

DECISION TAKER: Councillor Mark Reach, Cabinet Member for Good Homes

REPORT TITLE: NO ACCESS POLICY

17 JUNE 2026

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WARD(S): ALL

### PURPOSE

This paper supports the Council I priority Good Homes for all

The purpose of this paper is to outline the council's Landlord Services No Access Policy 2026-2029, the policy sets out a consistent and proportionate approach to managing situations where residents do not provide access for statutory compliance, repairs, building safety, tenancy management, welfare and safeguarding activities.

The policy supports the council's legal and regulatory obligations, including compliance with the Social Housing (Regulation) Act 2023, Building Safety Act 2022, Awaab's Law requirements, and the Regulator of Social Housing Consumer Standards.

### RECOMMENDATIONS:

1. To agree the Landlord Services **No Access Policy 2025–2028**.
2. That delegated authority be given to the Corporate Head of Housing to make minor operational, legislative or formatting amendments to the policy during the review period where these do not materially alter the policy intent.

## IMPLICATIONS:

### 1. COUNCIL PLAN OUTCOME

#### 1.1 **Greener Faster**

Effective access management supports planned maintenance, energy efficiency improvements, damp and mould prevention, and safe operation of building systems, contributing to sustainable housing management and healthier homes.

#### 1.2 **Thriving Places**

The policy supports safe, well-managed neighbourhoods by ensuring homes and communal areas remain compliant, maintained and safe for residents and surrounding communities.

#### 1.3 **Healthy Communities**

The policy prioritises resident safety, safeguarding and wellbeing through timely compliance checks, welfare visits, damp and mould inspections, and identification of vulnerabilities requiring support.

#### 1.4 **Good Homes for All**

The policy supports the council's landlord obligations to maintain safe, compliant and well-maintained homes through consistent management of no-access cases across housing services.

#### 1.5 **Efficient and Effective**

The policy establishes a consistent cross-service framework, clear escalation routes, improved audit trails and coordinated working between compliance, repairs and housing teams.

#### 1.6 **Listening and Learning**

Extensive staff consultation has informed the development of the policy to ensure the approach is operationally practical, consistent and aligned across Housing, Compliance, Repairs and Property Services. Effective and consistent management of no-access cases will help reduce financial exposure associated with compliance failures, disrepair claims, enforcement action, property damage, health and safety incidents, regulatory intervention and delayed statutory inspections or repairs. The policy also supports improved governance, auditability and proactive risk management across Landlord Services functions.

### 2 FINANCIAL IMPLICATIONS

2.1 Whilst there are no direct financial implications from the recommendations in this report, failure to manage no-access effectively could lead to increased

disrepair claims, regulatory enforcement, property damage, legal costs and health and safety liabilities.

- 3 LEGAL AND PROCUREMENT IMPLICATIONSThe policy supports compliance with statutory landlord duties including the Landlord and Tenant Act 1985, Gas Safety Regulations 1998, Building Safety Act 2022, Equality Act 2010 and Social Housing (Regulation) Act 2023. The policy also supports compliance with the Regulator of Social Housing Consumer Standards and Housing Ombudsman Complaint Handling Code. Procurement implications are limited to existing contractual arrangements with repairs and compliance contractors, who will be required to operate in accordance with the policy and associated procedures.

#### 4 CONSULTATION AND COMMUNICATION

- 4.1 Extensive staff consultation has been undertaken across Landlord Services, including Housing Services, Compliance, Repairs, Building Safety and relevant operational teams. Feedback from staff has informed the final policy and helped ensure the approach is practical, consistent and deliverable across services. Specific staff training has also been delivered with HQN to support understanding of no-access management, legal responsibilities, vulnerability considerations, escalation and good practice. The policy will be communicated to staff, contractors and residents, and published alongside a Plain English Summary.

#### 5 ENVIRONMENTAL CONSIDERATIONS

- 5.1 The policy has limited direct environmental impact. Indirect positive impacts include enabling access for damp and mould works, stock condition surveys, energy efficiency improvements and planned maintenance activities that support sustainable housing management and improved housing conditions.

#### 6 PUBLIC SECTOR EQUALITY DUTY (If none, state "None")

- 6.1 An Equality Impact Assessment (EqIA) has been completed. The policy includes provisions for reasonable adjustments, accessible communication methods and consideration of vulnerabilities to ensure services are delivered fairly, proportionately and in accordance with the Equality Act 2010.

#### 7 RISK MANAGEMENT

<b>Risk</b>	<b>Mitigation</b>	<b>Opportunities</b>
<b>Financial Exposure</b> - Failure to manage no-access effectively could lead to increased disrepair claims,	Clear escalation procedures, compliance monitoring, audit trails and coordinated cross-service working.	Improved compliance performance and reduced reactive costs.

regulatory enforcement, property damage, legal costs and health and safety liabilities.		
<b>Exposure to challenge</b> - Inconsistent application of no-access processes could result in legal challenge, Ombudsman findings or regulatory criticism.	Policy and procedure framework aligned to legislation, Consumer Standards and Complaint Handling Code.	Improved transparency, accountability and evidencing of decision-making.
<b>Innovation</b> - The policy supports improved digital case recording, coordinated service delivery and standardised escalation processes.	Clear operational procedures and staff guidance.	Improved data monitoring and service intelligence.
<b>Reputation</b> - Poor management of no-access could result in resident dissatisfaction, safety failures or adverse media and regulatory attention.	Resident-centred approach, clear communication, safeguarding considerations and complaint oversight.	Improved resident confidence and regulatory assurance.
<b>Achievement of outcome</b> - Failure to gain access may prevent completion of statutory inspections and repairs.	Structured escalation process, vulnerability support and legal remedies where necessary.	Improved compliance and service performance outcomes.
<b>Property</b> - Delayed access may increase risk of property deterioration, damp and mould, fire or compliance failures.	Early engagement, prioritisation of high-risk cases and emergency escalation powers.	Improved asset protection and housing safety.
<b>Community Support</b> - Residents may perceive enforcement action negatively if communication is unclear.	Clear communication, reasonable adjustments and support-led engagement.	Stronger resident understanding of landlord safety obligations.
<b>Timescales</b> - Delayed access could impact statutory compliance deadlines and repair timescales.	Defined escalation stages and monitoring arrangements.	Improved appointment management and performance monitoring.
<b>Project capacity</b> - Limited additional impact	Cross-service ownership and existing operational	Improved service coordination.

