of their household's bedroom need.

The rules restrict the amount of benefit based on the size of the accommodation and the number of people in the household.

When determining how many bedrooms needed, a set formula is used. One bedroom is allowed for each of the following:

- a single claimant or any adult couple
- any two children aged under 10
- any two children of the same sex aged 15 or under
- any other adult aged 16 or over
- any other child
- a non-resident carer

Additional bedrooms can also be allowed in certain specific circumstances

Where an applicant is offered a property that is deemed larger than necessary by the housing benefit or Universal Credit regulations, the housing association will undertake a financial assessment with the applicant to ensure that the rent is affordable to the household.

b) The government is changing the way that benefits are paid. Universal Credit is the name for the monthly combined payment that will eventually be paid to all working age residents who are on a low income or out of work. Universal Credit is made up of different amounts, called 'elements' depending on individual circumstances. The housing element of the Universal Credit payment helps tenants with their eligible rent and service charge costs. Further information is available on the website [www.gov.uk](http://www.gov.uk).

c) A number of flats and bungalows are restricted to people over a specified age or on the basis of need /support to help applicants maintain their independence. It is sometimes possible in these schemes to offer a larger property than shown below, subject to an applicant being able to afford the rent.

d) Applicants for sheltered accommodation will be assessed as to whether they need this type of accommodation.

e) Pregnant applicants without other children will be eligible primarily for 2 bedroom 3 person accommodation to enable larger three or four person households requiring to be housed in the larger 2 bedroom 4 person bedroom properties.

f) In rural areas, where one bedroom non-elderly housing is very limited, under-occupation may be permitted in two bedroom properties, if the housing association is satisfied that the household can afford the rent.

g) There are very few larger properties in Herefordshire. By larger we mean those properties that are designed for households needing more than FIVE bed spaces.

h) Larger properties are normally offered to households that are in need of the number of bed spaces provided. Applicants should be aware that although they may be able to register an interest in a property which has more bed spaces than they need, priority is generally given to those who need the full amount of bedrooms and bed spaces available.

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| PROPERTY SIZE ELIGIBILITY  |                        |          |                      |                   |          |                   |          |                  |
|--|------------------------|----------|----------------------|-------------------|----------|-------------------|----------|------------------|
| Household size   | Suitable property size |          |                      |                   |          |                   |          |                  |
|  | Bedsit/<br>studio      | 1<br>Bed | 2 Bed<br>3<br>Person | 2 Bed 4<br>Person | 3<br>Bed | 4 Bed 6<br>Person | 4<br>Bed | <b>5<br/>Bed</b> |
| Single person  |                        |          |                      |                   |          |                   |          |                  |
| Single person or couple<br>without children  |                        |          |                      |                   |          |                   |          |                  |
| Single person or couple<br>without children over 55  |                        |          |                      |                   |          |                   |          |                  |
| Pregnant applicant (25<br>weeks onwards)   |                        |          |                      |                   |          |                   |          |                  |
| 2 adult sharers  |                        |          |                      |                   |          |                   |          |                  |
| Parent(s) and one child  |                        |          |                      |                   |          |                   |          |                  |
| Parent(s) and 2 children<br>regardless of gender aged<br>0- 9.                                     |                        |          |                      |                   |          |                   |          |                  |
| Parent(s) and 2 children<br>same gender aged 0 -15,<br>less than 10 years age<br>difference.       |                        |          |                      |                   |          |                   |          |                  |
| Parent(s) with 2 children<br>same gender aged 0-15<br>with greater than 10 years<br>age difference |                        |          |                      |                   |          |                   |          |                  |
| Parent(s) and 2 children<br>different gender one aged<br>over 9 years                              |                        |          |                      |                   |          |                   |          |                  |
| Parent(s) and 3 children<br>any gender mix aged 0-15   |                        |          |                      |                   |          |                   |          |                  |
| Parent(s) and 3 children,<br>one child over 15, other<br>children of different gender              |                        |          |                      |                   |          |                   |          |                  |
| Parent(s) and 4 children   |                        |          |                      |                   |          |                   |          |                  |
| Parent(s) with 5+ children   |                        |          |                      |                   |          |                   |          |                  |

## **APPENDIX D: Exclusions from the Register and Reduced Preference**

### **1. What is meant by exclusion and reduced preference?**

#### **1.1 Exclusions**

These occur when an applicant has been assessed but, due to their behaviour, they are excluded for a period of 12 months during which time the applicant should address the cause of their exclusion. Generally the applicant will be expected to take specific action, of which they will be advised, such as making payments to reduce arrears.

