

# Cabinet Agenda

**Date:** Thursday 16 March 2023

**Time:** 6.30 pm

**Venue:** Auditorium - Harrow Council Hub, Forward Drive, Harrow, HA3 8NT

## Membership:

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**Chair:** Councillor Paul Osborn (Leader of the Council and Portfolio Holder for Strategy)

### Portfolio Holders:

Councillor Marilyn Ashton

Councillor David Ashton

Councillor Stephen Greek

Councillor Hitesh Karia

Councillor Jean Lammiman

Councillor Mina Parmar

Councillor Anjana Patel

Councillor Pritesh Patel

Councillor Norman Stevenson

### Portfolio:

Deputy Leader of the Council and Portfolio Holder for Planning & Regeneration

Finance & Human Resources

Performance, Communications & Customer Experience

Children's Services

Community & Culture

Housing

Environment & Community Safety

Adult Services & Public Health

Business, Employment & Property

### Non-Executive Members:

### Role:

Councillor Thaya Idaikkadar

Councillor Kanti Rabadia

John Higgins

Non-Executive Cabinet Member

Non-Executive Cabinet Member

Non-Executive Voluntary Sector Representative

### Quorum 3 (including the Leader and/or Deputy Leader)

**Contact:** Nikoleta Kemp, Senior Democratic & Electoral Services Officer

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# Useful Information

## Joining the Meeting virtually

The meeting is open to the public and can be viewed online at [London Borough of Harrow webcasts](#)

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### Directions by car:

Go along Kenmore Avenue and head towards the Kenton Recreation Ground. When approaching the end of the Kenmore Avenue turn right before reaching the Kadwa Patidar Centre.

The venue is accessible to people with special needs. If you have specific requirements, please contact the officer listed on the front page of this agenda.

You will be admitted on a first-come-first basis and directed to seats.

Please:

- (1) Stay seated.
- (2) Access the meeting agenda online at [Browse meetings - Cabinet](#)
- (3) Put mobile devices on silent.
- (4) Follow instructions of the Security Officers.
- (5) Advise Security on your arrival if you are a registered speaker.

## Filming / recording

This meeting may be recorded or filmed, and if you choose to attend, you will be deemed to have consented to this. Any recording may be published on the Council website.

**Agenda publication date: Wednesday 8 March 2023**

## **Agenda - Part I**

### **1. Apologies for Absence**

To receive apologies for absence (if any).

### **2. Declarations of Interest**

To receive declarations of disclosable pecuniary or non-pecuniary interests, arising from business to be transacted at this meeting, from all Members present.

### **3. Petitions**

To receive any petitions submitted by members of the public or Councillors.

### **4. Public Questions**

To note any public questions received.

Questions will be asked in the order in which they were received. There will be a time limit of 15 minutes for the asking and answering of public questions.

**[The deadline for receipt of public questions is 3.00 pm, 13 March 2023. Questions should be sent to [publicquestions@harrow.gov.uk](mailto:publicquestions@harrow.gov.uk)**

**No person may submit more than one question].**

### **5. Councillor Questions**

To receive any Councillor questions.

Questions will be asked in the order agreed with the relevant Group Leader by the deadline for submission and there be a time limit of 15 minutes.

**[The deadline for receipt of Councillor questions is 3.00 pm, 13 March 2023].**

### **6. Progress on Scrutiny Projects (Pages 7 - 8)**

For consideration

## **Place**

### **KEY 7. UK Shared Prosperity Fund - Harrow's Direct Allocation Proposed Spend (Pages 9 - 46)**

Report of the Corporate Director of Place and the Director of Inclusive Economy, Leisure & Culture.

### **KEY 8. Home Improvement Agency - Extension of existing contract and procurement of Aids & Adaptations and Handy person service (Pages**

47 - 56)

Report of the Corporate Director of Place and the Director of Housing.

**KEY 9. Review of the Social Housing Allocation Scheme (Pages 57 - 178)**

Report of the Corporate Director of Place and Director of Housing.

## **Resources and Commercial**

**KEY 10. Authority to Implement and administer Extra Support Schemes for Residents in 2023/24 (Pages 179 - 186)**

Report of the Director of Finance.

**KEY 11. Cabinet and Member Engagement in the Commissioning and Procurement Programme (Pages 187 - 246)**

Report of the Director of Finance.

**12. Any Other Urgent Business**

Which cannot otherwise be dealt with.

**13. Exclusion of the Press and Public**

To resolve that the press and public be excluded from the meeting for the following item of business for the reasons stated.

Agenda Item No	Title	Description of Exempt Information
14	Home Improvement Agency - Extension of existing contract and procurement of Aids & Adaptations and Handy person service – Appendices 1,2,3,4 and 5	Information under paragraph 3 of Part I of Schedule 12A to the Local Government Act 1972, relating to the financial or business affairs of any particular person (including the authority holding that information).

## **Agenda - Part II**

**14. Home Improvement Agency - Extension of existing contract and procurement of Aids & Adaptations and Handy person service (Pages 247 - 322)**

Appendices 1,2,3,4 and 5 to the report of the Corporate Director of Place and the Director of Housing.

### **Data Protection Act Notice**

The Council will record the meeting and will place the recording on the

Council's website.

**[Note:** The questions and answers will not be reproduced in the minutes.]

Deadline for questions	3.00 pm on 13 March 2023
Publication of decisions	17 March 2023
Deadline for Call in	5.00 pm on 24 March 2023
Decisions implemented if not Called in	25 March 2023

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**PROGRESS ON SCRUTINY PROJECTS**

Review	Methodology	Type of report	Expected date for report to Cabinet	Comments
<p><b>North West London Joint Overview &amp; Scrutiny Committee (JHOSC)</b></p>	<p>Joint Committee</p>	<p>Update reports provided to Health &amp; Social Care sub committee (for information)</p>	<p>As required</p>	<p>The North West London (NWL) JHOSC will meet next on 8 March 2023, hosted by Ealing Council. The meeting will consider the Elective Orthopaedic Centre Consultation and Proposal, NWL ICS update, Inpatient Mental Health Bed Capacity across NWL, NWL JHOSC recommendations and information requests tracker, and NWL JHOSC work programme.</p> <p>There are regular update reports on the JHOSC to Harrow’s Health and Social Care Scrutiny Sub-Committee so that there is a formal feedback loop between regional and local health scrutiny. Councillor Chetna Halai, Chair of the Health and Social Care Scrutiny Sub Committee, is Harrow’s member on the JHOSC.</p>
<p><b>Customer Experience</b></p>	<p>Review</p>	<p>Report to Cabinet</p>	<p>TBC</p>	<p>The first review group meeting took place in January where the scope was finalised. The scope was presented at the Overview and Scrutiny Committee (O&amp;S) in February and approved. Work with the scrutiny review group is now underway and the review aims to report back to O&amp;S in June 2023.</p>

<b>Childhood Immunisations</b>	Review	Report to Health & Social Care sub committee	TBC	The Review Group met on 7 February for a briefing on the key issues and progress on the action plan. This was also attended by Health leaders. Headlines were presented to Health & Social Care Sub-committee on 21 February. Comments from Members will feed into the detailed work for the review and it was agreed that a full report is to be brought back to the Health and Social Care sub at a later date, which is to be confirmed.
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**Contact:** Nahreen Matlib, Senior Policy Officer

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**Report for: Cabinet**

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<b>Date of Meeting:</b>	16 <sup>th</sup> March 2023
<b>Subject:</b>	UK Shared Prosperity Fund – Harrow’s Direct Allocation Proposed Spend
<b>Key Decision:</b>	Yes - relates to more than £500,000 and covers more than two wards
<b>Responsible Officer:</b>	Dipti Patel - Corporate Director of Place; Mark Billington - Director of Inclusive Economy, Leisure & Culture
<b>Portfolio Holder:</b>	Cllr Norman Stevenson – Portfolio Holder for Business, Employment & Property Cllr Jean Lammiman - Portfolio Holder Community and Culture Cllr Anjana Patel - Portfolio Holder for Environment and Community Safety Cllr David Ashton - Portfolio Holder Finance and Human Resources
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All wards
<b>Enclosures:</b>	Appendix A – Equalities Impact Assessment (EqIA): UK Shared Prosperity Fund – Harrow’s Direct Allocation Proposed Spend

## **Section 1 – Summary and Recommendations**

This report sets out the financial and legal implications of the Council entering into an agreement with the GLA regarding the Council's direct allocation of the UK Shared Prosperity Fund (UKSPF).

### **Recommendations:**

Cabinet is requested to:

- 1) Agree to enter into a Grant Agreement with the GLA and secure £1.4m direct funding from the Department of Levelling Up's UK Shared Prosperity Fund (UKSPF) and deliver projects to improve Harrow as a place, and to support residents and businesses.
- 2) Delegate authority to the Corporate Director following consultation with the Portfolio Holder for Business, Employment & Property, Portfolio Holder for Community and Culture, Portfolio Holder for Environment and Community Safety and Portfolio Holder for Finance and Human Resources to sign the agreement.

### **Reason: (for recommendations)**

As the Lead Authority to manage UKSPF in London, the GLA requires each London Borough to sign a funding agreement to receive the Borough's direct allocation of UKSPF funding.

## **Section 2 – Report**

### **Introduction**

The GLA has allocated a total of £1.4m funding to Harrow Council to deliver projects under the UKSPF themes of (i) Communities and Place and (ii) Supporting Local Businesses. Following consultation with officers and Portfolio Holders, a range of projects have been developed to be funded by the UKSPF to support town centres, parks and open space, and culture and help residents with the cost-of-living crisis.

These projects have been identified as they address the Council's Corporate Policies, of A Council that Puts Residents First; A Borough that is Clean and Safe; A Place where those in Need are Supported.

Specifically, the projects under Communities and Place address the objective to develop more community facilities and amenities that residents want, so Harrow becomes the place they want to spend their time and money, creating a thriving local economy and supporting our local businesses. The Energy Advice and Support for Cost-of-Living project supports the "A Place where those in Need are Supported" Priority.

## **Options considered**

Option A To enter into a Grant Agreement with the GLA

This would secure £1.4m direct funding to Harrow Council to deliver projects to improve Harrow as a place, and to support residents and businesses.

Option B To do nothing - Not to enter into an agreement with the GLA

This would mean that the council would not receive the £1.4m funding from the UKSPF and would be unable to deliver the projects identified.

## **Preferred Option**

Option A is the preferred option because it enables the Council to receive the £1.4m funding from the UKSPF in order to deliver the projects identified and also enables the Council to seek to maximise its grant funding over FYs 2023/24 and 2024/25

## **Background**

The UK Shared Prosperity Fund (UKSPF) replaces European Union funding (specifically European Structural and Investment Fund). The UK government has established three UKSPF investment priorities:

- Communities and Place
- Supporting local business
- People and Skills

The GLA as the Lead Authority to manage UKSPF in London submitted an Investment Plan to government at the end of July 2022 to show how it proposed to spend the UKSPF across London and summarise the outputs and outcomes that the funding would deliver.

The GLA Investment Plan allocated some of the UKSPF under the Communities and Place and Supporting Local Business themes directly to each London borough. Boroughs were required to submit proposals to the GLA in October 2022, setting out the proposed projects, spend and related outputs and outcomes to be delivered under these two themes. Table 1 below summarises the projects that it is proposed to fund under UKSPF under these 2 themes and by Portfolio Holder.

The GLA has since reviewed all borough proposals and checked information against the GLA's UKSPF Investment Plan submitted to government. A request for further information for Harrow's proposals including the need to set out the outputs/outcomes by quarter and review the outputs and outcomes following clarification of their definitions was submitted to the GLA in December 2022. These revised proposals have now been agreed by the GLA.

To access this funding, the Council is now required to sign a Grant Funding Agreement (GFA) with the GLA. The revised outputs and outcomes information submitted in December form part of the council's GFA and will be used to monitor performance over the lifetime of the UKSPF programme.

It should be noted that the GFA has been drafted to reflect the standard clauses in the GLA's UKSPF Memorandum of Understanding with the UK Government. As such, the GLA has stated that it is not possible to renegotiate

the standard clauses or wording. It should also be noted that by acting as the Lead Authority, the GLA is tied to the UK Government's UKSPF requirements. The key implication for Harrow as one of the London Boroughs receiving a direct allocation is that the GFA includes a clause that allows the GLA to reduce the amount of grant paid to Harrow as a result of the Secretary of State withholding or reducing UK Shared Prosperity Funding under its Memorandum of Understanding with the GLA.

**Table 1 Summary of Projects by Portfolio and UKSPF Theme**

<b>Project Name</b>	<b>Project Summary</b>	<b>UKSPF Allocation Capital FYs 22/23-24/25</b>	<b>UKSPF Allocation Revenue FYs 22/23-24/25</b>	<b>UKSPF Theme</b>
<b>Community and Culture portfolio</b>				
Harrow Cultural Assets - New archive & gallery space	Use the UKSPF to improve access to the borough's cultural assets, including for example the Council's public borough archive	£123,456	£30,048	Communities and Place
Harrow Arts Centre - Phase 2	Phase 2 of the HAC development (total cost £1.7m) will lead to the demolition of the existing Greenhill Portakabin and creation a larger New Build of 2 storeys, circa 450m <sup>2</sup> . UKSPF funding will provide resources for roof lights, solar panels (PVs), an additional window, and contribute to public realm improvements. These are for elements of Phase 2 that had previously been "value engineered" out of the build due to lack of funds.	£111,490	£18,090	Communities and Place
Support to Parks and Open Spaces	Capital funding will be used to <ul style="list-style-type: none"> <li>support large and small interventions to create, enhance and improve the management of grassland, woodland,</li> </ul>	£182,400	£22,080	Communities and Place

Project Name	Project Summary	UKSPF Allocation Capital FYs 22/23-24/25	UKSPF Allocation Revenue FYs 22/23-24/25	UKSPF Theme
	<p>wetland and other habitats in public green spaces. There will be a particular focus on the creation of new meadow / wood meadow areas.</p> <ul style="list-style-type: none"> <li>• Provide grant funding to Park User Groups (PUGs)</li> <li>• Employ a project officer to assist in delivery</li> </ul> <p>Revenue funding will be used to support PUGs, and Harrow Nature Conservation Forum volunteers, through appropriate training e.g. in the use of equipment.</p>			
Support for the voluntary sector	Funding will be used to provide support to voluntary groups (Park User Groups, Harrow Nature Conservation Forum)	N/A	£77,088	Communities and Place
<b>PH Sub Total</b>		<b>£417,346</b>	<b>£147,306</b>	
<b>Environment and Community Safety Portfolio</b>				
Energy advice and support for cost of living	<p>Funding will be used to</p> <ul style="list-style-type: none"> <li>• Provide advice via Seasonal Health Intervention Network SHINE to promote measures to increase energy efficiency measures e.g. insulation, etc</li> <li>• Employ a dedicated support officer to promote energy</li> </ul>	N/A	£157,440	Communities and Place

<b>Project Name</b>	<b>Project Summary</b>	<b>UKSPF Allocation Capital FYs 22/23-24/25</b>	<b>UKSPF Allocation Revenue FYs 22/23-24/25</b>	<b>UKSPF Theme</b>
	efficiency and retrofit opportunities			
<b>PH Sub Total</b>		<b>N/A</b>	<b>£157,440</b>	
<b>Business, Employment &amp; Property Portfolio</b>				
Harrow High Street Fund	Funding will be used as additional capital funding to support the existing Harrow High Street Fund	£275,600	£30,528	Communities and Place
Business Engagement	To raise awareness of business support services available	N/A	£81,600	Supporting Local Business
Business Support	To provide tailored business advice to individual businesses - targeting women, young people, and disabled people (including business owners and sole traders with mental health concerns)	N/A	£213,600	Supporting Local Business
Reuse Laptop and Mobile Phones Start Up Kit Project	Informed by an existing pilot, the project seeks to target new start-ups and provide them with reused and repaired laptops to assist with business operations and admin.	N/A	£37,915	Supporting Local Business
<b>PH Sub Total</b>		<b>£275,600</b>	<b>£363,643</b>	
<b>Monitoring and Evaluation Costs@4%</b>			£56,723	

### **Consultation**

In developing these proposals, the council consulted with several representative groups and organisations and built on previous consultations for example on Harrow Arts Centre and with councillors on High Streets. Consultees have included: North-West London Chamber of Commerce, Metro bank, West London Business, HA1BID. Traders Associations, Park User Groups, West London Energy Officers' Group and West London consortium retrofit delivery model.

## Implications of the Recommendation

### Considerations

By entering into the Grant Funding Agreement (GFA) with the GLA, the Council is bound by the terms of the agreement. This includes:

- The GLA's monitoring requirements, including the need for the council to submit quarterly claim submissions
- The grant review and claims process
- A requirement to accord with branding guidelines issued by the Secretary of State, the UK government, or the GLA

Further details are given in the Resources/Costs, Legal Implications and Finance Implications in this report.

### Grant Review

The GLA will review the delivery of Harrow's projects annually and confirm whether the project activities and the funding agreement should continue in line with existing plans.

### Resources, costs

#### Grant Claims & Payments

The GLA Grant Funding Agreement sets out the payment schedule and terms that the council must meet to obtain the funding from the GLA. Table 2 below sets out the GLA's proposed payment schedule.

A first payment will be received by the council on signing of the GFA.

After an initial grant claim for the financial year 2022/23, Harrow Council as Project Deliverer must submit a further eight quarterly progress claims over the financial years 2023/24 and 2024/25 which are to be signed by the section 151 officer.

Harrow will be required to keep detailed records of all expenditure, including evidence of the expenditure and the defrayal, and provide this upon request by the GLA. The GLA may periodically request to see a detailed breakdown of expenditure and supporting evidence.

**Table 2: UKSPF Payment Schedule**

<b>Milestone no.</b>	<b>Headline Milestone Description</b>	<b>Timing of payment</b>	<b>Amount of UK SPF Payment (Capital and Revenue)</b>
1st Milestone	Payment of 2022/23 allocation made on the signing of the grant funding agreement and receipt by the GLA	Jan-Mar 2023	Communities and Place: £357,022 Supporting Local Business: £115,665

2nd Milestone	Your 2023/24 allocation will be paid, provided that satisfactory progress is being made against delivery of the activities set out in the proposal and forecast outputs and outcomes for the previous financial years have been met, or failing that, that there is a credible plan agreed to address underperformance.	Jul-Sep 2023	Communities and Place: £357,022  Supporting Local Business: £115,665
3rd Milestone	90% of your 2024/25 allocation will be paid, provided that satisfactory progress is being made against delivery of the activities set out in the proposal and forecast outputs and outcomes for the previous financial years have been met, or failing that, that there is a credible plan agreed to address underperformance.	Jul-Sep 2024	Communities and Place: £321,317  Supporting Local Business: £104,100
4th Milestone	10% of your 2024/25 allocation will be released upon satisfactory completion of activity.	Apr 2025	Communities and Place: £35,702  Supporting Local Business: £11,565

### Staffing/workforce

Some of the UKSPF funding will be used to employ staff to deliver the project(s) in the relevant service area. These costs were included in the Council's submission to the GLA. This includes:

- A Project Officer for the Energy Advice and Support for Cost-of-living project
- A Project Officer/Park Ranger for the Support to Parks and Open Spaces

### Ward Councillors' comments

Not applicable

### Performance Issues

The Grant Funding Agreement (GFA) includes the following outputs and outcomes that the council has agreed to deliver as

### Communities and Place Outputs and Outcomes

Outputs		
<b>Harrow High Street Fund</b>	E1: Amount of public realm created or improved square metres (m2)	<b>280</b>
<b>Harrow Arts Centre - Phase 2</b>	E1: Amount of commercial completed or improved (m2)	<b>400</b>
	E1: Amount of public realm created or improved (m2)	<b>50</b>
	E4: Number of Tourism, Culture or heritage assets created or improved (numerical value)	<b>1</b>



<b>Support to parks and open spaces</b>	E3: Amount of green or blue space created or improved (m2)	<b>100000</b>
	E3: Number of trees planted (numerical value)	<b>1000</b>
<b>Harrow Cultural Assets (Archive &amp; Gallery)</b>	E4: Number of Tourism, Culture or heritage assets created or improved (numerical value)	<b>1</b>
<b>Support for voluntary sector</b>	E9: Number of volunteering opportunities supported (numerical value)	<b>1450</b>
<b>Energy advice &amp; cost of living project</b>	E13: Number of organisations receiving non-financial support (numerical value)	<b>60</b>
	E13: Number of households receiving support (numerical value)	<b>800</b>

<b>Outcomes</b>		
<b>Harrow High Street Fund</b>	E1: Jobs created (numerical value)	<b>92</b>
	E1 Jobs safeguarded (numerical value)	<b>1</b>
	Reduced vacancy rates (% decreased). The baseline is 4.57% in 2021-22 and our target is a reduction by 0.57% to 4% by 2024-25. This equates to a 12.4% overall improvement in our vacancy rates.	<b>12.4% reduction</b>
<b>Harrow Arts Centre - Phase 2</b>	E1: Jobs created (numerical value)	<b>3</b>
	E1: Jobs safeguarded (numerical value)	<b>10</b>
	E4: Improved perceived/experienced accessibility (numerical value)	<b>1</b>
	Increased visitor numbers (%). The baseline is 182,000 visitors in 2021-22 and our target is a 5% increase by 2024-25.	<b>5% increase</b>
<b>Support to parks and open spaces</b>	E3: Increased visitor numbers (numerical value)	<b>1350</b>
	E3: Increased use of cycleways or paths (numerical value)	<b>700</b>
<b>Harrow Cultural Assets (Archive &amp; Gallery)</b>	E4: Improved perceived/experienced accessibility (numerical value)	<b>1</b>
<b>Support for voluntary sector</b>	E9: Improved engagement numbers (numerical value)	<b>500</b>
<b>Energy advice &amp; cost of living project</b>	E13: Increased take up of energy efficiency measures (numerical value)	<b>160</b>

### **Supporting Local Business Outputs and Outcomes**

<b>Outputs</b>		
<b>Business Engagement</b>	E23: Number of enterprises receiving non-financial support (numerical value)	<b>200</b>
<b>Business Support</b>	E23: Number of enterprises receiving non-financial support (numerical value)	<b>90</b>
<b>Reuse Laptop and Mobile Phones</b>	E23: Number of enterprises receiving non-financial support (numerical value)	<b>20</b>

<b>Start Up Kit Project</b>		
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<b>Outcomes</b>		
<b>Business Engagement</b>	E23: Jobs created (numerical value)	<b>1</b>
	E23: Jobs safeguarded (numerical value)	<b>1</b>
<b>Business Support</b>	E23: Jobs created (numerical value)	<b>1</b>
	E23: Jobs safeguarded (numerical value)	<b>1</b>
	E23: Number of new enterprises created (numerical value)	<b>10</b>
	E23: Number of enterprises adopting new or improved products or services (numerical value)	<b>40</b>
<b>Reuse Laptop and Mobile Phones Start Up Kit Project</b>	E23: Jobs created (numerical value)	<b>1</b>
	E23: Jobs safeguarded (numerical value)	<b>1</b>
	E23: Number of enterprises adopting new or improved products or services (numerical value)	<b>10</b>

### **Environmental Implications**

The Support to Parks and Open Spaces project and the Energy Advice & Cost of Living Project will support the Council's climate change strategy by creating and/or enhancing grassland, woodland, wetland and other habitats in public green spaces, and by helping residents reduce their energy consumption.

The Reuse Laptop and Mobile Phones Start Up Kit Project will reduce the number of laptops and mobile phones being discarded.

### **Data Protection Implications**

Data Protection implications will be considered at the project delivery stage for each project. Processes are already in place for the Volunteering and Business Support programmes.

### **Risk Management Implications**

Risks included on corporate or directorate risk register? **No**

Separate risk register in place? **No** but separate risk registers will be developed for each project

The relevant risks contained in the register are attached/summarised below.  
**Yes**

The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
<b>Risks related to entering into the UKSPF Funding Agreement with the GLA</b>		
If the recommendations in the report are not agreed the Council would not receive the £1.4m funding from the UKSPF and would be unable to deliver the projects identified or seek to maximise its grant funding during FYs 2022/23, 2023/24 and 2024/25	<ul style="list-style-type: none"> <li>▪ Acceptance of the report's recommendations will fully mitigate this risk</li> </ul>	<b>Green</b>
Better and more deserving projects in the borough have not been selected to receive the UKSPF funding	<ul style="list-style-type: none"> <li>▪ Extensive consultation was undertaken with key stakeholders to identify the projects for the funding, including members of the Harrow Business Forum, trading associations, Park User Groups, the West London Energy Officers' Group and the West London consortium retrofit delivery model.</li> </ul>	<b>Green</b>
The Council does not fully comply with the terms and conditions of GLA funding from the UK Shared Prosperity Fund, for example in regard to the grant review and claims process, leading to funding being delayed, withheld or ceasing	<ul style="list-style-type: none"> <li>▪ Programme Manager appointed as a dedicated officer to oversee this process including stringent internal financial management processes and regime by the finance directorate</li> <li>▪ Guidelines have been issued by the GLA on compliance which we are following closely</li> <li>▪ Any issues would be escalated to Director-level</li> </ul>	<b>Green</b>
The Council has insufficient resources and/or dedicated staff in place to effectively administer and account for the grant	<ul style="list-style-type: none"> <li>▪ Programme Manager appointed as a dedicated officer to oversee this process including stringent internal financial management processes and regime by the finance directorate</li> </ul>	<b>Green</b>

Risk Description	Mitigations	RAG Status
The GLA does not meet the terms of its MOU with central government leading to a reduction or the cessation of funding from the GLA	<ul style="list-style-type: none"> <li>▪ If this happened projects would be reviewed and scaled down to meet and recognize the financial resources available to us</li> </ul>	<b>Green</b>
Delay in GLA finalising the Grant Funding Agreement (GFA) with Harrow Council	<ul style="list-style-type: none"> <li>▪ A draft GFA has already been reviewed by HB Public Law. Comments on the GFA have been sent to and agreed by the GLA before the final GFA is issued.</li> </ul>	<b>Green</b>
Delay in funding being paid especially for 2022/23 could delay delivery of project(s)	<ul style="list-style-type: none"> <li>▪ Projects have been designed to take account of delay in funding being paid in time. Most of the projects are not planned to start spending until 2023/24.</li> </ul>	<b>Green</b>
Reduction in the Grant paid to Harrow Council because of the Secretary of State withholding or reducing UK Shared Prosperity Funding under its Memorandum of Understanding (MOU) with the GLA.	<ul style="list-style-type: none"> <li>▪ Harrow to ensure that it meets the requirements of its GFA with the GLA including, for example the need for the council to submit quarterly claim submissions.</li> <li>▪ In the case of any reductions in funding, projects will be scaled down accordingly as indicated above.</li> <li>▪ However, Harrow is relying on the other London boroughs and the GLA to ensure that the GLA meets the terms of its MOU with the Government.</li> </ul>	<b>Green</b>

Risk Description	Mitigations	RAG Status
<b>Risks Relating to Project Delivery</b>		
<p>The Council's level of performance/delivery on the completion of project headline milestones is weak/unsatisfactory leading to it being unable to attract or sustain continued funding</p>	<ul style="list-style-type: none"> <li>▪ Programme Manager appointed as a dedicated officer to oversee this process including stringent internal financial management processes and regime by the finance directorate</li> <li>▪ Project-level reviews are built into the regular monitoring process carried out internally on projects to identify any projects not on track</li> <li>▪ Any significant issues on delivery would be escalated to Director-level</li> </ul>	<b>Green</b>
<p>Delay in funding being paid at each milestone stage could delay delivery of project(s)</p>	<ul style="list-style-type: none"> <li>▪ A Programme Manager has been appointed to ensure that all projects remain on track with the agreed outputs and outcome targets to ensure each payment milestone is met.</li> <li>▪ Also see mitigations above</li> </ul>	<b>Green</b>
<p>Materials and labour shortages occur leading to significant delays on the completion of projects</p>	<ul style="list-style-type: none"> <li>▪ Regular projects reviews are in place to identify any issues in this area</li> <li>▪ We would also seek agreement with the GLA on alternative outputs and outcomes and the way forward if significant shortages should occur</li> </ul>	<b>Green</b>
<p>Project costs increase due to both foreseen (e.g. inflation) and unforeseen circumstances</p>	<ul style="list-style-type: none"> <li>▪ All the projects have been developed with a contingency plan including whether the project can be reduced in scale if needed</li> </ul>	<b>Green</b>

## **Procurement Implications**

Any procurement arising from the recommendations set out in the recommendations of this report will be undertaken in compliance with the Public Contract Regulations 2015 and the Contract Procedure Rules.

## **Legal Implications**

The GLA's draft UKSPF Grant Funding Agreement (GFA) has been considered by HB Public Law. The main legal implications of signing the GFA are highlighted in the report, noting that as the GFA has been drafted to reflect the GLA's Memorandum of Understanding with the UK Government, it is not possible to renegotiate the standard clauses or wording.

## **Financial Implications**

Total grant allocated under the themes of Communities and Place, and Supporting Local Business is £1.148m. This consists of £0.722m of capital funding and £0.696m of revenue funding. Financial monitoring arrangements have been put in place to ensure that the spend is in accordance with the proposals approved by the GLA and accurate financial information is used for each quarterly progress claim.