as implementation will be managed within existing service structures.	management arrangements.	
<b>Local Government Reorganisation</b> - The policy supports statutory landlord obligations that will remain applicable under any future local government arrangements.	Policy establishes consistent governance and operational processes transferable to future structures and in line with national best practices	Supports standardisation and future readiness across housing services.
Other - Safeguarding concerns may remain unidentified where repeated no-access occurs.	Joint working between Housing Officers, Tenancy Sustainment, Compliance and safeguarding services.	Earlier identification of vulnerability and support needs.

8 OTHER KEY ISSUES The policy supports improved information management, auditability and regulatory assurance across Landlord Services. Staff training requirements will be managed through existing compliance, safeguarding and housing management training programmes.

9 SUPPORTING INFORMATION:

9.1 The No Access Policy provides a consistent cross-service framework for managing situations where residents do not provide access for inspections, compliance checks, repairs, welfare visits and building safety activities. The policy establishes clear principles for engagement, vulnerability considerations, escalation and legal intervention where required. The policy has been developed in response to increased regulatory expectations following the Social Housing (Regulation) Act 2023, updated Consumer Standards and emerging requirements associated with Awaab's Law and building safety legislation. It aligns operational practice across Landlord Services and supports consistent, proportionate and evidence-based decision making.

10 OTHER OPTIONS CONSIDERED AND REJECTED

10.1 No formal alternative policy options were developed for decision, as the need for a consistent cross-service No Access Policy was identified through regulatory requirements, operational learning and staff consultation. Continuing with separate or informal service-level approaches was not considered appropriate, as this would increase the risk of inconsistent practice, weaker governance, reduced regulatory assurance and poorer resident outcomes.

## BACKGROUND DOCUMENTS:-

### Previous Cabinet/Committee Reports or Cabinet Member Decisions:-

This approach has previously been referenced within the Council's six compliance and building safety procedures. However, this document establishes a single, service-wide framework to ensure a consistent and coordinated approach is adopted and implemented across all Landlord Services functions.

### Other Background Documents:-

- Landlord Services No Access Policy 2025–2028
- No Access Procedure
- Social Housing (Regulation) Act 2023
- Regulator of Social Housing Consumer Standards (April 2024)
- Housing Ombudsman Complaint Handling Code

## APPENDICES:

Appendix 1 – Landlord Services No Access Policy 2025–2028 Draft

Appendix 2 – Equality Impact Assessment (EqIA) (Draft)

Appendix 3 – Resident consultation Summary

Appendix 4 – Plain English Summary (Draft)

Appendix 1 – Landlord Services No Access Policy 2025–2028

# Landlord Services No Access Policy 2025-2028

**Service Area:**

Landlord Services

**Policy Owner:**

Service Lead: Landlord Services

**Policy Category:**

**Regulatory** – Required to demonstrate compliance with landlord statutory duties, Regulator of Social Housing standards, and Housing Ombudsman requirements.

**Version controls:**

Version	Category	Trigger	Review Cycle	Author	Date
1.0.	Regulatory	New	3 years	Service Lead: Landlord Services	01 November 2025

If you require this policy in another format or language, please contact the Housing Service by emailing [policy@winchester.gov.uk](mailto:policy@winchester.gov.uk) or calling **01962 848 400**.

## **Purpose**

This cross-service No Access Policy sets out Winchester City Council's principles and approach where residents do not provide access for inspections, servicing, repairs, or safety-related visits. This Policy must be read in line with the No Access Procedure. The No Access Procedure sets out the mandatory operational steps, timescales and escalation routes.

Its aims are to:

- Ensure the Council meets legal and regulatory obligations to maintain safe homes under the Building Safety Act 2022.
- Ensure access for inspections and works required under Awaab's Law and associated timeframes.
- Provide a fair, consistent and transparent approach
- Minimise health, safety, and compliance risks linked to no-access
- Protect residents, staff, and contractors
- Support early identification of vulnerability or safeguarding concerns

The Council understands that this is a technical document and for transparency and accountability we will provide a 'Plain English Summary' to be published will be published on the Council's Housing webpages and made available on request.