#### **1.2 Reduced Preference**

This occurs in two circumstances:

- i) when an applicant has been assessed for and accepted onto the Housing Register team and is informed that their priority for housing has been reduced because of their behaviour. They have been placed into a lower band. They will remain in the lower band until their conduct or their debt has improved or there has been a change in circumstances. Generally the applicant will be expected to take specific action, of which they will be advised, to address such as making payments to reduce arrears.
- ii) when an applicant is assessed as having a reasonable preference but does not have a local connection to the county.

### **2. Exclusions: Unacceptable Behaviour**

The Code of Guidance (Allocation of Accommodation June 2012) and the Localism Act 2011 allow local authorities to adopt criteria which disqualify individuals who satisfy the reasonable preference grounds due to their poor behaviour. Herefordshire Council has retained the principles of the previous 'unacceptable behaviour' test in this regard.

An applicant will not qualify for the register for 12 months from the date of the last action/incident if the applicant or a member of his/her household has been guilty of 'unacceptable behaviour'.

Unacceptable behaviour is any breach of tenancy conditions including anti-social behaviour and non-payment of rent where a court order has been obtained by the council or any social landlord, or legal action has been taken by the police, and where the tenant has failed to adhere to the terms of the order.

This would include:

- Breach of tenancy conditions
- Criminal Behaviour Orders
- Restraining Order

- Possession Order
- Eviction
- Damage to current or former property where non-wear and tear repair costs are in excess of £1000
- Non-payment of rent.

This list is not exhaustive.

Each case will be judged on its own merits and efforts will be made to resolve any issues which prevent applicants from joining the register as denying access to social housing can result in broader social exclusion for the households involved, and have adverse effects for the community as a whole.

## **2.1 Exclusion periods and other conditions associated with behaviour**

Applicants who fail the 'acceptable behaviour' test may be excluded from registering, or remaining, on the register for 12 months unless the applicant can demonstrate they have undertaken significant remedial actions to address the behaviour.

Where possession has been granted on the grounds of anti-social behaviour, the applicant should be able to show that they are addressing the issues before qualifying for inclusion on the register. This may include undertaking programmes with support agencies to show their understanding and commitment to behaviour improvement.

Where the applicant has significant rent/former tenant arrears the applicant must make arrangement to pay the debt and maintain the arrangement from the date of its commencement for the full remaining time the applicant is excluded. This would need to be for a minimum of 13 weeks. The payment arrangement needs to continue once the applicant is made active on the register. Failure to do so is likely to adversely affect the chances of being housed.

It should be noted that an application may be placed in a reduced preference band after the exclusion 'term' of twelve months has elapsed.

## **2.2 Applicants --special circumstances**

Where Housing Register team has reason to believe that unacceptable behaviour is due to a physical, mental or learning disability, the person will not be excluded from the register without considering whether they would be able to maintain a tenancy satisfactorily with appropriate care and support.

Housing Register team will consult as appropriate with any relevant agencies, including Health and Social Services, the Medical Advisor or other medical advisors, and local providers of support services.

### **2.3 Exceptional circumstances**

This exclusion policy may be varied in exceptional cases. For example, the applicant or household's need to move on social, welfare or medical grounds is considered a sufficiently high priority to override their history of unacceptable behaviour. Consideration will also be given where the applicant or tenant has a continuing support package in place.

### **3. Reduced Preference band**

Applicants whose behaviour is not serious enough to be excluded under these provisions may be awarded a **reduced preference** when the application is assessed and also may be overlooked for offers of accommodation by the housing association.

It is not intended that a person's behaviour at one time in their life should permanently exclude them from social housing. Applicants who are placed in a reduced preference band due to anti-social behaviour or damage to property will normally only receive reduced preference if the incidents or convictions occurred within the previous 12 months. If, at the time of application, there has been no repeat of the behaviour in that time the applicant will not be given reduced preference.

Applicants should be able to show that they are addressing the issues which caused the award of a reduced preference before moving into the appropriate priority band. This may include undertaking programmes with support agencies to show their understanding and commitment to behaviour improvement.

With regards to former or current rent arrears and money owed to the local authority, if the applicant has made an arrangement to pay the debts and has maintained this arrangement for a 26 week period or the debt is £100 or less, the reduced preference will be removed as long as the payment arrangements are maintained.

#### **3.1 Applicants --special circumstances**

See paragraph 2.2 above

#### **3.2 Exceptional circumstances**

See paragraph 2.3 above

Anyone wishing to appeal should refer to Appendix E of this policy.

## **APPENDIX E: Right to review decisions on applications or offers**

All applicants have the right to ask for a review of a decision, if they consider they have been unfairly or unreasonably treated having regard to the provisions of this policy. For example, a decision about:

- exclusion or removal from the register;
- any decision taken in relation to their registration;
- information that has been taken into account when assessing the application;
- type of property the applicant is eligible for;
- the band into which they have been placed;
- instances of an application being overlooked for a nomination;
- suitability of accommodation offered to households subject to the full homeless duty.

