

	Wellbeing & Safeguarding Policy
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1	Safeguarding Policy	P Latham	Feb 24	Board	Feb 24	Feb 24	Feb 27
1	Aids & Adaptations Policy	P Latham	Feb 24	Board	Feb 24	Feb 24	Feb 27
1	Hoarding Policy Statement	P Latham	Oct 24	Board	Oct 24	Oct 24	Oct 27
1	Mobility Equipment Policy Statement	P Latham	Oct 24	Board	Oct 24	Oct 24	Oct 27
1	Modern Slavery & Human Trafficking Policy Statement	P Latham	Apr 24	Board	Apr 24	Apr 24	Apr 27
1	Wellbeing & Safeguarding Policy	P Latham	Oct 24	Board	Oct 24	Oct 24	Feb 27

1. Introduction

This policy seeks to set out Eldonian Community Based Housing Association's (ECBHA's) policy positions regarding promoting and supporting the wellbeing and the safeguarding of vulnerable individuals.

This policy has brought together a number of separate policies into one document. Those previous documents and applicable content are superseded by this document.

2. Safeguarding Policy

2.1 Introduction

We aim to provide the highest possible standard of service to our customers and in doing so, we recognise that we must do all that we can to protect children and adults at risk from abuse when they are engaged in services organised or delivered by us.

We have working practices in place that help to us identify the signs of abuse and enable us to take action that is proportionate, focused on prevention and that offers protection for those most in need.

Our approach is governed by the principles as set out in the Care Act (2014) and focuses on our role as a partner delivering local solutions in so far as our role as housing provider allows.

2.2 Background & Context

ECBHA, owns or manages approximately 400 homes across the Vauxhall area of central Liverpool. Within our general needs homes are families with children of all ages and we recognise that there is a growing number of older adults. We also have housing specific bungalows and flats for people who are older and/or other vulnerabilities that may present an increased risk of abuse.

2.3 Scope

The implementation and scope of the policy applies across ECBHA locations activities and tenures.

2.4 Aims & Objectives

Through this policy ECBHA aims to establish its position towards:

- Identifying and respond appropriately to safeguarding concerns.
- Ensuring a high-level awareness of safeguarding responsibilities is maintained throughout ECBHA staff, contractors and volunteers who work with us.
- Promoting and implementing working practices to safeguard the wellbeing of children and adults at risk.
- Ensuring our approach supports the objectives of the Safeguarding objectives of the Local Authority

2.5 Legislation

The policy is in place to support:

- Legislative compliance, the:
 - Children Act 2004 (Sec 11)
 - Care Act 2014.
 - Working Together to Safeguard Children 2018
- Regulatory compliance, the:
 - Tenancy Standard
 - Neighbourhood and Community Standard

ECBHA is required to co-operate with and provide information to the Local Authority in relation to safeguarding of children and adults. This is legislated for in the Children Act 2004 (Sec 11) and the Care Act 2014.

These Acts set out arrangements that local authorities and their partners should have in place to reflect the importance of safeguarding and promote the welfare of children and adults. Whilst we do not have any direct statutory duties under these Acts, we have a key safeguarding role to play, alongside colleagues in Social Care, Health, and the Police, in keeping people safe.

2.6 Safeguarding Policy Statement & Position

Our role as a housing provider means that we are well placed to be proactive, identify people with care and support needs, recognise where there is risk of harm and share information and work in partnership to coordinate responses to keep people safe.

The Chief Operating Officer (COO) will be the designated safeguarding lead for the organisation.

Any employee or contractor who identifies potential harm or risk of harm to a customer can log a 'concern' within ECBHA and a Local Authority referral will be completed if required.

When we identify concerns regarding the welfare of children and adults at risk we will:

- Maintain strict confidentiality whilst dealing with cases where abuse occurs or is suspected.
- Make the safety and wellbeing of the person considered at risk our priority.
- Inform customers that some personal information may need to be shared even without the consent of the individual.
- Refer our concerns swiftly to the Local Authority through established referral arrangements outlined in the safeguarding procedures where the appropriate thresholds are met.
- Involve other agencies such as the police where this would be appropriate.
- Engage with key partners to facilitate effective responses to instances of abuse.