## **Scope**

This overarching Landlord Services policy applies to all housing management, property compliance, repairs and maintenance activities requiring access. It covers:

- Homes managed under secure, introductory, non-secure tenancies
- Homes managed as Temporary Accommodation (including licence and non-secure tenancy agreements)
- Leasehold homes, where Winchester City Council retains responsibility, for communal systems or where Winchester City Council retains repairing or safety responsibility
- All Council staff, contractors and agents acting on behalf of Landlord Services

Activities include, but are not limited to:

- Gas servicing and safety checks
- Electrical safety inspections
- Fire safety inspections (communal and in-dwelling)
- Water hygiene, asbestos, damp and mould inspections
- Building safety case data collection and risk assessments.
- Stock condition surveys
- Emergency, urgent and routine repairs
- Compliance checks relating to the safety of buildings and homes
- Tenancy management inspections (including Temporary Accommodation/Housing Services)
- Any welfare or tenancy sustainment visits

## Roles and Responsibilities

<b>Role/Team</b>	<b>Responsibility</b>
<b>Housing Policy &amp; Projects</b>	Governance, review cycle, and inclusion in the Policy Register. Housing Policy does not manage cases or escalation decisions.
<b>Service Lead</b>	Policy Owner. Overarching decision-maker on decisions, scope and remit. Ensuring the policy is implemented, reviewed and complied with. Oversight, compliance, and review of this policy.
<b>Compliance Team</b>	Scheduling, monitoring and escalating statutory compliance checks; issuing no-access notices and Authority to trigger formal escalation in line with procedure.
<b>Repairs Service &amp; Contractors</b>	Attempt access, record outcomes, leave no-access cards, rebook appointments, escalate in line with procedure. Contractors must carry identification, clearly explain the purpose of the visit, and confirm the work to be undertaken. Where work is completed, contractors must explain outcomes, including when old items remain in place
<b>Housing Services – Housing Officers</b>	Engage residents where access issues relate to vulnerabilities, tenancy breaches, or safeguarding
<b>Tenancy Sustainment Officers</b>	Provide support to maintain access, address vulnerabilities, ensure residents understand their responsibilities
<b>Temporary Accommodation Officers</b>	Engage residents where access issues relate to vulnerabilities, tenancy breaches, or safeguarding applied within Temporary Accommodation settings
<b>Legal Services</b>	Advise and support legal action including injunctions and court applications
<b>Residents (Residents/leaseholders)</b>	Provide access as set out in tenancy, lease or licence conditions.

## Policy Statement

Winchester City Council is committed to ensuring that all residents live in safe, well-maintained homes and receive a consistent, fair and transparent service when access to their home is required. All actions taken under this policy will be proportionate to risk, statutory urgency and individual circumstances, including any identified vulnerabilities.

The Council has different types of landlord duties that require access to residents' homes. While timescales, urgency and legal requirements differ, the principles of engagement, support and escalation remain consistent and are set out in the No Access Procedure.

### **Emergency Access**

Emergency access is required where there is an immediate risk to life, health, safety or property, such as gas leaks, fire risk, serious flooding or structural failure.

These situations may require urgent attendance, including forced entry where legally authorised, to prevent harm and protect residents, neighbours and property.

#### **What this means for tenants**

- Emergency access may be required without prior notice
- The Council will act only where necessary and proportionate
- Every effort will be made to inform you as soon as possible and explain the action taken

### **Compliance and Building Safety Access**

Compliance and building safety duties include gas servicing, electrical safety inspections, fire safety checks, water hygiene, asbestos inspections and other safety-critical activities.

These are legal requirements, and the Council must complete them to comply with legislation and the Regulator of Social Housing's Home Standard. Failure to access a home for these checks may place residents at risk and expose the Council to regulatory or legal action.

#### **What this means for tenants**

- Receive advance notice of compliance appointments
- These visits are mandatory for safety reasons
- Repeated failure to provide access may lead to earlier escalation due to statutory risk

### **Repairs and Maintenance Access**

The Council has responsibilities under the Landlord and Tenant Act 1985 and tenancy agreements to keep homes in good repair.

Access is required to diagnose and complete both urgent and routine repairs, including those identified through inspections or stock condition surveys, to ensure homes remain safe, functional and compliant.

#### **What this means for tenants**

- Repairs appointments will be arranged in advance wherever possible
- Tenants will be told what the repair is and why access is needed
- Escalation will focus on risk to health, safety or property and will follow the same structured process as other access types

### **Housing Management and Welfare Access**

Housing Officers, Temporary Accommodation Officers and Tenancy Sustainment Officers may require access to carry out inspections, safeguarding visits, welfare checks and tenancy or neighbourhood management activities.

Access enables the Council to support residents, identify and respond to vulnerabilities, uphold tenancy conditions and protect communities.

### **Sheltered, Temporary and Scheme-based accommodation**

The Council recognises that residents living in sheltered, temporary and scheme-based accommodation may require a different approach to arranging access. Where appropriate, access arrangements may include face-to-face confirmation, coordination through scheme staff or wardens, or additional time and support to ensure residents clearly understand the purpose and timing of the visit.

These arrangements are intended to support residents, reduce missed appointments, and ensure access is managed in a safe, respectful and proportionate way.

### **What this means for tenants**

- Visits are intended to provide support as well as manage tenancies
- Vulnerabilities and individual circumstances will be considered
- Engagement and support will be prioritised before escalation

### **Consistent Approach and Escalation**

Despite differences in duty type, the Council applies a consistent, resident-centred approach to managing no-access across all services. All departments follow the same escalation stages as set out in the No Access Procedure, while recognising that urgency and timescales may differ depending on risk and statutory requirements.

Our approach is based on:

- Early engagement with residents as soon as access is needed
- Providing clear appointment information, including what work will be carried out and why access is needed
- Informing residents promptly if an appointment is cancelled and offering a new date within a reasonable timeframe.
- Clear, accessible and timely communication

- Support and reasonable adjustments for residents who may need additional help
- Close collaboration between compliance, repairs and housing teams, particularly where vulnerability or safeguarding concerns are identified
- Providing reassurance and safeguarding information so residents feel safe allowing access
- A consistent escalation framework applied fairly across services
- Legal action only as a last resort, with full consideration of individual circumstances

### **Vulnerability and Additional Support**

The Council recognises that some residents may experience circumstances that make it more difficult to provide access to their home. The Council is committed to identifying vulnerability early and providing appropriate support to ensure access arrangements are fair, reasonable and proportionate.