Initial requests for reviews will be dealt with by the organisation that has been mainly dealing with that part of the application i.e. the organisation that has notified the applicant on the issue they would like reviewed.

For reviews of decisions about the register including banding, property eligibility and decisions in relation to homeless households, requests should be addressed initially to Housing Register Lead at Herefordshire Council.

An applicant can appoint an advocate and once appointed the Housing Register Lead will deal directly with the advocate. The appeal will initially be dealt with by the Housing Register Lead, who was not involved in the original decision.

There are two stages to the appeal process.

### Stage 1

The appeal must be made in writing within 21 calendar days of the date of the decision letter, stating the grounds for the appeal. The appeal will be considered and a decision will normally be given within 21 calendar days. In complex cases it may not be possible to give a decision in 21 days and it may take longer. Where this is the case the applicant/advocate will be notified in writing prior to expiry of the 21 day period.

If an applicant is unhappy with the initial review decision they should notify the relevant organisation, in writing, within 21 days of receipt of that decision, requesting a second review.

### Stage 2

If the applicant is unhappy with the decision made, they may request that a further review be carried out by the Housing Solutions and Housing Register Team Leader. This request must be made in writing within 14 calendar days of the date of the stage 1 decision. A decision will normally be given in 21 calendar days, subject to extension where necessary.

If the applicant remains unhappy with the outcome of the appeal, the applicant may make a complaint to the Local Government Ombudsman.

Contact details for the Local Government Ombudsman are listed below:

Tel: 0300 061 0614 for help making a complaint.

Lines are open Monday to Friday from 8.30am to 5.00pm (except public holidays)

Fax: 027 7682 0001

Email: [advice@lgo.org.uk](mailto:advice@lgo.org.uk)

Further information is available on the website <https://www.lgo.org.uk/contact-us>

Contact forms are available on the web page

[https://www.lgo.org.uk/forms/showForm.asp?nc=QG1E&fm\\_fid=81](https://www.lgo.org.uk/forms/showForm.asp?nc=QG1E&fm_fid=81)

For decisions regarding **offers of accommodation**, unless from an applicant owed the full homelessness duty, the Housing Manager of the relevant housing association should be contacted. See Appendix A for contact details.

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## APPENDIX F: Monitoring and review

In order to ensure that the scheme is achieving its aims of being as open and accessible as possible to all members of the community outcomes, including the following will be monitored:

- a) The number of applicants by band each quarter & by age, ethnicity and disability.
- b) The number of allocations in the financial year in each quarter:
  - By property type (and bedrooms);
  - Whether restricted (i.e. criteria used in advert);
  - Lettings by banding criteria;
  - Local connection.
- c) Property Feedback for each allocation as follows monthly:
  - Address of property,
    - Number of beds;
    - Type of property;
    - Number of bids.
  - Refusals
- d) Non bidders, customer satisfaction & performance against service standards annually.

The Housing Register team will also receive quarterly reports on the following to ensure that the scheme meets Herefordshire Council's commitment to serve all members of the community.

### Review

The data collected from the monitoring arrangements will be used in an initial review of the policy 12 months after its implementation.

Any decisions on further review timescales will be taken after the initial review.

## **APPENDIX G: Service standards**

The following outlines our intended approach in working with people who use Herefordshire Council services:

We will treat people with dignity and respect, and expect the same consideration in return.

We will respect people's privacy and confidentiality.

We will listen and respond to concerns, and act to resolve queries where we can and have the powers to do so.

We will prioritise our resources to deal with areas of high risk, specifically danger to the public and where the most vulnerable in the community may be affected.

We can provide an interpreting service for customers who do not speak English or where English is not sufficient.

We can provide information in large print, audio and Braille on request.

We will design services so that they are accessible by disabled people and ensure reasonable adjustments are made where needed.

We will evaluate our practices to make sure we are offering the best service possible next to the resources we have available.

We will always wear ID badges and identify ourselves when responding to phone calls and written correspondence.

## APPENDIX H: Complaints

### If you are not happy

We welcome positive feedback when you are happy with the service provided as it lets us know what we are doing right.

If you are unhappy, we will work with you to resolve your query or issue at a service level, and if you are not happy with the outcome we will explain why we've taken that particular course of action or find an alternative remedy.

If you are still not happy with the outcome the following routes can be taken.

### Formal complaint

A formal complaint is an expression of dissatisfaction about the standard of service, action or lack of action by Herefordshire Council, our staff or contractors.

This could be based on stated standards not being met or not what the customer thinks is reasonable:

- We are doing something the customer did not want;
- We carried out duties in an unsatisfactory way or our staff or contractors behaved in an unacceptable way;
- We failed to do something which was asked for;
- We should have taken some action;
- Generally, a complaint has to be made within 12 months from the day the matter occurred or came to the notice of the complainant.

