

Crawley Borough Council

Overview and Scrutiny Commission

Agenda for the **Overview and Scrutiny Commission** which will be held in **Committee Rooms A and B - Town Hall**, on **Monday, 13 January 2025** at **7.00 pm**

Nightline Telephone No. 07881 500 227



Chief Executive

Membership: Councillors M L Ayling (Chair), H Hellier (Vice-Chair), O Adeniyi, I Ashraf, E Barrott, N Hilton, G S Jhans, I Khan, K Khan, R A Lanzer, D Ramsay and J Russell

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Please note that the comment function will be unavailable.

The order of business may change at the Chair's discretion

Part A Business (Open to the Public)

	Pages
1. Apologies for Absence	
2. Disclosures of Interest and Whipping Declarations	
In accordance with the Council's Code of Conduct, councillors are reminded that it is a requirement to declare interests where appropriate.	
Councillors must also declare if they are subject to their party group whip in relation to any items under consideration.	
3. Minutes	5 - 12
To approve as a correct record the minutes of the Overview and Scrutiny Commission held on 25 November 2024.	
4. Public Question Time	
To answer any questions or hear brief statements from the public which are relevant to the items on this agenda. The period will end after 15 minutes or later at the Chair's discretion.	
5. Safer Crawley Partnership Annual Review and Forthcoming Priorities	
To receive the annual performance update on the Safer Crawley Partnership along with the future priorities	
6. Cabinet Member Discussion with the Cabinet Member for Public Protection	13 - 14
Councillor Yasmin Khan has been invited to attend the Commission for a general discussion on the Public Protection Portfolio and their duties. A copy of the Cabinet Member's responsibilities, as set out in the Council's Constitution is attached.	

7. Housing Policies: (Compensation, Short-term Alternative Accommodation, Stock Condition, CCTV)

Pages

15 - 102

To consider report CH/211 of the Head of Crawley Homes.

8. Crawley Town Centre Update

103 - 114

To consider report PES/476 of the Head of Economy and Planning.

9. Health and Adult Social Care Scrutiny Committee (HASC)

To receive a brief update on the [Health and Adult Social Care Scrutiny Committee](#) (HASC).

10. Forthcoming Decision List - and Provisional List of Reports for the Commission's following Meetings

To consider any requests for [future items](#). Those highlighted items have been referred to the Commission.

	Item	PDF
1	2024-2025 Budget Monitoring – Quarter 3	
2	2025-2026 Budget and Council Tax	Y
3	2025-2026 Housing Revenue Account Business Plan	Y
4	Capital Strategy 2025-2026	Y
5	Treasury Management Strategy 2025-2026	Y
6	Housing Compliance Policies (Gas Safety, Electrical Safety, Fire Safety Enclosed Blocks (Low Risk) Building and Fire Safety (High Risk Blocks)	
7	Disposal of Freehold for ongoing use of Affordable Housing PART B	

11. Supplemental Agenda

Any urgent item(s) complying with Section 100(B) of the Local Government Act 1972.

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Crawley Borough Council

Minutes of Overview and Scrutiny Commission

Monday, 25 November 2024 at 7.00 pm

Councillors Present:

M L Ayling (Chair)

H Hellier (Vice-Chair)

O Adeniyi, I Ashraf, N Hilton, G S Jhans, K Khan, R A Lanzer, S Pritchard, D Ramsay and J Russell

Also in Attendance:

Councillors I T Irvine and M G Jones

Officers Present:

Paul Baker	Partnership Services Manager
Vicki Basley	Chief Accountant
Helen Davies	Housing Options Manager
Ian Duke	Chief Executive
Hannah Edwards	Performance, Policy and Project Officer
Heather Girling	Democratic Services Officer
Nick Hobbs	Housing Needs Manager
Carolin Martlew	Head of Corporate Finance
Philip Morris	Sustainability Manager
Nigel Sheehan	Head of Major Projects and Commercial Services
Clem Smith	Head of Economy and Planning

Apologies for Absence:

Councillor I Khan

Procedural Motion to suspend a particular Procedure Rule - to suspend the Vote to Extend the Meeting and Guillotine

The Chair, Councillor Ayling put forward a Procedural Motion in accordance with the General Committee Procedure Rules, to suspend a particular General Committee Procedure Rule, namely the suspend the Vote to Extend the Meeting and Guillotine due to the majority of the reports being policy framework documents and also reports which both the Chair and Vice Chair in discussion believed the Commission should give due consideration to. This was seconded by the Vice Chair Councillor Hellier. The Chair then called for a vote which fell as there were 4 votes

Agenda Item 3

Overview and Scrutiny Commission (29)

25 November 2024

in favour, and 6 votes against and 0 abstentions (Councillor Adeniyi was not in attendance for the item).

1. Disclosures of Interest and Whipping Declarations

The following disclosures were made:

Councillor	Item and Minute	Type and Nature of Disclosure
Councillor R A Lanzer	Tenancy Strategy 2025 to 2029 (Minute 4)	Personal Interest – Member of WSCC
Councillor R A Lanzer	Homelessness Strategy 2025 to 2029 (Minute 5)	Personal Interest – Member of Citizens Advice West Sussex (North East South)
Councillor R A Lanzer	Tenancy Homelessness 2025 to 2029 (Minute 5)	Personal Interest – Member of WSCC
Councillor R A Lanzer	2024-2025 Budget Monitoring Quarter 2 (Minute 6)	Personal Interest – Member of WSCC
Councillor R A Lanzer	Budget Strategy 2025/26-2027/2028 (Minute 7)	Personal Interest – Member of WSCC
Councillor R A Lanzer	Waste and Recycling Scrutiny Panel Final Report (Minute 10)	Personal Interest – Member of WSCC
Councillor R A Lanzer	Waste and Recycling: Changes to Collection Regime and Extension of Waste and Recycling Contract (Minute 13)	Personal Interest – Member of WSCC

2. Minutes

The minutes of the meeting of the Commission held on 4 November 2024 were approved as a correct record and signed by the Chair.

3. Public Question Time

No questions from the public were asked.

4. Tenancy Strategy 2025 to 2029

The Commission considered report [SHAP/091](#) and associated [Appendix A](#) of the Head of Strategic Housing. The report sought approval of the new Tenancy Strategy for 2025-2029.

During the discussion with the Cabinet Member for Housing, the Housing Needs Manager and Performance, Policy and Projects Officer, the following comments were made:

- Acknowledgement that the Council had a statutory obligation to have a Tenancy Strategy.

Agenda Item 3

Overview and Scrutiny Commission (30)

25 November 2024

- Recognition that the strategy incorporated the recommendations from the Housing Associations Scrutiny Panel which was conducted in 2024 and it was noted that Housing Associations were regulated by the Regulator of Social Housing (RSH). The Council had no regulatory powers over the activities of Housing Associations operating within Crawley.
- Clarification sought and provided on affordable rent and local housing allowance levels.
- Acknowledgement that the strategy was a five year document which was dependent on various criteria.
- It was recommended that Cabinet be requested to amend Section 3 of the Tenancy Strategy (Council Approach) to provide further clarity upon timescales ‘households may wait “*many years*” for an offer of suitable housing’. (Suggested amendments in bold to provide further information): ‘households may wait ***several years*** for an offer of ***social housing (dependent on their priority and the availability of properties they are eligible for)***’.

RESOLVED

That the Commission noted the report and requested that the views expressed during the debate, were fed back to the Cabinet through the Commission’s Comment sheet and requested Cabinet consider the proposed amendment noted above.

5. Homelessness and Rough Sleeping Strategy 2025 to 2029

The Commission considered report [SHAP/092](#) and associated appendices [A](#) and [B](#) of the Head of Strategic Housing. The report sought approval of the new Homelessness and Rough Sleeping Strategy for 2025-2029.

During the discussion with the Cabinet Member for Housing, the Housing Options Manager and Performance, Policy and Projects Officer, the following comments were made:

- While the previous strategy did include homelessness prevention as one of its priorities, for the new strategy it was confirmed there was a need to strengthen the focus and to up-stream work to develop more early intervention strategies in order to prevent crisis and increase the resilience of residents in the borough.
- It was noted that the funding for the Rough Sleeping Multi-Disciplinary Team would not be known until the end of the year at the earliest.
- Confirmation sought and obtained regarding the Renters’ Rights Bill, which could potentially bring changes such as ‘no fault’ evictions and have an impact on homelessness. However it was noted details were still forthcoming.
- Acknowledgement that in terms of housing supply, the Crawley Borough Local Plan 2023-2040 identified housing need and identification of the council’s approach to development within the town, this was anticipated to be higher than registered provider delivery, which had generally decreased across the sector.

RESOLVED

That the Commission noted the report and requested that the views expressed during the debate, were fed back to the Cabinet through the Commission’s Comment sheet.

6. 2024-2025 Budget Monitoring - Quarter 2

The Commission considered report [FIN/672](#) of the Head of Corporate Finance. The report set out a summary of the Council's actual revenue and capital spending for the quarters to September 2024 together with the main variations from the approved spending levels and impact on future budgets.

During the discussion with the Leader of the Council, the Head of Corporate Finance and the Chief Accountant, the following comments were made:

- Acknowledgement that slippage of the capital programme (mostly as a result of water neutrality) had resulted in higher balances from higher interest payments. It was noted that without the impact of the water neutrality situation the council would have been able to increase the council's housing supply and ease temporary accommodation pressures.
- It was noted that Chagossian funding had yet to be received and whilst claims had moved onto the DELTA platform last month the update was still outstanding, together with information about additional funding for 2025/26.
- Clarification sought and obtained on planning income along with the flexible housing support grant and the changes to Right to Buy.
- Additional information provided on the options considered with regards to Ashdown House which would balance income to be received and the works required.
- Confirmation was provided on the cost of repairs as these were prioritised within the service as it was important to undertake necessary maintenance to avoid properties falling into disrepair. However it was recognised that there was now a higher awareness of damp and mould throughout the industry.

RESOLVED

That the Commission noted the report and requested that the views expressed during the debate, were fed back to the Cabinet through the Commission's Comment sheet.

7. Budget Strategy 2025/26 – 2027/28

The Commission considered report [FIN/673](#) of the Head of Corporate Finance. The report set out future financial projections along with the policy framework for improving financial efficiency and meeting the long term investment needs of the Town, as well as proposals for the annual budget process..

During the discussion with the Leader of the Council, the Head of Corporate Finance and the Chief Accountant, the following comments were made:

- Acknowledgement that some fees and charges may have to be increased by more than CPI to help close the budget gap and to ensure that services were operating more closely to a cost recovery basis where possible. It was noted that fees and charges would be applied proportionally as possible but were currently under review as part of the budget process.
- Recognition that as a result of the Employers National Insurance contributions increase, the overall impact was anticipated to cost the council in the region of £620k for direct staff. It was noted that compensation was not anticipated to be available for contracted services which would add to service cost pressures in the longer term.
- It was noted there was a proposed amendment in recommendation 2.2 ciii to specify the Council Tax Banding in report FIN/673. The revised wording was as follows (in bold):

2.2 ciii. The current budget deficit of £2.452m for 2025/26 (section 6.2 of report FIN/673) is based on a Council tax increase of 2.99% which is £6.94 **per band D dwelling**. Table 2 (section 6.6.10 of report FIN/673) highlights the budget gap modelling different assumptions.

RESOLVED

That the Commission noted the report and requested that the views expressed during the debate, including the amendment to recommendation 2.2ciii, were fed back to the Cabinet through the Commission's Comment sheet.

8. Treasury Management Mid Year Review 2024-2025

The Commission considered report [FIN/674](#) of the Head of Corporate Finance. The report provided an update on the Council's Treasury Management Strategy for 2024-2025.

During the discussion with the Leader of the Council, the Head of Corporate Finance and the Chief Accountant, the following comments were made:

- It was noted it would be beneficial for the Detailed Holdings (Appendix 2) to feature descriptive column headings and it was commented these would feature in future reports.
- Further information was provided on the council's approach to treasury management and investment, in that investment opportunities were proactively sought, whilst still acting within the council's investment limits.
- Explanation sought and obtained on investments within other sectors together with the risks and implications.

RESOLVED

That the Commission noted the report and requested that the views expressed during the debate, were fed back to the Cabinet through the Commission's Comment sheet.

9. Updated Climate Emergency Action Plan and Climate Emergency Declaration

The Commission considered report [PES/473](#) of the Head of Economy and Planning. The report sought approval for an update to the climate emergency action plan and climate emergency declaration, to include consideration of a nature emergency declaration and application to join the UK100 network.

During the discussion with the Leader of the Council, the Head of Economy and Planning and the Sustainability Manager, the following comments were made:

- Recognition that the update to the climate emergency declaration would enable the Council to prioritise the reduction of those direct Scope 1 and 2 emissions over which the Council had more direct control. The update also recognised the overall need to bring borough-wide emissions to net zero as quickly as possible.
- Acknowledgement that the proposal to join UK100 network of local authorities aimed to build cross party consensus and commitment to action by advocating change to meet net zero, whilst benefiting from sharing knowledge and best practice, whilst shaping future policy. Collaboration and partnership working with others would be essential to deliver net zero, hold each other to account, and speak with a collective voice.

- It was noted that the scope 3 emissions target to be net zero had been moved back to 2045 as the guidance for inclusion in scope 3 emissions had changed and incorporated a different measure. Emissions from leased assets, (both commercial and Crawley Homes) were not included in the analysis of council emissions that formed the evidence base for the original declaration and these scope 3 emissions had increased dramatically. The improvements required would not be able to be reached within original timescales. It was also recognised that currently installed assets that had an embedded carbon footprint still had a life expectancy.
- Recognition that whilst it was key to reduce carbon footprint as quickly as possible, achieving the net zero position was a challenge and the most ambitious element of the declaration was borough-wide emissions, where the council could potentially influence to accelerate decarbonisation across the borough to reach net zero by 2045. It would be important to engage widely across the borough.
- Additional information was provided on the funding source for retrofitting costs and it was confirmed that the council would shortly be bidding for Social Housing Decarbonisation Fund Wave 3.
- The proposal to include a Nature Emergency Declaration was welcomed, as the council had new statutory obligations to protect the natural environment and halt the loss of biodiversity.

RESOLVED

That the Commission noted the report and requested that the views expressed during the debate, were fed back to the Cabinet through the Commission's Comment sheet.

10. Waste and Recycling Scrutiny Panel Final Report

The Commission considered report [OSC/325](#) of the Chair of the Waste and Recycling Scrutiny Panel, Councillor Russell. A Notice of Motion at Full Council in October 2023 proposed setting up a Scrutiny Panel to examine and seek to improve Crawley's household waste recycling rate, taking into account the differing challenges the Borough had in comparison to other areas. A Waste and Recycling Scrutiny Panel was subsequently established in February 2024 to look at how household waste recycling rates in Crawley could be improved. Alongside consideration of options to improve recycling performance, the National Waste and Resources Strategy, Simpler Recycling, was launched in October 2023 and amongst other proposals, confirmed that waste collection authorities will be obliged to move to a separate weekly food waste collection with effect from April 2026. Within this context, a focus for the panel was to consider the efficacy and impact of different collection regime options open to the Council in implementing the National Waste Strategy.

The Panel wished to consider how to maximise impact while recognising budget constraints and the demographic and social economic context which typically influences recycling behaviour and performance. Within this context, the Panel sought to “ find ways to understand impediments to recycling in the borough and also consider ways to inform residents/customers of proposed changes to waste collection and incentivise to maximise levels of recycling”.

During the discussion with the Chair of the Panel, Councillor Russell, and Lead Officers (Head of Major Projects and Commercial Services and the Partnership Services Manager) the Commission raised the following comments:

Agenda Item 3

Overview and Scrutiny Commission (34)

25 November 2024

- It was recognised that recycling within blocks of flats presented a number of challenges. There was currently an audit being undertaken for each block of flats/communal area to determine the specifics, availability, options and opportunities as understanding the current environment was key. The Council worked in partnership with WSCC (as the waste disposal authority) to ensure regional communication, along with that on a local level.
- Whilst research had been undertaken on the use of ‘smart sacks’ in other areas for recycling material, these authorities did not have wheeled bins unlike Crawley. It was determined that providing a constant supply of bags would create more plastic waste, logistical delivery problems and increase supply costs.
- Clarification was sought and obtained with regards to nappy and sanitary product disposal in a hygienic way.
- Confirmation was provided as to measures for dealing with contamination within recycling bin.
- Further discussion took place on the proposed roll out of bins and it was acknowledged that any rollout to varying property type should be a phased approach. It was noted that ensuring bins that were not oversized would be important in encouraging residents to ‘reduce’ waste in preference to recycling.
- It was recognised that clear, strong communications regarding recycling and any proposed changes would be key in order to incentivise and encourage residents to increase recycling and minimise food waste and there were many different communication channels. It was acknowledged that as with any change it would take a while to adapt.
- The Commission amended recommendation 2.2b) to ‘recycling and waste’ in order to mirror the proposed changes in 2.2a, in which the website had been re-named ‘Recycling and Waste’, in order to place recycling at the forefront and thus refocus priorities.

RESOLVED

That the Commission noted the report and requested that the views expressed during the debate, including the amended recommendation, were fed back to the Cabinet through the Commission’s Comment sheet.

11. Forthcoming Decision List - and Provisional List of Reports for the Commission's following Meetings

The Commission confirmed the following reports:

- Housing Policies: (Compensation, Short-term Alternative Accommodation, Stock Condition, CCTV)

The Commission was also due to receive the following items at its meeting on 13 January 2025:

- Safer Crawley Partnership Review and Future Priorities
- Cabinet Member Discussion – Public Protection
- Crawley Town Centre Update Report

12. Exempt Information – Exclusion of the Public

RESOLVED

That in accordance with Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following item of business on the grounds that it involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Act by virtue of the paragraph specified against the item.

