

**MEETING OF THE BOARD**  
**10 December 2019 18:10 – 20:10**  
Harford Centre, First Floor, 115 Harford Street, E1 4FG

**AGENDA**

	<u>Type</u>	<u>Lead</u>
<b><i>Open Session</i></b>		
<b><i>Introductory items</i></b>		
1.	Apologies for Absence	For Information Chair
2.	Declarations of Interest	For Information Chair
3.	Questions from Members of the Public	For Discussion Chair
4.	Open Minutes of the Board meeting on 17 September 2019	For Decision Chair
<b><i>Items for decision and discussion</i></b>		
5.	Retro Fit Scrutiny Review	For Decision Gulam Hussain
6.	Social Media and Networking Policy	For Decision Paul Davey
7.	Outline Business Plan 2020/2025	For Decision Paul Davey
8.	Employee Welfare Policy	For Decision Beverley Greenidge
9.	CE Report	For Discussion Susmita Sen
10.	Social Housing Broadband	For Discussion David Mynors
<b><i>Closed Session</i></b>		
<b><i>Items for Decision and Information</i></b>		
11.	Confidential Minutes of the Board meeting on 17 September 2019	For Decision Chair
12.	Final Accounts	For Decision Neil Isaac



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|-----|---|--------------------|--------------|
| 13. | New Build Update                                | For<br>Information | Will Manning |
| 14. | Employment Tribunal Judgement                   | For<br>Discussion  | Paul Davey   |
| 15. | Statutory Compliance                            | For<br>Information | Will Manning |
| 16. | Maltings and Brewster Update<br>(Verbal Update) | For<br>Discussion  | Will Manning |
| 17. | Forward Plan                                    | For<br>Discussion  | Chair        |

***Items for information and limited discussion***

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|-----|--------------------|-------------------|-------|
| 18. | Any Other Business | For<br>Discussion | Chair |
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**Date of next meeting – Board Discussion**

Tuesday 21 January 2019, 4 – 6pm

## **TOWER HAMLETS HOMES**

### **NOTE BY CHIEF EXECUTIVE**

#### **DECLARATIONS OF INTEREST**

Where Members of the Board have an interest in any business of the Board, then she/he must disclose this interest.

Members must disclose the existence and the nature of the interest at the start of the meeting and certainly no later than the commencement of the item when the interest becomes apparent.

#### **Personal Interests**

A Board Member must regard themselves as having a personal interest in any matter if the matter relates to an interest in respect of which notification must be given, or if a decision upon the matter might reasonably be regarded as affecting, to a greater extent than other tenants or inhabitants of the Tower Hamlets Homes area, the wellbeing or financial position of themselves, a relative or a friend, OR

- a) Any employment or business carried out by such persons;
- b) Any person who employs or appointed such persons, any firm in which they are a partner, or any company of which they are a director;
- c) Any corporate body in which such persons have a beneficial interest in a class of securities exceeding a nominal value of more than 2% of the issued share capital in a company;
- d) Anybody listed in sub-paragraphs (a) to (e) of paragraph 14 of the Resource Pack in which such persons hold a position of general control or management.

#### **Prejudicial Interests**

1. Subject to the provisions of paragraph 2 below, a Board member with a personal interest in a matter also has a prejudicial interest in that matter if the interest is one which a tenant of Tower Hamlets Council as covered by the Management Agreement or a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice the Board member's judgement of the public interest.
2. A Board member may regard themselves as not having a prejudicial interest in a matter if that matter relates to –

- a) Another relevant organisation of which they are a member;
- b) Another public organisation in which they hold a position of general control or management;
- c) A body to which they have been appointed or nominated by Tower Hamlets Homes as its representative;
- d) Where a Board member holds a tenancy or lease with a relevant organisation, provided that they do not have arrears of rent with that relevant organisation of more than two months, and provided that those functions do not relate particularly to the Board member's tenancy or lease.

**Participation in Relation to the Disclosure of Interests**

A Board member with a prejudicial interest in any matter must –

- a) Withdraw from the room where a meeting is being held whenever it becomes apparent the matter is being considered at that meeting, unless she/he has obtained a dispensation from the Board's Chairman or Company Secretary; and
- b) Not seek improperly to influence a decision about that matter.

Should you require any further information, please contact Paul Davey, Director of Business Transformation, telephone: 020 7364 7328, paul.davey@thh.org.uk

Open minutes of Tower Hamlets Homes Board Meeting  
 Tuesday 17<sup>th</sup> September 2019 **6.10pm to 7:05pm**  
 Room Spices, Harford Street, E1 4FG

**Board Members Present:**

- Ann Lucas (AL) - Chair, Independent Board Member
- Claire Tuffin (CT) - Resident Board Member
- Andrew Bond (AB) - Independent Board Member
- Helen Charles (HC) - Resident Board Member
- Asma Islam (AI) - Cllr Board Member
- Sabina Akhtar (SA) - Cllr Board Member
- Tarik Khan (TK) - Cllr Board Member
- John Pierce (JP) - Cllr Board Member

**Co – Optees Present:**

- Mahbub Anam (MA) - Co-Optee to Finance & Audit Committee
- Pam Haluwa (PH) - Co-Optee to Gov.& Remuneration Committee
- Iain Lawson (IL) - Co-Optee to Finance & Audit Committee

**Officers Present:**

- Susmita Sen (SS) - Chief Executive
- Paul Davey (PD) - Director of Business Transformation
- Ann Otesanya (AO) - Director of Neighbourhoods
- Neil Isaac (NI) - Interim Director of Finance
- Will Manning (WM) - Director of Asset Management
- Chris Smith (CS) - Head of Resources
- Sameena Raouf (SR) - Governance Officer

**In Attendance:**

- Mark Baigent (MB) - LBTH Interim Divisional Director of Strategy, Regeneration & Sustainability
- Jake Boomhauer (JB) - HND Mentee (Observing)
- Nikki Olomo (NO) - THH volunteer (Observing)

**Apologies:**

- Safia Jama (SJam) - Independent Board Member

<b>1</b>	<b>Welcome</b>	
1.1	AL welcomed all to the meeting and introduced JB her HDN mentee who is also a resident Board Member for Orbit. NO was introduced as a THH volunteer and also an observer. It was noted it was MB's final attendance to a THH Board meeting as he would be leaving LBTH at the end of the month. Apologies for absence were noted for the above.	
<b>2</b>	<b>Declaration of Interest</b>	
	CT, HC, PH and IL declared their interest as leaseholders of Tower Hamlets Homes.	
<b>3.</b>	<b>Question from Members of the Public</b>	
	None received	
<b>4.</b>	<b>Open Minutes of the meeting of the Board on 25 July 2019</b>	
4.1	With reference to 6.9 of the minutes regarding the Maltings and Brewster update, it was noted the minutes did not reflect the Boards concerns with a five year payment plan for Maltings and Brewster leaseholders.	



4.2	<i>THH Board <b>AGREED</b> the minutes of the meeting of the Board on 25<sup>th</sup> July 2019.</i>	
<b>5.</b>	<b>THH Anti-Fraud Strategy</b>	
5.1	NI presented this item to the Board. The report proposed the adoption of the draft Anti-Fraud and Anti-Bribery Policy. These policies have been developed from the Council's existing policy and amended to reflect the structure of THH and our operating arrangements.	
5.2	With reference to 5.4 of the report regarding involving resident representation, it was noted we will have to think of a way to get this message out making it clear that it is more for protection rather than because we have suspicion.	
5.3	<b>ACTION: On CT's request, the whistleblowing procedure to be circulated to Board.</b>	PD/SR
5.4	<b>ACTION: With reference to 4.3 of the Anti-Fraud and Corruption Strategy which states if complaints are received in relation to the conduct of Board Members, these will be considered by the Standards and Ethics Committee, it was noted that this needs to be explicit that the LBTH fraud team do this.</b>	SPh
5.5	<b>ACTION: With reference to 7.2.3 of the Anti-Fraud &amp; Corruption Strategy, under bullet 8, it needs to specify that an LBTH Director was also consulted.</b>	SPh
5.6	In response to AB's query regarding a recent legislation on tax evasion, NI responded that he will be attending a meeting on IR35 the following day and would report back to Board.	
5.7	<b>ACTION: IR35 to be put on the Finance and Audit Committee forward plan.</b>	NI/SR
5.8	<i>Board <b>AGREED</b> the THH Anti-Fraud Strategy subject to the amendments they suggested.</i>	
<b>6.</b>	<b>Digital Strategy Progress Report</b>	
6.1	CS presented this item to the Board. The report summarised the current status of the Digital Strategy projects and the impact they have had. It was noted we are currently in the third and final year of the Digital Solutions budget.	
6.2	It was noted there are 5000 registered users for MyTHH and that this has resulted in a significant reduction in calls. It was noted although mobile working has taken a lot of effort, the feedback from staff has been very positive.	
6.3	In response to AB's query whether there will be an evaluation on cost value savings, CS responded that there would be.	
6.4	PD added that during budget discussions in April, there will be some negotiating and reduction in costs and that we wanted to improve services but still make savings. We would expect some return on the investments we have made.	
6.5	It was noted the IT improvements in Rents had significantly improved the in-year arrears position in 2017-18. The arrears trend reduced by £240k between the end of December 2017 and the end of January 2018 with further over the remainder of the 2017-18 financial year. It was noted it was important to capture the impact on the HRA.	
6.5	IL added that it would be helpful to have a consultation with residents to find out how to make improvements to MyTHH and that it is important to get input from users of their needs. PD responded that he is meeting TRA colleagues the following day and that they will be looking at how to make improvements. They would also discuss applying for parking permits online and this will be helpful for users.	
6.6	<b>ACTION: Report on MyTHH to be taken to the Residents Panel next week as there are high users in this group.</b>	PD
6.7	JP suggested there should be promotion of when and where estate inspections are to encourage residents to attend them and engage with us better. He also added that in regards to ASB, residents are given timesheets to record incidents and that perhaps there could be a digital solution for this. PD advised that there is a noise	

5

6.8	nuisance app that residents can use to record noise which was being looked into. HC commented that there are potential benefits of sending texts to residents; however the Organisation is not actively seeking more information from them. The percentage of email addresses we have is low.	
6.9	IL added that residents' use 101 to report ASB as it this gets a quicker response. PH clarified that 101 have a triage function where they can contact the relevant agencies on the residents' behalf.	
6.10	It was noted a report will go to the Customer Experience Task Force with more details on estate inspections. It was noted NHO's are still getting used to the mobile sets and that currently there are no issues managerially with regards to estate inspections not being completed.	
6.11	<i>THH Board <b>NOTED</b> the progress of the Digital Strategy Programme.</i>	
<b>7.</b>	<b>CE Report</b>	
7.1	SS presented this item to the Board. The report provided the Board with a performance report up to the end of July 2018 along with a summary on a new training programme for staff, a Business Plan 2020 update and a short briefing on the recent THH Jobs Fair.	
7.2	In response to MA's query regarding the CIH visit to THH offices, AO responded that it went well and that they spoke to us regarding some of the changes regarding ASB. They also followed it up with some case studies.	
7.3	A discussion was had around Social Housing Broadband. Central Government has set a target for half of UK homes to have a fibre-optic broadband connection by 2025 and all properties connected by 2033. There are new obligations for landowners to grant access to their properties for this purpose.	
7.4	THH and the Council are taking advantage of the legislation to deliver gigabit capable connections to the THH stock. Providers will adhere to a standardised wayleave that determines how they deliver their services to the THH housing stock, including leasehold properties.	
7.5	Three providers have expressed an interest and three pilot schemes have been discussed – Community Fibre, HyperOptic and Virgin Media. It was noted it will not cost THH anything and residents are not obligated to take it up, costs will also be very low.	
7.6	JP questioned how we will mitigate risks in the event the company collapses, we are giving them access rights so what would happen?	
7.7	<b>ACTION: A comprehensive paper on Social Housing Broadband to come back to Board.</b>	<b>PD/DM</b>
7.8	In regards to the sublet project, IL advised that the form was challenging to complete and queried whether there is a simpler form leaseholders can complete? He added there was no link for the sublet pack. He noted it was important this goes ahead but it was not easy to complete.	
7.9	<b>ACTION: IL to sit with Muman Ali (Business Insight Analyst) with his suggestions.</b>	<b>IL/MA</b>
7.10	<b>ACTION: Compliance training to come to Board with details of how many attending.</b>	<b>WM</b>
7.11	It was noted Equality and Diversity training was also compulsory for Board Directors.	
7.12	<i>THH Board <b>NOTED</b> the CE Report.</i>	

5

**Actions Log: Open minutes of THH board  
17 September 2019 6.10pm – 7.05pm**

Item	Action	Who	Due	Status
5.3	On CT's request, the whistleblowing procedure to be circulated to Board.	Sph		Completed
5.4	With reference to 7.2.3 of the Anti-Fraud & Corruption Policy, under bullet 8, it needs to specify that an LBTH Director was also consulted.	Sph		Completed
5.5	IR35 to be put on the Finance and Audit Committee forward plan.	SR		Completed
6.6	Report on MyTHH to be taken to the Residents Panel next week as there are high users in this group.	PD		Completed
7.7	A comprehensive paper on Social Housing Broadband to come back to Board.	PD/DM		Completed
7.9	IL to sit with Muman Ali (Business Insight Analyst) with his suggestions.	IL/MA		Completed
7.10	Compliance training to come to Board with details of how many attending.	WM		

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**Chair**

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**Date**







# Whistleblowing

## September-October 2019

5.1

### 1. Policy objectives

1.1 Tower Hamlets Homes (THH) is committed to the highest standard of quality, probity, openness and accountability. As part of that commitment, it is important to THH that any fraud, misconduct or wrongdoing by workers is reported and properly dealt with.

1.2 Therefore, THH has introduced this policy to reassure workers that it is safe and acceptable to speak up and to enable them to raise any concerns they may have at an early stage and in the right way. Rather than wait for proof, THH would prefer workers to raise matters when they are still a concern.

1.3 This policy sets out the way in which individuals may raise genuine concerns about negligence, health and safety, financial impropriety, bribery, criminal offences or any other serious risks and be protected from victimisation or recrimination for doing so, and how any concerns raised will be dealt with.

1.4 THH will take all concerns seriously and is committed to developing a climate of openness and free expression where raising concerns is welcomed, appreciated and acted upon positively.

### 2. Scope and definitions

2.1 This policy applies to all employees, trainees, volunteers, contractors and agency workers within THH. Other individuals performing functions in relation to THH, such as contractors, are encouraged and able to use it.

2.2 There are various definitions that apply to this policy are:

- Whistleblowing – Whistleblowing/Raising a concern is 'Making a Protected Disclosure in the public interest'. Individuals that have a 'reasonable belief' that something is wrong or dangerous is happening at work, should not keep it to themselves. Unless individuals tell THH about any concerns they may have about fraud, safety risks, or other wrongdoing, the chances are that THH will not find out until it's too late.
- Bribery – Something, such as money or a favour, offered or given to a person in a position of trust to influence that person's views or conduct.
- Fraud – A deception deliberately practiced in order to secure unfair or unlawful gain.
- Corruption – Inducement to do wrong by improper or unlawful means.
- Negligent – Failing to take proper care over something.
- Maliciously – Deliberately harmful.
- Misconduct – Unacceptable or improper behaviour, especially by an employee or professional person.

### 3. Status

3.1 This is a THH employment procedure. Its provisions do not form part of the contract of employment and we reserve the right to vary or withdraw them unilaterally following consultation via the Trade Union Forum.

### 4. Background

4.1 The law provides protection for workers who raise legitimate concerns about specified matters. A Protected Disclosure is one made in the public interest by a worker who has a reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealment of any of the above;

is being, has been, or is likely to be, committed.

4.2 It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. The worker has no responsibility for investigating the matter; it is THH's responsibility to ensure that an investigation takes place.

4.3 The legislation protecting individuals who make a Protected Disclosure applies not only to employees but also to any person who undertakes to do or perform personally (or otherwise) any work or service for THH, regardless of the nature of the contractual relationship between them.

4.4 A worker who makes such a Protected Disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

4.5 Workers registered with a professional body may have professional duties to raise concerns.

### 5. Principles and assurances to whistle-blowers

5.1 Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Workers should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of. All workers have a responsibility to work within our values which includes integrity.

5.2 Usually, concerns we may have about what is happening at work are easily resolved. However, when the concern feels serious because it is about a possible danger, professional misconduct or financial malpractice that might affect residents, colleagues or THH itself, it can be difficult to know what to do.

5.3 Workers may be worried about raising an issue and may think it's best to keep it to themselves, perhaps feeling it is none of their business or that it is only a suspicion. Individuals may feel that raising the matter would be disloyal to colleagues, to managers or the organisation. Individuals may have said something but found that they have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

5.4 Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the worker who raised the issue. The whistle-blower's identity will, so far as is possible, be kept confidential.

5.5 No worker raising a genuine concern under this policy will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because they have raised a concern provide that at the time of raising it they had a "reasonable belief that their disclosure is in the public interest". In such cases, it will not matter if the worker is mistaken; any worker who, in good faith, makes allegations that turn out to be unfounded will not be penalised for being genuinely mistaken. Victimisation of a worker for raising a genuine Protected Disclosure is a disciplinary offence.

5.6 If an allegation/suspicion of misconduct arises during or as a result of any investigation under this procedure, the THH ~~Conduct~~-Disciplinary Policy will be used to investigate that, in addition to any appropriate external measures. It should be investigated separately from the Whistleblowing claim, the investigation of which should continue.

5.7 THH will take all concerns seriously and is committed to developing a climate where raising concerns is welcomed. However, maliciously making a false allegation or raising a matter they know to be untrue is a disciplinary offence; if an investigation under this procedure concludes that a disclosure is malicious, vexatious, in bad faith or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

5.8 An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, workers should not agree to remain silent. They should report the matter to a member of the THH Executive Management Team (EMT). If it relates to a member of EMT then this should be raised with the Chair of the Board.

5.9 This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that his/her own contract has been, or is likely to be, broken, they should use the THH Grievance Policy. Concerns about bullying or harassment should be raised in line with the THH Equality and Diversity in Employment Policy. The Whistleblowing Policy should only be used when these are not appropriate.

5.10 The Whistleblowing Policy should not be used as a way of protesting against legitimate activities or policies of THH of which someone might disapprove but is for where they have become aware of a serious problem which requires investigation and if necessary correction. This should be seen as a last resort where other procedures are not appropriate.

5.11 Those choosing to make disclosures without following this policy or anonymously may not receive the protection outlined above. However, it is recognised that a member of staff may wish to raise their concern in confidence, with good reason. If a member of staff asks for their identity to be protected, it will not be disclosed without their consent. If the situation arises where a concern cannot be resolved without revealing an identity (for instance because evidence is needed in court), this will first be discussed with the person raising the concern, in order to decide whether and how to proceed.

5.12 This assurance of confidentiality should avoid the need to raise concerns anonymously. Without an identity, it can be difficult to look into a cause for concern, to protect someone's position or to provide feedback. Accordingly, while anonymous reports will not be ignored, it may not be possible to follow the procedure and investigate the

concern fully in some cases where concerns are raised anonymously. If the whistle-blower prefers to remain anonymous they may prefer to raise their concern using one of the alternative methods detailed in 10.4 below.

## 6. Procedure

6.1 In the first instance, and unless the Whistle-blower reasonably believes their line manager to be involved in the wrongdoing, or if for any other reason the Whistle-blower does not wish to approach their line manager, any concerns should be raised with the Whistle-blower's line manager. This can be done orally or in writing.

6.2 Whistle-blowers that are unable to raise the matter with their line manager (for example, they feel that their line manager is involved in the issue that they are concerned about) should raise the matter with a member of the THH Senior Management Team (e.g. a Director or Head of Service, which does not have to be their own Director or Head of Service).

6.3 The line manager (or Senior Manager if raised with them initially) will first assess the Disclosure to determine what action should be taken. This assessment should consider:

- Whether the issue is being raised in confidence. If so, the Whistle-blower should be aware that a situation may arise in which their concern cannot be resolved without revealing their identity. In such instances, the best way to proceed will be discussed with the Whistle-blower raising the concern.
- Whether the Whistle-blower has discussed their concern with any other person, both internally and externally.
- Whether the Whistle-blower has a personal interest in the matter (in which case consideration should be given as to whether the issue falls more properly within another Policy, as per 5.9 above).
- How the Whistle-blower feels the matter ought to be resolved.

Where, after considering the above, it is felt appropriate, the manager may arrange an investigation into the matter (either by investigating the matter themselves, immediately passing the issue to someone in a more senior position, or, where appropriate, passing the investigation to the Internal Audit team to investigate independently). The investigation may involve the Whistle-blower and other individuals involved giving written statements. Any investigation will be carried out in accordance with the principles set out above. The Whistle-blower's statement will be taken into account, and they will be asked to comment on any additional evidence obtained. The line manager (or the person who carried out the investigation) will then report to EMT unless an EMT member is involved in the case, in which case the matter will be reported to the Chief Executive. If the Chief Executive is involved, the matter will be reported to the Chair of the Board who may report the matter to LBTH and/or to any appropriate government department or regulatory agency.