We will monitor the quantity and quality of referrals made to the local authority, keeping a confidential log of all cases.

We will monitor the progress and outcome of referrals with the local authority and, where appropriate challenge if we have professional concerns that adequate safeguarding is not occurring.

Due to its limited size, it would be disproportional for ECBHA to be a proactive member of local safeguarding Board's and partnerships, however it will be committed to acting on emerging best practice from such bodies.

ECBHA will engage in serious case reviews and multi-agency case reviews as requested by the Local Authority.

2.7 Definitions

Child – any person who has not attained the age of 18.

Adult at Risk – a person aged 18 years or over and at risk of abuse or neglect because of their need for care and support (Department of Health). An adult at risk may therefore be a person who, for example:

- is an older person who is frail due to ill health, physical disability or cognitive impairment • has a learning disability
- has a physical disability or sensory impairment
- has mental health needs including dementia or a personality disorder
- has a long-term illness or condition
- misuses substances or alcohol
- is a carer such as a family member or friend who provides personal assistance and care to adults and is subject to abuse
- lacks the mental capacity to make decisions and needs care and support.

Abuse – a violation of an individual's human and civil rights by any other person or persons (Department of Health)

- Abuse can take many forms and can include:
- Physical abuse
- Sexual abuse including child sexual exploitation
- Psychological and emotional abuse
- Financial abuse
- Neglect or acts of omissions
- Institutional abuse
- Discriminatory abuse
- Radicalisation of children and young people by political and religious extremists
- Domestic abuse
- Modern slavery

2.8 Responsibilities

All employees, agency workers, contractors are responsible for safeguarding. This includes sharing information and raising alerts where there is a concern. We will ensure the staff team is equipped to do by:

- Recruitment and induction arrangements that have regard to our approach to safeguarding.
- Ensuring all employees and contractors, are made aware of our Safeguarding Policy and how to report a concern.
- Having a clear training commitment.

- Identifying a Safeguarding Lead who can advise staff within the organisation.

Introductory level safeguarding training is mandatory for all staff. This will include:

- What is Safeguarding
- How to report a concern

The designated internal safeguard lead or leads will have additional training to ensure they are equipped to work with partners, including:

- How to complete a multi-agency referral
- Child protection conferences & reports, Case management.

For the avoidance of doubt, key duties are assigned as follows:

- Board – Approval and oversight of this policy implementation and being assured of its effectiveness.
- Chief Executive Officer - Responsible for overall implementation of the policy and reporting to Board.
- Chief Operating Officer – Will be the designated safeguarding lead for the organisation, assuming responsibility for ensuring that the policy continues to be appropriate and fit for purpose alongside:
 - Receiving reported concerns from ECBHA staff and contractors
 - Making referrals to the local authority
 - Monitoring the progress and outcome of referrals
 - Maintaining the confidential log of safeguarding cases and outcomes

2.9 Sharing Information and Confidentiality

We will have in place appropriate data sharing protocols with key safeguarding partners to enable sharing of information to safeguard customers, principally the local authority and the Police.

We will normally seek consent before sharing information but if this is not possible or refused, we will share information with other agencies if we believe it is in the best interests of the child or adult at risk.

There are also times when legally we must also share such information.

Our approach to safeguarding will be validated through the internal audit and assurance programme at least every three years, providing an independent assurance of the effectiveness of controls and processes.

This policy will be reviewed at least every three years or earlier if required due to a change in Government legislation or regulatory requirements.

2.10 Equality & Diversity

We acknowledge that some of our customers may face additional difficulties and may be more likely to experience some form of abuse. We work with our customers and partners to identify and respond effectively in circumstances where children and adults may be vulnerable or at risk.

2.11 Policy Breaches

Any tenant or staff member witnessing a breach of the policy must raise this directly with the person concerned or draw it to the attention of a member of the Leadership Team, ideally the Chief Operating Officer as the designated safeguarding lead.

Either whistleblowing and complaints arrangements can be used should a member of the public, resident, member of staff or contractor have concern with the organisations safeguarding practices.

2.12 Monitoring and Review

To ensure that the policy is effective and delivering the intended impact we will monitor the quantity, quality of referrals and referral outcomes. These will be reported to the Board biannually on an anonymised basis. Reporting will include the number of new, ongoing, and closed cases and any emerging organisational learning from cases.