For the purposes of this policy, vulnerability is defined broadly and non-exhaustively and may include, but is not limited to:

- Disability or long-term health conditions
- Mental health conditions
- Age-related needs, including older residents
- Learning disabilities or cognitive impairment
- Sensory impairment
- Language or communication barriers
- Caring responsibilities
- Temporary crisis or personal circumstances affecting a resident's ability to engage

Vulnerabilities may be identified in a number of ways, including:

- Self-disclosure by the resident or their representative
- Information already held by the Council within the Housing Management System
- Observation or professional judgement by staff or contractors
- Information shared by partner agencies, support services or carers, where lawful and appropriate

Where a vulnerability is identified, the Council will consider and offer reasonable adjustments to support access, which may include:

- Providing longer or more flexible notice periods where legally possible
- Using different communication methods or formats, including plain English, large print or translation
- Allowing a carer advocate or support worker to be present
- Offering face-to-face engagement where appropriate
- Coordinating access through housing officers, scheme staff or support services

The Council will work collaboratively across services to ensure vulnerabilities are recorded appropriately, support is offered consistently, and residents are treated with dignity and respect throughout the access and escalation process.

### **Formal Action Where Access Is Repeatedly Refused**

Where repeated attempts to gain access are unsuccessful and access continues to be denied without reasonable cause:

- Compliance and building safety duties will be prioritised for urgent escalation due to statutory risk
- Repairs and housing-related access will follow the same structured escalation route, with prioritisation where there is risk to health, safety or property

If all reasonable efforts to engage and support the resident have been exhausted, the Council may take formal action, including injunctions, warrants or forced entry where legally authorised, to meet its legal obligations and protect residents, staff, neighbours and the wider community.

### **No Access Legal Powers**

Where access to a resident's home is required and has not been provided despite repeated attempts to engage, the Council may consider using legal powers to meet its statutory and safety obligations.

Before taking legal action, the Council will:

- Make reasonable attempts to contact the resident and agree access
- Provide clear information about why access is required and the risks of continued refusal
- Consider any vulnerabilities, support needs or reasonable adjustments
- Offer support and alternative arrangements where appropriate
- Follow the escalation stages set out in the No Access Procedure

Legal action is always a last resort and will only be pursued where it is necessary, proportionate and reasonable in the circumstances.

The Council may seek legal powers including injunctions under the Anti-social Behaviour, Crime and Policing Act 2014, warrants of entry under the Environmental Protection Act 1990, or powers under the County Court's general jurisdiction to enforce tenancy obligations.

Forced entry will only be used where legally authorised, typically through a court order or statutory warrant, and where necessary to prevent an immediate danger to life or property. Immediate danger includes gas leaks, fire risk, structural collapse or serious flooding.

Where vulnerabilities are identified, escalation and enforcement decisions will be reviewed and adjusted accordingly to ensure actions remain fair, proportionate and reasonable in the individual circumstances.

### **Cost Recovery and Charges**

Any consideration of recharging costs linked to missed appointments, legal action or forced entry will be case-specific and not automatic. The Council will take account of:

- The reason access was not provided
- Any identified vulnerabilities or support needs
- Whether reasonable adjustments or support were offered
- The resident's individual circumstances

Where charges are considered, residents will be informed in advance wherever possible and given information about how charges have been calculated and how they can raise concerns.

### **Recording and Monitoring**

All no-access attempts must be recorded in the relevant Landlord Services system (compliance module, repairs management system, or housing case system), creating a full audit trail. Records must be sufficient to evidence reasonableness, proportionality and learning and include:

- Appointment history
- Contact attempts (stating 1<sup>st</sup>, 2<sup>nd</sup> or 3<sup>rd</sup> Attempt)
- Letters and notices
- Photographs
- Notes from staff or contractors

Compliance performance will be monitored through:

- Quarterly Service Area performance reviews
- Housing Leadership Board reporting
- Resident Scrutiny reviews
- Learning from complaints and resident feedback

No-access trends inform TSM performance and improvement plans. Case audits will be used to identify learning and improve practice.

### **Resident Involvement**

This policy has been reviewed and will continue to be reviewed in consultation with Residents, in line with Winchester City Council's Resident Partnership and Influence Plan.

Feedback gathered through surveys contributed to this final version. A summary of consultation feedback and responses is available on request. Residents will be involved in future reviews and service improvements.

For further information on how to be involved please visit our webpage.

## **Complaints, Challenges and Review**

Residents have the right to raise concerns, challenge decisions or make a complaint at any stage of the no-access process. The Council encourages residents to do so before legal action is taken wherever possible, so concerns can be reviewed and resolved early.

Complaints will be handled in line with the Council's Housing Complaints Policy and the Housing Ombudsman Complaint Handling Code.

## **Winchester City Council Complaints Policy**

This section summarises. Complaints will be handled in line with Winchester City Council's Housing Complaints Policy and the Housing Ombudsman Complaint Handling Code, which set out a clear, fair, and accessible process for resolving complaints.

You can make a complaint in any of the following ways:

- By completing the online complaints form
- By email to: [customerservice@winchester.gov.uk](mailto:customerservice@winchester.gov.uk)
- By telephone: 01962 848 400
- In writing to: Winchester City Council, Colebrook Street, Winchester, SO23 9LJ
- By speaking directly to any council officer

**If you remain** dissatisfied after our response, you can escalate your complaint to the **Housing Ombudsman**, an independent service that reviews housing complaints across England. We aim to make the complaints process straightforward, fair, and transparent.

