

GROWTH PROPOSAL

Proposal Title:	Housing Portfolio Investment for Building Safety Resources (Risk Team)		
Reference:	GRO / HRA 001 / 24-25	Growth Type:	Mayoral Priority
Directorate:	Housing and Regeneration Housing Revenue Account (HRA)	Growth Service Area:	Housing Revenue Account
Directorate Service:	Housing Asset Management	Strategic Priority:	2. Providing homes for the future
Lead Officer and Post:	Michael Killeen, Director of Asset Management Darren Cruice, Head of Asset Management and Compliance	Lead Member and Portfolio:	Cllr Kabir Ahmed, Cabinet Member for Regeneration, Inclusive Development and Housebuilding

Financial Impact:	Current Budget 2023-24	Growth 2024-25	Growth 2025-26	Growth 2026-27	Total Growth
Budget (£000)	0	363	(181)	(88)	94

Staffing Impact (if applicable):	Current 2023-24	FTE Increase 2024-25	FTE Increase 2025-26	FTE Increase 2026-27	Total FTE Increase
Employees (FTE) or state N/A	17	5	-	-	5

Proposal Summary:
<p>The Council proposes to set aside 2.4M in a ringfenced reserve to provide additional funding to support the work of the existing “Risk Team”, apportioned pro-rata across three years.</p> <p>The team provides the professional lead working with other teams for building risks including fire safety, asbestos, gas, electrics, water hygiene and lifts. It surveys and maintains our asset data which sits at the centre of our work on damp & mould, develops our capital programme, compliance with decent homes and statutory risks. It also leads on the data supporting economic assessment of our housing stock.</p> <p>It ensures that we comply with statutory requirements and meet expectations of both the Housing Regulator and Building Safety Regulator</p> <p>In addition to the above, the team continues to lead on the preparations for the implementation of the Building Safety Act following the Grenfell Tower tragedy. This includes the preparation and maintenance of ‘building safety cases’ which is an extremely complex workstream. Like many Landlords we continue to improve our understanding of requirements and improve our approach in what is a very challenging and fast-moving environment.</p> <p>This bid covers several elements:</p> <ul style="list-style-type: none"> • A programme of specialist structural and fire surveys to our 77 buildings over 18m which will ensure we understand and identify all the relevant risks to our residents. This will build on the work we have done in the last 18 months and will take a further 3 years to complete. These surveys provide the evidence trail for the preparation of our safety cases. • Specialist mechanical & electrical surveys in regards to our communal heating systems and the electrical infrastructure across our 930 blocks of flats. This will compliment our existing stock condition data and allow us to improve our investment planning as well as our approach to net zero carbon. • Laser scanning of our buildings to facilitate floor plan preparation and help develop the ‘golden thread’ for Building Safety • Compliance with new regulations requiring us to inspect annually all front entrance doors across 330 blocks of flats. • 5 new FTEs including: <ul style="list-style-type: none"> ○ Fire risk surveyor (trainee) to work on fire risk actions and improve inspection of all buildings (not just high rise) ○ Two additional building safety officer posts to work within the existing team and extend our programme of door inspections from buildings over 18m to all those over 11m. This is a statutory requirement. ○ A Fire Risk Coordinator who will manage the annual programme of 12,000 door inspections and repairs, manage our compliance across the Council with LOLER lift regulations (a statutory requirement). The post also manages the LFB portal and tracks repairs to essential firefighting equipment. This work is currently done by an agency temp.

- A Building Safety Coordinator to develop and maintain building safety cases (statutory obligation). This work is currently done by a consultant and the recruitment of a full-time employee will provide a small saving.
- Minor changes to the supervision of the building safety team to incorporate the increased numbers.
- There is an ongoing requirement to fund 6x software licences for the ASCE Building Safety Case application which we use to prepare building safety cases. In addition, we need to pay for licenses for the Savills SHAPE data system which supports the longer term economic strategic assessment of our housing stock
- A small sum to support consultation and engagement with residents in high rise buildings – hiring halls etc
- A dedicated team to support the work of the Building Safety Officers in Risk Team (buildings over 18m) and the Fire Safety Team (all other buildings below 18m). This will allow us to respond quickly to hazards in buildings that provide a risk to life and limb including removal of rubbish, and combustible items from fire escapes, removal of gates and grills and e bikes. Plus, minor repairs to doors, compartmentation We currently spend a considerable sum with external contractors to do this work.