2.13 Other relevant Policies & Documents

- Confidential safeguarding log
- Safeguarding procedure
- Local external safeguarding guidance

3. Aids & Adaptations Policy

3.1 Aim of the Policy

Adaptations are changes to a customers' home to help overcome practical problems when age or disability limits daily activities.

Adaptations may include specialist equipment, extra fittings or alterations that enable vulnerable customers' and their families to overcome difficulties in their home and make them more suitable to their needs.

ECBHA Ltd are committed to providing a flexible adaptations service to meet the needs of its customers for independence, privacy and dignity within their own homes.

We aim to offer a service that is fair, responsive and reasonable and helps our customers to continue to live independently and comfortably in their homes for as long as possible, with the minimum intrusion or intervention.

ECBHA Ltd will also take into account the need to utilise properties effectively, particularly those which are already adapted, and target resources to properties which can be reasonably adapted to provide an accessible home.

3.2 Aids & Adaptations Policy Statement

We aim to make all reasonable adjustments necessary to meet a vulnerable person's needs, where it is possible, practical and financially prudent/cost effective to do so.

We will only consider requests for major adaptations, including access ramps, that are supported by an Occupational Therapist Report.

As well as the person's needs, we will take in to account the property type, access, location, future adaptability, practicality and demand when assessing all major adaption requests.

Adaptions will be assessed on an individual case by case basis.

Baths in houses and upper floor flats should be retained wherever possible and appropriate shower facilities incorporated if required.

We will not provide any adaptations for mobility scooters.

We will not fund any form of mechanical lift or hoist installations, including stairlifts, step lifts or vertical lifts. Residents will be directed to Local Authorities for assistance and funding via Disabled Facilities Grant (DFG) applications.

We will not consider requests for vertical through floor lift installations without first seeking more suitable alternative accommodation and assessing the impact of the request on future letting of the property.

We will not carry out any adaptations if the property is under occupied by two or more bedrooms.

We will not unreasonably withhold permissions when customers ask to arrange and fund their own adaptations, however, proposals and details should be provided for approval and reinstatement conditions may apply to the resident to return the property to its original state.

We will not support funding for adaptations to properties managed by support agencies. Funding arrangements should be agreed in direct liaison between the support agency and the relevant local authority. ECBHA will not unreasonably withhold consent; however, proposals and details should be provided for approval and conditions may apply.

3.3 Monitoring, Delivery and Performance

A limited budget is allocated for carrying out adaption works each year, in addition grant applications will be made for Disabled Facilities Grants from the relevant local authority, wherever possible. This ensures that the maximum possible number of adaptations can be carried out. We will ensure our processes are cost effective and represent value for money in line with local authority partner grant conditions.

3.4 Funding

Annual limited budgets are provided for minor and major adaptations.

Minor adaptations are smaller non-technical items (or work) that are usually fixed to a property and designed to meet a specific need. For example, items such as over bath shower installations, grab rails, lever taps, flashing light doorbells, kick plates, level access thresholds etc would be regarded as minor adaptations. Generally, items in this category will cost less than £2k and will be funded from the minor adaptations budget.

Major adaptations are larger specialist works or equipment installation. These can be level access or easy access shower solutions, specialist baths and toilets, adapted kitchens, structural alterations, stairlifts, hoists etc. Generally, items in this category will cost in excess of £2k and will be funded mainly by Disabled Facilities Grants, typically supported with 20% contribution from our major adaptations budget, with the exception of mechanical lifts and hoists. ECBHA Ltd maximum contribution will not exceed £5k in each individual instance.

If a customer is required to pay a contribution as a result of a local authority DFG test of resources, ECBHA Ltd will not contribute towards the tenant's eligible costs.

We will also consider other resources which may be available from charitable sources or health partner agencies.

ECBHA Ltd will not provide funding where an offer of suitable alternative accommodation has been unreasonably refused by a customer.

3.5 Priorities

Adaption requests will be prioritised initially on assessment need and urgency and then in date order. Installation will be subject to enough financial resources being available to make a contribution at the Boards of approval.

Major adaptations will generally take priority from Disabled Grant Funding availability and confirmation from the relevant local authority.