13. Waste and Recycling: Changes to Collection Regime and Extension of Waste and Recycling Contract

Exempt Paragraph 3

Information relating to the financial or business affairs of any particular person (including the authority holding that information)

The Commission considered report HPS/045 of the Head of Major Projects and Commercial Services. The report sought approval to analyse options of the waste and recycling service and to introduce the Simpler Recycling Policy mandated by Government determining waste stream to be collected and frequency of collection. The report further proposed options for the extension of the waste and recycling contract.

During the discussion with the Leader of the Council, Head of Major Projects and Commercial Services and the Partnership Services Manager, the following points were expressed:

- Recognition that the National Waste Strategy ‘Simpler Recycling’ mandated waste collection authorities to introduce separate weekly food waste collections to all households by March 2026.
- Acknowledgement that further statutory guidance confirmed that as part of the transfer to a weekly food waste collection, local authorities should provide a minimum fortnightly collection of residual waste (ie no less frequently than every two weeks).
- Support for clear and consistent communications campaign supporting the role out of the separate food waste collection and any subsequent changes in the collection regime to ensure success.
- It was noted that an all Members’ Seminar would be scheduled prior to the introduction of any revised collection arrangements, to enable Councillors to understand the rationale, logistics and roll out programme for the proposed service changes.

RESOLVED

That the Commission noted the report and requested that the views expressed during the debate were fed back to the Cabinet through the Commission’s Comment sheet.

Closure of Meeting

With the business of the Overview and Scrutiny Commission concluded, the Chair declared the meeting closed at 9.07 pm.

M L Ayling (Chair)

Agenda Item 6

Cabinet Member for Public Protection

Service Area Responsibilities:

They will carry out responsibilities with regards to the following service areas:

- a) Licensing.
- b) Community Wardens.
- c) Civil Enforcement Officers.
- d) Off Street Parking and Parking Orders.
- e) Private sector housing regulation.
- f) Community safety and anti-social behaviour (including improvement schemes and liaison with emergency services).
- g) Nuisance and Anti-Social Behaviour (NASB).
- h) Community cohesion.
- i) Prevent duties.

Policy and Strategy Responsibilities:

They will oversee, and where applicable, approve the development of plans, statutory notices and policies within the above service areas, ensuring appropriate consultation occurs on all such proposals, including:

- a) Licensing Policy.
- b) Gambling Policy.
- c) Prevent Strategy.
- d) Crime Reduction and Community Safety Strategies.
- e) Public Space Protection Orders (PSPOs).

Specific Delegations:

They hold, but are not limited to, the following specific delegations:

- a) The approval of criteria for the prioritisation of community safety improvement schemes.
- b) The approval of an annual programme of community safety schemes subject to the proposals being achievable within the limits of the approved financial budget.

Outside Bodies:

They will be a member of the following Cabinet appointed outside bodies:

- a) Patrol Adjudication Committee.
- b) Crawley Prevent Board.
- c) Safer Crawley Partnership Executive.
- d) Sussex Police and Crime Panel (member).

NB. All Cabinet Members may be substitute for another Cabinet Member on any of the Cabinet appointed outside bodies

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Agenda Item 7

Crawley Borough Council

**Report to Overview and Scrutiny Commission
13 January 2025**

**Report to Cabinet
15 January 2025**

Housing Policies: (Compensation, Short-term Alternative Accommodation, Stock Condition, CCTV)

Report of the Head of Crawley Homes, *CH/211*

1. Purpose

- 1.1 To request approval for the attached draft Crawley Homes policies to be adopted to comply Housing Regulation.
- Compensation (Appendix A)
 - Short-term alternative accommodation (Appendix B)
 - Stock Condition (Appendix C)
 - CCTV (Appendix D)

2. Recommendations

- 2.1. To the Overview and Scrutiny Commission:

That the Commission consider the attached policies and decide what comments, if any, it wishes to submit to the Cabinet.

- 2.2 To the Cabinet

That the Cabinet is recommended to:

- a) Approve the policies (Appendices A-D of report CH/211) for adoption and subsequent publication.
- b) Delegate authority to the Head of Crawley Homes, in consultation with the Cabinet Member for Housing, to make amendments to these policies as further changes to legislation and statutory guidance are introduced or following a subsequent review. (Generic Delegation 7 will be used to enact this recommendation).

3. Reasons for the Recommendations

- 3.1. To fulfil regulatory requirement to provide information to tenants about our service, processes and operations, ensuring transparency and accountability.
- 3.2. To ensure that Crawley Homes staff and representatives operate within the law and best practise during the course of their work.

Agenda Item 7

4. Background

- 4.1. Crawley Homes has embarked upon a policy programme aimed at meeting the requirements of the Social Housing (Regulation) Act 2023 including expectations upon social housing providers from both the Regulator of Social Housing and the Housing Ombudsman.
- 4.2. These policies address issues pertinent to customers and that have been identified through analysis of complaints and resident engagement activities and against the Consumer Standards. They form part of Crawley Homes' service plan and will be subject to scrutiny during any regulatory inspection.

5. Description of Issue to be Resolved

- 5.1. Crawley Homes has few existing policies with staff reliance upon internal documents and procedures rather than public-facing documents with monitoring, ongoing update and evaluation and accountability to those affected.
- 5.2. Crawley Homes' service plan identifies the need for these policies to be written, approved and implemented.

6. Information & Analysis Supporting Recommendation

- 6.1. These policies commence a programme of policy development in key areas to meet the expectations upon us as a social landlord
- 6.2. Residents have been consulted widely on these policies, utilising mixed methods such as during engagement events, surveys and via our Tenant and Leaseholder Action Panel. These engagement activities have resulted in recommendations and suggested improvements to our service, which have been reflected in these policy drafts.
- 6.3. These policies are underpinned by an analysis of complaints and the actions set in response to these, with the aim of being fair, learning from outcomes and putting things right, in accordance with the Housing Ombudsman's dispute resolution principles.

7. Implications

- 7.1. There is a need to drive up standards in the sector, of which the implementation of these policies is part. Each policy may attract financial implications as follows:
 - Compensation – the Housing Ombudsman expects us to consider compensation as part of complaint handling and may even make its own orders for compensation if a complaint escalates that far. For example in 23/24 we received one order from the Housing Ombudsman requiring the Council to pay £1,425. There are existing compensation budgets within Crawley Homes, for 24/25 the total budget is £32,000.
 - Short term alternative accommodation – associated costs are already considered and paid but this policy formalises the approach and creates certainty for the resident. As a result we do not expect that costs will increase with any significance. There are also management controls in place to oversee, challenge and verify officer decisions for temporary moves to

Agenda Item 7

help limit demand and ensure that temporary moves are only agreed in exceptional circumstances.

- Stock condition – the cost of stock condition surveyors are already accounted for in budgets following a growth item in 2023/24 in line with report CH/203. However, in the process of developing our understanding of stock condition, capital investment may be required over the longer term to meet requirements of the Consumer Standards and decent homes standards (a revision to the latter is expected).
- CCTV – no additional costs are anticipated as a direct result of this policy but over time we may make further investment in CCTV if there is a proven need for additional security measures at a particular scheme and/or designs for new build properties incorporate CCTV provision which as a result would bring more schemes within the remit of this policy.

- 7.2. Legal – Adoption of these policies will assist all staff to operate within the law. Specific legal advice will be sought as necessary.
- 7.3. Equalities - Equalities Impact Assessments have been carried out for each policy and impacts addressed (Appendix E)
- 7.4. Environmental - The policies consider environmental impacts and the Council’s net zero commitments.

8. Background Papers

None

Report author and contact officer:

Georgia Leigh
Policy and Engagement Manager
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APPENDIX A



Crawley Homes Compensation Policy

Policy Date	
TLAP approval	6.11.24
SMT approval	6.11.24
CMT approval	19.11.24
Cabinet Approval	3.1.25
Review Date	

Contents

1.	Introduction	3
2.	Background and legal context	3
3.	Scope and definitions	4
4.	Policy statement	5
5.	Responsibilities	5
6.	Accessing compensation	7
7.	Financial compensation	8
8.	Other remedies	9
9.	Levels of financial compensation and authorities	10
10.	Complaints or disputes about this policy	12
11.	Equalities implications	12
12.	Environmental implications	12
14.	Staff training, monitoring and review	12

Appendices

	Appendix A: Right to Repair	14
	Appendix B: Compensation claim form	15
	Appendix C: Home loss and disturbance payments	19

1. Introduction

- 1.1. We strive at all times to provide the best landlord service that we can. However, we acknowledge that there are times where our service may fall below expected standards with negative impacts on individuals or their households. Where this is the case, we are committed to putting things right.
- 1.2. The aim of this policy is to explain how we (Crawley Homes) will rectify any service failure in order to restore a person to the position they would have been in had the service failure not occurred. We ask that, if dissatisfied with our service or suffering any ill-effect resulting from our actions or perceived failings, that you raise this with us as soon as possible so that we can take action and assess compensation swiftly, ensuring better outcomes for all parties.
- 1.3. The policy explains the types of compensation and remedy we are able to offer and factors to consider in deciding upon appropriate compensation. This includes circumstances where financial compensation will be offered, as well as other remedies that should be offered where appropriate to the individual merits of the case.

2. Background and legal context

- 2.1. This policy sits within the context of far-reaching changes to the regulation of social housing included in the Social Housing (Regulation) Act 2023. The Act aims to increase accountability and raise standards within social housing.
- 2.2. This policy also draws from the Housing Ombudsman's Complaints Handling Code and Compensation policy and incorporates mandatory compensation measures included in statute.
- 2.3. At all times, we will work within the law and any relevant regulation, including but not limited to:
 - Social Housing (Regulation) Act 2023
 - Equality Act 2010
 - Housing Act 2004
 - Local Housing Authorities (Right to Repair) Regulations 1994
 - Housing Act 1985

3. Scope and definitions

- 3.1. This policy covers damage to individuals, their home or belongings or other impacts of service failure by Crawley Homes and those working on our behalf, such as contractors.
- 3.2. There are three categories of financial compensation that may be applied. These are:
 - **Mandatory** - these are set out by law and include payments for home loss or disturbance or payments under the Right to Repair Scheme for local authority tenants
 - **Quantifiable loss** – these are payments to remedy losses that the resident has suffered, for example paying for alternative accommodation or takeaway food, paying for cleaning resulting from work carried out by our operatives.
 - **Discretionary** – payments made for time and trouble/distress and inconvenience. These could include
 - poor complaint handling
 - delays in providing a service e.g. in undertaking a repair
 - failure to provide a service that has been charged for
 - temporary loss of amenity
 - failure to meet target response times
 - loss of use of part of the property
 - failure to follow policy and procedure
 - unreasonable time taken to resolve a situation
- 3.3. In addition to financial remedies, this policy also has scope to include other remedies to be made, either separately or in addition to an offer of monetary compensation. These can include practical actions (such as offering to undertake repairs or redecoration which would otherwise be a resident's responsibility) or other gesture such as vouchers, chocolates or flowers.
- 3.4. This policy is not intended to replace the need for home contents insurance. We strongly recommend that you take out a policy that is specifically designed for tenants and can offer details of a scheme we are partnered with. Leaseholders are required to take out insurance set out in the terms of the lease.
- 3.5. This policy does not cover damage where there has not been a service failure by Crawley Homes, for example, damage caused by fires, storms or floods that are outside of our control, or where we have fulfilled our repair responsibilities but damage from the initial incident should reasonably be claimed under home contents insurance.

4. Policy Statement

- 4.1. We want people to be able to raise service dissatisfaction with our service swiftly; in a format of their choosing; and to be confident that we will put things right.
- 4.2. We recognise that remedies may not always need to be monetary, but that in some instances, financial compensation may be the only and appropriate form of redress.
- 4.3. This policy must be applied in a proportionate and flexible way, taking into account the particular circumstances of the complaint but also our obligation to consider what represents good value for money for all of our residents. Compensation payments ultimately are drawn from the Housing Revenue Account, which is made up from rental income, and there must therefore be a reasonable and proportionate use of these funds.
- 4.4. We will learn from errors and review service failures to prevent others having a similar experience. Improvements will be reflected in our annual complaints action plan.

5. Responsibilities

- 5.1. All persons working for or on behalf of Crawley Borough Council are responsible for their own professional conduct and fostering a culture in which complaints are actively welcomed as a means of identifying and acting upon necessary service improvement.
- 5.2. **Head of Crawley Homes/Senior Management Team (SMT)**

The Head of Crawley Homes and SMT are responsible for:

- Overseeing the effectiveness and operation of this policy
- Instilling the culture and values of Crawley Borough Council, ensuring that these underpin the customer care ethos of Crawley Homes.
- Monitoring and identifying the root service issues that lead to dissatisfaction and the implementation of service improvements, practice or policy changes to address them.
- Executing their responsibilities under Crawley Borough Council's Complaints policy.
- Specifically, the Head of Crawley Homes has final oversight of all compensation awards resulting from stage two complaints. .

5.3. **Team Leaders/Service Managers**

- Ensuring that team members are familiar with how people can access compensation and what to advise them if they wish to make a claim for compensation.
- Handling stage one complaints and compensation requests that relate to the work of their team.
- Passing complaints and/or compensation requests to be handled and paid directly by the contractor where this is applicable. Crawley Borough Council may instead award the compensation and re-charge this to the contractor.
- Keeping clear records of decisions regarding compensation and how these decisions (whether financial or not, level of award) have been reached and providing a written record of this to the individual concerned.
- Sign off compensation up to the amount of £250.
- Seeking the approval from a member of SMT for amounts higher than £250.
- Where the incident or failure justifies it, Crawley Homes managers may also award compensation up to this amount outside of the formal complaints process. People affected must always be reminded that they can make a complaint instead, should they wish.

5.4. **All staff**

- All staff are expected to follow this policy in determining the appropriateness, value and type of compensation.
- Any person investigating an issue warranting compensation is responsible for overseeing the matter through to completion, including diarising and tracking follow-up action, keeping in communication with the person and checking their satisfaction with the handling of the issue.
- Crawley Homes staff may also award nominal compensation of up to £25 outside of the complaints process where it is clear that there has been a service failure. People must always be reminded that they can make a complaint instead, should they wish.

5.5. **Contractors and third parties**

- Contractors and third parties must abide by any specific contract clauses that set out where compensation is payable or recoverable from them for any failure to undertake any task or instruction or delay in doing so.
- Contractors must ensure awareness of, and comply with, Right to Repair legislation at all times. If they fail to carry out the repair within the prescribed periods, they will be liable for the compensation to the Residents.
- Contractors and third parties must fully co-operate with any enquiry or investigation made by the Housing Ombudsman.

- Contractors and third parties may have their own compensation guidelines but are expected as a minimum to follow this policy in determining the appropriateness, value and type of compensation.
- Persons investigating or awarding compensation on behalf of contractors or third parties will also be expected to oversee the matter to completion, including diarising and tracking follow-up action, keeping in communication with the person and checking their satisfaction with the handling of the issue.
- Contractors and third parties are responsible for ensuring that the terms of any sub-contract reflect these responsibilities
- Crawley Homes may deduct any compensation amount for which the contractor or third party is responsible from any payment due to the contractor or third party or recover this as debt.

6. Accessing compensation

- 6.1. Any resident or person affected by Crawley Homes' landlord service may raise a compensation claim for financial loss, inconvenience or delay that is perceived to be as a consequence of actions by Crawley Homes or failures of service.
- 6.2. Compensation may be accessed in these ways:
 - i. During the course of a complaint. Within our complaints handling procedure, the complainant is invited to tell us their desired outcome. In many instances this will be an apology and action taken to resolve the problem, but this may also include financial compensation. We may also consider compensation as part of an outcome even if the complainant has not expressly requested this, based on our findings, level of service failure and impact.
 - ii. Completing a claim form in specific circumstances, such as home loss or disturbance, out of pocket expenses arising from temporary moves to accommodate repair works, or from emergencies. See Appendix B.
 - iii. Outside of the complaints process, at the discretion of any member of staff who is made aware of a service failure, up to the limits set out in the matrix below.
- 6.3. When making a compensation request, claimants must include full details of why compensation should be considered, including any evidence of impact such as photographs, letters or reports or any receipts for damaged items. It is vital that this evidence is retained until either the compensation request has concluded or they are no longer needed as evidence.

- 6.4. Any request for compensation and any remedy offered will be investigated and responded to in writing. If we decide not to award financial compensation despite a formal request for such, we will explain our decision making when replying formally to the complainant.

7. Financial Compensation

Mandatory compensation

- 7.1. Mandatory compensation is compensation that must be paid in accordance with the law. This includes compensation for home loss, disturbance and compensation under 'Right to Repair' as detailed below:

- i. **Home Loss**

- 7.2. A home loss payment compensates people for the distress and inconvenience where the Council has to permanently move them from their home at a time not of their choosing because it is being demolished or redeveloped. Mandatory home loss payments only apply to permanent moves. Losses arising from moving on a temporary basis, for example to allow repair works are discretionary payments (see below) and covered within our Short-term Alternative Accommodation policy.

- 7.3. If you are in arrears, we may use the home loss payment towards clearing these arrears, with anything remaining being paid to you. This would be determined on a case-by-case basis in light of the circumstances.

- ii. **Disturbance**

- 7.4. Mandatory disturbance payments cover reasonable expenses incurred if a person is permanently displaced from their property. Please see Appendix C for further details. For up to date, current legal advice see www.shelter.org.uk.
- 7.5. For losses as a result of moving into temporary alternative accommodation, see our policy on Short-term Alternative Accommodation.