6.4 If disciplinary action is required, the line manager (or the person who carried out the investigation) will report the matter to People Services, who will initiate the [Conduct Disciplinary](#) Policy.

6.5 For matters that are extremely serious or involving criminal activity, the Police may become involved and any internal investigation undertaken by THH or LBTH would be compliant with their instructions.

6.6 While the purpose of this procedure is to enable THH to investigate possible Fraud, malpractice or negligence and to take appropriate steps to deal with it, Whistle-blowers who have raised concerns will be given as much feedback as can be given. If requested, this will be in writing. However, in some instances it may be inappropriate to detail the precise action being taken, e.g. where this would infringe a duty of confidence owed to someone else.

6.7 If the Whistle-blower is concerned that the process above has not been followed, they should inform the Chief Executive, who will make any necessary enquiries and make his/her own report to EMT as in 6.3 above. In such circumstances, if the worker is concerned that the Chief Executive is involved in the wrongdoing, they should raise the matter with the Chair of the Board.

6.8 If on conclusion of 6.7 above, or indeed at any point during the process, the Whistle-blower reasonably believes that the appropriate action has not been taken, they should report the matter to the LBTH Whistleblowing confidential hotline on 0800 528 0294.

6.9 While it is hoped that this procedure provides the reassurance workers need to raise such matters internally, it is recognised that there may be circumstances in which workers would prefer to raise concerns with outside bodies, such as professional regulatory bodies. The legislation sets out a number of bodies to which Protected Disclosures may be made. These include:

- Homes and Communities Agency;
- HM Revenue and Customs;
- the Financial Conduct Authority;
- the Competition and Markets Authority;
- the Health and Safety Executive;
- the Environment Agency;
- the Independent Police Complaints Commission; and
- the Serious Fraud Office.

It is recommended that any worker considering this option contact Public Concern at Work or, if applicable, a professional association or union in the first instance, who will be able to advise on such an option and on the circumstances in which an outside body can be contacted.

6.10 Workers should note that going directly to the media or posting concerns onto the internet would be inappropriate in all but the most serious cases of wrongdoing.

6.11 Assuming they are not involved, the Company Secretary will notify the Board, as appropriate, of the Disclosure, investigation and outcomes. If the Company Secretary is involved in the Disclosure, this task will pass to the Chief Executive or, if the Chief Executive is involved, the Chair of the Board.

## 7. Frequently asked questions

### 7.1 What is the difference between a grievance and a protected disclosure?

A grievance will concern an employee personally, i.e. the individual may have a complaint about:

- his or her pay or working hours;
- the amount of work that he or she is expected to do;
- working conditions; or being bullied by fellow workers.

A Protected Disclosure, on the other hand, will concern the conduct of another person in the workplace (whether or not that conduct affects the complainant personally), in circumstances where the complainant genuinely believes that the conduct in question amounts to a criminal offence, a breach of a legal obligation, or something likely to endanger health or safety or damage the environment. A whistleblowing concern is where an individual raises information as a witness, whereas a grievance is where the individual is a complainant. For example:

Grievance	Protected Disclosure
An employee's complaint about the type of work that he or she is being asked to do, for example if it is not covered by his or her contract	A disclosure that an individual has been instructed to carry out actions that he or she genuinely believes to be illegal
An employee's complaint that he or she has received insufficient safety training	A disclosure that safety rules within the workplace are routinely being flouted, thus endangering safety
An employee's complaint about the hours that he or she is expected to work	A disclosure that the requirements imposed by the company on a group of staff represent a breach of working time legislation

Other examples of Protected Disclosures may include:

- Misuse of IT equipment and systems;
- Theft of THH property;
- Misuse/Misrepresentation of the THH information, finances or other assets;
- Financial, corruption, bribery or blackmail;
- Failure to comply with legal obligations or statutes;
- Criminal activity;
- Improper conduct or unethical behaviour;
- Safeguarding;
- Miscarriage of justice;
- Endangers the health and safety of individuals;
- Endangers the health and safety of the environment;
- Attempts to conceal any of the above.

This policy complements other THH policies already in place, including the Grievance policy and Equality and Diversity in Employment policy. The general principles as to which procedure to use in which circumstances are, as follows:

- If the issue causing concern relates to a management decision or conditions of service which affect the member of staff personally, it is probably more appropriate to raise it as a grievance under the THH Grievance policy.
- If the issue relates to bullying, victimisation or harassment of staff, the matter should be managed under the THH Equality and Diversity in Employment policy.
- If the issue relates to concerns where the interests of others or of the organisation itself are at risk, the Whistleblowing policy should be followed.
- If the issue relates to suspected fraud, matters must be reported as detailed in Appendix 1.

**7.2 Do I need to raise my concern in writing?**

No, although this will help any investigation and so THH provides a form for this purpose.

Workers should note that if they discuss a matter informally with their line manager or with People Services, there may be an obligation upon the manager/People Services to act if



they believe that the report should be dealt with under the Whistleblowing policy. They may make a record of: the date on which the concern was raised; the part of the organisation to which the concern relates; the nature of the concern and its key elements; any action that THH has taken; any feedback that has been provided to the discloser; and whether or not the discloser has any wishes with regards to confidentiality.

7.3 Will I remain anonymous if I raise a concern?

THH will maintain confidentiality where possible, but this cannot be guaranteed in all cases; for instance, in some cases we may have to report a criminal offence to a third party. However, we recognise that some individuals may fear reprisals, and so we are clear that it is a disciplinary offence for anyone to victimise someone because they have made a Protected Disclosure.

Workers may raise a Protected Disclosure anonymously. In such cases, THH will seek to investigate the concern raised, but clearly we will be unable to ask the individual raising the concern for further details, or provide clarification to them. For this reason, we encourage staff to raise their concerns openly – although doing so anonymously is still preferable to remaining silent.

7.4 Is any independent advice and support available to help me decide whether to make a Protected Disclosure?

THH encourages workers to raise their concerns under this policy in the first instance. If a worker is not sure whether or not to raise a concern, or if they want independent advice at any stage, they may contact:

- The THH People Services team on 0207 364 3994 or via HR@thh.org.uk.
- The THH Joint Trade Union Convenor.
- The LBTH Social Housing Fraud Investigation team on 0800 528 0294 or via email Socialhousingfraud@towerhamlets.gov.uk. They deal with allegations of sublet properties and Right to Buy issues.
- The LBTH Social Services complaints unit on 0207 364 2143.
- The independent whistleblowing charity Protect on 020 3117 2520 or via <https://protect-advice.org.uk>. Protect provide free confidential advice at any stage about how to raise a concern about malpractice or wrongdoing at work.

**8. Monitoring, review and impact assessment**

8.1 People Services will review this policy on a regular basis to ensure it remains compliant with any employment legislation revisions and good employment practice. The Trade Union Forum will be fully consulted regarding any proposed changes.

8.2 The procedure has been subject to an impact assessment and no specific impact was identified in respect of any protected characteristic.

8.3 ~~In line with 6.11 above, the~~ **The Company Secretary shall monitor the use of this procedure and will report instances of whistleblowing and outcomes to the results reported to EMT and the Board as appropriate.**

Further Information can be obtained from People Services.  
**Person responsible (“Whistle-blower’s Champion”):** Chief Executive

## Appendix 1 – Fraud

The type of misconduct which could be regarded as fraud includes, but is not limited to, the following:

- Deliberate failure to comply with THH's procedures when submitting expense claims;
- Falsification of a claim for expenses or allowances, time sheets, travel claims or other similar documents;
- Deliberate failure to disclose relevant criminal prosecutions/convictions;
- Falsification of qualifications to gain employment and/or promotion;
- Undertaking private business or other work during paid work time. This includes any time during the period of time in which an employee has self-certified as unfit for work or a GP has advised that a member of staff is unfit for work due to sickness;
- Corruption or Bribery i.e. the offering, giving, soliciting or acceptance of inducements which may influence the actions of others.

### Reporting suspected fraud

All suspicions of fraud or corruption against THH must be referred directly (not via your line manager) to any of THH Directors or Heads of Service or the LBTH Corporate Anti-Fraud team. All information received is treated in the strictest confidence. When an individual is raising a concern or reporting a fraud, they should provide as much detail/information as possible, such as names, dates, places etc. to enable the investigator to look into the issues more accurately.

Once a referral has been received it will be registered with the Council's Monitoring Officer. The information provided is reviewed, then referred to the relevant service for action (as not all cases will be suitable for Fraud investigation and may require a different team to deal with it).

In most instances of alleged fraud, the referral will be dealt with by the Corporate Fraud Team. Once received the intelligence section will register the case on the system and carry out initial checks as far as possible to evaluate the information given on the referral.

If the case is determined suitable for investigation, it will be allocated to an investigator. A more detailed investigation is then undertaken to gather information and evidence, this may involve carrying out informal and formal interviews. The Whistle-blower may be contacted by either by the intelligence officer or the investigator for further information (assuming the Whistle-blower has given their details).

The Corporate Anti-Fraud team deal with all sorts of cases and each case can take a different path. The team work alongside the Audit service depending on the nature of the enquiry and the Legal service if advice is needed or if a case is deemed suitable for prosecution. In serious matters the Police will be contacted. Some outcomes may involve disciplinary action being taken, in which case the case will be referred to THH People Services.

LBTH aim to complete investigations within 40 days or sooner; however depending on the complexity of the case, it can take longer.

Once the investigation is completed, feedback will be given to the referrer; however due to the sensitive nature of the case, the feedback provided may be limited.





# Gifts and Hospitality

## September-October 2019

5.2

### 1. Policy objectives

1.1 Tower Hamlets Homes (THH) is committed to the highest standard of quality, probity, openness and accountability. As part of that commitment, it is important to THH that no employee, Board member (including co-optees) acts, or is seen to act, in any way that is inconsistent with THH's objectives or with the integrity of THH by accepting a gift in circumstances where it could influence, or be seen to influence, that individual's business actions or decisions.

1.2 This policy sets out the way in which individuals should deal with any offers of gifts or hospitality which they receive as a result of their role within THH.

### 2. Scope

2.1 This policy and procedure will apply to all employees and Board members (including co-optees) of THH, including fixed term, temporary, and seconded staff. Other individuals performing functions in relation to the organisation, such as agency workers and contractors, are encouraged to use it.

### 3. Status

3.1 This is a THH Corporate Governance policy. Its provisions do not form part of the contract of employment and we reserve the right to vary or withdraw them unilaterally.

### 4. Principles

4.1 The general principle is that gifts of over £15.00 in value should not be accepted unless it is not practicable to return it (i.e. it is perishable and/or trivial in nature). Hospitality of a value of over £15.00 should only be accepted where this will benefit THH. All individuals must follow this procedure before accepting any hospitality or gift.

4.2 Before acceptance of a gift or hospitality, an individual should consider the potential impact on a member of the public if that acceptance was published, i.e. whether a member of the public would consider whether the acceptance of the gift or hospitality reasonable if it was published.

4.3 Those employees who work in certain activities, such as procurement, are held to a higher standard and must refuse all offers over a value of £15.00 at all times.

4.4 Any breach of the policy will be regarded as potential gross misconduct, leading to disciplinary action up to and including summary dismissal.

4.5 The Bribery Act 2010 makes it a criminal offence for THH or its employees to:

- offer, promise or give a bribe

- request, agree to receive, or accept a bribe
- bribe a foreign public official
- fail to prevent bribery

The Police will be notified of any breaches of this legislation. Employees are reminded that individuals found guilty of bribery may be fined and/or imprisoned for up to 12 months.

## 5. Gifts

5.1 A gift is a tangible item of value, for example, money, vouchers, entertainment hospitality, travel, and property that one person presents to another. Gifts may be either offered as an expression of gratitude with no obligation to repay, or given to create a feeling of obligation. Less tangible benefits can also be considered gifts where they would be of value to the recipient. such as a new job or promotion, preferential treatment or access to confidential information.

5.2 In general, THH does not believe that it is appropriate for employees and Board members (including co-optees) to accept gifts with a value of over £15.00 from customers, suppliers or any other person or organisation with which THH has (or might have) business connections.

5.3 Where a gift cannot be returned or is of a trivial nature (e.g. pens, calendars, diaries etc.) they should be declared to their line manager. Caution should be taken when using any branded items in front of the public, as it may be seen as an endorsement.

5.4 In the case of gifts such as shopping vouchers, bottles of alcohol, books or boxes of chocolates, these may be accepted with prior authorisation by the employee's line manager if the value is ~~minimal~~under £15.00, returning them may cause embarrassment to the donor, and acceptance would not potentially prejudice THH. The individual receiving the gift should complete a declaration form which details the nature of the gift, the name of its donor, and an explanation of why it was accepted, and this must be sent to the Governance Officer. Unless the gift is quickly perishable (such as flowers), the gift should be declared to the line manager and passed to the Governance Officer for registration and raffling for charity. Such perishable items, once registered, should be displayed in the office/shared amongst THH colleagues.

5.5 Accepted gifts (~~including~~and the names of those sending gifts, who accepted them, and of raffle winners) will be reported to the Board by the Company Secretary on a regular basis. ~~The individual receiving the gift should inform their line manager and Governance Officer of the nature of the gift, the name of its donor, and an explanation of why it was accepted. If the gift is quickly perishable, such as flowers, they should be registered with the line manager and Governance Officer and displayed in the office/shared amongst THH colleagues.~~

5.5 Gifts of a more substantial value should, following declaration to the line manager and Governance Officer, be refused and returned to the donor, with a polite letter explaining THH's policy. If, in the opinion of the line manager or Governance Officer, the gift might constitute a bribe or other inducement, the individual will be asked to pass the gift to a member of THH's Senior Management Team, who will return it to the sender with a suitable letter explaining THH's policy and asking that it be respected in the future.

5.6 Gifts of cash must never be accepted.

## 6. Hospitality

6.1 Hospitalities include drinks, meals, entertainment, sporting events, overnight accommodation, travel and holidays. They are offered to employees by corporate or public organisations, not by individuals.

#### 6.2 Hospitality offered to you by others

Individuals may only accept offers of hospitality if there is a genuine need to exchange information or represent THH in the community. Offers to attend purely social or sporting functions should be accepted only when they are part of the life of the community or where it is in the interests of the functions of THH to accept it.

6.3 All minor hospitality with a value clearly below £15.00 need not be declared. Any hospitality over that sum must be declared and authorised by the line manager prior to acceptance, and reported to the Governance Officer. Accepted hospitality (including the names of who offered the hospitality, who accepted it and whether they had their line manager's prior permission) will be reported to the Board by the Company Secretary on a regular basis.

6.4 If the hospitality is a networking event directly linked to the benefit of the functions of THH it may be appropriate to accept it – acceptance of hospitality whilst in attendance at relevant conferences, networking events and courses is acceptable where it is clear the hospitality is corporate rather than personal and there are benefits to THH through networking with colleagues in other organisations. However care should be taken if THH is already in a contractual position with the organisation. Hospitality must be refused if THH is participating in a procurement exercise which may involve the organisation offering it. Wherever possible, you should avoid taking part in any procurement evaluation if you have received hospitality from any of those bidding in the previous 12 months. If this is not practicable for any reason, you should declare your receipt of hospitality to the Director responsible for the procurement prior to your involvement, so that appropriate measures may be put into place, where necessary, to protect the interests of THH.

6.5 Hospitality would not include acceptance of subsidised or free-of-charge conferences and training, provided it is:

- linked to the functions of THH;
- proportionate in value; and
- a member of the public would consider it reasonable.

If the conference/training event is more than this, it should only be accepted where refusal will damage a relationship that is important to THH. However in these cases this would amount to hospitality and should be declared.

#### 6.6 Hospitality offered to you by THH

Ordinarily individuals would not need to declare this as hospitality where it is provided free of charge to all (e.g. staff conferences, staff awards, internal training courses, 'lunch and learn' events, essential breakfast meetings or working lunches, etc) or where tickets are purchased by the individual at the market price. However, where THH gives an individual a ticket they would ordinarily make a charge for, or a third party buys the ticket and offers a free place to a THH employee or Board member (including co-optees), attendance at the event must be declared and the line manager's permission obtained before the hospitality is accepted. In such circumstances, the hospitality must be declared to the Governance Officer if the value is over £15.00.

6.7 It is not necessary to declare any discounts received by virtue of being a THH employee or THH tenant/leaseholder, such as discounted commercial products, insurances,

gym memberships, etc. Likewise, hospitality such as a modest working lunch given in the course of normal business by one THH employee to a colleague (using their own money), or a manager buying their team a lunch to celebrate exceptional success (see the THH Expenses Policy section on Staff Entertainment), should not be recorded by the recipient. Nothing in this policy affects any other requirement to declare the benefit for tax purposes.

6.8 Function rooms may be hired for certain infrequent events if there is not suitable accommodation available within THH premises or the nature of the event demands that the function should take place away from THH premises (for example, a team away day may benefit from not being held in THH premises). The quality of the accommodation is to be appropriate to the nature of the event. Regular meetings and normal business/training should be held on THH premises.

#### 6.9 Offering hospitality to external organisations/individuals

Hospitality may be offered, in certain circumstances, to external organisations, representatives or individuals. Any hospitality offered should be based on the principle that expenditure on official hospitality must be:

- Justifiable: Hospitality must not be offered unless there is an identifiable THH interest in doing so.
- Moderate: It is important to ensure that THH is not open to criticism for lack of restraint or moderation when planning or hosting any hospitality.
- Appropriate: The standard of hospitality to be provided should be carefully judged according to the nature of the occasion and the position of THH as a holder of public money and wholly-owned subsidiary of a local authority.

Reciprocation for past hospitality is not in itself sufficient justification for the provision of official hospitality.

## 7. Frequently Asked Questions

### **7.1 Do all gifts have to be declared?**

Yes.

### **7.2 Does all hospitality have to be declared?**

Only if it has a value of £15.00 or more.

### **7.3 When is it not hospitality?**

- A working lunch or refreshments provided as part of a business meeting, free or subsidised training, provided it is of a value and nature as would appear reasonable to a member of the public. If a recipient is uncomfortable about the “lavishness” of any such refreshment, they may wish – to be on the safe side – to declare it.
- Refreshments or other hospitality provided by one of THH’s partners in service delivery, which is ancillary and proportionate to conducting THH’s business. If a recipient is uncomfortable about the “lavishness” of any such refreshment, they may wish – to be on the safe side – to declare it.
- Refreshments or other hospitality provided by THH, which is ancillary and proportionate to conducting THH’s business. For example refreshments/lunches/overnight stays provided as part of away days for staff, working lunches, long meetings or training sessions.

### **7.4 What if I receive an invitation to an event run by THH?**

If an individual is given a ticket to a THH organised event, which they would normally have to pay for, then a declaration must be made irrespective of value.

**7.5 What if I receive an invitation to attend a networking event at nil cost?**

You should determine with your line manager whether attendance is directly linked to your job/role and whether it is of benefit to THH. If this is the case you may decide it is appropriate to attend unless this may prejudice THH in any contractual matter or other relationship with the organisation.

**7.6 What if I receive an invitation to a sporting event?**

These should be refused unless you are satisfied that attendance is absolutely necessary for the benefit of THH, in which case prior written approval is required from the relevant line manager. Your line manager must be satisfied that attendance will not potentially prejudice THH in the future or give rise to any public concern whether justified or not.

**7.7 If I receive a gift what should I do?**

The general rule is that you can accept items of a nominal value (such as a pen, calendar or diary), but you should declare this to your line manager. For more material items to a value of £15.00 (such as a box of chocolates or bottle of alcohol), you should first seek the authorisation of your line manager to accept the gift, and if this is given you should then complete and submit a declaration form. Unless the gift is quickly perishable (such as flowers), in which case it should be displayed in the office or shared amongst colleagues, it should then be passed to the Governance Officer for raffling.

Gifts over £15.00 in value should be declared to your line manager and the Governance Officer and then refused and returned to the donor.

~~Note that these must not be accepted and must be returned unless the gift is of a nominal value (such as a diary, pen or calendar), the cost of returning it would be disproportionate, and there could be no potential prejudice to THH in it being accepted. A pen or paper given to you at a meeting/training event for use then and there is not a gift.~~

~~If the gift is quickly perishable, such as flowers, these may be accepted if the value is minimal, there is no potential prejudice and returning them may cause embarrassment to the donor. The gift should be declared and then displayed in the office/shared amongst THH colleagues.~~

~~Any other gift accepted because its value does not warrant return, where return would cause embarrassment and acceptance would not potentially prejudice THH, should be passed to the Governance Officer for raffling for charity.~~

**7.8 What do I do if I am offered any form of hospitality or gift?**

All gifts, and all offers of hospitality (of £15.00 or more), must be declared, whether accepted or not.

**8. Monitoring, review and impact assessment**

8.1 The registers of gifts and hospitality are always open for inspection by Senior Managers, Internal Audit and People Services. Any attempt or support attempt of bribery must be reported immediately to a member of the Executive Management Team (EMT), who will advise EMT colleagues, People Services, Internal/External Auditors and/or the Police as appropriate.


8.2 People Services will review this policy on a regular basis to ensure it remains compliant with any employment legislation revisions and good employment practice. ~~The Trade Union Forum will be fully consulted regarding any proposed changes.~~

8.3 The procedure has been subject to an impact assessment and no specific impact was identified in respect of any protected characteristic.

