

Carlisle City Council

Report to:-	Housing Consultative Group			
Date of Meeting:-	3rd December 2001		Agenda Item No:-	
Public	Policy	Delegated: No		
Accompanying Comments and Statements		Required	Included	
Tenant Consultation:		Yes	Yes	
Environmental Impact Statement:		No	-	
Corporate Management Team Comments:		No	-	
City Treasurers Comments:		No	-	
City Solicitor & Secretary Comments:		No	-	
Head of Personnel Services Comments:		No	-	
Title:-	Communication Strategy			
Report of:-	Director of Housing			
Report reference:-	H109/01			

Summary:-

Presents a communication strategy and consultation plans which will guide the stock transfer consultation during the period to the ballot.

Recommendation:-

For the Health and Well-being Portfolio Holder to recommend approval.

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T Bramley

Director of Housing

21 November 2001

H109/01

Communication Strategy

1. Background

1. A draft communication strategy was presented to the Housing Consultative Group on the 1st October 2001 (H098/01). The strategy presented to-day takes account of all the comments and suggestions made on the draft and represents a jointly agreed approach to delivering a comprehensive programme of consultation in Carlisle in the coming months.
2. The Strategy formalises the arrangements for consultation, clarifies the roles and responsibilities of the City Council, the Riverside Group and the Independent Tenant Adviser (PEP). It will ensure the delivery of a clear focussed programme of consultation.
3. Since the draft strategy was presented, the DTLR has issued the Housing Transfer Guidance for the 2002 programme which now requires authorities to draw up a communications strategy.
Amendments made to the draft strategy have taken account of the guidance and reflect it's requirements.

2. What is in the Strategy

1. The attached strategy identifies aims and objectives – what we hope to achieve and how this will be achieved. It sets out our joint approach to involving tenant, leaseholders, staff, councillors and other stakeholders. The strategy details how tenants will be involved in the development of the proposal, through tenants' and resident groups, the TAG and CRTF and how the wider body of tenants will be kept informed and their views sought. It also looks at how the wider community, including leaseholders and freeholders in the areas affected will be kept informed.
2. Carlisle City Council and the Riverside Group have agreed consultation plans up to the transfer. These are attached as appendices to the communication strategy. At this stage some dates have not been inserted, but will be subject to discussion and alteration as the plan develops on a regular basis. Beverley Heaton for Riverside Group and Lesley Dixon for the Council will meet at least fortnightly throughout the consultation period to ensure that the plan is progressed.
3. An appendix to the communication strategy will also contain the work programme of the Independent Tenant Adviser, PEP. This has been agreed with tenants through the Tenant Advisory Group (TAG). Any changes will be discussed and agreed through the TAG.

3. Financial Implications

1. None directly from this report – the costs associated with the implementation of the strategy are already accounted for in existing budgets.

Access to Services Implications

2. Some of the key purposes of the strategy will be to ensure that communications emanating from the City Council, Riverside Group and PEP are timely, interesting, relevant and easily understood in order that the maximum number of recipients can consider they have had a meaningful opportunity to contribute.

4. Environmental Implications

1. None directly from this report. Indirectly the strategy will seek to ensure that all communications materials used are the product of accredited environmentally friendly production or recycling processes.

5. Recommendation

For the Health and Well-Being Portfolio to recommend approval.

T. Bramley

Director of Housing

CARLISLE CITY COUNCIL AND RIVERSIDE GROUP
PROPOSED LARGE SCALE VOLUNTARY TRANSFER
JOINT COMMUNICATIONS STRATEGY AND PROTOCOL

1 INTRODUCTION

1.1.1 Tenants and leaseholders have been fully involved in all aspects of Carlisle's consideration of transfer issues – from the options appraisal to landlord selection. It is Carlisle's intention that they should continue to be at the heart of the development of the transfer proposal. Carlisle's commitment to tenant involvement is set out in its Tenant Participation Compact, "Improving Housing Services". This strategy reflects these commitments and adopts good practice arising from the compact.