3.6 Eligibility & Approval Conditions

The applicant must either be a tenant or a permanent member of a ECBHA Ltd household.

There must be a supporting assessment of need provided by an Occupational Therapist.

The applicant must have been an occupant in the household for at least 12 months to be considered.

It must be both practical and possible to create the requested environment at the property.

It must be financially prudent/cost effective to provide the adaptations recommended and the cost of the adaptations do not exceed 50% of the value of the property to be adapted.

The property must not have a potentially limited life such as those in designated clearance areas, or, is scheduled for major refurbishment.

The adaptation will not be likely to cause an obstruction or pose a potential risk.

There has been a Sustainable change in a person's condition or need, or a life limiting illness has been diagnosed since they first moved into the property.

The tenant does not have an active transfer application, Right to Acquire or Right to Buy application or is seeking a mutual exchange.

Prima Group is not seeking or considering seeking possession of the property for anB-social behaviour or rent arrears.

The tenant does not have debts to ECBHA Ltd greater than the value of 6 weeks gross rent and a repayment plan is in place at the time of application and being maintained at point of approval.

The tenant has agreed to pay any contribution that may be applicable after a Disabled Facilities Grant (DFG) test of financial means.

We reserve the right to refuse a major adaptation request if one or more of these conditions has not been met. If an applicant is dissatisfied with any aspect of our adaptations service this will be dealt with through ECBHA Ltd complaints policy.

3.7 Installation

ECBHA will work in partnership with the local authority to deliver adaptations to our customers.

Minor adaptations will be installed by ECBHA Ltd operatives or approved contractors at the discretion of the Chief Operating Officer. Major adaptations will be installed either by ECBHA Ltd approved contractor or a specialist contractor appointed by the local authority. This will be determined by the agreement in place with the relevant local authority.

In delivering any repairs or improvements in our properties, we will maintain the safety of our staff, contractors and customers as a priority and this may impact on how we plan and carry out the work. Depending on the circumstances, published timescales/response might need to be changed.

3.8 Rehousing

If a person has an adaptation need and we are unable to adapt their home as outlined in this policy, we will provide advice and assistance to help them find more suitable / appropriate accommodation.

Where a person is under occupying and needs to move, we will offer to adapt an alternative smaller property rather than their current home.

3.9 Replacements and Removals

We aim to leave in place non-recyclable major adaptations in our properties and utilise our adapted stock by matching them to an applicant's needs.

We will only consider removing a major adaptation if it is beyond repair, the property is no longer occupied by a person needing the item, the item is not practical for continued use, and where the future demand for the property would be limited with the adaptation remaining in position. This must not be less than five years from the date of installation, in line with Disabled Facilities Grant conditions, if applicable.

If a replacement component is required as part of our planned maintenance programme, or the existing adaptation is beyond repair, we will replace the adaptation on a like for like basis or consider alternatives which will better meet the tenant's needs with the relevant supporting documentation. This excludes mechanical lifts and hoists.

All information relating to adaptations will be held on the SDM management system.

3.10 Servicing and Service Charges

We will ensure that customers are aware of any potential future service charge prior to commencing the works. We will set this information out to the customer in writing and will require the customer to provide signed confirmation that they are aware of the future service charge and that the payment of service charges is a condition of the works being undertaken. Where required a variation to the existing tenancy agreement will be provided for the customer to sign prior to work starting on site.

On expiry of the guarantee period serviceable adaptations such as stair lifts, hoists, bath lifts, step lifts and vertical through floor lifts will be maintained and serviced by one of our approved contractors throughout the remaining life of the adaptation in line with our obligations under LOLER Regulations.

We will apply a service charge to reflect the annual maintenance costs we incur, which the customer has responsibility to pay.

The legal rights of ECBHA Ltd tenants are set out in their tenancy agreement and this policy does not create any additional legal rights.

3.11 Monitoring

We will monitor the service and measure our performance against our service standards.

4. Hoarding Policy

Hoarding is the persistent collecting of goods, objects or animals and being unable to discard of such possessions when the quantity has become excessive. Hoarding can vary from mild to severe cases whereby it may not impact a person's life at all or could seriously affect their functioning on a day to day basis.