Formal complaints to the Council will be dealt with only through the Information Access team and we will not reinvestigate the same complaint. For further information visit the Council's [make a complaint](#) page.

### Complaints about the service provided by partner housing associations

These should be dealt with through the specific housing association's Complaint Policy which is available on their websites. See Appendix A for contact details.

## GLOSSARY

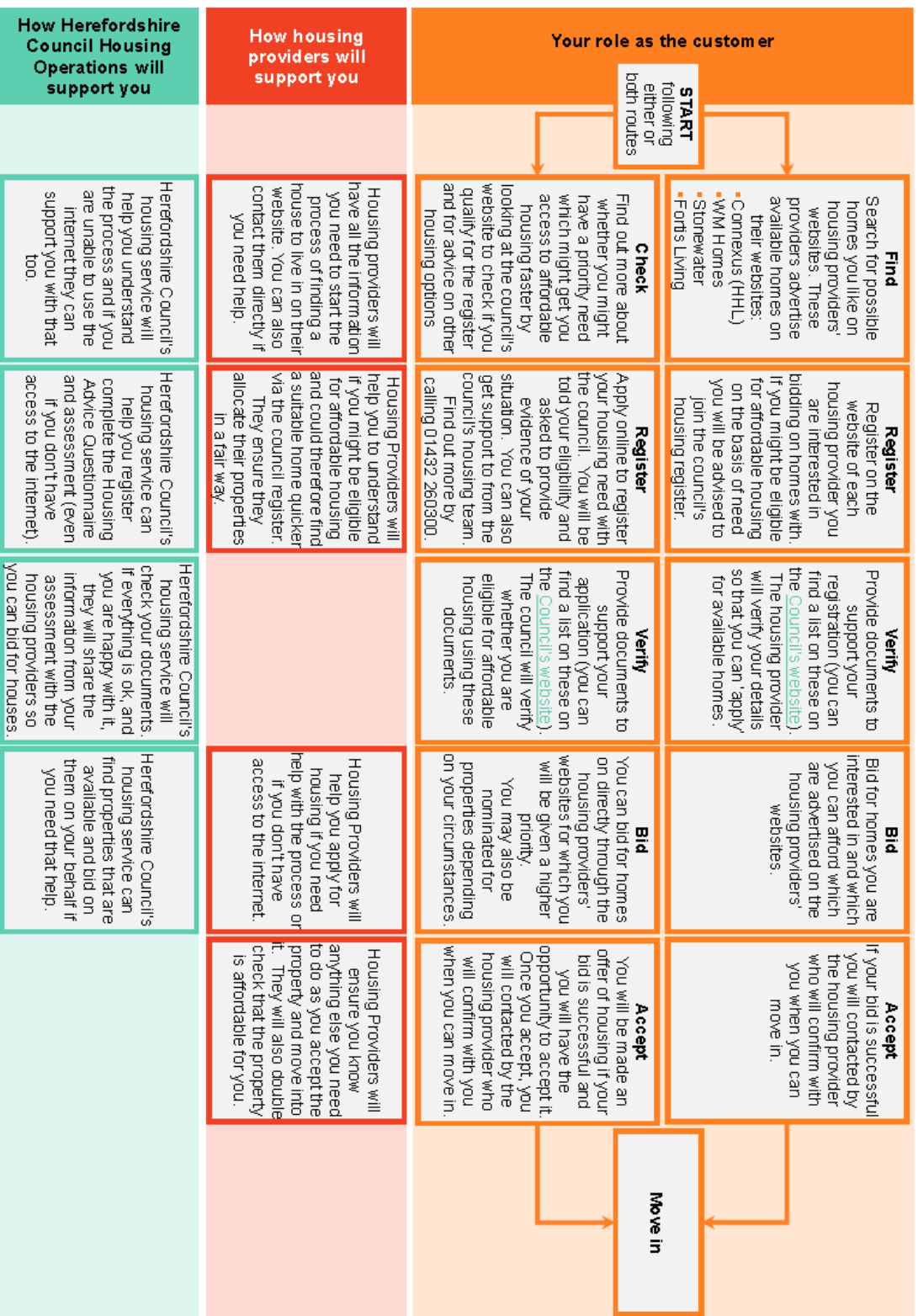
|                                 |   |
|---------------------------------|---|
| Housing Register team           | Based in the council's offices at Blueschool House, this team advises on and administers the housing register.  |
| Accessible housing              | This refers to housing which has been constructed or modified to enable independent living for persons with disabilities.   |
| Accommodation of choice         | Accommodation of choice is defined through legislation and case law in relation to homelessness decisions. It relates to establishing a local connection. If someone is living in accommodation not of their own choice then residence by virtue of simply living in an area will not count towards having a local connection. See below for definition of settled accommodation  |
| Additional preference           | Local housing authorities are able to award additional preference benefits to particular descriptions of people who fall within the statutory reasonable preference categories and have urgent housing needs.   |
| Affordable Housing              | Housing provided at below market prices and allocated on the basis of need to people who qualify for the Housing Register team in Herefordshire as their only home and/or are unable to purchase or rent properties generally available on the open market without financial assistance.  |
| Affordable rented housing       | Rented housing usually owned and managed by housing associations where the total rent charged (including service charges, where applicable) is up to 80% of the open market rent.   |
| Allocation policy               | This is the policy document which explains the rules that Herefordshire Council uses to define those who qualify to register for social and affordable rented housing, and to prioritise applications in respect of housing need.   |
| Armed Forces                    | As detailed in s.374 Armed Forces Act 2006, this means the Royal Navy, the Royal Marines, the regular Army or the Royal Air Force.  |
| Assured shorthold tenancy (AST) | <p>A tenancy can be an AST if all of the following apply:</p> <ul style="list-style-type: none"> <li>• the property you rent is not council owned</li> <li>• your tenancy started on or after 15 January 1989</li> <li>• the property is your main accommodation</li> <li>• your landlord doesn't live in the property</li> </ul> <p>It is a form of assured tenancy with limited security of tenure which can be terminated by a section 21 notice giving a minimum notice period of two months.</p> |
| Bedroom Standard                | <p>The bedroom standard is the commonly used standard to assess whether a household is overcrowded. The standard allocates a separate bedroom to each:</p> <p>Adult couple<br/>           Person over 21<br/>           2 people aged 10-20 of the same sex<br/>           1 child under 10 years and 1 young person under 20 of the same sex</p>   |