- iii. **Right to Repair**

- 7.6. Certain types of repairs qualify for the Right to Repair scheme. These are known as 'qualifying repairs.' These include insecure windows and doors, unsafe power sockets or electrical fittings, leaking roofs and broken entry phone systems. A full list of the qualifying repairs and the financial payments are set out in Appendix A. This scheme only applies to the qualifying repairs that Crawley Homes is responsible for and for repairs that do not exceed an estimated cost of £250.

- 7.7. We may inspect the repair to decide if it ‘qualifies’ and we will write to you if it does not.
- 7.8. The maximum available payment for repairs under the right to repair scheme is £50.00.

Discretionary Compensation

i. Quantifiable loss

- 7.9. This form of financial compensation is not mandatory. It repays people for any financial costs they have suffered as a result of a service failure by Crawley Homes.
- 7.10. Consideration will be made of how necessary, reasonable and justifiable requests are for quantifiable losses. These requests will not be honoured if they are considered to be excessive, and we do ask that some evidence is provided, such as receipts, bank statements or bills that demonstrate the actual loss to the person.
- 7.11. We will usually refer residents to their insurance company in the first instance to claim personal losses under home contents insurance, and if we are liable we would compensate for excess payments or increased premiums.

ii. Non-quantifiable loss

- 7.12. These are payments that take into account losses that are not quantifiable, such as for distress or inconvenience. To decide upon an appropriate discretionary compensation offer, we will take into account a number of factors such as:
- The length of time or level of disruption
 - Any impact that is worsened due to disability, age or the presence of young children or any other factors.
 - Unquantifiable financial loss that would have not occurred if the service failure hadn’t happened.
 - Distress and inconvenience to the person
 - Actions of the person, household or visitor, which may have contributed to any loss
 - The levels of compensation awarded for similar cases by the Housing Ombudsman.

8. Other Remedies

- 8.1. Any investigation of a complaint must take into account the outcome or remedy that the resident would like. Our complaints handling process allows for full

discussion of desired outcomes and our investigation explores each issue of concern raised and our response or action in full.

8.2. Depending on the situation, compensation may not always be financial, or could include both financial and non-financial remedies. Other remedies may prove to be powerful by affirming and acknowledging the impact upon the person, and preventing this experience being repeated. Non-financial remedies may include:

- An apology
- Acknowledgement that things have gone wrong through no fault of the individual or household
- Providing an explanation, assistance or reasons
- Taking action if there has been delay, for example to bring forward the expected action
- Reconsidering or changing a decision
- Amending a record or adding a correction or addendum
- Changing policies, procedures or practices

9. Levels of financial compensation and authorities

9.1. The matrix below will be applied to help determine what gesture or compensation is appropriate and who may authorise it.

9.2. These are guides and maximum limits for consideration, rather than fixed amounts (except where stated) and will be based upon the facts of the case and liaison with the person(s) affected.

9.3. The definition of what would be considered a low, moderate or severe impact can vary between individuals and should bear in mind the customer's own description and evidence of loss and their desired outcome, as well as advice of colleagues and reference to similar cases.

9.4. Specific calculations may also apply in certain circumstances such as loss of a room or amenity. Thresholds for amounts that can be authorised remain the same, and therefore payments over a certain amount must always be checked with the person who has the authority to authorise.

Level of CBC responsibility for service failure	Likely impact on the individual or household and who may authorise			
	None/minor	Low	Moderate	Severe
None/unclear	Support and assistance All staff	Support and assistance, up to £25 or a non-financial gesture. All staff	Support and assistance, up to £25 or a non-financial gesture. All staff	Support and assistance, up to £25 or a non-financial gesture.
Partial	Financial or non-financial Service Manager/complaint handler to review Up to £25 per service failure or discretionary payment. Up to a maximum of £75	Financial or non-financial Service Manager/complaint handler to review Up to £25 per service failure, or discretionary payment. Up to a maximum of £75	Financial or non-financial Service Manager to review Up to £25 per service failure or discretionary payment Up to a maximum of £100	Financial or non-financial Service Manager to review Up to £25 per service failure or discretionary payment - Up to a maximum of £250
Full	Financial or non-financial Service Manager/complaint handler to review Up to £25 per service failure or discretionary payment Up to a maximum of £75	Financial or non-financial Service Manager to review Up to £25 per service failure or discretionary payment Up to maximum of £100	Financial or non-financial SMT member to review Up to £25 per service failure or discretionary payment Up to maximum of £250	Financial or non-financial SMT to review with CBC senior colleague if stage one complaint. Or Head of Service Up to £25 per service failure or discretionary payment based upon case

10. Complaints or disputes about this policy

- 10.1. If you feel that this policy has been applied incorrectly you can escalate this through the council's complaints policy [Complaints | Crawley GOV.](#)

11. Equalities Implications

- 11.1. An equalities impact assessment has been completed.

12. Environmental Implications

- 12.1. Any remedial action will need to bear in mind considerations around waste, resources and the Council's commitment to net zero.

13. Consultation

- 13.1. All policies are subject to resident consultation. As a minimum this includes each policy being placed before our Tenant and Leaseholder Action Panel (TLAP) for scrutiny, and drawing upon feedback gained through resident engagement activities. Wider consultation will also take place depending upon the nature, complexity or impact of a policy.
- 13.2. Details of consultation can be found in the Equality Impact Assessment relating to the policy and in consultation summary documents where consultation has been more wide-ranging.
- 13.3. All policies must also have agreement of SMT and Cabinet.

14. Staff Training, Monitoring and Review

- 14.1. We want to know about dissatisfaction with our services whether through contact with our officers; making a complaint or offering thoughts or suggestions through our resident consultation channels. We will use this information to assess our performance and identify common themes or concerns with aspects of our service. We will apply this learning to future reviews of this policy.
- 14.2. By delivering a consistent standard, acting on feedback, understanding residents' needs and preferences and inviting tenant scrutiny of our service we

aim to reduce the likelihood of service failings where compensation becomes necessary.

14.3. All staff of Crawley Homes are expected to undertake as a minimum the following training, which will support the application of this policy:

- Housing Ombudsman’s Dispute Resolution Training 1 and 2
- Crawley Borough Council’s suite of customer care training – parts 1, 2 and 3
- Equality, Diversity and Inclusion training
- A suite of training around potential issues affecting residents and their wellbeing, including mental health awareness and neurodiversity.

Appendix A: Right to Repair

Under the Right to Repair Scheme, tenants have the right to have small, urgent repairs carried out within a specific timescale. These repairs and expected timescales are listed below. The repair must have an expected value of less than £250 for this scheme to apply.

What happens if the work isn't done in time?

If the repair work isn't done within the specified time limit, you may ask for another contractor, approved by the landlord to do the work instead. We will issue the repair to the alternative contractor and send you a copy. We can only use contractors on our list.

What happens if I am not in when the contractor calls?

If you're not at home to let the contractor in as arranged, the scheme no longer applies.

What is a 'qualifying repair?'

Qualifying repairs under the Right to Repair scheme for local authority tenants:

Repair type	Response time(working days)
Total loss of electric power	1
Partial loss of electric power	3
Unsafe power or lighting socket or electrical fitting	1
Total loss of water supply	1
Partial loss of water supply	3
Total or partial loss of gas supply	1
Blocked flue to open fire or boiler	1
Heating or hot water not working between 31 October and 1 May	1
Heating or hot water not working between 1 May and 31 October	3
Blocked/leaking foul drain, soil stack or toilet	1
Toilet not flushing (if there is only one toilet in the property)	1
Blocked sink, bath or basin	3
Tap cannot be turned	3
Leak from a water pipe, tank or cistern	1
Leaking roof	7
Insecure external window, door or lock	1
Loose or detached banister or handrail	3
Rotten timber flooring or stair tread	3
Door entry phone not working	7
Mechanical extractor fan not working	7

Claiming compensation under Right to Repair

If the second contractor doesn't do the repair work within the time limit, you are entitled to receive £10 in compensation. For every extra day you wait, you will receive another £2. The most compensation you can receive under the right to repair scheme is £50.

This is not a definitive guide to the law. You are advised to contact an independent, free advice service such as CAB for further information.

Appendix B: Compensation Claim Form

This compensation claim form should be used to make a claim for damage to individuals, their home or belongings or other impacts of service failure by Crawley Homes, Contractors and those working on our behalf.

It may also be used to claim for reasonable expenses you have incurred if you have been required to leave your home for necessary works to take place.

Please note that you must notify us of your potential claim as soon as you have incurred the expenses or become aware of damage or loss. We may not accept responsibility for any alleged losses if you do not notify us in good time.

Claims for loss or damage:

- **You must ensure that you keep any damaged items you are claiming for as evidence** of your claim until your claim has been settled.
- **You will need to support your claim with as much evidence as possible**, such as time stamped photographs of any damage, bills, receipts or evidence of the cost of any items to be replaced.
- We will only consider compensation payments where loss or damage is as a result of us failing to deliver a service
- Tenants and leaseholders are expected to take out contents insurance and to pursue claims through your own insurers for damage where we are not directly responsible, and have fulfilled our obligations as a landlord.

Claims for expenses:

- If you are claiming for direct expenses you have incurred, such as for food, fuel or travel, you **must** provide a receipt or bill for each transaction.

Crawley Homes has partnered with a very competitive home contents insurance provider, designed especially for tenants. For information, please contact your Housing Officer.

Claim for Compensation

Please note that the issue of this form does not constitute acceptance of liability.

Please complete **ALL** questions as accurately as possible.

Full name of claimant:	Address:
Daytime Telephone Number:	Date of Birth:

Are you a Council tenant? Yes No

Leaseholder: Yes No

Do you have any contents insurance? Yes No

If Yes, please provide the name and address of the insurance company and the policy number:

Do you have any ongoing or previous claims against the Council? Yes No

If Yes, please provide details:

Details of this claim

Item	Date of Purchase	Purchase price or amount claimed for damaged item	
		£	P

Please send copies of receipts, photographs or evidence with your claim.

You should keep any damaged items you are claiming for until your claim is settled.

Details of damage or expense incurred and why you believe Crawley Borough Council or our contractor/third party to be responsible:

Declaration

I/We declare that the details above are true and complete.

Signed:

Date:

Appendix C: Home Loss and Disturbance Payments

Home Loss Payments

To qualify for a mandatory home loss payment, you must:

- have been living at the property for at least 12 months before the date we move you. If you have not lived at the property for 12 months you may still be entitled to a pro-rata disturbance payment.
- be moving away from your existing home permanently.

Only one home loss payment will be made per property, whether it is an individual or joint tenancy. We will usually only make a home loss payment by direct bank transfer and only to the person(s) named on the tenancy agreement. We will only pay this after the move has taken place, and within three months of receipt of claims, whichever is latest.

This mandatory payment is fixed by Section 30 of the Land Compensation Act 1973 and is reviewed annually.

Disturbance Payments

Typical items which can be claimed for disturbance include, but are not limited to those set out below. Whether you are able to claim will depend upon your circumstances and any proof of losses.

The burden of proof for any losses claimed is with the person claiming. This means that the onus is on you to be able to justify any claim.

It is of vital importance that you keep a detailed record of any losses of costs associated with moving from your home. You should keep all relevant evidence such as receipts, invoices or quotes.

Items which could be claimed for include:

- special adaptations to your replacement property
- altering soft furnishings and moveable fittings and fixtures to fit your new home
- disconnection and reconnection of services such as telephone or utilities
- forwarding of post (for a reasonable period)

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APPENDIX B



Short-term Alternative Accommodation

Policy Date	
TLAP approval date	6.11.24
SMT approval date	
Cabinet approval	
Review Date	

Contents

1.	Introduction	3
2.	Background and legal context	3
3.	Policy statement	3
4.	Responsibilities	4
5.	Circumstances leading to short-term alternative accommodation	5
6.	Alternative accommodation options	6
7.	When a more permanent move may be considered	7
8.	Tenure	7
9.	Preparation and practical support	7
10.	Return to the resident's home	8
11.	Expenses and moving services	8
12.	Payment of rent during a temporary move	9
13.	Housing costs	9
14.	Record keeping	9
15.	Complaints or disputes about the policy	9
16.	Equalities implications	9
17.	Environmental implications	10
18.	Consultation	10
19.	Staff training, monitoring and review	10

Appendix A: Short Term Alternative Accommodation Plan

1. Introduction

- 1.1. This policy sets out Crawley Homes' approach to accommodating residents on a temporary basis if their home becomes unoccupiable for a short period of time. This might be because it has become unsafe, is subject to repairs or planned works needing the property to be vacant, or due to an emergency.
- 1.2. The policy does not cover unusual circumstances such as where a property is to be demolished, or large-scale redevelopment or regeneration of an area, to which different arrangements and mandatory compensation awards apply. It does, however, include limited circumstances where a permanent move may be considered.
- 1.3. The policy sets out what residents can expect, under what circumstances and how we will ensure that this transition is as smooth as possible, without causing them undue disruption and difficulty.

2. Background and legal context

- 2.1. This policy sits within the context of far-reaching changes to the regulation of social housing included in the Social Housing (Regulation) Act 2023. The Act aims to increase accountability and raise standards within social housing.
- 2.2. At all times, we will work within the law and any relevant regulation, which also includes but is not limited to the:
 - Building Safety Act 2022
 - Housing Act 2004
 - The Decent Homes Standard:
 - Housing Health and Safety Rating System (HHSRS)
 - Equality Act 2010

3. Policy statement

- 3.1. We consider that any move away from a person's home, for works to take place, should only be considered as a last resort and in exceptional circumstances. Wherever possible our teams and contractors should endeavour to work around the resident in their home, taking steps to minimise disruption and ensure that their needs are met.

- 3.2. Wherever possible we encourage residents to consider staying with family or friends, but we will always consider their own wishes and circumstances.
- 3.3. If short-term accommodation is sought, it may not be of the same size and specification as the resident's existing home, due to the need to act quickly and reliance upon what property is available at the time. However, we will ensure that we meet the requirements of the Equality Act and all statutory minimum household requirements.
- 3.4. Decants are emotive and need to be handled sensitively and thoroughly to ensure the resident can return to their home in a timely manner. We will ensure that works are completed as quickly as possible, and that costs and disruptions are minimised (without impacting on quality) whilst ensuring clear channels of communication.
- 3.5. Our objective is to offer alternative accommodation on a temporary basis and residents would be expected to return home on completion of the works.

4. Responsibilities

- 4.1. **All staff** are responsible for raising any health and safety concerns or hazards within a resident's home.
- 4.2. **The Operations and Maintenance Manager or Asset Manager** is responsible for notifying the Tenancy Services Team that alternative accommodation is to be sought and for coordinating the work with all parties so that the temporary move is as short as possible.
- 4.3. **The Tenancy Services Team** will support residents with practical, financial and other arrangements and provide a named point of contact for the duration of the move. Specifically they will be responsible for:
 - Identifying the needs, preferences and circumstances of the resident and their family and coordinating a plan that best meets these needs
 - Issuing a license agreement/ non-secure tenancy (as applicable) for the ongoing accommodation
 - Supporting with the move or continuation of claims for Housing Benefit/Universal Credit payments
 - Clearly informing the resident of their responsibilities, for example to continue to pay any rents and charges agreed.

4.4. **The resident is responsible for:**

- Meeting the conditions under which the accommodation is let. This would normally be a non-secure tenancy, but for shorter-term moves, a license agreement, or any booking conditions of external short-term rental accommodation.
- Continuing to pay rent on either their main home or short-term accommodation
- Paying utility payments such as gas, electricity, internet, and phone bills (charges made when the resident is not living at their original accommodation may be claimed back.)
- Following any processes agreed around, for example, access to their main home, safekeeping or storage of possessions
- Support will be provided with these responsibilities if this is identified as a need during planning of the move.

5. Circumstances leading to short-term alternative accommodation

Emergencies such as fires or floods that make the home uninhabitable.

- 5.1. In the event of an unplanned incident such as a fire or a flood, where the long-term outcome is not known, we will work closely with housing allocations to address immediate and ongoing housing need.

Poor or uninhabitable condition

- 5.2. If an inspection or visit reveals a home is in poor condition or uninhabitable, we will assess the level of hazard under the Housing Health and Safety Rating System (HHSRS) against the potential impact on the resident(s.) Examples might include where any HHSRS hazard present could have a significant effect on a member of the household due to them having a health condition (such as a respiratory condition that presents heightened risk from damp and mould.)

Planned works requiring an empty property

- 5.3. Occasionally it may be necessary to carry out extensive repair works to a property that require it to be vacant and cannot wait for the current resident to move permanently. Short-term accommodation may also be considered necessary where medical information suggests that an impact upon an existing health condition or cause disruption that the resident would not be able to manage.

6. Alternative accommodation options

6.1. The accommodation provided will depend on several factors such as the expected length of works and the housing needs of the resident. If the resident has insurance, and damage prevents them being able to stay in the home, short term accommodation costs may be covered by their policy. If this is not appropriate the housing officer will consider the needs of the household with the resident and look at options such as:

- Stay with family and friends
- Stay in hostel/hotel or holiday 'service-let' provided by the Council
- Stay in alternative Council accommodation on an insecure basis from any empty stock
- Stay in the sheltered guest room if the move is short-term and the resident is eligible (over 55.)