Hoarding is a recognised mental health condition which can affect:

- The health and safety of our customers in their homes
- The ability and steps needed to be taken by ECBHA to ensure it meets its building safety compliance obligations
- The health and safety of their neighbours or adjacent properties
- The condition and value of the properties that ECBHA own and rent

All colleagues entering the homes of our customers, ECBHA properties (including contractors) should immediately report any hoarding related concerns to the Chief Operating Officer for investigation and follow up.

There are three types of Hoarding:

Inanimate Objects. This is the most common. This could consist of one type of object or a collection of a mixture of objects such as old clothes, newspapers, food, containers or papers.

Animal Hoarding. This is the obsessive collecting of animals, often with an inability to provide minimal standards of care. The hoarder is unable to recognise that the animals are or may be at risk because they feel they are saving them. In addition to an inability to care for the animals in the home, people who hoard animals are often unable to take care of themselves. As well, the homes of animal hoarders are often eventually destroyed by the accumulation of animal faeces and infestation by insects.

Data Hoarding. This is a new phenomenon of hoarding. There is little research on this matter and it may not seem as significant as inanimate and animal hoarding. However, people who hoard data could still present with same issues that are symptomatic of hoarding. Data hoarding could present with the storage of data collection equipment such as computers, electronic storage devices or paper. A need to store copies of emails, and other information in an electronic format.

We will aim to identify and support customers who display signs of excessive hoarding. We will differentiate between those who excessively hoard and those customers breaching the terms of their tenancy through neglect, waste or default of the property and act accordingly.

We will, once signs of hoarding have been identified, attempt to contact the customer and engage with them to resolve the issue, this may include (with the customers consent) seeking third party support from partner agencies. Where a safeguarding case is identified, we will attempt to visit the same day.

Where family or friends are already involved and impacted, and willing to co-operate, we encourage their assistance, however in doing this we will always comply with GDPR principles. Our priority is to engage with the customer personally, wherever possible.

We will attempt to identify any vulnerabilities or mental/physical disabilities the customer suffers from and, if relevant, will seek to manage the process with regard to those vulnerabilities/disabilities in a fair and transparent way.

We will consider the impact our requests could have on the customer's mental health and will ensure they understand our obligations as a landlord to protect and maintain their health and safety and our assets. Hoarding may adversely impact not only the hoarder's home

environment but beyond it too, with infestations and complaints from neighbours often necessitating a duty to investigate and support.

We will assess if a hoarding issue exists and will use the Clutter Image Rating Scale (CIRS) as a preliminary and objective assessment tool. CIRS is an image template showing a model room and the progressive degenerative impact of hoarding. Images from CIRS can be compared with the state and condition of the property for assessment purposes.

<https://hoardingdisordersuk.org/clutter-image-ratings/>

We will work in partnership with other agencies to ensure services are provided in a co-ordinated way and to develop appropriate strategies for working with and responding to the needs of those customers who hoard in order to address the issue.

We aim to refer customers we deem to be at risk of self-neglect and/or at serious risk of harm to the appropriate social services department for the purposes of assessment and support, if appropriate. The property and tenancy will also be flagged with colleagues in the Merseyside Fire and Rescue Service (MFRS) as a high risk property.

We acknowledge that each case is individual and as such, ECBHA will consider the most appropriate method of managing the case, considering a range of available options, and considering the severity and urgency of the situation. Options may include:

- An initial assessment of the property condition will be undertaken by a Housing Officer by attending the Property with the customer(s).
- Agree a plan with the customer to resolve their hoarding behaviours and start to clear the property of hoarded items.
- Where appropriate, referral onto another support provider.
- Sign posting to relevant organisations.

ECBHA acknowledges that forcing a customer who hoards to participate in large clearances, without their will, can often lead to the exacerbation of the individual's condition and have a long term negative impact on their mental health and well-being.

ECBHA recognises, however, that an individual's hoarding behaviours can have a significant negative impact on others living in the property, neighbours and the property itself and, therefore, tenancy enforcement may be necessary. This may include the use of:

- Civil Injunctions
- Possession Proceedings
- Liaising with environmental health for enforcement

It is our aim to support customers in addressing their hoarding behaviours and enforcement action should only be taken where:

- The customer's behaviour is so extreme as to cause significant harm to themselves or other persons.
- There has been continuous failed engagement with the customer and the customer's actions have been proven to have a detrimental effect on the property and/or others.