The growth figures contained above are net of the £2.4m funding resulting from the change in accounting treatment for MRP. From 2027-28 there will be an ongoing requirement of £424K per year to support the programme.

Description	Asset Management and Compliance (10804)					
	Spend 2024-25	Spend 2025-26	Spend 2026-27	Total	Growth 2027-28 onwards	Comment
57 x Block Structural surveys >18m (building safety cases) @£10,500 each	294,000	304,500	0	598,500	0	One off growth for 2 years
30 x Block Means of Escape reports >18m (building safety cases) @£4,000 each	120,000	0	0	120,000	0	One off growth
30 x Block Type 4 Fire Risk Assessments >18m slippage from 2023/24 (building safety cases) @£3,900 each	117,000	0	0	117,000	0	One off growth
37 x Block Laser Scans floor plans >18m slippage from 2023/24 (building safety cases) @£5,100 each	188,700	0	0	188,700	0	One off growth
35 x Block External Wall System surveys for <18m (enhanced scrutiny of landlords by the Housing regulator) @£15,200 each	497,000	0	0	497,000	0	One off growth
Detailed review/investigations of all communal heating systems to facilitate future works (decarbonisation)	40,000	40,000	0	80,000	0	One off growth
Specialist condition surveys to Landlords electrical supply	40,000	40,000	0	80,000	0	One off growth

171 (homes) x Structural survey remediation/redecorations to 3 homes per block @£500 per home. Directly related to 57 x block structural surveys	42000	43,500	0	85,500	0	One off growth
79 x Block Building Safety costs in relation to management of tenant and leasehold homes (such as removal of gates/grilles, combustibles)	100,000	100,000	100,000	300,000	100,000	Ongoing base budget
Meeting Expenses (hire of halls/rooms to meet residents living in 18m+ blocks)	7800	7800	7800	23,400	7,800	Base budget to be increased by this amount from 2024/25
Computing - Licences - Software (ASCE -Building Safety Case application and SHAPE - viability model application	15,980	15,980	15,980	47,940	15,980	Base budget to be increased by this amount from 2024/25
M&A Salaries - Pay & Oncost	300,763	300,763	300,763	902,289	300,763	1 x Fire Risk Co-Ordinator (P04) @£60,667.25 AND 1 x Fire Risk Surveyor (P02-P04) @£60,667 AND 2 x Building Safety Officers (door inspections 11m to 18m blocks) (P01) @£100,389.88 AND 1 x Building Safety Case Co-Ordinator (P04) @£60.667 AND 1x Building Safety Officer Team Leader (P04) @£60,667.25 AND 1x Building Safety Officer DELETION (P01) @£-50,194.94
Total Spend	1,763,243	852,543	424,543	3,040,329	424,543	
Funding Identified	(1,400,000)	(670,000)	(330,000)	(2,400,000)	0	
Net Spend	363,423	182,543	94,543	640,329	424,543	
Net Growth	363,243	(180,700)	(88,000)	94,543		

Budgeted Outcomes / Accountability (focus on improved performance):

The proposals in this growth bid will enable the Council to meet its obligations under the Building Safety and Fire Safety Acts and associated Regulations.

Risks and Implications:

The proposals in this growth bid and "Risk Team" will enable the Council to meet its obligations under the Building Safety and Fire Safety Acts and associated Regulations. Any failure to comply with the Act would represent a significant reputational risk and indeed even the risk of criminal prosecution. This risk would be exacerbated in the event of an incident occurring. The risk to "life or limb" to persons is a potential outcome of not providing adequate resources for programme of building safety work within our housing stock. The reputation of LBTH and the risk of legal action is critical, however the safety of our homes and our management of the risk is paramount.

Value for Money and Efficiency:

The proposals in this growth bid are based on emerging best practice to meet the new statutory requirements in this area. The resources will establish information on held assets, there is a long term value by way of building a comprehensive safety information pack for buildings and asset register and evidencing our cyclical inspection obligations.