## **Equalities implications / Public Sector Equality Duty**

An Equalities Impact Assessment (EqIA) has been undertaken for the UKSPF programme (see Appendix A)

The key EqIA findings are as follows:

### **Communities and Place**

We do not anticipate that the Communities and Place projects will have a negative impact on Harrow residents or result in any direct or indirect discrimination of any group that shares protected characteristics.

Outcomes include the development of more community facilities, cultural assets and capacity building for resident led volunteer groups while the Energy advice and support offer will help residents with the cost of living.

### **Supporting Local Business**

The Business Engagement and Business Support project will be open to everyone and will include targeted support for women in business, young people (aged 18-30) and disabled people.

The rationale for building in targeted support is to help to advance the equality of opportunity by addressing the inequalities that these groups face with business start-up, business survival and access to new contracts.

The EqIA makes the following recommendations for the Supporting Local Business Theme:

- The business support provider will ensure that there is provision in place to provide generic business information, advice and guidance to anyone that registers an interest.
- There will also be signposting available to those requiring more intensive support.

In developing the proposals for each of the projects, consideration has been given to ensure that they meet the council's public sector equality duty.

## Council Priorities

The section below summarises how the various projects deliver in relation to the Council's Corporate Plan.

### A borough that is clean and safe

Project Name	Corporate Plan Action	Corporate Plan Workstream
Harrow High Street Fund	Invest in the physical infrastructure of Harrow	Improve appearance of key district centres.
Harrow Arts Centre - Phase 2	Protecting the character of Harrow	Creation of new space for rent at Harrow Arts Centre.
Support to parks and open spaces/ Support for voluntary sector	Provide excellent green and cultural spaces for our residents	Promote nature recovery on public land and parks increasing more trees and grow more wildflowers and biodiversity net gain
Harrow Cultural Assets (Archive & Gallery)	Provide excellent green and cultural spaces for our residents  Protecting the character of Harrow	Not applicable
Business Engagement	Improve business engagement	Not applicable

### A place where those in need are supported

Project Name	Corporate Plan Action	Corporate Plan Workstream
Energy advice & cost of living project	Target support to help residents out of financial hardship	Information, Advice & advocacy strategy
Re-use laptop and mobile phone start up kit	Target support to help residents out of financial hardship	Not applicable

## **Section 3 - Statutory Officer Clearance**

**Statutory Officer: Dawn Calvert**

Signed by the Chief Financial Officer

**Date: 02/03/23**

**Statutory Officer: Puja Shah**

Signed on behalf of the Monitoring Officer

**Date: 23/02/23**

**Chief Officer: Dipti Patel**

Signed off by the Corporate Director

**Date: 03/03/23**

**Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 21/02/23**

**Head of Internal Audit: Neale Burns**

Signed on behalf of the Head of Internal Audit

**Date: 02/03/23**

**Has the Portfolio Holder(s) been consulted? Yes**

## **Mandatory Checks**

**Ward Councillors notified:** NO as it impacts on all Wards

**EqIA carried out:** YES

**EqIA cleared by:** Yasmeen Hussein 16/12/22

## **Section 4 - Contact Details and Background Papers**

**Contact:** David Sklair – External Funding Manager

[David.Sklair@harrow.gov.uk](mailto:David.Sklair@harrow.gov.uk)

**Background Papers:**

- UKSPF Borough Proposal Template Communities & Place Harrow
- UKSPF Borough Proposal Template Support Local Business Harrow
- LB Harrow Quarterly Profile v2



- GLA UKSPF Grant Funding Agreement

**Call-in waived by the Chair of Overview and Scrutiny Committee - NO**

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### You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)		
<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	UK Shared Prosperity Fund – Harrow's Direct Allocation Proposed Spend	<b>Date EqIA created 01/12/2022</b>
<b>Name and job title of completing/lead Officer</b>	Mavis Kusitor, Economic Strategy Programme Manager	
<b>Directorate/ Service responsible</b>		
Organisational approval		
<b>EqIA approved by EDI Policy Officer</b>	<b>Name: Yasmeen Hussein</b>	<b>Signature</b> <input checked="" type="checkbox"/> <b>Tick this box to indicate that you have approved this EqIA</b>  <b>Date of approval: 16/12/22</b>

## 1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

(to be completed **after** you have completed sections 2 - 5)

### a) What is your proposal?

The UK Shared Prosperity Fund (UKSPF) is a central pillar of the UK government's ambitious Levelling Up agenda and a significant component of its support for places across the UK. It provides £2.6 billion of new funding for local investment by March 2025, with all areas of the UK receiving an allocation from the Fund via a funding formula rather than a competition.

It seizes the opportunities of leaving the European Union, by investing in domestic priorities and targeting funding where it is needed most: building pride in place, supporting high quality skills training, supporting pay, employment and productivity growth and increasing life chances

Harrow Council has been allocated £1.4m of funding to deliver projects under the UKSPF themes of Communities and Place and Supporting Local Business. Our proposal is to deliver a range of projects to be funded by the UKSPF to support our local businesses, town centres, parks and open space, culture and help residents with the cost-of-living crisis.

The projects aim to develop more community facilities and amenities that residents want, so Harrow becomes the place they want to spend their time and money, creating a thriving local economy and supporting our local businesses, while the Energy advice and support for cost-of-living project. The projects are summarised in the below table:

Project Name	Project Summary	UKSPF Theme
New archive - Headstone Manor & Museum	Further to completion of a Feasibility Study, capital funding will be used to provide match funding for a National Lottery Heritage Fund application to create a new public borough archive, collections store and museum office building.  Alternatively, if the Feasibility Study show that a larger project is not deliverable, the funding will be used to enhance storage and access to the existing Archive.	Communities and Place

Harrow Arts Centre - Phase 2	Phase 2 of the HAC development (total cost £1.7m) will lead to the demolition of the existing Greenhill Portakabin and creation a larger New Build of 2 storeys, circa 450m2. UKSPF funding will provide resources for roof lights, solar panels (PVs), an additional window, and contribute to public realm improvements. These are for elements of Phase 2 that had previously been "value engineered" out of the build due to lack of funds.	Communities and Place
Support to Park User Groups & Litter Picking	<p>Capital funding will be used to:</p> <ul style="list-style-type: none"> <li>(i) support large and small interventions to create, enhance and improve the management of grassland, woodland, wetland and other habitats in public green spaces. There will be a particular focus on the creation of new meadow / wood meadow areas.</li> <li>(ii) Provide grant funding to Park User Groups (PUGs)</li> <li>(iii) Employ project officer to assist in delivery</li> </ul> <p>Revenue funding to support PUGs, volunteer litter pickers and HNCV volunteers, through appropriate training e.g., in the use of equipment.</p>	Communities and Place
Volunteering	Funding will be used to provide support to voluntary groups - Parks Users Group, Harrow Nature Conservation Forum	Communities and Place
Harrow High Street Fund	Funding will be used as additional capital funding to support the existing Harrow High Street Fund	Communities and Place
Energy advice and support for cost of living	<p>Funding will be used to</p> <ul style="list-style-type: none"> <li>- Provide advice via Seasonal Health Intervention Network (SHINE) to promote measures to increase energy efficiency measures e.g., insulation, etc</li> <li>- Employ a dedicated support officer to promote energy efficiency and retrofit opportunities</li> </ul>	Communities and Place
Business Engagement and Support	<p><b>Projects</b></p> <ul style="list-style-type: none"> <li>I. Business Engagement - outreach service to raise awareness of business support services including projects, meetings, workshops, subsidised test trade spaces and consultation activities</li> </ul>	Supporting Local Business

	<p>II. Business Support - a dedicated business support service to all businesses offering tailored support via a one-on-one and group setting support, both online and in-person. This will include targeted support for women, young people aged 18-30 and disabled people.</p> <p>III. Reuse Laptops and Mobile Phones Start Up Kit – support for new start-ups providing them with reused and repaired laptops to assist with business operations and admin.</p>		
<p><b>b) Summarise the impact of your proposal on groups with protected characteristics</b></p> <p><b>Supporting Local Business</b></p> <ol style="list-style-type: none"> <li>1. The Business Engagement and Business Support project will be open to everyone and will include targeted support for women in business, young people (aged 18-30) and disabled people.</li> <li>2. The rationale for building in targeted support is to help to advance the equality of opportunity by addressing the inequalities that these groups face with business start-up, business survival and access to new contracts.</li> <li>3. Harrow's population is 261,300 (2021 census) consisting of 132,500 women (50.7%) and 128,800 men (49.3%), this is almost a 50/50 split. However, data gathered from the Beauhurst platform shows that female led businesses are underrepresented amongst new business start-ups in the borough with just 26% of business registrations reported between March and July'22.</li> <li>4. There are also particular groups that have specific obstacles in progressing to the labour market or sustaining self-employment. These include adults with learning disabilities and those with severe mental health issues.</li> <li>5. Disabled people are also likely to be under-represented among business owners within Harrow.</li> </ol> <p><b>Communities and Place</b></p> <ol style="list-style-type: none"> <li>6. We do not anticipate that the Communities and Place projects will have a negative impact on Harrow residents or result in any direct or indirect discrimination of any group that shares protected characteristics.</li> <li>7. Outcomes include the development of more community facilities, cultural assets and capacity building for resident led volunteer groups while the Energy advice and support offer will help residents with the cost of living.</li> </ol>			
<p><b>b) Summarise any potential negative impact(s) identified and mitigating actions</b></p> <ul style="list-style-type: none"> <li>- Men, people over the age of 30 and those without a disability may be excluded from some of the messaging and outreach activities. There will be an element of generic business support that will be available to everyone regardless of their gender, age and disability status – no one will be turned away without an offer of support or signposting to other services.</li> </ul>			

- There is limited data on Harrow's large micro-business sector, in terms of ownership by protected characteristics. Therefore, it is recommended that work is undertaken to gather baseline data, to ensure that the borough can respond to the needs of local businesses. Equality monitoring will form part of the performance monitoring process for all projects.



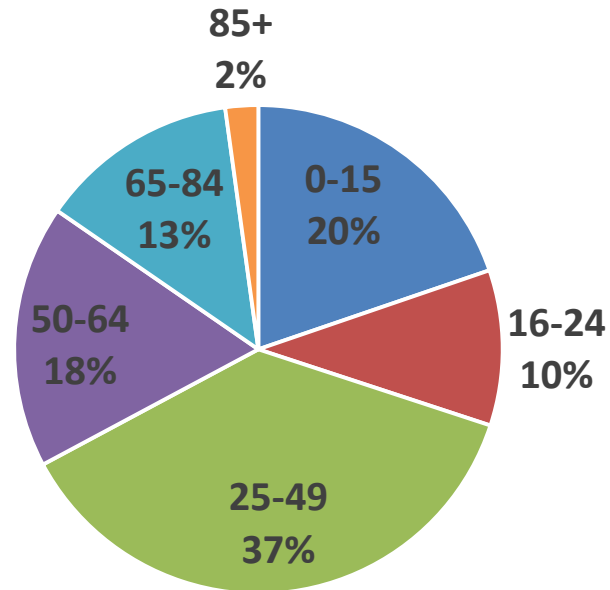
<b>2. Assessing impact</b>					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <a href="#">borough profile data</a> , <a href="#">equalities data</a> , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on <b>each</b> group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
<b>Age</b>	Harrow has a resident population of 261,300 <sup>1</sup> . Increasing by 9.3% in the ten years between 2011 and 2021 with an increase of 7.8% in people aged 15 to 64 years, It has an above average working age population aged 16-64 of just under 64% (160,462) and a growing younger population aged 0-15 of 18.5% (48,300), which is higher than the London average, suggesting that the borough is a popular destination for families <sup>2</sup> .	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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<sup>1</sup> Census 2021

<sup>2</sup> Census 2021

**Population by Age band %  
(Harrow 2021 Census)**



- As with most areas in the country, the borough has an ageing population. With the number of residents aged 65 plus increasing by 19.4% in the ten years between 2011 and 2021 with 31% rise in people aged 90 years and over<sup>3</sup>. Those aged 85 plus could increase by 60% by 2030<sup>4</sup>.
- Data available shows that the pandemic has adversely impacted young people aged 18-24, with 1 in 10 young people out of work<sup>5</sup>.

<sup>3</sup> Census 2021

<sup>4</sup> Poppi and Pansi projections to 2030

<sup>5</sup> DWP Job claimant data April 2021

	<ul style="list-style-type: none"> <li>Harrow has one of the lowest proportion of young people Not in Education, Employment and Training (NEETS). However, due to the Covid-19 pandemic, there has been a significant increase in numbers, from 0.8% to 1.8%<sup>6</sup>. (Now 1.2% August 2022<sup>7</sup>)</li> </ul> <p><b>Impact</b></p> <p><b>Supporting Local Business</b></p> <ul style="list-style-type: none"> <li>The Business Engagement and Business Support projects will aim to support young entrepreneurs that are aged 18 to 30.</li> <li>The target is 30% of those supported through the programme will fall within this age group.</li> </ul> <p><b>Communities and Place</b></p> <ul style="list-style-type: none"> <li>The projects will aim to support all residents regardless of their age.</li> </ul>				
Disability	<ul style="list-style-type: none"> <li>ONS data for 2016-2018 shows that 19,208, (12.2%) of Harrow's working age population have a disability.</li> <li>There is a strong correlation between disability, in particular the extent of the disability, and economic inactivity.</li> <li>There are also particular groups that have specific obstacles in progressing to the labour market or sustaining self-employment. These include adults with learning disabilities and those with severe mental health issues.</li> <li>Disabled people are also likely to be under-represented among business owners within Harrow.</li> </ul> <p><b>Impact</b></p> <p><b>Supporting Local Business</b></p> <ul style="list-style-type: none"> <li>The Business Engagement and Business Support projects will aim to support disabled residents.</li> <li>This project will be linked in with mainstream services such as the NHS Community Mental Health Team, Able Futures and Maximus.</li> <li>The target is that up to 15% of those supported through the programme will be classified as having a disability.</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>6</sup> NEETS data at December 2020.

<sup>7</sup> NEETS data at December 2022.

	<p><b>Communities and Place</b></p> <ul style="list-style-type: none"> <li>The projects will aim to support all residents regardless of their disability status.</li> </ul>				
<b>Gender reassignment</b>	<ul style="list-style-type: none"> <li>In 2020, the Equality and Human Rights Commission (EHRC) survey found that one in six respondents identified themselves as prejudiced towards transgender people<sup>8</sup>.</li> <li>There is limited national data collected for this characteristic. We will need to consider the inequalities and discrimination experienced for this protected group when data becomes available.</li> <li>The charity Gender Identity Research &amp; Education Society (GIRES) estimated in their Home Office funded study in 2009 the number of transgender people in the UK to be between 300,000 and 500,000. More recently Stonewall advised that it is estimated that around 1% of the population might identify as trans, including people who identify as non-binary. This would represent about 600,000 trans and non-binary people in Britain and about 2,500 people in Harrow.</li> </ul> <p><b>Impact</b></p> <p><b>Supporting Local Business</b></p> <ul style="list-style-type: none"> <li>The Business Engagement and Business Support projects will aim to support at women in business.</li> <li>Anyone that identifies themselves as a women will be included in this targeted support. No one will be rejected access to the services based on their gender identity.</li> </ul> <p><b>Communities and Place</b></p> <ul style="list-style-type: none"> <li>The projects will aim to support residents regardless of their gender reassignment status.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Marriage and Civil Partnership</b>	<ul style="list-style-type: none"> <li>At the time of the 2021 Census 53.9% of Harrow's residents were married or in a registered civil partnership, which was the highest level in London.</li> <li>21% of households were married, or in same-sex civil partnerships, with dependent children, the highest level in London.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>8</sup> Equality and Human Rights Commission (2020), Attitudes transgender people, 2020

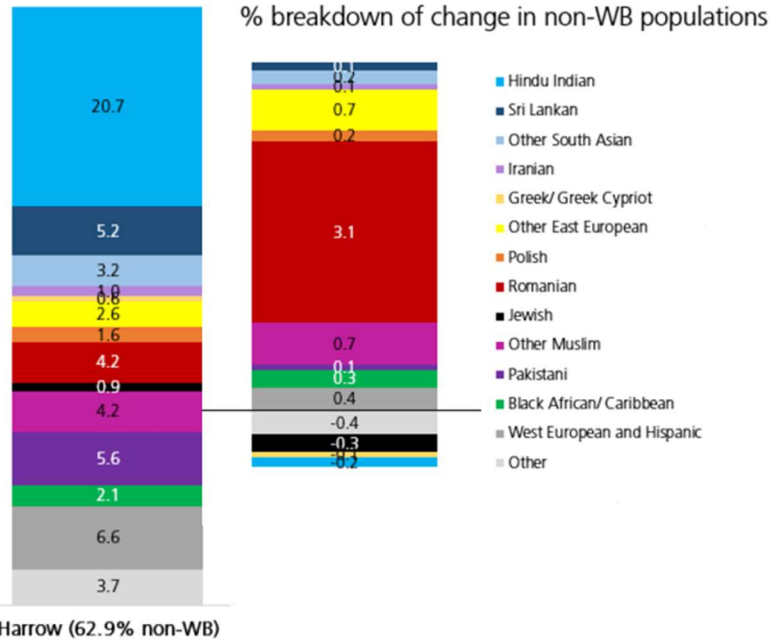
	<ul style="list-style-type: none"> <li>At October 2020 there have been 144 Same Gender Civil Partnerships in Harrow, 25 of which has been converted to a Marriage. There have been 8 Opposite Gender Civil Partnerships. There have been 57 Same Sex marriages.</li> </ul> <p><b>Impact</b> <b>Supporting Local Business</b> The projects will aim to support residents regardless of their marriage and civil partnership status.</p> <p><b>Communities and Place</b> The projects will aim to support residents regardless of their marriage and partnership status.</p>				
Pregnancy and Maternity	<ul style="list-style-type: none"> <li>ONS births figures show Harrow as having 3,312 live births in 2021<sup>9</sup>. 14 live births per 1000 population is higher than the England &amp; Wales average of 10.8</li> <li>The borough has a higher-than-average infant mortality rate in London, at a rate of 3.9 deaths per 1000 live births, which is an indicator of poverty and inequality in the borough.<sup>10</sup></li> <li>Nationally, women have faced discrimination during pregnancy and maternity in the workplace. EHRC Survey data shows that around one in nine mothers (11%) reported that they were either dismissed; made compulsorily redundant, where others in their workplace were not.</li> </ul> <p><b>Impact</b> <b>Supporting Local Business</b> The projects will aim to support residents regardless of their pregnancy and maternity status, including residents with childcare/caring responsibilities.</p> <p><b>Communities and Place</b> The projects will aim to support residents regardless of their pregnancy and maternity status, including residents with childcare/caring responsibilities.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>9</sup> Source: Office for National Statistics (ONS, 2022), Live births in England and Wales 2021

<sup>10</sup> Public Health England (2022), London's Poverty Profile 2022,

Race/  
Ethnicity

% breakdown of non-WB populations, 2019



- Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents from Black, Asian, and Multi-Ethnic backgrounds and an estimated 20% Eastern European community, which is fast growing<sup>11</sup>. Black African (notably the Somali Community) groups have been fast growing over the last 6 years or so, as has the Afghan community.
- Unemployment rates are significantly higher in certain areas of the borough, particularly in the Wealdstone and Marlborough wards (central Harrow) and Roxbourne (south Harrow), focused in an around the Rayners Lane estate and among residents classified as Black and Other ethnic groups. These areas are also ranked high on the indices of deprivation for the UK.

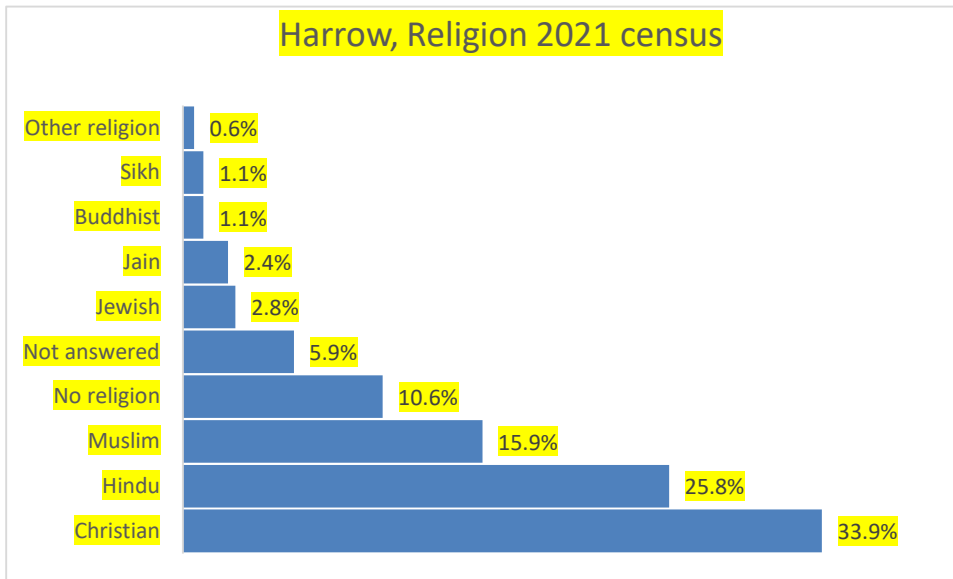
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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<sup>11</sup> Harrow Economic assessment 2019-2020: population

	<ul style="list-style-type: none"> <li>The majority of 16–18-year-olds that are classed as NEET are from BAME backgrounds and located in wards with high levels of deprivation. However, the data also shows that the single largest ethnic group of pupils aged 16-18 classed as NEET is White British.</li> <li>At ward level Marlborough, and Wealdstone have the highest number of households in need of re-housing. These respectively have a BAME population of 77% and 75%.</li> <li>The highest rates of overcrowding is in Greenhill ward (97.5 per 1,000 households) and a BAME population of 74% (2011 census).</li> <li>BAME residents are more likely to experience barriers to employment due to lack of English language, functional and digital skills.</li> <li>Over 94% of Harrow businesses are classed as micro-businesses. There is limited data on the profile of business ownership by protected characteristics. Anecdotal evidence suggests that most retail businesses in Harrow's town centres are BAME- owned.</li> </ul> <p><b>Impact</b>  <b>Supporting Local Business</b>  The projects will aim to support residents regardless of their race and ethnicity.</p> <p><b>Communities and Place</b>  The projects will aim to support residents regardless of their race and ethnicity.</p>				
<b>Religion or belief</b>	<ul style="list-style-type: none"> <li>Religious diversity is strong in Harrow. At the 2011 Census Harrow was the most religiously diverse borough in the country with the highest number Hindus (25%) and Jains (2.2%) and the second highest number of Zoroastrians.</li> <li>At the 2021 census Harrow had the highest number (and proportion) of Hindu followers in the country (25.8%). At 2.8% Harrow 's Jewish community was the ninth largest nationally. 33.9% of residents described themselves as Christians (the 11th lowest proportion in the country) and 15.9% described themselves as Muslims. Harrow had the lowest ranking for 'no religion' (10.9%).</li> <li>As the population's ethnic composition changes, rates of participation in various religions are also likely to change<sup>12</sup>.</li> <li>There is limited data on employment/unemployment rates for Harrow by religion.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>12</sup> Harrow Economic Assessment: 2019-2020: population

- Data for London suggests that educational attainment and employment among the capital's Muslim community is lower than those from other faith groups located in the borough<sup>13</sup>.



**Impact**

**Supporting Local Business**

The projects will aim to support residents regardless of their religion or beliefs.

**Communities and Place**

The projects will aim to support residents regardless of their religion or beliefs.

**Sex**

- The 2021 census show that the total population of Harrow is now 261,300, made up of 132,500 women (50.7%) and 128,800 men (49.3%). Overall, the number of males and females living in Harrow is very similar.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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<sup>13</sup> Annual Population Survey 2018.



	<ul style="list-style-type: none"> <li>• Economic activity among Harrow’s male population is higher than the London average at 86%, compared with 83%<sup>14</sup>. However, economic activity among females in the borough is lower than the London average at 72%.</li> <li>• Harrow is a low wage borough, with both men and women that are employed in the borough earning less than the London average of £760<sup>15</sup> earning less compared to men. Women earn less than men in the borough. Average gross weekly earnings among women working in Harrow is £500, nearly 38% lower than the London average of £688<sup>16</sup>.</li> <li>• 20% of Harrow businesses are female led.<sup>17</sup></li> <li>• While the pandemic may have negatively impacted both sexes, the shift to home working may have had a positive impact in enabling women to return to work, as they are able to share childcare responsibilities.</li> </ul> <p><b>Impact</b></p> <p><b>Supporting Local Business</b></p> <ul style="list-style-type: none"> <li>• The Business Engagement and Support projects will aim to support women in business.</li> <li>• The target is that up to 30% of those supported through the programme will be women.</li> </ul> <p><b>Communities and Place</b></p> <p>The projects will aim to support all residents regardless of their sex.</p>				
<p><b>Sexual Orientation</b></p>	<ul style="list-style-type: none"> <li>• The Office for National Statistics estimated in 2014, 2.6% of Londoners identify as lesbian, gay, or bisexual, the highest of any UK region<sup>18</sup>. There is no official data on sexual orientation for Harrow in relation to employment.</li> <li>• LGBTQ people are also likely to be underrepresented among business owners within Harrow.</li> </ul> <p><b>Impact</b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>14</sup> NOMIS: Labour supply (at December 2020)

<sup>15</sup> NOMIS: earnings by place of work 2020

<sup>16</sup> NOMIS: earnings by place of work: 2020

<sup>17</sup> Beauhurst: number of companies registered at Companies House that are female led (April 2021)

<sup>18</sup> Trust for London: London’s Poverty profile 2016.

	<b>Supporting Local Business</b> The projects will aim to support residents regardless of their sexual orientation.				
	<b>Communities and Place</b> The projects will aim to support residents regardless of their sexual orientation.				
<b>2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?</b> <input type="checkbox"/> Yes                      No <input checked="" type="checkbox"/>					
If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below					
<b>2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?</b> <input checked="" type="checkbox"/> Yes                      No <input type="checkbox"/>					
If you clicked the Yes box, Include details in the space below					
<ul style="list-style-type: none"> <li>The uncertainty of the cost-of-living may harm the growth and survival of businesses. This may also impact resident's ability to commit their time and resources to participate in unpaid volunteering opportunities through the parks and open spaces projects.</li> </ul>					

### 3. Actions to mitigate/remove negative impact

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider, and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact, please state below.	Deadline date	Lead Officer
<p>Men may be excluded from the targeted business support offer for women.</p>	<p>The data provided under the Sex heading in section 2 shows that there is a need to offer targeted provision for women in business. It is lawful under the Equality Act to treat people differently in some circumstances, for example taking positive action or putting in place single-sex provision where there is a need for it.</p> <p>Men will be able to access elements of the business support services. There will not be any additional mitigating measures put in place as the negative impact will be minor.</p> <p>We have consulted with members of the Economic Strategy Steering Group and the Business Forum. Yearly performance reviews will be carried out and may include further consultation depending on the results.</p>	<p>The business support provider will ensure that there is provision in place to provide generic business information, advice and guidance to anyone that registers an interest.</p> <p>There will also be signposting available to those requiring more intensive support.</p>	<p>March 2025</p>	<p>Mavis Kusitor</p>

<p>Over 30s may be excluded from the targeted business support offer for people aged 18-30.</p>	<p>The data provided under the Age heading in section 2 shows that there is a need to offer targeted provision for young people. Data available shows that the pandemic has adversely impacted young people aged 18-24, with 1 in 10 young people out of work.</p> <p>People over the age of 30 will be able to access elements of the business support services. There will not be any additional mitigating measures as the negative impact will be minor.</p> <p>We have consulted with members of the Economic Strategy Steering Group and the Business Forum. Yearly performance reviews will be carried out and may include further consultation depending on the results.</p>	<p>The business support provider will ensure that there is provision in place to provide generic business information, advice and guidance to anyone that registers an interest.</p> <p>There will also be signposting available to those requiring more intensive support.</p>	<p>March 2025</p>	<p>Mavis Kusitor</p>
<p>People without a disability may be excluded from the targeted business support offer for people with a disability.</p>	<p>The data provided under the Disability heading in section 2 shows that there is a need to offer targeted provision for people with a disability. It is both lawful and a requirement of the general equality duty to consider if there is a need to treat disabled people differently, including more favourable treatment where necessary. People without a disability will be able to access elements of the business support services. There will not be any additional</p>	<p>The business support provider will ensure that there is provision in place to provide generic business information, advice and guidance to anyone that registers an interest.</p> <p>There will also be signposting available to those requiring more intensive support.</p>	<p>March 2025</p>	<p>Mavis Kusitor</p>

	<p>mitigating measures as the negative impact will be minor.</p> <p>We have consulted with members of the Economic Strategy Steering Group and the Business Forum. Yearly performance reviews will be carried out and may include further consultation depending on the results.</p>			
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#### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

#### **Include details in the space below**

1. The UKSPF will not result in any direct or indirect discrimination of any group that shares the protected characteristics.
2. The UKSPF Supporting Local Business projects will help to advance the equality of opportunity for women, young people aged 18-30 and people with disabilities by putting provision in place that targets these groups as there is a need for it.
3. The UKSPF Communities and Place projects will help foster good relations between communities through the enrichment of our historical and cultural assets and green spaces whilst building inclusivity and strong community involvement.