- Where access to the property for gas safety checks or other building safety compliance or repairs and improvements is required, and has been repeatedly refused, to ensure we meet our duties and obligations as a registered provider.

In the interest of public safety, the emergency services will be notified of cases where the clutter within the property presents an immediate risk to the welfare of others so that Fire Risk Assessments can be carried out.

5. Mobility Equipment Policy

ECBHA is committed to supporting the quality of life of its residents. In accordance with the Equality Act 2010 we support residents and leaseholders to make use of the most appropriate equipment available to enable them to live independently. This includes the lease or purchase of mobility scooters and powered wheelchairs.

ECBHA has a duty to ensure mobility scooters used by our residents are being used legally and safely, with appropriate responsibility being taken by the owner/user.

The obstruction from storing mobility scooters and electric wheelchairs and the potential fire risk from battery charging in fire escape corridors and stairway routes will mean permission will not be given for storing and charging in these areas.

This policy sets out how we will consider requests to store mobility scooters and the factors it will consider when granting or refusing storage permission.

This policy affects anyone with any class of mobility scooter and powered wheelchairs, especially people living in older peoples housing schemes with communal areas.

A mobility scooter is an electrically powered scooter designed for people with restricted mobility, typically those who are elderly or disabled. Powered scooters are defined as 'invalid carriages' under the Use of Invalid Carriages on Highways Regulations 1988.

The Policy covers

- Class 2 – Powered wheelchairs and scooters – intended for footway use only with a maximum speed of 4mph and an unloaded weight not exceeding 113.4kgs. These are not required to be registered with the DVLA.
- Class 3 – Powered wheelchairs and scooters with a maximum speed of 8mph generally intended for use on roads and highways. The unloaded weight must not exceed 150kgs. These are required to be registered with the DVLA

The use of powered mobility scooters and wheelchairs present many risks, not only to the building but to other residents, staff, and visitors. These include

- Collisions with other vehicles, lifts, building components and people - causing injury and damage
- Trip hazards from inappropriate storage and charging
- Fire risk caused by faulty mechanism
- Obstruction or restriction of safe fire escape routes or fire exits

ECBHA has a duty to comply with the law relating to fire safety. This ultimately takes priority over enabling the use of mobility scooters.

If a resident is considering obtaining a mobility scooter, they must seek permission in writing from ECBHA, to agree storage of the scooter. Whilst permission will not be unreasonably withheld, ECBHA take responsibility for the health and safety of all residents within a block of accommodation and this must be paramount.

Permission will only be granted if the resident is able to store the mobility scooter in suitable storage facilities; or within their home. This will be assessed and deemed if suitable by a representative of ECBHA. Costs relating to the storage, charging of the mobility scooter will also be considered and discussed with the resident. Consideration will also be given to additional costs such as cleaning floors/carpets/damage to walls and skirting boards and doors should they occur in the future.

The decision will be made after an assessment of the property and a risk assessment has been undertaken by ECBHA.

Residents will be expected to have an adequate level of relevant insurance in place before the scooter comes to ECBHA premises and to maintain that insurance at all times. Absence of adequate insurance cover may result in permission being refused or withdrawn.

Residents will be expected to ensure the mobility scooter is properly maintained, in accordance with the manufacturer's requirements. Failure to do this may result in the permission being withdrawn.

When considering whether permission should be granted, account will be taken of the potential impact on other people and permission will only be granted where the needs and wellbeing of other residents and other users of the building are not put at material risk.

Examples of where permission will be refused or withdrawn include:

- There is no safe storage in the resident home and no alternative safe storage and charging space can be provided
- A major physical alteration to the premises is required, which ECBHA believes to be unreasonable in terms of cost and/or disruption to other residents
- The scooter is deemed unsuitable by the housing team and health and safety team and following an inspection and assessment of the property
- If access to the property can only be gained via the use of the communal lift and there is no direct level access to the property
- The resident and/or family member wishes to keep more than one scooter

Examples of safe storage and charging spaces may include:

- A designated room within the property which provides fire protection to the residents and building in the event of a fire
- A designated external space

Permission may be withdrawn if the terms and conditions of the permission are not adhered to; if the resident purchases an additional or larger scooter without permission; or if new regulatory requirements dictate a change to this policy.