GROWTH PROPOSAL – BUDGET EQUALITY ANALYSIS SCREENING TOOL

Trigger Questions	Yes / No	If Yes – please provide a brief summary of how this impacts on each protected characteristic as identified in the Equalities Act 2010. This will need to be expanded in a full Equality Analysis at full Business Case stage.
Does the change reduce resources available to address inequality?	No	
Does the change reduce resources available to support vulnerable residents?	No	
Does the change involve direct impact on front line services?	No	
Changes to a Service		
Does the change alter who is eligible for the service?	No	
Does the change alter access to the service?	No	
Changes to Staffing		
Does the change involve a reduction in staff?	No	
Does the change involve a redesign of the roles of staff?	No	
Summary:		
To be completed at the end of completing the Screening Tool.		
Based on the Screening Tool, will a full EA be required?	No	
Additional Information and Comments:		

GROWTH PROPOSAL

Proposal Title:	Resourcing Complaints Handling – Landlord Services		
Reference:	GRO / HRA 002 / 24-25	Growth Type:	Unavoidable Growth
Directorate:	Housing and Regeneration Housing Revenue Account (HRA)	Growth Service Area:	Housing Revenue Account
Directorate Service:	Neighbourhood Services	Strategic Priority:	2. Providing homes for the future 8. A council that listens and works for everyone
Lead Officer and Post:	Gulam Hussain, Head of Regulatory Assurance	Lead Member and Portfolio:	Cllr Kabir Ahmed, Cabinet Member for Regeneration, Inclusive Development and Housebuilding

Financial Impact:	Current Budget 2023-24	Growth 2024-25	Growth 2025-26	Growth 2026-27	Total Growth
Budget (£000)	60	98	-	-	98

Staffing Impact (if applicable):	Current 2023-24	FTE Increase 2024-25	FTE Increase 2025-26	FTE Increase 2026-27	Total FTE Increase
Employees (FTE) or state N/A	0	3	-	-	3

Proposal Summary:

This proposal is seeking ongoing base budget growth of £98,232 to recruit three officers at Grade I to respond to social housing complaints at Stage 2. Funding for this has been identified by repositioning “professional fees” budgets that were contained within the previous THH CEO and Director of Finance cost centres.

Complaints handling within THH (now part of the Housing & Regeneration Directorate) has been managed on the principle that the landlord services respond to complaints at Stage 1 of the process and the review at Stage 2 is carried out by the Council’s Corporate Complaints Team via an SLA that costs £60,000 per annum (approx. 1 FTE). Due to the current staffing levels, volumes of complaints and the complexity, performance is low, just 20% of stage 2 complaints were responded to within 20 working days target (end Q2 2023/24), compared 90% of complaints being responded within 10 days at Stage 1. While this is in part due to the Corporate Complaints team having a recruitment gap for a senior complaints officer for approx. 9 months, it is clear even a fully staffed service of 3 FTE to have to cover all Stage 2 casework council wide as well as THH was insufficient and provides insufficient resilience for a service to come under the remit of two separate Ombudsman (Local Government and Social Care Ombudsman and Housing Ombudsman) with different criteria. Having all Stage 2 and two Ombudsman casework split across a single service of 3 FTE at max capacity has shown to be an unsustainable model.

The Housing Ombudsman serves as the governing body for complaints handling across the social housing sector. In recent years, the Ombudsman has grown significantly in size and influence in line with the changes to Social Housing Regulations driven by the tragic events at Grenfell Tower. In 2020 the Ombudsman published a revised Complaints Handling Code which imposes new standards for complaints handling across the sector. This introduces new sanctions for landlords who fail to comply and widens the remit of the Ombudsman to direct compliance through spotlight reports setting out best practice and direct intervention, as seen in the case of a number of London local authorities. The activities and findings of the Ombudsman service have also drawn the attention of the Secretary of State who has taken the step of writing to local authority Chief Executives. With the advent of the Social Housing (Regulation) Act 2023, compliance with the code is now a statutory requirement. The Ombudsman also has agreements in place with the Regulatory for Social Housing and the Building Safety Regulatory. This allows it to make referrals to the respective bodies for further regulatory intervention where there is concern around compliance with the Consumer Standards.

The Housing Ombudsman’s Code specifically requires landlords to ensure complaint handlers have the appropriate skills and have a person or team to take responsibility for complaint handling to ensure complaints receive the necessary attention. In the current operating context, it is increasingly imperative for complaint handlers who are responsible for dealing with housing related complaints to be operationally embedded, have access to relevant systems, an understanding of relevant policies and procedures, and an awareness of trends and issues specific to social housing to ensure they are able to provide effective resolutions for customers and also safeguard the reputation of the landlord.