## **Information Management and Data Protection**

When you report a problem, we record it on our secure housing case system. We only collect and share information that is relevant, necessary, and proportionate. We follow the Data Protection Act 2018, UK GDPR, and the Council's Data Protection and Privacy Policy.

Sometimes we work with other agencies (for example, our contractors). We will only share your information with them if it is safe, legal and will help protect people or resolve the issue.

## **Equality, Diversity and Inclusion**

Everyone has the right to be treated fairly and feel safe in their home. The Council will consider individual circumstances and provide additional support where vulnerabilities or accessibility needs are identified.

The Council will make reasonable adjustments under the Equality Act 2010 and staff will apply trauma-informed principles when managing repeated no-access, particularly where repeated missed access may relate to disability, mental health, or other vulnerabilities.

An Equality Impact Assessment (EqIA) has been completed for this policy.

## **Legal and Regulatory Basis**

This policy is underpinned by the following:

### **Legislation**

- Landlord and Tenant Act 1985.
- Housing Act 1996.
- Gas Safety (Installation and Use) Regulations 1998.
- Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020.
- Defective Premises Act 1972.
- Protection from Eviction Act 1977
- Social Housing (Regulation) Act 2023 – Awaab’s Law provisions.
- Equality Act 2010
- Data Protection Act 2018 / UK GDPR
- Social Housing (Regulation) Act 2023.
- Regulatory Standards (Regulator of Social Housing, April 2024)

### **Regulation**

- Home Standard (April 2024)
- Neighbourhood and Community Standard (April 2024)
- Transparency, Influence and Accountability Standard (April 2024)
- Tenancy Standard (April 2024)
- Safety and Quality Standard (April 2024)
- Complaint Handling Code

### **Resident Satisfaction Measures (TSMs)**

- TSM Q03: Repairs completed right first time.
- TSM Q04: Timeliness of repairs.
- TSM Q05: Safety of home.
- TSM Q11: Landlord keeps residents informed.
- TSM CH03: ASB handling – no access affects welfare visits, safeguarding and neighbourhood management.

### **Related Documents**

- All 6 Compliance Policies and Procedures.
- Tenancy Agreement.
- Repairs & Maintenance Policy.
- Damp and Mould Policy.
- Complaints Policy.
- Safeguarding Policy (Adults & Children)

### **Policy Review Date**

We review this policy and our approach every three years, or sooner if the law or best practice changes. The Service Lead: Landlord Services has operational oversight. Monitoring is supported by the Building Safety Manager and Housing Services Manager. It is formally monitored through quarterly service performance reviews, including case audits, learning from complaints, and resident feedback.

All housing staff are trained on safeguarding, equality and legal powers, and they regularly update their training to keep residents safe.

## Appendix 2 – Equality Impact Assessment (EqIA)



## Winchester City Council

## Equality Impact Assessment (EqIA)

Section 1 - Data Checklist

When undertaking an EqIA for your policy or project, it is important that you take into consideration everything which is associated with the policy or project that is being assessed.

The checklist below is to help you sense check your policy or project before you move to Section 2.

		Yes/No	Please provide details
1	Have there been any complaints data related to the policy or project you are looking to implement?		
2	Have all officers who will be responsible for implementing the policy or project been consulted, and given the opportunity to raise concerns about the way the policy or function has or will be implemented?	Yes	Consultation was undertaken with all of housing Service - Compliance Teams, Repairs, Housing Officers, Tenancy Sustainment Officers, Temporary Accommodation Officers, Building Safety Manager, Legal Services, Corporate, Senior Management, Tenants.
3	Have previous consultations highlighted any concerns about the policy or project from an equality impact perspective?	Yes	Resident groups highlighted risks for disabled residents, older people, residents with anxiety or trauma, language barriers, and those requiring carers or advocates. These concerns directly shaped the policy's vulnerability, reasonable adjustment, and escalation safeguards.
4	Do you have any concerns regarding the implementation of this policy or project?	Yes	Managing access for vulnerable or disengaged residents presents challenges, particularly where statutory deadlines apply. There is a need for consistent staff training, high-quality record keeping, and clear cross-team working to prevent disproportionate impacts.

		Yes/No	Please provide details
	<i>(i.e. Have you completed a self-assessment and action plan for the implementation of your policy or project?)</i>		
5	Does any accessible data regarding the area which your work will address identify any areas of concern or potential problems which may impact on your policy or project?	Yes	National data shows higher no-access rates in households with known vulnerabilities, hoarding behaviours, mental health conditions, mobility impairments, or language barriers. Temporary Accommodation settings also show increased access challenges.
6	Do you have any past experience delivering similar policies or projects which may inform the implementation of your scheme from an equality impact point of view?	Yes	The Council past experience operational regarding access (gas safety, electrical safety, damp and mould, safeguarding). Lessons learned include the importance of early engagement, Housing Officer involvement, and avoiding enforcement without welfare checks.
7	Are there any other issues that you think will be relevant?	No	No additional issues identified at this stage.