8.4 The Company Secretary shall monitor the use of this procedure and will report the register of gifts and hospitality to the Board on a regular basis.~~procedure will be monitored and the results reported to EMT and the Board.~~

Further Information can be obtained from People Services.

**Person responsible:** Company Secretary

<p align="center"><b>Board of Directors</b> 10<sup>th</sup> December 2019</p>	
<p><b>Report authorised by:</b> Sarah Pace, Head of Business Development</p> <p><b>Report Author:</b> Gulam Hussain</p>	<p><b>Report type:</b> For decision</p>
<p><b>Title: Scrutiny Review – Retrofitting Energy Efficiency Solutions in older properties</b></p>	

**1. Introduction**

1.1 This report provides recommendations and an action plan in response to a scrutiny review on Retrofitting Energy Efficiency Solutions in older properties.

**2. Recommendation**

THH Board is recommended to:

- Note the scrutiny review report (Appendix One) and agree its action plan (Appendix Two).

**3. Background**

3.1 In April 2018 the Residents’ Scrutiny Panel completed a scrutiny review on Energy Efficiency in New Build Properties. Amongst the findings of the review was a recommendation to carry out a further review focusing on the steps taken by THH to date and the potential to carry out further work to improve energy efficiency in older properties through retrofitting. In light of this recommendation, the ‘Retrofitting Energy Efficiency Solutions in older Properties’ scrutiny review was conducted in late June 2019.

3.2 The Climate Change Act (2008) sets out the legal framework for the UK to address and respond to climate change. The act required local authorities to reduce its emissions of carbon dioxide and other greenhouse gases by 100% of the 1990 levels, by 2050.

3.3 Although the UK has adopted national targets to achieve a reduction in emissions, successive revisions to regulations in a bid to encourage development have also resulted in policies supporting low carbon measures to be weakened, or entirely withdrawn. In light of this development, the Committee on Climate Change (CCC), an independent non-departmental public body established under the Climate Change Act 2008, published a



report in February 2019 arguing for the need for immediate Government action to support retrofitting across existing housing stock, for it to be included as a national infrastructure priority, and supported through measures from HM Treasury in order for the UK to meet its climate change obligations.

- 3.4 In London almost half of all homes were built before 1960. Older buildings in the capital are believed to contribute between 70 - 80% of London’s CO2 emissions, with housing alone responsible for nearly 36% of all emissions. Estimates from the Mayor of London’s Infrastructure Plan adopted in 2014 indicates around 80% of these buildings are expected to be still standing by 2050.
- 3.5 As part of the Mayor of London’s commitment for reducing emissions across London, the Greater London Authority (GLA) provides a number of support measures for local authorities in carrying out retrofit work. These include the Re: New Programme, Re: FIT scheme and the London Community Energy Fund. These schemes aim to facilitate the retrofitting of energy efficiency solutions to homes and public buildings whilst also offering access to energy from renewable sources.
- 3.6 In light of the recommendations from the Committee on Climate Change (CCC) and the commitments from the Mayor of London to enabling retrofitting of older properties, the Residents’ Panel sought to understand the relationship between improving energy efficiency and THH’s investment priorities, the nature and scale of energy efficiency work carried out in the past, and the challenges THH faces in rolling out wider investment in this area.
- 3.7 The review took place in June 2019 and was chaired by Residents’ Panel member James Wilson. Panel members in attendance included Simon Hart, Daniele Lamarche, Saleha Jafrin and Shahaveer Hussain.

Officers in attendance included:

<b>Abdul Khan</b>	<b>Service Manager – Energy and Sustainability</b> London Borough of Tower Hamlets (LBTH)
<b>Ben Coombes</b>	<b>Programme Manager – Energy and Environment</b> Greater London Authority (GLA)
<b>Peter David</b>	<b>Investment Planning Team Manager</b> Tower Hamlets Homes (THH)
<b>Ian Dalgleish</b>	<b>Investment Planning Officer</b> Tower Hamlets Homes (THH)
<b>Gulam Hussain</b>	<b>Scrutiny and Resident Feedback Manager</b> Tower Hamlets Homes (THH)
<b>Nojmul Hussain</b>	<b>Resident Feedback Officer</b> Tower Hamlets Homes (THH)

<b>Mas Momin</b>	<b>Resident Feedback Officer</b>
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	Tower Hamlets Homes (THH)
<b>Gregory Torrance</b>	<b>Business Information Officer</b> Tower Hamlets Homes (THH)

- 3.8 The report with recommendations is attached at Appendix One. Four recommendations have been made:

**Recommendation 1:**

The Council to procure energy for THH from sustainable sources

**Recommendation 2:**

THH to develop a strategic approach to underpin investment planning and responsive repairs

**Recommendation 3:**

THH to work with the refreshed RE: NEW programme to explore the potential for delivering further retrofit schemes

**Recommendation 4:**

THH to explore opportunities to transition Gas Boilers in existing properties to alternative energy efficient technologies

- 3.9 Service areas affected by the review have been invited to shape and agree the scope of the recommendations and provide feedback on the report. Responses have been captured as part of an action plan (**Appendix Two**).
- 3.10 The Residents' Panel will be kept updated on the progress of the action plan through a formal update report after 12 months in order to ensure the recommendations and learning from the review is being implemented.



**Residents' Panel**  
**Retrofitting Energy Efficiency Solutions in older properties**  
**Scrutiny Review Report**

6.1

**July 2019**

**Content**

<b>Chair's foreword</b>	<b>P3</b>
<b>Summary of recommendations</b>	<b>P2</b>
<b>Introduction</b>	<b>P4</b>
<b>National context</b>	<b>P4</b>
• <b>Carbon Offset Fund</b>	<b>P5</b>
• <b>Regional Support Schemes</b>	<b>P5</b>
<b>Tower Hamlets Context</b>	<b>P6</b>
<b>Retrofitting – Key challenges</b>	<b>P7 -10</b>
<b>Conclusion</b>	<b>P10</b>

## Chair's foreword



The energy efficiency of the Tower Hamlets Homes housing stock is an important aspect of residents' wellbeing and the borough's carbon reduction ambitions.

Both the health and financial wellbeing of residents is affected by the energy efficiency of their property. Living in a home with poor energy efficiency means residents have to spend more on their heating bills to keep warm, potentially pushing them into fuel poverty. If they choose to turn off their heating to save money, or are unable to heat it properly due to an inadequate heating system, living in a cold home can cause physical and mental health problems. These include worsening respiratory conditions and increasing the risk of circulatory conditions and mental health issues such as anxiety and depression. As well as affecting residents, these issues also have an impact on other public services, including putting increased pressure on the NHS.

According to the latest figures from 2017, residential properties were responsible for around 240,910 tonnes of carbon emissions in Tower Hamlets.[1]. With the Mayor of London and national government committed to becoming zero carbon by 2050, significant improvements in energy efficiency will have to be made to achieve this, whilst at the same time avoiding significantly increasing energy costs and pushing more residents into fuel poverty.

During our review we looked at the plans Tower Hamlets Homes has in place for improving the energy efficiency of its stock, and spoke to representatives from the Council and the GLA about the funds and programmes available. Although upgrades in energy efficiency have been achieved in several estates through the major works programme, and across the borough through a boiler replacement scheme, there is still a significant amount of work to do. Unfortunately at present there is little funding available from central or regional government. We have recommended that THH develops an Energy Efficiency Strategy to guide its future work in this area, and continues to collaborate with the GLA to explore how retrofit can be best achieved.

A handwritten signature in black ink, appearing to read 'James Wilson'.

James Wilson

### **Summary of Recommendations**

1. The Council to procure energy for THH from sustainable sources
2. THH to develop a strategic approach to underpin investment planning and responsive repairs
3. THH to work with the refreshed RE: NEW programme to explore the potential for delivering further retrofit schemes
4. THH to explore opportunities to transition Gas Boilers in existing properties to alternative technologies at the end of life (in line with government regulations for boilers serving communal heating systems in new builds post 2025)

**1. Introduction**

- 1.1 In 2018, the Residents’ Panel carried out a review exploring the use and maintenance of energy efficiency solutions in new build council properties. The review looked at how current national and local standards were considered in the design and delivery of new homes in the borough, and the support provided to new tenants to understand and make the most of the energy efficiency features within their homes.
- 1.2 As part of its recommendations, the Panel recognised the importance of exploring the opportunities available to THH to extend energy efficiency solutions to its existing stock through retrofitting schemes. This new review would seek to understand the relationship between improving energy efficiency and THH’s investment priorities, the nature and scale of energy efficiency work carried out in the past, and the challenges it faces in rolling out wider investment in this area.
- 1.3 The review also explored the support on offer through the Greater London Authority (GLA) as part the London Mayor’s commitment towards reducing carbon emissions, and the opportunities to draw on funding streams, such as the Carbon Offset Fund, through the Council.
- 1.4 The review took place in June 2019 and supported by Panel members James Wilson (Chair), Simon Hart, Daniele Lamarche, Saleha Jafrin and Shahaveer Hussain. Officers in attendance included:

<b>Abdul Khan</b>	<b>Service Manager – Energy and Sustainability</b> London Borough of Tower Hamlets (LBTH)
<b>Ben Coombes</b>	<b>Programme Manager – Energy and Environment</b> Greater London Authority (GLA)
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<b>Gregory Torrance</b>	<b>Business Information Officer</b> <b>Tower Hamlets Homes (THH)</b>

**2.0 National and regional context**

- 2.1 The Climate Change Act (2008) sets out the legal framework for the UK to address and respond to climate change. The act required local authorities to reduce its emissions of carbon dioxide and other greenhouse gases by 100% of the 1990 levels, by 2050. The Act includes a framework for achieving this target in the form of the ‘carbon budgets’ which legally restrict the amount of greenhouse gas the UK can legally emit in a five year period. Since the introduction of the Act the Government has made a commitment for moving towards achieving zero carbon homes for all new builds, from 2016, and in implementing its 2006 ‘Building a Greener Future’ policy statement to address concerns over the impact of climate change.

- 2.2 Data from the Buildings Performance Institute Europe suggests the UK has amongst the oldest homes in Europe with over half built before 1960. Figures published by the EU in 2013 suggested UK homes were some of the most expensive to heat in Europe due to poor insulation and poor maintenance.<sup>1</sup> Poorly insulated homes have been linked to various health problems and an increased risk of mortality. In 2018 National Energy Action<sup>2</sup> published a study suggesting the UK had the second worst rate of excess winter deaths, caused in part by fuel poverty.
- 2.3 Although the 2006 'Building a Greener Future' policy statement and the Climate Change Act (2008) aims to deliver the Government's vision for a low carbon future, its measures have largely focused on new developments. Successive revisions to regulations in a bid to encourage development have also resulted in policies supporting low carbon measures to be weakened, or entirely withdrawn. In 2018, only 1% of new homes in England met the requirements to be certified as Energy Performance Certificate Band A.<sup>3</sup> In light of this development, the Committee on Climate Change (CCC), an independent non-departmental public body established under the Climate Change Act 2008, published a report in February 2019 arguing for the need for immediate Government action to support retrofitting across existing housing stock, for it to be included as a national infrastructure priority, and supported through measures from HM Treasury.
- 2.4 In line with the national picture, almost half of all homes in London were built before 1960<sup>4</sup>. Older buildings in the capital are believed to contribute between 70 - 80% of London's CO<sub>2</sub> emissions, with housing alone responsible for nearly 36%<sup>5</sup> of all emissions. Estimates from the Mayor of London's Infrastructure Plan adopted in 2014 indicates around 80% of these buildings are expected to be still standing by 2050.
- 2.5 In light of London's ageing housing stock and the significant contribution on emission levels within the capital, the Mayor of London's 2010 Housing Strategy and subsequently the Mayor's Climate Change Mitigation and Energy, and the Climate Change Adaptation Strategies introduced measures aimed at encouraging retrofitting to reduce levels of energy and water consumption. The package of support included initiatives such as RE: NEW, designed to encourage the retrofitting of homes by providing local authorities and housing associations access to expert advice and frameworks of suppliers to assist the delivery process. Since its inception, the scheme has helped improve over 130,205 homes across London. Other support measures included the RE: FIT scheme designed to support retrofitting in public buildings, and the London Community Energy Fund offering a total of £400,000 in grant funding to community organisations for projects up to a maximum value of £15,000 per scheme.
- 2.6 In 2016, the GLA introduced carbon offset measures; requiring local authorities to collect payments from developments where carbon offset targets are not met. The revenue generated from offset funds is ring fenced specifically for carbon reduction projects within local boroughs. Whilst the main objective is for reducing energy demand in existing buildings through energy efficiency measures, other priorities include:
- generating renewable energy and renewable or very low carbon and low emission heat e.g. solar thermal, heat pumps or fuel cells, using solar PV, replacing higher carbon

<sup>1</sup> Carrington, D., 29<sup>th</sup> November 2013, 'Britain's damp, leaky homes among Europe's most costly to heat', The Guardian

<sup>2</sup> Cold Homes and Excess Winter Deaths, A preventable Public Health Epidemic that can no longer be tolerated - Pedro Guertler and Peter Smith

<sup>3</sup> Committee on Climate Change, February 2019, *UK-housing-Fit-for-the-future*

<sup>4</sup> Housing in London 2018, GLA

<sup>5</sup> CUTTING CARBON IN LONDON 2015 Update

systems that contribute to poor air quality such as gas-engine Combined Heat & Power networks (CHP)

- supporting low carbon heat networks
- undertaking whole building retrofit to improve energy and water efficiency

2.7 Retrofitting may sometimes provide overall better value for money as opposed to demolishing old buildings and replacing them with newer ones. Responding to climate change, meeting national targets as well as mitigating health risks can be addressed through improving insulation, replacing windows with air tight frames, double or triple glazing panes and improving electrical and heating appliances.

### 3.0 Reducing emissions in Tower Hamlets

3.1 The Department for Business, Energy & Industrial Strategy publishes data on borough wide emissions and published two years in arrears each June. Figures from 2017 show Tower Hamlets to have produced 1,238,000 tonnes of CO<sub>2</sub>. Despite this representing a 39% reduction compared to 2005 levels, the borough ranks as the third highest contributor to CO<sub>2</sub> emissions in London.

3.2 The Tower Hamlets Carbon Management Plan, developed in 2009 and refreshed and updated in 2016, commits the Council to a 60 per cent reduction in CO<sub>2</sub> emissions by 2020 (on 2007 levels) and becoming a zero carbon borough by 2030. To deliver its commitment, the Council has initiated a number of key carbon reduction projects which include:

- reducing energy costs and carbon emissions in council offices, community centres and libraries by 20 per cent through the Mayor of London's RE: FIT scheme
- a phased programme to replace all of the street lighting in Tower Hamlets with high efficiency LED lighting, which could save the Council £2.7million by 2020
- engagement with primary and secondary schools in the borough to save a possible £1.5million in fuel costs annually, which can instead be directed into frontline educational services.

3.3 As part of its strategy to improve energy efficiency and tackle fuel poverty, the Council has operated an energy co-op under the Big London Energy Switch scheme. Branded as Tower Hamlets Energy Community Power, the scheme aims to provide residents access to cheaper gas and electricity secured through the power of collective purchasing. During its last auction in May 2019, the scheme was estimated to deliver a saving of approximately £212 per household. As part of his manifesto commitment made during the 2018 elections, the Mayor of Tower Hamlets pledged to explore the creation of a publicly owned community energy company to continue to offer residents cheaper gas and electricity. Officers however noted that with the exception of Bristol Energy and Robin Hood Energy operated by Nottingham City Council, most other attempts by local authority have failed and have shown little additional benefits to customers over and above that which is offered through the energy switch scheme.

3.4 Since 2017, the Council's energy switch scheme has also been supported through the 'Affordable WARMTH Home Visits' programme offering free of charge advice and access to free energy saving measures for fuel poor and vulnerable residents. This includes measures such as low energy lights and draught proofing, radiator panels and where applicable top up loft insulation. As of February 2019 the scheme had delivered 383 visits leading to an estimated CO<sub>2</sub> emission reduction of 123,426kg.



- 3.5 In addition to the energy switching and advice schemes, the Council have also operated a free boiler replacement programme for home owners in the borough in receipt of a qualifying benefit. The programme funded through Carbon Offset contributions replaces existing boilers with a like-for-like 'A' rated high efficiency condensing boiler with upgraded heating controls. The scheme also advertised through THH, has delivered 68 new boilers since January 2018. In light of the success of the programme, funding has been made available for a second phase due to commence in Spring 2019 with a projected 160-170 boilers expected to be replaced over the duration of a three year programme.
- 3.6 In March 2019, in response to a petition asking it to declare a Climate Emergency the Council agreed to review its target and instead aim to become a zero carbon borough by 2025. The petition also commits the Council to divesting funds from fossil fuel related industries, and improving energy efficiency through better access for local businesses and residents to affordable green energy.
- 3.7 Although the Council seeks to achieve its ambitious target of becoming a carbon neutral borough by 2025, it also recognises that it only contributes directly to a small percentage of the emissions produced in the borough. Areas such as Canary Wharf contribute significantly to the level of emissions produced by the borough. This requires the Council to adopt a collaborative approach, working alongside a wide range of partners.
- 3.8 Whilst recognising the Council's commitment to reducing its carbon footprint and the wide range of support on offer for residents, the Panel queried whether the energy sourced through the Council's energy co-op was from sustainable sources. Officers advised that cost was the primary driver influencing purchasing decisions for the co-op as its primary objective is to offer cheaper, affordable energy for residents. There is however a recognition that consideration should be given to the sustainability of the energy sourced.
- 3.9 Officers highlighted that in light of the funding pressures faced by public sector organisations, it was often very difficult to balance the desire to procure sustainable goods and services against the need to achieve the maximum value for money. The Council, driven by its commitment to becoming a carbon neutral organisation, was nonetheless exploring how it currently meets its own energy requirements. This includes exploring the possibility of transitioning away from energy sourced through frameworks managed by HM Treasury to the London Energy Project which offers affordable and sustainable energy for 36 member authorities. This shift would also ensure energy purchased for THH by the Council would also be drawn from sustainable sources.

**Recommendation 1:**

The Council to procure energy for THH from sustainable sources

**4.0 Retrofitting THH stock**

- 4.1 Since 2010 THH has delivered a range of retrofitting schemes of various sizes and complexity to its housing stock across the borough. Improvements have included a range of measures such as insulating roofs, and external walls benefitting in excess of 4,000 homes. Other measures have included upgrading glazing and installing high efficiency communal heating systems to reduce the cost of energy use.

- 4.2 Recent schemes have included improvements to Brodick House, located on the St Stephen's Estate. The works completed in 2017 were supported by a £369,000 funding contribution to an existing capital budget through the Energy Company Obligation (ECO) scheme which requires large energy suppliers to provide support to households to benefit from energy efficiency measures. The works aimed to address issues of poor thermal comfort, condensation and high carbon emissions through the installation of the Permarock external wall insulation system, upgraded double glazing and the installation of a high efficiency communal heating system with individual heat interface units for each dwelling.
- 4.3 In 2016, THH delivered a scheme across the Avebury and Bancroft Estates installing energy efficiency measures across 25 blocks affecting 317 dwellings. The scheme costing in the region of £4 million was made possible through a £2.254m contribution from the Department of Energy & Climate Change, now part of the Department for Business, Energy & Industrial Strategy. The works included External Wall Insulation, including roof insulation, to improve thermal performance and reduce the carbon footprint. This has delivered an estimated reduction in fuel costs by £136 per household each year, and is expected to deliver 5,300 tonnes of CO<sub>2</sub> savings over the course of its lifetime.
- 4.4 Whilst recognising the scale and range of improvements delivered to existing dwellings, members of the Panel noted that there appeared to be limited progress since 2017 in continuing to roll out similar schemes across the remainder of THH's existing stock. Officers highlighted that the events at Grenfell Tower in 2017 had significant impact on investment priorities as a result of which the focus now was on improving fire safety rather than addressing energy efficiency. The limits on resources and the lack of external funding which made previous schemes possible had meant it is not possible to continue to actively pursue large scale retrofitting projects whilst delivering the required level of investment to deliver fire safety improvements across THH's housing stock. Despite this THH was still taking small steps through its Better Neighbourhoods Investment Programme to upgrade features such as new double glazing, new insulated roofs and communal lighting to more efficient solutions. In addition to small scale changes through the Better Neighbourhoods programme, THH was also looking at new technologies such as heat monitoring technology to help identify inefficiency and direct investment.
- 4.5 The Panel queried whether THH had an agreed set of minimum standards on energy efficiency which informs its approach and choice of products and services used to deliver capital investment programmes and the responsive repairs function. Officers explained that THH did have some informal guidance which set out some standards but this had not been fully developed or formally adopted. Measures included in these standards largely focused on ensuring properties have basic energy efficiency measures such as double glazing in place.
- 4.6 The Panel stressed the importance of ensuring THH had a clear and formally agreed strategy in order to realise the wider potential to improve energy efficiency across its housing stock through its planned capital investment and responsive repairs functions.