As part of this growth and the immediate regulatory risks posed to the Council by failing to demonstrate compliance with social housing regulations, it is proposed that the responsibility for responding to Stage 2 complaints is transferred to housing management services – specifically within the Regulatory Assurance Team in Neighbourhood Services. This approach is increasingly being adopted by other local authorities who have recognised the need for specialisation around social housing and will ensure we have a consistent approach to responding to housing complaints and all stages.

This will significantly improve the response rate of Stage 2 complaints responded to in 20 working days. It will also decrease the risk of maladministration and complaint handling failure orders issued by the Housing Ombudsman, which comes with significant reputational risk (councils are being “named and shamed”) and increased scrutiny by Secretary of State and Regulator of Social Housing. The resource will also be responsible for supporting between 70-80 cases per year that would escalate to the Housing Ombudsman service. This would require collation of all relevant case history which is often a complex and time-consuming task.

Based on current volumes 3 FTE is needed. It is estimated that the posts would be graded at PO2 (Grade I) – circa £52,744 including on cost per post. In addition to independently reviewing S2 requests, the complaint handlers will be responsible for tracking the delivery of remedial actions agreed as part of the complaint’s resolution process. In addition to managing a caseload of Stage 2 escalations, post holders will be expected to work closely with services to provide advice on resolution and application of the Housing Ombudsman’s dispute resolution principles/remedy guidance, identifying trends and themes and identify best practice.

1 of the 3 proposed posts can be funded by redirecting the SLA that is currently paid to the Corporate Complaints Team for providing the Stage 2 review function. This is valued at £60k per annum. This would leave a shortfall of £98,232 which needs to be funded through growth. There is no scope to transfer resources from the Corporate Complaints Service as that would create a shortfall in an area that is already not adequately resourced. The redirection of the SLA would also create a resourcing gap within the Corporate Complaints Service which would need to be met through the General Fund. The Corporate Complaints Service agrees with the content of this Growth Bid proposal as it would allow their current Stage 2 demand (outside of housing management casework) to be more appropriately in line with their current structure and resource as has been demonstrated above.

Budgeted Outcomes / Accountability (focus on improved performance):

The housing management services currently deal with approximately 2000 complaints a year at Stage 1. Despite the volumes we ensure approximately 90% of all complaints are responded to within 10 working days in line with the Housing Ombudsman’s code, and 73% of all complaints receive a call to discuss the complaint within 2 working days of the complaint being logged.

With the additional resources sought through the growth bid, we would aim to respond to all stage 2 complaints within 20 working days and that 100% of all stage 2 complaints receive a call to discuss the complaint within 2 working days of the escalation. The resources would also be used to manage inbound communication and information requests from the Ombudsman who currently makes between 60-70 requests per year for detailed information bundles including full case histories, system information on actions taken and relevant policies and procedures.

We would also expect to see reductions in the volumes of cases escalating to the Housing Ombudsman and in doing so a reduction in any compensation awards that are paid to residents for failures within the complaints handling process.

Risks and Implications:

A failure to adequately resource this function is likely to result in an increase in maladministration findings and complaint handling failure orders issued by the Housing Ombudsman. With each maladministration finding from the Housing Ombudsman, also comes financial penalties which often average in thousands of pounds per individual case investigation. This means the financial cost of having inadequate and dedicated resource would likely accumulate rapidly. This in turn is also expected to invite further scrutiny of landlord services from the Secretary of State and the Regulator for Social Housing and encourage early intervention from the Regulator. There is significant risk to reputation.

Value for Money and Efficiency:

This is a necessary growth that is required to demonstrate compliance with regulations in the social housing sector.

GROWTH PROPOSAL – BUDGET EQUALITY ANALYSIS SCREENING TOOL

Trigger Questions	Yes / No	If Yes – please provide a brief summary of how this impacts on each protected characteristic as identified in the Equalities Act 2010. This will need to be expanded in a full Equality Analysis at full Business Case stage.
Does the change reduce resources available to address inequality?	No	
Does the change reduce resources available to support vulnerable residents?	No	
Does the change involve direct impact on front line services?	Yes	The proposed change improves access for residents who may need to utilise the complaints process. The change makes provision for complaints to be dealt with in line with statutory and regulatory guidelines and ensure residents receive a fair and equitable service.
Changes to a Service		
Does the change alter who is eligible for the service?	No	
Does the change alter access to the service?	No	
Changes to Staffing		
Does the change involve a reduction in staff?	No	
Does the change involve a redesign of the roles of staff?	No	
Summary:		
To be completed at the end of completing the Screening Tool.		
Based on the Screening Tool, will a full EA be required?	No	
Additional Information and Comments:		