**5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies** **Outcome 1**

**No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

 **Outcome 2**

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

 **Outcome 3**

**This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here



**Report for: Cabinet**

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<b>Date of Meeting:</b>	16 <sup>th</sup> March 2023
<b>Subject:</b>	Home Improvement Agency - Extension of existing contract and procurement of Aids & Adaptations and Handy person service
<b>Key Decision:</b>	Yes - procurement of the service will exceed the threshold of £500k
<b>Responsible Officer:</b>	Dipti Patel - Corporate Director of Place David McNulty – Divisional Director of Housing
<b>Portfolio Holder:</b>	Councillor Mina Parmar - Portfolio Holder for Housing
<b>Exempt:</b>	No, except for appendices 1,2,3,4 and5 which are exempt under paragraph 3 of Part I of Schedule 12A to the Local Government Act 1972 as they contain information relating to the financial or business affairs of any particular person (including the authority holding that information)
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All Wards
<b>Enclosures:</b>	Appendix 1 (EXEMPT) – ITT Aids & Adaptations 2023 Appendix 2 (EXEMPT) – Lot 1 Adaptations Spec 202 Appendix 3 (EXEMPT) – Lot 2 Handyperson Repairs Spec 2023 Appendix 4 (EXEMPT) - Lot 1 Std Non Std Adaptations Pricing Schedule Appendix 5 (EXEMPT) – Lot 2 – Handyperson Pricing schedule

## Section 1 – Summary and Recommendations

This report seeks authority from Cabinet to extend the existing framework and procure a new framework agreement for Contractors to deliver Adaptations for People with disabilities across all tenures, and to provide a Handyperson Service. The report also seeks delegated authority to award contracts following the outcome of the procurement process.

### Recommendations:

Cabinet is requested to:

- 1) Approve a 5-month extension to all providers on Lot 1 and Lot 2 from 20<sup>th</sup> May 2023 until 19<sup>th</sup> October 2023
- 2) Approve the commencement of the re-procurement of a framework agreement for the following two Lots for four years:
  - Lot 1 – Standard and Nonstandard Aids and Adaptations
  - Lot 2 – Handyperson Service
- 3) Note that the total value of the framework over the four years will be £10,749,680
- 4) Delegate authority to the Corporate Director of Place, following consultation with the Portfolio Holder for Housing, to award and appoint contractors to the Framework and to call-off and arrange the execution of contracts with the successful tenderers.

**Reason: (For Recommendations)** To comply with the Council's Contract Procedure Rules and Financial Regulations, due to the aggregate estimated value of the potential call-off contracts under the Framework Agreement.

## Section 2 – Report

### 1.0 Introduction

- 1.1 In February 2017 Cabinet agreed the appointment of contractors to the framework to deliver Adaptations for disabled residents across all tenures and provide the Handyperson service for 3 years with an option to extend up to one further year.
- 1.2 The current arrangement has worked well overall and contractors complete non-scheduled works for individual adaptations when requested. This has allowed contractors to focus on the type of adaptations they are specifically qualified to do, ensuring the adaptation is delivered promptly by spreading the workload between several specialist contractors.



- 1.3 Since 2014 the service has also taken on the maintenance of existing adaptations to Council stock and the Handyperson service. The Handyperson Service has a criterion that has to be met, it also supports the avoidance of delayed hospital discharges, and supports vulnerable residents when they return home.
- 1.4 Re-procuring new framework agreements will ensure we comply with public procurement regulations and that we continue to receive value for money for these contracts, whilst ensuring that the Council continues to meet its statutory responsibilities under Disabled Facilities Grant (DFG) and Better Care Fund legislation.
- 1.5 We propose to offer each project to contractors on a rotational basis, to share the workload evenly, where a contractor is unable to meet the specific requirements or timescale required for the project, at that time the works will be offered to the next contractor on the Framework.

## **2.0 Options Considered**

- 2.1 One option considered was to analysis the possibility of utilising other public sector Frameworks. There are several Local Authority Frameworks in place for adaptations, however these are restricted to that Local Authority and not available to other public bodies. There are some adaptations frameworks available from purchasing consortiums (YPO), however, these are mainly material specific (i.e. specialist lifts, hoists etc) and not covering the works element required.
- 2.2 Therefore, there is no alternative but to carry out a full tendering process for disabled adaptation services to comply with The Public Contracts Regulations 2015.
- 2.3 Officers considered the option of setting up a Harrow Disabled Adaptation Framework that would attract the local and SME suppliers. Working with SME suppliers would allow for the service area to be agile in its response to increase demand.
- 2.4 The first lot would be a framework of up to 15 contractors to provide adaptations both to Council properties (funded by the HRA) and to other homes through DFG. The appointment of several specialist contractors to a framework will ensure we have the ability to deliver a consistently high-quality service to some of Harrow's most vulnerable residents, that takes their specific needs fully in to account and minimises delay at all times.
- 2.5 The second lot would be for up to 2 contractors to deliver the Handyperson service. Again, demand fluctuates with these elements of the service and customers' needs are frequently urgent. The framework will help to ensure we have the capacity to respond promptly to all requests.

- 2.6 The recommended option is to procure a framework under 2 lots that will offer prompt delivery with a good level of service. The lots will be split as follows:
- Lot 1 – Standard and Non-Standard Aids & Adaptations (up to 15 suppliers on the framework)
  - Lot 2 - Handyperson service (up to 2 suppliers on the framework).

### **3.0 Background**

- 3.1 The Home Improvement Agency (HIA) in Harrow delivers advice, support, information, advocacy, and practical help with designing and delivering adaptations and small jobs around the home to around 800 vulnerable, older or disabled people every year. Services are both cost-saving and preventive, aimed at prolonging older and disabled people's mobility, well-being, home safety, warmth and independence at home and preventing untimely or unnecessary admission to hospital or requiring care packages.
- 3.2 Adaptations vary considerably – both in terms of scale and specialism. The service is demand led, and most cases require an Occupational Therapist assessment before a suitable adaptation can be designed and referral rates vary from month to month. The practical help delivered can range from relatively small jobs such as installing a ramp to considering building an extension to house living facilities for the disabled person. All referrals need a prompt response, as the applicant will need the adaptation to assist with daily living, but some are particularly urgent because the customer is at risk, awaiting discharge from hospital and/or the Council is incurring high costs providing care etc. that can be reduced or eliminated once the adaptation is completed.
- 3.3 The Handyperson service provides much needed support that can help residents retain their health and independence and is often linked to the wider work of the HIA in fast tracking hospital discharges and undertaking repairs in the homes of vulnerable people to enable them to remain safe in their homes.
- 3.4 It is the intention to procure a framework with 2 Lots. Lot 1 will have up to 15 contractors to provide adaptations both to Council properties (funded by the HRA) and to other homes through DFG. The appointment of several specialist contractors to a framework will ensure we can deliver a consistently high-quality service to some of Harrow's most vulnerable residents, taking their specific needs fully into account and minimises delay at all times.
- 3.5 Lot 2 will have up to 2 contractors to deliver the Handyperson Service. Demand fluctuates with these elements of the service and customers' needs are frequently urgent. The service is also expanding to provide a commercial arm so the framework will help to ensure we have the capacity to respond promptly to all requests.

3.6 In addition to the reasons given above, we know that nationally DFG funding will increase each year until 24/25. Whilst it is not yet clear the proportion of the increased grant Harrow will see it is possible grant funding (currently £1.7 million p.a.) could double. We know that the reason for increasing the grant is to expand the Council's statutory duty to do more to contribute to the prevention agenda in partnership with Health. Harrow's service is working towards this, and several new initiatives are in the pipeline. However, with these anticipated changes we need to ensure our framework of contractors can provide the flexibility needed to develop new aspects of the service currently provided with no adverse impact on existing services.

#### **4.0 Performance Issues**

4.1 The new contractors will be managed effectively from mobilisation through each individual project, by the surveyors within the HIA. Performance statistics will be reviewed monthly and monitored. Effective and regular communication between the contractor and the Council whilst works are underway will ensure adaptations progress well and that the needs of the disabled person and members of the household are at the heart of all decisions.

#### **5.0 Environmental Implications**

5.1 It is the intention of the Asset Management Team that the delivery of all contracts will contribute to the Council's objectives around social, economic and environmental sustainability. We aim to do all we can to ensure that we support Harrow's economy by buying locally wherever practical and maximise opportunities for local people in employment and training. The contract specification will ensure that tenders provide detailed information about their contribution to the environment and sustainability and by looking for a framework of contractors we hope to procure small, local contractors who will be better placed to employ a local workforce.

#### **6.0 Risk Management Implications**

6.1 The delivery of the adaptations service is not a specific risk on the departmental risk register. There is also no separate risk register in place for either the procurement exercise or the on-going delivery of the service although one will be developed as the project progresses

6.2 In addition risks are identified and monitored for each individual project undertaken within the service. The contractors are responsible for completing a risk assessment.

#### **7.0 Risk Management Implications**

Risks included on corporate or directorate risk register? **Yes**

Separate risk register in place? **No**

The relevant risks contained in the register are attached/summarised below.

**Yes**

The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
The procurement process is not properly undertaken in compliance with Public Procurement Regulations and the Council's Contract Procedure Rules and Financial Regulations	<ul style="list-style-type: none"> <li>▪ Acceptance of the recommendation in this report will fully mitigate this risk</li> </ul>	Green
The current contracts that are due to expire will not be renewed and therefore if we do not seek cabinet approval to procure, we will be unable to provide a statutory service beyond May 2023.	<ul style="list-style-type: none"> <li>▪ Acceptance of the recommendation in this report will fully mitigate this risk</li> </ul>	Green
If we are unable to procure there is a risk to service delivery and loss of the DFG budget from the BCF.	<ul style="list-style-type: none"> <li>▪ Acceptance of the report's recommendation will fully mitigate this risk</li> </ul>	Green
The contract is due to end and if we do not procure, we are at risk of losing the current contractors who are experienced local contractor who offer a reliable and efficient service	<ul style="list-style-type: none"> <li>▪ Acceptance of the report's recommendation will fully mitigate this risk</li> </ul>	Green
The risk of not procuring may result in complaints, increase in hospital admissions, need for care packages, and restricted the ability to maintain independence in their own home.	<ul style="list-style-type: none"> <li>▪ Acceptance of the report's recommendation will fully mitigate this risk</li> </ul>	Green
The procurement arrangements for the two framework contracts and the Handyman service do not	<ul style="list-style-type: none"> <li>▪ Robust tender process to be undertaken for the contracts further to Contract Procedure Rules</li> </ul>	Amber

Risk Description	Mitigations	RAG Status
represent or deliver value for money for the Council	<ul style="list-style-type: none"> <li>▪ Current market conditions may result in a limited number of suppliers tendering</li> </ul>	
Material shortages and cost and delivery issues increase the cost of individual schemes	<ul style="list-style-type: none"> <li>▪ We will secure cost assurance from contractors and ensure schemes are turned around efficiently to avoid any delays which could aggravate inflation pressures</li> </ul>	Amber
Arrangements for contract management are not adequate or effective leading to poor quality work and delays on the contract	<ul style="list-style-type: none"> <li>▪ Ensure that contract is adequately resourced-internally and also quality assured</li> </ul>	Green
The framework of contractors procured is not sufficiently flexible to respond urgently to need/demand/ and to develop new aspects of the service currently provided	<ul style="list-style-type: none"> <li>▪ By allowing a Lot of up to 15 contractors we will be in a position to ensure work can be cascaded across suppliers based on volume. This should ensure the degree of flexibility we need.</li> </ul>	Green

## 8.0 Procurement Implications

- 8.1 The Council can compliantly extend the existing Framework for 5 months from the 20<sup>th</sup> May 2023 until the 19<sup>th</sup> October under Regulation 72 of the Public Contract Regulations 2015 – (1)(e)
- It does not render the framework agreement different from the one initially procured
  - The modification does not mean that unsuccessful bidders would have been chosen, a different tender would have been accepted or other bidders would have taken part
  - The modification does not change the economic balance of the contractor which it already did not have in the initial framework agreement e.g. no price changes
  - Modification simply extends for 5 months, and does not change the scope
  - The original contractor(s) are not being replaced as a result of the modification
- 8.2 During this extension period the Council will run a competitive procurement exercise in accordance with the Councils Contract Procedure Rules and the Public Contract Regulations 2015. It has been agreed that the OPEN Procedure will be followed to procure a framework with two Lots, Lot 1 – Standard and Nonstandard Aids

and Adaptations, Lot 2 – Handyman Services for the period of 4 years with no option to extend.

## **9.0 Legal Implications**

- 9.1 The Council has a statutory duty to undertake adaptations to the homes of disabled people.
- 9.2 Under Regulation 33 of The Public Contracts Regulations 2015, the Council can set up Framework Agreements for up to 4 years and must operate the Framework Agreement in accordance with Regulation 33.
- 9.3 Contracts can be called off from the Framework Agreement directly or by mini competition and the rules of the Framework Agreement make the intended call-off process clear.
- 9.4 HB Public Law will draft a Framework Agreement suitable for the type of works being procured and will advise (where required) on the procurement process in light of the Public Contracts Regulations 2015.

## **10.0 Financial Implications**

- 10.1 The Adaptations budgets for Disabled Facilities and Council adaptations are currently assumed at £1,721,553 and £645,000 from April 2023 and funded through a mixture of General fund grant funding and HRA capital.
- 10.2 Funding for the General Fund works are from the Disabled Facilities Grant element of the Better Care Fund which is passported through to Housing Services to support adaptations in the home. The funding allocation for 2022/23 is £1,721,553. It was confirmed in a government announcement at the beginning of December 2021 that funding for Disabled Facilities Grants will be sustained at the same level until at least 2024. However, it should be noted that the future allocation of capital grant is not guaranteed beyond 2024/25. The statutory duty placed on local authorities to award Disabled Facilities Grants determines that should the Government not allocate capital grant to the Council in the future, funding will need to be provided from the Council's own resources or through prudential borrowing.
- 10.3 Funds are set aside in the HRA business plan for the delivery of adaptations to the Council's housing stock.
- 10.4 The total contract value across the framework of £2,687,420 per annum is deliberately set higher than the existing budget provision and this provides the council some flexibility if there is a requirement to spend more.
- 10.5 A Framework will enable the Council to call-off contracts as required and does not provide a guarantee of the volume or value of work that the Contractor will be awarded. In the event that funding ceases, the

Council has no contractual obligations beyond any orders that have been called-off.

- 10.6 The impact of not spending on these critical adaptations is that vulnerable clients may not be able to remain in their homes thus losing independence and may therefore require residential care. Without adaptations residents may also require hospital admission or re-admission due to injury in the home, as well as exposing carers to the risk of injury and increasing the incidence of carer breakdown.

## **11.0 Equalities implications / Public Sector Equality Duty**

- 11.1 The procurement exercise is designed to deliver existing policies and strategies maintaining the current level of equality in service provision. The contract specification will be very clear on the equalities related duties on contractors, given the wide range of needs of our customers.
- 11.2 An initial Equality Impact Assessment has been prepared for the delivery of the Home Improvement Agency. This identified no need for a full assessment at this stage because it did not identify any potential for unlawful conduct or disproportionate impact. All opportunities to address diversity and the individual needs of applicants be addressed through the contract specification and ensure residents receive the same service regardless of but taking into account specific needs. We will address these in our tendering documents and processes. The assessment will be updated as the project moves forward.

## **12.0 Council Priorities**

- 12.1 Adaptations to the homes of disabled people, whether Council tenants or other residents provide opportunities to retain independence to many vulnerable residents.
- 12.2 Specifications for all contracts will ensure that the successful contractor is equipped to provide a high level of customer service to all our residents. In addition, every effort will be made to ensure that local businesses are encouraged to submit tenders and that added social value to support communities will be a part of the evaluation process.
- 12.3 Reducing negative impacts on health, hospital admissions, and length of stay.

## **Section 3 - Statutory Officer Clearance**

**Statutory Officer: Tasleem Kazmi**

Signed on behalf of the Chief Financial Officer

**Date: 24<sup>th</sup> February 2023**

**Statutory Officer: Mariam Khan**  
Signed on behalf of the Monitoring Officer  
**Date: 2<sup>nd</sup> March 2023**

**Chief Officer: Dipti Patel**  
Signed off by the Corporate Director  
**Date: 2<sup>nd</sup> March 2023**

**Head of Procurement: Lisa Taylor**  
Signed on behalf of the Head of Procurement  
**Date: 2<sup>nd</sup> March 2023**

**Head of Internal Audit: Neale Burns**  
Signed on behalf of the Head of Internal Audit  
**Date: 2<sup>nd</sup> March 2023**

**Has the Portfolio Holder(s) been consulted? Yes**

## **Mandatory Checks**

**Ward Councillors notified:** NO, as it impacts on all Wards

**EqIA carried out:** Yes, an overarching EQIA was undertaken for the programme Directorate Equality Task Group.

**EqIA cleared by:** (DETG) Chair

## **Section 4 - Contact Details and Background Papers**

**Contact:** Rukshan Kariy, Interim Head of Asset Management, Place Directorate, Rukshan.Kariy@harrow.gov.uk, tel. 07927 548861

**Background Papers:** None

**Call-in waived by the Chair of Overview and Scrutiny Committee - NO**





**Report for: Cabinet**

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<b>Date of Meeting:</b>	16 March 2023
<b>Subject:</b>	Review of the Social Housing Allocation Scheme
<b>Key Decision:</b>	Yes – the decision is significant in terms of its effects on communities living or working in an area of two or more wards of the Borough.
<b>Responsible Officer:</b>	Dipti Patel - Corporate Director Place David McNulty - Director of Housing
<b>Portfolio Holder:</b>	Councillor Mina Parmar - Portfolio Holder for Housing
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All Wards
<b>Enclosures:</b>	Amended Housing Allocation Scheme Equality Impact Assessment

## Section 1 – Summary and Recommendations

This report proposes a minor amendment to Harrow Council's Housing Allocation Scheme for social housing.

### Recommendations:

Cabinet is requested to:

- (1) Approve the amendment to section 4.5 of the Housing Allocation Scheme by inserting a new paragraph 4.5(i) as follows:

*“As of 01 April 2023, the Council will remove the 5-year residency requirement for non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow or another place in the UK.”*

**Reason (for recommendations):** To ensure Harrow Council's Housing Allocation Scheme's qualification criteria for joining the housing register is in compliance with the law and that it does not directly or indirectly discriminate any particular group of housing applicants seeking to join the housing register.

## Section 2 – Report

### Introductory paragraph

Every local housing authority must have an Allocation Scheme (“the Scheme”). This is a statutory requirement, namely under section 166A(1) of the Housing Act 1996 (as amended by the Homelessness Act 2002, the Localism Act 2011 and the Homelessness Reduction Act 2017) for determining priorities and to set out procedures to be followed in allocating housing accommodation.

Harrow Council has an Allocation Scheme that sets out how it allocates the rented social housing which is either owned by Harrow Council or which is owned by housing associations (registered providers) but to which Harrow Council has nomination rights.

The aim of the Scheme is to meet local priority housing need, make the best use of the very limited social housing stock in Harrow, and ensure that the applicants who are in the greatest assessed need for social housing wait as short a time as possible.

The Scheme sets out the eligibility criteria for joining the housing register and the policy for prioritising housing applications.

The scope of the Scheme does not include homelessness accommodation, such as Emergency Accommodation and Temporary Accommodation, which is dealt with in Harrow Council's Homelessness & Rough Sleeping Strategy.

The Scheme also excludes some specific types of social housing such as Extra Care Housing for Older People which is allocated in conjunction with Adult Social Care.

Harrow Council's Allocation Scheme was last approved by Cabinet on 21 January 2021. The Scheme should be kept under review. Although Harrow Council's Allocation Scheme states that it will review the Scheme every 5 years, it is best practice to review it regularly to ensure compliance with the law and effectiveness in meeting local housing need, and to reduce the risk of legal challenges.

This report proposes a minor amendment to the current Allocation Scheme. For the reasons explained in this report, Cabinet is requested to approve the proposed amendment.

It should be noted that a comprehensive review of the Scheme is planned for later this year, to allow sufficient time for the development of amendments and the necessary consultation.

## **Options considered**

The following options were considered:

**Option 1:** To not review and amend the Housing Allocation Scheme

This option is not recommended because the Council will not be complying with the law and could potentially be in breach of section 149 of the Equality Act 2010.

**Option 2:** To review and if considered necessary and appropriate, amend relevant part(s) of the current Housing Allocation Scheme.

This option is recommended as it complies with the law.

## **Proposed amendment to the Housing Allocation Scheme**

The need to review the Allocation Scheme and proposed amendment came about following a judicial review claim against the Council in which it questioned whether the 5-year residence criteria should apply to non-UK nationals with refugee status in the UK who are eligible and would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence of their choice in Harrow or another place in the UK.

Non-UK nationals with refugee status are different to asylum seekers, in that an asylum seeker is someone who has arrived in a country and asked for asylum. Until they receive a decision as to whether they are a refugee, they are known as an asylum seeker. In the UK, this means they do not have the

same rights as a refugee, or a British citizen would. As such, those with refugee status will usually be eligible for housing assistance and have recourse to public funds whereas asylum seekers do not have such rights pending determination of their asylum application to the Home Office.

Having reviewed the Scheme, it has been determined that it is right that non-UK nationals with refugee status in the UK should be exempted from the need to show local connection, in same way as those who have experienced domestic abuse, as recently arrived refugees or those who were in Home Office asylum accommodation since arriving in the UK will not be able to demonstrate a local connection to Harrow. Duties under the Equality Act 2010 means that the Council must treat such applicants in same way as other groups for whom local connection to Harrow is not required or is unreasonable requirement.

For this reason, it is proposed that the Council should remove the 5-year residency requirement for non-UK nationals with refugee status in the UK from the Scheme. This approach will be in line with that of other local housing authorities and would have a positive impact on the small number of housing applicants, namely applicants who are non-UK nationals with refugee status in the UK.

For the purposes of this report and in order to comply with the law, it is proposed that a new paragraph, namely paragraph 4.5(i) is inserted in section 4.5 of the current Allocation Scheme.

The new paragraph 4.5(i) will read as follows:

- (i) *As of 01 April 2023, the Council will remove the 5-year residency requirement for non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow or another place in the UK.*

### **Ward Councillors' comments**

The Portfolio Holder for Housing has been consulted. Limited consultation has been carried out within the timescale set by the Order.

### **Risk Management Implications**

Risks included on corporate or directorate risk register? **No**

Separate risk register in place? **No**

The relevant risks contained in the register are attached/summarised below.  
**n/a**

The following key risks should be taken into account when agreeing the recommendations in this report:

<b>Risk Description</b>	<b>Mitigations</b>	<b>RAG Status</b>
Statutory Duties: The Council does not review the Allocation Scheme and make necessary amendments then this could potentially be a breach of statutory duties.	Reviewing the Allocation Scheme and obtaining approval from Cabinet to amend the current Allocation Scheme will ensure the Council is complying with its statutory duties.	Green
Risk of Legal Challenge: There is a risk of future legal challenge(s) against the Council on grounds that it's Allocation Scheme is in breach of statutory duties and/or it directly or indirectly discriminates certain groups of housing applicant.	Reviewing the Allocation Scheme and Seeking approval from Cabinet and amending the Allocation Scheme will ensure the Council is complying with its statutory duties and this will reduce the risk of legal challenges in the future.	Green
The Council fails to amend the Allocation Scheme and does not make the necessary changes to its decision-making, policies and day-to-day practice on housing allocations.	Reviewing the Allocation Scheme and securing, approval from Cabinet to make the necessary amendments, and briefing housing staff will ensure the Council is complying with its statutory duties and not unfavourably treating a group of housing applicants.	Green

## Procurement Implications

There are no direct procurement implications resulting from the recommendation in this report. If any procurement is required, it will be conducted compliantly in line with the Contract Procedure Rules.

## Legal Implications

Section 166A(1) of the Housing Act 1996 (as amended by the Homelessness Act 2002, the Localism Act 2011 and the Homelessness Reduction Act 2017) requires that every local housing authority must have a Housing Allocation Scheme ("the Scheme"). Its purpose is to determine priorities between qualifying persons in allocating housing and to set out the procedures to be followed.

The allocation of housing by local housing authorities is regulated by Part VI of the Housing Act 1996 ("the 1996 Act"). Section 159(1) of the 1996 Act

requires that local housing authorities must comply with the provisions of Part VI when allocating housing accommodation. However, subject to this compliance, authorities may otherwise allocate housing in any manner they consider appropriate (see section 159(7) of the 1996 Act).

The 1996 Act also requires local housing authorities to give reasonable preference in their Allocations Scheme to people with high levels of assessed housing need. The Scheme may be framed to give additional preference to particular descriptions of people (see section 166A(5) of the 1996 Act). However, a local housing authority must not allocate housing accommodation except in accordance with its allocation Scheme (see section 166A(1) of the 1996 Act).

As a result of changes made by the Localism Act 2011, with effect from 18 June 2012, local housing authorities have been able to decide who “qualifies” for an allocation. Accommodation can therefore only be allocated to someone who qualifies under those local criteria (see section 160ZA(6) of the 1996 Act) and local housing authorities can largely determine who qualifies (see section 160ZA(7) of the 1996 Act).

The Secretary of State does however have the power to prescribe classes of persons who are, or are not, to be treated as qualifying persons (see section 160ZA(8) of the 1996 Act).

In formulating or amending its Scheme, a local housing authority must have regard to its current homelessness strategy under section 1 of the Homelessness Act 2002.

It is best practice to review the Scheme regularly (i.e. every few years) to ensure compliance with the law and good practice and that the Scheme is addressing housing need effectively. Where changes are to be made to the Scheme, it is a requirement to consult with those affected by the changes including Registered Providers.

Article 13 of the Council’s Constitution defines a ‘key decision’, which includes a decision likely to be significant in terms of its effects on communities living or working in an area of two or more wards of the Borough. Part 3A of the Constitution states that the Cabinet is responsible for all key decisions.

Following the judicial review case, the Council carried out a review of its Allocation Scheme and determined that it would be right that refugees who are eligible for housing assistance are exempted from the need to show local connection, in same way as those who have experienced domestic abuse, as recently arrived refugees will be unable to demonstrate a local connection anywhere in UK.

Section 149 of the Equality Act 2010 requires the Council, as a public body, to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act. The removal of the 5-year residency requirement for non-UK nationals with refugee status in the UK would ensure compliance with section 149 duties as the Council would put non-UK nationals with refugee status in the UK in the same position as other groups for whom

local connection is an unreasonable requirement and/or re unable to meet this requirement. The removal of the 5-year residency requirement will eliminate any potential claims of direct or indirect discrimination.

## **Financial Implications**

The Housing Allocation Scheme is a statutory requirement of Part VI of the Housing Act 1996 as amended by the Homelessness Act 2002 and the Localism Act 2011.

The Housing Allocation Scheme sets out how the Council allocates the rented social housing which is either owned by Harrow Council in the Housing Revenue Account (HRA) or which is owned by housing associations (registered providers) but to which Harrow Council has nomination rights.

The aim of the Housing Allocation Scheme is to meet local priority housing need, make the best use of the very limited social housing stock in Harrow, and to reduce the time which properties remain vacant whilst suitable applicants are identified.

An effective approach to allocations can minimise void times and therefore void loss to the HRA. It can also minimise the amount of time that homeless households who have applied for social housing spend in homelessness accommodation, such as emergency or temporary accommodation, which impacts on the General Fund (GF).

The Housing Allocation Scheme should be kept under review. It is best practice to review it regularly to ensure compliance with the law and effectiveness in meeting local housing need, and to reduce the risk of legal challenge which has financial implications for the Council. The amendment to the scheme has minimal financial implications.

## **Equalities implications / Public Sector Equality Duty**

Section 149 of the Equality Act 2010 outlines the provisions of the Public Sector Equality Duty which requires Public Bodies to have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant characteristic and persons who do not share it.

The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership.

Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- (a) Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic.
- (b) Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
- (c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

When making policy decisions, the Council must therefore take account of the public sector equality duty and in particular any potential impact on protected groups.

Accordingly, an Equality Impact Assessment has been carried out in respect of the proposed amendment. The proposed amendment will have a positive impact on social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow.

As non-UK national with refugee status in the UK have the protected characteristic of race within the meaning of section 9 Equality Act 2010, the proposed change will have a positive impact on applicants with this protected characteristic.

## **Council Priorities**

The decision sought delivers the priority 'A place where those in need are supported' because the aim of the Housing Allocation Scheme is to meet local priority housing need, make the best use of the very limited social housing stock in Harrow, and ensure that that the applicants who are in the greatest assessed need for social housing wait as short a time as possible.