Where there are designated storage facilities for mobility scooters, spaces will be individually allocated on a 'personal need or a first come, first served' basis to existing residents.

Where there are no spaces available, a waiting list will be maintained. When a space becomes available, the resident at the top of the waiting list will be contacted to proceed with the application.

Mobility scooters must not be stored or charged in communal hallways, communal rooms or stairwells (unless designated storage and charging facilities have been provided) at any time; because they increase the risk of fire or obstruct a fire escape route.

If a mobility scooter is stored within a resident's property, they must ensure that there is enough space within the home to store the scooter safely. An inspection may be arranged to assess for additional fire safety requirements. The resident will bear any additional costs from these additional measures.

Residents or household member who use a mobility scooter store, may be required to pay an annual charge. The annual charge includes, but is not limited to, covering the costs of electricity, use of the mobility scooter store, administration, ongoing maintenance of the store and future improvements. ECBHA may alter the annual charge at any time by giving four weeks' notice in writing.

Mobility scooter users are to charge their mobility scooter (whether it is stored in a property or in a mobility scooter store) between 8am and 8pm to reduce the potential risk of fire overnight.

It is the responsibility of the scooter owner to ensure that an annual Portable Appliance Test (PAT) is carried out by a qualified electrician. If any charging equipment fails the PAT, it is the resident's responsibility to arrange the repair of it or replace it before using it.

If a mobility scooter is required to be driven within communal areas, this must be at no more than walking pace to avoid injury to others and damage to ECBHA property. Any damage must be reported immediately and any costs to repair the damage may be recharged to the scooter owner.

Lifts within ECBHA schemes are classed as "passenger lifts" and must not be used by mobility scooter users (ie with their mobility scooter).

Mobility scooter owners cannot store mobility scooters anywhere in ECBHA property or land without written consent.

ECBHA reserves the right to withdraw permission to store a mobility scooter at any time if any resident does not adhere to this policy. The resident will be asked to remove the mobility scooter immediately, and potentially, permanently.

6. Modern Slavery & Human Trafficking Policy Statement

6.1 Introduction

Thousands of people across the UK are being held in squalor and undertaking forced labour. Some may be fleeing war zones, others may have financial problems, but all find dream turns to

nightmare as their life descends into fear, debt and drudgery in exhausting, ill-paid, dangerous and degrading work, with escape impossible, forbidden or punished.

At ECBHA we're committed to an ethical approach to all our work, and expect our suppliers, partners and contractors to meet our standards. As a community-based housing association, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

This policy statement summarises the steps we are taking to minimise the risk of slavery or human trafficking in our business and our direct supply chains.

6.2 Policy Statement

We work with a range of contractors and suppliers. As a local housing provider with robust policies and a commitment to supporting local businesses, we do not consider any areas of our business to be at high risk of slavery or human trafficking. However, we still take this very seriously and will work with our contractors and suppliers to reduce this risk even further.

We have a range of approaches to minimise the risk of slavery and human trafficking in our operations:

- Whistleblowing policy: We encourage all our staff, tenants, and business partners to report any concerns about our activities or our supply chains. This includes risk of slavery or human trafficking.
- Contractor code of conduct: We are committed to ensuring our suppliers meet the requirements of the Modern Slavery Act 2015. We work with our suppliers to ensure that they meet the standards of the code. Serious violations of our code of conduct will lead to the termination of the contract.
- Temporary workers: We only use reputable employment agencies to source temporary staff, and we verify the practices of any new agency we intend to use.
- We undertake due diligence when taking on any new suppliers and regularly review our existing suppliers. We expect our suppliers to carry out their own due diligence of their suppliers/contractors.
- We will train all staff on modern slavery as part of our mandatory safeguarding training commitment.
- We will ensure that staff and residents are regularly made aware of how suspected modern slavery and human trafficking can be reported to the National Crime Agency via the Modern Slavery Helpline as part of the national referral mechanisms.

Modern Slavery & Exploitation Helpline - 08000 121 700

www.modernslaveryhelpline.org