7. When a more permanent move may be considered

7.1. Our intention is to move people only temporarily from their home due to the upheaval and potential emotional impact of moving permanently. However, in rare circumstances, and in full consultation with the resident(s) concerned, it might be more appropriate to work with Housing Allocations Team to enable a permanent move property. These are when:

- A significant amount of work is needed on a property that is considered unsuitable for the resident's needs (e.g. overcrowding or under occupying)
- Where the resident or a member of the household would be negatively impacted by the insecurity or experience of moving temporarily to another property, for example as a result of age, disability or for health reasons.
- The proposed works are likely to take more than 6 months to be completed.
- The resident requests that their temporary property becomes a permanent transfer. A transfer in these circumstances is covered by the Council's Allocations Policy and not decided by Crawley Homes. Alternatively, a permanent offer can be granted at the discretion of the Head of Crawley Homes as a management transfer. We cannot guarantee that this will be possible but will consider these requests, particularly if the ongoing accommodation is more suitable. We will not consider this if the need for the move is caused by intentional damage to the original property.

- 7.2. In these circumstances, mandatory home loss and disturbance payments may not apply, and further advice will need to be taken. However, disturbance payments may be made on a discretionary basis.

8. Tenure

- 8.1. Residents who move from their home temporarily will be offered a licence or non-secure tenancy dependent on the circumstances. If the move is intended to be very short term, we will usually offer a licence, but if intended to last over a longer period (one-six months) we will usually offer a non-secure tenancy.

9. Preparation and practical support

- 9.1. We will ensure that residents are consulted about the proposed temporary move, with clear information about why this is necessary, how long this is likely to be for, and when they can return to their home.
- 9.2. In each instance, the resident will be given a single point of contact in the event of concerns and to receive regular updates.
- 9.3. The Housing Officer or other named contact will work with the resident to create a plan and assessment of the needs of the household, including where any protected characteristics and reasonable adjustments need to be considered. This will highlight individual circumstances such as reasonable distances from work, family, or schools wherever possible, and steps to minimise disruption.
- 9.4. The plan will also cover access arrangements whilst the resident cannot occupy their home. Once the move to the new accommodation has taken place, residents must not be expected to provide access for contractors, tradespeople and out of hours and must be able to expect to live peacefully away from the disruption. Equally, for any work to take place quickly and efficiently, contractors and tradespeople will require clear, uninterrupted access, so any arrangements for collecting items, including post, or visiting the property must be clearly set out and agreed by all parties involved.
- 9.5. This plan will include contact preferences for updates and set out a regular check in to share any concerns, progress and timescales should these change.
- 9.6. Responsibility for any furnishings and possessions left in the main home will be set out in the plan.

- 9.7. The plan will be made and reviewed whatever onward accommodation is chosen to ensure that it remains suitable; for example to reassess suitability over time if a resident has gone to stay with family or friends, or if circumstances such as school places have changed.

10. Return to the resident's home

- 10.1. Before a resident returns to their home, a thorough inspection and health and safety check will be completed. Any outstanding minor touches will be communicated with the resident with timescales for completion.

11. Expenses and moving services

- 11.1. Residents who are temporarily moved will be entitled to reimbursement for reasonable expenses associated with the move. This may include:

- Meal vouchers / meals if decanted into a property without cooking facilities such as a hotel
- Additional travel costs as a result of moving location
- Subsistence payments if staying with family/friends
- Reconnection costs associated with internet/satellite
- Washing facilities or laundry arrangements if no facilities are available
- Mail redirection services
- Provision of window coverings such as curtains or blinds and poles/rails if not provided

- 11.2. The items/services for which the Council will agree to pay will be assessed on a case-by-case basis by the Housing Officer and Area Housing Manager based on the type of accommodation the resident will be moving to and the reason for the move, for example, what would be considered reasonable if the damage or concern prompting the move has been caused by the resident.

- 11.3. As far as possible, these expenses will be agreed ahead when the support plan is made. If items or provisions can be directly purchased by Crawley Homes or an allowance paid upfront, we will make efforts to do so to avoid hardship to the resident.

- 11.4. Receipts, invoices or other proof must be provided for any items to be reimbursed. The resident should also not incur any costs without first

agreeing the amount with the Council. If the resident does not do this, they risk the refusal to pay for the item and/or the full amount incurred.

- 11.5. If the resident chooses to make their own arrangements rather than accept assistance from the Council, the Council will reimburse them only up to the value the Council would have agreed to pay had the resident accepted assistance.

12. Payment of rent during a short-term move

- 12.1. If an alternative property is offered on a temporary (insecure) basis to allow the works to be completed, the resident will be expected to continue paying rent on the lower of the two properties and charges on the other property will be suspended. This will ensure that they are not financially disadvantaged by any temporary move.
- 12.2. The Housing Officer will liaise with the relevant internal departments regarding Council Tax arrangements and change of address details.

13. Housing costs

- 13.1. Residents are not able to claim Universal Credit housing costs or Housing Benefit on more than one home. The resident will only pay rent on one property, and this will be on the Crawley Homes property where they are a tenant.

14. Record keeping

- 14.1. Clear records must be made of all contacts, calls or meetings with the resident concerning their move and any queries during the period.
- 14.2. This information will be recorded as a CRM contact in the Council's housing management system.

15. Complaints or disputes about the policy

- 15.1. If you feel that this policy has been applied incorrectly you can escalate this through the council's complaints policy [Complaints | Crawley GOV](#).

16. Equalities implications

- 16.1. An equalities impact assessment has been completed to ensure that no group is negatively impacted due to possessing any protected characteristic. It is envisaged that the robust planning and contact arrangements set out in

this policy will pay due regard to equalities by ensuring that any needs arising from a protected characteristic can be effectively identified and acted upon.

17. Environmental implications

- 17.1. Environmental implications include the need to reduce the consumption of energy, fuel and single-use items as a result of implementing this policy. For example, we will need to ensure that the short-term move does not require the purchase of items that cannot be reused, excess vehicle transport due to location of the new accommodation or replacement e.g. of carpets, furniture or soft furnishings unnecessarily.
- 17.2. This policy does make possible work which otherwise would not be possible with the resident in situ – for example major refurbishment works to create better insulated, warm and energy efficient homes.

18. Consultation

- 18.1. All policies are subject to resident consultation. As a minimum this includes each policy being placed before our Tenant and Leaseholder Action Panel (TLAP) for scrutiny, and drawing upon feedback gained through resident engagement activities. Wider consultation will also take place depending upon the nature, complexity or impact of a policy.
- 18.2. Details of consultation can be found in the Equality Impact Assessment relating to the policy and in consultation summary documents where consultation has been more wide-ranging.
- 18.3. All policies must also have agreement of SMT and Cabinet.

19. Staff training, monitoring and review

- 19.1. All staff of Crawley Homes are expected to undertake as a minimum the following training, which will support the application of this policy:
 - Housing Ombudsman’s Dispute Resolution Training 1 and 2
 - Crawley Borough Council’s suite of customer care training – parts 1, 2 and 3
 - Equality, Diversity and Inclusion training
 - A suite of training around potential issues affecting residents and their wellbeing, including mental health awareness and neurodiversity.

Appendix A: Short Term Alternative Accommodation Plan

Short Term Alternative Accommodation Plan

PART A: IDENTIFYING NEEDS

This plan aims to address the needs of the household, including any reasonable adjustments needed to minimise loss and disruption arising from short-term relocation from the home.

1. Name of tenant/joint tenants:
Current address:
Contact phone number(s)
Email address(es)
Staff note: please ensure that these details are accurate on Active H

2. Household members and ages: Continue onto a separate sheet if necessary.	
Name	Age

--	--

<p>3. Do any members of the household have specific requirements relating to a health condition, disability, religious requirement or to protect their safety and wellbeing? Please provide details: Continue onto a separate sheet if necessary. Please provide any evidence as requested.</p>	
Name	Requirement

<p>4. Does any member of the household travel regularly to school, work, family commitments, voluntary work, place of worship any other regular commitment?</p>	
Name	Requirement

5. Do you have any other circumstances, issues or concerns you would like to us to consider?

Signed Tenant	Signed Crawley Homes
Date:	Date:

PART B: DETAILS OF ACCOMMODATION AND ASSISTANCE

1. Name of tenant/joint tenants:
Temporary address:
Contact phone number(s) for duration of move (if changed)
Email address(es) for duration of move (if changed)
Staff note: please ensure that these details are accurate on all housing management and financial systems.

<p>How will needs identified in Part A be met? Have the needs identified in part A been met through the ongoing accommodation? If not, what mitigation is possible, for example if there are no cooking facilities what can be offered instead?</p>		
<p>Identified Need List all applicable</p>	<p>Crawley Homes will:</p>	<p>The resident will:</p>

<p>Expenses and limits agreed: Do not include expenses that are already covered by existing arrangements e.g. bus travel that is already covered by an existing bus pass. Calculate only the excess cost over and above the cost of the resident had stayed in their own home.</p>		
<p>Expense</p>	<p>How has expense been arrived at</p>	<p>How applied? E.g. daily, per mile, per week</p>

Is any assistance needed to move essential items? (Please bear in mind that this is a short-term move of limited duration and we can only support reasonable costs. This would not normally include any furniture unless specifically adapted)

Food provision/cooking facilities

Safekeeping of personal effects, furniture and belongings

Arrangements for the safe relocation or covering of furniture and personal belongings. The resident is responsible for relocating items that may be damaged or removing personal or valuable items where it is possible to do so.
Please set out any expected actions for the contractor or assistance that is needed by the household.
Please include any photographs of the condition of significant items/decoration.

Accessing your home

You are not expected to provide access for contractors, tradespeople or out of hours. If any request is made, please direct this to your housing officer or the duty housing officer.

Tradespeople will require clear, uninterrupted access to your home and to protect site safety. You will not be able to visit without prior arrangement so please make sure that you take all essentials with you.

If a regular visit is required, what will the arrangements be?	
If I need to arrange a one-off visit, I will contact:	
Name	Contact details
How much notice do they require?	
Arrangements for collecting or redirecting post:	

Meter readings at point of departure * as applicable
<p>Electric</p> <p>Gas</p> <p>Water</p>

Signed Tenant	Signed Crawley Homes
Date:	Date:

PART C: CONTACT ARRANGEMENTS

Staying in touch

Agree who will update you, how, when and how regularly during the course of the work

--

Details of contact/updates to resident

Date	Contact by whom and notes

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Crawley Homes Stock Condition Policy

Policy Date	
TLAP approval	
SMT approval	6.11.24
CMT approval	19.11.24
Cabinet Approval	3.1.25
Review Date	

Contents

1. Introduction	3
2. Legal Context	4
3. Definitions	5
4. Policy statement	6
5. Survey content	7
6. Partnership working.....	8
7. Complaints or disputes about the policy	8
8. Equalities implications	8
9. Environmental implications	8
10. Staff training, monitoring and review	9
11. Consultation	9

1. Introduction

- 1.1. This stock condition policy sets out how we will assess the condition of our housing stock to ensure the wellbeing and safety of residents and maximise the efficiency of our maintenance investment programmes.
- 1.2. At Crawley Homes we recognise that our housing assets are integral to providing happy customers and healthy homes. It is vital that we proactively monitor and manage the condition of our homes to uphold our commitment to quality housing provision.
- 1.3. Reference within this policy to residents includes both council tenants and leaseholders.
- 1.4. A list of key definitions and acronyms is set out in Appendix A.

2. Background and Legal Context

Legal Framework:

- 2.1. Our Stock Condition Survey programme operates within local, regional, and national legislation governing housing standards; landlord obligations; and tenant rights. This includes but is not limited to:
 - Building Safety Act 2022
 - Housing Act 2004: Establishing minimum standards for residential properties, including safety, amenities, and maintenance requirements.
 - Landlord and Tenant Act 1985: Outlining the rights and responsibilities of landlords and tenants, including the provision of safe and habitable living conditions.
 - The Decent Homes Standard: Sets a minimum standard for all social housing. Ensuring a property is in a reasonable state of repair, having reasonably modern services, providing a reasonable degree of thermal comfort. The standard defines a decent home as being free from most serious health and safety hazards, such as fall risks, fire risks, or carbon monoxide poisoning.
 - Health and Safety Regulations: Ensuring compliance with health and safety standards to safeguard residents against hazards and risks including The Housing Health and Safety Rating System (HHSRS).
 - HHSRS: Risk assessment procedure that is the statutory element of the Decent Homes Standard.
 - Data Protection Laws: Safeguarding the privacy and confidentiality of tenant information collected during the stock condition survey, in accordance with data protection regulations. To be read in conjunction with Crawley Borough Council's associated policies and procedures.

Regulatory Compliance:

- 2.2. Our Stock Condition Survey policy aligns with regulatory requirements.

- Social Housing (Regulation) Act 2023: Adhering to specific regulations and guidelines regarding property standards and tenant welfare.
- Housing Ombudsman Service: Committing to fair and transparent dispute resolution mechanisms in accordance with the principles outlined by the Housing Ombudsman Service.

Tenant Rights and Engagement:

- 2.3. Central to our policy is the protection of tenant rights. We uphold the principles of:
- **Right to Information:** Ensuring tenants are informed about the purpose, process, and outcomes of stock condition surveys, promoting transparency and accountability.
 - **Right to Participation:** Providing avenues for tenant involvement in survey planning, implementation, and review processes, fostering a collaborative approach to property management.
 - **Right to Redress:** Offering accessible channels for tenants to raise concerns, lodge complaints, and seek resolution for issues identified during surveys, in line with regulatory requirements and best practices.

Ethical Considerations:

- 2.4. Beyond legal obligations, our policy is guided by ethical principles of integrity, fairness, and respect for human dignity. We pledge to:
- Uphold the highest standards of ethical conduct in all aspects of property management, including survey administration, data handling, and tenant interactions.
 - Prioritise the well-being and best interests of tenants, recognising their inherent right to dignified and safe housing conditions.

3. Policy statement

- 3.1. We will carry out Stock Condition Surveys, collecting asset data and resident information over a rolling three-year programme.
- This programme will help prevent minor issues from escalating into major problems, ultimately saving costs and resources overall. The data collected will be used to run a preventive maintenance model to upgrade component items before they fail.
- 3.2. We are committed to:
- **Comprehensive Assessment:** Conducting thorough and programmed surveys within this cycle.
 - **Data-Driven Decision Making:** Using survey findings to inform strategic decision-making, including prioritising maintenance activities, budget-allocation, and long-term asset management plans.

- **Tenant Engagement:** Engaging with tenants throughout the survey process to ensure their voices are heard, and their concerns are addressed.
 - **Compliance and Regulatory Adherence:** Ensuring full compliance with relevant legislative and regulatory requirements, maintaining the highest standards of safety, accessibility, and sustainability.
 - **Continuous Improvement:** Continuously reviewing and refining our survey methodologies and procedures to enhance effectiveness, efficiency, and accuracy over time.
- 3.3. By implementing this policy, we demonstrate our commitment to providing happy customers and healthy homes, prioritising the well-being and satisfaction of our residents above all else.

4. Priority groups and areas

- 4.1. To ensure that preventative maintenance measures are implemented where they may be needed most, our stock condition survey programme will prioritise several target groups and areas:
- Households that include people with health, disability or other specific requirements
 - Homes where repairs are under-reported
 - Homes where there has been a high repair demand
 - Homes with reported damp and mould
 - Areas where decarbonisation funding could be available
 - Homes that have not had an asset or stock condition survey within the last three years

5. Survey content

- 5.1. Stock condition surveys will identify:
- Work that needs to be included in future planned works
 - Work that may be needed in the future
 - Repairs that need doing now
 - Items and areas to be checked include:
 - Smoke / heat alarms, carbon monoxide alarms
 - Extractor fans or ventilation systems.
 - Doors and windows
 - Kitchens, bathrooms
 - Roofs and loft spaces
 - To check any water tanks and fire breaks.
 - Exterior and internal walls
 - Communal areas in blocks of flats.
- 5.2. This list is not exhaustive.

- 5.3. Where a resident requests an inspection by a surveyor for major works, the surveyor will carry out a stock condition survey to the property at the same time to minimise appointments for resident and prevent duplicate visits.
- 5.4. Although this policy is aimed at assessing the condition of dwellings, wherever possible surveyors will also include communal areas in blocks of flats and garages in the area,
- 5.5. Photographs will be taken of the areas inspected.

6. Access

- 6.1. We want to ensure each property is inspected in a timely manner. We aim to work with our residents as flexibly as possible to make sure that appointments can be managed alongside their needs. This includes choice over the time that the survey will take place, but also the offer of direct contact details for customers to instigate a stock condition survey at their own convenience.
- 6.2. Methods of contact and procedures for no access are included in Appendix A.

7. Stock condition survey feedback

- 7.1. Feedback from the survey will be given in writing to residents setting out the main findings.
- 7.2. A satisfaction survey will be sent to each resident following the stock condition survey so we can gather feedback directly from residents to understand what we are doing well and if there any areas we can improve.

8. Partnership working

- 8.1. Internally, all Council teams have a role to play in ensuring that our homes are safe, well-maintained and issues are attended to. In particular, we will work closely with Housing Management, Cleaning and Clearance, Community Protection, Neighbourhood Services, and the Anti-Social Behaviour Team to resolve concerns found onsite that may not be strictly repairs-related.
- 8.2. We also work closely with external agencies such as West Sussex County Council, occupational therapy Connect and any other provider who may support customers in their homes should this need be identified.

9. Record keeping

- 9.1. As part of the principle of 'making every contact count' customers will be invited to update information about family composition, contact details and any individual needs, preferences or protected characteristics. Customers may decline to give this

information and opt to be contacted instead by a housing officer or other trusted member of Crawley Homes.

- 9.2. All data collected during the survey, whether customer details, photographs or notes of the customer contact will be stored securely on our housing management system and treated inline with Crawley Borough Council and Crawley Homes' Privacy Notices, the e Data Protection Act 2018 (the Act) and the General Data Protection Regulation (GDPR).