**Recommendation 2:**

THH to develop a strategic approach to underpin investment planning and responsive repairs

- 4.7 The Panel sought assurance on whether THH had actively engaged with opportunities such as the Mayor of London's RE: NEW programme to maximise the possibility of expanding its retrofitting programme. Officers confirmed that there had been engagement with the RE: NEW programme as part of the retrofitting projects undertaken by THH. There was however a lack of communication as a result of the lack of major schemes being in the pipeline and the loss of key contacts from within the GLA.
- 4.8 The Panel noted that the GLA was currently in the process of refreshing its offer under the RE: NEW programme. The refreshed offer is expected to launch later in the year will include free advice and support on a range of areas, such as guidance on carrying out stock assessments, programme optimisation, support for building business cases for retrofitting, identifying funding sources and assistance with the procurement process.
- 4.9 In light of the renewed offer from the GLA, the Panel recommended that officers from THH seek to re-establish links with the RE: NEW programme in order to explore the potential for delivering further retrofit schemes across the borough.

**Recommendation 3:**

THH to work with the refreshed RE: NEW programme to explore the potential for delivering further retrofit schemes

**5.0 Improving efficiency through district heating systems**

- 5.1 Members of the Panel cited examples from Denmark and queried whether the Council or THH were considering expanding the use of district heating systems which are recognised to offer cheaper and greener heat. THH currently manages 61 heat networks on behalf of the council. These range from small scale communal heating systems serving one block to larger district heating systems serving multiple blocks and several hundred dwellings. Officers from the Council advised attempting to retrofit such solutions can be very costly and often not feasible given the restrictions on funding. Whilst there were no immediate plans to explore the possibility of retrofitting district heating networks, there was appetite to make greater use of them as part of new developments, including new council homes which will be managed by THH.
- 5.2 Officers from THH highlighted that communal heating solutions were often unpopular with leaseholders who often expressed a preference for individual boilers. This in turn undermines the potential benefits that can be achieved through district heating systems. There also challenges to renewing ageing systems and the lack of regulation around district heating in the UK. At present, energy suppliers are not required to cap energy prices in line with the price caps set by Ofgem resulting in many residents across the UK locked in to a supply from a single provider and paying more for their energy. Data compiled by the Competition and Market Authority (CMA), who work to promote competition for the benefit of consumers, suggests that there were 14,000 heat networks across the UK in 2018 with some offering 'poor value for money'.
- 5.3 Although there was limited scope for expanding the use of district heating across existing THH stock, work was currently underway to replace boilers older than 12 years with newer models that are more efficient and easier to maintain. As an additional benefit to the programme, this also provides residents with newer and more efficient models where possible helping to reduce the cost of energy use.

- 5.4 The Panel noted the work being undertaken by THH through its boiler replacement programme but noted that recent government regulations will restrict the installation of gas boilers serving communal heating systems in new build properties as of 2025. In light of this change, the Panel recommended that consideration is given to the types of solutions used by THH as part of its existing replacement programme in order to rationalise its repairs and maintenance arrangements post 2025.

**Recommendation 4:**

THH to explore opportunities to transition Gas Boilers in existing properties to alternative technologies at the end of life (in line with government regulations for boilers serving communal heating systems in new builds post 2025)

**6.0 Resident led retrofitting**

- 6.1 The scale at which energy efficiency projects can be delivered is largely dependent on the availability of funding. To date, most of the retrofitting work across THH’s housing stock has been made possible through a range of funding initiatives driven by government. This has included schemes such as the Social Housing Energy Savings Programme, the Energy Company Obligation scheme and funding from the Department for Business Enterprise and Industrial Strategy (BEIS). To be able to continue delivering large scale retrofit programmes across THH’s housing stock, there is a need for retrofitting to be recognised as key to meeting the UK’s carbon emissions targets, and supported through significant funding from government as highlighted by the Committee on Climate Change (CCC).
- 6.2 Whilst noting the challenges, the Panel explored the potential for residents as individuals or collectives to take advantage of opportunities to independently secure access to energy efficiency measures, such as solar panels. Officers advised that at present there was no provision which would facilitate such requests. In the event of significant demand from residents, the matter would need to be referred to the Council for it to adopt a formal policy on the issue. In the interim, schemes such as the Council’s boiler replacement or home visits programme would be promoted to residents through THH’s existing communication channels.
- 6.3 The Panel concluded its review by noting that its recommendations would be formally presented to the Tower Hamlets Homes Board before being adopted. Once agreed, an action plan would be produced setting out how these recommendations would be implemented. A progress update would be offered to the Panel in 12 months.





## SCRUTINY REVIEW ACTION PLAN 2019-20

### Energy Efficiency through Retrofitting

	Recommendation	Actions	Lead	Completion
1	The Council to procure energy for THH from sustainable sources	The Council procures energy through a bulk contract for landlords supply. The Council buys at a competitive commercial rate and green energy tariffs are generally more expensive than brown energy tariffs. When there is an opportunity to switch tariffs the Council always looks to procure green tariffs where it is at the same cost or cheaper. In the longer term we are looking to transition THH away from the energy framework managed by HM Treasury to the London Energy Project enabling it to benefit from energy drawn from renewable sources.	Service Manager, Energy and Sustainability, (LBTH)	On-going
2	THH to develop a strategic approach to underpin investment planning and responsive repairs	THH is currently in the process of reviewing its Business Plan. This provides us an opportunity to explore the role of energy efficiency and sustainability as an organisational priority and adopt and implement standards that will inform our approach to Investment planning and Responsive Repairs. Energy Efficiency and environmental sustainability standards will also be included as part of the re-procurement of the Responsive Repairs contract.	Head of Property Services / Business Development / Repairs	Business Plan – March 2020 Asset Strategy – August 2020 New Repairs Contract – April 2021
3	THH to work with the refreshed RE: NEW programme to explore the potential for delivering further retrofit schemes	The successor programme has not been launched by GLA as of yet. This area will continue to be monitored and will be included as part of the refreshed THH Asset Management Strategy.	Head of Property Services	On-going



## Tower Hamlets Homes Residents' Panel

# SCRUTINY REVIEW ACTION PLAN 2019-20

	Recommendation	Actions	Lead	Completion
4	THH to explore opportunities to transition Gas Boilers in existing properties to alternative technologies at the end of life (in line with government regulations for boilers serving communal heating systems in new builds post 2025)	This area is being added to the THH Asset Management Strategy. The Resident's Panel will be kept informed of developments and invited to play a part in shaping the priorities in the revised strategy. THH will also commission a study to understand the cost implications for replacing boilers with newer technology.	Head of Property Services	Oct-Dec 2020

<p style="text-align: center;"><b>Board of Directors</b></p> <p style="text-align: center;">10 December 2019</p>	
<p><b>Report authorised by:</b> Paul Davey, Director of Business Transformation</p> <p><b>Report author:</b> Steve Phillpott, Head of People Services</p>	<p><b>Report type:</b> For decision</p>
<p><b>Title:</b> Social Media and Networking Policy for Staff</p>	

**1. Introduction**

- 1.1. This paper proposes to Board a new “Social Media and Networking Policy” for THH. The issue of social media use by staff, in the form of ‘closed’ instant messaging groups, has materialised as an issue in recent employee relations cases, of which Board is aware, and it is felt that THH requires a new policy to cover this evolving area.
- 1.2. The purpose of this paper is to obtain Board agreement to implement the new Social Media and Networking Policy. The proposed policy has been consulted on with SMT and EMT and has been checked by THH’s legal advisors.

**2. Recommendation**

- 2.1 To agree to implement the attached policy with immediate effect

**3. Basis of our approach**

- 3.1. A total ban on the use of social media at work would be a somewhat draconian and impractical option for THH, as many of our staff legitimately use social media as part of their work, and this is a growth area for many of our communications, marketing and community engagement activities. In addition, such a policy would be impractical to monitor, with staff able to access such sites during working hours via their own devices and outside of the THH ICT network.
- 3.2. However, the policy does give guidance on acceptable personal use, advising employees to restrict their use of personal social media and networking to their official breaks. In practice, therefore, our position is that we will not actively monitor personal use but we are reserving the right to intercede if a manager feels that an employee’s use of social media is resulting in performance or productivity issues.
- 3.3. The policy contains provisions on the acceptable and unacceptable use of social media and instant messaging, particularly around breaching confidentiality (of residents or other staff members) and around harassment or bullying, reflecting our zero-tolerance approach to these issues.

**4. Issues/considerations**





- 4.1. There is a considerable body of legislation that is relevant to the use of social media and networking, of which the policy seeks to take account. The key legal issues are addressed as follows:
- 4.2. **Monitoring of employee internet use:** The policy makes clear how we monitor internet use to detect unauthorised or excessive use, and references arrangements regarding our Data Protection Officer, and so should meet the requirements of the General Data Protection Regulation (GDPR) and Investigatory Powers (Interception by Businesses etc. for Monitoring and Record-keeping Purposes) Regulations 2018. In practice, what classes as excessive or inappropriate may vary from service to service.
- 4.3. For data protection purposes, internet usage data is recorded by LBTH (who provide ICT services to THH), and this data can be requested for release to THH. As part of this process, THH need to justify its interests, and LBTH will balance this against impact on the rights of the individual concerned before deciding whether to release the data.
- 4.4. **Right to a private life:** The policy takes account article 8 of the European Convention on Human Rights (listed in schedule 1 of the Human Rights Act 1998), which covers the right to respect for private and family life.
- 4.5. Whilst an employee who makes a defamatory statement that is published on the internet may be legally liable for any damage to the reputation of the individual concerned, their employer may be vicariously liable for the acts of an employee done in the course of employment, even if performed without the consent or approval of the employer. Similarly, THH can sue if a defamatory statement is made in connection with its business or trading reputation. Therefore, it is in our legitimate interests to proportionately monitor the internet use of employees whilst at work and when using THH ICT equipment or networks.
- 4.6. The policy provides clarity on the circumstances in which THH will undertake searches on social media in respect of prospective employees who have applied for a job with THH. Throughout the recruitment process, all job applicants are protected from discrimination because of the protected characteristics listed in the Equality Act 2010. As social media websites may display personal details such as age, religion and beliefs and sexual orientation, employers should avoid using these websites to look for background information about job applicants; the policy is clear that any searches are only to be made to corroborate aspects of the application connected with an individual's declared professional history, and not their personal characteristics.
- 4.7. **Online harassment:** If an employee is subjected to harassment because of protected characteristics (with the exceptions of marriage and civil partnership, and pregnancy and maternity), they may have grounds to bring a complaint to an employment tribunal under the relevant anti-discrimination legislation. The policy reflects that fact that harassment can take place in online environments such as social media websites, and that employers can be liable for anything done by an employee in the course of their employment, whether or not it was done with the employer's knowledge or approval. By making our approach to this issue clear, the policy supports THH's in defending itself by taking reasonably practicable steps to prevent the harassment.
- 4.8. **Political impartiality:** the policy sets relevant guidance on the use of THH resources for publicity purposes into the context of social media use, and also discusses the heightened restrictions in place during pre-election periods and how these affect social media use.

## 5. Equality Impact

- 5.1. The proposed policy has been considered from an equalities perspective. It is applicable to all staff and so does not directly discriminate on the grounds of any protected characteristic. The policy is not felt to be indirectly discriminatory on the grounds of any protected characteristic; however, as with all HR policies, due consideration will need to be given when enforcing the policy to the circumstances at hand.



5.2. In line with the requirements of the Public Sector Equality Duty, consideration has been given as to how the attached policies promote equality of opportunity. As part of the Duty, we must take positive action to eliminate employee behaviour that could cause distress and anxiety to others in the workplace, including activity taking place on social media websites. The policy does this, whilst reflecting our zero-tolerance policy in relation to bullying and harassment. It clearly outlines what is regarded as unacceptable use of social media and networking at work, and outside the workplace where this affects work relationships or could cause THH reputational or financial damage.

## **6. Appendices**

### a) Social Media and Networking Policy

Further information is available upon request from Steve Phillpott, Head of People Services.



# Social Media and Networking

December 2019

This is a THH Human Resources Policy.	
This policy provides guidance on the appropriate use of corporate social media, and of personal social media and instant messaging in a work-related context.	
<b>Previous version edited:</b>	None
<b>Date edited:</b>	21/11/2019
<b>Author:</b>	Steve Phillpott, Head of People Services
<b>Owner:</b>	Steve Phillpott, Head of People Services
<b>Approved by:</b>	THH Board   10/12/2019
<b>Review cycle (years):</b>	Three years
<b>Next review date:</b>	01/10/2022

## 1. Policy objectives

1.1 Tower Hamlets Homes (THH) recognises that its staff use social media and social networking forums in their personal lives to communicate to a wide variety of audiences, including the general public, and do so mostly without problem or incident.

1.2 Whilst THH respects this right to a private life, it must also ensure that the confidentiality of its residents and employees, and its reputation, are protected. Similarly, THH staff should be mindful that they represent THH in their daily lives and care should be taken to eliminate the risk of personal and professional matters becoming linked.

1.3 THH therefore requires employees using corporate and personal social media – whether accessed using work or personal ICT equipment, and whether accessed during work or personal time – to ensure that they do not conduct themselves in a way that is detrimental to THH, and to take care not to allow their interaction on social media to damage working relationships amongst members of staff and/or between staff, partners and stakeholders of THH.

1.4 Additionally, THH operates a range of corporate social media and social networking accounts, as well as its own Enterprise Social Media platforms. THH also recognises that its staff will use THH ICT devices and networks, as well as personal ICT equipment, to access both personal and work-related social media.

1.5 The purpose of this policy therefore is to provide guidance on the appropriate use of personal and corporate social media in order to safeguard the reputations of the employee, other individuals, and of THH. The intention is not to interfere with an employee’s personal life or to discourage them from using social media outside of work. The aim is to highlight the potential risks and issues that can arise due to inappropriate use of these platforms and the consequences this could have on an individual’s employment with THH.

## 2. Scope

2.1 This procedure will apply to all employees of THH, workers such as agency workers, consultants and interim contractors, and Members and Co-optees of THH’s Board and Committees.

### 3. Status

3.1 This is a THH employment procedure. Its provisions do not form part of the contract of employment and we reserve the right to vary or withdraw them unilaterally.

### 4. Definition of social media

4.1 For the purposes of this policy, social media is any online platform or app that allows parties to communicate instantly with each other or to share data in a public forum (whether restricting the visibility of that content to 'contacts' or 'friends' of the user, members of a 'group', or making it available to the general public on an unrestricted basis). This includes social forums such as Twitter, Facebook, LinkedIn and Glassdoor. Social media also covers blogs and video and image-sharing websites such as Instagram, SnapChat and YouTube.

4.2 Employees should be aware that there are many more examples of social media than can be listed here and this is a constantly changing area. Employees should follow these guidelines in relation to any social media that they use.

4.3 This policy distinguishes between "personal social media", which is primarily about you (for example, your own Twitter profile), and "corporate social media", which are official channels for THH, such as THH's corporate Twitter profile.

4.4 Social media sites such as Facebook Workplace, Yammer and Slack, etc, are referred to as 'Enterprise Social Media', and access is restricted to authorised users within THH.

4.5 Instant Messaging (IM) services such as WhatsApp, Facebook Messenger and Microsoft Lync are considered under this policy where they are used to discuss work or exist primarily because of active relationships at work.

4.6 The use of corporate networking channels, such as customer services webchat tools, are covered by the broader rules on customer service and the Staff Code of Conduct. Staff should however observe the principles contained within this policy when using these tools.

### 5. Use of social media at work

#### 5.1 Use of personal social media at work

Employees are allowed to access personal social media from THH's computers or devices at certain times (provided that they are not undertaking overtime, flexitime or time off in lieu). Employees must limit their use of personal social media to their official rest breaks, such as their lunch break and times when they are between jobs/appointments, for example when travelling, times when they are not on duty, times when they are not manning the telephones, and times when they are not on the site where they are working.

5.2 THH also understands that employees may wish to use their own computers or devices to access personal social media while they are at work. In such circumstances, again employees must limit their use of personal social media to their official rest breaks, such as their lunch break and times when they are between jobs/appointments, for example when travelling, times when they are not on duty, times when they are not manning the telephones, and times when they are not on the site where they are working.

#### 5.3 Use of corporate social media at work

THH encourages certain employees to make reasonable and appropriate use of corporate social media as part of their work. It is an important part of how THH communicates with its residents and industry connections and promotes its services. These employees may contribute to THH's corporate social media activities, for example our corporate Twitter, Facebook, Instagram and LinkedIn accounts.

5.4 Employees must be aware at all times that, while contributing to THH's social media activities, they are representing the organisation. Staff who use social media as part of their job must adhere to the following rules.

5.5 Employees should use the same safeguards as they would with any other form of communication about THH in the public sphere. These safeguards include:

- making sure that the communication has a purpose and a benefit for THH;
- obtaining permission from the Communications Manager before embarking on a public campaign using social media.

5.6 Any communications that employees make in a professional capacity through social media must not:

- bring the organisation into disrepute, for example by criticising or arguing with customers, colleagues or rivals;
- making defamatory comments about individuals or other organisations or groups; or
- posting/sharing images that are inappropriate, or links to inappropriate content;
- breach confidentiality, for example by:
  - revealing trade secrets or information owned by THH, giving away confidential information about an individual (such as a colleague or customer contact) or organisation (such as LBTH, a contractor or another housing provider); or
  - discussing THH's internal workings (such as its future business plans that have not been communicated to the public);
- breach copyright, for example by:
  - using someone else's images or written content without permission; or
  - failing to give acknowledgement where permission has been given to reproduce something;
- do anything that could be considered discriminatory against, or bullying or harassment of, any individual, for example by: making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age;
- using social media to bully another individual (such as another THH employee); or
- posting images that are discriminatory, violent or offensive, or links to such content.

5.7 As THH is a wholly-owned subsidiary of LBTH, it is important that it is seen as politically impartial. THH staff should therefore be mindful at all times – including when using social media and networking – about the permitted and prohibited use of THH resources and issues of political sensitivity and discretion. Sections 12 and 13 below give more information about this.

#### **5.8 Use of social media in the recruitment process**

Unless it is in relation to finding candidates (for example, if an individual has put their details on social media websites for the purpose of attracting prospective employers), the People Services team and managers should conduct searches, either themselves or through a third party, on social media only when these are directly relevant to the applicant's skills or claims that they have made in the recruitment process. For instance:

- a prospective employee might claim that they have used social media in their previous job (for example, as a publicity tool); or

- a prospective employee's social media use may be directly relevant to a claim made in their application (for example, if they run a blog based around a hobby mentioned in their CV or a skill in which they claim to be proficient).

5.9 There should be no systematic or routine checking of prospective employees' online social media activities, as conducting these searches during the selection process might lead to a presumption that an applicant's protected characteristics (for example, sexual orientation or religious beliefs) played a part in a recruitment decision. This is in line with THH's Equality and Diversity in Employment policy.

#### **5.10 Excessive or inappropriate use of social media at work**

Employees should not spend an excessive amount of time while at work using personal or non-work related social media. They should ensure that use of personal social media does not interfere with their other duties. This is likely to have a detrimental effect on employees' productivity.

5.11 Whilst THH respects the right of individuals to a private life, THH staff should be mindful that social media forums can include content that is inappropriate for the workplace, including nudity, sex, violence, abuse of drugs, and gambling. Such content should not be viewed from within THH premises, including corporate vehicles, or in personal vehicles whilst being used for work purposes. Such content must not be accessed using THH ICT equipment or networks, to which THH's ICT Policy applies.

5.12 THH recognises that individuals may have or feel an addiction to such content. In these circumstances, THH encourages individuals to make contact with the Employee Assistance Programme on 0800 015 7287, the Mental Health First Aid network (via the intranet), or to contact People Services on [hr@thh.org.uk](mailto:hr@thh.org.uk) to gain support through the MIND counselling service or through occupational health.

5.13 When using personal or corporate social media, staff should bear in mind that they should not use any language that could reasonably be seen to be intimidating, hostile, offensive or discriminatory, remembering also that the tone in which something is said may not come across as intended when using written formats. Staff should never send any message via social media in anger or haste, and before sending any message staff should stop, reflect on how the message might be interpreted, and correct or clarify the message as necessary. If in doubt, do not send the message. It is important to recognise that the recipient of the message may interpret it, quite reasonably, in a very different way to what was intended. Equality legislation makes it clear that the effect of the message is equally as important as the intent when establishing whether something is offensive. THH has a zero-tolerance policy in relation to bullying and harassment, and this extends to social media and networking.

#### **5.14 Monitoring use of social media during work time**

THH reserves the right to monitor employees' use of personal social media on THH's equipment. THH considers that valid reasons for checking an employee's internet usage include suspicions that the employee has:

- been using personal social media for personal/non-work related reasons when they should be working; or
- been spending an excessive amount of time using social media that is not work-related when you should be working; or
- acted in a way that damages the reputation of THH and/or breaches commercial confidentiality; or
- acted in a way that exposes THH to potential legal or financial liabilities; or
- acted in a way that constitutes harassment of another employee; or

- acted in a way that jeopardises the continued relationship between THH and another employee, a tenant, leaseholder or other partner/stakeholder; or
- acted in another way that is in breach of the rules set out in this policy.