1.1.2 Staff consultation is also of high priority to both organisations. Staff have much to contribute to the development of the proposals and to the wider consultation process. Staff will all wish to understand the employment implications and opportunities of the transfer.

1.1.3 Both organisations also wish to ensure that other stakeholders gain a full and accurate picture of Carlisle City Council's and Riverside Group's aims and proposals, and can contribute their views as appropriate.

1.1.4 Carlisle City Council and the Riverside Group have agreed this joint communications strategy to help ensure that the tenant and staff consultation process, and wider communications:

- a) are of high quality, accessible and well planned and delivered;
- b) reflect the statutory basis of tenant consultation;
- c) reflect the statutory requirements for staff consultation;
- d) are value for money.

1.1.5 Both Carlisle City Council and the Riverside Group hope that the processes and plans contained within this communications strategy will ensure that tenants and leaseholders can make an informed decision and that there is a high tenant response in the ballot. The success of this strategy will be seen at ballot stage with a majority of tenants voting in the ballot.

1.1.6 This joint communications strategy outlines the roles and responsibilities of the respective partners in the transfer proposal, the aims and objectives of the strategy and the processes by which the strategy will be achieved. The strategy details how tenants will be involved in the development of the proposal, both through tenant and resident groups, the TAG and the CRTF and how the wider body of tenants will be kept informed and their views sought. It also looks at how the wider community, including leaseholders and freeholders in the areas affected will be kept informed.

2.0 AIMS AND OBJECTIVES

2.1 The aims of the communications strategy are:

- To ensure that all stakeholders, but particularly tenants and leaseholders, are involved in the development of and informed about the transfer proposals;
- To ensure that tenants can make an informed decision about transfer; and
- To meet the City Council's legal responsibilities, thus limiting the chance of successful legal challenge.

2.2 These aims will be achieved by:

- Involving tenants and leaseholder representatives in decision making about landlord/ tenant issues through the Tenant Advisory Group and the Housing Consultative Group;
- Involving tenant, leaseholder and resident representatives in decision making on community and estate issues through the Tenant Advisory Group and the Housing Consultative Group;
- Providing high quality, accessible, well planned and accurate information to tenants, leaseholders and other stakeholders through a variety of means. More details are contained within the consultation plan itself;
- Attending and arranging meetings and other community events to provide information on the transfer proposals.

3.0 ROLES AND RESPONSIBILITIES.

3.1 Carlisle City Council selected the Riverside Group as it's preferred partner for the stock transfer in Carlisle. Carlisle City Council and the Riverside Group each has a different part to play within the stock transfer process. In some areas, negotiation between Carlisle City Council and the Riverside Group will be necessary to ensure that the appropriate balance between the best interest of tenants, taxpayers and the two organisations are met. In most areas, co-operation and co-ordination will be the best way forward.

3.2 This section seeks to clarify the roles of each of the parties involved in the transfer in terms of the consultation process:-

- **Carlisle City Council** – It is Carlisle City Council's legal responsibility to consult all tenants whose homes are affected by the proposed transfer. Carlisle City Council is also committed to involving leaseholders in the process. There are three stages to the consultation:- informal, formal and the ballot. Each of these will be considered in more detail later in the strategy. In addition to this lead role in developing the consultation plan, the City Council will also wish to have an input to Carlisle Housing Association policy development discussions, inter group agreements, constitutional matters and legal status of Carlisle Housing Association.

Carlisle City Council will appoint a communications adviser to:

- 1) input to the communications strategy and consultation plan;
- 2) assist in providing a data base for recording and analysing tenants feedback;
- 3) staff training and briefing.
- **The Riverside Group** – Riverside will support the joint consultation plan through resources. All consultation material produced by Riverside is effectively on behalf of the Council and will need the approval of the Director of Housing. Riverside will lead on the door to door consultation exercise, through the staff engaged to do this will be briefed by the Council's Communications Advisers.
- **Carlisle Housing Association Shadowboard** - Effectively the Riverside Group will be developing policies and proposals on behalf of the Shadowboard of Carlisle Housing Association. Carlisle Housing Association will need to be aware of the content of this strategy.
- **PEP (Independent Tenant Adviser)** – Carlisle City Council appointed PEP to assist tenant and leaseholder representatives and to provide information to all tenants on the options appraisal and landlord selection. Tenants and leaseholders were involved in drawing up the brief for PEP's work and in their appointment. In addition the Tenant Advisory Group oversee their work programme. PEP's brief and work programme is detailed within a separate document, but it is included within Appendix Two of this strategy.