## **Section 3 - Statutory Officer Clearance**

**Statutory Officer: Tasleem Kazmi**

Signed on behalf of the Chief Financial Officer

**Date: 02/03/2023**

**Statutory Officer: Kaniz Ali**

Signed on behalf of the Monitoring Officer

**Date: 06/03/2023**



**Chief Officer: Dipti Patel**  
Signed by the Corporate Director  
**Date: 2<sup>nd</sup> March 2023**

**Head of Procurement: Nimesh Mehta**  
Signed by the Head of Procurement  
**Date: 02/03/2023**

**Head of Internal Audit: Neale Burns**  
Signed on behalf of the Head of Internal Audit  
**Date: 3<sup>rd</sup> March 2023**

**Has the Portfolio Holder(s) been consulted? Yes**

## **Mandatory Checks**

**Ward Councillors notified: NO, as it impacts on all Wards**

**EqIA carried out: YES**

**EqIA cleared by: Jennifer Rock, EDI Team**

## **Section 4 - Contact Details and Background Papers**

**Contact:** Meghan Zinkewich-Peotti, Housing Strategy Project Manager  
Tel. 07395840490, [meghan.zinkewich-peotti@harrow.gov.uk](mailto:meghan.zinkewich-peotti@harrow.gov.uk)

### **Background Papers:**

- [Current Housing Allocation Scheme approved on 21 January 2021](#)

**Call-in waived by the Chair of Overview and Scrutiny Committee - NO**

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# **LONDON BOROUGH OF HARROW HOUSING ALLOCATION SCHEME**

**As required by Part VI of the Housing Act 1996 as amended by  
the Homelessness Act 2002, the Localism Act 2011 and the  
Homelessness Reduction Act 2017**

21 January 2021 Cabinet approved the scheme for implementation from 1 April 2021.

# Housing Allocation Scheme

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# 1. Purpose of the scheme document

## 1.1. Background

Every council is required by law to have a written scheme setting out how it will allocate the rented housing which it owns and to which it has nomination rights. This new scheme, which was amended in December 2020, replaces previous London Borough of Harrow Housing Allocation Schemes or Lettings and Transfers Schemes.

## 1.2. Legal framework

Harrow Council's allocation scheme sits within a framework which includes the Housing Act 1996 (as amended by the Homelessness Act 2002 and the Localism Act 2011), the Homelessness Reduction Act 2017 and regulations issued by government relating to allocations. The sections below explain how the main laws set the context for the allocation scheme.

### 1.2.1. Localism

- 1.2.1.1. Under the Localism Act 2011, local authorities can identify groups who will not qualify for an allocation of social housing, by taking into account:
- a household's ability to meet their own housing costs.
  - any behavior that affects a person's ability to be a suitable tenant
  - local connection between the household and the local authority.

This is dealt with in more detail in section 7 on Qualification and Eligibility.

### 1.2.2. Reasonable preference

- 1.2.2.1. The Council must give 'reasonable preference' to the following groups when it decides how to allocate housing:
- households living in overcrowded or unsanitary conditions,
  - those who need to move due to a medical condition or disability,
  - those who need to move for health related or welfare reasons, including care leavers and people with high level support needs,
  - those who need to move due to hardship.
  - those who are homeless or at risk of homelessness.
- 1.2.2.2. We can also give additional preference to households in one of the reasonable preference groups listed above. By law, we must give additional priority to applicants who are current or previous members of the armed forces and who are in housing need.

## 1.3. Housing Priority

This document explains the options for people looking for a home in the London Borough of Harrow and sets out which groups of people are priorities for an allocation of the public rented housing<sup>1</sup> made available by Harrow Council and

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<sup>1</sup>The term public rented housing is used throughout this document to mean homes let on any kind of secure, assured, fixed term or flexible tenancy by a council or housing association or  
London Borough of Harrow      Lettings\_Scheme\_2021

housing associations in our area<sup>2</sup>.

#### 1.4. **Types of tenancy**

The scheme applies to the way the council will allocate all public rented housing. It covers properties let at secure, assured and “affordable” rents.

#### 1.5. **Procedures for letting public rented housing**

It explains the detailed procedures that Harrow will follow in letting council and housing association<sup>3</sup> rented homes both to existing tenants looking to transfer and to new home seekers.

#### 1.6. **Consultation**

Appendix 1 sets out the process the council went through in consulting on and drawing up this scheme document.

#### 1.7. **Changing the scheme**

We will review the scheme at least every 5 years.

## 2. **Housing advice**

### 2.1. **Our service**

The council's housing service can give information to anyone who is looking for a home in the borough, whatever their circumstances. We can also offer advice to Harrow residents on finding accommodation outside Harrow, in places where homes are more plentiful, and rents and mortgage costs are lower. Some of these areas are within reasonable travelling distance of Harrow for work or study.

### 2.2. **Contact details**

We provide housing advice online, on the housing options pages of Locata at [www.locata.org.uk/harrow](http://www.locata.org.uk/harrow), by e-mail at [locatahelp@harrow.gov.uk](mailto:locatahelp@harrow.gov.uk), by telephone, and in person, by appointment only at Harrow Civic Centre. Go to [www.harrow.gov.uk](http://www.harrow.gov.uk) to find up to date details about advice lines, appointments and our advice service.

### 2.3. **Housing assistance**

Large numbers of people seek low-rent public and private housing in Harrow, but only small numbers of homes become available to the council each year. We regret, therefore, that we are only able to offer help with accommodation to a very

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other publicly funded housing provider. The more usual term of “social housing” is avoided in order to make it clear that the policy does not cover shared ownership or “intermediate” rented housing but does cover properties let at “target”, “social” and “affordable” rents.

<sup>2</sup>The council must have an allocations scheme by law and must take into account any relevant allocations codes of guidance, the council's homelessness strategy and tenancy strategy and the London Mayor's housing strategy. In addition, our scheme is framed so as to be compatible with the council's equality duties.

<sup>3</sup>In this document the term housing association is used in preference to the term “registered provider” because our customers better understand the meaning of that term. Should any registered providers that are not housing associations start doing business in Harrow this scheme should be read as also applying to them.

limited number of households. This help can include, depending on individual circumstances, enabling people to stay where they are living now or facilitating a move to a private rented or low-cost home ownership home. For many people a move to public rented housing in Harrow is unlikely to be a realistic and achievable housing option.

### **3. Housing in Harrow**

#### **3.1. The housing market in Harrow**

Harrow is a very popular place to live. There are many different types of homes in the borough, from homes to buy on the open market, through low-cost home ownership schemes run by housing associations, to private, council-owned and housing association-owned rented housing. The last two types, referred to in this scheme as “public rented housing”, make up only around 10% of Harrow’s property market, making it one of the smallest public rented sectors of any London borough.

#### **3.2. Specialist housing**

Some homes within Harrow are designed for particular groups. These include rented and leasehold sheltered and retirement housing for older people, and schemes with on-site support for particularly vulnerable people with a range of support needs.

#### **3.3. New rented social housing**

The council works successfully with housing associations to increase the supply of affordable rented properties in Harrow, but the numbers of such units (averaging around 45 per year over the last 3 years) is not enough to keep pace with the demand, particularly as over 20 council homes are lost on average each year as a result of the right to buy legislation. Access to such homes is through nomination via “Locata” (see section 5 below). The Council also has an ambitious development programme and a major regeneration programme is underway at Grange Farm Estate.

#### **3.4. Housing Association allocations**

No housing associations in Harrow (except a few that specialise in schemes for older people) manage their own waiting lists, other than for their own tenants wishing to transfer. This means that most people should make only one application for public rented housing in Harrow, via [www.locata.org.uk/harrow](http://www.locata.org.uk/harrow).

#### **3.5. High demand and low supply**

Many people wish to move to council or housing association rented homes because these offer below-market rents and because people perceive them as giving greater security of tenure than homes rented by landlords in the private sector. However, the supply of this type of housing is very limited. Each year we expect to re-house around 250 households into public rented housing. Half of the vacancies are studio and 1- bedroom flats, normally suitable only for single people and childless couples. Half of these small units are reserved for older people. Yet at any one time we have over 2,000 households who have registered their interest in taking such a tenancy, and over 850 new households applying to register each



year. The overwhelming majority of applicants with an acknowledged housing need are families, for whom most of the available accommodation is unsuitable.

### 3.6. **Low supply of larger, family homes**

The demand to supply ratio is worse for family homes than for 0-1 bedroom properties and, despite using some suitable 3 bedroom properties with 2 reception rooms as 4 bed properties, it is by far the highest for 4 bedroom properties. The larger the number of bedrooms required by a family, the longer are the waiting times and the lower is the likelihood of ever receiving an offer.

### 3.7. **Type of housing available**

Sometimes people who apply for housing with Harrow have an unrealistic expectation of being offered a large house or bungalow with a garden whereas, in reality, most of our homes are flats rather than houses. Very few ground floor flats are available. The few bungalows in our stock are either very small or are let to people with mobility needs. Most of our properties are on small to medium sized housing estates, and there are large parts of the borough where we have no or very few properties.

### 3.8. **Condition of the available housing**

Council and housing association rented properties are unfurnished (with the odd exception) and are usually re-let undecorated. Only residents in sheltered schemes in Harrow can expect their homes to be redecorated by the council or housing association landlord, and the terms of tenancy agreements require tenants to keep their homes in good decorative order.

### 3.9. **Other housing options**

Most people who apply for housing with Harrow will never be offered a public tenancy, however long they wait. When the prospect of immediate re-housing is unrealistic, we advise people to seriously consider other options, especially private renting and/ or moving away from West London.

## 4. **Aims of the Scheme**

### 4.1. **Overall aims**

The Council aims ensure that public rented housing goes to those with the most need, as defined by local standards, while reducing the budgetary impact of homelessness. The housing allocations scheme is one of a group of policies that sits beneath Harrow's overarching Housing Strategy. The allocation scheme supports the strategy's key objectives, specifically to 'promote realistic housing options for people who need to move', 'prioritise new homes for people living or working in Harrow' and 'meet the needs of older and vulnerable residents'. A number of other factors have also been taken into account in order to produce a balanced and fair allocation policy and process.

### 4.2. **Supporting vulnerable people**

The scheme reflects the Council's ambition to support and protect people who are most in need. It aims to give the highest priority to those who are less able to

provide for their own housing needs than most of the population and therefore most in need of the council's help when their accommodation is unsuitable for their needs. We define unsuitable housing as accommodation that is:

- adversely affecting in a major way someone's medical condition or disability, or
- significantly detrimental to their welfare (for example there is significant risk of harm or risk to a vulnerable person's independence), or
- severely overcrowded or severely unsanitary.

The fact that a landlord is a private person charging a rent that is higher than a public sector rent does not make a home unsuitable.

#### 4.3. **Tackling homelessness**

A person is threatened with homelessness if s/he has applied for Part 7 assistance and is likely to become homeless within 56 days or, if occupying accommodation under an assured shorthold tenancy, has been served with a valid notice under section 21 of the Housing Act 1988 expiring within 56 days.

The Council's first priority, pursuant to its duties and powers under the Homelessness Reduction Act 2017, is to prevent people from becoming homeless by helping them to remain in their current accommodation or facilitate a move to alternative private rented accommodation. Where the Council believes that the potential applicant/s are able to access market housing i.e. private rented or low-cost home ownership, the Council will provide advice and assistance as necessary.

A relevant Part 7 duty means for these purposes an accommodation duty owed to Part 7 applicant who is eligible for assistance and either (i) has a priority need and has become homeless intentionally, (ii) has a priority need and has not become homeless intentionally, or (iii) does not have a priority need, has not become homeless intentionally and the Council has elected to secure that accommodation becomes available for his occupation.

In accordance with the changes brought in by the Localism Act 2011 we no longer make the presumption that most applicants owed the main homelessness duty will have the duty ended with an offer of public rented housing. Hence there are distinctions made in the scheme between homeless applicants who applied before and after 9<sup>th</sup> November 2012<sup>4</sup>. The scheme gives those who are homeless, as required by law, "reasonable preference", but homeless people will only receive a high level of priority for an allocation of public rented housing if their household is vulnerable for reasons other than homelessness, or if it is needed in the council's interest in order to manage the costs of homelessness.

#### 4.4. **Promoting informed choice**

Under the scheme housing applicants become "members" of the West London choice-based lettings scheme, called Locata, and actively search for a home<sup>5</sup>. By

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<sup>4</sup> Because the latter do not have to agree to an offer of private sector housing aimed at ending the full duty.

<sup>5</sup> The choice-based lettings banding system replaced, in 2002, a "points" system, under which council officers decided which applicant would be offered which property.

letting and nominating to our properties in a transparent, applicant-friendly, and fair way we aim to empower applicants and promote equal treatment<sup>6</sup>.

#### 4.5. **Changes from the previous allocations scheme**

Following a review of the scheme, it was identified that a high number of applicants either refused an offer of a tenancy or did not bid for available suitable vacancies. The aim of Harrow's housing allocation scheme is to meet local priority housing needs, make the best use of Harrow's very limited social housing stock and be fairer to all by ensuring that residents who are in the most need of housing, wait as short a time as possible for an allocation of public rented housing. In order to retain the principle of choice, ensure that those in most need of housing wait as short a time as possible and minimize loss of rental income due to void properties, the significant change in this revised scheme is to implement more robustly the penalties that already exists in the allocation scheme to address:

- (a) Refusals – where an applicant has refused one or more reasonable offers or have not turned up to a viewing when invited, they will be downgraded to a lower priority band. The circumstances are set in the chart in appendix 16.
- (b) Not bidding – where an applicant who urgently need to move, for example where a band A+ and A applicant has not been bidding, they may receive a direct offer of accommodation. The chart in appendix 16 outlines which groups of applicants we may make direct offers.

In addition to these changes, there are 6 minor changes to the Scheme which are made to address changes in law and other issues including:

- (c) Introducing a separate banding for sheltered Housing for Older People to make it easier to access sheltered housing. This change will not disadvantage current applicants as those with an urgent need to move have already been awarded additional priority.
- (d) Allowing current temporary occupants to be offered a secure tenancy of the property they occupy when it is converted from temporary use to a council property. This will be subject to suitability of the property and there being no recent tenancy issues such as arrears or ASB.
- (e) Implementing a Local Lettings Plan setting out how properties will be allocated in exceptional circumstances to meet area specific issues, for a specific block or estate. The purpose is to have a planned approach to the letting of high density/high rise schemes to ensure sustainable mixed and balanced communities. The Divisional Director for Housing following consultation with the Portfolio Holder for Housing will authorise Local Lettings Plans for council housing stock under a delegated authority.
- (f) Ending allocations to designated people aged 50 years and over. This is because some properties were previously designated for people aged 50

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<sup>6</sup>Although the council is committed to letting its housing applicants express a preference as to the type of property and the area in which they would like to live, applicants need to be aware that our ability to satisfy their expressed preference may be severely limited. Hence in appendix 15 we spell out the circumstances in which we will make direct offers, and in which we will penalise applicants for refusals of suitable offers.

years and over. Over time and through the Right to Buy the age mix has changed and the blocks are no longer occupied only by over 50s. Therefore, there is no reason to continue to prioritise this group.

- (g) Removing the local residence criteria for applicants:
  - i) moving because of domestic abuse
  - ii) who are travellers
- (h) Correcting the current anomaly in the Housing Allocation Scheme where applicants accepted as homeless by another council and Harrow is satisfied that the Council that owes the duty is unable to provide accommodation are given higher priority than those accepted as homeless by Harrow Council. All homeless applicants will be awarded Band C whether accepted by another Council or Harrow Council.
- (i) As of 01 April 2023, the council will remove the local residency requirement for non-UK national with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow or another place in the UK.

#### 4.6. Equality and Fairness

**Equality duties:** the scheme is framed so as to give effect to the council's Equality Act 2010 responsibility to eliminate unlawful discrimination on grounds of age, disability, race, religion, sex, sexual orientation, gender reassignment, marriage/ civil partnership, pregnancy/ maternity. Regular monitoring and adjustment of the scheme will take place to give effect to this duty. As far as possible it also aims to advance equality of opportunity between people from different groups.

**Treating tenants and homeseekers equally:** The Localism Act 2011 allows the council to allocate properties to council tenants outside the allocation scheme. Harrow, however, prefers to keep most lettings within the scheme to promote transparency, clarity and equality. Appendix 13 lists cases that do not qualify as "lettings" and hence do not need to be covered by this allocation scheme.

#### 4.7. Facilitating Inter-borough mobility

(a) Within West London Locata Harrow, like the other partners, makes a small percentage of vacancies available to members living in any of the six partner local authority areas.

(b) The Mayor's Office of the Greater London Authority runs a scheme called "housingmoves" which facilitates moves by council and housing association tenants to other parts of London. Harrow contributes a small percentage of its vacancies to this scheme.

**Note:** Both mobility schemes have built-in mechanisms aimed at ensuring that the number of moves into Harrow by non-Harrow residents is matched by the number of lettings by partner boroughs to Harrow residents who wish to move out of the

borough.

#### 4.8. **Making best use of council resources**

In order to manage the costs of homelessness and balance the competing needs of different groups of people in housing need, the council may from time to time reserve or earmark properties for particular categories of applicant and may set targets for percentages of allocations to different groups. Targets are approved annually following consultation with the Portfolio Holder for Housing. In addition, the allocation scheme takes into account:

- housing need and supply
- statutory and contractual obligations
- the cost to the council of emergency and temporary accommodation other financial considerations
- the council's responsibility as a landlord
- the council's responsibility to co-operate with the police and other statutory agencies to reduce risk to citizens associated with, for example, ex-offenders, witness protection, and gang culture.
- making the best use of council stock.
- the housing situation within the borough.

#### 4.9. **Other corporate policy objectives**

In addition, the scheme contributes to many other strategic goals of the council and the housing service, shown in Appendix 2.

## 5. **West London Locata**

#### 5.1. **The central lettings agency**

The central lettings agency, Locata Housing Services (LHS) Ltd., is a company set up by west London local authorities and housing associations, including Harrow Council. In addition to running the west London scheme, LHS works with many housing authorities up and down the country. It provides the computer program that enables Harrow and the other partners to advertise property vacancies, register and verify our housing applicants and match properties to the people who have expressed an interest in them. It also provides our on-line housing information service, the targeted housing options website at [www.locata.org.uk/harrow](http://www.locata.org.uk/harrow).

#### 5.2. **West London Locata**

The partner boroughs and housing associations which advertise properties in the west London scheme as at December 2020 are:

London Borough of Brent\*  
London Borough of Ealing\*  
London Borough of Harrow\*  
London Borough of Hillingdon\*  
A2 Dominion  
Catalyst Housing\*  
Hillside Housing Trust  
Inquilab Housing Association

London Borough of Harrow

Lettings\_Scheme\_2021

Network Homes  
Notting Hill Genesis\* (formerly Genesis and Notting Hill Housing)  
Octavia Housing  
Paradigm Housing\*  
Shepherds Bush Housing Association  
Westway Housing Association

\*indicates the member organisations that form and control Local Housing Services

- 5.3. **Eligibility of other Locata partners' members for Harrow properties** Harrow makes available a small number of its vacancies for cross-partner advertising and a small proportion of other partners' vacancies is available for Harrow members to bid for. The cross-partner scheme applies to lettings of Harrow public rented housing to the homeseekers and transfer applicants of all other organisations, including those that joined since 31/03/20 or may join the partnership in the future. Sections 14.2 and 20.7 explain how Harrow deals with bidders who are registered with other Locata partners.

## 6. How the scheme works

### 6.1 Priority banding

We assess those who apply for housing as belonging to one of five bands of housing need, from A+ (highest) to C- (lowest). Only applicants banded A+ to C- (initial preference) qualify for the housing register. Those disqualified, if they live in Harrow, can use the Locata website to access their targeted housing options. Priority within bands is on a date order basis, according to the date the member was placed into that band. The new scheme maintains the same basic format as the old, although there are significant changes to the definitions of who gets priority and which band they are placed in. Harrow residents who do not qualify for an allocation of public rented housing (see qualification rules in section 7 below) will be given a Locata ("LIN") number in order to be able to log in to the Locata website to search for other suitable housing solutions relevant to their particular circumstances. They cannot bid for public rented homes.

### 6.2. Property advertising

Vacant council and housing association properties are advertised on the West London Locata website ([www.locata.org.uk](http://www.locata.org.uk)) to people registered in bands A+, A, B, C and C-. We let between 80 and 90% of new and vacant council housing and housing association rented homes to which the council has nomination rights through this scheme. Circumstances in which direct offers may be made, sometimes bypassing the Locata process, are set out in section 23 below.

### 6.3. Expressing an interest – "bidding"

Members are able to express an interest ("bid") for up to three properties at any one time. The properties are let to bidders first by band then in waiting time order. Bids may be placed by housing staff on members' behalf, either at the member's request or in order to facilitate the making of a direct offer to a person in urgent need of re-housing (see section 23 below on the making of direct offers).

### 6.4. Feedback on let properties:

All properties let under this policy are listed on the Locata website. The personal feedback section for each Locata member shows each property they placed bids for, the number of bidders and the band and registration date of the successful bidder. There is also feedback on all properties let through Locata in the Freesheet Archive of the website ([www.locata.org.uk](http://www.locata.org.uk)). The feedback enables members to gauge the scarcity and popularity of different areas and property types, to be able to judge how long they might have to wait to be re-housed, and thus to exercise informed choice.

#### 6.5. **Ensuring fairness for different groups**

There are two main groups of people who apply for housing in Harrow:

- An overwhelming 85% of applicants are people who do not currently have a public sector tenancy, referred to as “homeseekers” (this includes homeless households).
- The second group, referred to as “transfers”, comprises permanent council and housing association tenants in the borough who decide to apply to the council rather than their own landlord for a move. Both kinds of transfer applicant together make up only 15% of registered Locata members.
- In addition, there is a very small number of applicants who do not fit into either group, including those from outside Harrow who are offered tenancies under an inter-borough mobility scheme (see section 4.8 above) or a reciprocal arrangement with the police or a social care service agency.

As explained in section 4.9 above, targets are set from time to time for the proportion of homes to be allocated to the two main groups, and regular monitoring takes place to ensure the targets are achieved, which is done, if necessary, by earmarking properties in the adverts for one group or the other.

#### 6.6. **Transitional relief arrangements**

We protect some categories of applicant who applied and were assessed under the pre-2013 priority categories and who no longer have priority under the scheme. If they had accrued a long waiting time in band C at the implementation date<sup>7</sup> they are still able to obtain public rented housing as band B applicants (the equivalent of the old band C) until they are either offered suitable permanent public rented housing, are residing in accommodation that is considered suitable for their household’s needs, or their circumstances change. The length of waiting time will vary with the size of property required, as shown in table 1 below, and will be calculated from, 22/10/2013, the date from which this change was previously implemented.

Staff assist protected applicants by advice and direct offers if this is necessary in order for them to be successful. The protection applies to:

- Those who are overcrowded by only 1-bedroom
- Those whose priority for overcrowding is based on the old Locata standard and does not count as overcrowding under the national bedroom standard

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<sup>7</sup> The protected waiting times are based on the assumption that half the lettings in the first year of the scheme are reserved for applicants protected by transitional relief.

- (subject to affordability where the family is benefit- dependent)
- Those whose priority for overcrowding includes family members aged 21 or over who do not need to live in the household either to receive or provide care and essential support
- Those whose medical or welfare priority to move is of a variable or comparatively mild or moderate nature.

No. of bedrooms needed	No. of yrs. wait to qualify for transitional relief
1-bedroom (non-sheltered)	2 or more
2-bedroom	5 or more
3-bedroom	7 or more
4 or more bedrooms	8 or more

#### 6.7. **Transitional relief for accepted homeless people**

Accepted homeless people in temporary accommodation and formerly accepted homeless people who accepted a qualifying offer of private rented sector housing were in band C under the pre-2013 scheme. Under the scheme many of them will remain in band C, i.e. those suitably housed.

However, in band C there are now 3 priority bands ahead of them rather than the former 2, resulting in longer waiting times. These applicants, if they need a 1 or 2 bed property and if they have a long waiting time in band C, will still be able to obtain public rented housing as band B applicants (the equivalent of the old band C) until they are either offered suitable permanent public rented housing, are residing in accommodation that is considered suitable for their household's needs, or their circumstances change and will be assisted by advice and direct offers if this is necessary in order to be successful.

No. of bedrooms needed	No. of yrs. wait to qualify for transitional relief
1-bedroom (non-sheltered)	2 or more
2-bedroom	5 or more

6.8. We have protected the band C priority of the affected homeless families from bed and breakfast who were offered council 1-bed flats on the basis that they could keep the priority for 2-bedroom accommodation they would have had if they had remained homeless.

6.9.



<b>Table 3 – Groups not entitled to transitional protection</b>			
<b>Group</b>	<b>Exceptions</b>	<b>Bands</b>	<b>Treatment</b>
Those with income or savings over the newly designated limits (appendix 10) for eligibility for an allocation of public rented housing	Discretionary hardship exceptions as referred to in appendix 10.	A, B and C	Applicants disqualified under the new scheme; transitional relief does not apply.
Those not currently resident in Harrow at the date of implementation of the new scheme	Those who qualify to apply as listed in section 7.4 below.	C and D	Applications will be closed; transitional relief does not apply.
Those who have not lived in Harrow for 5 years at the date of implementation of the new scheme	a. Those who qualify to apply as listed in section 7.4 below. b. Those who have been awaiting a 1-bedroom allocation for 2 or more years as listed in section 6.6 above	A, B, C and D	Applications disqualified; transitional relief does not apply.
Accepted Homeless applicants and formerly accepted homeless applicants who accepted a qualifying offer in the private rented sector who require family-sized accommodation (3 or more bedrooms).	Those who, on reassessment, qualify for band A*, A or B on grounds set out in the new scheme.	C	Applicants will remain in band C.

Accepted homeless applicants where the duty was accepted after 13 December 2012 and who have refused a reasonable offer of private sector housing since they approached Harrow for housing.	None	C	Applicants will remain in band C.
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## 7. Qualification and eligibility to register for housing with Harrow

### 7.1 How to make an application

Application for housing with Harrow Council is made using an on-line application form on the Locata website, at [www.locata.org.uk/harrow](http://www.locata.org.uk/harrow). The Locata system makes an initial automatic assessment of priority on the basis of the answers the applicant gives to the questions about their needs and current housing circumstances. Some types of application (e.g. where the lowest band applies) are automatically validated (i.e. made active) on the Locata system. Where necessary, officers in the housing assessment team check and confirm the assessment and validate the application. Those applying must give their consent for the information they provide to be shared with other relevant agencies as necessary to carry out an accurate assessment of their case and to ensure that any housing allocation is appropriate.

### 7.2. Validated applications

Only those applicants whose priority band is A+, A, B, C or C- (Initial preference) will be able to bid for homes on Locata. Those who are Harrow residents who are disqualified under section 7.5 below, although unable to bid, will have access to the other housing options signposted on the Locata website.

### 7.3 Assistance with making an application

The housing department will offer assistance to complete the form if the applicant is unable to use a computer and has no friend, relative or advocate helping them. An eligible person may be registered without an online application form in some limited circumstances, at the discretion of a team manager in the Housing Needs team.

### 7.4. Who can make an application

People aged eighteen or over<sup>8</sup> can register their housing need with the council if they are in one or more of the following groups (referred to, in line with the relevant legislation, as “qualifying persons”):

- living in Harrow.
- not living in Harrow but need to move because of risk of domestic abuse or people from the travelling community.
- homeless within the meaning of Part VII of the Housing Act 1996 or threatened with homelessness within 56 days and owed a prevention duty.
- homeless within the meaning of Part VII of the Housing Act 1996, and have been assisted by Harrow with out of borough temporary accommodation, as long as they continue to have a priority need.<sup>9</sup>

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<sup>8</sup> The housing department assists 16 and 17 year olds outside the choice based lettings scheme, in partnership with Children’s Services.

<sup>9</sup> priority need is defined in Part VII of the Housing Act 1996, as amended.

- homeless within the meaning of Part VII of the Housing Act 1996 and being assisted as “rough sleepers” who have had a previous residence in Harrow of at least 5 years.
- formerly accepted homeless applicants who took a qualifying offer of housing outside Harrow as long as they continue to have a priority need and providing they maintain their registration.
- homelessness duty has been accepted by another council and Harrow has agreed that the council that owes the duty is unable to provide suitable accommodation
- young people leaving care, referred to Housing by Harrow Council Children’s Services under their quota arrangements, whether or not they currently live in Harrow.
- due to be discharged within 1 month from hospital or prison and the last settled address was in the borough.
- serving and former members<sup>10</sup> of the Armed Forces and the Reserved Forces whether or not they currently live in Harrow.
- secure, introductory or flexible tenants of Harrow Council, even if housed outside the borough.
- Public rented sector tenants accepted for re-housing by Harrow as a reciprocal arrangement with another borough or under an agreed mobility scheme such as the Pan London Housing Reciprocal scheme, the “safe and sound” scheme, the national witness protection scheme and any other such scheme which Harrow joins subsequent to the start date of this scheme (see section 14 below for more information)<sup>11</sup>.
- Exceptionally, people whom the council (on the decision of a team leader in the housing needs team) considers should be qualifying persons, on a case-by-case basis, because of exceptional circumstances or special needs or on hardship grounds; this may include older people needing to move to Harrow to be nearer to relatives who provide care and support or people who need to access specialised medical treatment or take up a particular employment, education or training opportunity, or victims of domestic violence who need to make a fresh start in a borough with which they do not have a local connection, where other types of housing would not meet their housing need.

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<sup>10</sup> former members” are defined as those who left the armed forces within 5 years of the date they make a housing application.

<sup>11</sup> not including the pan London tenant mobility scheme, which has its own application process.