## Section 2 - Your EqIA form

<b>Directorate:</b> Housing	<b>Your Service Area:</b> Landlord Services	<b>Team:</b> Landlord Services	<b>Officer responsible for this assessment:</b> Yvonne Anderson	<b>Date of assessment:</b> 01/01/2026
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	<b>Question</b>	<b>Please provide details</b>
1	What is the name of the policy or project that is being assessed?	Landlord Services No Access Policy (2025–2028)
2	Is this a new or existing policy?	New
3	Briefly describe the aim and purpose of this work.	To ensure Winchester City Council can lawfully, safely, and proportionately gain access to homes where required to meet statutory landlord, building safety, repairs, safeguarding, and welfare duties, while protecting residents' rights and promoting equality.
4	What are the associated objectives of this work?	<ul style="list-style-type: none"> <li>- Meet statutory safety and landlord obligations (including Awaab's Law).</li> <li>- Ensure consistent, fair, and transparent access management.</li> <li>- Protect residents, staff, and contractors.</li> <li>- Identify and support vulnerable residents early.</li> <li>- Prevent discrimination and disproportionate enforcement.</li> <li>- Improve communication, trust, and resident satisfaction.</li> </ul>
5	Who is intended to benefit from this work and in what way?	<ul style="list-style-type: none"> <li>- Council tenants and residents</li> <li>- Leaseholders (where landlord duties apply)</li> <li>- Vulnerable residents requiring additional support</li> <li>- Council staff and contractors</li> <li>- Wider community through safer homes</li> </ul>
6	What are the outcomes sought from this work?	<ul style="list-style-type: none"> <li>- Safe, compliant homes</li> <li>- Reduced risk of harm from missed safety checks</li> <li>- Fair and proportionate escalation</li> </ul>

		<ul style="list-style-type: none"> <li>- Improved equality outcomes and auditability</li> <li>- Compliance with RSH and Ombudsman standards</li> </ul>
7	What factors/forces could contribute or detract from the outcomes?	<ul style="list-style-type: none"> <li>- Resident engagement and willingness to allow access</li> <li>- Early identification of vulnerability or support needs</li> <li>- Clarity, tone, and accessibility of communication</li> <li>- Staff understanding and consistent application of the policy</li> <li>- Availability and flexibility of appointments and contractors</li> <li>- Statutory and regulatory deadlines limiting flexibility</li> <li>- Quality and accuracy of data and record-keeping</li> <li>- Safeguarding concerns requiring deviation from standard processes</li> <li>- Organisational capacity, workload, and staff turnover</li> </ul>
8	Who are the key individuals and organisations responsible for the implementation of this work?	<ul style="list-style-type: none"> <li>- Strategic Director (Housing) overall accountability</li> <li>- Service Lead: Landlord Services policy ownership and compliance</li> <li>- Building Safety Manager – statutory access and escalation oversight</li> <li>- Compliance teams (gas, electrical, fire, water hygiene, asbestos)</li> <li>- Repairs and Maintenance service</li> <li>- Housing Officers and Tenancy Sustainment Officers</li> <li>- Temporary Accommodation Officers</li> <li>- Legal Services</li> <li>- Corporate</li> <li>- Approved contractors</li> <li>- Tenant and Leaseholder Panels (consultation and scrutiny)</li> </ul>
9	Who implements the policy or project and who or what is responsible for it?	<p><b>Policy owner:</b> Service Lead: Landlord Services</p> <p><b>Operational implementation:</b></p> <ul style="list-style-type: none"> <li>- Compliance team</li> <li>- Repairs service</li> </ul>

		<ul style="list-style-type: none"> <li>- Housing Service</li> <li>- Tenancy Sustainment Officers</li> <li>- Temporary Accommodation Officers</li> </ul> <p><b>Day-to-day delivery:</b></p> <ul style="list-style-type: none"> <li>- Housing Officers</li> <li>- Compliance Officers</li> <li>- Repairs operatives</li> <li>- Contractors</li> </ul> <p><b>Enforcement decisions:</b></p> <ul style="list-style-type: none"> <li>- Compliance Managers</li> <li>- Area Housing Managers</li> <li>- Delegated senior officers</li> </ul> <p><b>Legal action:</b> Legal Services</p> <p>Oversight and assurance:</p> <ul style="list-style-type: none"> <li>- Building Safety Manager</li> <li>- DMT</li> </ul>
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		Please select your answer in <b>bold</b> . Please provide detail here.		
10a	Could the policy or project have the potential to affect individuals or communities on the basis of race differently in a negative way?	<b>Y</b>	<b>N</b>	
10b	What existing evidence (either presumed or otherwise) do you have for this?	Residents with limited English proficiency may not understand appointment notices, legal language, or escalation risks, increasing no-access risk.		

11a	Could the policy or project have the potential to affect individuals or communities on the basis of sex differently in a negative way?	Y	N	
11b	What existing evidence (either presumed or otherwise) do you have for this?	Some residents (particularly women living alone) may feel unsafe allowing access.		
12a	<p>Could the policy or project have the potential to affect individuals or communities on the basis of disability differently in a negative way?</p> <p><i>you may wish to consider:</i></p> <ul style="list-style-type: none"> <li>• <i>Physical access</i></li> <li>• <i>Format of information</i></li> <li>• <i>Time of interview or consultation event</i></li> <li>• <i>Personal assistance</i></li> <li>• <i>Interpreter</i></li> <li>• <i>Induction loop system</i></li> <li>• <i>Independent living equipment</i></li> <li>• <i>Content of interview</i></li> </ul>	Y	N	
12b	What existing evidence (either presumed or otherwise) do you have for this?	Physical, sensory, cognitive, and mental health impairments can affect communication, appointment management, and ability to provide access.		
13a	Could the policy or project have the potential to affect individuals or communities on the basis of sexual orientation differently in a negative way?	Y	N	
13b	What existing evidence (either presumed or otherwise) do you have for this?	No differential impact identified.		
14a	Could the policy or project have the potential to affect individuals on the basis of age differently in a negative way?	Y	N	