GROWTH PROPOSAL

Proposal Title:	Temporary Accommodation Budget		
Reference:	GRO / HRA 003 / 24-25	Growth Type:	Unavoidable Growth
Directorate:	Housing and Regeneration Housing Revenue Account (HRA)	Growth Service Area:	Housing Revenue Account
Directorate Service:	Neighbourhoods	Strategic Priority:	2. Providing homes for the future
Lead Officer and Post:	Gulam Hussain, Head of Neighbourhoods	Lead Member and Portfolio:	Cllr Kabir Ahmed, Cabinet Member for Regeneration, Inclusive Development and Housebuilding

Financial Impact:	Current Budget 2023-24	Growth 2024-25	Growth 2025-26	Growth 2026-27	Total Growth
Budget (£000)	22	280	-	-	280

Staffing Impact (if applicable):	Current 2023-24	FTE Increase 2024-25	FTE Increase 2025-26	FTE Increase 2026-27	Total FTE Increase
Employees (FTE) or state N/A	N/A	N/A	N/A	N/A	N/A

Proposal Summary:

This is an essential growth bid. Neighbourhoods is increasingly required to temporarily decant residents in response to an increase in the number of disrepair, complex repair and damp and mould cases which cannot be completed with residents in situ. The problem is exacerbated by the levels of overcrowding in the borough. The spend incurred to date reflects our response to new regulatory expectations that have been set by the Housing Ombudsman as well as a political expectation as to how LBTH responds to requests for emergency rehousing. The increase in costs also reflects the impact of inflationary pressures which have significantly driven up costs of accommodation.

The outturn for 22/23 was £187,922 against a budget allocation of £21,974. For 23/24, we have already spent circa £317,000 and expect additional spend before the end of the financial year.

Budgeted Outcomes / Accountability (focus on improved performance):

Neighbourhoods will be closely monitoring how we fulfil our repairs obligations and ensure these are completed as quickly as possible to minimise the period for which a resident must be decanted to temporary accommodation. We have mechanisms in place to do this and will continue to ensure this area is being monitored.

Risks and Implications:

Neighbourhoods will continue to need funding to fulfil its obligations to temporarily rehouse tenants. As evidenced by the spend incurred to date, these costs will need to be found and there is no clear mitigation for the issue. Alternative options would be to retain a large portfolio of furnished voids for use as respite units, but this will have an impact on the HRA and rent loss and also reduce the supply of available homes to be relet to families on the social housing register.

Value for Money and Efficiency:

Decisions on rehousing are always made where this is deemed necessary. Neighbourhoods always explores options for alternative accommodation arrangements, including encouraging residents to stay with friends and family where this is an option or completing works with residents in situ before considering a temporary decant.

GROWTH PROPOSAL – BUDGET EQUALITY ANALYSIS SCREENING TOOL

Trigger Questions	Yes / No	If Yes – please provide a brief summary of how this impacts on each protected characteristic as identified in the Equalities Act 2010. This will need to be expanded in a full Equality Analysis at full Business Case stage.
Does the change reduce resources available to address inequality?	No	
Does the change reduce resources available to support vulnerable residents?	No	
Does the change involve direct impact on front line services?	No	
Changes to a Service		
Does the change alter who is eligible for the service?	No	
Does the change alter access to the service?	No	
Changes to Staffing		
Does the change involve a reduction in staff?	No	
Does the change involve a redesign of the roles of staff?	No	
Summary:		
To be completed at the end of completing the Screening Tool.		
Based on the Screening Tool, will a full EA be required?	No	
Additional Information and Comments:		

GROWTH PROPOSAL

Proposal Title:	Housing Efficiencies & Improvement Project IT and Systems		
Reference:	GRO / HRA 004 / 24-25	Growth Type:	Budget Pressure
Directorate:	Housing and Regeneration Housing Revenue Account (HRA)	Growth Service Area:	Housing Revenue Account
Directorate Service:	Neighbourhoods (Business Transformation)	Strategic Priority:	2. Providing homes for the future
Lead Officer and Post:	Chris Smith, Head of Resources	Lead Member and Portfolio:	Cllr Kabir Ahmed, Cabinet Member for Regeneration, Inclusive Development and Housebuilding

Financial Impact:	Current Budget 2023-24	Growth 2024-25	Growth 2025-26	Growth 2026-27	Total Growth
Budget (£000)	230	90	(90)	-	0

Staffing Impact (if applicable):	Current 2023-24	FTE Increase 2024-25	FTE Increase 2025-26	FTE Increase 2026-27	Total FTE Increase
Employees (FTE) or state N/A	N/A	N/A	N/A	N/A	N/A

Proposal Summary:

This growth bid is a "Invest to Save" proposal to continue funding of a key housing management project which aims to make statutory housing management services more efficient and offer customer service improvements to residents.