The role of PEP is to provide tenants and leaseholders with a source of independent, factual and objective advice. In addition where necessary PEP will act as a negotiator on behalf of tenants and leaseholders, representing their views at formal meetings and ensuring that their views are fairly represented and their interests are upheld. There will be occasions within the process where PEP will need to meet with tenants and leaseholders separately from both Carlisle city Council and the Riverside Group. Both these parties recognise and support this need.

The consultation plan in section 3 will include the timing and subject matter of material which the ITA intends to issue and any meetings they intend to have with tenants.

The protocol for approving written material (section 5.2) will apply to any material produced for circulation to all tenants and leaseholders, which is concerned with the transfer rather than general promotional activity. However it is not the intention of either Carlisle City Council or the Riverside Group to veto any information which PEP wishes to issue to tenants and leaseholders.

- **Staff** - The role of staff in the transfer process is central. Consultation with staff and trade unions on employment issues is covered by separate protocols to be agreed. Statutory employment rights must be fully respected.

It is critical that staff of both Carlisle City Council and the Riverside Group be kept fully informed of the development of the transfer proposals as they affect tenants and homeowners. Tenants will turn to staff for advice, and staff will play an important role in the pre-statutory and statutory consultation processes.

Regular briefings and training for both Carlisle City Council and Riverside Group staff, particularly those in regular contact with tenants, will therefore be held. Feedback from staff, on the proposals and on issues raised by tenants and homeowners will be welcomed.

During Stage 1 statutory consultation, a programme of door-knocking, with the aim of reaching all tenants, will be undertaken. It is essential that all staff undertaking this are properly briefed as it is part of the statutory process. This exercise will need to be planned, agreed and resourced well in advance and any briefing will involve Carlisle City Council and be provided by the Communications Advisers.

- **Councillors** – it will be the responsibility of Carlisle City Council officers to keep councillors properly informed. Carlisle City Council and the Riverside Group will co-operate to provide joint briefings. It will be the responsibility of Riverside Group to keep its management committee and the shadow board of Carlisle Housing Association properly informed. Carlisle City Council and Riverside Group will co-operate to provide joint briefings.

4.0 MISINFORMATION

4.1 Carlisle City Council and Riverside will brief their respective staff to be alert for inaccurate or misleading material being circulated to tenants, homeowners or others. Any such material will be passed as quickly as possible to Lesley Dixon at Carlisle City Council and depute at the Riverside Group who will confer on the appropriate response. In these circumstances, an extremely quick response is usually essential. Staff will be asked to identify if possible the source and the extent of circulation.

4.2 Any such material will be logged in case (for example) it needs to be included with any submissions to the Department of Transport, Local Government and the Regions.

4.3 Responses to misinformation may include the following:

- a) No action – for example, if the material is felt to have had limited circulation and/or is of poor quality and unlikely to make an impact.
- b) Briefing tenant representatives, councillors, Carlisle Housing Association shadow board members or staff – this may be especially appropriate where misinformation has been oral rather than written (e.g. statements at a public meeting).
- c) Contact with the press to clarify items published or to correct inaccurate information.

- d) A special newsletter or fact sheet where a major issue has been misrepresented widely.
- e) Legal action – in the case of slander, libel or interference with the statutory process.

4.4 Advice from the respective legal advisers will be sought as necessary.

5.0 PROCESSES

5.1 This section looks at the practical arrangements for ensuring that the broad commitments of the strategy will be met.

5.2 Consultation Material

5.2.1 A small working group (Lesley Dixon, Beverley Heaton, Chris Simpson and a City Council tenant) will produce all consultation material. Once drafted it will be circulated to key agencies and the TAG in line with the timescales below.