10. Complaints or disputes about the policy

- 10.1. If you feel that this policy has been applied incorrectly you can escalate this through the council's complaints policy [Complaints | Crawley GOV.](#)

11. Equalities implications

- 11.1. An Equality Impact Assessment has been undertaken and has identified some actions to ensure accessible communication about the process, expectations and access.
- 11.2. We will ensure that the font size is legible, and a braille option is available. For residents whose first language is not English, we will provide a translation service if needed. We will also ensure that we communicate with nominated third parties or carers to ensure that they are fully updated to ensure we can effectively communicate with the resident.
- 11.3. Despite these potential communication needs or preferences, the overarching intent to provide safe and well-maintained homes for all our residents and the prioritisation of target categories of residents will better ensure that needs are met.

12. Environmental implications

- 12.1. The data collected from the Stock Condition Survey Programme will form the basis of the future decarbonisation programme and the decarbonisation strategy for Crawley Homes.
- 12.2. Collecting asset data from stock condition surveys in local government can have several environmental implications, both positive and negative:
- **Resource Consumption:** Conducting surveys may require the use of paper, electronic devices, transportation, and energy, which can contribute to resource consumption and carbon emissions. Minimising paper usage and employing energy-efficient methods can mitigate these impacts.
 - **Data Accuracy:** Accurate data collection can lead to more efficient asset management, reducing the need for unnecessary maintenance and replacements, which in turn can minimise resource consumption and waste generation.

- **Long-Term Sustainability Planning:** Gathering comprehensive data enables Crawley Homes to develop sustainable asset management strategies, such as prioritising investments in energy-efficient programmes or implementing renewable energy solutions.

12.3. Overall, whilst there are potential environmental implications associated with collecting asset data from stock condition surveys, proactive measures can be taken to minimise negative impacts and maximise the benefits to both the environment and to residents.

13. Staff training, monitoring and review

13.1. Training required for the Surveyors undertaking the Stock Condition Surveys will include:

- Working at height
- Lone working
- Survey completion and use of the Council's Housing Management System
- All training identified as 'core' on Crawley Homes' training matrix, including Equality and Diversity, customer care and safeguarding awareness.

13.2. Training requirements will be monitored and enhanced as required by the Council.

13.3. We will monitor the effectiveness of the programme by reviewing customer feedback via customer satisfaction surveys.

13.4. We will also monitor our approach through comments and complaints received, collating and reviewing feedback from residents.

14. Consultation

14.1. All policies are subject to resident consultation. As a minimum this includes each policy being placed before our Tenant and Leaseholder Action Panel (TLAP) for scrutiny, and drawing upon feedback gained through resident engagement activities. Wider consultation will also take place depending upon the nature, complexity or impact of a policy.

14.2. Details of consultation can be found in the Equality Impact Assessment relating to the policy and in consultation summary documents where consultation has been more wide-ranging.

14.3. All policies must also have agreement of Crawley Homes' SMT (Senior Management Team) and Cabinet.

Appendix A: Definition of Terms

Decent Homes

Standard set by the Government regarding the quality of social housing. A home is considered decent if it meets certain criteria, including being in a reasonable state of repair, having modern facilities, being free from hazards, and providing a reasonable degree of thermal comfort.

Equalities Impact Assessment (EIA)

An assessment to identify whether there are any positive or negative impacts associated with the policy. If negative impacts are identified, then the policy should say how these will be addressed.

Fit for human habitation

Refers to the condition of a residential property being suitable and safe for people to live in. It encompasses various factors such as structural integrity, sanitation, cleanliness, ventilation, heating, and protection from hazards like dampness or fire.

General Data Protection Regulation (GDPR)

It is a comprehensive data protection law enacted by the European Union to regulate the processing of personal data of individuals. GDPR aims to strengthen data protection and privacy for individuals, giving them more control over their personal data and imposing strict obligations on organisations that handle such data.

Housing Health and Safety Rating System (HHSRS)

A risk-based evaluation tool used in the UK to assess potential health and safety hazards in residential properties. The system helps local authorities identify hazards that could affect a resident's health or safety, such as dampness, fire risks and structural defects.

Net Zero

Refers to achieving a balance between the amount of greenhouse gasses produced and the amount removed from the atmosphere. This balance is typically achieved by reducing emissions and offsetting any remaining emissions through measures like carbon capture or investments in renewable energy projects. The goal of net zero is to mitigate climate change by preventing further accumulation of greenhouse gasses in the atmosphere.

Appendix B: No Access Protocol – Stock Condition Surveys

We will offer appointments between 08:00 to 17:00 Monday to Friday.

We will offer a morning or afternoon appointment, or the opportunity of a specific appointment time slot if necessary.

If these appointment times are unsuitable, under special circumstances we may make an appointment outside of these time frames.

We will initially write to residents with an overview of the stock condition survey programme and email and telephone details to request an appointment if preferred. Otherwise we will write to tenants offering them an appointment. This letter will include the appointment date and time slot plus contact details to change the appointment time if necessary.

Communication ahead of the stock condition survey

A phone call will be made to confirm the appointment before the survey.

A text will be sent 24 hours before the appointment reminding the resident of the appointment.

If no access is provided

If no access is provided to the property, a second letter will be issued with an appointment date and time slot.

The letter will provide details to reschedule to an alternative time should they require. The letter will inform the resident that if they fail to give access, this could lead to injunction proceedings. We will work with colleagues in housing management to ensure a sensitive and appropriate approach .

If no access is made from the second appointment, a third and final appointment time slot will be arranged, and a letter sent. This will warn of potential injunction proceedings if access is not granted.

If access is still not given, then legal proceedings will be issued, an injunction warning letter will be sent to enforce access.

Where resident have support needs, health conditions, communication needs or other factors underpinning the lack of access, a sensitive approach will be taken. This will be reviewed on a case-by-case basis and further support, if required, will be assessed with the housing officer.

Where access is not provided, we will liaise with the gas service team to try and arrange a joint appointment for access for both the stock condition survey and the gas service to ensure compliancy.

If legal proceedings are issued, an Equality Act 2010 assessment will be completed with the housing officer for that area.

APPENDIX D



Crawley Homes CCTV Policy

Policy Date	
TLAP approval	10.6.24
SMT approval	6.11.24
CMT approval	19.11.24
Cabinet Approval	
Review Date	

Contents

1.	Introduction.....	2
2.	Background and Legal Context	2
3.	Policy statement	2
4.	Roles and Responsibilities.....	3
	All staff and users of CCTV equipment	3
	Data Protection Officer (DPO).....	3
	Head of Crawley Homes.....	3
	Compliance, Health and Safety and Building Safety Manager	3
	Tenants and Leaseholders	4
5.	Camera locations and coverage	4
6.	Access to Images	4
7.	Third party requests for footage	5
8.	Data Protection and Subject Access Rights	5
9.	Retention Periods	6
10.	Private (domestic) installations.....	6
11.	Disputes or concerns regarding private installations.....	7
12.	Complaints or disputes about this policy	8
13.	Staff training, monitoring and review	8
14.	Equalities implications.....	8
15.	Consultation.....	8

1. Introduction

- 1.1 This policy applies to CCTV that is installed and used by Crawley Homes, which is Crawley Borough Council's landlord service
- 1.2 It outlines our use of CCTV placed in communal areas of our premises for the purpose of assisting with law enforcement, public safety and other functions. This policy sets out how we will comply with law and regulation in this area.
- 1.3 This policy also covers private (domestic) installation of CCTV or surveillance by our residents, leaseholders and shared owners, and the processes that must be followed in order for secure permission to install these systems.
- 1.4 This policy covers only CCTV that is the responsibility of Crawley Homes. It does not include CCTV surveillance in the wider public realm operated by Crawley Borough Council in conjunction with Sussex Police. These cameras are viewed and monitored by Sussex Police and any request to view CCTV footage should be made to Sussex Police via a Rights of Access Request.
- 1.5 A separate policy applies to body-worn cameras which are owned by the Safer Crawley Partnership and are worn by a limited number of operatives within our cleaning and clearance team.
- 1.6 A list of key definitions is set out in Appendix A.

2. Background and Legal Context

- 2.1 Technological advances and widened access have led to greatly increased surveillance activity, both by organisations in pursuit of their work, and individuals operating private systems. This increases the potential for breaches to privacy and the law relating to these systems.
- 2.2 Crawley Homes will abide at all times with the requirements and principles of all relevant legislation and codes of practice, including:
 - The Human Rights Act 1998
 - Protection of Freedoms Act 2012
 - The Data Protection Act 2018
 - The UK General Data Protection Regulation
 - Biometrics and Surveillance Commissioner's Surveillance Camera Code of Practice Amended Surveillance Camera Code of Practice (accessible version) - GOV.UK (www.gov.uk)
 - We will closely follow case law in our decision making regarding private installation of surveillance equipment, and in particular, the judgement in Fairhurst vs Woodard 2021.

3. Policy statement

- 3.1 We (Crawley Homes) operate CCTV within the parameters of Crawley Borough Council's Data Protection Policy and will comply with all relevant statutory guidelines and legislation applicable to us.
- 3.2 We use CCTV for the following purposes:
- To provide a safe and secure environment for residents, staff and visitors
 - To prevent the loss of or damage to public spaces, buildings and/or assets
 - To assist in the investigation of antisocial behaviour
 - Capturing evidence to support breach of tenancy and
 - To assist in the detection and prevention of crime and with law enforcement.
- 3.3. We will ensure that any installation or use of CCTV is proportionate to the impact of crime, loss, or antisocial behaviour, and carefully balances individuals' rights to privacy with our responsibilities as a landlord. As such, any installation, whether by or on behalf of Crawley Homes, or privately installed with our permission, will be carefully assessed, monitored and its impact assessed.

4. Roles and Responsibilities

All staff and users of CCTV equipment

- 4.1 All staff and users with operational access to CCTV equipment are responsible for:
- Compliance with all procedures in this policy.
 - Reporting to management any CCTV equipment that is not working correctly or in accordance its purpose or appears to have been tampered with.

Data Protection Officer (DPO)

- 4.2 The Head of Governance, People and Performance acts as the Data Protection Officer for Crawley Borough Council and is responsible for:
- Maintaining Crawley Borough Council's Corporate CCTV Register.
 - In conjunction with the Head of Crawley Homes, ensuring that a CCTV Privacy Impact Assessment is completed prior to the approval and installation of any CCTV within Crawley Homes
 - The investigation of any breaches of CCTV data (recordings and images)
 - Responding to Subject Access Requests (SAR) by individuals
 - In cases of a serious breach involving CCTV data, the DPO is responsible for reporting the matter to the Information Commissioners Office (ICO.)

Head of Crawley Homes

- 4.3 The Head of Crawley Homes is accountable for ensuring the legitimate need and appropriate use of CCTV within Crawley Homes, including:
- Overseeing completion of a CCTV Privacy Impact Assessment. Where there is a high risk to personal privacy, this must be completed in conjunction with the Data Protection Officer. This ensures robust consideration of risks and the actions required to protect personal privacy.
 - Ensuring that appropriate consultation has taken place before installation of new CCTV systems.
 - Overall approval of installations, taking full account of evidence from the Privacy Impact Assessment and consultation feedback.
 - Authorising persons who may access, download or delete CCTV footage.

Compliance Manager

- 4.4 The Compliance Manager is responsible for:
- Approval or retrospective approval of applications from residents for privately owned (domestic) cameras or surveillance equipment (including smart doorbells) at Crawley Homes properties (as set out in Appendix B of this policy)
 - Ensuring the maintenance and effective operation of Crawley Homes' CCTV surveillance equipment, so that it can be used and accessed in accordance with its intended purpose and in compliance with the law.
 - These tasks may be delegated to Crawley Homes' mechanical and electrical surveyor or compliance surveyor, in line with their role description and responsibilities.

Tenants and Leaseholders

- 4.5 Tenants and leaseholders are responsible for ensuring they have the correct permissions, as set out in this policy, before installing private CCTV or any form of surveillance equipment within or in the grounds of their home (including smart doorbells.)
- 4.6 Compliance with all legal requirements under GDPR and DPA and Code of Practice outlined in section two.

5. Camera locations and coverage

- 5.1 Prior to the installation of any new council CCTV equipment, a CCTV Privacy Impact Assessment (PIA) will be conducted to ensure that the proposed installation is compliant with legislation and ICO guidance.
- 5.2 All CCTV installations and their locations will be recorded on Crawley Homes' CCTV Register. This is reviewed annually to ensure that any CCTV systems placed in these locations remain proportionate and fit for their intended purpose.
- 5.3 On occasion, Crawley Homes may access temporary or mobile surveillance. This will be subject to the same legal requirements and considerations within this policy.

5.4 Any use of surveillance equipment must be accompanied by clear, compliant 'CCTV in operation' signage, setting out the purpose and contact details of the operator.

6. Access to Images

6.1 As CCTV recordings contain personal (and sometimes special category) data, there is a legal obligation to ensure that access is limited to those with a genuine need and that any data held meets technical requirements for information security. In the event of a data breach, prompt steps will be taken in accordance with the Council's procedures to mitigate the breach and to notify relevant parties.

6.2 Only relevant, authorised persons are permitted access to images obtained via CCTV. Authorisation is determined by the Head of Crawley Homes and recorded on Crawley Homes' CCTV register. No other individual will have the right to view or access any CCTV images and to do so would be considered a disciplinary matter.

6.3 Authorisation is based upon job position, the level of sensitivity of the information being viewed, and the purpose for viewing. Viewing is only permitted on a need-to-know basis, in order to investigate suspicious, illegal or antisocial activity. Currently, those permitted to access and view Crawley Homes' CCTV footage are limited to:

- Head of Crawley Homes
- Public Protection and Enforcement Manager
- Community Protection Operations Manager
- Antisocial Behaviour Team Manager
- Compliance Manager
- Compliance Surveyor
- Tenancy Services Manager, for CCTV within our neighbourhood housing stock and hostels
- Older Persons Service Manager, for CCTV within our sheltered schemes
- Area Housing Managers for each specific patch

6.4 In rare instances where one of the above-named persons are unable to review footage within the necessary timeframe, they may give documented permission to a delegated individual, provided that there is clear justification to do so and that the individual has appropriate Level Two CCTV operator's training. They must agree this via a request form to be held with the viewing log.

6.5 Any staff action relating to the operation, viewing or downloading of CCTV must be logged, including the name, date, time and purpose of the action. This includes any actions which change the field of vision, any downloads or deletion of footage. The record must be made as soon as possible after the action. This will be a record of access only and will not include details of what has been seen or any identifying details.

6.6 Some CCTV equipment in operation by Crawley Homes can be accessed remotely, including, for example, on a mobile phone or computer. Any remote operation, viewing or downloading will be logged in the same way as if doing so on site.

6.7 Any action relating to the viewing of images will be made away from public view, e.g. in a private room with no unauthorised persons present, in order to protect the privacy of the images.

7. Third party requests for footage

- 7.1 We work closely with the police, enforcement authorities and other agencies in order to detect illegal or antisocial behaviour and ensure the safety of our communities. These organisations may apply to us to view images or captured footage in order to fulfil their statutory duties or legal functions. To access CCTV footage, a request must be made in writing, including, where applicable, a crime number or case reference details to DPO@crawley.gov.uk or to

The Data Protection Officer
Crawley Borough Council
Town Hall
The Boulevard
Crawley
RH10 1UZ

- 7.2 We will acknowledge receipt and ask for any further information we need to enable us to process your request.
- 7.3 We will only release footage for the purpose for which it was recorded, set out in section three of this policy, within 28 days of the incident, and in accordance with the law.

8. Data Protection and Subject Access Rights

- 8.1 Individuals whose personal data has been captured on CCTV have a right to access a copy of this data, unless an exemption applies within the law. The following rights apply:
- The right to make a Subject Access Request (SAR) for a copy of footage in which they are captured, subject to exemptions within the Data Protection Act 2018. However this must also be balanced against the rights and freedoms of others who may appear in that footage.
 - The right to object to processing where they believe that the field of vision or the siting of the camera is disproportionate to the stated purpose of the camera.
- 8.2. All subject access requests (SAR) will be reviewed by the Crawley Borough Council's Data Protection Office (DPO) and determined in accordance with the law.
- 8.3. Where there is an objection to the processing or siting of CCTV, the Council will consider the objection and review whether a lawful basis for processing can still be justified. Please visit [Data Protection rights request | Crawley GOV](#) for further details regarding how to make a request under your data protection right

9. Retention Periods

- 9.1 Crawley Homes' cameras are usually set to automatically over-write footage between 28 and 31 days after it is captured.
- 9.2 Where authorised bodies are granted access to data from surveillance cameras in order to carry out their statutory duties, copies may be made and provided securely for this purpose.
- 9.3 If footage is required for enforcement action or to support a case, it will be kept until the relevant case is closed or two years, whichever is the shortest.
- 9.4 These retention periods also apply to any footage or recordings passed to us from private installations, devices or recording equipment to assist with evidence collection, for example in investigation of antisocial behaviour cases.

10. Private (domestic) installations

- 10.1 Tenants and leaseholders must ask permission before the installation of any recording equipment, including CCTV cameras or smart doorbells. As a landlord, we are responsible for ensuring that your equipment does not cause a nuisance or disproportionate intrusion to others, and that the installation will not cause damage to communal walls or areas, safety or fire integrity of the building.
- 10.2 To request permission, please go to [Permissions for improvements | Crawley GOV](#) or contact us on 01293 438000.
- 10.3 If equipment has been installed without permission, retrospective permission must be sought. Any damage caused to the building by the installation will be rechargeable to the tenant.
- 10.4 We will grant any permissions in writing, setting out what equipment is covered and requirements for its installation, use and removal. The installation will be monitored to ensure our requirements are adhered to.
- 10.5 If the proposed equipment will capture recordings from outside the tenant or leaseholder's property boundary (for example, neighbouring homes or gardens, shared spaces or public areas) GDPR and the DPA requirements will apply. The tenant or leaseholder who owns the equipment is the person responsible for complying with the law.
- 10.6 The potential to capture images or recordings outside of the property boundary would not in itself prevent permission being given. We will base decisions on a range of factors including:
 - Any less intrusive remedy that can be explored with the householder - for example would additional security or lighting help or is there a housing management issue that could be resolved without the need for surveillance?
 - Can the camera/doorbell be sited in a different position, or privacy settings, filters or blocks used?
 - What the intention is for requesting to install equipment. If there is any concern from neighbours or any likelihood that its use would be inflammatory or disproportionate, we will refuse permission.