The anticipated net savings are estimated £22k per year, effectively a payback period of four years.

The project is a one-off growth bid to deliver / implement improvements to the ongoing provision of IT system for revenue and capital payments for leaseholders.

This project commenced within THH and the growth bid is to resource the continued work at a delivery stage.

Funding of a one-off £90k in 2024-25 covers the technical and project management resources deployed for the remainder of the Smarter Services for Leaseholders Programme.

Smarter Services for Leaseholders Programme
This is a multi-year programme to improve the customer and staff experience via the improved use of NEC Housing systems functionality to support efficient business processes.

The 2024-25 key deliverable will be the migration of Direct Debits from the stand-alone and expensive AllPay solution to the native NEC Housing solution which is already used by Rents and is much more cost effective.

NEC Housing transaction costs for a Direct Debit are around a third of the AllPay transaction processing costs and would see a saving of £32,000 per year from termination of the AllPay contract with the NEC replacement costing £10,000 per year.

Managing Direct Debits on NEC Housing will also allow us to enable the creation of Direct Debits through our online customer portal, MyHome (formerly MyTHH), which would offer customers more control over managing their payments and could unlock future efficiencies in service delivery. Additionally, there will be resource efficiencies, with the proven NEC process being easier to administer.

This programme was put together to address the recommendations of the HQN (Housing Quality Network) Leasehold Service Review conducted in 2019.

Budgeted Outcomes / Accountability (focus on improved performance):

Smarter Services for Leaseholders Programme

Great Services

- Improving the range of online services available to leaseholders;
- Streamline income collection for leaseholders and make it easier for them to manage their service charges and major works invoices;
- Improved data quality to enhance management of commercial landlords, improve the provision of accurate and detailed information to leaseholders, manage garage accounts.

Risks and Implications:

These projects address the following risks on the Housing Management Corporate Risk Register:

- CORP0002 – Core IT Systems unable to meet requirements
- CORP0010 – Insufficient capacity to deliver transformational objectives


Value for Money and Efficiency:

Smarter Services for Leaseholders Programme

Implementation of Direct Debits on NEC Housing would enable Leasehold Services to terminate their arrangement with AllPay for the collection of Direct Debit payments from leaseholders, realising an annual saving of circa £22k, with direct benefits for leaseholders in their service charges.

AllPay transactions charges for DD are more than three times the cost of those raised via NEC Housing.

GROWTH PROPOSAL – BUDGET EQUALITY ANALYSIS SCREENING TOOL

Trigger Questions	Yes / No	If Yes – please provide a brief summary of how this impacts on each protected characteristic as identified in the Equalities Act 2010. This will need to be expanded in a full Equality Analysis at full Business Case stage.
Does the change reduce resources available to address inequality?	No	
Does the change reduce resources available to support vulnerable residents?	No	
Does the change involve direct impact on front line services?	Yes	<p>Smarter Services for Leaseholders programme is delivering a range of improvements to processes and services. The programme has already delivered a downloadable online service charges statement via the MyHome Housing Online platform, and a range of e-forms for leaseholders, and their solicitors, to assist with applications for alterations and other permissions and with reselling a property. Future deliverables will improve the accessibility of service charge and major works date, introduce process efficiencies and enable the use of a more cost-effective direct debits solution.</p> <p>The profile of council tenants and leaseholders is embedded below:</p> <div style="text-align: center;">  <small>THH%20Tenants%20and%20Leaseholders'</small> </div>

Changes to a Service

Does the change alter who is eligible for the service?	No	
Does the change alter access to the service?	Yes	There would be no direct impact upon any of the protected characteristics although for those customer for whom English is not their main language they may find the use of online channels, where translation tools or family members can assist, to be more a better access route to our services.

Changes to Staffing

Does the change involve a reduction in staff?	No	
Does the change involve a redesign of the roles of staff?	No	

Summary:

To be completed at the end of completing the Screening Tool.	
Based on the Screening Tool, will a full EA be required?	No

Additional Information and Comments:

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