|                                 |   |
|---------------------------------|---|
|                                 | 2 children under 10 years (any or both sexes)<br>Any unpaired person aged 10-20 or unpaired child under 10  |
| Effective date                  | The date on which an applicant applies to the register or, if the application is awarded a higher banding at a later date, the date on which the higher banding was awarded.  |
| Eligibility                     | Nationally set requirements that applicants have to comply with as the first stage in the registration process.   |
| Equality Act 2010               | This act requires that 'due regard' is shown to the needs and rights of members of the community including the 'protected' characteristics, which are: <ul style="list-style-type: none"> <li>• Age</li> <li>• Disability</li> <li>• Gender</li> <li>• Gender reassignment</li> <li>• Marriage and civil partnerships</li> <li>• Pregnancy and maternity</li> <li>• Race</li> <li>• Religion or belief</li> <li>• Sexual orientation</li> </ul> |
| Extra care                      | Extra Care housing is designed with the needs of frailer older people in mind and with varying levels of care and support available on site.  |
| Full housing duty (homeless)    | A term that refers to people or families to whom a local housing authority have accepted as homeless, eligible for assistance, in priority need and not intentionally homeless, and acknowledges a duty to ensure that the household is offered settled accommodation.  |
| Homelessness Act 2002           | This Act made amendments to the Housing Act 1996 and places a duty on local authorities to review homelessness in their area.   |
| Homelessness Reduction Act 2017 | The Homelessness Reduction Act comes into force in April 2018. The Act will modify and extend existing homelessness protection.   |
| Housing Act 1996                | This Act makes provisions about housing, including the social rented sector, the conduct of tenants, the allocation of <b>housing</b> accommodation by local <b>housing</b> authorities and homelessness.   |
| Housing Act 2004                | Parts 1 and 2 introduced the Housing Health and Safety Rating System to improve standards in accommodation. The Bedroom standard (see above) was introduced as part of this system.   |
| Housing Association             | A not-for-profit landlord organisation providing a range of affordable housing. Also known as Registered Social Landlord (RSL) and, more recently, Private Registered Provider (RP) in the legislation. They are regulated by Homes England and the Regulator of Social Housing.  |