5.2.2 This group will provide a draft for comment directly to:

- a) Wright Hassall (legal advisers to Carlisle City Council), specifically Phillip Heath.
- b) Trowers & Hamlins (legal advisers to Riverside Housing Group), specifically James Hawkins.
- c) The Community Housing Task Force, specifically Paul Schofield;
- d) The DTLR, specifically Katy Crossthwaite.

[Paul Schofield will respond on behalf of both the CHTF and the DTLR.]

5.2.3 The consultation team will specify a deadline for comments which should not be less than 48 hours (excluding non-working days). Recipients may ask for an extension of time but this should be exceptional if the material concerned forms part of the programme (see 2.2.3) once agreed. We need to allow at least 5 working days for the comments of the DTLR and the CHTF as per the guidance. The consultation team to ensure that once the draft has been received will chase non-replies.

5.2.4 Revised draft should be issued as soon as possible to those listed in 5.2.2.

5.2.5 The guidance and advice of Carlisle City Council's Communications Unit will be sought to ensure that consultation material complies with the Disability Discrimination Act 1995 and is written in plain English. Lesley Dixon will do this within the timescales.

5.2.6 Tony Bramley will sign off all written material on behalf of Carlisle City Council. Final drafts will be sent to all those listed above before it is issued to tenants.

5.2.7 No written material, referring to the transfer will be circulated to public forums until the partners have had the chance to comment on its content. Any literature which is being sent to tenants and leaseholders such as 'Housing Link' will be copied to Riverside.

5.3 The communication plan

5.3.1 The purpose of a communications strategy within a stock transfer is to set a clear framework for:

- a) identifying the audiences to whom information needs to be communicated and whose views need to be taken into account;
- b) developing the messages that need to be communicated and any issues that need to be consulted upon;
- c) developing the most effective ways of communicating with tenants, staff and other audiences;
- d) ensuring that, within an inevitably dynamic and high profile initiative, accurate and timely information is issued and misinformation is countered;
- e) obtaining and recording information on the concerns and questions raised by tenants, staff and other stakeholders, ensuring that this information is analysed and used, and that issues are responded to adequately;
- g) meeting the Council's legal responsibilities, thus minimising the chance of successful legal challenge.

5.3.2 Carlisle City Council and the Riverside Group have agreed a consultation plan up to transfer. This is attached as Appendix One of the Strategy. At this stage some dates have not been inserted but will be subject to discussion and alteration as the plan develops.

Carlisle City Council's own consultation programme is more limited due to the extent of Riverside's programme. Regular discussion between Riverside and the City Council will ensure that:

- consultation is thorough and not duplicated;
- the chances of legitimate legal challenge are minimised;
- tenants and others are not confused and overloaded with information; and
- consultation budgets are appropriately spent.

5.3.3 Appendix Two contains the proposed work programme for the Independent Tenant Adviser, PEP. This programme of work has been agreed with tenants through the Tenant Advisory Group. Any changes will be discussed and agreed through the TAG.

5.4 Meetings with tenants and leaseholders

- 5.4.1 This strategy acknowledges that there will be aspects of communication which are general promotional work by the Riverside Group and communications with tenants/leaseholders from Carlisle City Council which are on matters other than transfer. These fall outside the scope of this strategy.
- 5.4.2 But any meetings or discussions with Carlisle City Council tenants or staff, which look at the transfer proposals, should only be undertaken with Carlisle City Council's approval. These may be established Tenant and Resident Group meetings, specially convened public meetings or meetings with individual tenants in their own homes.
- 5.4.3 Both Carlisle City Council and Riverside Group need to know when these meetings and discussions are taking place. All meetings which fall into this category need to be detailed in the consultation plans, attached. Discussion between Carlisle City Council and Riverside is necessary to ensure that appropriate staff are present and that the ITA is available to attend if necessary.
- 5.4.4 All meetings and discussions will be logged and all queries/comments/questions and follow-up action recorded. This maybe required as part of the submission to the Secretary of State. Carlisle City Council will look at the appointment of an adviser to assist with this data capture.