5.15 THH's ICT services are provided via LBTH, and so monitoring will be conducted by LBTH on THH's behalf. Monitoring is in LBTH's and THH's legitimate interests and is to ensure that this policy on use of social media and networking is being complied with.

5.16 Monitoring will consist of checking the social media and instant messaging sites/platforms that an employee has visited, the duration and timing of such visits, and the content that the employee has contributed on such sites/platforms.

5.17 The information obtained through monitoring may be disclosed to THH upon request, where the appropriate LBTH ICT Investigation Request Form has been submitted and approved by LBTH. This form captures the reasons why THH feels it appropriate to monitor or release data on individual usage, and decision-making by LBTH will balance THH's interests against the individual worker's rights. Once data is received by THH, it may be shared within THH, including with members of the People Services team, and worker's line manager, managers in the business area in which the worker works, and with THH ICT staff, where access to the data is necessary for performance of their roles. However, information would normally be shared in this way only if THH has reasonable grounds to believe that there has been a breach of the rules set out in this policy.

5.18 The information gathered through monitoring will be retained only long enough for any breach of this policy to come to light and for any investigation to be conducted. Monitoring data given to THH will be retained in line with THH's data retention policy. THH does not apply automated decision-making to the data obtained through monitoring.

5.19 Information obtained through monitoring will not be disclosed to third parties (unless THH is under a duty to report matters to a regulatory authority or to a law enforcement agency).

5.20 Workers have a number of rights in relation to their data, including the right to make a subject access request and the right to have data rectified or erased in some circumstances. You can find further details of these rights and how to exercise them in THH's data protection policy. If workers believe that THH has not complied with their data protection rights, they can complain to the Information Commissioner. The data controller is THH's Head of Resources, who can be contacted at [data@thh.org.uk](mailto:data@thh.org.uk). The Head of Resources is also THH's Data Protection Officer.

## **6. Use of social media in your personal life**

6.1 THH recognises that many employees make use of social media in a personal capacity. While they are not acting on behalf of THH, employees must be aware that they can damage THH if they are recognised as being one of our employees.

6.2 Employees are allowed to say that they work for THH, which recognises that it is natural for its staff sometimes to want to discuss their work on social media. However, the employee's personal online profiles (for example, the name of a blog or a Twitter name) must not contain THH's name.

6.3 If employees do discuss their work on social media (for example, giving opinions on their specialism or the sector in which THH operates), they must include on their profile a

statement along the following lines: "The views I express here are mine alone and do not necessarily reflect the views of my employer."

6.4 Any communications that employees make in a personal capacity through social media must not:

- bring the organisation into disrepute, for example by criticising or arguing with customers, colleagues or rivals;
- making defamatory comments about individuals or other organisations or groups; or
- posting/sharing images that are inappropriate, or links to inappropriate content;
- breach confidentiality, for example by:
  - revealing trade secrets or information owned by THH, giving away confidential information about an individual (such as a colleague or customer contact) or organisation (such as LBTH, a contractor or another housing provider); or
  - discussing THH's internal workings (such as its future business plans that have not been communicated to the public);
- breach copyright, for example by:
  - using someone else's images or written content without permission; or
  - failing to give acknowledgement where permission has been given to reproduce something;
- do anything that could be considered discriminatory against, or bullying or harassment of, any individual, for example by: making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age;
- using social media to bully another individual (such as another THH employee); or
- posting images that are discriminatory, violent or offensive, or links to such content.

6.5 Social media must not be used to raise whistleblowing or fraud concerns or grievances. Any legitimate concerns should be addressed through the appropriate policies.

6.6 As THH is a wholly-owned subsidiary of LBTH, it is important that it is seen as politically impartial. THH staff should therefore be mindful at all times – including when using social media and networking – about the permitted and prohibited use of THH resources, and issues of political sensitivity and discretion. Sections 12 and 13 below give more information about this.

6.7 Employees should be aware that social media Apps and websites are publically accessible, and content that they publish can be copied, shared and saved to other people's computers. Employees should not assume that their entries on any social media website or App will remain private.

## **7. Use of instant messaging in a work-related context**

7.1 This policy considers the use of IM where it is used, either on a one-to-one or group basis, to discuss work, and/or where it is used primarily because of active relationships at work (i.e. members of a group chat who are all current or former THH staff who do not tend to socialise as a group outside of work). In such circumstances, this policy applies whether participants were using their work or personal devices, and whether participants were sharing such content during work or personal time. In essence, therefore, this policy covers all "work-related" use of IM.

7.2 This policy does not cover situations where a group of people who are THH employees have formed a close friendship, socialise regularly outside of work, and share content using their personal devices outside of work time. However, in such circumstances,



participants are reminded that their actions and conduct on such IM groups may have an impact on workplace relationships and performance, which then becomes an issue that THH must deal with.

7.3 THH supports the use of IM for work-related activities for short and immediate communication. THH provides an IM platform for this purpose (currently Microsoft Lync).

7.4 THH staff are expected to use IM responsibly and professionally, whether using the corporately-provided platform or any other platforms chosen by staff (such as WhatsApp). This means that:

- Content shared via IM should be shared in accordance with usual THH policies regarding data protection, ICT security, and Equality and Diversity in Employment, as well as the Staff Code of Conduct.
- Where THH ICT equipment or networks (including Wifi) is being used to access content, all policies and guidelines pertaining to use of email and the internet also apply.
- THH staff using such forums should bear in mind that where records are made, all content shared is disclosable under the Data Protection Act and Freedom of Information Act, just as with emails. It is also easy for others to share content posted to IM platforms, and so privacy should never be assumed.
- IM platforms are often unencrypted and are often hosted on servers based outside the European Economic Area (EEA). Therefore, sensitive data, such as username, passwords, account numbers and other personal data should not be passed via IM as it could be read by other parties other than the intended recipient(s). Transferring sensitive data, and transferring files, using IM is therefore not allowed.
- THH staff using such forums should behave in a professional and courteous manner at all times; profanities, or offensive or derogatory slurs, are not acceptable.

7.5 When using IM, staff should bear in mind that they should not use any language that could reasonably be seen to be intimidating, hostile, offensive or discriminatory, remembering also that the tone in which something is said may not come across as intended when using written formats. Staff should never send any message via IM in anger or haste, and before sending any message staff should stop, reflect on how the message might be interpreted, and correct or clarify the message as necessary. If in doubt, do not send the message. It is important to recognise that the recipient of the message may interpret it, quite reasonably, in a very different way to what was intended. Equality legislation makes it clear that the effect of the message is equally as important as the intent when establishing whether something is offensive. THH has a zero-tolerance policy in relation to bullying and harassment, and this extends to social media and networking.

## **8. Equipment used to access social media and instant messaging**

8.1 Employees should not install unauthorised social media programs or Apps onto THH's computers or devices. THH ICT equipment is not to be used to access personal social media.

8.2 THH understands that employees may wish to use their own computers or devices, such as laptops, smart phones, tablets, hybrid and hand-held devices, to access Enterprise Social Media or personal social media. When posting content from an employee's own device to corporate social media channels or to Enterprise Social Media, care should be taken to ensure that this policy is abided by in respect of appropriateness, content and tone.



8.3 THH reserves the right to restrict access (temporarily or permanently) via THH ICT equipment, devices or networks to social media, Enterprise Social Media, and to instant messaging platforms, without notice or appeal.

## 9. Security and identity theft

9.1 Employees must be security conscious and should take steps to protect themselves from identity theft, for example by restricting the amount of personal information that they give out. Social networking websites and Apps allow people to post detailed personal information such as date of birth, place of birth, mother's maiden name and favourite football team, which can often form the basis of security questions and passwords they may use (including those for THH's own ICT systems). In addition, employees should:

- ensure that no information is made available that could provide a person with unauthorised access to THH and/or any confidential or commercially sensitive information; and
- refrain from recording any confidential or commercially sensitive information regarding THH on any social networking website.

9.2 Social media is commonly used by the online criminal community to deliver malware and carry out schemes designed to damage property or steal confidential information. To minimise risk related to such threats, employees should adhere to the following guidelines. While these guidelines help to reduce risk, they do not cover all possible threats and are not a substitute for good judgment.

- DO use a security application such to protect personal and company social media pages when using personal ICT equipment.
- DO configure social media accounts to high privacy levels, and encrypt sessions whenever possible. Facebook, Twitter and others support encryption as an option.
- DO NOT use the same passwords for social media that you use to access company computing resources.
- DO NOT follow links or download software on social media posted by individuals or organisations that you do not know.

9.3 If any content you find on any social media looks suspicious in any way, close your browser or App, and do not return to that page.

## 10. Disciplinary action over social media and IM use

10.1 All employees are required to adhere to this policy. Employees should note that any breaches of this policy may lead to disciplinary action. Serious breaches of this policy, for example incidents of bullying of colleagues or social media activity that might cause serious damage to THH, may constitute gross misconduct and lead to summary dismissal.

10.2 Staff should be aware that THH may observe content and information made available by employees through social media or IM. Where this content is deemed to be in contravention of the Staff Code of Conduct, appropriate disciplinary action may be invoked.

## 11. Legal action

11.1 Employees are reminded that an individual who makes a defamatory statement that is published on the internet may be legally liable for any damage to the reputation of the individual concerned. A company can sue if a defamatory statement is made in connection with its business or trading reputation.

## 12. Political impartiality

12.1 As THH is a wholly-owned subsidiary of LBTH, many of its activities fall within the wider statutes and regulations governing the conduct of local authorities. Employees should therefore be mindful at all times – including when using social media and networking – about the permitted and prohibited use of THH resources.

12.2 “THH resources” refers to information, staff time, ICT resources, buildings, equipment and supplies; publicity and events.

12.3 THH’s resources must not be used for political purposes or to promote the electoral advantage of any candidate or political party. Therefore, THH staff must not carry out any activity which could give the impression that public resources are being used for party political purposes, or call into question their political impartiality. In relation to social media and networking, this means that:

12.3.1 THH staff should not introduce any corporate logos, branding, headed stationery and images into:

- communications of a non-THH business, commercial or personal nature;
- communications for party political purposes, e.g. in connection with fund raising for the benefit of a political party or candidate, advocating membership of a political party or supporting the return of any person to public office.

12.3.2 THH staff should not use THH resources (including working time and ICT networks) to engage with party political activity, electoral campaigning and canvassing.

12.3.3 THH staff should not use THH resources to publish material that, in whole or in part, appears to be designed to affect public support for a political party or candidate. In determining whether material falls within this prohibition, regard must be had to its content and style, the time and other circumstances of publication and the likely effect on those to whom it is directed, and in particular to:

- whether the material refers to a political party or candidate, or to persons identified with a political party or candidate;
- whether the material promotes or opposes a point of view on a question of political controversy which is identifiable as the view of one political party or candidate and not another; and
- where the material is part of a campaign, the effect which the campaign appears designed to achieve.

12.3.4 THH staff, where using corporate social media, must ensure that publicity is:

- relevant to THH’s responsibilities;
- objective and explanatory, not tendentious or polemical;
- not party political, or be liable to be misrepresented as being;
- conducted in an economic and appropriate way, having regard to the need to be able to justify the costs as expenditure of public funds; and
- aiming to inform, not to persuade, the public. Publicity about policies should be as objective as possible, concentrating on facts and explanation.

12.4 As a general rule, THH staff should direct all external communications activity to be cleared via the Communications team before publishing.

12.5 Additionally, THH staff should not indicate on social media, corporate or personal, that they are individually working on elections. Doing so risks opening yourself to allegations of corruption and bringing THH into disrepute.

### 13. Pre-election periods

13.1 Following the publication of a Notice of Election, the official pre-election period commences from this date and this has a number of additional implications for THH and its employees and workers in respect of social media and networking.

13.2 During the pre-election period, there will be heightened sensitivity around publicity, and therefore the following special rules apply:

#### 13.3 Publicity and events

The Code of Recommended Practice on Local Authority Publicity provides that “*local authorities should pay particular regard to the legislation governing publicity during the period of heightened sensitivity before elections [... ..]. It may be necessary to suspend the hosting of material produced by third parties, or to close public forums during this period to avoid breaching any legal restrictions. During the period between the notice of an election and the election itself, local authorities should not publish any publicity on controversial issues or report views or proposals in such a way that identifies them with any individual members or groups of members. Publicity relating to individuals involved in the election should not be published by local authorities during this period unless expressly authorised by or under statute. It is permissible for local authorities to publish factual information which identifies the names, wards and parties of candidates at elections. In general, local authorities should not issue any publicity which seeks to influence voters.*”

13.4 ‘Publicity’ is defined widely and may include events which provide a platform for any candidate at the election and/or where the subject matter is politically controversial or aligned to a particular party policy. This therefore includes activity on social media and in social networking.

13.5 Care must be taken to avoid publicity that may contravene the Code, such as publishing photographs of candidates who are standing for election, or of THH staff sharing a platform with Members that could indicate support for a particular party’s policy.

13.6 There should be a presumption against undertaking new publicity campaigns on any matter that might be considered controversial at the election. Ongoing publicity campaigns should be reviewed to assess whether they could be open to the criticism that they are being undertaken for political purposes; campaigns which are liable to be misrepresented as party political must be stopped until after the election.

#### 13.7 Press statements and conferences

The distinction between political and THH statements will be under very close scrutiny during the pre-election period. Therefore, care must be taken when public or press statements are made – including responses to residents via corporate social media accounts on Twitter, Facebook, etc.

13.8 Press releases and publications and the website should not mention, feature or quote any election candidate, nor should they mention, feature or quote any Member except a Member holding a key political or civil position commenting on an emergency or an important event outside of THH’s control where there is a genuine need for a Member level response.

13.9 In some circumstances it may be acceptable for THH to “put the record straight” if damaging misinformation has been circulated as part of a campaign or for any other reason. This will be an exceptional case and may arise, for example, where the inaccurate statements relate to race and may damage community relations. In such circumstances, THH is always under a duty to eliminate unlawful racial discrimination, promote equality of opportunity, and promote good relations between people of different racial groups.

13.10 Again, THH staff should direct all external communications activity to be cleared via the Communications team before publishing.

#### 13.11 Campaign material and unlawful election donations

Campaigning material or political posters must not be displayed via THH corporate social media, social networking or Enterprise Social Media channels. These may be deemed unlawful donations under the Political Parties, Elections and Referendums Act 2000, and/or corrupt practices under Section 75 of the Representation of the People Act 1983, with civil and criminal penalties.

#### 13.12 Third party events and community meetings

Events and publicity which are arranged by external organisations which are funded by THH, or which are arranged in partnership with THH, are covered by the restrictions in the same way as a THH-organised event, because any publicity arising from the event for a candidate would have been facilitated by THH resources. Additionally, such events or publicity are covered by the restrictions if they take place during the pre-election period, regardless of when the decision was taken to fund them.

#### 13.13 Impartiality of staff/canvassing

THH staff must not, in their professional capacity, take part in any publicity which could link THH to support for any party or candidate. Political posters or campaign material may not be displayed on any THH establishment, or a corporate or personal vehicle used for official business.

13.14 THH premises should not be used in any way to promote or signify support for any particular candidate or party. General photographs of the exterior of the premises from outside the site are permissible providing they are not used to indicate the view of THH or any staff or students. Photographs of THH staff should not be permitted without the prior consent of the Communications Manager.

### **14. Other general guidance**

14.1 The following are guidelines regarding what employees consider when publishing content in social media, corporate or personal, and in Enterprise Social Media. These apply to whether posting during or outside of work and working time, whether the content is related to THH business or not, and whether or not you post using personal ICT equipment. These guidelines only cover a sample of all possible content publishing scenarios and are not a substitute for good judgment, common sense and consideration for others.

- DO remember that staff members are responsible for content you publish in social media and can be held personally and even criminally liable for content published.
- DO know and follow all usual privacy and confidentiality guidelines.
- DO remember that laws such as copyright, fair use and financial disclosure laws apply to social media.
- DO remember that staff members can be subject to disciplinary action by THH for publishing inappropriate or confidential content.

- DO be aware of your association with THH in social media; if you identify yourself as an employee, ensure your profile and related content is consistent with how you wish to present yourself with colleagues and customers. Remember that if you use your personal account to like or share items posted on THH's corporate channels, the public may be able to locate your personal account and view your content and send you direct messages.
- DO be professional. If you have identified yourself as a THH employee within a social website, you are connected to your colleagues, managers and even THH tenants, residents and customers. You should ensure that content associated with you is consistent with your work at THH.
- DO use your best judgment; remember that there are always consequences to what you publish. If you're about to publish something that makes you even the slightest bit uncomfortable, review the suggestions above and think about why that is. If you're still unsure, and it is related to THH's business, feel free to discuss it with your manager, or simply do not publish it. You have sole responsibility for what you post to your blog or publish in any form of social media.
- DO NOT disclose or comment on confidential or proprietary information or that of any other person or company. For example, ask permission before posting someone's picture in a social network or publishing in a blog a conversation that was meant to be private.
- DO NOT cite or reference customers, partners or suppliers without their written approval.
- DO NOT use social media to publish ethnic slurs, personal insults, obscenity, offensive or defamatory messages, or engage in any conduct that would not be acceptable in THH workplace. You should also show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory.


**15. Monitoring, review and impact assessment**

15.1 People Services will review this policy on a regular basis to ensure it remains compliant with any employment legislation revisions and good employment practice.

15.2 The procedure has been subject to an impact assessment and no specific impact was identified in respect of any protected characteristic.

15.3 The procedure will be monitored and the results reported to EMT.

Further Information can be obtained from the People Services team.  
**Person responsible:** Head of People Services

<b>Board</b>  10 <sup>th</sup> December 2019	
<b>Report authorised by:</b> Paul Davey, Director of Business Transformation  <b>Report Author:</b> Sarah Pace Head of Business Development	<b>Report type:</b> For decision
<b>Outline Business Plan 2020 - 25</b>	

## 1. Introduction

- 1.1 Under the terms of the Management Agreement, between London Borough of Tower Hamlets and Tower Hamlets Homes, we are required to submit a draft Business Plan to the Client for comment by 31st December each year. A full and final version of the Business Plan must then be submitted for agreement on or before 31st March.
- 1.2 In launching our Business Plan, 'Working Together', in 2016 we committed to creating thriving, safe, and sustainable neighbourhoods where residents can be proud of their homes, respect one another and realise their potential. Alongside this vision, we embarked upon an ambitious transformation programme, designed to deliver services right first time in ways that customers can easily and conveniently access.
- 1.3 Over the period of the current Business Plan we have travelled a long way. Our track record of improvement is evident through independently conducted resident surveys which show overall satisfaction has increased by 6 percentage points and tenants' satisfaction is at an all-time high of 90%.

## 2. Recommendation:

- 2.1 That Board discuss and comment on the Outline Business Plan prior to its submission to the Client by 31<sup>st</sup> December 2019.

### 3. Context

3.1 Since adopting our current Business Plan the national and local and context in which we operate has changed significantly. Coupled with the agreed extension to the Management Agreement this calls for a new Business Plan to guide THH through the next five years and deliver against the strategic objectives of the Council.

3.2 The full Business Plan will take account of:

- new regulatory changes signalled in the Social Housing Green Paper
- findings from the Phase 1 Grenfell Tower Enquiry
- requirements of the new Building Safety Regulator
- financial targets as established by the Council
- any new areas of responsibility agreed with the Council

### 4. Organisational Priorities

4.1 The Business Plan in outline is presented as **Appendix 1**

4.2 Emerging priorities, informed by resident consultation and discussion with the Board, take account of the Councils Strategic Plan which has at its heart three priority outcomes:

- A borough that our residents are proud of and love to live in
- A dynamic outcomes-based council using digital innovation and partnership working to respond to the changing needs of our borough
- People are aspirational, independent and have equal access to opportunities

4.3 **Appendix 2** provides the emerging priorities for THH themed against the priority outcomes established by the Tower Hamlets Strategic Plan. In doing so, we have sought to demonstrate the contribution of THH and respond to the recommendation of the Altair review.

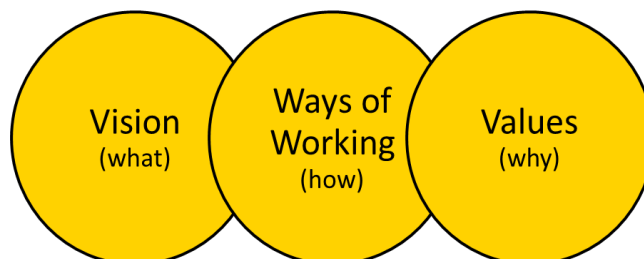
4.4 Consultation with residents commenced with TRA workshops to identify residents' priorities. To ensure a representative sample of views is taken account of, we have supplemented the workshops with an on-line survey and outreach consultation.

4.5 Board are requested to note that any further savings targets set by the Council are likely to impact on our ability to deliver across the full range services outlined. Should a further reduction in our management fee be made priorities will need to be reconsidered.