|   |   |
|---|---|
| Housing Health and Safety Rating Standard (HHSRS) | The housing health and safety rating system (HHSRS) is a risk-based evaluation tool used to identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. It includes a definition of bedroom requirements for households known as the 'bedroom standard'.                                       |
| Housing Register                                  | The Housing Register is the directory of applicants who have expressed an interest in, and qualified for, social housing in Herefordshire.  |
| HSRTL   | Housing Solutions and Register Team Lead who has authority to vary aspects of the allocation policy in exceptional circumstances, as indicated in this policy document.   |
| Local connection criteria                         | These criteria relate firstly to the county and the level of preference an applicant has for social and affordable rented housing in the county in the Allocation policy.<br><br>Local connection criteria may also refer to the terms of a section 106 planning agreement which gives priority to applicants with a defined connection to the specific parish. |
| Local lettings plan                               | Local lettings plans are agreed for the allocation and letting of properties in specific area to address particular issues in that area.  |
| Localism Act 2011                                 | The Localism Act 2011 gave flexibilities to local authorities in relation to qualification on the housing register.   |
| Looked after children                             | A child who is being looked after the local authority is known as a child in care. They might be living: with foster parents, at home with their parents under the supervision of social services, or in residential children's homes.  |
| MARAC   | Multi-Agency Risk Assessment Conference   |
| MAPPA   | Multi Agency Public Protection Panel Arrangements   |
| Mutual exchange                                   | A swap of homes by two social housing tenants moving permanently into the other tenants property. Tenants must be granted permission by both landlords.   |
| Nomination  | The term used for applicants who qualify for the register and whose name and details are provided to the landlord as part of the bidding process through Home Point.  |
| Reasonable Preference                             | The Housing Act 1996(as amended) requires local authorities to give reasonable preference in their allocation policies to applicants who fall into specified categories of housing need. See section 2.1 of this policy for a full explanation of the categories.   |
| Reduced Preference                                | The term used for applicants whose application has a lower priority than it would normally have if the applicant had either a local connection to Herefordshire or had not previously acted in a manner that was not  |

|                             |  |
|-----------------------------|--|
|                             | acceptable for a tenant living in social housing.  |
| Private Registered Provider | Private Registered provider, also known as Registered provider, is the current term for organisations that are registered with the Homes and Communities Agency to provide affordable housing.   |
| Reserved Forces             | As detailed in s374 Armed Forces Act 2006, this means the Royal Fleet Reserve, the Royal Naval Reserve, the Royal Marines Reserve, the Army Reserve, the Territorial Army, the Royal Air Force Reserve or the Royal Auxiliary Air Force.   |
| Section 106                 | This refers to s.106 Town and Country Planning Act 1990 under which developers may provide affordable housing on a specific site, with criteria which grant priority to applicants with a local connection to the parish or ward. .  |
| Settled accommodation       | Defined through legislation and case law in relation to homelessness decisions. Any accommodation that is precarious, short term or insecure is not considered settled. Examples of settled accommodation include, but are not limited to: <ul style="list-style-type: none"> <li>· Freehold or Leasehold Ownership</li> <li>· A tenancy enjoying security of tenure ( assured or assured shorthold tenancy)</li> <li>· An indefinite Licence or Permission to Occupy (Any occupation implying an indefinite time period)</li> <li>· Returning to long term occupation with parents</li> <li>· An indefinite stay with other relatives</li> <li>· Tied accommodation as a long term employee.</li> </ul> |
| Social Housing              | The term used in this policy document to mean social and affordable rented housing   |
| Social Rented housing       | Rented housing usually owned or managed by a housing association, let at below market rents, where the changes in rent levels are subject to government policy.  |
| Specialist housing          | Housing that has been specifically designed to meet the requirements of people with particular needs. It can refer to housing that has been purpose designed or designated for a particular client group to assist tenants to live independently.  |
| Supported housing           | Housing scheme where housing, support and sometimes care services are provided as an integrated package. The schemes can be long-term designed for people who need support to live independently, or short-term, designed to help people acquire the skills needed to move on into more mainstream housing.  |
| Transfer                    | This is a term used for a permanent move by an existing social housing tenant within social housing stock.   |

# New Arrangements for Housing Allocation: Customer Journey





# Equality Analysis (EIA) Form

## A) Description

**Name of service, function, policy (or other) being assessed**

Housing Allocation policy for Herefordshire

**Directorate or organisation responsible (and service, if it is a policy)**

AWB Strategic Housing

**Date of assessment**

February 2018

**Names and job titles of people carrying out the assessment**

Trea Connon, Strategic Housing Officer

**Accountable person**

Martin Samuels, Director of Adult and Wellbeing

**What are the aims or main purpose of the service, function or policy? What does it provide and how does it provide it?**

Under Part 6 of the Housing Act 1996 the council is required to have a policy to determine the priorities, and procedure to be followed in allocating housing. For a non-stock holding authority such as Herefordshire the allocation of accommodation is undertaken when nominating applicants to registered providers in the county.

The policy is based on the reasonable preference categories which are set by law and require council's to ensure that applicants in these categories are given a 'head start' in securing social housing.

The policy establishes the qualifying criteria for inclusion on the housing register and the main criteria for allocating housing. It also sets out the procedures for the policy's operation and explains the relationship between it and housing providers' own policies and practices.

The key aims of this policy are to:

- ensure consistency in the way in which applicants access affordable and social rented housing through the council's housing register
- ensure and promote equality of opportunity in accessing the council's housing register
- ensure that the housing register and nomination process is understandable and transparent to applicants
- meet the legal requirements for the allocation of social housing
- provide some choice of affordable rental homes to meet applicants needs
- support better use of existing housing stock within the county
- help to prevent homelessness and minimise the use of temporary accommodation
- contribute to the development of sustainable communities.