14b	What existing evidence (either presumed or otherwise) do you have for this?	Older residents, particularly in sheltered or scheme-based accommodation, may experience confusion, anxiety, or physical barriers to access.		
15a	Could the policy or project have the potential to affect individuals or communities on the basis of religious belief differently in a negative way?	Y	N	
15b	What existing evidence (either presumed or otherwise) do you have for this?	Religious practices may affect availability or comfort with access arrangements.		
16a	Could this policy or project have the potential to affect individuals on the basis of gender reassignment differently in a negative way?	Y	N	
16b	What existing evidence (either presumed or otherwise) do you have for this?	No evidence of differential impact.		
17a	Could this policy or project have the potential to affect individuals on the basis of marriage and civil partnership differently in a negative way?	Y	N	
17b	What existing evidence (either presumed or otherwise) do you have for this?	No differential impact identified.		
18a	Could this policy or project have the potential to affect individuals on the basis of pregnancy and maternity differently in a negative way?	Y	N	
18b	What existing evidence (either presumed or otherwise) do you have for this?	Pregnant residents and households with newborns may face heightened health risks or stress during access or works.		
19	Could any negative impacts that you identified in questions 10a to 15b create the potential for the policy to discriminate against certain groups on the basis of protected characteristics?	Y	N	Yes, if unmanaged

20	Can this negative impact be justified on the grounds of promoting equality of opportunity for certain groups on the basis of protected characteristics? Please provide your answer opposite against the relevant protected characteristic.	Y	N	<b>No</b> – all impacts must be mitigated.
21	How will you mitigate any potential discrimination that may be brought about by your policy or project that you have identified above?	<p><b>Accessible communication</b></p> <ul style="list-style-type: none"> <li>- Translate key documents into the most commonly used resident languages.</li> <li>- Provide access to interpreters and telephone translation services.</li> <li>- Ensure all digital and printed materials meet accessibility standards (e.g. plain English, large print, screen-reader compatible).</li> </ul> <p><b>Vulnerable resident protocol</b></p> <ul style="list-style-type: none"> <li>- Record vulnerability indicators and communication preferences (with consent).</li> <li>- Work jointly with Housing services, property services Neighbourhoods, Tenancy Sustainment, and Social Care to support access and resident welfare.</li> </ul> <p><b>Reasonable adjustments</b></p> <ul style="list-style-type: none"> <li>- Offer flexible appointment times and alternative access arrangements.</li> <li>- Provide temporary relocation or decant options where required for safety.</li> <li>- Deploy Tenancy Sustainment Officers to support residents with additional needs.</li> </ul> <p><b>Contractor and staff training</b></p>		

		<ul style="list-style-type: none"> <li>- Require Equality, Diversity and Inclusion (EDI), safeguarding, and vulnerable-resident awareness training for all staff and contractors.</li> <li>- Ensure contractors hold appropriate competency and accreditation.</li> </ul> <p><b>Resident engagement and feedback</b></p> <ul style="list-style-type: none"> <li>- Maintain an inclusive resident engagement strategy.</li> <li>- Use TACT and tenant panels to inform and co-design accessible communications where practicable.</li> </ul> <p><b>Monitoring and reporting</b></p> <ul style="list-style-type: none"> <li>- Monitor equality-related performance indicators.</li> <li>- Review equality data and mitigation actions on a quarterly basis.</li> </ul>		
22	Do any negative impacts that you have identified above impact on your service plan?	Y	N	<ul style="list-style-type: none"> <li>- Equality mitigation actions (accessible communication, vulnerable resident engagement, reasonable adjustments, and data integration) will be embedded within the Housing Service Plan.</li> <li>- Actions will align with compliance, building safety, and resident engagement priorities.</li> <li>- Progress will be monitored through existing performance, internal audits and governance arrangements.</li> </ul>

Signed by completing officer	Paul Salter
Signed by Service Lead	Yvonne Anderson
Corporate Head of Service	Karen Thorburn

## Appendix 3 – Resident consultation Summary

### **Landlord Services No Access Policy 2025-2028 Armchair Reviewer – Feedback Summary**

#### **Overall Feedback on Responses**

##### **What's Working Well**

- Core intent of the policy is understood by most respondents.
- Tenants broadly accept the need for access for safety and compliance.
- No respondents objected to the principle of enforcement only to how it's explained and applied.
- Positive feedback from older sheltered tenants suggests trust in the council, but also higher reliance on clear communication.

##### **What Isn't Working**

- The policy tries to do too much in one document.
- Key operational differences (compliance vs repairs) are not intuitive.
- The tone and structure are too internal and legalistic for a tenant-facing policy.
- Vulnerability is referenced but not operationalised

##### **Risk Signals**

Equality & accessibility risk (learning disabilities, mental health, older tenants).

Complaint escalation risk due to poor communication and missed/cancelled appointments.

Enforcement risk if tenants feel surprised, unsupported, or unclear on their rights.

Reputational risk if contractor behaviour is not clearly governed by the policy.

#### **Qualitative & Quantitative Analysis Table**

Quantitative Scores (Perceived Clarity, Understanding, Confidence)

Response ID	Policy Referenced	Clarity Score	Understanding Score	Confidence / Usefulness Score	Overall Sentiment
10	No Access Policy	5	5	5	Very positive
11	No Access Policy	4	4	4	Positive
13	Property Services No Access Policy 2025–2028	2	2	1	Poor
14	No Access Policy	4	3	3	Mixed / moderate

Key quantitative insight:

Average scores drop sharply where policy scope, language complexity, and process clarity are questioned.

Higher scores correlate with simpler expectations and familiarity, not necessarily policy robustness.