## 5, Organisational Culture

- 5.1 Staff are our biggest asset and instilling an organisational culture for successful delivery is imperative. Work, through our People Strategy, has been ongoing and we recognise there is still more we can do.
- 5.2 How we do things is every bit as important as what we do. The starting point for culture is a compelling vision that galvanises staff to work together for a common purpose and towards the same end goal.
- 5.3 Feedback from staff and to some extent residents, tells us that our current vision and mission statements, whilst relevant, are too unwieldy and for this reason we have started work to refresh them.
- 5.4 Alongside the refresh of our vision, work is underway to develop clear organisational values to help guide the behaviours of staff; acting as the compass to reassure we are heading in the right direction.
- 5.5 Our Vision, Ways of Working and Values need to fit into a single framework, which then guides the “what, how and why” of all we do.



- 5.6 The Outline Business Plan is presented as **Appendix 1**. It includes a ‘work in progress’ version of the vision and values.

## 6. Timetable

- 6.1 In broad terms, the full Business Plan provides information about:-
  - how we did in the previous year
  - the priorities we will focus on
  - what we will do in the coming year
  - the resources we have to deliver our plan.
  - the measures of success (business critical indicators (BCIs))



6.2 The table below outlines the tasks and timing of work required to complete the Business Plan

<b>Month</b>	<b>Task</b>
December 2019	<ul style="list-style-type: none"> <li>• Conclude resident consultation</li> <li>• Submit outline plan to Board for approval</li> <li>• Submit agreed outline plan to client for comment</li> </ul>
January 2020	<ul style="list-style-type: none"> <li>• Draft final Business Plan narrative</li> <li>• Finalise Vision &amp; Values</li> <li>• Members' Workshop</li> <li>• Develop draft objectives for 2020 – 2025 and annual service improve plan milestones</li> <li>• Work up BCI's and targets for recommendation</li> </ul>
February 2020	<ul style="list-style-type: none"> <li>• Reflect client feedback on outline plan within the final draft</li> <li>• Present draft Business Plan to Board for agreement</li> <li>• Commence team planning</li> </ul>
March 2020	<ul style="list-style-type: none"> <li>• Finalise document</li> <li>• Submit Business Plan to Client for approval</li> </ul>

## Appendix 1

# OUTLINE BUSINESS PLAN

## Vision

Great Homes, Quality Services, Thriving Communities

## Values

- **Be the best that we can be**  
Always looking to do better, delivering in a seamless way where customers don't see the join between different teams, meeting customer expectations by doing what we say we will
- **Everyone matters and everyone is responsible**  
Understanding the needs of customers and making service personal
- **Make life easier through collaboration**  
Keeping things simple in order to make it easier for customers to get what they need and staff to do a great job, keeping customers updated and not waiting for them to ask

## Ways of Working

- We put the customer first
- We work together
- We plan our work
- We take responsibility
- We find better ways to do things

## Emerging Priorities

### GREAT HOMES

**Safe homes and neighbourhoods:**

- maintain up to date fire risk assessments and deliver planned programme of fire safety and other building safety works
- listen and respond to residents on issues of safety
- work with partners to deter and tackle ASB

**Green and clean homes and neighbourhoods**

- maintain the highest standards of caretaking and gardening
- develop and deliver a sustainability strategy for and with residents
- invest strategically in neighbourhoods to improve their look and feel

**Maintained homes and neighbourhoods**

- robust contract management to ensure quality standards are met
- procure and mobilise high quality contractors
- thorough scheme consultation and transparent, accurate billing

### QUALITY SERVICES

**Modern value for money services**

- maximise availability of on-line services
- maximise provision for mobile working
- provision of affordable broadband for residents

**Right first time services**

- minimise potential for errors through system automation
- effective resolution and learning from complaints
- robust quality monitoring systems

**Inclusive and targeted services**

- choice of access to meet customer preference
- extra support for residents who need our help the most
- tailored service offer for leaseholders

### THRIVING COMMUNITIES

**Active and sustainable communities**

- support new and existing TRAs
- work with partners to increase financial, physical and mental wellbeing
- improve the management of sub-let stock

**Cohesive communities**

- foster residents understanding of and respect for one another
- invest in community projects

**New homes for communities**

- work with LBTH to increase the supply of affordable homes

Appendix 2:

Strategic Links

**LBTH Priority Outcome:**  
**A borough that our residents are proud of and love to live in**

**Safe homes and neighbourhoods:**

- maintain up to date fire risk assessments and deliver planned programme of fire safety and other building safety works
- listen and respond to residents on issues of safety
- work with partners to deter and tackle ASB

**Green and clean homes and neighbourhoods**

- maintain the highest standards of caretaking and gardening
- develop and deliver a sustainability strategy for and with residents
- invest strategically in neighbourhoods to improve their look and feel

**Maintain homes and neighbourhoods**

- robust contract management to ensure quality standards are met
- procure and mobilise high quality contractors
- thorough scheme consultation and transparent, accurate billing

**LBTH Priority Outcome:**  
**A dynamic outcomes-based council using digital innovation and partnership working to respond to the changing needs of our borough**

**Modern value for money services**

- maximise availability of on-line services
- maximise provision for mobile working
- provision of affordable broadband for residents

**Right first time services**

- minimise potential for errors through system automation
- effective resolution and learning from complaints
- robust quality monitoring systems

**Inclusive and targeted services**

- choice of access to meet customer preference
- extra support for residents who need our help the most
- tailored services offer for leaseholders

**LBTH Priority Outcome:**  
**People are aspirational, independent and have equal access to opportunities**

**Active and sustainable communities**


- support new and existing TRAs
- work with partners to increase financial, physical and mental wellbeing
- improve the management of sub-let stock

**Cohesive communities**

- foster residents understanding of and respect for one another
- invest in community projects

**New homes for communities**

- work with LBTH to increase the supply of affordable homes

<b>Board of Directors</b>	
10 <sup>th</sup> December 2019	
<b>Report authorised by:</b> Steve Philpott <b>Report author:</b> Erin Lawrence	<b>Report type:</b> For decision
<b>Title:</b> Domestic Abuse Staff Policy	

**1. Introduction**

Following the recommendations arising from the Domestic Abuse Housing Alliance (DAHA) Accreditation toolkit, we have devised a new policy for staff who are experiencing domestic abuse. This will be designated as an employee welfare policy.

The purpose of this paper is to obtain EMT agreement to implement the above policy.

**2. Recommendation**

To agree to implement the attached new policy with immediate effect.

**3. Summary of proposed policy**

This is a new policy recommended due to the development of work with DAHA and the review of domestic abuse policies within the organisation. It has drawn from LBTH’s own policy, and clearly outlines what staff should expect if they make a disclosure and what support can be offered. It also outlines advice for managers in dealing with a disclosure.

In line with this policy, training for People Services and Staff Domestic Abuse Champions will begin in the new year. This will provide confidence in staff that the correct support will be provided and the correct referrals will be made.

**4. Process undertaken so far**

A draft of the policy was circulated around SMT for comments, and any concerns/suggestions raised have been considered and, if appropriate, implemented.

**5. Equality Impact**

The attached policy has been considered from an equalities perspective. It is applicable to all staff and does not directly discriminate on the grounds of any protected characteristic. The policy is not felt to be indirectly discriminatory on the grounds of any protected characteristic.

In line with the requirements of the Public Sector Equality Duty, this policy has a focus on promoting equality as domestic abuse particularly affects women. This policy also acknowledges that domestic abuse can occur in same-sex relationships and so it is written inclusively in a way that can promote confidence in disclosing.

**6. Appendices**

- a) Domestic Abuse Policy



# Domestic Abuse

## November 2019

### 1. Policy objectives

1.1 THH is committed to supporting employees who are the victims of domestic violence (DV) or any other form of Violence Against Women and Girls (VAWG). It will take appropriate action against employees who are perpetrators of it and/or provide information about services that can help them with the aim of reducing risk and supporting change.

### 2. Scope and definitions

2.1 This policy applies to all employees of THH, including fixed-term, temporary and seconded staff, agency workers engaged by THH, THH Board members and co-optees, and also to other staff who may work for THH on a temporary or contract basis.

2.2 Domestic violence is any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are, or who have been, intimate partners or family members, regardless of gender or sexuality. It can include forced social isolation, or abuse inflicted upon or threatened to be inflicted upon children or other family members.

2.3 Most often, domestic violence is committed by men against women, but it also happens in gay, lesbian, bisexual and transgender relationships. It can also happen between family members ie; children, parents, grandparents and siblings. Sometimes women abuse men, and sometimes other family members may be involved.

2.4 VAWG is “any act of gender based violence that results in or is likely to result in physical, sexual or psychological harm or suffering to women [or girls], including threats of such acts, coercion or arbitrary deprivation of liberty’. These include **sexual violence, trafficking, prostitution, child sexual exploitation including in a gang context, female genital mutilation, forced marriage, so called ‘honour’ based violence, dowry related abuse, stalking and harassment.**

2.5 For the avoidance of doubt, this policy applies in all instances of domestic abuse, regardless of the sex, gender identity or sexual orientation of those affected/involved.

### 3. Status

3.1 This is a THH staff welfare procedure. Its provisions do not form part of the contract of employment and we reserve the right to vary or withdraw them unilaterally.

### 4. Summary of areas covered

4.1 Information about VAWG/domestic violence is unlikely to be disclosed easily by someone experiencing or committing it. An employer that is proactive in VAWG/tackling domestic violence may find that employees become more likely to disclose it. But often it may only be identified through monitoring of sickness, attendance and work performance.

4.2 Identification of VAWG/domestic violence at an early stage can lead to appropriate help and support being offered which can reduce prolonged or repeated suffering. It can help reduce sick absence and the resultant burden and stress on colleagues. Integration of the response to VAWG/domestic violence with policies around sickness management and work performance will help to avoid taking inappropriate action against staff.

4.3 Taking a proactive stance on domestic violence means developing consistency about supporting members of staff through their difficulties.

## 5. Responding Sensitively to Employees Experiencing Domestic Violence

5.1 Managers may be in the role of trying to encourage a member of staff to disclose VAWG/domestic violence, and in doing so they need to adopt a sensitive and non-judgemental approach. A member of staff may voluntarily or due to circumstances admit a situation at home because of the effect on their attendance at work, or the fact that they have come into work with visible injuries. They may well try to play down the situation or later deny what they have said, particularly if they feel that it may be held against them or there are concerns about the risk of significant harm to a child that a manager may have a duty to report.

5.2 Managers may find it helpful to consider:

- Ensuring privacy for any conversations about the issues, using an office or room where interruptions can be avoided.
- Respecting confidentiality.
- Being non-judgemental and sensitive.
- Understanding why someone might be reluctant to approach their line manager, and may involve a third party, such as a colleague or a Trade Union representative.
- Additional issues faced by women because of their ethnic background, age, sexuality, class etc., but not stereotyping or making assumptions based on this.
- Offering the option of speaking to a female or male member of staff where appropriate (it may be appropriate to involve People Services).
- Signposting in terms of legal rights, benefits, refuges, counselling, legal and welfare advice available through some Trade Unions and local services and how to access them. This can enable the member of staff to make their own choices and changes in their lives, and have a positive impact on their work and safety at work.
- Reassuring the person that what is said is kept confidential, explaining that actions will need to be taken if there is anything which may put the health and well-being of children at risk or where the victim is in danger of life threatening violence.
- How best THH can help and what other organisations may be of assistance.
- Suggesting that the employee can contact the Tower Hamlets domestic violence team for advice and guidance.

5.3 Managers may discuss referring the member of staff to Occupational Health, where counselling or other support may be recommended if appropriate, or that they self-refer to People Services in order to access the MIND Counselling Service, or that they directly approach the Employee Assistance Programme, which can offer telephone and face-to-face counselling on a confidential basis. Any referral to a different agency or another member of staff should include signed permission from the member of staff who has disclosed.

5.4 Staff who are absent from work due to domestic violence will be subject to THH's Sickness Absence Policy and managers are expected to use meetings to offer care and support to the member of staff. Managers should consider personal circumstances when

managing an employee's sickness absence and ensure that THH discharges its responsibilities in such cases. Managers should refer to THH's guidance/policy documents and seek advice from their HR Business Partner.

5.5 Perpetrators of VAWG/domestic violence may, on occasions, make allegations against employees, including the victim, with a view to THH initiating disciplinary action. Accordingly managers should be mindful that this could be a deliberate strategy to inflict harm and that more detailed informal enquiries may be required before considering whether to initiate disciplinary action.

5.6 THH recognises the impact of VAWG/domestic violence on an employee's abilities to carry out their duties, attend work regularly and maintain good working relationships with colleagues. THH fully accepts its responsibility to safeguard the individual as well as fellow employees.

5.7 THH will ensure that members of the People's Services team and a network of Staff Champions are trained in order to support managers in dealing with disclosures and making the right referrals.

## 6. Practical Measures to Consider With the Employee at Risk

6.1 THH is committed to ensuring that practical support is made available, subject to the needs of the service and encourages managers to adopt a sensitive, flexible and pragmatic approach to meeting the needs of workers in accordance with their individual circumstances.

6.2 Managers should carry out a risk assessment with the worker, and discuss the risks faced by them and any practicalities or changes that might be appropriate to manage the risks. For example:

- Temporary changes in workplace, work times and patterns can reduce the level of risk for the worker at work and on their journeys to and from the workplace.
- Specific duties, such as answering phones, working in isolated situations or staff reception areas, and undertaking duties that would put the worker at a higher risk of injury, may be changed to mitigate risk.
- Short-term help, such as accompanying them to the bus stop, phoning to check that they arrived home safely, etc, can support the worker and help manage risks.
- Discussion of how to handle contact with the perpetrator, agreeing – with the consent of the victim – what to tell colleagues (if anything), can help to manage risk. It may be helpful for the worker and/or their colleagues to know how they should respond if the perpetrator rings or calls at the workplace, and how to alert colleagues of a problem, etc.
- Redeployment to another role may be appropriate risk mitigation. Seek advice from your HR Business Partner about this issue.
- Ensuring that the worker is aware of external sources of advice and support.
- Where the worker is an employee, ensuring they are aware of THH's Employee Assistance Programme.
- Where the worker is an employee, referring them to Occupational Health.
- Where the worker is an employee, referring them to the MIND Counselling Service (via People Services).
- Where the worker is an employee, considering any needs for Special Leave. Seek advice from your HR Business Partner about this issue.

6.3 Where an alleged perpetrator is employed by THH, your HR Business Partner should be informed to allow consideration of HR action (including disciplinary action potentially resulting in dismissal) in respect of the alleged perpetrator. **However, under no**



**circumstances should managers attempt to mediate between parties or discuss the disclosure with the alleged perpetrator.** There are organisations that can support perpetrators in addressing their behaviour that THH can signpost too ie; Respect.

6.4 If the victim and perpetrator are both employees of THH, appropriate steps will be taken to manage any immediate risk that may be present, which could involve following any of the above guidance.

6.5 If both parties report to be victims and are accusing each other of being perpetrators, each case should be dealt with separately, and all allegations will be treated in line with the staff code of conduct and disciplinary procedures, but will be done so with sensitivity. Again, there should be no attempt at mediation between the two parties.

6.6 It is important to note that this document only acts as guidance and each case should be dealt with on a case by case basis.

**7. General Safety Issues**

7.1 Managers should ensure that all staff are aware that personal information should not be given to anyone phoning or visiting the workplace.

7.2 Managers should regularly review whether security measures, such as keypads or access procedures, need to be changed in case the access codes have become known.

7.3 Managers should be mindful to note and record where staff are located during the day, particularly if work duties include spending a lot of time out of the workplace.

**8. Further information**

**Internal Support:**

- Employee Assistance Programme (24hr, free and confidential) 0800 015 7287
- Your manager (including referrals to Occupational Health to access counselling)
- People Services (including referrals to the MIND counselling service)
- Trade unions (GMB, Unison, Unite)

**External Support Agencies:**

- Police (Non-emergency) 101
- National Domestic Violence Helpline (24hr) 0808 2000 247
- Victim Support Tower Hamlets 020 7364 2448 / 7957
- Child Protection Advice Line (10am – 1pm) 020 7364 3444
- Early Help Hub (concerns regarding children) 020 7364 5744
- East London Rape Crisis 0800 160 1036
- LBTH Emergency Duty Team (Out of Hours Service) 020 7364 7070
- LBTH Housing Options 020 7364 7474
- LBTH VAWG, Domestic Abuse and Hate Crime Team 0800 279 5434 or via email on [domestic.violence@towerhamlets.gov.uk](mailto:domestic.violence@towerhamlets.gov.uk)
- Men’s Advice Line 0808 801 0327
- National LGBT Domestic Abuse Helpline 0800 999 5428
- NSPCC Child Protection Line 0808 800 5000
- Reset (Drugs & Alcohol Services) 020 8121 5301

- Respect (Help for Perpetrators) 0808 802 4040
- Rights of Women (Legal Advice) 020 7608 1137
- Shelter London Advice Service 0344 515 1540
- The Havens (Rape & Sexual Assault) 020 3299 6900
- Women's Trust (Counselling) 020 7034 0303
- Tower Hamlets Domestic Violence  
One Stop Shop  
Idea Store, 321 Whitechapel Road, London E1 1BU  
(Thursdays only, 9.30 am – 12.30pm) 020 7364 4986

**In an emergency, call 999 for police or ambulance services**

### **9. Monitoring, review and impact assessment**


9.1 People Services will review this policy on a regular basis to ensure it remains compliant with any employment legislation revisions and good employment practice.

9.2 The procedure has been subject to an impact assessment and no specific impact was identified in respect of any protected characteristic.

9.3 The procedure will be monitored and the results reported to EMT.

Further Information can be obtained from the People Services team.

**Person responsible:** Head of People Services

<p><b>Board of Directors</b></p> <p>10<sup>th</sup> December 2019</p>	
<p><b>Report authorised by:</b> Susmita Sen - CEO</p> <p><b>Report Author:</b> Paul Davey – Director of Business Transformation</p>	<p><b>Report type:</b></p> <p>For information</p>
<p><b>Title:</b> CEO Report</p>	

**1. Introduction**

This report provides the Board with an update on THH's Vision, Mission and Values following our away day, updates from Asset Management, Neighbourhoods and Business Transformation as well as short briefings on the management agreement, meetings with Members, Board Director recruitment, New Build, Grenfell Inquiry Phase 1 recommendations and our usual performance report.

**2. Recommendation**

2.1 That Board Directors note the contents of this report

**3. Vision, Mission and Values**

As you will recall at the recent Board away day there was some preliminary discussion about a renewal of THH's Vision, Mission and Values as part of our post management agreement extension renewal strategy and in tandem with development of our new Business Plan 2020-25.

As part of this process we will also be revisiting the People Strategy so that all of these strands come together in a closer alignment that will be more easily understood by staff and, together, will promote the changes to staff culture which have started but which we need to progress further.

To assist us in this process we asked David Whelpton of Broadgate to critique our current Vision, Mission and Values and, using input from residents from our recent roadshows and the Board at the away day, has put forward suggestions that develop our original ideas.

Whilst some of the wording needs more work the linkages between these elements feels much clearer and, I think, more memorable and cohesive for staff.

**Vision – (using the power of 3)**  
Great Homes, Quality Services, Thriving Communities

**Mission - to feed into the vision**

- **Great Homes**
  - Repairing, maintaining and improving our properties to a good standard
  - Providing safe and secure places to live
  - Taking care of the local environment
- **Quality Services**
  - Responding sensitively to the needs of our residents
  - Communicating effectively with residents and being open and honest
  - Collecting rent and service charges efficiently to fund the services that are needed
- **Thriving Communities**
  - Delivering well-managed neighbourhoods where people are proud to live
  - Working with local communities on what matters to them
  - Supporting residents to help them flourish

10

**Values – our compass**

Be the best **that we can be**

Everyone matters **and everyone is responsible**

Making life easier **through collaboration**

With regard to our Vision, a modification has been suggested to that above.

**Great Homes, Great Services, Great Communities**

## 4. Neighbourhood Services Update

### 4.1 Traffic Management Order (TMO) Roll Out

#### Wapping

The Statutory Stage of the TMO is underway with the actual consultation planned for an extended period over Christmas. Assuming there are no serious objections and that works can be programmed, final implementation is expected in March. Where there is parking capacity, expressions of interest have been sought from residents who live on an estate as to whether they want a permit. This is in line with our commitment to allow residents to apply for spare spaces on each scheme. In terms of the 42 non-residents who currently rent spaces (many of whom live in car free accommodation), it is likely that a significant number of those can be accommodated albeit at a greater distance from home.

#### Shadwell

The first stage ballot is complete with 28 in favour of the scheme and two against. A report is with LBTH Parking Services seeking permission to go ahead with Stage 2. Given there are no reasons for objecting to the scheme, work has already begun on Stage 2 of the process with the aim of beginning the Statutory Stage in early January.

Controversial public facing activity has been paused until after the election to avoid possible issues with regards to purdah. A larger scale first stage consultation will therefore take place on the following estates; Martineau, Solander Gardens, Ring House, Pitsea, Royal Mint and Berners Estate. A consultation will also take place on the Boundary Estate to support the Council's initiative to tighten up on illegal parking in this area.

We are also using a Traffic Engineer employed through Parking Services and to discontinue the use of consultancy services used by PCL, This is due to cost and effectiveness of performance.