- Has the equipment been requested or supplied by a law enforcement agency or requested as a means of gathering evidence for a case?
- The signing of an agreement that the owner will abide by their responsibilities under data protection law, which are:

1. You must tell people that they are using recording equipment; for example a sign or letting those affected know. In most cases, it is best to inform your neighbours directly and ask if they would have any objection;
2. In most circumstances you must provide some of the recording if asked by a person whose images have been captured;
3. You will regularly or automatically delete footage;
4. In most circumstances you will delete recordings of people if they ask; and
5. If it is possible to do so, you will stop recording a person if they object to being recorded, For example, if you can point the camera in a different direction but still use it for the same purposes, e.g. keeping their property safe.

10.7 If you do not follow these requirements, you could be subject to regulatory action by the Information Commissioner's Office (including a fine) and could face legal action from individuals affected.

11. Disputes or concerns regarding private installations.

11.1. If you have specific concerns about privately installed CCTV systems or smart doorbell operation, we suggest the following action as recommended by the Information Commissioner's office:

1. **Talk to the person concerned** in the first instance. If you would rather not speak with them in person, try writing a letter.
2. **Ask what the reason is for using CCTV** – If you understand why they are recording, it may put your mind at ease. You might even come to an agreement where you share the system. You can then both benefit from the camera's safety features.
3. **Explain your concerns** – the CCTV user may not understand why you are worried about being recorded. If you explain your reasons, they may change the position of the cameras.
4. **Ask to see what area is being recorded** –the footage captured by the camera may not be as intrusive as you think. Seeing an example of what the camera records may make you feel less concerned.

- 11.1 If you believe that the user of the CCTV is breaching data protection rules, you can complain to the Information Commissioner's Office.
- 11.2 If you are concerned that the equipment is being used inappropriately, or is causing nuisance, alarm or distress, you may also report this to our antisocial behaviour team to investigate. This may result in permission being revoked or renegotiated to bring it in line with the intention of this policy and prevent breaches of privacy. We will always take a proportionate and fair approach to resolve any concerns.
- 11.3 If you have concerns about the inappropriate filming of children or vulnerable people, please report this to the police immediately.

12. Complaints or disputes about this policy

- 12.1 If you feel that this policy has been applied incorrectly you can escalate this through the council's complaints policy [Complaints | Crawley GOV.](#)

13. Staff training, monitoring and review

- 13.1. All employees for Crawley Borough Council receive GDPR training during induction. Additionally, any individual with approval to access footage and recordings will receive further training to ensure appropriate safeguards. This will include level two CCTV operator training as well as sufficient training to operate the specific equipment they will access.
- 13.2. Training requirements will be reviewed annually and as part of induction of new employees to specific, related roles.
- 13.3. This policy will be reviewed every three years or in line with changing legislation or regulatory requirements. Incidents, cases and complaints involving CCTV will be considered within this in order to monitor the effectiveness of our approach and its impact upon tenants, leaseholders and shared owners.

14. Equalities implications

- 14.1 An Equalities Impact Assessment has been completed in the development of this policy and no negative impacts have been identified.

15. Consultation

- 15.1 All residents have the right to share their views and influence Crawley Homes' policy decisions. During the development of this policy, this included online surveys and consultation with our Tenant and Leaseholder Action Panel (TLAP)
- 15.2 All policies have the agreement of Crawley Homes' Senior Management Team, and the Portfolio Holder for Housing.

Appendix 1: Definition of Terms

To aid the understanding of this document and the provisions of the Data Protection Act the following definitions are provided for assistance:-

CCTV stands for Closed Circuit Television. CCTV systems are designed to monitor a limited area. They are primarily used for surveillance and security purposes. Over time, CCTV technology has advanced significantly, incorporating new features and functionalities such as remote monitoring, motion detection, and face recognition.

Data is any information held or recorded in any form by a public authority.

Data Controller means the Council as the organisation who determines how data is processed.

Data Processor means any person, other than an employee of the Council, who processes data on behalf of the data controller

Data Protection Act (DPA) 2018 controls how your personal information is used by organisations, businesses or the government.

The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

Everyone responsible for using personal data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

Under the Data Protection Act 2018, you have the right to find out what information the government and other organisations store about you. These include the right to:

- be informed about how your data is being used
- access personal data
- have incorrect data updated
- have data erased
- stop or restrict the processing of your data
- data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

You also have rights when an organisation is using your personal data for:

- automated decision-making processes (without human involvement)

- profiling, for example to predict your behaviour or interests

Data subject is the individual about whom personal data is processed.

GDPR is the General Data Protection Regulation. The UK GDPR sits alongside the DPA 2018

Personal Data means Data which relates to a living individual who can be identified- (a) either directly from that data, or (b) indirectly from that data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

Privacy Notice means a notice created by the data controller and made available to the data subject which explains how personal data is being processed.

Special category data (Sensitive Personal Data) means personal data consisting of information as to any of the following:-

- racial or ethnic origin
- political opinion
- religious beliefs or other beliefs of a similar nature
- membership of a trade union
- genetics;
- biometrics (where used for ID purposes);
- physical or mental health or condition
- sexual life or sexual orientation.
- personal data relating to criminal allegations, proceedings or convictions.

Processing means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data including organisation, adaptation or alteration, disclosure and destruction of the information or data and includes onward disclosure or sharing.

APPENDIX E Equality Impact Assessments to accompany Housing Policies

Compensation Policy EIA

1. Introduction

Division:	Crawley Homes
Name of activity:	Compensation Policy
Type of activity:	A new policy or strategy
Completed by:	Georgia Leigh
Date completed:	28/10/24
Date approved by Head of Service	Click or tap to enter a date.

2. About the activity

Please note the term “activity” is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.

What is the main purpose of the activity? <i>Please explain in a short paragraph</i>
A framework for when compensation should be considered, what reasonable compensation would be and who has the authority to decide it.
Why is it being introduced / reviewed / changed? <i>This could be, for example because of new government legislation or guidance, changing services user needs, or financial reasons</i>
There is a clear need for some guidance and understanding of authorities in order to make reasonable recompense for service failures but also to protect the Housing Revenue Account from inappropriate compensation awards. Compensation has been a focus for the Housing Ombudsman, who offers guidance on what should be the contents of the policy and to whom we report on our complaints handling, remedies and actions. It has been highlighted by TLAP, our Tenants and Leaseholders Action Group as an issue warranting attention, through their recommendations from their complaints handling subgroup, and by the Overview and Scrutiny Committee (OSC) and cabinet, in response to our complaints handling data.

<p>In order to meet the Transparency and Accountability consumer standard, it is necessary to have clear resident-facing policies.</p> <p>The Housing Ombudsman's dispute resolution principles are that landlords act fairly, put things right and learn from mistakes. The compensation policy sets out how we will do this when things go wrong.</p>	
<p>Who is the intended audience or target group?</p>	
Internal audience or group:	Staff & Councillors
External audience or group:	Residents who use a particular service (please specify below)
<p>If other, please specify below and provide details how the audience or target group will benefit?</p>	
<p>Crawley Homes Residents</p>	
<p>Have you already consulted on / researched the activity? <i>Please provide a brief explanation of the work that has been undertaken and any key findings / data. Are there any gaps that need further investigation?</i></p>	
<p>Our annual complaints performance and service improvement report 2023-4 looked at the different remedies offered to complainants and found that these varied widely, and also that financial compensation was offered significantly fewer times at stage one than at stage two, often leading to stage two complaints.</p> <p>We have invited scrutiny of complaints from TLAP and have feedback from TLAP'S complaints subgroup that compensation awards are sometimes excessive and sometimes inadequate and that a framework is needed to offer fairness and transparency. There have also been occasions where financial compensation was not the most appropriate remedy. We have taken this on board in the drafting of this policy.</p> <p>We have taken on board recommendations from the Housing Ombudsman, based upon their review of evidence in the wider sector.</p> <p>TLAP, SMT and Portfolio have commented on the final draft.</p>	

3. Assessing potential impact

When undertaking your assessment, it is important to think about every stage of the process regarding the activity. This includes the design phase, consultation, delivery phase and post completion of the activity. Information about the protected characteristic groups as defined by the Equality Act is available [here](#). You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

Impact on people with a protected characteristic Is there a potential positive or negative impact based on the following?	
Age (older / younger people, children)	Positive
Disability (people with physical / sensory impairment or mental disability)	Positive
Gender reassignment (the process of transitioning from one gender to another.)	Positive
Marriage & civil partnership (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognised for same-sex couples)	Positive
Pregnancy & maternity (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	Positive
Race (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	Positive
Religion & belief (religious faith or other group with a recognised belief system)	Positive
Sex (male / female)	Positive
Sexual orientation (heterosexual, gay, lesbian, or bisexual,)	Positive
Whilst Socio economic disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	Negative

What evidence has been used to assess the likely impacts? <i>(e.g. demographic profiles, research reports, academic research, benchmarking reports, consultation activities, staff surveys, customer surveys, public surveys, complaints, grievances, disciplinary cases, employment tribunal cases, ombudsman cases, media reports)</i>
Ombudsman research and spotlights, complaints data at stage one and stage two, ombudsman cases. These demonstrate the need for an approach which takes into account the personal impact on the person who has experiences service failure and the level that this impacts them. Taking this personalised approach will lead to a positive impact on those sharing the above protected characteristics as their unique experience will be taken into account.
What resource implications are there to deliver actions from this EIA?

<i>(Quantify: people, time, budget, etc.)</i>
<p>Training on this policy – all staff will need an understanding of their own authorities and limitations in order to deliver this policy correctly and improve customer experience.</p> <p>Budget The Housing Ombudsman expects us to consider compensation as part of complaint handling and may even make its own orders for compensation if a complaint escalates that far. For example in 23/24 we received one order from the Housing Ombudsman requiring the Council to pay £1,425. There are existing compensation budgets within Crawley Homes. It is likely that budgetary implications will be neutral as compensation awards stabilise and are fairly applied; however, this will need to be monitored.</p>

4. Outcome following initial assessment

Does the activity have a <u>positive</u> impact on any of the protected groups, or contribute to promoting equality, equal opportunities and improving relations within target groups?	Yes
<p>The policy offers additional ways for service failures to be rectified other than having to raise a formal complaint – a process which some customers might be deterred from using due to language, access to resources or time constraints.</p> <p>It brings some level of transparency and accountability in order to be able apply compensation fairly and monitor access to redress.</p>	
Does the activity have a <u>negative</u> impact on any of the protected groups, i.e. disadvantage them in any way?	Yes
<p>The policy potentially has a negative impact for residents who do not have recourse to home contents insurance or due to low income or disadvantage cannot access this or believe that they cannot.</p> <p>This is not a change to the existing position but may lead to a more rigid enforcement of the expectation to claim on insurance.</p>	

5. Decision following the initial assessment

Continue with existing activity or introduce new / planned activity	Yes
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Amend activity based on identified actions	No
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Has the EIA identified any positive or negative impact on any of the protected groups which requires action? <i>e.g., adjustments to the approach or documents, changes to terminology, broadening parameters of policy, etc. If so, record any actions to be undertaken and monitored</i>			
Impact identified	Action required	Lead Officer	Deadline
Access to other remedy for loss or damage/insurance	Ensure that low cost, specialist insurance for tenants of social housing is promoted at all opportunities and that tenants are periodically reminded.	Clare Prosser	Ongoing

6. Monitoring & Review

How do you propose to monitor and review the impact of your proposal? <i>Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are.</i>
This policy will be reviewed every three years or sooner if there are changes to legislation or regulation. Complaints data, including compensation awards will be reviewed each three months.

Date of last review or Impact Assessment:	11/11/24
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Date of next 12-month review:	11/11/25
Date of next 3-year Impact Assessment (from the date of this EIA):	11/11/27
Date Sent to HR and Organisational Development Team:	Click or tap to enter a date.

Short-term alternative accommodation EIA

1. Introduction

Division:	Crawley Homes
Name of activity:	Short-term alternative accommodation
Type of activity:	A new policy or strategy
Completed by:	Georgia Leigh
Date completed:	13/11/24
Date approved by Head of Service	Click or tap to enter a date.

2. About the activity

Please note the term “activity” is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.

What is the main purpose of the activity? <i>Please explain in a short paragraph</i>
To clarify the circumstances and arrangements when a resident needs to be moved into short term alternative accommodation during works or emergencies affecting their home.
Why is it being introduced / reviewed / changed? <i>This could be, for example because of new government legalisation or guidance, changing services user needs, or financial reasons</i>
There is no previous policy and there is a need to ensure that all staff are operating within the law and regulatory requirements. . There is a clear need for some guidance to all parties about minimising the need for the disruption, expense and distress that can arise from moving people out of their homes on a short-term basis to undertake work on their home. The Housing Ombudsman has made this a focus, with there being high profile maladministration findings in relation to the handling of complaints about this process. Complaints made to Crawley Homes include service failures and miscommunications in this area and the annual complaints review highlighted the need for a clear policy as an action. TLAP, our Tenants and Leaseholders Action Group have also highlighted concerns and contributed to the development of this policy. Additionally, the Transparency and Accountability consumer standard, requires clear resident-facing information, of which this policy is a part.

Who is the intended audience or target group?	
Internal audience or group:	Staff & Councillors
External audience or group:	Residents who use a particular service (please specify below)
If other, please specify below and provide details how the audience or target group will benefit?	
Crawley Homes Residents	
Have you already consulted on / researched the activity?	
<i>Please provide a brief explanation of the work that has been undertaken and any key findings / data. Are there any gaps that need further investigation?</i>	
<p>We have taken on board recommendations from the Housing Ombudsman, based upon their review of evidence in the wider sector.</p> <p>TLAP scrutinised the policy and made some recommendations. TLAP, SMT and Cabinet have commented on the final draft.</p> <p>Some language, clarity and process issues have been identified and addressed as a result of these recommendations.</p>	

3. Assessing potential impact

When undertaking your assessment, it is important to think about every stage of the process regarding the activity. This includes the design phase, consultation, delivery phase and post completion of the activity. Information about the protected characteristic groups as defined by the Equality Act is available [here](#). You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

Impact on people with a protected characteristic	
Is there a potential positive or negative impact based on the following?	
Age (older / younger people, children)	Positive
Disability (people with physical / sensory impairment or mental disability)	Positive

Gender reassignment (the process of transitioning from one gender to another.)	Neutral
Marriage & civil partnership (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognised for same-sex couples)	Neutral
Pregnancy & maternity (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	Neutral
Race (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	Positive
Religion & belief (religious faith or other group with a recognised belief system)	Positive
Sex (male / female)	Positive
Sexual orientation (heterosexual, gay, lesbian, or bisexual,)	Positive
Whilst Socio economic disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	Neutral

<p>What evidence has been used to assess the likely impacts? <i>(e.g. demographic profiles, research reports, academic research, benchmarking reports, consultation activities, staff surveys, customer surveys, public surveys, complaints, grievances, disciplinary cases, employment tribunal cases, ombudsman cases, media reports)</i></p>
<p>Ombudsman research and spotlights, complaints data at stage one and stage two, ombudsman cases. These demonstrate the need for a person-centered approach that addresses the ways that residents could be disadvantaged by this process and to identify and prevent this. Without this approach, those with a protected characteristic could be disproportionately affected by moving from their home. Negative impacts could include being removed from the locality of places of worship, caring responsibilities or homes that have been adapted to meet specific disability needs. These are addressed in the policy and the planning process it introduces.</p>
<p>What resource implications are there to deliver actions from this EIA? <i>(Quantify: people, time, budget, etc.)</i></p>

Training on this policy – Teams will need an understanding of their roles in delivering this policy correctly and working together to improve the customer experience when a short-term move becomes necessary. In particular, they will need to understand their responsibilities under the Equality Act 2010, housing legislation and the incoming Awaab’s law.

Financial implications - associated costs are already considered and paid but this policy formalises the approach and creates certainty for the resident. As a result we do not expect that costs will increase with any significance. There are also management controls in place to oversee, challenge and verify officer decisions for temporary moves to help limit demand and ensure that temporary moves are only agreed in exceptional circumstances.

The policy may increase the expectations and range of tasks on the Housing Management Team when short term accommodation is to be found. However, it is envisaged that these instances will be rare and that planning early for any disruption will reduce issues later.

4. Outcome following initial assessment

Does the activity have a <u>positive</u> impact on any of the protected groups, or contribute to promoting equality, equal opportunities and improving relations within target groups?	Yes
The policy ensures that specific requirements relating to protected characteristics are addressed.	
Does the activity have a <u>negative</u> impact on any of the protected groups, i.e. disadvantage them in any way?	No
Negative impacts could include being removed from the locality of places of worship. caring responsibilities or homes that have been adapted to meet specific disability needs. However, these are addressed and mitigated by this policy.	