## 7.5. Exclusions

People will not qualify for priority for public rented housing in Harrow if:-

- (1) They have been accepted homeless by a borough other than Harrow<sup>12</sup> and that borough is able to provide suitable housing, *or*
- (2) they are not currently resident within the borough (unless they are in one of the categories of non-residents who are listed as qualifying persons in section 7.4 above), *or*
- (3) they are ineligible under the Housing Act 1996, S. 160A (including some people from abroad who are ineligible for an allocation of housing – appendix 3 gives more detail about this group), *or*
- (4) any member of the qualifying person's household: -
  - (a) has been guilty of serious anti-social behaviour and a possession order is being sought or has been obtained, *or*
  - (b) (in the case of a homeseeker) has been guilty of behaviour which the council considers would entitle it, if they had been a secure tenant, to obtain a Possession Order under S.84 of the Housing Act 1985 on any ground mentioned in Part 1 of Schedule 2 to that Act, other than rent arrears<sup>13</sup>, *or*
  - (c) has been convicted of, or had legal action taken against them, for physical or verbal abuse of council staff or its contractors or housing association partners, *or*
  - (d) knowingly or intentionally provides false or misleading information to Harrow Council (including documentation), fails to disclose relevant information that they are under a legal duty to disclose or withholds information that has been reasonably requested in relation to their housing application *or*<sup>14</sup>,
  - (e) has paid money to obtain a tenancy with either a council or housing association *or*,
  - (f) has been convicted of a fraud offence in relation to Harrow Council or a housing matter; or there is sufficient evidence of an admission of fraud, or an alternative sanction to prosecution is/has been accepted by the applicant in relation to the provision of public sector/local authority
  - (g) services

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<sup>12</sup> Those accepted homeless by another borough may register for housing if they fulfill the 5 year Harrow residence criterion but will have low priority.

<sup>13</sup> Homelessness Act 2002, S.14(8)

<sup>14</sup> We may decide to prosecute in cases of attempts to falsely claim priority for housing

- (5) they are assessed as having no significant housing need – i.e. they do not fit in any of the priority categories described in section 8 below.
- (6) they have sufficient financial resources to house themselves (see appendix 9 which explains how we determine this)

Any Harrow resident excluded from registering for access to bidding for public rented housing will be given a Locata “LIN” number to enable them to access their personal housing options and housing advice, which they can do by logging in to [www.locata.org.uk/harrow](http://www.locata.org.uk/harrow).

#### 7.6. **Assessment and decision**

The application assessment procedure is described in appendix 10. We will write to applicants to tell them if their assessment is likely to take longer than 28 days and the reasons for it.

#### 7.7. **Ineligibility decisions**

We will write to anyone we exclude from registering giving our reasons and, if they are a Harrow resident, offering access to online targeted housing options. A copy will be sent to the relevant social care services team if they are involved or if we consider it appropriate.

#### 7.8. **Right of review**

Applicants have a statutory right to ask for a review of a decision to exclude them from registering. The review procedure is set out in appendix 4. If the review upholds the original decision to exclude applicants can seek judicial review of the decision. Harrow also gives the right of review to those who disagree with their assessment (e.g. their priority band or date).

#### 7.9. **Right to reapply following exclusion from registering**

We will consider a fresh application if: -

- A previously out of Borough applicant has moved into the borough or
- immigration status has changed, or
- depending on the seriousness of the behaviour that led to the exclusion and the circumstances of the case, it can be demonstrated that there has been no recurrence of anti-social behaviour for a period of at least one year, or
- depending on the seriousness of the fraud, the false, misleading or withheld information was provided more than a year ago.

In the case of an excluded applicant the fresh application should be made using the change of circumstances form on the Locata website.

#### 7.10. **Change of Circumstances**

All applicants who register for housing with Harrow have a responsibility to keep the council informed of any change in circumstances that might affect their priority for housing, such as the number of bedrooms they need, if they have now lived in Harrow continuously for the last 5 years and qualify for additional priority, or the type of property needed. This must be done online through Locata through the completion of a “change of circumstances” form. If a person is unable to do this, they will need to contact the Housing Register service directly for further advice and assistance.

#### 7.11. **Lettings to staff, board members & councillors**

Staff, housing association board members, council members and their relatives are treated the same as any other housing applicant and must be seen not to be gaining any advantage or disadvantage or any preferential treatment in the course of their application. The procedure for ensuring that Harrow Council is transparent and equitable when letting homes to staff, board members and councillors is set out in appendix 14.

## 8. **Housing priorities in Harrow**

### a. **The statutory “reasonable preference” priorities**

As required by law we give “reasonable preference” to people who need to move for the following reasons:

- medical needs, including needs relating to a disability (**group 1**) Note: Harrow gives only those with a very high level of medical need to move reasonable preference for housing.
- welfare grounds (**group 2**);  
Note: Harrow gives only those with a very high level of welfare need to move reasonable preference for housing.
- they are occupying unsanitary or overcrowded housing, or are otherwise living in unsatisfactory conditions (**group 3**)  
Note: Harrow gives only those who lack *more than* one bedroom or are living unavoidably in *severely* unsatisfactory conditions reasonable preference for housing;
- the council has accepted a duty under homelessness legislation (**group 4**);
- another council has accepted a duty under homelessness legislation and Harrow is satisfied that the council that owes the duty is unable to provide accommodation (**group 4**)
- the council has agreed that they are homeless but has decided either that they do not have a priority need or that they are intentionally homeless or has ended the full duty because of refusal of a suitable offer (**group 5**).
- they need to move to a particular locality within the borough and failure to

meet that need would cause hardship (to themselves or others) (**group 2A**).  
Note: Harrow does not normally give priority to people who say that they need to move to a particular locality within the borough, because the area covered by Harrow is small and transport within it is very good, so there should be little disadvantage arising from living in one part rather than another. If, exceptionally, we are satisfied that there will be such hardship, which has given rise to a social services care plan requiring a move for this reason, we will treat it as a move on welfare grounds (**i.e. group 2**).

b. **Harrow's priorities**

In addition to statutory "reasonable preference" grounds, and in some cases as part of them, the council considers the following groups to be a priority for housing assistance:

- **Group 6 – Homeless duty ended by qualifying offer of private sector accommodation:** formerly accepted homeless applicants who have accepted a qualifying offer of private sector housing (should they choose to re-register and subject to the household continuing to have a priority need as defined by homelessness law);
- **Group 7 – Underoccupiers<sup>15</sup>:** People living in public rented accommodation which is larger than they need who are willing to move to smaller public rented accommodation (this can be anywhere in the country, not just Harrow).
- **Group 8 – No longer in use**
- **Group 9 (welfare preference) – Disability-adapted housing:** People living in public rented accommodation which is adapted or purpose built to accommodate physical disability where no-one in the household needs such facilities. We also prioritise for a move those council and housing association tenants who need major adaptations but whose current home it would be impractical or uneconomic to adapt.
- **Group 10 (welfare preference) – Adoption & fostering:** People recommended by Children's Services as suitable to adopt or foster one or more children but who need more appropriate housing in order to do so and do not have the means to source the accommodation themselves.
- **Group 11 – Unsuccessful applications for succession and occupiers holding over:** People who are not entitled to succeed to a council tenancy but to whom the council would have a statutory homelessness duty *and* who do not have the means to source alternative accommodation themselves, where the property is larger than they need or has adaptations in place that are not required by the occupier.
- **Council-interest transfers:** both emergency and urgent tenant transfers

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<sup>15</sup> Although under the Localism Act moves by social tenants who do not have statutory reasonable preference are not counted as "Allocations" and do not have to be prioritised alongside the applications of other people Harrow has decided to include them in the scheme and treat them as top priority along with emergency cases.



(**group 12**), permanent decants (**group 13**) and service tenant move-ons (**group 14**) that are in the council's interest (including for any of the reasons set out in section 4.7 above).

- **Group 15 – Ex-tenants moving on from an institution<sup>16</sup>:** Ex-tenant who relinquished their tenancy in a timely manner in return for a re- housing undertaking upon discharge from the institution.
- **Group 16 (welfare preference) – Young people leaving care (on an annual quota basis):** Young people leaving care, approved for move-on to a fixed annual quota of studio and one-bedroom accommodation, provided they meet the eligibility criteria set out in appendix 3.
- **Group 17 (welfare preference) – Move on from supported accommodation (on an annual quota basis):** People living in council-sponsored supported housing who are approved for move-on to a fixed annual quota of studio and one-bedroom accommodation.
- **Group 18 (welfare preference) – Move-on from residential care:** People who are ready for independent living who have been placed by the council in residential care accommodation.
- **Group 19 (welfare preference) – Older residents:** People who would be likely to retain their independence for longer if accommodated in a specialist housing scheme for older people (the schemes are described in section 15 below).
- **Group 20 – Serving and former-members of the armed forces and reserved forces and their families:** Former and serving members of the Armed Forces<sup>17</sup> who apply to Harrow and who have urgent housing needs, if they fall within one or more of the statutory reasonable preference categories (set out in section 8.1 above), will be given additional preference (i.e. a higher priority band than those with reasonable preference who are not armed forces applicants). The relevant groups comprise:
  - (i) serving members of the Armed Forces who need to move because of a serious injury, medical condition or disability sustained as a result of service;
  - (ii) former members of the Armed Forces or Reserve Forces;
  - (iii) the bereaved spouse or civil partner of a member of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner
  - (iv) serving or former members of the reserve forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service.

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<sup>16</sup> Institutions include prisons and mental health residential placements

<sup>17</sup> "former members" are defined as those who left the armed forces within 5 years of the date they make a housing application

## 9. The Banding Scheme

9.1. **Details of bands, band reasons, priority dates, bidding time limits and the consequences of refusal are given in appendix 16 of this allocation scheme.**

9.2. **The five priority bands are:-**

### **band A+ “Emergency & top priority”**

- Emergencies (both homeseeker & transfer categories) (this can apply to some households in groups 1, 2, 10, 12 and 19)
- Serving and former-members of the armed forces and reserved forces and their families with urgent housing needs (group 20)
- Underoccupiers (transfers only) (group 7)
- Non-statutory successors (group 11).

Note: band A+ is exclusively for those people who go to the top of the waiting list because of a life & death risk to their wellbeing or because they are ex-service personnel with urgent housing needs or because they are freeing up a larger social home.

### **band A “Urgent and high priority”**

- Homeseekers and transfers with an identified housing need to whom the council gives reasonable preference but who do not qualify for emergency band A+ (groups 1, 2, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 and 19).
- Transfers with an identified housing need to whom the council gives reasonable preference because they are occupying unsanitary or overcrowded housing or are otherwise living in unsatisfactory conditions (group 3) but who do not qualify for emergency band A+

### **band B “Standard priority”**

- Older residents whose likelihood of remaining independent would benefit from the supported environment of sheltered housing, but who do not meet the otherwise high assessment threshold for medical or welfare “reasonable preference” (group 19).
- Applicants who qualify for transitional relief.

### **band C “Non-urgent priority”**

- **Full homeless duty not accepted:** homeless people to whom the council has not accepted a duty, either because found intentionally homeless or because there is no priority need (under the prevention, relief or main duties).
- **Homeless people where the duty was accepted after 13 December 2012,** who have refused a reasonable offer of private sector housing since they

approached Harrow for housing.

- **Homeless people** where the council has accepted a duty under homelessness legislation and has provided either emergency accommodation (anywhere) or suitable self-contained temporary accommodation (under relief or main duties). **Homeless people** where the homeless application was made after 08 November 2012; band C will apply for up to 1 year from the date of discharge of the duty into a private rented sector home.
- **Another council has accepted a duty under homelessness legislation** and Harrow is satisfied that the council that owes the duty is unable to provide accommodation .
- **Homeless people** to whom the council has ended its duty because of a refusal of a reasonable offer of housing, as long as they remain homeless (subject to verification in case of a successful Locata bid).
- **Homeseekers** with an identified housing need to whom the council gives reasonable preference because they are occupying unsanitary or overcrowded private rented housing or are otherwise living in unsatisfactory conditions in private rented accommodation (group 3).
- **Serial refusers:** certain categories of people in band A+ who have refused a reasonable offer of housing, or people in band A who have refused 2 offers, or B who have refused 3 offers (details at appendix 14).
- **Deliberate damage to property:** people who, even though they are owed the statutory reasonable preference, have put their temporary accommodation or public rented housing into such a bad state, as judged on inspection<sup>18</sup> that the cost of bringing it back to a lettable standard far exceeds the acceptable level of costs that would normally be incurred

Note: If still living in the property the applicant can remedy the breach of tenancy by making good the damage, allowing inspection to check it, and applying for their earlier priority to be restored.

- **Unable to verify:** If we are unable to verify an applicant who has band A+, A or B priority for an offer<sup>19</sup> (we will demote the application to band C until verification can take place – see appendix 6). If a member in band C comes near to an offer and we are unable to verify them we will write to them giving 28 days' notice of disqualification from the register unless they contact us and co- operate to enable verification to take place.

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<sup>18</sup> Disrepair may be apparent because of failure to co-operate with inspection.

<sup>19</sup> An example would be where we try to carry out a home visit but cannot gain admittance in order to satisfy ourselves that the applicant is actually living at the address they have applied from.

### **band C- (minus) “Initial preference”**

- **Homeseekers** with an identified housing need who qualify for statutory reasonable preference but who have not lived continuously in the borough of Harrow for the last five years.
- **Applicants** with an identified housing need to whom the council give reasonable preference, where there has been a deliberate change in circumstances which has resulted in a worsening of a household’s circumstances (for example: moving from suitable accommodation into overcrowded accommodation or inviting other people to join a household and make it overcrowded)

### **9.3. Over-riding the banding priority system**

#### **(a) Banding over-ride**

The service manager for housing assessment has a residual discretion to increase the band of households whose defining features (including their multiple needs) are deemed to be so exceptional as to warrant a higher priority band than they would normally attract under the scheme. Such cases will be kept to a minimum and will usually entail some imminent threat, recent disaster, or an exceptional need not anticipated or covered by the scheme. Appendix 5 describes the assessment process for applicants with medical, welfare and multiple needs.

#### **(b) Allocation over-ride**

The service manager for housing assessment also has discretion, where they consider that the defining features (including the multiple needs) of a member in band A are so exceptionally severe as to warrant immediate/imminent re-housing, to enable the household to be made a direct offer outside the scheme (see section 23 on direct offers). Such cases will be kept to a minimum and will usually entail some imminent threat, recent disaster, or an exceptional need not anticipated or covered by the scheme

## **10. Waiting Time**

### **10.1. Moving between bands**

The principle of the scheme is that no one should overtake existing members within a higher band. Priorities within bands will be on a date order basis, according to the date the member was placed into that band.

- Moving Up a Band  
Moving up a band – the date that the higher priority has been given.
- Moving Down a Band  
Moving down a band – new priority date reverts to the date that applied when the member was previously in that band or any earlier date when they were in a higher band. The principle is that when moving down their priority date should be the earliest date that they were in the new lower band, or in a

higher band.

If the member has been suitably housed (i.e. they should have been disqualified) for any of the time, the new band date cannot be any earlier than the date they were subsequently assessed as A+, A, B, or C band.

<b>Table 4 – Examples of priority dates as applicants move between bands</b>	
<b>Example 1</b>	<b>Priority Date</b>
Member applies in January and is disqualified	None
In February member is placed in band A	February
In March member is placed in band A+	March
In April member is downgraded to band C	February

<b>Example 2</b>	<b>Priority Date</b>
Member applies in January and is placed in band B	January
In February member is placed in band A	February
In March member is placed in band A+	March
In April member is downgraded to band A	February

<b>Example 3</b>	<b>Priority Date</b>
Member applies in January and is placed in band B	January
In February member is placed in band A+	February
In April member is downgraded to band A	February

<b>Example 4</b>	<b>Priority Date</b>
Member applies in January and is placed in band A for medical reasons	January
In February member is accepted as homeless, moves to suitable temporary accommodation and is placed in band	January
In April member refuses direct reasonable offer but remains homeless – band C	January

<b>Example 5</b>	<b>Priority Date</b>
Older person applies for sheltered accommodation in January and is placed in band B	January
In February member changes his mind and wants one bed non-sheltered but has no reasonable preference for it and is disqualified	None
In April member is placed in medical priority - band A	April
By July member has refused 2 reasonable offers – band C	April
In August member becomes an emergency medical priority – band A+	August
In September medical need disappears – disqualified	None
In October new medical assessment – band A	October

### 10.2. Time Limits on high priority band A+ and A cases

- Time limits (shown in the chart in appendix 15) are enforced in order to ensure that only genuine emergency and urgent cases are given high priority. Members given emergency and urgent status must actively bid for properties, attend accompanied viewings when invited, and must not refuse offers on grounds that have nothing to do with their emergency or urgent housing needs.
- We want to be able to give people a realistic idea of how long re- housing will take under the scheme. We expect people to wait just long enough to meet their assessed needs, not to acquire a long waiting time in order to pick what they consider to be the best property. We will make such applicants a reasonable direct offer which, if refused, will result in demotion to band C or, for medical and welfare cases, from A+ “Emergency” band to band A.
- In practice time limits depend on the type of property needed and the supply during the bidding period. The council will take into account whether high priority members are making appropriate bids and whether they are refusing properties unreasonably.
- Band A+ “Under-occupation” rating has no time limit, because the council is keen to see under-occupiers move and will not penalise them for taking their time to decide.

### 10.3. Over-riding the band priority dates

The service manager responsible for housing assessment has a residual discretion to backdate the priority date of an applicant where it can be shown either:

- that there was a delay (not the fault of the applicant) in the obtaining or receiving of the relevant supporting information, *or*
- (in a case where the priority date is the date of the officer’s decision) that the decision took an unreasonable length of time and, had it been made in a timely manner, the priority date would have been earlier.

## 11. Who can be considered part of the household?<sup>20</sup>

### Both Homeseekers and transfer tenants

#### 11.1. Definition of immediate family

Only the applicant, their partner<sup>21</sup>, their immediate family<sup>22</sup> and anyone else with an exceptional need to live with them can be included on the application. This does not normally include lodgers or anyone sub-letting from the applicant.

#### 11.2. Family living abroad

The council will not include on the application any family member who is not resident in the UK at the time the application is made. Such members will only be added to the application once they are living in the UK and can clearly demonstrate that they have leave to remain and recourse to public funds.

#### 11.3. Joint access cases

Bedroom eligibility will be awarded to the main care provider (with whom the children live for more than half the week) who is in receipt of child benefit or tax credits. We will take into account both parents' housing arrangements to ensure that one property has adequate accommodation for the children, but they may have to accept an element of overcrowding when staying with the other parent.

#### 11.4. Extended family

Because of the severe shortage of larger properties applicants need to consider whether other people living in their household could move into smaller properties of their own. If a household member has already made a separate housing application we will not include them on the new application.

#### 11.5. Dependant relatives

A relative who has joined the household because they are unable to live independently will be included on the application only if there are no other options for the family<sup>23</sup>. We will expect to see advice from an appropriate professional

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<sup>20</sup> What follows is a guide to who the council assesses as eligible for re-housing. It does not mean that other people who fall outside the definitions cannot live in the household, even if it causes overcrowding, but they will not be taken into account in assessing the need for re-housing. Note however, that overcrowding may breach tenancy conditions.

<sup>21</sup> *Partner* means someone who lives with the applicant as a partner, or who would live with them if they were able to. It includes mixed gender and same sex couples, living in a permanent relationship, whether or not they are married or in a civil partnership.

<sup>22</sup> *Immediate family* means the applicant's children aged 20 or under who live with the applicant all the time, or for 4 or more nights every week. If a young person is living with a partner, or has their own children, they will not be included on the application unless they have an exceptional need to live with the applicant. Young people living away from home as students will not be included on the application.

<sup>23</sup> An example of an alternative option might be that the relative owns or occupies a larger property which could accommodate the whole family, rather than the relative moving into the applicant's home.

confirming that the relative needs to live with the family. Where this is not considered essential other options, such as sheltered housing, will be discussed with the family before an assistant manager in the housing assessment team decides whether the relative should be included in the application or advises them to make a separate housing application.

#### 11.6. **Carers**

A carer will be included on the application only where it can be demonstrated that:

- a live-in carer is essential on a 24 hour, daily and continuing basis, and
- a live-in carer has been identified and has moved in with the household or is ready to do so when accommodation is made available, and
- a manager in the housing assessment team (in consultation with the council's medical adviser or social care services as appropriate) agrees that a live-in carer is essential<sup>24</sup>.

#### **Homeseekers only**

11.7. People who were part of the household at the date of registration, and are still in occupation will be included on the application and, if successful, the tenancy.

11.8 We will also include children born since the registration date and children (under 21) joining the household where it can be proved that the homeseeker is the sole legal guardian and that there is no other option for re-housing. Where there is another legal guardian a decision will be made on a case-by-case basis to agree where it is reasonable to expect the child to be part of the household.

#### **Transfer tenants**

11.9. People who were part of the household at the start of the tenancy, and are still in occupation will be included on the application.

11.10. We will also include children born since the start of tenancy and dependent children (under 18) joining since the tenancy started.

11.11. If there are children aged 21 or over who are living at home we can advise them on their housing options, but they will not count towards any calculation of overcrowding (see section 21 below). (They may apply for housing in their own right, but may be disqualified because they have no priority<sup>25</sup>).

11.12. If we agree to re-house the immediate family but not everyone currently living with the applicant, the tenant has a responsibility to ensure that no unauthorised

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<sup>24</sup> Receipt of carer's allowance does not necessarily mean that that it is necessary for the carer to live with the person being cared for. In all cases, regardless of whether or not the carer is in receipt of carer's allowance, it will be necessary for the applicant to provide evidence that they receive disability benefits commensurate with the need for a live-in carer.

<sup>25</sup> The council does not give any priority to family members of tenants of public rented housing solely on the basis of their status as family members, unlike some other councils and housing associations which have "sons and daughters" schemes. We consider that this would be unfair to family members of private sector tenants.



occupants remain in the property when they leave it.

## 12. Removal from the Housing List

### 12.1. An applicant will be removed from Locata membership if:-

- it is found that they have never been or that they have ceased to be a qualifying or eligible person, *or*
- if they fail to respond following automatic “hibernation” (see 13.2 below) of their application on Locata or when invited to renew by a written communication from the council or Locata (see Section 13, Re-registrations), *or*
- the council considers there are good reasons for doing so.

### 12.2. Moving out of the borough

Normally, people who move out of the borough will no longer be eligible for band A+, A, B, C or C- and will therefore be disqualified. Those accepting an offer of temporary accommodation out of borough, and those to whom the council previously accepted a homelessness duty, who have accepted a qualifying offer to move into the private sector out of borough, will remain eligible. In exceptional circumstances the service manager responsible for housing assessment has discretion to allow other members to keep their registration and priority banding after they have moved out of the borough<sup>26</sup>.

### 12.3. Procedure for removing

We will write to any applicant (other than those subject to the “hibernation” process described in section 13.2 below) in band A+, A, B, C or C- before removing them from Locata membership, unless they have given us no forwarding address or other method of communication. The notice will explain why we are proposing to remove them and will ask the applicant to provide the information required within 28 days to enable us to decide on re-registration or removal. If the decision is to remove them we will notify them in writing with reasons and advise of their right to request a review (see appendix 4, review procedure). A copy will be sent to the adults or children’s social care service if they are involved or if it is considered appropriate.

### 12.4. Communication following removal from registration

If there is no response to the written notice in section 12 the application will be removed and the applicant will be unable to bid on Locata or to access their personal housing options on the Locata website. Applicants who discover that they have been de-registered against their wishes must contact us to discuss the circumstances, so that we can decide whether to reinstate the application.

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<sup>26</sup> An example could be an older person who is sick or disabled, has lived in the borough for a long time, has lost their accommodation through no fault of their own and has secured short-term accommodation outside the borough.

## 13. Re-registrations (renewals)

### 13.1. Rolling annual programme of re-registration

Members must renew their application every year. Failure to do so will result in de-registration.

### 13.2. Members not in bands A+ or A or accepted homeless

Three months before the registration anniversary a member receives an on-screen prompt on the Locata website – it requires them to confirm the details of their registration are up to date.

One month before the registration anniversary, if the member has not logged on to bid or check their personal housing options they receive an e-mail, text or letter (according to the preference they have expressed in their application) giving them 28 days to respond.

One month after the registration anniversary an e-mail, text or letter (according to the preference they have expressed in their application) is sent informing them that their application has been cancelled. In the Locata back office system the application is “hibernated”. If the member logs on within 3 months the application is automatically re-activated, but longer than this and a new application is required.

### 13.3. Members in bands A+ and A and those accepted homeless

Members not subject to hibernation will be written to if they have not communicated with us during the previous 12 months. We will check the applicant file for other recent contact such as bidding, telephone calls, interviews or correspondence. If the member appears to be vulnerable and/ or to have a high priority we may make a home visit. They are allowed one month after our reminder to re-register. If there is no contact we remove the member unless we consider that they should remain registered, and we will record our reasons for doing so on the applicant’s file.

### 13.4. Reinstatement of a closed application

A member who discovers that they have been de-registered needs to contact us to explain the circumstances, so that we can decide whether to reinstate the application and whether the original band and priority date still apply.

## 14. Inward mobility

### 14.1. Pan London Tenant Mobility Scheme – “housingmoves”

Harrow contributes a small percentage of its vacant properties to the scheme, which enables public rented housing tenants living outside Harrow to move into the borough. The scheme is reciprocal, so that incoming moves are counterbalanced by Harrow tenants who move out of the borough under the scheme. The scheme has its own application form and priority criteria, which Harrow will honour for incoming tenants provided their home landlord verifies their

circumstances satisfactorily at the time of offer.

#### 14.2. **Applicants from other Locata partners**

When non-Harrow applicants bid for Harrow properties under Locata cross partner bidding arrangements their eligibility for an offer may be assessed under Harrow's policy as the receiving partner rather than the policy of the registering partner, if it is different<sup>27</sup>.

#### 14.3. **Reciprocal requests**

Harrow only agrees to reciprocal requests when it is satisfied that the person is in urgent need, that they need to move to Harrow, and that the reciprocal property being offered will be beneficial to Harrow residents with high priority to move. We will not accept reciprocal requests from West London Locata partners, who can use the cross partner bidding arrangements. The team leader responsible for housing allocations and nominations decides whether to grant a request for a reciprocal move.

#### 14.4. **Special requests**

Harrow participates in various schemes that assist welfare agencies and others to manage housing difficulties experienced by their clients. There is a National Witness mobility scheme<sup>28</sup>, the pan-London Safe and Secure scheme<sup>29</sup> and the Pan London Housing Reciprocal scheme<sup>30</sup>. When we accept people from outside the borough under these protocols it is always on the understanding that Harrow residents in similar circumstances will be eligible to benefit from the schemes, and it is always a very small minority of lettings. Decisions to accept such cases are made by team managers in the Housing Needs Team.

#### 14.5. **Other requests**

Because of the shortage of accommodation in Harrow we only accept incoming nominations for sheltered and designated elderly accommodation<sup>31</sup>. Such nominations from other housing organisations can be considered only from homeseekers (from any borough outside the West London Locata partnership),

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<sup>27</sup> Examples (not exhaustive): (1) a bidder from another Locata partner who is banded A to C but, if assessed by Harrow, would be disqualified (2) a management transfer from another partner may expect to move from a flat to a house but we would treat them according to the Harrow management transfer policy of like-for-like only; (3) another partner's applicant has 12 months waiting time in a high priority band for a reason that Harrow would have time-limited to, say, 6 months.

<sup>28</sup> To enable those testifying in major criminal trials to make a new life away from the risk of reprisals.

<sup>29</sup> To tackle gang violence.

<sup>30</sup> Which enables people with public rented tenancies to move out of a borough where they are unsafe without losing their security of tenure by making a homelessness application

<sup>31</sup> Because there is no longer a national mobility scheme we expect the borough or landlord nominating the older person to Harrow to offer a reciprocal property for a Harrow resident wishing to move to that borough.

and from public rented tenants (from outside London<sup>32</sup>), where there is a local family connection. Applicants must register with the authority where they have the most connection but they can bid for cross-borough properties. Accepted applications will be placed in band B and treated as if they were in-borough applicants.

## 15. Housing for older people

15.1. Harrow has two types of accommodation specifically for older people. Where one partner of a couple is below the age required for eligibility for the scheme the team leader for lettings and nominations will decide on eligibility for the tenancy, in consultation (as necessary) with the housing assessment team and resident services team. Older people from outside Harrow may apply as stated in section 14.5 above.

### 15.2. Sheltered Housing

This type of accommodation is for members aged sixty or over (although age limits for schemes can vary) who are able to live independently and manage alone, but who will benefit from the added security of an on-call warden and an alarm cord system should it be necessary to seek help in an emergency. This includes people who can manage alone with the aid of a social services care package. Members with a disability may be considered for sheltered from 55 years.

**Sheltered tenant transfers:** Members who are already living in a sheltered scheme may apply to transfer to another, but will only get priority for this if there is a need (as opposed to a preference) for the transfer.

**Housing association specialist schemes:** Within this category there are a few sheltered schemes in Harrow that are owned by housing associations and which cater for customers with specific cultural needs, such as ASRA accommodation for Asian elders.

### 15.4. Extra Care Housing

Harrow has one extra care scheme, and other schemes are planned. The schemes are staffed by residential social care staff working on a rotational basis to provide cover 24 hours per day.

**Care Panel:** These schemes are not normally advertised through choice based lettings. Access to both schemes is by nomination via the Adult Services weekly care panel, which includes representatives from Adult Social Care, Housing and the Care and Support providers at the schemes. People age 55+ are eligible.