### 4.2 Estate Services Review

The caretakers have now started carrying out monthly Fire Safety checks of the communal areas of our blocks. So far they have completed over 1800 inspections and the main issues they are reporting are:

- Missing hopper seals
- Items stored in communal areas such as bikes and plant pots
- Evidence of smoking in communal areas

We are currently interviewing for the 21 vacant caretaking posts and the Lead Gardener and other gardener posts have been successfully recruited. We are aiming for a start date of 2nd January 2020 for the Response team to go live, with recruitment to the Response Team Manager and Team Leader posts to take place in January.

### 4.3 National Federation of ALMOs Managing to Make a Difference Publication

Following a visit from the NFA a few months ago some of our work features in their best practice briefing, 'Managing to Make a Difference'. The publication draws on the frontline housing management experiences of 31 NFA members, and shares both the challenges and

Page | 3

innovations within the sector. The research is based on a full survey of members, followed up with in-depth case studies at five ALMOs: Stockport Homes, Nottingham City Homes, Poole Housing Partnership, St Leger Homes of Doncaster and Tower Hamlets Homes.

The research finds that housing management is becoming ever more complex, largely because of the impact of austerity policies. ALMOs are responding to this complexity with innovation – focusing on people rather than processes; reviewing structures and ways of working; using resident feedback effectively; and using data and technology to make resources go further.

Ann Otesanya and Nick Spenceley were also asked to present at the NFA Board Members Event on 27/11/19 outlining the work we have been doing in partnership with the Police, Parkguard, LBTH and Streets of Growth.

#### **4.4 Continuing to strengthen our Safeguarding work**

The Head of NHDs and the Safeguarding co-ordinator recently met with the Chair of the Board and other Board Directors to review the draft business-wide THH safeguarding action plan. Very useful feedback was provided particularly around strengthening our approach to cultural sensitivity and setting clear milestones. The plan is currently being revised to take account of these comments. The group will meet again in the New Year and a year-end report on this area of work will be presented to Board early in the new financial year.

#### **4.5 Sixteen Days of Activism**

Again we have been supporting the White Ribbon campaign, the international movement to end male violence towards women.

It started with White Ribbon day on 25 November, followed by 16 days of activism to raise money and awareness to end gender-based violence.

We have been running a host of events and workshops at THH during the two weeks with specialist providers. These include:

- A workshop led by LBTH's Sanctuary Scheme Coordinator to talk about the benefits of the scheme and when and how to make referrals. Sanctuary Scheme is a free service offered to survivors of domestic abuse who need to make their properties more secure and safe.
- Surviving Economic Abuse Workshop –Surviving Economic Abuse is the only UK charity dedicated to raising awareness and transforming responses to economic abuse. The session touched on how to recognise signs of financial abuse and how to offer support.
- National Centre for Domestic Violence workshop on emergency injunctions. This session focused on the use of emergency injunctions and how we as professionals can support a survivor to get an injunction to provide protection against domestic violence.
- THH are going for the Domestic Abuse Housing Alliance Accreditation. This workshop went through the process of accreditation and will explain what this means for the organisation.

## 5. Asset Management Update

### Repairs Service

Overall Repair performance indicators are on track to be achieved in 2019/20 and efforts are being made where indicators are off target.

BCI's Satisfaction with repair (92.5%), Non-Emergency orders completed on time (98.6%), % Properties with a valid landlord's gas safety certificate (100%) are all on target.

% Appointments kept (94.2%) and Emergencies completed in time (98.4%) are slightly off target with actions out in place to address the decline and bring performance back in line with the target.

An action plan and new initiatives has been agreed with HPU, Housing Repairs and Mears to improve the turnover of void properties.

Actions have also been put in place to improve the 19/20 outturn of the 'Right First Time' indicator which is 1% off target.

We continue to monitor Mears Performance Improvement Plan, which was implemented in May, and have more recently also introduced a similar Improvement plan for Openview, to address some recent issues which arose relating to their contract.

### Better Neighbourhoods Programme

Works are progressing well, with the first phase of mobilisation of the LCP programme now completed. Works are onsite or are about to start imminently on 35 blocks. This includes the second phase of the LCP. The Pre-start meetings have been held with a new contractor, Cosmur Construction, ahead of fire safety works starting on eight blocks. Due to delays with procurement, the remaining LCP works scheduled to start in 2019/20 have been deferred to later programme years.

The Mechanical and Electrical programme has been unaffected by the delays seen with the LCP framework. There are a total of 56 projects in the 2019/20 financial year. Eleven have been completed, 24 are currently onsite, 13 are close to mobilisation on site and eight are currently undergoing S20 consultation.

With regard to resident satisfaction, there have been 446 respondents to the satisfaction surveys carried out by Kwest Research (up to 31st October) with a majority of responses being positive. Experience of works has a 92.5% satisfaction rate (tenants & leaseholders combined) and standard of the works carried out sits at 90.7%. Performance is significantly above the target of 80%.

## 6. Business Transformation Update

### 6.1 Community Investment

The community partnership team have been further developing and enhancing the community investment offer to our residents with a number of new initiatives.

### Employability Programme

Running alongside our existing commissioned employability programme with Go-Train, we have commissioned East London Business Alliance (ELBA) to support even more of our residents into work. As part of an embedded programme, a project manager from ELBA will co-locate one day a week at the financial health centre and work with partners there to support our residents into employment with some of their corporate sectors partners. The programme will support at least 50 additional residents into work and provide a range of training and work experience placements for other residents.

### **Reducing Social Isolation/Loneliness**

We have commissioned Neighbours in Poplar and East London Cares to help reduce loneliness and isolation amongst our residents which is becoming a major issue with an ageing population as well as reduction in council and other services. The aim of the programme is to improve the integration of people into the changing society, as well as increase the level of confidence, sense of belonging and remove cultural divisions. East London Cares will be working in targeted estates in the north of the borough such as Dorset, Newling and Virginia estate. Neighbours in Poplar will be working in estates in the south such as Wapping, Ocean, Roche, Birchfield and Barleymow.

### **Youth Engagement and Development Programme**

Over the summer holidays we commissioned six youth organisations to deliver a range of activities on our estates as part of a detached youth work programme, that placed youth workers out on to our estates to deliver a range of activities ranging from multi-sports, arts and crafts, fun days and day trips. Over 750 young people were engaged in the programme and the feedback from the young people and some of our TRAs has been really positive.

We are now rolling out a two year detached youth work programme, similar to that which we delivered over summer, which we are in the commissioning phase with a view to it starting in the new year, which will place youth workers on our estates throughout the year, developing relations with young people, delivering activities in the estates and helping them access other services, all with a view to keeping them active and engaged in positive activities and away from crime and ASB.

### **Inspiring Communities Fund**

The latest round of the Inspiring Communities Fund, which is our small grants programme, provided 11 TRAs and small groups with a total of £14,956.04 of grants to deliver a range of activities on our estates. The projects funded ranged from delivery of mental health workshops, exercise to sewing classes.

Total annual budget across the three rounds of the fund is £75,000 for 2019-20. In the previous round (10) we awarded grants worth a total of £11,735.49. The next round opens on the 10<sup>th</sup> January.

## **6.2 Customer Access and Experience Programme**

The Customer Access and Experience programme is continuing to focus on introducing new systems, processes and ways of working to deliver customer-focused services. There are currently 12 live projects and three are highlighted in this section.

Firstly, as a result of the leaseholder subletting project 17% of leaseholders (1,639) are now registered as subletting. This is a 13% increase since the start of the project and means that THH now holds details on the occupants of these properties, which is particularly important

Page | 6



in view of Grenfell. Leaseholders are required to re-register each time they issue a new tenancy. The second batch of 2,500 letters has been sent to leaseholders who are suspected to be subletting and this should result in an increase in the percentage of known sublets.

The second project to highlight is the environmental services project. The caretakers have now started carrying out Fire Safety Inspections of the communal areas of our blocks. So far, they have completed over 1,800 inspections since July 2019 and the main issues they are reporting are:

- Missing hopper seals
- Items stored in communal areas (e.g. bikes and plant pots)
- Evidence of smoking in communal areas

Repair orders have been raised where appropriate and the information regarding potential tenancy breaches has been passed to the Neighbourhood teams for action. The other part of this project is to merge the drainage and the support teams to provide more cover to respond to problems outside of office hours. The outstanding issues raised by the trade unions have been dealt with and steps are being taken to introduce the new working arrangements from January 2020.

The third is the Institute of Customer Service project, which includes the relaunch of the Ways of Working (Excellence Competency Model) using posters, leaflets and cards to reinforce key customer service excellence messages. In recent weeks, managers have been holding briefings on the Ways of Working (WoWs) with their teams. The results of the staff survey carried out in October 2019 show that the work being done to embed a culture of customer service excellence is having an impact. There were 235 responses to the survey and the overall score based on the average ratings from staff was 76.1 out of 100. This is a good increase compared to the figure of 66.9 in 2018 and is also above the Institute of Customer Service public services benchmark of 72.3. The percentage of staff who were satisfied with THH as an employer also significantly increased to 72.7% in the October 2019 survey compared to 57.0% in September 2018.

### **6.3 Diversity training**

As part of our ongoing commitment to inclusion, between October and January all THH employees will receive fresh equality and diversity training. This training is being delivered in three phases by the Housing Diversity Network; the first phase is focused on caretaking and estate services staff, the second on office-based staff, and the third for managers. The first stage has now completed, with over 220 staff having attended the sessions; feedback on these sessions has been positive, and attendance rates have been high. The second phase is now getting underway, with a pilot session held to ensure that the training is pitched correctly for the audience before the main rollout, which started on 27<sup>th</sup> November. The final phase will commence early in the New Year. The training resonates strongly with our proposed corporate Value of 'everybody matters and everyone is responsible' and will help us ensure that equality and inclusion is central in everything we do.

## **7. Management Agreement**

Some delays in progressing development of the new management agreement have been experienced. At the time of writing LBTH representatives are reviewing two versions of the management agreement and working towards a jointly agreed version that can be put to the steering group that is overseeing this project.

## 8. Meetings with Members

Shortly after the Cabinet decision was taken to extend the management agreement between LBTH and THH I wrote to all Members inviting them to meet me and other directors for discussions about the THH service so that their comments, suggestions and aspirations could be factored into the business planning process. It also felt timely just to get together with as many of them as possible so that we could explain our approach and the changes and improvement we are making to the services that their constituents receive.

Many Members have taken up this invitation and it has been very interesting and helpful to hear their strategic views on, for instance, services we could offer to young people and to our approach to diversity as well as local concerns such as leaks, the repairs service and our offer to leaseholders.

For me these meetings are an essential reality check about, on the one hand progress we are making and which Members recognise, but also those areas where we still have not cracked it and where we have much to do.

My feeling is that most Members appreciate being asked and I will continue to ensure as close a relationship to Members as we can achieve.

## 9. Asset Management Task Force/Customer Experience Task Force

The Asset Management Task Force (AMTF) has now met four times since June and will meet monthly going forward. Although the AMTF includes Board Directors, like the Customer Experience Task Force, it is not a decision making body.

The areas discussed to date have been the procurement of the repairs contract, the capital programme and the Asset Management Strategy (AMS). The first two meetings focused on both the Better Neighbourhoods programme and procurement of the repairs contract. It was subsequently decided that for future meetings one subject area would be discussed in detail and a second one more briefly if time allowed.

Asset management strategies were discussed at the October meeting. This involved looking at other organisations and also ideas for the AMS.

The draft review of the Better Neighbourhoods programme was covered in November, including works prioritisation. The AMTF meetings give the opportunity to Board Directors to share their views and help influence key asset related tasks that are being undertaken by THH at an early stage.

The Better Neighbourhoods programme, like any big capital programme, also involves much interaction between THH, contractors and residents. To monitor and guide this through the early stages of the programme, including deep dives into projects that go well and those where there are challenges, Customer Experience Task Force is being given over to these issues over the next few months to ensure we learn lessons and get these projects right. A special emphasis will be the leaseholder experience of works and improvements recommended through the Leasehold Services review.

## 10. Grenfell Inquiry Phase 1 – Update

The public inquiry into the fire at Grenfell Tower on the 14<sup>th</sup> June 2017, chaired by Sir Martin Moore-Bick is divided into two phases. This update looks at the report on phase 1, which took place between September 2017 and December 2018 and was published in October.

Page | 8

Phase 1 mainly focused on the background to the fire in 2017 and events that took place on the night of the fire. The report makes 21 recommendations covering the information made available to the fire brigade, the availability of plans for high-rise buildings and the evacuation of the tower.

On 11<sup>th</sup> November the Local Government Information Unit published a helpful summary of the Phase 1 report. This is attached as appendix 3 to this report.

The recommendations are being considered by the industry and have yet to be legislated. Whilst there is much support, the delivery of the recommendations is being reviewed. The LFB for example state that the recommendations will have a wide reaching impact not only on the LFB, but also on the fire service nationally. A response to the Inquiry will come from the National Fire Chiefs Council, presented to the GLA and disseminated to all stakeholders – there is no timescale for this yet. In the meantime, the LFB will not be issuing a position statement or discussing previous advice where this is in conflict to the recommendations (e.g. plans, resident information, on-site storage boxes).

## 11. Board recruitment

Following the recent resignation of a Board Director, THH now has three vacancies on the Board. These comprise one leaseholder, one tenant and one for an Independent Board Member.

We are almost there with getting Mahbub formally appointed. The last update from LBTH was in early November to advise that it was now with their legal team. The last stage is a recommendation to the Mayor from LBTH and if all is well we can appoint Mahbub at that time.

In regards to the Independent Board Member recruitment, we received bids from two agencies to support us with the recruitment process. Badenoch and Clark were successful in their bid and, at the time of writing, Ann Lucas and I are due to meet them to start the shortlisting process with a view to interviewing candidates from the beginning of December. We are hope to appoint early in the New Year.

We have had less luck with advertising for the resident Board Director vacancies and will now look into head hunting via the Resident's Panel to try and fill these vacancies.

## 12. Performance

Performance to October 2019 relates to 17 Business Critical Indicators [BCIs] agreed with the Council, and 26 additional indicators selected by the Board. The latter includes a number of measures reflecting the focus on Fire Safety, Communal Repairs, ASB and MyTHH.

Year-to-date targets are being achieved for 9 of the 17 BCIs with a further 4 close to target. Overall of the additional indicators selected by the Board, 22 are at or very close to target with 4 missing target at this stage of the year. Areas of strong performance include:

- Rent and service charge collection
- Gas servicing
- Housing Service Centre
- Recovery of homes from unauthorised occupation
- Caretaking
- Major works [resident satisfaction and programme delivery]

Page | 9

- Complaints and Members Enquiries

The detail by individual indicator is shown in Appendices 1 and 2 to this report.

Overall 8 of the 43 indicators are currently 'red':

### Long term re-lets

Between April and October 2019, there were 56 long term re-lets, of which 33 were out of target. Reasons for delay include: viewing refusals; delays with raising orders, post inspections or variations; and delays with void works particularly around asbestos removal and meter debt delays. This analysis and recovery actions have been discussed with Mears and revised work turnaround targets agreed.

### Unique visits to MyTHH

As previously reported, MyTHH currently has limited functionality so residents only log in infrequently for example to check their account balances. The upgrade to Housing Online will be delivered as part of the migration of Northgate to the NPS Cloud probably in Quarter 3. The development of online repairs ordering via InterFinder and enabling the detailed view of leaseholder invoices will encourage more frequent use of MyTHH.

### Parking calls

Performance met target in Quarter 2 but the year to date position is below target though the number of calls is significantly lower than at the same point last year. A significant proportion of the calls relate to the current lack of enforcement rather than applications for parking spaces.

THH is working with LBTH to introduce an on-line self-service parking application system which will significantly reduce calls made via the HSC. This will be phased in with the roll out of Traffic Management Orders over the next two years.

### Satisfaction with ASB handling

Performance on this measure improved in the second quarter compared to the first. ASB officers are continuing to call residents before closing cases and case closures are reviewed by the ASB manager. Analysis of the Kwest survey results is completed monthly to see if there are any patterns or trends for the satisfaction/dissatisfaction. It is proposed to send closed cases to Kwest twice a month rather than just at month end to facilitate more recent feedback. A review with Neighbourhoods of the ASB/NHO Comino process is underway and this should speed up the handling of some cases.

### Major Works invoices issued

Two temporary Quantity Surveyors have been appointed within Property Services to review and sign-off the historic Decent Homes final accounts for leaseholder billing. Property Services submitted 30 schemes to Leasehold Services in Quarter 2. Leasehold Services were only able to send 20 out based on the number of billable schemes and time constraints as officers were busy in September preparing for the actuals. We aim to have all outstanding invoices issued by the end of the financial year as opposed to the calendar year which was the original target.

### Fire risk reduction

Page | 10

The nine high-rise blocks that THH manages have a fire risk assessment rating of 'high'. The aim of the indicator is to reduce that risk to 'tolerable'. Works to the blocks are being carried out, and a compliant front entrance door [FED] has now been sourced. The indicator will remain 'red' however, as the issue of leaseholders' FEDs remains to be resolved.

### Void rent loss

Void rent loss remains above target partly due to the increase in re-let times and partly to the Dickinson House fire-damaged voids. Measures to improve turnaround performance are set out in the commentary on the relets. Remedial works at Dickinson House have now been completed and the properties handed back for re-occupation. Just two of the original occupants will be moving back into the block; the remaining properties are being advertised prior to re-letting. At 0.48% performance on this indicator remains at upper quartile.

### Sickness

This indicator measures sickness over a rolling 12-month period. This is rising as the low levels we experienced in the first two quarters of 2018-19 are being replaced with higher levels in 2019-20. This has been driven to a large extent by an upturn in surgery-related absence, which has outstripped the decrease in the level of musculoskeletal and, to some extent, stress-related absence. We are proactively managing longstanding sickness cases, and from mid-November have been offering staff this season's flu jabs in order to avert a peak of absence related to seasonal flus and colds.

### 13. Door Entry Systems – Leaseholder charges

Board Directors will recall a discussion at Board earlier in 2019 regarding Door Entry Systems when Board Directors asked whether LBTH could cap the cost of these works for leaseholders. This is especially where in small blocks there are fewer leaseholders to pay their share of the cost even though the DES costs are the same as for a large block.

This request was raised with the LBTH client who declined to agree a cap for these charges to leaseholders. Should the Board wish to take this request further it was advised that the Chair of the Board should write to Mayor John Biggs.

## Tower Hamlets Homes Key Monthly Performance Indicators

Year to date performance: October 2019					●	At or above target	
					●	Below target, above minimum	
					●	Below target, below minimum	
KPI Name	Target YTD	Minimum Score <sup>1</sup>	YTD	TREND <sup>2</sup>	PREVIOUS YEAR		
					YTD Oct 2018	Year on Year Trend	Out-turn 18/19
<b>Customers</b>							
1 % of calls answered	92%	87.4%	90.9%	▼	85.5%	▲	90.8%
2 % of Complaints responded to in target STAGE 1 ONLY	95%	90.3%	95.8%	▼	95.6%	▲	93.7%
3 Complaints Escalation: % of Complaints Upheld at Stage 2	10%	10.5%	5.8%	▼		▲	
<b>Homes &amp; Neighbourhoods</b>							
4 Repairs: Appointments kept	95.0%	90.3%	94.3%	▲	94.6%	▼	93.5%
5 % of properties with a current gas safety certificate	100%	100%	100%	◀▶	100.0%	◀▶	99.97%
6 Repairs: Emergency repairs in target	98.5%	93.6%	98.4%	▼	98.2%	▲	97.7%
7 Repairs: Non-emergency repairs in target	98.5%	93.6%	98.6%	▼	99.3%	▼	98.3%
8 % of repairs completed right first time	83%	78.9%	82.0%	▲	77.3%	▲	81.5%
9 % of tenants rating the repairs service as excellent, good or fair	92%	87.4%	91.5%	▼	87.5%	▲	88.7%
10 Unauthorised Occupancy: Homes Recovered	31	29	32	▼	27	▲	43
<b>Organisational</b>							
11 Average time to relet empty homes - Short term (days)	22	23.1	22.6	▲	27	▲	21
12 Average time to relet empty homes - Long term (days)	35	36.8	44.8	▼	29	▼	36
13 % rent collected (of rent due)	100%	99.0%	101.8%	▼	103.0%	▼	99.1%
14 Current arrears as % of rent roll	5.30%	5.33%	4.5%	▲	4.5%	▲	4.3%
15 % of Members' Enquiries responded to in target	90%	85.5%	91.6%	▼	87.8%	▲	90.4%
16 Service charge collected	100%*	99%	107.0%	▲	91.9%	▲	91.9%
17 Major works charge collected	100%**	95%	139.4%	▲	103.2%	▲	116.4%

## Notes

1 Minimum Score: Lowest value to avoid indicator showing 'red'      2 TREND: Compared to previous month

\* The target for Service Charge Collection is £15.75m which means that the performance target for each month is therefore 100% of the projected collection figure for that month.