These aims will be delivered by:

- Operating a housing allocation policy where applicants are placed in bands according to their level of need;
- Providing support and advice for customers when they need it;
- Providing applicants with straightforward and realistic information on supply and demand and the prospect of re-housing both within the social sector and private rented accommodation;
- Ensuring that every application for the housing register is dealt with fairly and consistently, so promoting equality of opportunity;
- Facilitating mobility to meet household needs.

#### **Location or any other relevant information**

#### **List any key policies or procedures to be reviewed as part of this assessment.**

The guidance and working procedures for the housing register and allocations will need to be reviewed following approval of the policy and prior to implementation.

The policy will be reviewed after 12 months of operation to ensure that it is meeting the stated objectives.

#### **Who is intended to benefit from the service, function or policy?**

Local resident households in housing need and the wider community. Applicants in need will be given the opportunity to access social housing through nomination to vacant properties owned or managed by registered providers. It will provide some choice to applicants, although this is restricted by the limited turnover of some types of properties in some areas of the county. The definition of housing need within the allocation policy has been increased to reflect adequately the reasonable preference categories.

There are a number of specific groups who are expected to benefit from the change in policy. These include certain groups who currently do not qualify for the housing register but who are generally accepted as having a housing need, as identified in the Code of Guidance, such as those lacking or sharing facilities with non-family households.

There are some groups whose access to the register or to some priority for housing will be reduced as the local connection qualifying period has been extended to two years to reflect government guidance. This will adversely affect people moving into the county, although in some circumstances, such as fleeing domestic violence, the qualification period will be relaxed. The banding criteria have also been amended or replaced to reflect legislation, upcoming statutory changes, such as the implementation of the Homelessness Reduction Act (2017) and a small number of local priorities. These changes will not affect those in the protected characteristic groups directly though it is possible that a small number of individuals in these groups may be adversely affected.

Applicants' chance of securing social housing should be primarily dependent on their level of housing need. Generally this should not be affected by the possession of a protected characteristic, unless that characteristic is a determinant of potential housing need, as in the case of the need to move on disability grounds. The 1996 Act requires an allocation policy to give reasonable preference where there is a need to move on medical/welfare grounds and this is reflected in the policy.

#### **Who are the stakeholders? What is their interest?**

Potential social housing tenants and some existing social housing tenants. Their interest relates to access to the register and ability to bid for available social housing properties.

Registered Providers (aka Housing Associations) who own and manage the social housing

stock in Herefordshire. The Providers are required to cooperate to such an extent as is reasonable in offering accommodation to people with priority under the housing authority's allocation scheme.

Providers need to let their social housing stock efficiently and generally to those in housing need.

## B) Partnerships and Procurement

If you contract out services or work in partnership with other organisations, Herefordshire Council remains responsible for ensuring that the quality of provision/delivery meets the requirements of the Equality Act 2010, i.e.

- Eliminates unlawful discrimination, harassment and victimisation
- Advances equality of opportunity between different groups
- Fosters good relations between different groups

**What information do you give to the partner/contractor in order to ensure that they meet the requirements of the Act? What information do you monitor from the partner/contractor in order to ensure that they meet the requirements of the Act?**

Herefordshire Council expects all partners to ensure that they comply with the Equality Act 2010 and have their own Equality policies available.

The housing register team will monitor various aspects of the scheme including applicants to the register, exclusions and those who successfully bid for social housing.

**Are there any concerns at this stage that indicate the possibility of inequalities/negative impacts? For example: complaints, comments, research, and outcomes of a scrutiny review. Please describe:**

There is some concern that the procedure arising from the dissolution of the Home Point partnership and the potential complexity for new applicants may have a negative impact. The current system is already fairly complex and it is not clear that applicants understand it fully. The Allocation policy gives more detailed information about the procedures and the interplay between the council's procedures and policy and those of the providers which should act as a counterbalance to the increased routes into social housing.

Research in 2004 about Choice Based Lettings (CBL) schemes identified that barriers to the bidding system tended to relate to recent immigrants not speaking English to a high standard. This policy is likely to have a similar impact on those who do not read or speak English well as it is relatively complex to understand and will require applicants to bid for most available properties, as required under CBL schemes.

Taking a broad view of the term 'Disability' the National Evaluation (2004) suggests that CBL may impact on:

- Very elderly or infirm
- People with learning difficulties
- People with limited literacy
- People with mental health issues.

Research undertaken by the Joseph Rowntree Foundation (2012) in a northern rural local authority area found that:

- vulnerable groups were not disadvantaged by CBL
- there were disproportionately fewer older persons bidding and a high numbers of older persons requiring assistance to bid.