### 15.5. End of designation of Over 50s Blocks

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<sup>32</sup> Public rented tenants living in London are expected to apply to "housingmoves", and members in West London should use cross partner bidding on Locata.

Some council properties were previously designated for people aged 50 years and over. Over time and through the Right to Buy the age mix in those blocks has changed and they are no longer occupied by people aged 50 or over only. Therefore, there is no need to continue with such allocations and the properties will be made available to all eligible members regardless of age.

## 16. People with mobility difficulties

### 16.1. Mobility classification

Where an applicant, or one of the household, has mobility difficulties they are asked to state which of the following classifications best fits their circumstances:

1. They use a wheelchair all the time, both indoors and outdoors.
2. They cannot manage steps or stairs and do not rely on a wheelchair indoors, although they may use one some of the time.
3. Independent but can only manage one or two steps.

### 16.2. Mobility assessment


Irrespective of the band assessment, if the applicant self-assesses as mobility group 1 or 2, or if they say they have a substantial and permanent physical disability which may place them in mobility group 1 or 2, the Housing Assessment team will make a referral to the Occupational Therapy team, for a report on their housing needs. Taking into account the recommendations of the report the housing options officer will place the member in one of the following mobility groups:-

1. Wheelchair user indoors and outdoors.
2. People who cannot manage steps or stairs and may use a wheelchair some of the time.

If the applicant does not need any of the major facilities or adaptations implied by mobility groups 1 and 2, but they can manage only one or two steps, or if there is a medical report that states that someone in the household needs to be on the ground floor or in lift accessible accommodation, the options officer will place the member in the following mobility group:-

3. Independent but can only manage one or two steps

### 16.3. Purpose-built and adapted vacancies

The council has access to very few fully wheelchair adapted properties, although we make efforts to ensure that there is a good proportion of such properties in most of the housing association new build schemes in the borough. Fully and partially adapted and purpose-built properties are advertised with the mobility symbol  1 or 2, and lists of bidders are prioritised to make sure that those

waiting for this type of home get first consideration.

### 16.4. General needs property vacancies

Much of the council's stock of housing does not lend itself to economically feasible adaptation for wheelchair users. Because of the scarcity of suitable homes, and the urgency of the housing need of many people with physical disabilities, but we do try to ensure, where a property is suitable for adaptation and a customer with mobility difficulties is interested in it, that we commission the necessary adaptations, in partnership with our colleagues in the occupational therapy service. For this reason, we try to ensure that our property adverts are as informative as possible so that customers with mobility difficulties are able to bid for suitable properties and do not waste their bids on unsuitable ones.

#### 16.5 **Ground floor and lift accessible properties**

We also earmark much of the small stock of ground floor and lift accessible properties for people in mobility group 3, and advertise them accordingly as



3. Conversely, where an applicant has been classified as mobility group 3, we do not shortlist them for unsuitable properties, such as houses with stairs, unless the best solution for them would be to install a stairlift. This would usually only apply to larger properties such as 3 and 4 bedroom houses, because of the shortage of 3 and 4 bedroom ground floor and lift accessible apartments in Harrow. We would be very unlikely to agree to install a stairlift in a 2-bedroom house, when there is a reasonable availability of 2-bedroom ground floor flats to bid for.

## 17. Advertising properties

#### 17.1. **Where and when the properties are advertised**

Partners and associates advertise their vacant properties online through the Locata website, [www.locata.org.uk](http://www.locata.org.uk) every week. Personalised hard copy sheets of available properties can be provided to people who are unwilling or unable to use the website to search for a home.

#### 17.2. **Exclusions from advertising**

The assistant service manager responsible for housing allocations and nominations decides when to advertise potentially vacant properties and when to exclude properties from advertising under the choice based letting scheme. We aim to advertise and allocate through Locata 80% to 90% of available general needs and ordinary sheltered homes (i.e. not including extra care and supported housing designated for particular groups such as people with learning difficulties).

#### 17.3. **Limitations on who can bid for each property**

Taking into account their targets and responsibilities under the scheme, the team manager for housing allocations and nominations sets the eligibility criteria for bidding for each advertised property and is responsible for ensuring that they are adequately described in the adverts:

- whether available for transfers or homeseekers or both, minimum and maximum numbers of persons in the household if children are allowed
- in the case of a house or flat with a private garden whether it will be prioritised for families with children under the age of 12 (done whenever

- practicable)
- if there are age-limits (e.g. over 55, 60 or 65)
- the mobility level, if applicable (see section 16 above on physical mobility needs)
- if applications are restricted to or prioritised for special cases such as quota/ homeless/ decant/ key worker/ same estate/ overcrowded or underoccupying households
- if pets are allowed
- whether available for cross-borough bids
- if sheltered
- whether in a scheme that caters specifically for a particular group of people (e.g. Asian elders)

#### 17.4. **Other information given in the adverts**

The adverts also, where possible, specify:-

- location, including street/ estate/ district/ postcode as appropriate, to give bidders a clear idea of where the property is situated
- who owns the property and whether it is a specialist landlord
- type of tenancy (e.g. flexible /fixed term)
- the weekly or monthly rent including any other charges
- type of rent (e.g. social, affordable)
- the estimated date the property will be ready for occupation
- if a local lettings policy applies.

#### 17.5. **Local lettings policies (LLPs)**

The council may from time to time implement a Local Lettings Plan which will set out how properties will be allocated in exceptional circumstances to meet area specific issues, for a specific block or estate. This will ensure that there is a planned approach to the letting of high density/high rise schemes to ensure sustainable mixed and balanced communities.

The Council may also agree with partner housing associations a local lettings policy aimed at promoting sustainable estates, good tenancy management, and meeting the needs of a local area.

LLPs must be evidence-based and fulfill a clear need<sup>33</sup>.

For Council Scheme LLPs, these will be authorised by the Divisional Director for Housing following consultation with the Portfolio Holder for Housing under a delegated authority.

For LLPs agreed with partner housing associations these must be approved by the

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<sup>33</sup> Example objectives might be to reduce anti-social behavior, reduce high child densities, dilute high concentrations locally of people with support needs, increase the proportion of working people on a particular estate, or to ensure that, where there are high concentrations of older residents, they are able to live in peace.

service manager for the housing needs service in conjunction with any relevant housing association(s) following an equalities impact assessment that takes into account any effect of the policy on the council's ability to house applicants with high priority within the expected timescales<sup>34</sup>. LLPs should be reviewed by the service manager for housing provision in conjunction with the partner housing associations on a regular basis (at least every two years).

#### 17.6. **Sensitive lettings**

Occasionally a property becomes available for letting which, because of particular circumstances such as the frailty or vulnerability of neighbours, it is deemed that it should be let "sensitively". No tenancy will be offered for such a property until it is confirmed that neither the prospective tenant nor any member of their household has:

- a history of anti-social behaviour or nuisance
- a history of drug or alcohol misuse
- a history of drug-dealing caused housing management problems in previous accommodation, including emergency and temporary accommodation.

Other factors may be taken into account where justifiable. For example the nature of the sensitivity may indicate that the property should be let to a male or female applicant.

Conversely a neighbour of a property to be let may have a history of behavior which indicates that the property should not be let to a person who is likely to be particularly vulnerable to harassment or aggressive behavior. The assistant service manager responsible for housing allocations and nominations decides whether to designate and let a property as "sensitive".

#### 17.7. **Housing association vacancies**

Some of the housing associations with properties in Harrow are Locata partners. These associations advertise and allocate their properties directly using the Locata system. While the housing allocations team tries to ensure that these adverts are in line with Harrow standards and that Harrow's lettings policies are followed, it is not always possible to achieve compliance. Some housing associations have their own allocation policies which differ from Harrow's, so it is very important to read their adverts particularly carefully.

#### 17.8. **Complaints relating to housing association lettings**

Complaints about adverts and allocations by Locata partners should be addressed to those partners. While we will do our best to assist in resolving such complaints and will take responsibility if the association was acting on our instructions, we cannot be held liable for errors made or separate allocation policies followed by

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<sup>34</sup> Examples of groups that might be prioritised in a local lettings policy might be transfer applicants with a positive tenancy history (no arrears, not history of anti social behavior), smaller families, people who are not vulnerable, employed people, people from the local neighborhood or estate, or people of a minimum age.



these bodies, which are independent of the council.

## 18. Bidding for properties

### 18.1. How to express an interest (“bid”)

Qualifying and eligible members (bands A+ to C-) can express an interest in a limited number of properties, making up to 3 bids per week, for adverts on Locata, by whichever method they prefer of:

- bidding by telephone
- text message
- bidding online via the website, [www.locata.org.uk](http://www.locata.org.uk) (Harrow libraries provide use of computers free of charge to local residents), or
- any new technology that may become available in the future.

### 18.2. Limitations on bidding

Members who make more than the allowed number of bids will have the additional ones disregarded, so it is important to bid for no more than 3 homes; one of the ineligible bids might be the one that would have given the best chance of a property viewing.

### 18.3. Bidding for the wrong properties

The Locata choice based lettings technology excludes from consideration all bids for a property that do not meet the eligibility rules and the criteria set by the assistant manager responsible for housing allocations (see sections 17.3 above and 19 below). Members who consistently bid for properties for which they are ineligible may be contacted to discuss their bidding.

### 18.4. Direct allocations

Members who urgently need to move and who do not bid for properties may receive a direct offer (see section 23, direct offers, below).

### 18.5. Persons not suitable to bid

If the multi agency public protection panel (MAPP) recommends that a tenant or homeseeker with high priority should be excluded from bidding such people will be assisted by a direct offer (see section 23, below)

### 18.6. Support with bidding

Full details of how to bid and the other features of the scheme are set out in Locata’s online scheme guide, which can be obtained from the council if the applicant has no access to a computer. Staff in the housing needs service assist and encourage members with support needs and those who have difficulty with written English to use the website to choose and bid for properties. The council keeps an “assisted bidding” list of those who tell us that they are unable to engage with the system themselves, and also provides support and training for relatives, social care, advocacy and advice agencies so that support workers are able to assist their clients to use the system.

## 19. Eligibility of Bids

### 19.1. Bidding rules

**Location of properties** – Harrow Locata members may bid for properties advertised in the following sections of Locata:-

- Harrow
- Cross-Borough
- Any of the individual housing association pages

**Table 5 – Bidding rules**

To be eligible, a bid from a Harrow member must satisfy the following

Rule	Notes
There is no current offer of another property <sup>35</sup>	Making an offer to a member makes all other bids from that member ineligible whilst the offer remains on the table
Member is registered with Harrow, or with a partner housing association and is resident in Harrow.	If a property is a Harrow property and not advertised cross-borough, the member must be registered with Harrow or with a partner housing association (resident in Harrow).
Member is in correct category (“housing list”)	The member’s housing list (Homeseeker or Transfer) must match that of the property
Bid before deadline	The bid must reach Locata before the bidding list closes
Only three bids per fortnight allowed	Only the first 3 bids from a member for a round of Locata adverts are eligible
Maximum persons	The member’s household must have no more than the maximum number of persons for the property <sup>36</sup>
Minimum persons	The member’s household must not have less than the minimum number of persons for the property <sup>37</sup>
Maximum beds <sup>38</sup>	A member cannot bid for a property with more bedrooms than they are assessed as needing
<del>Minimum age</del>	<del>The member must satisfy the age requirement on the property label</del>
<del>Mobility level</del>	<del>Mobility level 1 and 2 properties are not available for bids from able-bodied households.</del>

<sup>35</sup> If a member comes top of more than one to offer is at the landlord’s discretion

<sup>36</sup> Management transfers bidding for like-for-like properties may be exempted from the maximum persons rule, as may

<sup>37</sup> Management transfers bidding for like-for-like properties may be exempted from the minimum and maximum persons rule, as may some ex-service tenants and underoccupiers.

<sup>38</sup> Under-occupiers (and members releasing adapted property at the housing assessment manager’s discretion) may be allowed to bid for larger property than they would otherwise be assessed as needing

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### 19.2. Other bidding criteria

In addition to the basic rules set by the system described in section 19.2 above members may be ineligible for an offer on a property where they do not meet the advertised criteria, examples of which are described in section 17.3 and 17.5 above. Other rules are applicable to particular groups – for example a management transfer will not be considered if they bid for a non “like for like” property, and an applicant in mobility group 3 will not be eligible for an unsuitable property with stairs (as described in section 16.5 above).

### 19.3. Number of bedrooms

Although an applicant is registered as needing a certain number of bedrooms, as assessed by the bedroom standard (see section 21 below for more information on this), it is often in their interests to consider bidding for properties with a smaller number of bedrooms. This is because the waiting time is likely to be less, as supply of smaller homes is greater<sup>39</sup>.

### 19.4. Illegitimate bidding

It is important that applicants keep the housing department up to date with their circumstances, such as people leaving their household, new additions to the household and deteriorations and improvements in physical mobility. If a bid is placed for a property on the basis of out of date information and comes high on the list for it with an invitation to view, the applicant will not be offered the property if the change in circumstances mean that they would not have met the advert criteria or would have had a lower priority for that property (see more information about how we verify applicants at the point of tenancy offer in section 22 below).

## 20. Tenant selection, viewing and offers

### 20.1. Ranking of bids

All eligible bids for each property are placed into priority order. Priority is decided:

- first by band
- second by date order within each band
- third by registration date, and
- finally by random selection<sup>40</sup>.

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<sup>39</sup>For example an applicant with a teenage girl and boy “needs” 3 bedrooms, but is likely to achieve re-housing much quicker if they are prepared to consider 2 bedroom properties

<sup>40</sup>Every bid is assigned a random number when the bid is made. This number is used to resolve ties - where both priority date and registration date of two successful bidders are the same - the higher random number gets priority.

Where a property has been advertised to give preference to a mobility group, bids from these applicants will be prioritised as described but ahead of bids from members who are not in that mobility group.

**20.2. Decisions relating to the list of bidders**

The prioritised list is given to the landlord for offering.

**20.3. No expressions of interest in a property**

If there are no eligible bidders for a property the manager responsible for housing allocations and nominations may decide either to make a direct offer (see Section 23, below), or re-advertise it, or refer it back to the landlord (or Harrow Resident Services as appropriate).

**20.4. Invitations to view**

In order to minimise delays most Locata landlords arrange multiple viewings, usually inviting up to five members per property. Members must bring proof of identity to the viewing. Unverified members (see appendix 6 on verification) are advised via the "Invitation to view letter" to contact their housing officer within 24 hours in order to arrange for verification and confirm their eligibility, wherever possible prior to the viewing date.

**20.5. Ability to afford the rent**

Applicants who are found at verification to be unable to afford the rent for a particular property will not be offered that property. Whether the accommodation is affordable will be determined taking into account the financial resources available to the applicant and the level of rent for that accommodation<sup>41</sup>.

**20.6. Verification for an offer (see appendix 6 for details)**

The housing assessment team carries out any further eligibility checks considered necessary, maintaining contact with the importing landlord throughout the process. Members who fail to have their verification completed before the viewing date may not be offered the property, so it is very important to provide all the documents and proofs requested quickly, and to allow access if a home visit is needed. When eligibility and priority have been confirmed the member with the highest priority who attended the viewing is offered the property and invited to sign for the tenancy.

**20.7. Verification of members from other Locata partners**

A process is in place for partners to accept the verifications carried out by each other. However, Harrow reserves the right not to accept a member registered and verified by a partner organisation if we have reason to believe a Harrow member in similar circumstances would not have been approved for that property.

**20.8. Property condition**

Empty properties in sheltered housing are routinely decorated if the decoration is

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<sup>41</sup>The applicant may be asked to demonstrate how they would pay the rent by, for example, setting out what payments they would make out of their income, and an assessment would need to be made as to how realistic this would be.

in poor condition. Other empty properties will be redecorated by the council if the decoration is in poor condition, the new tenants are disabled, and they wish the council to decorate for them. Decorating by the council usually consists of 2 coats of emulsion to walls and ceilings. All other empty properties where decoration is poor have a decoration allowance available for new tenants to carry out the decorating themselves. Refusal of a property on the grounds of poor decorative condition is not normally considered as a “reasonable” refusal, because the new tenant could make the property suitable by decorating it.

#### 20.9. **Refusals**

If the member refuses an offer, the next member is selected. Penalties for unreasonable refusals are set out in the chart in appendix 15. The property may be reserved for a direct offer to someone who fails to attend or who wishes to refuse it, in order to protect, for example, a potentially homeless member from eviction. We ask housing association partners to co-operate with us, by not immediately signing up the next person on the list in cases where we have made a direct offer to an urgent case and have requested that the property be held for them.

#### 20.10 **Tenancy transfers**

Existing council and housing association tenants cannot be granted a new tenancy until they end their existing tenancy.

#### 20.11 **Joint tenancies**

It is usual for a joint tenancy to be granted to married and cohabiting couples, civil partners and same sex couples, .

## 20.12 Information about the reason for the vacancy

If the previous tenants left because of racial harassment, prospective tenants of ethnic minority origin will be advised of this after they have viewed the property and expressed an interest in it, but before they formally enter into a tenancy.

## 21. Number of bedrooms

### 21.1 Maximum and optimum numbers of bedrooms

The maximum number of bedrooms for which members are eligible to bid is determined by the size of their household but, as there is a shortage of large homes, many members will be advised seriously to consider bidding for smaller accommodation than they would prefer. Where a property has two living rooms and one can reasonably be used as a bedroom, the property advert will be labelled on that basis<sup>42</sup>.

### 21.2. Bedroom needs assessment

**Table 6 – Comparison of bedroom standard and Harrow rules**

Maximum bedroom eligibility is determined using the following guidelines, which are based on the national “Bedroom Standard” (BS) but with some difference

<b>BS – separate bedroom</b>	<b>Harrow scheme for comparison, including changes from the previous allocation scheme</b>
A married or co-habiting couple	The same as the BS and the same as the previous allocation scheme
An adult aged 21 years or more	Harrow’s scheme does not take into account sons and daughters aged 21 or over in calculating the number of bedrooms required. Instead we will do our best to assist adult sons and daughters to find their own private sector accommodation. Where Adult Social Care recommends, and we agree, that it is essential for an adult son or daughter to remain in the family home either to give or receive care, we will allocate a bedroom accordingly. Similarly, adult relatives living as part of the household are entitled to a bedroom if they need to live with the household either to give or receive care (see section 11 above).

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<sup>42</sup> A “three bedroom parlour house” therefore will be advertised as a 4-bedroom home, and those eligible for a maximum of 3 bedrooms will not be eligible to bid for it.

A pair of adolescents aged 10-20 years of the same sex	(a) The previous allocation scheme assigned a separate bedroom to same sex siblings where one is aged 10 or more if there was a 5 year age gap. This is no longer the case as the new scheme applies the BS. (b) If the household comprises a mother aged under 21 with a daughter they will be eligible for a bedroom each, just as if the mother was aged 21.
A pair of children aged under 10, regardless of sex.	The previous allocation scheme assigned a separate bedroom to opposite sex siblings where one is aged 7 or more. This is no longer the case as the new scheme applies the BS.

### 21.3. Discretionary additional bedroom

A housing assessment team leader will add a bedroom where the medical adviser recommends this as essential for the applicant's independence<sup>43</sup>. We will try to check with a benefits provider whether they will agree to pay benefit for an additional bedroom and advise the applicant accordingly before completing our assessment, in case the answer is negative and the applicant would be unable to make up the rental shortfall.

### 21.4. Ex-service tenants and Underoccupiers

An additional bedroom may also sometimes be agreed for an ex-service tenant (by the manager responsible for the housing assessment service) or an underoccupier (by a housing assessment team leader. The manager agreeing an additional bedroom must first satisfy themselves that the property is going to be affordable for the applicant. In such a case, if it is necessary to meet the minimum occupancy criteria for the relevant property adverts, a "dummy" household member will be added to the application to ensure bidding eligibility for the agreed size of home.

### 21.5. Overcrowding

Only where a household lacks two or more bedrooms, as calculated by the bedroom standard set out in section 21.2 above, will they qualify for reasonable preference with Harrow. This is because, in the prevailing housing conditions in Harrow, many people lack a bedroom without a need for public rented housing being indicated. Unless there are other factors causing multiple needs that adversely affect a household's housing circumstances, lacking one bedroom no longer attracts any priority in Harrow.

### 21.6. Renewing Fixed-Term tenancies

Where registered providers continue to use fixed-term tenancies, their assessing officer is expected to look carefully at the number of bedrooms needed by the

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<sup>43</sup> Examples: (1) a live-in carer is essential, (2) the person's medical condition requires such a large amount of equipment to be stored in the home that it is not practical without an additional room, (3) a husband and wife are unable to share a bedroom because of a medical or welfare difficulty.

household when their fixed-term tenancy is reviewed prior to their renewal date. If people have left the household, or care needs have changed, since the tenancy was granted, and if it is agreed that the tenant continues to be eligible for a public rented tenancy, the new tenancy will be offered for a smaller home in line with the reassessed need. Such new tenancies will either be offered directly or through banding on Locata, as appropriate to each case.























**21.7. Bedroom need (maximum and minimum) at a glance<sup>44</sup>**

The table on the next page specifies the maximum and alternative acceptable occupancy standards for bidding on Locata, subject to individual property advert restrictions.

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<sup>44</sup> Shows the number of bedrooms needed - only where the current home is 2 bedrooms short of this number will preference for overcrowding be given.



<b>Table 7 – At a glance bedroom need calculator</b>							
	Studio/ Bedsit	1	2	3	4	5	6
Single Person							
Cohabiting or Married Couple							
Adult siblings wishing to live together <sup>45</sup>							
Pregnant but childless woman (with or without partner)							
Parent(s) with one child <sup>46</sup>							
Parent(s) with one girl and one boy both aged under 10							
Parent(s) with two same sex children Aged under 21							
Parent(s) with 1 girl and 1 boy where one is 10 or older							
Parent(s) with 1 girl / 2 boys, or 2 girls / 1 boy all aged under 21							
Parent(s) with 4 children, 2 of each sex, all aged under 21							
Parent(s) with 4 children where 3 are of 1 sex and 1 of the other & all aged under 21							
Parent(s) with 5 or more children all aged under 21 <sup>47</sup>							

### 21.8. Realistic bidding

Members will be advised that they stand a greater chance of successful early re-housing if they bid for the smallest property for which the number of people in their household is eligible, because supply is greater the fewer bedrooms there are. Supply of 5 and 6 bedroom properties is almost non-existent.

<sup>45</sup> Unless it is agreed that one sibling is the carer for the other

<sup>46</sup> parent(s) with one child in a bedsit or studio flat will not be regarded as 2 bedrooms short and therefore do not qualify for overcrowding priority. Similarly, if they have a room or rooms in a parental home they will not qualify for overcrowding priority unless there is a particular reason why they cannot establish their own home in the private sector.

<sup>47</sup> maximum bedroom need depends on age & sex of children.

## 21.9. Studio Flats

Although many applicants need, according to the BS, only a self-contained bedsitter or studio flat, we generally assess them so that they are able to bid for 1-bedroom homes because, unlike some of our west London partners, Harrow does not have many studios in its housing stock. Studios are less popular, so waiting times are shorter for applicants who are prepared to consider one. They will also be regarded as a suitable offer should bidders, or applicants to whom we are making a direct offer, refuse them on the grounds of their relatively small size. Exceptionally, for special reasons, an applicant may be assessed as eligible to bid only for studios, called on the Locata system "0 beds".

## 22. Verification of circumstances prior to an offer of housing

### 22.1. Offer withdrawal or bypass

We verify all people who are likely soon to be made an offer of housing, to check whether they still have the level of priority and bedroom requirements assessed when they were given their priority banding, and to check their identity and proof of where they are living. Our verification procedure is described fully in appendix 6. If we are unable to verify circumstances we may demote the applicant on Locata to band C until we can make contact and resolve outstanding queries.

Members will not be made an offer of accommodation, and their banding will be downgraded (to A, B, C, C-) or they will be disqualified and removed from the register, as appropriate, if, at the time they bid for a property, any of the following circumstances exist:-

### 22.2. Change of circumstances

The member has not informed us of a relevant change of circumstances or has completed their application inaccurately, resulting in an incorrect assessment. This might have given the member higher priority than they should have had, or over-calculated the bedrooms needed, or made them eligible for a type of property to which they were not entitled (e.g. mobility- adapted).

### 22.3. Disqualification

The member is a person from abroad who has fallen out of eligibility because of a change in their circumstances.

Note: Such members will be excluded and cannot reapply unless and until their circumstances change, as described in appendix 3.

### 23.4. Unable to afford the rent

The reductions in and caps on benefit have resulted in problems for benefit dependent people, especially those with large families, living in all parts of

London, including Harrow<sup>48</sup>. In the event that an applicant is found to be unable to afford the rent they may not be verified for an offer.

- 22.5. **Financial resources available to meet own housing costs** Applicants who are found to have sufficient financial resources (income/ capital/ freehold, leasehold or joint interest held in a home) to obtain accommodation for themselves in the private sector or through a low cost home ownership scheme, taking into account the size and type of property needed (appendix 9 sets out the financial limits we apply).

Note: Such members will be given advice about home ownership options, disqualified from Locata, and cannot ask for a reassessment until they can show that there has been a change in their financial circumstances which was beyond their control. In exceptional circumstances the service manager responsible for housing assessment has discretion to make offers to underoccupying tenants and to those with negative equity and those who would be unable to manage a mortgage because of age, infirmity, disability, etc.

22.6. **Right to buy application**

Tenants who have a current application to buy their dwelling or for a home purchase grant, e.g. Homebuy, at the time a bid is made for a property. Note: Such members will be disqualified on grounds of “sufficient financial resources”. In order to have their high priority reinstated the member will need to withdraw their purchase application and show that they no longer have the financial wherewithal to purchase their own home.

22.7. **Behaviour which affects suitability to be a tenant**

Applicants who are found at verification to have one of the following issues:

- Council and housing association tenants, and homeless homeseekers placed in temporary accommodation, who have rent arrears (appendix 11 sets out the council's rent arrears policy)

Note: Such members will be downgraded to band C. Team managers in Housing Needs have discretion to keep the high priority, or reinstate it at a later date, if the member is in band A\*, or where other exceptional circumstances apply, or where the arrears are paid off before a firm offer is made or, depending on the level of arrears, if the member has made a satisfactory agreement to clear the arrears and has kept to that agreement for at least six months and paid off at least 50% of the arrears.

- Tenants upon whom the council or housing association has served notice of its intention to seek possession or obtain an injunction, due to breach of one or more (non-rent-arrears) tenancy condition.

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<sup>48</sup> This is why we have introduced services to assist people to move to parts of the country where rent levels are lower and council waiting lists shorter.

Note: Such members will be excluded and cannot reapply for at least a year, as described in section 7.9. Reinstatement of registration with the previous high priority happens if and when the council or housing association withdraws legal action or a court decision is given in favour of the tenant.

- Ex council and housing association tenants, who have deliberately lost their accommodation e.g. eviction due to rent arrears.

Note: Such members will be downgraded to band C. In order to have their high priority reinstated the member must wait at least one year and will need to demonstrate that they have conducted their tenancies well since the eviction.

- Council and housing association tenants and homeless homeseekers placed in temporary accommodation who have wilfully damaged or neglected their property, or who are refusing to allow repairs to be carried out.

Note: Such members will be downgraded to band C. In order to have their high priority reinstated the member must demonstrate that they have remedied the damage.

- Tenants or homeseekers, where they or any member of their household has attacked or threatened staff or has a history of anti- social or criminal behaviour related to housing, or is found to have given false or misleading information in order to obtain a tenancy, as described in section 7.5 above.

Note: Such members will be excluded and cannot reapply for at least a year, as described in section 7.9.

- Tenants or homeseekers who owe the council money.

Note: Such members will be downgraded to band C. In order to have their high priority reinstated the member must demonstrate that they have repaid what they owe, or that they have made a satisfactory agreement to pay and have kept to that agreement for at least six months and paid off at least 50% of the original debt.

#### **22.8. Demotion after verification**

We will write to any member whose priority is reduced as a result of verification, explaining why and advising them of their right to request a review of our decision. (Appendix 4 sets out the Review Procedure)

## **23. Direct offers**

### **23.1. Circumstances for direct offers**

In certain limited circumstances, we use our discretion to allocate properties directly to the following members and to applicants ineligible to become members. Whenever possible the offer we make will be for a property for which a bid has been placed on Locata either by the applicant or by staff, and for which the applicant would be the highest priority bidder. We consider a reasonable offer of

accommodation to be one which is not in an area which is known to be unsafe for that member and, so far as reasonably practicable, matches the size and type of property for which the applicant is eligible as set out in the table in section 21.7 above. As there is a shortage of large homes, the applicant may be offered smaller accommodation than they would prefer, in furtherance of the council's statutory homelessness duties.

**23.2. Special circumstances**

Some applicants will not be allowed to bid under choice based lettings Examples are public protection panel cases and applicants under the age of 18 (where the council has accepted a homelessness duty, or who are in the Leaving Care Quota). One offer, in line with policy, will be made and, if it is unreasonably refused, the applicant will be disqualified.

**23.3. Band A+ emergency and band A urgent need**

Where a band A+ and A applicant has not been successful on Locata either because they have not been bidding, or because they have refused one or more reasonable offers, or they have not turned up to a viewing when invited, we may make a direct offer. The chart in appendix 16 outlines to which groups of applicants we may make direct offers.