\*\* The target for Major Works Charge Collection is £5.3m which means that the performance target for each month is therefore 100% of the projected



**Business Critical Indicators & Key Service Indicators**  
**QUARTERLY INDICATORS**

Q

September 2019

		Target YTD	Minimum Score	YTD	TREND	PREVIOUS YEAR			
						YTD Sep 2018	Year on Year Trend	Out-turn 18/19	
<b>Customers</b>									
1	Percentage of residents rating the HSC as excellent, good, or fair	BCI	92%	87%	93.0%	▲	91.39%	▲	90.4%
2	Percentage of residents agreeing with the statement 'THH does what it says it will do'	BCI	82%	78%	82.0%	▲	79.9%	▲	80.6%
3	Overall Satisfaction: Tenants	BCI	89%	85%	90.0%	▲	90.1%	▼	88.5%
4	Overall Satisfaction: Leaseholders	BCI	73%	69%	71.7%	▲	74.8%	▼	69.8%
5	No. of MyTHH Registrations		4,752	4,514	5,133	▲			
6	No. of unique MyTHH visits as a % of residents registered		50%	48%	38.1%	▼	43.5%	▼	45.2%
7	Reduction in the number of telephone calls about parking		1,180	1,239	1,284	▲			
<b>Homes &amp; Neighbourhoods</b>									
8	Satisfaction With Caretaking	BCI	86%	82%	88.0%	▲	87.7%	▲	86.0%
8a	Satisfaction With Caretaking : Tenants		86%	82%	89.1%	▲	90.2%	▼	89.0%
8b	Satisfaction With Caretaking : Leaseholders		86%	82%	85.6%	▼	81.6%	▲	78.1%
9	% of residents satisfied with the service provided by the caretaker		92%	87%	89.2%	▼	92.3%	▼	93.4%
10	% of residents satisfied with the neighbourhood		88%	84%	86.1%		86.3%	▼	85.1%
11	ASB: % of cases successfully resolved		95%	90%	98.9%	▲	95.3%	▲	90.9%
12	ASB: % of residents satisfied with handling of ASB		55%	52%	46.1%	▲	37.5%	▲	44.9%
13	Reduction in the number of telephone calls about repairs		49,800	52,290	50,605	◀			
14	% of communal repairs completed right first time		80%	76%	85.7%	▼	86.8%	▼	85.1%
15	Major Works Programme Delivery	BCI	86%	82%	109.3%	▲	291.8%	▼	89.4%
16	Major Works Invoices Issued	BCI	60	57	40	▲	50.0%	▲	67.5%
17	Percentage of residents rating capital works as excellent, good or fair	BCI	80%	76%	92.6%	▼	78.8%	▲	85.2%
18	% of 9 High-rise blocks with Fire Risk Reduction to Tolerable works completed	BCI	9	9	0				
19	% of eligible blocks with an up to date Fire Risk Assessment in place		100%	95%	100%	▶	100%	◀	#N/A
20	% of contractor schemes subject to additional health & safety monitoring		0%	0%	14.3%	▼			
<b>Organisational</b>									
21	Void Rent Loss as % of Rent Due	BCI	0.4%	0.42%	0.48%	▼	0.3%	▼	0.4%
22	% of managers trained in health & safety		100%	95%	99%	▼	22.4%	▲	98.3%
23	People Strategy: Staff positively rating "Residents are at the heart of what we do"		90%	86%	94.3%	▲	89.4%	▲	92.0%
24	Average Days Staff Sickness		8.0	8.40	11.1	▼	8.4	▼	9.5
25	% of Agency Staff		15%	15.8%	14.9%	▼	11.6%	▼	16.8%
26	Staff Turnover		10%	11%	7.3%	▼	3.9%	▼	11.2%

10.2

## Appendix 3

### Local Government Information Unit

#### Briefing: The Grenfell Inquiry

11 November, 2019

#### **Introduction**

The LGiU have previously published two briefings on Grenfell – both of which looked at the issues around fire safety, but we also examined the wider issues for local government, including the governance of the tower block, the confused accountabilities of the council, the ALMO and the Tenant Management Organisation, and the longer term impact of the fire on the community, the emergency services and on policy around social housing.

This briefing is about the inquiry and its recommendations. We will, however, return at some stage to these wider issues and will, of course, cover the publication of the second half of the inquiry whenever that is.

#### **The inquiry**

The public inquiry into the fire at Grenfell Tower on 14 June 2017, chaired by Sir Martin Moore-Bick, is divided into two phases. This briefing looks at the report on phase 1, which took place between May and December 2018, and was published last month.

Phase 1 mainly focused on the background to the fire in 2017 and events that took place on the night of the fire. The report makes 21 recommendations covering the information made available to the fire brigade, the availability of plans for high-rise buildings and the evacuation of the tower. These are referred to throughout this briefing and summarised towards the end.

The second phase of the inquiry, due to start early next year, will look at wider issues relating to the design and construction of Grenfell, including refurbishment of the building after 2005. However, some of the issues relating to building regulation also referred to in phase 1.

#### **A brief history of Grenfell Tower**

Built in 1974, Grenfell Tower is a residential tower block that forms part of the Lancaster West Estate in North Kensington, London. It is owned by Kensington and Chelsea, an inner London borough.



Prior to June 2017, most flats in Grenfell were let by the council as social housing. At the time of the fire, there were 14 leaseholders. Since 1996, the tower had been run by Kensington and Chelsea Tenant Management Organisation, a limited company that also managed other properties for the council across the borough.

The report refers to major works that were carried out by the TMO, mostly between 2005 and 2016. Between 2005 and 2006 both lifts were refurbished while, between 2011 and 2013, entrance doors were replaced. Between 2016 and 2017 a new gas supply was installed to serve the flats in the south-east corner of the tower.

### **Fire safety and the 'stay put' strategy**

High-rise residential buildings pose difficulties for firefighting because upper floors are beyond the normal means of external rescue. Buildings are designed so that occupants should, in theory, remain safe until a fire is extinguished or people can be evacuated. This includes providing a protected stairway, or another safe route, by which occupants can leave the building.

The principle of compartmentalisation, including self-contained living spaces, led to the 'stay put' strategy operated by London Fire Brigade. This means that, in the event of a fire in the building, occupants were advised to remain in their own flats unless directly affected by fire, heat or smoke.

According to the report: "This safety strategy reflects the assumption that where traditional construction methods are used, a fire in such a building will usually be contained within the flat of origin and that it is safer for the occupants of other flats to remain where they are rather than leave the building."

At the time Grenfell was built in the 1970s, the 'stay put' strategy was a building safety condition, but one that depended on proper installation and operation of active and passive fire protection measures. This included fire-resisting construction around front doors, lobbies and the protected stairway.

In July 2009, a major fire broke out at Lakanal House, a high-rise residential block in Camberwell, London. Six people died, including three were children. Nobody was prosecuted but a review was carried out by London Fire Brigade. This led to a continuation of the 'stay put' strategy.

Following the Lakanal fire, the Local Government Association published guidance for building owners entitled *Fire Safety in Purpose-Built Blocks of Flats*. Commissioned by the Department for Communities and Local Government following consultation with the Chief Fire Officers' Association, it said: "Compartmentation requires a higher standard of fire resistance than that normally considered necessary simply to protect the escape routes. This is to ensure that a fire should be contained within the flat of fire origin.

The guidance continued: "In the majority of fires in blocks of flats, residents of other flats never need to leave their flats."

An absence of a fire-detection and alarm system in high-rise blocks is generally acceptable because, added the guidance, it is “very rare for there to be an extensive failure of compartmentation.”

Guidance for fire and rescue services on fires in high-rise residential buildings was published by the DCLG and the Chief Fire and Rescue Adviser in 2014. This went further and considered the possibility that total or partial evacuation of a high-rise building might be necessary if compartmentation failed. Contingency plans should be formulated, and training provided, it said, so that fire and rescue services could take appropriate action should such an eventuality occur.

The phase 1 inquiry report calls into question the ‘stay put’ strategy in all instances and says fire and rescue services need policies for the partial or total evacuation of high-rise residential buildings in certain circumstances [see main recommendations].

### **Regulation of high-rise blocks**

When Grenfell Tower was built in the early 1970s, London had its own system of building legislation. By the time the main refurbishment of the tower was carried out between 2012 and 2016, the Building Act 1984 and building regulations of 2010 that were made under the act governed the construction of such buildings. These state that a building “shall be designed and constructed so that the unseen spread of fire and smoke within concealed spaces in its structure and fabric is inhibited.”

Practical guidance is contained in approved document B, which sets out methods that, if correctly followed, are expected to result in compliance with the regulations. This was last updated in 2013.

A person designing a building is not obliged to follow its recommendations and may choose to adopt other methods or materials, provided the building when completed complies with the requirements of the regulations.

While phase 1 of the inquiry was not intended to cover compliance with building regulations, the report says there was “compelling evidence that the external walls of the building failed to comply with requirement B4(1) of schedule 1 to the building regulations 2010”. This is because the walls did not “adequately resist the spread of fire having regard to the height, use and position of the building”. On the contrary, says the report, the walls “actively promoted it”. Phase 2 of the inquiry will examine “why those who were responsible for the design of the refurbishment considered that the tower would meet that essential requirement”.

The report also calls for owners and managers of high-rise residential buildings to provide local fire and rescue services with information about the design of external walls, including details of construction materials [see main recommendations].

### **Refurbishment of Grenfell Tower**

The main refurbishment of Grenfell, carried out between 2012 and 2016, affected both the outside and inside of the building. It incorporated the over-cladding of every storey of the existing building with a new insulation and rainscreen cladding system.

Rydon Maintenance as appointed design and building contractor, while the main architect was Studio E. Rydon's subcontractor for cladding was Harley Facades.

The work was paid for by Kensington and Chelsea Council, with its building control department acting as building control authority. This carried out inspection visits from 2014 onwards, before the building certificate for completion of the work was signed off by the council in July 2016. In addition to the over-cladding of the building, there was a full internal refurbishment of the lowest floors. This included the creation of nine new flats plus the relocation and refurbishment of the existing nursery and boxing club. A central part of the main refurbishment was the addition of a ventilated rainscreen insulation and cladding system. Effectively a new external wall was created. At floors 4 to 23 this comprised insulation materials, new windows, new window infill panels and outer aluminium composite material (ACM) rainscreen panels.

To accommodate the new flats, the hydraulic lift that had previously served the non-residential lower floors of the building was removed and new door openings into the two lift shafts serving the main building were created at floors 1 and 3.

In addition, the environmental and smoke ventilation system was overhauled and modified and made into a combined environmental and smoke control system.

The phase 1 inquiry report notes that no plans of the internal layout of the building were available to the LFB until the later stages of the fire. However, because each floor of the building above floor 3 was laid out in the same way, the brigade was not unduly hampered in fighting the fire and rescuing occupants. In another case, it says, the lack of floor plans might easily have far more serious consequences.

More seriously, firefighters at Grenfell Tower were unable to operate the mechanism that should have allowed them to take control of the lifts. It is not known why, but this meant they were unable use the lifts in firefighting or search and rescue operations. "It also meant that the occupants of the tower were able to make use of the lifts in trying to escape, in some cases with fatal consequences. The ability of fire and rescue services to take control of firefighting or fire lifts in a high-rise building is often key to successful operations," says the report.

The report calls for up-to-date floor plans, regular inspection of lifts, marking of floor levels in lobbies and staircase landings and inspection of fire doors and self-closing devices.

### **The role of London Fire Brigade**

The phase 1 inquiry report looks at the responsibilities, structure and organisation of London Fire Brigade. It sets out how the control room operated, along with the role of the incident commander at Grenfell. The provision of information to fire crews, and the equipment at their disposal is also covered.

The way in which firefighters were deployed indicated those in command exercised "insufficient control over their actions to ensure that resources were used efficiently",

says the report. “Too often firefighters or junior officers acted on their own initiative, resulting in confusion and duplication of effort.” In addition, despite LFB policies, there was a lack of regular communication between the control room and the incident commander at Grenfell, as well as between the incident commander and the bridgehead

The report makes a series of recommendations over communication between LFB’s control room and the incident commander, its handling of emergency calls, sharing of information by crews returning from deployments and communication equipment used by crews deployed in firefighting and rescue operations in high-rise buildings [see below].

### **Main Recommendations**

The main recommendations from the phase 1 inquiry are as follows:

#### **Materials used in high-rise buildings**

- Owners and managers of high-rise residential buildings be required by law to provide local fire and rescue services with information about the design of external walls and details of construction materials
- Fire and rescue services to ensure personnel understand the risk of fire taking hold in the external walls of high-rise buildings and recognise when it occurs

#### **Plans**

- Owners and managers of high-rise residential building be required by law to provide local fire and rescue services with up-to-date plans (in paper and electronic form) of every floor, identifying key fire safety systems
- Buildings to contain a premises information box, with a copy of up-to-date floor plans and information about the nature of any lift intended for use by fire and rescue services

#### **Lifts**

- Owners and managers of high-rise residential building be required by law to carry out regular inspections of lifts designed for use by firefighters in an emergency and report results to local fire and rescue services each month
- Regular tests be carried out on the mechanism that allows firefighters to take control of the lifts

#### **Communication between control room and incident commander**

- London Fire Brigade to review policies on communications between its control room and incident commander, plus better training.

### **Emergency calls**

- LFB policies to draw a clearer distinction between callers seeking advice and those who believe they are trapped and need rescuing
- Policies be developed for managing transition from 'stay put' to 'get out'

### **Command and control**

- LFB policies and training to ensure better information is obtained from crews returning from deployments and recorded so it is available immediately to the incident commander

### **Equipment**

- LFB to urgently obtain equipment that enables firefighters wearing helmets and breathing apparatus to communicate effectively with the bridgehead when operating in high-rise buildings

### **Evacuation**

- Government to develop national guidelines for partial or total evacuations of high-rise residential buildings, protection of fire exit routes plus procedures for evacuating people who are unable to use stairs or require assistance
- Fire and rescue services develop policies for partial and total evacuation of high-rise residential buildings and training to support the policies
- Owners and managers of high-rise residential building be required by law to draw up and regularly review evacuation plans, copies to be provided to local fire and rescue services and placed in information box on the premises
- All high-rise residential buildings be equipped with facilities enabling fire and rescue services to send an evacuation signal to the whole or a selected part of the building
- Owners and managers of high-rise residential building be required by law to prepare personal emergency evacuation plans for residents whose ability to self-evacuate may be affected by reduced mobility or cognition
- Fire and rescue services be equipped with smoke hoods for evacuation of occupants through smoke-filled exit routes

### **Sprinkler systems**

- Phase 1 of the inquiry did not hear any evidence about the use of sprinklers, their effectiveness under different conditions, or the cost of installing them in existing buildings. The report therefore makes no recommendation about sprinkler systems, though they are likely to be considered in phase 2.

### Internal signage

- All floor numbers in high-rise buildings to be clearly marked on each landing within the stairways and in a prominent place in all lobbies so they are visible in normal conditions, and in low lighting or smoky conditions

### Fire doors

- Owners and managers of residential building containing separate dwellings (not just high-rise buildings) carry out an urgent inspection of all fire doors to ensure they comply with applicable legislative standards, with checks at least every three months to ensure that fire doors fitted with self-closing devices are in working order.

### Co-operation between emergency services

- The report criticises emergency services in London for declaring a major incident at Grenfell without immediately informing the others. In future, it says, each emergency service should communicate the declaration of a major incident to all other 'category 1 responders' as soon as possible.

### Comment

The Grenfell survivors and families largely welcomed the recommendations of the inquiry. They also stressed the role of rank and file firefighters, who 'rather than being scapegoated in the report, were let down by their training, procedures, equipment and leadership'. They, however, did call for the resignation of the Head of London Fire Brigade Dany Cotton to resign.

The FBU said the inquiry should be "a turning point for fire safety in the UK. Warning after warning from previous fires were ignored; central government must now take responsibility for ensuring that recommendations are applied nationwide, not just in London; this has never simply been a matter for the London Fire Brigade". They were critical, though, of the conclusions about the stay put policy: "Concerns about stay put policy were raised with central government years before Grenfell. There was no other evacuation policy available to firefighters on the night, the report rightly recognises this. Those on the ground believed that a whole-scale evacuation would have been unsafe, potentially causing further fatalities. "We strongly refute the report's assertion that it would have been possible or safe to evacuate more than 150 people via a narrow smoke-logged stairwell with just 30 firefighters. There is no evidence to suggest that this was possible".

The report ends with looking ahead at phase 2:


"The principal focus of Phase 2 will be on the decisions which led to the installation of a highly combustible cladding system on a high-rise residential building and the wider background against which they were taken. However, a number of other

matters have emerged from the evidence gathered in Phase 1 which, although not yet fully explored”.

These issues are mainly still about the specific causes of the fire and the response to it. There is, however, recognition of wider issues:

“From the outset members of the local community have said that they warned the TMO on many occasions about fire hazards, both those arising from the refurbishment and more generally. There is a strong feeling among them that their voices were ignored and that if attention had been paid to them the disaster could have been avoided. There is also a strong view in many quarters that in their response to the disaster the authorities failed the community by not providing adequate support in the days immediately following the fire. These are both important matters for further investigation in Phase 2, not least because they reflect what is said to be a general lack of concern on the part of the authorities for the residents of the tower and the wider community”.

It will be crucial that the inquiry does indeed examine these issues, given their importance to the families, survivors and the Grenfell community, and to local government.

<p><b>Board of Directors</b></p> <p>10<sup>th</sup> December 2019</p>	
<p><b>Report authorised by:</b> Paul Davey – Director of Business Transformation</p> <p><b>Report Author:</b> Adam Evans – Delivery Manager LBTH David Mynors – Digital Strategy Consultant THH</p>	<p><b>Report type:</b> For information</p>
<p><b>Title:</b> Social Housing Broadband</p>	

**1. Introduction**

The UK Government has set a target that all UK homes should have a fast, full fibre connection by 2025. In order to achieve this target, the UK Government has encouraged broadband operators, to accelerate their network build programmes. New obligations have been levied on landowners to grant access for fibre installation to their properties.

LBTH and Tower Hamlets Homes (THH) have taken the opportunity to benefit from this government initiative and intend to upgrade its properties with the potential of full fibre connectivity, leveraging as much social value as is reasonable from interested operators.

**2. Project Definition**

The Social Housing Broadband programme will deliver fast connections to the Council’s stock, managed by THH. The rollout will use multiple broadband providers who will be adhering to a standard Wayleave Agreement with the Council. A Wayleave agreement is the contract that determines the right for a broadband provider to install, place or run their equipment over the landlord’s property for the purpose of providing internet access.

Once the fibre is in place, the providers will offer competitively priced internet connectivity to residents, see table below. In addition, operators will work with the programme to develop a discounted ‘social tenant tariff’ which will be made available to the neediest of council residents. The expectation is that residents will receive increased broadband speeds for a similar or lower price than offered by current providers.



Table 1 – Example Pricing (HyperOptic)

Speed	50Mbps	150Mbps	400Mbps	1Gbs
Monthly Fee (Inc. VAT)	£20	£25	£35	£50

**Notes:** A social tenant tariff under discussion will be offered at £10 / month for 50Mbps  
No installation or activation fees are charged for 12 month contracts

### 3. Objectives

THH and the Council have taken a proactive approach to satisfy our new obligations as a landlord whilst delivering benefits. THH will ensure a coordinated & managed approach to the rollout of Broadband to residents.

Digital wellbeing initiatives include:

1. Easy access to job and apprenticeship opportunities advertised within the borough
2. Provision of a low cost 'social tenant' tariff to 10%, as described above
3. Provision of complimentary fibre connections to Tower Hamlets / THH non-residential buildings where viable, such as community centres, family centres and estate offices
4. Provision of digital skills support in the borough

### 4. Progress

The preliminary activities had been focused on drafting the standardised wayleave agreements that determine how operators will deliver their services to the THH housing stock. Fibre operators that have shown an interest in deploying around Tower Hamlets are:

- Community Fibre
- HyperOptic and
- Virgin Media

A standard Wayleave agreement has been issued to all three operators for signing. One operator, Community Fibre, has completed the signing.

In preparation for the full rollout all three operators were required to undertake a pilot launch site survey and submit their installation proposals for ratification by THH. The survey sites agreed were:

- Community Fibre – Leadenham Court, Lincoln Estate
- HyperOptic – Locksley 1a
- Virgin Media - Bewley House, Solander Gardens East

All surveys have now been undertaken, installation proposals have been received and Community Fibre has undertaken a kick-off session at the City Reach offices where THH staff, managers and the executive management team were invited to attend.

## 5. Next Steps

By the end of the 2019 calendar year:

- Wayleave agreements signed for all operators
- All installation proposals for pilot sites ratified by THH
- Permit to Work granted by THH Health and Safety
- Community Fibre rollout commenced for their allotted pilot sites

Consideration has been given to the appropriate governance structure required to oversee the programme through 2020 and 2021, during which time, the programme will work with the operators to provide fast broadband capability to the majority of THH properties, although it is understood that there may be some circumstances where connectivity cannot be supplied such as listed status, blocks highlighted for redevelopment, operator commercial constraints etc. Currently, this project is overseen by the Council's Digital Connectivity Board, on which THH are represented, and the makeup of this body will be reviewed to ensure key stakeholders are included.

In 2020, the operators will work with THH to plan a survey schedule of works and submit installation proposals in order to ramp up the delivery of fibre across the housing stock. The rollout is expected to last between 18 and 24 months dependent on factors such as survey rate, installation proposal acceptance and consideration of the Better Neighbourhoods Programme to ensure no conflicts arise.