Application to the register and bidding for properties will largely be an online process. Generally older and disabled people may be less likely to have IT access in the home, and, in some cases, may have greater difficulty visiting public offices where IT facilities are available. Herefordshire is predominantly a rural county with 95 per cent of the land area classified as 'rural', and 53 per cent of the population live in these rural areas. This can make accessing services more difficult.

The current online application process has proved difficult for some applicants. This is largely due to the need to complete a housing options questionnaire as an integral part of the application. The questionnaire will be retained, as this provides useful individualised housing advice but it will be a standalone tool, separate from the online application.

## C) Information

### What information (monitoring or consultation data) have you got and what is it telling you?

The monitoring information that we currently have is limited. We are able to monitor for age, so that it is possible to state that there are 191 applications from people aged 65 or over out of a register currently standing at 1228. 776 applications are headed by a female and there are 1082 white British applicants.

However, other data, particularly in relation to the characteristics of successful applicants, has proven difficult to obtain. Although there are indications that the council is meeting most of its statutory duties, improvement in data collection and analysis is required to ensure that this is the case.

## D) Assessment/Analysis

### Describe your key findings (eg. negative, positive or neutral impacts - actual or potential). Also your assessment of risk.

| Strand/community | Impact   |
|------------------|--|
| Race             | The policy is considered to have a neutral impact although there may be barriers, which may have a racial or nationality dimension, relating to recent immigrants who do not speak English to a high standard.   |
| Disability       | <p>Those with disabilities where their current housing circumstances have a significant impact on their health and wellbeing will benefit from high priority under the proposed scheme.</p> <p>Information is available in different formats for those with sight impairments.</p> <p>Generally, older and disabled people may be less likely to have IT access in the home and in some cases may have greater difficulty in accessing public offices.</p> |

|   |   |
|---|---|
| Age                                       | Older social housing tenants under-occupying their properties will no longer have a high level of priority. Research in preparing the policy indicated that this group were over-represented in the successful applicants and this was likely to be having a detrimental effect on those in the reasonable preference categories.<br><br>Those in need of sheltered accommodation due to medical need will be assisted within the policy.<br>Generally, older and disabled people may be less likely to have IT access in the home and in some cases may have greater difficulty in accessing public offices. |
| Gender                                    | Married, civil partners and co-habiting couples, same sex couples, and siblings, who wish to live together, can make applications.  |
| Faith/religion                            | Further data will need to be collected to assess impact. However initially the Policy is considered to be neutral.  |
| Marriage/civil partnership                | It is not considered that that the policy will impact negatively on this group.   |
| Gender reassignment                       | Further data will need to be collected to assess impact. However initially the Policy is considered to be neutral.  |
| Sexual orientation                        | Further data will need to be collected to assess impact. However initially the Policy is considered to be neutral. Same sex couples can make joint applications.  |
| Pregnant women & women on maternity leave | Pregnant women are protected under the Homelessness legislation, which is reflected within the banding.   |

## E) Consultation

**Did you carry out any consultation?**

**Yes**

**Who was consulted?**

Registered provider partners and colleagues internally.

**Describe other research, studies or information used to assist with the assessment and your key findings.**

Piloting Choice-Based Lettings: An evaluation, ODPM 2004  
North Yorkshire Home Choice Evaluation, JRF 2014

**Do you use diversity monitoring categories?** Some currently. More will be monitored with the introduction of the new policy  
*(if No you should use this as an action as we are required by law to monitor diversity categories)*

**If yes, which categories?**

- Age
- Disability
- Gender Reassignment
- Marriage & Civil Partnership
- Pregnancy & Maternity
- Race
- Religion & Belief
- Sex
- Sexual Orientation

**What do you do with the diversity monitoring data you gather? Is this information published? And if so, where?**

Currently not collecting diversity monitoring data. This will form part of the monitoring process following introduction of the new policy and the future arrangements for allocations.

**F) Conclusions**

|    | <b>Action/objective/target OR justification</b>  | <b>Resources required</b>         | <b>Timescale</b> | <b>I/R/S/J</b> |
|----|--|-----------------------------------|------------------|----------------|
| a) | Establish effective diversity monitoring indicators and protocols                                  | Staff time, internal and partners | August 2018      | S              |
| b) | Ensure that continued support is available for groups most likely to be impacted by the use of IT. | Staff time                        | August 2018      | S              |
| c) | Review the effectiveness of the current provision of translation services through the IT system    | Staff time                        | August 2018      | S              |
| d) |  |                                   |                  |                |

**(I)** *Taking immediate effect.*

**(R)** *Recommended to Council/Directors through a Committee or other Report\*.*

**(S)** *Added to the Service Plan.*

**(J)** *To be brought to the attention of the Equality Manager.*

\*Summarise your findings in the report. Make the full assessment available for further information.

NB: Make sure your final document is suitable for publishing in the public domain.