**23.4. Under-occupiers in very desirable properties**

Where an under occupier has highly specific requirements (e.g. they will only be tempted to move if a particular property is offered to them) we may decide to offer that property to them directly, outside Locata.

**23.5. Temporary decants**

We will make one direct offer of a reasonable transit property to tenants who need to be temporarily moved out. If the offer is refused we will start possession proceedings.

**23.6. Permanent decants**

We will make one suitable offer to tenants who need to be permanently decanted, but who have failed to make a successful bid for alternative accommodation within the necessary timescale. If the offer is refused we may start possession proceedings.

**23.7. Non-statutory successors, unauthorised occupants**

Non-statutory successors and/ or unauthorised occupiers who are offered a discretionary tenancy - One offer will be made to those who have failed to make a successful bid for alternative accommodation within the necessary timescale. If the offer is refused we will start possession proceedings.

**23.8. Over-riding emergency need**

Members in band A+ whose defining features (including their cumulative needs) are considered by a service manager in the Housing Needs team to be exceptionally severe may be made a direct offer in order to effect their immediate re-housing.

### 23.9. **Limited circumstances**

In certain limited circumstances, we may use our discretion to allocate properties directly to make better use of our housing stock or to exercise our homelessness duty. Decisions on this will be made by one of the following: Head of Housing Needs or a Senior Housing Needs Team Manager.

## 24. **Non-secure tenancies**

### 24.1. **Tenancies which can be offered on a non-secure basis**

If a block is scheduled, or being considered, for redevelopment or demolition, or for any other reason consistent with best use of council resources (as set out in section 4.7 above). the Council may decide to re- let vacant properties to homeless households on non-secure tenancies.

### 24.2. **What happens when possession is required**

If the Council requires possession of a property in order for redevelopment or demolition to proceed, the Housing Assessment Manager will place homeless households who are non-secure tenants of that property into the appropriate band depending on whether possession is imminent and whether it is appropriate to offer each applicant alternative temporary accommodation. This will also apply to housing association assured shorthold tenants living in the same block.

### 24.3. **Asylum seekers**

Asylum seekers who do not qualify for housing but who have been accepted as unintentionally homeless and in priority need may have been housed in a Council property with a non-secure tenancy.

If Asylum Seekers are granted exceptional leave to remain in this country, or refugee status, they will qualify for housing. In these circumstances, the Head of Housing will authorise the granting of a secure tenancy of the property they occupy unless one of the following applies:-

- the Council is taking or seeking to take action against the tenant due to rent arrears or other breach of tenancy
- the property is larger than the tenant needs
- the property is in a block that is scheduled for demolition or redevelopment or which the Council has a policy of letting only to non-secure tenants, because it is considering demolition or redevelopment.

## 25. **Refusals following direct offers**

### 25.1. **Recording the refusal**

The applicant must give their reasons for refusal in writing, or sign a written statement of their reasons. The property will not usually be held vacant while the refusal is investigated – it will normally be re-offered and let to another applicant unless the offer is to a homeless household. In such cases the offer may be held for a short period (usually no longer than 48 hours) while the reasons for the

refusal are considered in consultation with one of the team leaders for homelessness advice and assessment and the applicant is advised of the possible consequences and given a chance to reconsider their decision to refuse.

**25.2. Consequences for homeless applicants of refusing a reasonable offer.**

A team leader in either the assessment or provision team will interview the applicant and record the discussion. If, having heard the reasons for refusal, they consider the offer to be suitable, they will explain to the applicant the council's intention to discharge its homelessness duty, advise them of their right to seek a review of this decision (see appendix 4, review procedure), and of the importance of them accepting the property (which they can do while still pursuing a statutory review) if they wish to avoid being evicted from their current accommodation.

Following the interview they will inform the applicant of their decision by letter. In cases of unreasonable refusal we will advise the applicant of our intention to discharge the homelessness duty and, if the applicant is occupying temporary accommodation provided by the council, to commence eviction proceedings. Homeless applicants have the right to seek a formal review of our decision and, if still not satisfied, to pursue their disagreement with our homelessness decision through the courts. Priority will be reduced to band C.

**25.3. Unsuitable offers**

If there is a clear mismatch e.g. where the homeseeker or property details were recorded incorrectly, the offer will be withdrawn and the applicant notified by letter.

The applicant may provide new information which substantiates their claim that the offer was unsuitable. The interviewing team leader may need to consult other appropriate officers before deciding whether the offer was unreasonable. If they find in favour of the applicant they will accept the refusal, withdraw the offer, and restore the applicant's priority.

If a reviewing officer finds in favour of the applicant their priority will be restored to the band and date that applied at the time of the offer. Applicants should note that the review officer normally has 8 weeks to review the decision, and may not agree to provide "accommodation pending" to a homeless applicant while doing so.

**25.4. Ex-service tenants**

Following a refusal of a reasonable offer ex-service tenants will be advised that their priority for re-housing has been withdrawn and that the council considers it has fulfilled its contractual obligation to offer suitable re-housing. The member will be invited to make their own housing arrangements and eviction proceedings from the tied accommodation will be started.

**25.5. "Special circumstances" and quota cases**

Following a refusal of a reasonable offer, applicants will be advised that their high priority has been removed and they will be placed in the appropriate band on the general waiting list if they are eligible persons. Children's Services (in the case of looked after children), the relevant supported accommodation provider (in the

case of the move on quota), or the professionals involved in a “special circumstances” case will be kept fully informed at all stages.

**25.6. Temporary/permanent decant tenant and non-statutory successors/occupiers holding over:**

Following a refusal of a reasonable offer by a tenant who needs to be decanted or by a person not entitled to succeed to a tenancy who the council has agreed to re-house, the relevant housing management officer will be advised so that they can commence possession proceedings (housing management teams will closely monitor such cases.)

**25.7. Emergency management transfer:**

Following a refusal of a reasonable offer by an emergency management transfer the housing assessment team will remove the priority status, place the tenant in the appropriate lower band, and inform the tenant and the relevant housing management officer.

## **26. Outgoing Mobility Nominations**

**26.1. The “housingmoves” scheme**

Harrow Council tenants wishing to move to another London borough will be advised of the “housingmoves” scheme and assisted, if necessary, to make an application. Housing association tenants will be referred back to their landlord to provide advice and support on *housingmoves*.

**26.2. Non-housingmoves mobility**

Members requesting re-housing in another borough which is not in the partners’ areas will be considered for nomination to another local authority or housing association, if they are eligible. The nominee will have to meet the criteria of the receiving authority, which sometimes includes needing to have a local connection with the borough they wish to move to. Older public rented tenants may qualify to be nominated to the Seaside and Country Homes scheme.

**26.3. Checking a borough’s willingness to accept a nomination**

Members meeting these criteria may have to complete an additional application form. The housing options officer will telephone the receiving organisation to find out if they will accept the nomination. The officer will let the member know in writing if their application is rejected.

**26.4. The nomination process**

If the receiving organisation is willing to consider the nomination, the housing options officer will make a nomination. Details are noted on the member’s file so that if they bid and are eligible for an offer via Locata a check is made, in order to avoid duplicate offers. If the nomination is rejected, this information is updated on the file. The officer will let the member know in writing whether or not the nomination has been accepted or rejected.



## Appendix 1 – Consultation on & context of this allocation scheme

In drawing up this scheme we consulted a range of stakeholders including:

- housing association (registered provider) landlords with which the Council has nomination arrangements
- statutory services
- Voluntary & Community Sector organisations
- Other Council services, including Adult Social Care and Children's Services
- Residents
- Councillors.

We have given due consideration to the council's powers and duties contained in the Housing Act 1996, the Homelessness Act 2002, related legislation and the Secretary of State's 2012 allocation of accommodation statutory code of guidance for housing authorities. We have also drafted and framed the scheme to ensure that it is compatible with the authority's equality duties under various pieces of legislation including the Equality Act 2010.

In accordance with the Localism Act 2011 we have prepared this scheme having regard to the council's homelessness strategy and tenancy strategy and the London Housing Strategy.

An equalities impact assessment for the scheme can be found on the Harrow website.

## Appendix 2 – Harrow’s strategic aims to which the allocation scheme contributes

**Table 8: Aspects of Harrow’s Housing Strategy to which the scheme contributes, additional to those set out in section 4 of the scheme**

Strategic aim	Example of how allocations policy can help
1) Prevent and tackle homelessness and rough sleeping	Ensuring that the priority scheme does not unintentionally offer an incentive to become homeless (e.g. by offspring asking their parent to exclude them).
2) Promote realistic housing options for people who need to move	Managing customer expectations by prioritising only those people who can realistically be re-housed with an acceptable wait and offering alternative housing solutions to those without priority.
3) Prioritise new homes for people living or working in Harrow	Ensuring, through the 5-year residence qualification, that priority for housing goes first to those with the strongest local ties to Harrow.

<p>4) Increase the supply of affordable homes to rent and buy</p>	<p>Giving high priority for a move to tenants who no longer need a larger home or no longer need disability adaptations so as to take full advantage of the potential offered by the new fixed term tenancies. Providing clear financial guidelines so as to ensure that tenants and homeseekers who have the financial wherewithal to move to shared ownership or to their own housing in the private sector are directed down that pathway rather than occupying scarce public rented units.</p>
<p>5) Meet the needs of older and vulnerable residents</p>	<p>Ensuring that, where older people, people with disabilities and vulnerable people with support needs can be assisted through an allocation of public rented housing to develop independence or remain independent for longer, or gain access to essential facilities, they are offered suitable housing.</p>

## Appendix 3 – Non-eligible people from abroad<sup>49</sup>

### 1. Applicants who are eligible

- a. UK national, Irish national or commonwealth citizen with the right of abode (all subject to the habitual residence test<sup>50</sup>)
- b. Person granted Exceptional Leave to Remain which is not subject to a condition of no recourse to public funds
- c. Person who has unconditional and unlimited leave to remain in the UK, is habitually resident in the Common Travel Area<sup>51</sup> and who is not sponsored
- d. Person who has been granted Humanitarian Protection
- e. Person who has been recorded by the Secretary of State as a Refugee
- f. Person not habitually resident in the Common Travel Area but who has rights of residence under European Law
- g. Person not habitually resident in the Common Travel Area but who is in the UK as a result of having been deported or expelled from another country
- h. Person not habitually resident in the Common Travel Area but who is fleeing from Lebanon or Zimbabwe (and other limited exceptions as from time to time decreed by the Secretary of State)
- j. Person whose only right to reside in the UK arises under European law allowing the minor of an European Economic Area (EEA) national to complete their education, providing that the child entered/ resided in the UK while the EEA national parent was exercising treaty rights
- k. Person who is already a secure, introductory, flexible or assured tenant of accommodation to which they have been nominated by a local authority<sup>52</sup>

### 2. Applicants who are not eligible

- l. Person subject to immigration control without the required leave to remain
- m. Illegal entrant
- n. Asylum seeker
- o. Person in the country on condition that they have no recourse to public funds
- p. Person from abroad who fails the habitual residence test (with some exceptions as listed above)
- q. Person from abroad who is in breach of the European Community Right of Residence Directive

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<sup>49</sup> The statutory framework for eligibility is subject to alteration by the Secretary of State and over-rides this allocations scheme if the latter is out of date

<sup>50</sup> Generally most people are not habitually resident for the first 3 months, but this might not be the case if a British citizen is resuming occupation. Whether someone is habitually resident depends on their main centre of interest and their individual circumstances. There is no legal definition.

<sup>51</sup> The Common Travel Area comprises the UK, Channel Islands, Isle of Man and Eire

<sup>52</sup> Existing public renting tenants are free to apply for a transfer regardless of their immigration status.

- r. Person whose only right to reside in the UK arises under European law based on their status as a job seeker or an initial 3 months right of residence
- s. Person from abroad who has been the subject of a sponsorship agreement for less than 5 years and whose sponsor is still alive
- t. Person with limited leave not granted as a result of a claim for asylum<sup>53</sup>

### **3. Restricted Cases**

Section 184(7) of the Housing Act 1996 defines those applicants, referred to as “restricted cases”, who are owed a duty under homelessness legislation because of the needs of someone in their household who is otherwise ineligible for housing assistance. Such applicants are not entitled to reasonable preference for public rented housing. If they are homeless the homelessness duty must normally be discharged by an offer of private sector housing.

If the restricted case meets the criteria of the council for medical, welfare or hardship priority, or for overcrowding or otherwise unsatisfactory conditions (see section 8.1 of this scheme: priority groups 2, 2A and 3), they will qualify to join the housing register and receive the appropriate banding applying to the level of need, so that they can be made an offer of public rented housing if it has not been reasonably practicable meanwhile to bring the homelessness duty to an end with a private accommodation offer.

### **4. European Union**

The UK ceased to be member of the European Union (EU) at 11pm on 31 January 2020. The Housing Allocation Scheme may need to be amended in due course as a result.

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<sup>53</sup> People with limited leave can apply directly to housing associations.

## Appendix 4 – Reviews

This appendix sets out the procedure for reviewing the following decisions:-

- Not to register someone who has applied for housing .
- To remove someone from Locata membership other than at his or her request.
- Other decisions relating to this allocations scheme, including banding, mobility group, assessed number of bedrooms and priority dates.

An officer senior to the officer making the original decision and who was not involved in making the decision will carry out these reviews.

### Procedure

1. A request for a review must be made within 21 days from the day on which the applicant is notified of the authority's decision and the reasons for it. The Council has discretion to extend the time limit if it considers this would be reasonable.
2. The officer carrying out the review will carry out an investigation in accordance with internal procedures and taking careful note of relevant legislative requirements, statutory instruments and codes of guidance. If not already received they will invite the applicant to make written representations or, if the applicant is unable to do this or would be disadvantaged by this method, the reviewing officer may hear oral representation. In some cases both written and oral representations may be allowed, and the applicant may appoint someone to act on their behalf in making them.
3. If the reviewing officer finds that the officer who took the decision did not take relevant information into account they will refer the file back to that officer for re-consideration of their original decision as part of the review process.
4. The reviewing officer will notify the applicant of their decision within eight weeks of the request for a review (although this time limit may be extended by agreement with the applicant).

### Outcome option 1: Original decision upheld

The review decision letter will give the reasons supporting the review decision. In cases of exclusion from registration or reduced or no preference banding the applicant will be advised (as appropriate) that:-

- (i) A fresh application will be considered if the applicant was ineligible due to being subject to immigration control and the applicant's immigration status has changed.
- (ii) Members/ex-members who have been excluded from membership on grounds of serious anti-social behavior must demonstrate good behaviour for at least a year (or more depending on how extreme the case was) before a fresh application will be considered.
- (iii) Members or any member of their household who knowingly gave false/misleading information or withheld information will not have a fresh application considered for at least one year (or more depending on how extreme the case was).
- (iv) Members who have assaulted a member of staff must demonstrate good behavior for at least a year (or more depending on how extreme the case was) before a fresh application will be considered.
- (v) When the member has paid off rent arrears, remedied damage, legal action has been withdrawn or they can prove that a local connection has been established they can apply to have their former priority reinstated or their application reassessed.

There is no right to request a review of the decision reached on this review, but the review decision letter will advise the applicant that they can seek legal advice on judicially reviewing the decision if they remain dissatisfied.

### **Outcome option 2: Original decision Quashed**

The review decision letter will explain what action the Council will take as a result and their reasons for doing so. The file will be sent back to the Housing Register officer for fresh enquiries to be made and a fresh decision issued. Applicants will be advised of their right to request a review of the new decision.

### **Outcome option 3: Original decision overturned**

The review decision letter will explain the new status of the application and the file will be returned to the Housing Register Team for the case to be updated (e.g. a new band to be recorded). In such cases applicants will be advised that the revised decision is not reviewable.

### **New information supplied**

If the applicant provides the reviewing officer with new information that was not known to the officer who took the original decision the review will take this into account as part of the review.

## **Appendix 5 – Procedure for assessment of medical, welfare and multiple need**

### **1. Who assesses & why**

All applications to Harrow Council for housing or transfer are automatically assessed via the on-line self assessment tool. In all cases claiming a medical or welfare need to move the auto assessment will be considered by an officer in the housing assessment team (HAT) in accordance with our published allocations scheme.

### **2. Priority in Harrow**

Those with a severe medical or welfare need to move are assessed as band A. Band A+ defines cases which warrant emergency status over and above the urgent priority given by band A.

*Those for whom the medical, welfare or overcrowding need to move is relatively mild, moderate, temporary or intermittent, do not receive priority under the Harrow scheme.*

The severity of cases is assessed according to the suitability of the current housing circumstances, not the clinical severity of the medical condition.

### **3. Procedure for applications presenting multiple needs**

3.1. When assessing an applicant who is in more than one of the reasonable preference categories, or where more than one member of the household has a medical, welfare or disability need to move, i.e.:-

- Homeless (no duty) or homeless (duty accepted)
- Living in unsatisfactory housing conditions
- With a medical, welfare or disability need to move
- Needing to move to a particular locality to prevent hardship the decision as to the appropriate priority band will depend on both the combination and degree of the various factors, with a view to ensuring that we give the greatest priority to those in the greatest need.

3.2. The Housing Register officer who assesses an application must always ensure that they discuss cases presenting possible multiple needs with a team manager. Multiple need does not always warrant a higher band. An applicant may present a number of less severe difficulties. It is quite possible for these to be assessed as sufficiently minor that the banding that would apply because of one of the needs is not justifiably lifted to a higher banding by the combination of the needs. For example, an applicant warranting band B because they are in need of sheltered accommodation might not be lifted to band A because of medical need. Each case is taken on its merits.



#### 4. **Mental health problems**

- 4.1. Mental illness can range from severe conditions such as bi-polar affective disorder, schizophrenia and post traumatic stress disorder to mild depression. Even severe conditions can often be under control through medication, so none of these conditions automatically confers priority re- housing status.
- 4.2. In many cases re-housing will not alleviate the mental condition of the applicant. It is always the effect on health of the current housing circumstances that we look at, not the medical condition itself.

#### 5. **Homelessness (duty owed)**

- 5.1. The banding of accepted homeless cases is defined within the scheme. If an accepted homeless household has a medical, welfare, disability or location need and has been placed in emergency accommodation, their needs will be taken into account in any offer of temporary or private sector accommodation which is made to them in order to ensure that the Council discharges its duty to find suitable accommodation.
- 5.2. When Harrow accepts a homelessness duty to a housing applicant and places them in emergency or temporary accommodation, any request by the applicant to have their banding reviewed will be investigated and considered by the responsible accommodation officer, who will then make a recommendation to a Team Manager to approve.
- 5.3. If, during the course of their homelessness assessment, or as a result of enquiries made during the council's continuing duty towards the applicant, it is found that there is severe social hardship even in the provided temporary accommodation, the applicant will be given band A or, if the need constitutes an emergency, band A+.
- 5.4. If their current accommodation is unsuitable because of medical, welfare, or disability need, but it is conceivable that suitable temporary accommodation could be found, the applicant will be given band A until either they are successful in bidding for permanent housing, or until we can locate more suitable temporary accommodation for the household, whichever is the sooner.
- 5.5. **Decision and convening of a panel** – All reassessed (homeless duty owed) cases will be reviewed and agreed by a team leader in both HAT and HPT. When both parties cannot agree they will convene a Panel meeting (comprising the two team leaders and chaired by the manager responsible for Housing Register assessment – or in their absence, another Housing Need Team Manager to discuss the case and decide the banding. All reassessed cases will be documented on a decision form, signed by both teams, and placed on file.

## 6. Criteria to be considered

In carrying out their assessment of a household's housing needs, in order to ensure that they give the greatest priority to those in the greatest need, the case officers will take into account such of the following matters as apply to the application concerned:-

- 6.1. any previous history of hospital admissions or incidents and the likelihood of further admissions
- 6.2. any relevant evidence as to whether there would be an adverse effect on the applicant of staying where they are and not being re-housed, and the likely extent and degree of any adverse effect
- 6.3. the number and severity of violence or harassment incidents against the applicant and the proximity of the perpetrator to the victim
- 6.4. any previous history of sexual abuse, rape, etc,
- 6.5. if the age, health and mental functioning of the person means they are less able to cope with, or remedy, their difficulties themselves.
- 6.6. minor medical problems that would not normally give any priority but which are combined with significant social difficulties
- 6.7. whether and to what extent the medical condition is controlled by medication and/or therapy
- 6.8. learning difficulties, even if mild
- 6.9. the extent to which any physical mobility difficulties are exacerbated by the current housing, for example where it causes the person to be unable to leave the building to carry out normal daily activities
- 6.10. the context, such as the number of people in the household, their ages and relationships, details about the accommodation occupied and its landlord, whether the household owns a car, the level of financial assets, and details of who provides day to day support to the household and where they live.

## 7. Types of report that may be relevant

- 7.1. **Self assessment** – In cases of medical or welfare need (or any claim for higher priority) we normally expect to see a letter or application statement from the applicant giving a clear picture of the impact of their housing circumstances on their everyday life. Equally acceptable would be a letter from an advocate such as Harrow Association for the Disabled, Harrow Mencap, Harrow Housing Advice Centre or the applicant's solicitor, friend or relation, provided such letters

are accompanied by authorisation from the applicant.

7.2. **Professional assessment** – However, in addition to this self-assessment, we normally expect to see professional evidence relating to the applicant's claim for priority, such as one or more of the following:-

- Medical – Normally a consultant's report will be required, although reports from two or more of the following may carry sufficient weight if together they give a clear and informative picture of the difficulties being experienced by the patient in their home. A GP's letter on its own, simply stating the applicant's medical condition and their wish to move does not constitute proof of a medical need to move, especially where it is not clear that the housing conditions are having a severely adverse effect on the applicant's medical condition.

Other medical sources of information: G.P., health visitor, community mental health nurse, occupational therapist or fieldworker.

- Social services – key social care worker, supported housing worker, education welfare officer.
- Housing management – housing officer, anti-social behaviour co-ordinator, tenancy arrears officer.
- Crime agencies – Victim support, probation officer, police.

## 8. **Decision**

- 8.1 The case officer should make a file note on any multiple needs case to explain how they have taken the multiple needs into account in their assessment, and summarising why they have decided no significant housing need & therefore disqualified, band C or band B. If they consider that band A or A+ is warranted they will make a recommendation to a team manager in HAT who will agree the recommendation or give guidance to the case officer as to why they disagree.
- 8.2. The team manager can either over-ride the recommendation or specify the additional evidence that the case officer needs to obtain before the correct assessment decision can be reached. The HAT team managers also review a sample of cases where case officers are not recommending that the banding be raised, to ensure that they are taking consistent decisions.
- 8.3. A small sample of cases is reviewed by the service manager responsible for housing assessment on a regular basis in order to ensure that consistent decisions are being taken by team leaders.
- 8.4. Applicants are advised that they can request a review of the banding if they disagree with the assessed level of priority, and the review will normally be carried out by the Reviews Officer, who reports regularly to the service manager responsible for housing assessment with a view to ensuring consistency of

decisions.

## 9. Multiple needs examples

9.1. Where an application is received that has a combination of defining features or multiple needs, the housing options officer assessing the case must consider whether the applicant has “emergency medical need” or “emergency severe need” (band A+) or “medical hardship” or “severe social hardship” (band A).

9.2. Common examples of such circumstances are as follows, but please note that this list covers typical and common cases and the considerations that need to be addressed and is not intended to be an exhaustive list of the types of multiple need that occur:-

- A family living in public rented housing which is overcrowded (i.e. at least 2 bedroom deficient) gets band A. However the household may also include a member with a medical condition. An assessment is made as to whether the overcrowding is also affecting the medical condition to an extent that is so exceptional as to warrant **emergency** priority (band A+ medical).
- A family living in public rented housing which is overcrowded (i.e. at least 2 bedroom deficient) may have particular welfare needs, e.g. child protection, which are exacerbated by the overcrowding. In this case an assessment is made as to whether the level of overcrowding is contributing to the risk to the welfare of the family to an extent that is so exceptional as to warrant **emergency** priority (band A+ severe need).
- A family where more than one family member has a medical condition, none of which individually is sufficient to warrant medical priority – hence disqualified. A view is taken as to whether the family’s cumulative need makes their current accommodation so unsuitable as to warrant **medical** priority, and thus band A medical.
- An adult couple who both have learning difficulties, where the Care Plan of each person requires their re-housing (band A). A view is taken as to whether the couple’s cumulative need is so exceptional as to warrant **emergency** priority, and thus band A+ severe need.
- Unsanitary conditions in the property leave the applicant or a member of their household, with a medical condition, at increased risk of infection. If the situation is exceptional, and irremediable within 6 months, **emergency** priority, and thus band A+ medical, would be warranted.
- The applicant or a member of their household is unable to mobilise adequately in their accommodation and this is exacerbated by the lack of opportunity to provide the necessary adaptations (e.g. because of landlord opposition) and/ or the inability of the person to leave the property. If the situation is exceptional **emergency** priority, and thus band A+ medical, would be warranted.

## Appendix 6 – Verification

**All members must have their circumstances and housing conditions verified before they will be eligible to sign up for a secure or assured tenancy. There must be an up to date verification on file within 6 months of a tenancy offer, or 12 months in the case of social housing tenants and older residents moving to specialist schemes for older people. Verification may include a home visit where appropriate.**

All members will be required to provide the following documents:-

- Proof of identity and residence for all persons included on the application
- Proof that they are still eligible persons
- Proof of benefits being received
- Other proofs as appropriate.

Following verification the case officer will amend and update the application as appropriate ensuring that all necessary information is noted on the system. Where it is not possible to complete verification (for example because we are unable to confirm that the applicant actually lives at their stated address) the member will not be allowed to sign up for the tenancy, even if they are the top bidder for the property.

If it is confirmed following verification either that the member is ineligible for an offer or should be excluded from the scheme a case officer in the housing assessment team will write to them, giving reasons for the decision and advising them of their right to request a review of the decision (see appendix 4, Reviews).

### Sensitive Lettings

If the property to be let has been designated a sensitive letting, as described in section 17.6, the verifier will need to confirm that neither the prospective tenant nor any member of their household has:

- a history of anti-social behaviour or nuisance a history of drug or alcohol misuse
- a history of drug-dealing
- caused housing management problems in previous accommodation, including emergency and temporary accommodation.

### Affordability

For many households that rely on benefits, especially those with large families, living in London, even in public rented housing, may be unsustainable in the longer term. Applicants who are found at verification stage to be unable to afford the rent will not be made the offer of accommodation. Whether the accommodation is affordable will be determined taking account of the financial resources available to the household and the level of rent for the accommodation.

## Home visit

Members placed in band A and A+ and those members in band B who have been waiting the longest will be visited, unless their circumstances have already been verified by homelessness investigations. All those who are likely to be made an offer will be visited if they have not been visited within the last 6 months (12 months in the case of social housing tenants and older people bidding for specialist older people's schemes), unless a manager in the housing needs team deems a desktop check to be sufficient. One of the responsibilities of the visiting officer is to check that the correct banding has been applied to the case, so as to ensure that allocations are made to those with the highest level of need.

Homeless and formerly homeless households living outside the M25 may not need a home visit, although the continuing priority need of formerly homeless applicants will need to be confirmed. Such homeless applicants, and formerly homeless applicants who took a qualifying offer, who are accommodated outside the M25, cannot be verified if they give up employment in order to take up an offer of housing in Harrow.

At the home visit previous addresses and the reasons for leaving will be investigated to determine whether the applicant lost their accommodation by doing or failing to do something. This will include where the applicant is a former tenant of a social landlord and was evicted because of a breach of tenancy agreement or is a former council tenant with rent arrears.

If the visit takes place at the beginning of the application process the visiting officer explains the scheme fully to the member, stressing that **they will not be able simply to wait for the council to make them an offer – they must actively bid for homes if they are to be re-housed**. They will also ascertain whether the applicant will need any assistance such as interpretation, help with bidding or advice on their housing options.

## At the point of offer

If the visit takes place at the point of offer the visiting officer will advise the member to bring original documents into the Housing Department within the next few days if they have not been able to produce them at the visit, in order for verification to be completed.

## Desktop check

We will also check credit rating agencies and the land registry, wherever possible, to determine whether the applicant has accommodation available to them elsewhere and whether they have undeclared sources of income or savings.

## **Visit Report**

The visiting officer completes a housing visit report and places it on the file, and makes recommendations, if appropriate, to the officer who requested the visit. If the case cannot be verified, e.g. because the visiting officer was unable to find the applicant at home and could not satisfy themselves that the person was living there in the circumstances described, or because the applicant failed to supply documents when requested, the case will be demoted to band C until the required information is forthcoming. The case officer in HAT will update and reassess the application, amending the band, if necessary, make any further enquiries and request any further documents needed. The case officer will refer the case to the reviews and fraud officer and/or a team leader if the applicant has given false or misleading information or has withheld information.

## **Deadlines**

We are required to verify applicants who have successfully bid on other Locata partners' properties within 72 hours of receiving a verification request and, at the latest, within 24 hours of an offer being made.