5. Decision following the initial assessment

Continue with existing activity or introduce new / planned activity	Yes
Amend activity based on identified actions	No

Has the EIA identified any positive or negative impact on any of the protected groups which requires action? <i>e.g., adjustments to the approach or documents, changes to terminology, broadening parameters of policy, etc. If so, record any actions to be undertaken and monitored</i>			
Impact identified	Action required	Lead Officer	Deadline
Training required to ensure impacts are correctly understood and addressed.	Equalities training covering reasonable adjustments, the potential experience of those who share protected characteristics and responsibilities under the law to be completed by all staff included in this process. Many staff will already have had this training, so training needs will be identified where this is not the case.	Georgia Leigh	November 2025

6. Monitoring & Review

How do you propose to monitor and review the impact of your proposal? <i>Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are.</i>
This policy will be reviewed every three years or sooner if there are changes to legislation or regulation. We will monitor complaints about this process to assess the impact of this policy in addressing issues.

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Date of last review or Impact Assessment:	11/11/24
Date of next 12-month review:	11/11/25
Date of next 3-year Impact Assessment (from the date of this EIA):	11/11/27
Date Sent to HR and Organisational Development Team:	Click or tap to enter a date.

Stock Condition Policy EIA

1. Introduction

Division:	Crawley Homes
Name of activity:	Stock Condition Policy EIA
Type of activity:	A new policy or strategy
Completed by:	Robyn Comolli
Date completed:	12/11/24
Date approved by Head of Service	Click or tap to enter a date.

2. About the activity

Please note the term “activity” is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.

What is the main purpose of the activity?	
<i>Please explain in a short paragraph</i>	
Click or tap here to enter text. The stock condition survey programme policy aims to establish a framework for assessing the condition of our housing stock, ensuring the well-being and safety of our residents while optimising the efficiency of our maintenance investment strategies.	
Why is it being introduced / reviewed / changed?	
<i>This could be, for example because of new government legislation or guidance, changing services user needs, or financial reasons</i>	
The Social Housing Act 2023 introduced consumer standards which require registered providers must have an accurate, up to date and evidenced understanding of the condition of their homes that reliably informs their provision of good quality, well maintained and safe homes for tenants. This is good asset management practice to ensure the Council protects and invests in its assets.	
Who is the intended audience or target group?	
Internal audience or group:	Staff & Councillors
External audience or group:	Residents who use a particular service (please specify below)
If other, please specify below and provide details how the audience or target group will benefit?	

Crawley Homes Residents
Have you already consulted on / researched the activity? <i>Please provide a brief explanation of the work that has been undertaken and any key findings / data. Are there any gaps that need further investigation?</i>
A stock condition survey working group was created with the key stakeholders across the Landlord Service (Crawley Homes). This group included the Head of Service, Planned Maintenance Manager, Decarbonisation Manager, Area Surveyors, I.T Project Administrator, and the Disabled Adaptations Manager to use their experience and shape the policy. A Repairs, Maintenance and Stock Condition Workshop with over 20 residents and members of TLAP was held to discuss and decide on key factors of the policy. SMT and the Portfolio to comment on the final draft.

3. Assessing potential impact

When undertaking your assessment, it is important to think about every stage of the process regarding the activity. This includes the design phase, consultation, delivery phase and post completion of the activity. Information about the protected characteristic groups as defined by the Equality Act is available [here](#). You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

Impact on people with a protected characteristic	
Is there a potential positive or negative impact based on the following?	
Age (older / younger people, children)	Negative
Disability (people with physical / sensory impairment or mental disability)	Positive
Gender reassignment (the process of transitioning from one gender to another.)	Neutral
Marriage & civil partnership (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognised for same-sex couples)	Neutral
Pregnancy & maternity (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	Neutral

Race (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	Negative
Religion & belief (religious faith or other group with a recognised belief system)	Neutral
Sex (male / female)	Neutral
Sexual orientation (heterosexual, gay, lesbian, or bisexual,)	Neutral
Whilst Socio economic disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	Positive

<p>What evidence has been used to assess the likely impacts? <i>(e.g. demographic profiles, research reports, academic research, benchmarking reports, consultation activities, staff surveys, customer surveys, public surveys, complaints, grievances, disciplinary cases, employment tribunal cases, ombudsman cases, media reports)</i></p>
Benchmarking with similar projects such as SDHF and the Disabled adaptations EIA. Ombudsman cases - complaint outcomes.
<p>What resource implications are there to deliver actions from this EIA? <i>(Quantify: people, time, budget, etc.)</i></p>
<p>Staffing This forms part of the Crawley Homes Planned Works Growth Bid. Three surveyors to be appointed.</p> <p>Financial The cost of stock condition surveyors are already accounted for in budgets following a growth item in 2023/24 in line with report CH/203. However, in the process of developing our understanding of stock condition, capital investment may be required over the longer term to meet requirements of the Consumer Standards and decent homes standards (a revision to the latter is expected).</p>

4. Outcome following initial assessment

Does the activity have a <u>positive</u> impact on any of the protected groups, or contribute to promoting equality, equal opportunities and improving relations within target groups?	Yes
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<p>Socio-Economic – No evidence per se, but anecdotal. Disabilities – persons with disabilities or health needs will be prioritised.</p>	
<p>Does the activity have a <u>negative</u> impact on any of the protected groups, i.e. disadvantage them in any way?</p>	<p>Yes</p>
<p>There are legal implications arising from any non-access for stock condition surveys. It is vital that information is communicated in accordance with customer preferences and takes into account language or disability-related communication issues. See mitigation below.</p> <p>For various reasons, customers may have preferences for who is able to visit their home and at what time, for example if a religious practise prevents access at particular times of day, or a customer has experienced domestic abuse and prefers a particular member of staff to be present. This is reflected in the policy and in the no access arrangements.</p>	

5. Decision following the initial assessment

Continue with existing activity or introduce new / planned activity	Yes
Amend activity based on identified actions	No

<p>Has the EIA identified any positive or negative impact on any of the protected groups which requires action? <i>e.g., adjustments to the approach or documents, changes to terminology, broadening parameters of policy, etc. If so, record any actions to be undertaken and monitored</i></p>			
Impact identified	Action required	Lead Officer	Deadline
Letter type front being too small	Provide the information letter in a font size that is legible to the resident.	Robyn Comolli	

Visually impaired resident not able to read letter	Ensure that the existing mechanisms (such as braille) that have been identified in effective communication with resident are established.	Robyn Comolli	
English not as a first language - letter	Ensure the first language is identified and the letter translated effectively.	Robyn Comolli	
Resident not understanding the letter detailing the works	Ensure that the existing mechanisms (such as key worker) that have been identified in effective communication with resident are established.	Robyn Comolli	

6. Monitoring & Review

<p>How do you propose to monitor and review the impact of your proposal?</p> <p><i>Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are.</i></p> <p>This policy will be reviewed annually.</p>
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Date of last review or Impact Assessment:	12/11/24
Date of next 12-month review:	12/11/25
Date of next 3-year Impact Assessment (from the date of this EIA):	Click or tap to enter a date.
Date Sent to HR and Organisational Development Team:	Click or tap to enter a date.

CCTV Policy EIA

1. Introduction

Division:	Crawley Homes
Name of activity:	CCTV
Type of activity:	A new policy or strategy
Completed by:	Georgia Leigh
Date completed:	28/10/24
Date approved by Head of Service	Click or tap to enter a date.

2. About the activity

Please note the term “activity” is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.

What is the main purpose of the activity?
<i>Please explain in a short paragraph</i>
To clarify the use and operation of CCTV at premises managed by Crawley Homes
Why is it being introduced / reviewed / changed?
<i>This could be, for example because of new government legislation or guidance, changing services user needs, or financial reasons</i>
There is no previous policy and there is a need to ensure that all staff are operating within the law and GDPR.
There has been an increase in demand for and access to personal surveillance equipment, most notably smart doorbells and private CCTV systems.
Who is the intended audience or target group?

Internal audience or group:	Staff & Councillors
External audience or group:	Residents who use a particular service (please specify below)
If other, please specify below and provide details how the audience or target group will benefit?	
Crawley Homes Residents . The wider general public.	
Have you already consulted on / researched the activity? <i>Please provide a brief explanation of the work that has been undertaken and any key findings / data. Are there any gaps that need further investigation?</i>	
<p>This policy is based upon the guidance of the Information Commissioner’s Office (ICO) and Sussex Police. It incorporates the necessary codes of practise and privacy stipulations.</p> <p>The policy went out to online consultation in March 2024. Over 100 responses were made, and a feedback summary created from these. Feedback has been incorporated into the policy, and feedback not incorporated has been noted.</p> <p>Staff were also invited to feed back their views. Representatives of teams affected were consulted during March and April 2024.</p> <p>TLAP have scrutinised the policy and made recommendations. TLAP, SMT and Cabinet have commented on the final draft.</p>	

3. Assessing potential impact

When undertaking your assessment, it is important to think about every stage of the process regarding the activity. This includes the design phase, consultation, delivery phase and post completion of the activity. Information about the protected characteristic groups as defined by the Equality Act is available [here](#). You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

Impact on people with a protected characteristic	
Is there a potential positive or negative impact based on the following?	
Age (older / younger people, children)	Neutral
Disability (people with physical / sensory impairment or mental disability)	Positive
Gender reassignment (the process of transitioning from one gender to another.)	Positive
Marriage & civil partnership (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognised for same-sex couples)	Neutral
Pregnancy & maternity (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	Neutral
Race (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	Positive
Religion & belief (religious faith or other group with a recognised belief system)	Positive
Sex (male / female)	Positive
Sexual orientation (heterosexual, gay, lesbian, or bisexual,)	Positive
Whilst Socio economic disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	Neutral

What evidence has been used to assess the likely impacts?

<i>(e.g. demographic profiles, research reports, academic research, benchmarking reports, consultation activities, staff surveys, customer surveys, public surveys, complaints, grievances, disciplinary cases, employment tribunal cases, ombudsman cases, media reports)</i>
Staff and customer feedback. Analysis of complaints where CCTV has been unavailable or not provided in accordance with the ICO code. Analysis of ASB issues and case review when a hate incident has been alleged or reported.
What resource implications are there to deliver actions from this EIA? <i>(Quantify: people, time, budget, etc.)</i>
Training on this policy – all staff will need an understanding of their own authorities and limitations in order to deliver this policy correctly and improve customer experience, paying due regard to equalities issues.
There may be an uplift in requests for permission for personal monitoring equipment, which could temporarily increase time spent by surveyors to address.
No additional costs are anticipated as a direct result of this policy but over time we may make further investment in CCTV if there is a proven need for additional security measures at a particular scheme and/or designs for new build properties incorporate CCTV provision which as a result would bring more schemes within the remit of this policy

4. Outcome following initial assessment

Does the activity have a <u>positive</u> impact on any of the protected groups, or contribute to promoting equality, equal opportunities and improving relations within target groups?	Yes
The Policy enables a robust approach to the provision of CCTV evidence in the event of hate incidents.	
Does the activity have a <u>negative</u> impact on any of the protected groups, i.e. disadvantage them in any way?	No

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5. Decision following the initial assessment

Continue with existing activity or introduce new / planned activity	Yes
Amend activity based on identified actions	No

Has the EIA identified any positive or negative impact on any of the protected groups which requires action? <i>e.g., adjustments to the approach or documents, changes to terminology, broadening parameters of policy, etc. If so, record any actions to be undertaken and monitored</i>			
Impact identified	Action required	Lead Officer	Deadline
None			

6. Monitoring & Review

How do you propose to monitor and review the impact of your proposal?	
<i>Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are.</i>	
This policy will be reviewed every three years or sooner if there are changes to legislation or regulation.	

Date of last review or Impact Assessment:	11/11/24
Date of next 12-month review:	11/11/25
Date of next 3-year Impact Assessment (from the date of this EIA):	11/11/27
Date Sent to HR and Organisational Development Team:	Click or tap to enter a date.

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Agenda Item 8

Crawley Borough Council

Report to Overview and Scrutiny Commission

13 January 2025

Crawley Town Centre Update

Report of the Head of Economy and Planning, PES/476

1. Purpose

- 1.1 The purpose of the report is to provide members of the Commission with an update on Crawley Town Centre and its regeneration programme, particularly in light of the recent closure of the Marks & Spencer store on Queensway.

2. Recommendations

- 2.1 To the Overview and Scrutiny Commission:

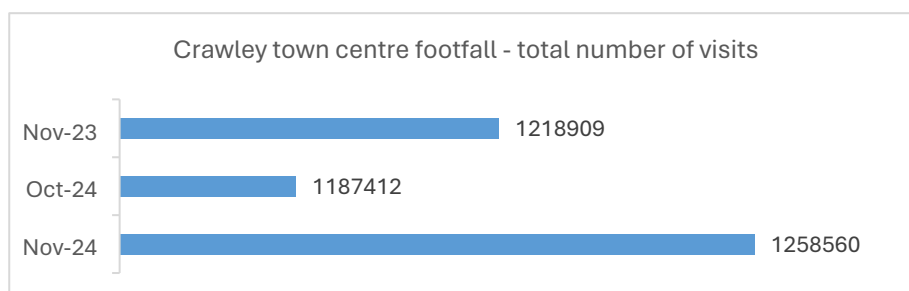
That the Commission is requested to receive this report, consider progress to date and acknowledge any future service actions.

3. Reasons for the Recommendation

- 3.1 Under the Scrutiny Procedure Rules, it was requested that a report be provided to the Overview and Scrutiny Commission with an update on Crawley Town Centre and its regeneration programme.

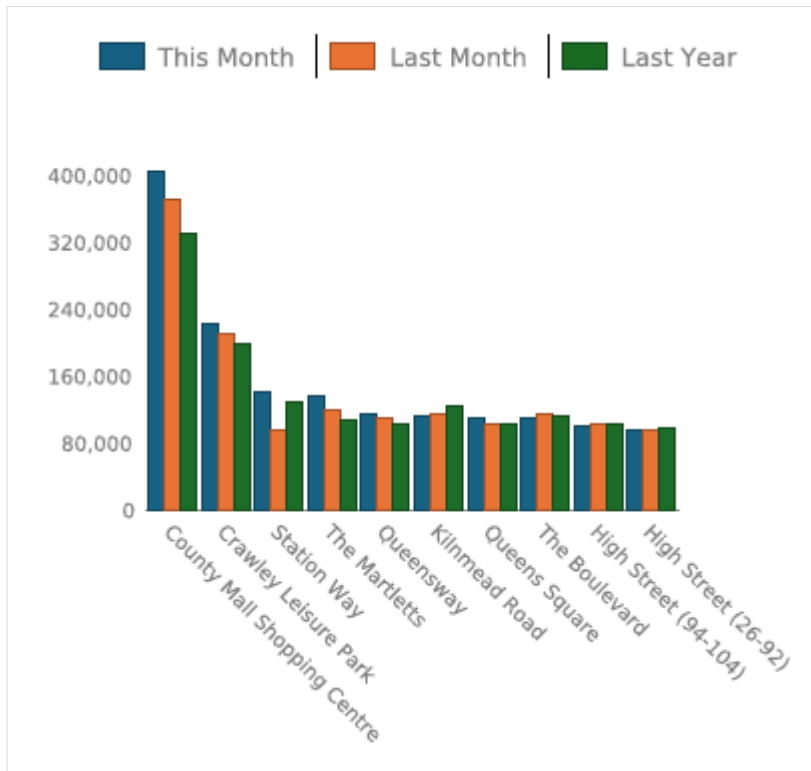
4. Background

- 4.1 Crawley town centre is one of three main employment areas within the borough and performs a number of important roles. It is leading sub-regional destination for retail and leisure, popular with Crawley residents and attracting visitors from a wider catchment area outside the borough. Home to more than 450 businesses, the town centre has a workforce of around 13,500 (14% of all the jobs in Crawley) across a range of sectors including retail and leisure, administrative and professional services including those offering legal, financial, recruitment, marketing and property services.
- 4.2 There is much to be positive about. Crawley Town Centre attracts more than 1.2 million visitors every month and figures are rising, year on year.

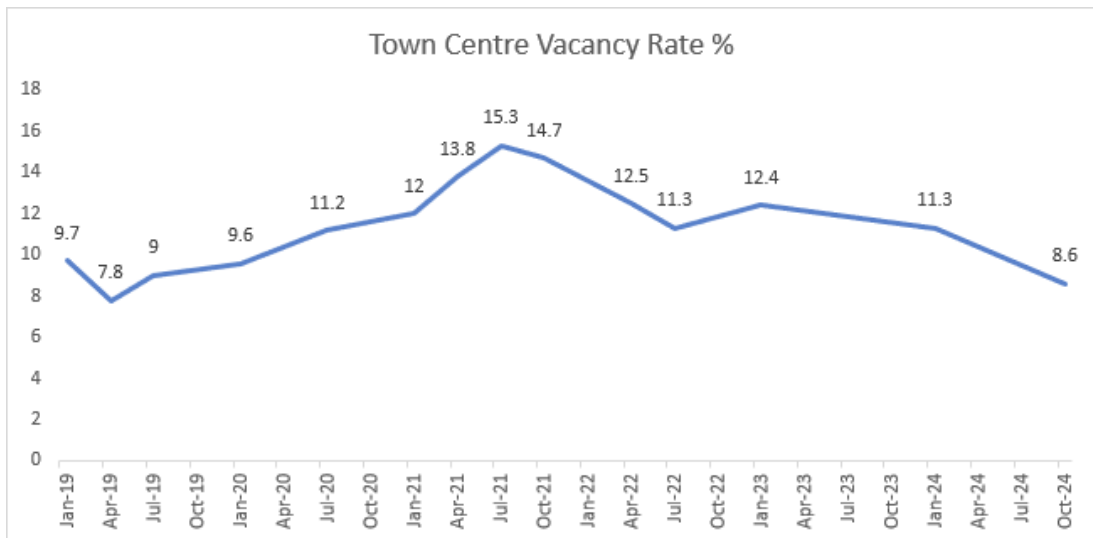


Agenda Item 8

The latest footfall data (November 2024) shows that County Mall is the busiest part of the town centre with just over 400,000 visitors.