#### **Qualitative Feedback Themes**

Theme	Evidence from Responses	Impact
Access timing & practicality	Need for confirmation of access times; face-to-face engagement for sheltered tenants (ID 10)	Risk of missed appointments, frustration
Language & accessibility	Not user-friendly for tenants with limited education or learning disabilities (ID 13)	Accessibility & equality risk

Theme	Evidence from Responses	Impact
Policy scope confusion	Emergency vs compliance vs routine repairs unclear (IDs 13 & 14)	Misunderstanding of rights & obligations
Communication failures	Vague repair texts, lack of repair descriptions, cancelled visits not explained (ID 13)	Trust erosion, increased contact demand
Contractor conduct & ID	No clarity on identification, purpose of visit, or post-repair explanation (ID 13)	Safeguarding & reassurance risk
Enforcement transparency	Insufficient clarity on notice, costs, vulnerabilities, legal escalation (ID 14)	Anxiety, reputational and Ombudsman risk
Internal vs tenant-facing content	Legal lists and version control feel unnecessary (ID 14)	Information overload
Vulnerability handling	How vulnerabilities are identified, recorded, and supported unclear (IDs 13 & 14)	High regulatory risk under consumer standards

Suggested Actions (Clear, Achievable, Defensible)

### Structural Improvements

- Split or visually separate access types
- Emergency H&S access
- Compliance checks (gas, electric, fire, asbestos)
- Routine repairs & surveys
- Add a 1-page plain English summary
- Introduce a simple flowchart

Missed appointment → reminders → escalation → enforcement

### Communication Improvements

- Improve repair notification
- Include short description of repair in texts/emails
- Explain why access is needed
- Set expectations for cancellations
- Timeframe for notification
- Commitment to rebook within X days
- Remove or relocate internal content
- Move legal references to appendix or link
- Remove version control from tenant-facing version

### Contractor & Staff Standards

- Explicit contractor expectations
- Mandatory ID
- Clear explanation of purpose
- Post-repair explanation (especially when old items remain)
- Safeguarding reassurance
- What tenants should expect at the door
- What to do if unsure or uncomfortable

### Vulnerability & Enforcement Safeguards

- Define vulnerability clearly
- How it's identified
- How tenants can self-report

- Examples of support offered
- Clarify enforcement protections
- Minimum notice
- Cost recharge safeguards
- How vulnerabilities are considered before legal action
- Appeals and complaints routes

## Appendix 4 – Plain English Summary (Draft)

### **Tenant Summary – No Access Policy**

#### **Plain English Guide**

#### **Keeping Homes Safe – Why We Sometimes Need Access**

Winchester City Council sometimes needs access to your home to carry out important inspections, safety checks, repairs and support visits.

This may include:

- Gas servicing and safety checks
- Electrical inspections
- Fire safety inspections
- Damp and mould inspections
- Emergency or routine repairs
- Building safety inspections
- Welfare or tenancy support visits

These visits help us:

- Keep your home safe and well maintained
- Meet legal safety responsibilities
- Prevent risks to you, your household and neighbours
- Identify problems early before they become more serious
- Support residents who may need extra help

Some visits are required by law and cannot be missed, especially where health or safety could be affected.

#### **What You Can Expect From Us**

We will always aim to provide a fair, respectful and supportive service. We will:

- Give notice of appointments wherever possible
- Clearly explain why access is needed
- Tell you what work or inspection will take place
- Carry identification when visiting your home
- Treat you and your home with respect
- Consider your personal circumstances and any vulnerabilities
- Offer support if you are finding it difficult to arrange access
- Keep you informed if appointments need to change
- Work with you to rearrange missed appointments
- Try to resolve issues informally before taking further action

We understand that allowing access to your home can sometimes feel worrying or inconvenient, and we will always try to work with you in a reasonable and supportive way.

#### **If You Miss an Appointment or Do Not Provide Access**

If we cannot get access to your home:

- We will try to contact you again

- We may leave a calling card, letter, text message or voicemail
- We will normally offer another appointment
- Housing staff or support services may contact you if we think you need additional help
- We will keep a record of attempts to contact you and arrange access

For important safety inspections, such as gas, fire or electrical checks, we may need to escalate the case more quickly because of the legal and safety risks involved.

Repeated failure to provide access may lead to formal action, but this will only happen after reasonable attempts have been made to contact and support you.

### **Extra Support and Reasonable Adjustments**

We understand that some residents may find it difficult to arrange or keep appointments for many different reasons.

Please tell us if you:

- Need translation or interpretation support
- Have a disability or long-term health condition
- Have mental health or wellbeing needs
- Need information in large print or another format
- Need appointments at certain times
- Would like a carer, advocate or support worker present
- Are experiencing difficult personal circumstances

We will consider reasonable adjustments and work with you to make access arrangements as safe, fair and manageable as possible.

### **Emergency Situations**

In some situations, we may need urgent access to protect people, homes or buildings. This could include:

- Gas leaks
- Serious water leaks or flooding
- Fire risks
- Dangerous electrical faults
- Structural safety concerns
- Situations where there is an immediate risk to health or safety

In emergencies, access may sometimes be needed urgently and without advance notice where legally permitted.

Where necessary, the Council may use legal powers to gain access, but this is always treated as a last resort and only where reasonable and proportionate.

### **Your Rights**

You have the right to:

- Be treated fairly, respectfully and professionally

- Receive clear and accessible information
- Ask questions about visits or inspections
- Tell us about your circumstances or support needs
- Request reasonable adjustments
- Raise concerns or make a complaint
- Be informed before formal action is considered wherever possible

The Council will consider individual circumstances carefully before making decisions about escalation or legal action.