4.3 The town centre has a low vacancy rate (8.6%) and around 100 independent retailers. This is notably below the national average (latest info: 13.8%). In recent months, there have been a number of new, niche retail and café openings that are changing the character of the town centre including Chaiwalla, Longdan Oriental Supermarket, Tesco Express, GymCrawley, Mooboo Bubble tea, Barakah Groceries, Something Wiccan and Elegans Boutique. These investments may not be as high profile as some of the more traditional brands but they are significant and mean that Crawley has something exciting and different as part of its town centre offer.



Agenda Item 8

- 4.4 It is also a sustainable place to live with a residential population that has risen to approximately 1,500 in recent years. Moving forward, significant new residential development is planned and it is recognised that the town centre is diversifying to become a neighbourhood in its own right.
- 4.5 On 16th November 2024, the Marks & Spencer store in Queensway closed its doors after 56 years of trading in Crawley town centre. The reason for the closure was based on a wider, strategic decision taken by Marks & Spencer on commercial viability grounds to move towards larger, more sub-regional stores with larger floor space. The building is also very old and costly to run. Marks & Spencer have expressed their desire to expand their presence in Crawley in the future, should a suitable site become available.
- 4.6 Council officers understand that the former Marks & Spencer store is expected to be sold in February 2025 and it is conceivable that the new owners may wish to bring forward proposals for residential and/or commercial space redevelopment on the site. Any proposals that are submitted will be formally considered by the Local Planning Authority in accordance with the recently adopted Local Plan for Crawley 2030-2040.
- 4.7 Whilst the closure of the Marks & Spencer store is hugely disappointing for the town centre, Crawley Borough Council remains committed to securing a vibrant neighbourhood and sustainable future for the town centre via significant qualitative investment.
- 4.8 'Town Centre Renewal' is a strategic priority in the Council's Economic Recovery Plan 2021-2037 – **see Appendix A Slide 2** - and is underpinned by a number of regeneration and investment programmes including:
- Town Centre Regeneration Programme
 - Crawley Growth Programme
 - Crawley Towns Fund Investment Programme
 - Employment and Skills Programme

The Council has been highly successful, working with West Sussex County Council and other stakeholders in unlocking over £120m of public funding investment since 2017 – **see Appendix A slide 3**. £60m worth of schemes have been completed, many benefiting Crawley Town Centre – **see Appendix A – slide 4**.

- 4.5 Moving into the exciting next phase of these town centre regeneration programmes in 2025, the Council is leading the delivery of two flagship interventions which are specifically focused on transforming the look and feel of the town's retail core, improving accessibility and connectivity and breathing new life into the town centre through new commercial, cultural and residential development.
- 4.6 The first intervention is **Station Gateway**; a major new town centre regeneration scheme that will see £7.4m investment in the physical transformation of the public spaces in The Martlets, Friary Way, Haslett Avenue West and at the junction between Station Way and Friary Way. This will boost pedestrian and cyclist connectivity between Crawley railway station, Crawley bus station and the rest of the town centre, improving access to the shopping environment to attract new retailers, leisure and commercial activities and visitors to the town centre. The scheme will also boost the capacity of the bus station at this important gateway to the town centre by revising the layout and

Agenda Item 8

creating a new central island on Friary Way for passengers to get on and off the buses. Subject to planning permission and the procurement of a construction contractor, we expect this exciting scheme to commence construction in 2025.

- 4.7 The second intervention will see the commissioning of a **new regeneration plan** for the east of the town centre, with a focus on showcasing commercial, retail and residential opportunities on six available sites in this part of the town centre. Those sites include the former Marks & Spencer building, the former Town Hall, County Buildings, the Queensway Store (Decathlon) and the northern parcel of land at Crawley College. Using Towns Fund money, the council will lead the development of a plan for the redevelopment of these sites, providing indicative concept layout plans and a portfolio of marketing materials to promote the sites to prospective investors. The Council will work closely with commercial agents, marketing experts, stakeholders and private landowners to champion, market and promote these sites through our inward investment programme 'Invest Crawley'.
- 4.8 Other projects include:
- the **Western Boulevard** Bus Service Improvement scheme, up to £2m of funding from the government, currently on site and due for completion in January 2025 – delivering improvements to the public realm and highways as an extension to the Eastern Gateway scheme, completed in 2022. The scheme will see new segregated cycle lanes, linking the High Street and The Boulevard and improve bus journey times, attracting greater visitor numbers to the town centre by bus and cycle.
 - the **Town Centre Cultural Quarter** project (paid for by the Towns Fund) – delivering a Pop-Up Culture programme since March 2023 and currently progressing a feasibility study and site delivery plans for a Cultural Hub in the town centre, delivering new jobs and business growth in the creative industries, reduced vacancy rates and an improved perception of Crawley.
 - Working in partnership with Crawley College to deliver a £14.5m state-of-the-art **Surrey and Sussex Institute of Technology** on the Crawley college campus, including a green construction skills hub, delivering high-quality learning environments for specialist construction, digital and engineering skills. This is being funded jointly by the Towns Fund (£4.5m) and the Department for Education (£10m).

The above are just a few of the programmes of regeneration schemes which are in the process of being delivered, worth £61.7 million of funding investment - **see Appendix A slide 5.**

- 4.9 Since the **Town Centre Business Improvement District** (BID) was formed in 2019 and launched in 2020, it has had a positive impact in the town centre and, supported by Crawley Borough Council, has delivered new services, events and initiatives that have helped to make the town centre safer, more engaging, better promoted with increased footfall and a place where businesses are better connected. Crawley Borough Council's Cabinet at its meeting on 6th November 2024, agreed to support the renewal of the BID for another five year term and in doing so, expressed support for the delivery of the BID's Business Plan, further demonstrating our commitment to working in partnership for the benefit of all town centre residents, businesses and visitors.

Agenda Item 8

- 4.10 The Town Centre BID has been particularly successful in improving the sense of community safety and security in the town centre with its Street Ambassadors working extremely effectively with retail store managers and the police and Council community safety services to combat theft, shop lifting and anti-social behaviour.

5. Research and supporting information

- 5.1 A recent report by the House of Lords Built Environment Committee '[High Streets: Life beyond retail?](#)' found that the dominance of retail on high streets is a thing of the past and local communities are increasingly seeking out restaurants, cafes, cultural and leisure activities in their town centres. Town centres are constantly evolving and it is important that local authorities, communities and businesses work together to shape places that reflect local demand and are adaptable and resilient.
- 5.2 The report also confirms that high streets will only thrive if people can get to them easily and safely and that people, particularly young people, value having spaces in which to socialise and spend time without necessarily spending money. They also value green spaces in or near to the high street so more green space and improved public realm should be a key consideration in proposed regeneration programmes.
- 5.3 The Council's regeneration programmes for the town centre are focused precisely on diversifying the town centre offer and boosting the quality of the visual appearance of the town centre, supported by planning policies that proactively support the role and function of the town centre with sufficient flexibility in place to enable it to respond positively to changes in circumstances.
- 5.4 The successful ongoing delivery of the Crawley Town Centre Regeneration programme, financed and greatly supported by the Crawley Towns Fund programme, the Crawley Growth Programme and the establishment of the Crawley Town Centre BID is boosted by the key successes in unlocking new residential (over 1,100 homes built) and commercial space development in the town centre. This provides clear evidence that the Council is doing all it can to secure a vibrant and sustainable future for the town centre.
- 5.5 The evidence is strong that Crawley's economy more widely is bouncing back strongly and is well into recovery mode as can be seen by the data set out in **Appendix A – slide 6**.

6. Background Papers

'One Town' Crawley Economic Recovery Plan 2022-2037 – report [PES/391](#) to Cabinet 24 November 2021

Town Centre Regeneration Programme (third edition) – report [PES/397](#) to Cabinet 16 March 2022

Crawley Town Centre Business Improvement District (BID) Renewal – report [PES/469](#) to Cabinet 6 November 2024

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APPENDIX A

Crawley Town Centre Update for OSC

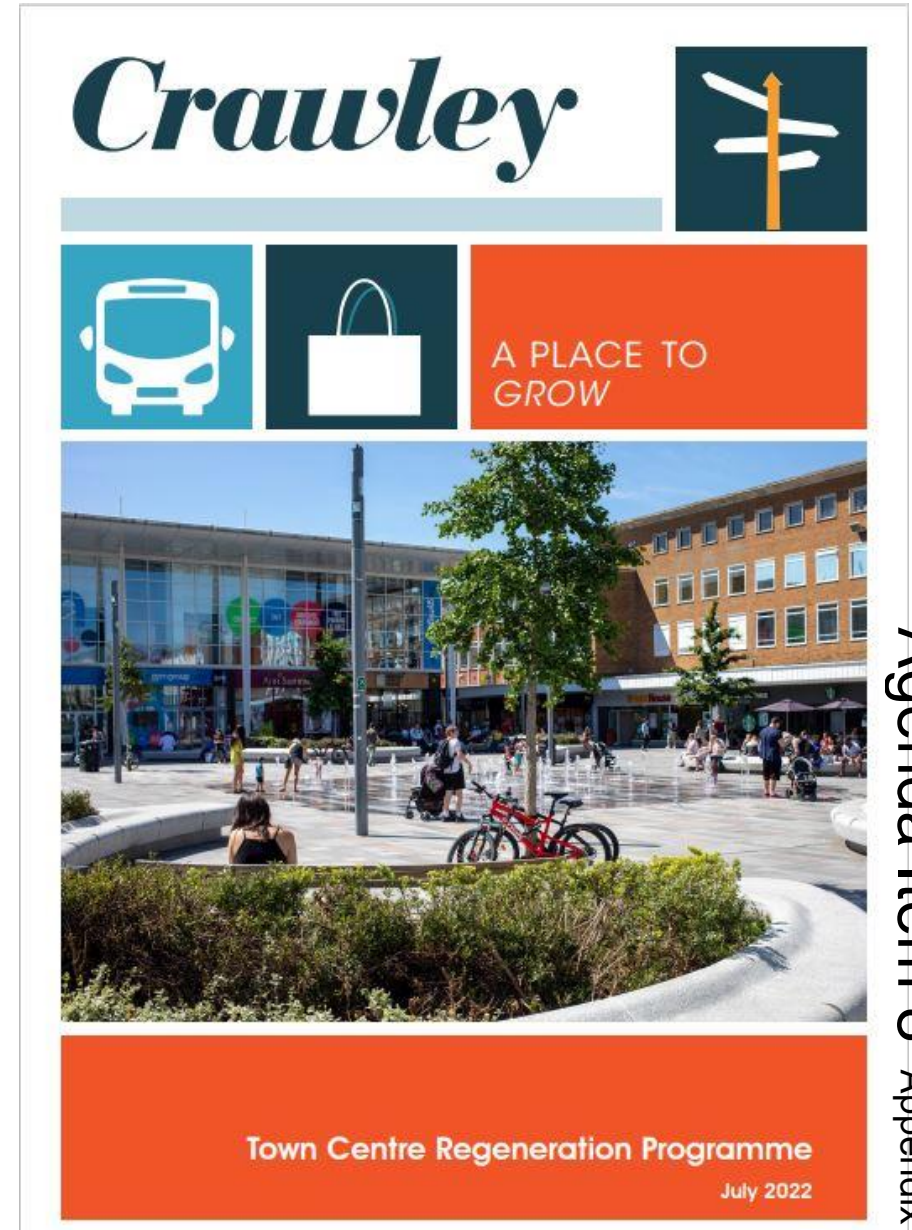
Supporting Information

December 2024 / January 2025



ECONOMIC RECOVERY PLAN 2022-2037 ADOPTED AND IN PLACE

- **A Diverse & Resilient Economy** I) Manor Royal Business Park; II) Crawley Innovation Centre; III) Unlock new employment land; IV) Town Centre Commercial Eastern Gateway; V) Invest Crawley – Inward Investment
- **Green Transformation** I) Green construction skills hub; II) Green Homes retrofit; III) Low carbon transportation; IV) Clean energy roll out; V) Extensive EV charge network
- **Town Centre Renewal – Town Centre Regen-** I) Station Gateway / Bus station; II) Eastern Gateway; III) Town Centre small business space; IV) Town Centre cultural quarter
- **Skills for the Future** I) Employ Crawley; II) Upgrade Crawley’s skills infrastructure; III) Higher level skills; IV) STEM Centre; Town Centre Construction Skills Academy
- **Connected Crawley** I) Transform bus station; II) Expand bus rapid transit; III) LCWIP roll out; IV) Maximise digital



SIGNIFICANT AMOUNT OF REGENERATION FUNDS UNLOCKED

Over £120m of public funding investment secured since 2017:

- Crawley Growth Programme - £75 million
- Crawley Towns Fund - £22.1 million
- Employment and Skills - £15.74 million
- Crawley Innovation Centre - £8.65 million

Skills Infrastructure - £15m

- Institute of Technology - £10m (DFE)
- STEM Skills Centre - £5m (Local Growth Fund)

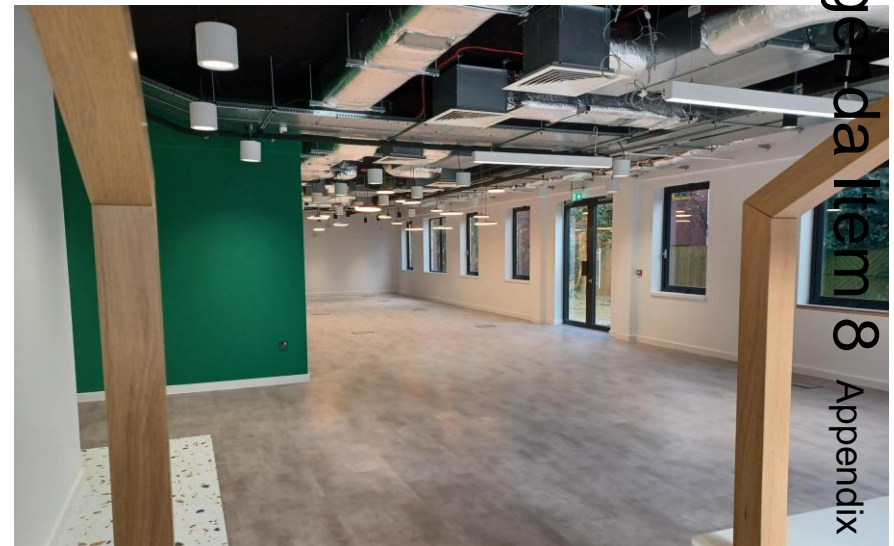
Employment and Skills / Employ Crawley - £740k

- “Journey to Work” – Business Rates Pool
- DWP – Discretionary Funds

Crawley Innovation Centre - £8.65m

- (Plus Towns Fund contribution - £5.05m)

Project Total: £13.7m



CRAWLEY GROWTH PROGRAMME – SCHEMES COMPLETED (£60 million)

CRAWLEY TOWN CENTRE

Queens Square - £3.2m

Real Time Passenger Info at bus shelters - £1.027m

Queensway / The Pavement - £2.2m

Town Centre Signage - £180,000

Worth Park Avenue Cycleway - £375,000

Eastern Gateway - £8.85m

Western Boulevard - £2m (near completion)

STEM Skills Centre - £5m

OTHER

Metrobus – Bus Fleet Investment (incl. hydrogen) - £13.7m

Network Rail – Crawley Rail Station Upgrades: £6m

Gatwick Airport – Local bus waiting areas / shelters / lifts: £2.8m

MANOR ROYAL

MR Outdoor Media - £820,000

MR “Gateway 1” improvements - £195,000

Churchill Court Small business space - £11m

Manor Royal Highways / JCT improvements - £2.13m



REGENERATION SCHEMES BEING DELIVERED – 2024 – 2027 (£61.7m)

CRAWLEY GROWTH PROGRAMME

1. Crawley Station Gateway / Bus Station - £7.4m (incl. £2m TF)
2. Town Centre Commercial space - £6m
3. Three Bridges station improvements - £5.1m
4. Manor Royal Bus Super Hub Waiting area: £300k
5. Manor Royal Bus Lane Extension: £1.3m
6. Arora Station plaza investments: £3.3m



CRAWLEY TOWNS FUND (TF)

1. Crawley Innovation Centre - £5.05m (+ £8.65m GBF)
2. Institute of Technology / Green Construction Hub - £4.5m (+ £10m DFE)
3. Green Tech business grants - £450,000
4. Green Business Infrastructure Solar Panels - £1m
5. Commercial Eastern Gateway assessment - £75k
6. Manor Royal Gigabit - £2m
7. Green Homes Retrofit - £4m
8. Manor Royal Business Environment – Micro Parks = £2.15m
9. Crawley Cultural Quarter - £450k



CRAWLEY – ECONOMY STATISTICS

- 27% growth in Crawley economy since 2022 - £6 billion PA GVA
- Nearly one quarter of West Sussex economy, 2% of land mass
- Claimant Count almost halved – over 8% to 4.5%.
- Nearly 83% employment rate – higher than SE (80%) and GB (76%)
- Over 10,000 more residents in a job year on year 2022-23 to 23-24
- 93,000 jobs, 17 square miles – ranked 15th in job density, 2nd in SE.
- Business volume 3,490 1.6% down since COVID (SE – 3.8%)
- 326 net new businesses in past year – highest net increase in West Sussex in 3 out of last 4 quarters.
- 7th most innovative pace 55.8 patents / 100,000 population)
- Productivity £39.30 GVA per hour worked versus £36.1 LA average