## **Appendix 7 – Procedure for assessment of non- statutory succession/ occupiers holding over/**

### **Applications for Succession**

When a tenant dies, and remaining occupants of the property apply to take on the tenancy but are not legally entitled to succeed to the tenancy, the housing management officer for the area will interview the applicant(s). The housing management officer will then submit a report to the Housing Assessment manager for their recommendations, taking into account:

- The applicant's relationship to the former tenant(s)
- The age of the applicant and any disability, medical or social factors
- The length of time they have lived with the departed/ deceased tenant
- Their ability to finance accommodation in the private sector
- Whether the person would have priority need if they applied as homeless
- Whether the person meets the current "positive residence test" (see below)
- Any other relevant considerations

The final decision is taken by the Senior Professional, Resident Services.

### **Occupiers Holding Over**

In any case where a tenancy is due to end or has been ended by the tenant(s) serving Notice to Quit or a Surrender, the housing management officer for the area will interview anyone in occupation after the tenancy has ended or expected to be in occupation when the tenancy ends, and who makes an application for continued accommodation. The housing management officer will then submit a report to the Housing Assessment manager for their recommendation, taking into account:

- The applicant's relationship to the former tenant(s)
- The circumstances in which the tenancy ended
- The age of the applicant and any disability, medical or social factors
- The length of time the applicant has lived at the property
- Their ability to finance accommodation in the private sector
- Whether the person would have priority need if they applied as homeless
- Whether the person meets the current "positive residence test" (see below)
- Any other relevant considerations

The final decision is taken by the Senior Professional, Resident Services.



## The application process

Unless there is good reason to exempt an applicant, applications to take on someone else's tenancy, whether deceased or vacated, should be made using the online application, a standard format that helps to ensure that we assess the housing need element consistently. The housing management officer, upon receiving a request to take over a tenancy, should advise the applicant of how to make an online application.

Where, following reasonable attempts to interview an applicant, the applicant does not meet the housing management officer, or where they fail to provide on request sufficient information, the report should be submitted based on what information is known.

## Decision options on applications from Non-statutory Successors and Occupiers Holding Over

1. **Offer the tenancy of the existing property** – the housing management officer will make arrangements to sign them up.
2. **Offer the tenancy of a smaller, non-adapted, or other type of property** – the housing management officer will advise the housing options team that the applicant has been approved for band A+ priority on Locata. The housing management officer will give the decision in writing to the applicant advising them that they have a right to appeal against the decision to the Head of Resident Services. Both the Housing Register officer and the Housing Management officer will advise the applicant that they have a limited period from date of registration to exercise choice by bidding for appropriate properties. The usual guidelines for time limited bidding are 3 to 6 months, but in the case of a property that has more than 1 bedroom or where there is a particular requirement such as ground floor or mobility adaptations the housing management officer should check with the housing options team in order to give a reasonable deadline. If they fail to secure accommodation within the given period they may be made one direct offer only in line with current policy. If they refuse this offer possession proceedings will be commenced (the housing management team will closely monitor this)
3. **Not to offer re-housing** – the housing management officer will write to the applicant advising them that they have a right to appeal against the decision to the Head of Resident Services, initiate possession proceedings and refer the applicant to the housing advice service to explain how to move in the private sector. The housing management officer's letter will also advise the applicant of the reason for the decision and that, should they experience a significant change in their circumstances, they may request us to look at the decision again (e.g. if the decision was made on solely on the basis that employment income was sufficient to afford shared ownership, and the applicant loses their job).

## Current positive residence test

- No ongoing culpable involvement in anti social behaviour
- No outstanding debt over £100 to the council or a partner housing association
- No breach of council or housing association tenancy (within last 5 years)
- No serious offence within last 5 years

## Appendix 8 – List of tables in the scheme

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## Appendix 9 – Financial resources

### Assessment

If an applicant has sufficient financial resources to resolve their own housing need, or they unreasonably disposed of financial resources that could have enabled them to purchase/obtain their own accommodation, or they own other accommodation, they will be assessed either as:

- Disqualified, but able to access alternative housing options

or, in exceptional circumstances:

- Higher priority (e.g., elderly owner occupiers who cannot stay in their own home, cannot sell it, and need to move into sheltered accommodation).

### Financial Assets

All households applying for housing will be assessed for their ability to buy a property within the Borough. This will include applicants who have been accepted under homelessness legislation and to whom the authority owes a duty under sections 193(2) or 195(2). Assets that may be taken into consideration include but are not limited to savings, bonds, commercial property, residential property, property abroad and money apportioned through the proceeds of a divorce settlement. Other valuables owned (e.g. cars) may also be taken into account. Asset assessments will be conducted at the time of application and also before any offer of public rented housing is made.

### Property owners

We will not make an allocation where any applicant owns or part owns a property that they can live in (even if they are not currently living in it) or where, if they sold it, they could afford to buy another property. Property ownership, or a share in a property, where the value of the share is greater than the savings limit, will count as “above benchmark” financial resources. We may make exceptions to this rule in the case of vulnerable older people who have substantial or critical care needs.

If an applicant owns a share in a property but is unable to live there, for example, if their relationship has broken down, we will assess their financial circumstances on the basis of the money that could reasonably be expected to be released if the property were sold.

In determining whether an applicant is eligible to receive an allocation of housing, the Council will consider the following:

- Whether the applicant can sell their current home.
- The expected equity after the proposed sale of the property.
- The applicant’s current financial circumstances and commitments
- Whether the applicant will be eligible for a mortgage.
- The supply of economically realistic accommodation suitable for the applicant’s specific needs on the private market for either sale or rent
- Whether the applicant’s housing need can be met in the private market, taking into consideration the cost of housing in and outside of Harrow.

- Whether adaptation of the present property is a viable option. Whether significant care and support needs would impact on the ability of the applicant to secure and maintain accommodation.

Where the Council agrees to assist a home owner with re-housing, the applicant must undertake to place their home on the open market immediately. They may not rent their home or make any financial gain while waiting to sell.

### Savings

Any applicant with savings over £30,000<sup>54</sup> (in line with the threshold for child tax credit qualification) will not be eligible for public rented housing as they will be deemed to have enough financial resources to rent in the private sector. Deliberate disposal of assets in order to become eligible for an allocation will disqualify an applicant.

### Income

Applicants with gross incomes (including notional income from capital assets but disregarding disability benefits) in line with or above the income required for low cost home ownership (including shared ownership<sup>55</sup>) properties by bed size will not be offered public rented housing. This is because they are deemed to have sufficient financial resources to enable the applicant and their household to find other suitable accommodation. The following household income eligibility limits are an absolute income cap; that is anyone earning above these limits (including notional income from capital assets but disregarding disability benefits) would be expected to move either to rent or buy independently.

Maximum joint household income to qualify for public rented housing	
0/1 bed	£50,000
2 bed	£65,000
3 bed	£75,000
4 bed+	£90,000

<sup>54</sup> The figures are as of Dec 2020. The Council will review the financial limits at least every two years, to consider if they still apply, and will take into account any significant changes in: house prices in the borough, income level, the availability of affordable home ownership properties and private rents.

<sup>55</sup> There is no set minimum income requirement for shared ownership. Each property will be valued individually and the registered provider will determine the minimum income required for that property to be affordable. There is a maximum income threshold of £90,000 in London. The applicant will usually need a deposit of 5-10% of the equity share that they are buying. If they have a large cash deposit this may reduce the income required. They will usually need at least approx £4,000 - £5,000 to pay for the costs of buying a home, though this will depend on the home and options that they choose. Welfare benefits will not be included as income when assessing affordability so they are unlikely to be able to secure a mortgage and be accepted for shared ownership. If they have a poor credit history they may not be able to secure a mortgage and they may not be able to proceed with shared ownership. Visit the Low Cost Home Ownership page on the Harrow website at [www.harrow.gov.uk](http://www.harrow.gov.uk) for more information

### **Important Note**

Intentional unemployment in order to become eligible for an allocation will disqualify an applicant. The Council will not make an allocation where, upon verification, we determine that an applicant can afford a mortgage to buy or part-buy a property by using their assets and income.

In assessing “intentional deprivation of assets” the council will follow Department for Work and Pensions (DWP) guidelines wherever possible.

## Appendix 10 – Housing application assessment process

### Registration

If the officer assessing the incoming application is satisfied that the applicant is eligible for housing they will make an initial assessment based on the information on the application form and any other information available, usually within 28 days. In some cases the application may be activated automatically from the information given on the form. If the application does not qualify for registration, the applicant will be sent a LIN number and a letter explaining the reason(s) for disqualification and, if the applicant lives in Harrow, how to access targeted online housing options and advice, as stated in sections 7.7 and 7.8 of the scheme. If the application does qualify for priority on the scheme, the system or the officer will register the application in the appropriate bedroom category and in one of the five priority bandings with the priority date being the date of registration. If, in order to confirm high priority, they need to check identification documents or supporting information such as medical evidence, or carry out a home visit, they will do this before registering the application, so these cases may take a little longer. We will write to applicants to tell them if their assessment is likely to take longer than 28 days and the reasons for it.

### Decision letter

We write to all those who have been assessed as eligible with:

- the Locata Identification Number (LIN)
- the assessed band and the reason for it
- the right to request a review if you consider any of your registration details to be inaccurate (see Appendix 4 for review procedure)
- how to access alternative housing options via the Locata website.

In addition, if assessed as band A+, A, B, C or C- (initial preference), we advise the applicant of:

- how to bid for homes using the Locata website the priority date
- the maximum bed size for which the applicant can bid mobility group (physical disability level) if applicable

The preferred means of communication as stated on the application form will be used to communicate with the applicant (i.e. e-mail or posted letter).

### Banding appeal

If the applicant does not agree with their band or priority date they should first discuss the matter with a housing options officer, whose job it is to make sure that applicants fully understand how their banding has been assessed. It may be, for example, that we need more information in order to make a more accurate assessment. If the applicant remains dissatisfied with the decision they have a right to ask for a review to be carried out by our reviewing officer, who is someone senior to the person who made the decision and who was not party to making that decision. Before asking for this, however, we make applicants aware that the reviewing officer has the authority to lower as well as increase a band (see Review Procedure at Appendix 4).

### **Keeping an application up to date**

Applicants must keep the housing department informed of any changes in their circumstances, e.g. when they move house, have a baby, or someone leaves or joins their household by logging into their Locata account and completing an online change of circumstances form. If this results in a band change we will inform the applicant in writing of the new band, the reason for it and the applicable priority date, and of their right to request a review of the decision (see Appendix 4 on the review procedure). Failure to tell us about a change in circumstances which would boost priority means the applicant may miss out on an offer of housing. Conversely, failure to advise us of changes (such as a member of the household leaving) may result in an offer being withdrawn on the basis that we gave a higher priority than the applicant was entitled to.

### **Checks before offers of housing**

*We always carry out a full verification check before confirming any offer and allowing a tenancy sign-up to take place. See Appendix 6 which explains the verification process.* If, as a result of our inquiries, we believe that an applicant has knowingly withheld information with the intention of obtaining a public rented tenancy we may decide to prosecute for fraud.



## Appendix 11 – Debts and arrears policy

### All applicants

No offer will be made to an applicant, even one who is owed the statutory reasonable preference, who owes the council or a partner housing association money (either rent, service charges, council tax or any other debt) and has refused to make, or has failed to keep to for a minimum of 6 months, an agreed repayment arrangement to repay the debt and has not paid off at least 50% of the original debt.

### Accepted Homeless Households in temporary accommodation

Homeless households in Council-provided temporary accommodation will be advised that, if they fall into rent arrears, their bids on Locata will be rejected until such time as the arrears are cleared or an agreement has been reached to clear the arrears and this agreement has been kept to for at least 6 months and at least 50% of the original debt has been paid off

This policy will also apply when the applicant either:

- refuses to pay the rent, or
- fails to make a commitment to repay arrears, or
- fails to provide supporting information for a Housing Benefit claim.

Depending on the amount of the arrears and the nature of the agreement, discretion will be exercised to review cases and make the applicant eligible for an offer earlier or later than six months. Exceptions can be agreed by a team leader in the housing needs team to this policy, particularly for those cases in bands A+ or A.

### Tenants

Tenants, like homeseekers, are allowed to be members of Locata even if they have rent arrears. However, at the time that they bid for a property they must have a clear rent account. Their bids on Locata will be rejected until such time as the arrears are cleared or an agreement has been reached to clear the arrears and this agreement has been kept to for at least three months. Consideration will be given to varying this rule where other exceptional circumstances apply such as:-

- Tenants with rent arrears and urgent management, medical or social hardship priority in band A+ or A may be transferred at the discretion of the service manager responsible for tenancy management. In most cases, tenants will be less than 10 weeks in arrears or on Housing Benefit and have been reducing the arrears regularly for at least six months, or the urgency of the case is considered to warrant a move despite the arrears
- Tenants who need to move because they are underoccupying their current home or where a permanent decant is essential may be transferred despite rent arrears. Tenants in arrears who qualify for a tenants' underoccupation incentive payment will be transferred with the payment offset against the arrears.

## Appendix 12 Processing applications from people over 60 years of age

Members may indicate on the application form if they wish to be considered for sheltered accommodation. Relatives, social workers, or doctors may also refer them, or the Council's Medical Adviser may recommend sheltered accommodation.

Following registration a home visit is arranged for verification (see **appendix 6, Verification**).

The sheltered assessment officer will carry out a Sheltered Assessment, setting out, in detail, the member's ability to manage independently, any medical problems and how these may affect day to day activities, their present living conditions and any difficulties experienced in the accommodation.

At the home visit the member is asked if they are interested in other Locata partners' areas or in other areas of London or the country.

The sheltered assessment officer evaluates the Sheltered Assessment, taking into account the advice of the Council's medical advisor if applicable, and recommends that the applicant is either suitable or not for sheltered accommodation. Those who appear to need a higher level of support and or care are referred to the Social Services Elderly Care Management Team for an assessment of their suitability for extra care sheltered housing or Residential Care.

Members assessed as suitable for sheltered accommodation will be placed in the following Sheltered housing priority bands based on their need:

- A) Urgent Priority
- B) Standard Priority
- C) Out of Borough Applicants

If members express an interest in sheltered accommodation outside west London, following agreement the completed assessment is sent to the relevant authority to decide if they are able to assist.

The Housing Register officer will advise members about Locata and explain how to bid and, if the person needs it, bid for properties on their behalf.

Elderly members who do refuse to consider sheltered accommodation will be disqualified unless they qualify for a higher band for other reasons.

## **Appendix 13: Legally not defined as lettings and therefore not necessary to be covered by the allocations scheme**

1. An offer of accommodation to a tenant of Harrow Council who does not meet any of the grounds for priority in this scheme (such lettings will be very infrequent and justification for any such lettings will be noted on the tenancy file).
2. Statutory succession and assignment of a tenancy to the successor on the tenant's death (the procedure for making a non-statutory succession decision is described in appendix 7).
3. Assignment of a tenancy by way of mutual exchange.
4. Transfer of a tenancy by Court Order under family law provisions or under the Civil Partnership Act 2004.
5. Council initiated transfers (e.g. decanting to alternative accommodation to allow for major works to take place). Permanent (but not temporary) decants are normally done through the allocations scheme, but do not have to be if it is in the council's interest, especially in cases where the applicant refuses to co-operate in making an application to move.
6. Re-housing required because the council is displacing a person from their accommodation or needs to re-house them pursuant to the Land Compensation Act 1973.
7. A person being granted a family intervention tenancy.
8. Provision of non-secure temporary accommodation in discharge of any homelessness duty or power.
9. Lettings made by housing associations outside their nomination agreements with the council.
10. Allocations to individuals subject to the Multi Agency Public Protection (MAPP) arrangements (although we will usually assess according to the priorities set out in the scheme and make the person a direct offer, as per section 23 of the allocations scheme).
11. Offers of tied accommodation to council employees.
12. Urgent management transfer cases (although we will allow such cases to exercise choice wherever practical before making them a direct offer, as per section 23 of the allocations scheme).
13. Contractual duty to re-house council employees in tied accommodation (although we will allow such cases to exercise choice wherever practical before making them a direct offer, as per section 23 of the allocations scheme).

## **Appendix 14 – Lettings to staff, Board members of relevant organizations, council members, and relatives**

The following procedure must be undertaken to ensure that any lettings can be justified under a high level of scrutiny.

1. The housing applicant must have no direct input into any decisions about their re-housing. This includes no inputting of any data about their application into the housing needs databases nor assessing their own level of priority.
2. Staff members must not have any involvement in the inputting of application data or assessing priority for a relative.
3. Applications should be clearly marked on the housing databases that this is a staff member, board member, councillor or relative of any of these. The team leaders in the housing assessment team will keep a confidential record of all such marked applications.
4. When such an applicant has bid for a property and is showing near the top of a bidding list, or is to be made a direct offer, a “record of interest” note must be completed and signed off before any offer is made. The details of the offer must be scrutinised and signed off by the service manager responsible for housing assessment or housing provision.
5. Attached to the note must be copies of the computer screens of all appropriate information, including the Locata advert, the date the property was advertised, the shortlist from which the applicant is being offered, and any policy evidence for any applicants above them not being made the offer.

## Appendix 15 – Table of bands, band reasons, priority dates, time limits and refusal consequences

Reason for band A+	Description of band A+ priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
<b>Band A+ Emergencies and underoccupiers</b>				
<b>Guideline waiting time: 0 bed &amp; sheltered = 2 months, 1 bed = 3 months, 2 bed = 4 months, 3 &amp; 4 bed = 6 months</b>				
Emergency medical (group 1 emergencies)	Exceptional circumstances when the applicant or a member of their household has a life threatening condition which is seriously affected by their current housing. OR: Housing conditions and/or other circumstances are having such a major adverse effect on medical condition or disability of the applicant or a member of their household as to warrant emergency priority	Date approved as an emergency	We expect most medical & welfare emergencies to be re-housed within 3 to 6 months maximum. If there is a failure to bid, failure to attend a viewing or a refusal of a reasonable offer, one direct offer of housing will be made (see section 23)	Downgrade to band A if direct offer is also refused (groups 1 & 2).
Severe need (group 2 emergencies & group 21)	Exceptional circumstances and/or multiple needs which warrant emergency priority, including risk of imminent significant harm to children or vulnerable adults.  Ex-service personnel who qualify in band A, if they have urgent housing needs.			
Emergency management transfer ( <i>transfers only</i> ) (group 12 emergencies)	Exceptional circumstances because of significant and insurmountable problems associated with the tenant's occupation of the home <i>and</i> imminent personal risk to the tenant or a member of their household if they remain there (e.g. because of harassment). These transfers will be to properties of the same size and type (i.e. management transfers are always "like for like" – i.e. same number of bedrooms and flat to flat or house to house)			(Management transfers group 12) downgraded to band C if direct offer is also refused.

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Reason for band A+	Description of band A+ priority reason	Relevant priority date	Time limits for	Consequence of Refusal
Enabling adoption or fostering (group 10)	Where agreement has been reached to provide public rented housing on the recommendation of Children's Services as suitable to adopt or foster one or more children. In order to do this they need more appropriate housing but do not have the means to source the accommodation themselves. In these cases we will offer flexible tenancies which are unlikely to be renewed if fostering ceases.	Date of approval/referral.	Normally 3 – 6 months. We will make a direct offer if there is a failure to bid, view or accept offers	Downgrade to band C if direct offer is refused
Under-occupation ( <i>transfers only</i> ) (group 7)	Applicant is willing to move to a property with fewer bedrooms or needs to downsize because their home is no longer affordable. They <i>may</i> be eligible for the Under-Occupation Incentive Scheme <sup>56</sup>	Date applied to downsize	No time limit	No refusal penalty <sup>57</sup>
Tenancy succession/occupiers holding over (group 11)	Those without a right of succession and those occupying property of which they are not the tenant, if approved jointly by the tenancy management and housing assessment service managers for an offer of suitable alternative housing (see Appendix 7 on the assessment process for this).	Date approved for re-housing	We will make a direct offer if there is a failure to bid, view or accept offers	Possession proceedings will be commenced usually after 3 - 6 months

<sup>56</sup> If the applicant requests we may be able to re-house them and their adult child separately (for example if they need 2 bedrooms and live in a 3-bedroom home we could re-house in two separate 1-bedroom homes and give the tenant underoccupier priority for giving up 1 bedroom)

<sup>57</sup> If the applicant is moving because of unaffordability (because of the "bedroom tax" for public sector tenants on benefit) and gets into arrears, or their arrears increase, following a refusal or failure to bid, one direct offer will be made and notice of seeking possession issued if this is refused. Priority will remain A\* until re-housed, evicted, or the arrears are cleared

Reason for band A	Description of band A priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
<b>Band A Urgent and high priority cases</b> <b>Guideline waiting time: 0 bed &amp; sheltered = 4 months, 1 bed = 6 months, 2 bed = 1 yr, 3 bed = 2 yrs, 4 bed = 3 yrs</b>				
Medical hardship (group 1)	<p>Other than emergencies and cases of exceptional multiple need, reasonable preference for housing will only be given where current housing conditions are having a <i>major</i> adverse effect on the medical condition or disability of the applicant or a member of their household.</p> <p>N.B. Medical priority will not apply where the effect of housing conditions on health is comparatively moderate, slight or variable, because the prevailing housing conditions in Harrow find many people in that position without a need for public rented housing being</p>	Date medical information submitted that warrants a band A assessment.	Time taken to re-house will vary according to bed size & adaptations needed – not normally longer than 3 yrs in band A	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will result in downgrade to band C.
Severe social hardship (group 2)	<p>Multiple welfare needs that warrant high priority.</p> <p>Social care services or police/ probation or other welfare agency referral agreed by a housing assessment team leader for an urgent move in order to give or receive care and support as part of a care plan, because of a risk to a vulnerable person's independence in the current accommodation, or other social welfare reasons.</p>	Date all relevant information submitted that warrants a band A assessment.	In cases of risk of harm we will make a direct offer if failure to bid, view or accept offers.	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will mean downgrade to band C

Reason for band A	Description of band A priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
Overcrowding and high priority hardship (transfers only) (group 3)	<p>Overcrowding - reasonable preference for housing will only be given where overcrowding is severe, as defined in Section 21.2. This is because, in the prevailing housing conditions in Harrow, many people lack a bedroom without a need for public rented housing being indicated.</p> <p>High priority hardship -with dependent children and living in insecure accommodation with no bedroom and lacking or sharing amenities.</p>	<p>Date the tenant became severely overcrowded<sup>58</sup>.</p> <p>Date all relevant information submitted that warrants a band A assessment.</p>	We will review any case not re-housed within the expected timescale.	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will mean down-grade to band C.

<sup>58</sup> The date cannot precede the date the applicant actually made a transfer application.



Reason for band A	Description of band A priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
Statutory overcrowding ( <i>transfers only</i> )	Statutorily overcrowded as defined in Part X of the Housing Act 1985, the proviso that household members over 20 will not count towards the assessment unless they are giving or receiving care (see section 21 on overcrowding) OR Court order to re-house	Date the tenant became statutorily overcrowded or court order issued	We will make a direct offer if there is a failure to bid, view or accept offers	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will result in downgrade to band C.
Unsanitary conditions	The applicant lives in a private sector property that the council's environmental health team has determined poses a category 1 hazard under the Housing Health and Safety Rating System and the council is satisfied that the problem cannot be resolved by the landlord within 6 months, and that continuing to occupy the accommodation will pose a considerable risk to health of the applicant or one of their household.	Date the applicant reported the property to Environmental Health	We will review any case not re-housed within the expected timescale	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will mean downgrade to band C.

Reason for band A	Description of band A priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
Releasing adapted property or making the best use of adapted stock ( <i>transfers only</i> ) (group 9)	<p>At the council's discretion where there is an unmet need for the property occupied – e.g. where the tenant does not require walk-in shower or other wheelchair accessible features.</p> <p>Where the current property needs major adaptations in order to meet the household's needs and it is in the council's interest for the tenant to move.</p>	Date of transfer application or date the occupant with a disability deceased/ moved out.	We will review any case not re-housed within the expected timescale for the bed size.	No refusal penalty unless a direct offer is made to a tenant who needs adaptations, in which case demotion to band C will be considered.

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\*Provided Harrow has not decided to refer to another authority under S.198 of the 1996 Housing Act.

◆The date cannot precede the date of the homeless application unless the applicant already had band A for some other reason when they started working full time.

Reason for band A	Description of band A priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
Council interest transfers - Permanent decants (group 13) - Non-emergency management transfers (group 12) - Service tenants (group 14)	<p>Decanting needed from a property imminently required because of lease expiry or for essential works and the tenant will not be returning (e.g. development schemes)</p> <p>Agreed by the service manager for tenancy management for non-emergency transfer. These transfers will be to properties of the same size and type ("like for like" – see Section 19.3)</p> <p>Ex-service tenants (e.g. caretakers and sheltered wardens) where the council has a contractual obligation to re-house.</p>	Date approved for re-housing	We will make a direct offer if there is a failure to bid, view or accept offers, or if there is a need for the property to be handed back before bidding is likely to be successful	Possession proceedings will be commenced usually after 3 - 6 months
Ex-tenant discharged from institution (group 15)	Where a commitment has been made in order to get a tenant to relinquish their public housing tenancy on entering an institution such as a prison or nursing home. The priority will normally only be given for studio and 1-bedroom properties.	Date of application	Normally 3 – 6 months. We will make a direct offer if there is a failure to bid, view or accept offers	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will result in downgrade to band C.

Reason for band A	Description of band A priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
Young people leaving care move-on quota (group 16)	Approved for move-on by Social care Services as part of their annual fixed quota of studio and 1-bedroom properties, provided they meet the eligibility criteria set out in appendix 3.	Date put forward to Housing for the quota	Normally 3 – 6 months. We will make a direct offer if there is a failure to bid, view or accept offers	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will result in downgrade to band C.
Supported housing move-on quota (group 17)	Approved for move-on by the Supporting People Move-On panel (comprising representatives of council accredited supported schemes) as part of their annual fixed quota of studio and 1-bedroom properties.	Date of panel meeting		
Move-on from residential care (group 18)	Where agreement has been reached to provide public rented housing on the recommendation of a Social care service or equivalent that the person is able to live independently.	Date all relevant information submitted to support suitability for independent living.	Expected to bid regularly and move fairly quickly or risk being downgraded to reduced preference band C	
Older people approved for sheltered accommodation (group 19)	Applicants (usually 60 years+, but exceptionally 55 years+) who are assessed as likely to benefit (e.g. by retaining their independence for longer) from sheltered or other specialist older people's accommodation where there is an urgent need to move.	Date of registration or becoming eligible for older people's housing, whichever is the later	Expected to bid regularly and move fairly quickly or risk being downgraded to reduced preference band B	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will result in downgrade to band B.

Reason for band B	Description of band B priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
<b>Band B Standard priority</b> <b>Guideline waiting time: sheltered accommodation 1 year</b>				
Older people approved for sheltered accommodation (group 19)	Applicants (usually 60 years+, but exceptionally 55 years+) who are assessed as likely to benefit (e.g. by retaining their independence for longer) from sheltered or other specialist older people's accommodation where there is a need to move.	Date of registration or becoming eligible for older people's housing, whichever is the later	Expected to bid regularly and move fairly quickly or risk being downgraded to reduced preference band C	Failure to bid, failure to attend a viewing or a refusal of 3 reasonable offers will result in downgrade to band C

Reason for band C	Description of band C priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
<p><b>Band C Non urgent</b>  <b>There are no guideline waiting times for this band, as it is difficult to anticipate the frequency with which people in this category will be successful on Locata. This group will always be considered <i>after</i> other property bidders in bands A+, A and B.</b></p>				
<p>Other homeless people within the meaning of part VII of the Housing Act 1996, including those owed a duty by another borough</p>	<p>Applicants accepted homeless under S. 193(2) or S. 195 (2) of the 1996 Housing Act or S. 65 of the 1985 Housing Act who are occupying emergency accommodation or suitable temporary accommodation provided under the Housing Act 1996 Part VII. Applicants who applied as homeless after 08/11/12, for up to 1 year from the date of discharge of duty into a private rented sector property.</p> <p>Applicants accepted homeless since 30/11/12 under S. 193(2) or S. 195 (2) of the 1996 Housing Act or S. 65 of the 1985 Housing Act who have refused a reasonable offer of private sector housing since they approached Harrow for housing.</p> <p>No duty accepted because not in priority need or because found to be intentionally homeless (verification will be carried out at the time of any offer and, if the applicant is no longer homeless, or has spent some of their waiting time in suitable housing, no tenancy will be offered or, if now homeless again, their priority date adjusted).</p> <p>Another council has accepted a duty under homelessness legislation and Harrow is satisfied that the council that owes the duty is unable to provide accommodation.</p>	<p>date the applicant became homeless<sup>59</sup></p>	<p>No time limits</p>	<p>No penalties</p>

<sup>59</sup> The date cannot precede the date of the homeless application.

Reason for band C	Description of band C priority reason	Relevant priority date	Time limits	Consequence of Refusal
Other homeless people within the meaning of part VII of the Housing Act 1996, including those owed a duty by another borough	<p>Making effective use of Council owned accommodation assets.</p> <p>Temporary occupants of Council owned housing used as temporary accommodation to be offered as a secure tenancy at the time that the property is moved from General Fund into Council Housing Management</p> <p>The offer of a secure tenancy will be subject to suitability of the property and there being no recent tenancy issues such as arrears or ASB by the occupant.</p> <p>Households who are threatened with homelessness within 56 days and are owed a homelessness prevention duty, under homelessness legislation.</p> <p>Households who are homeless and are owed a homelessness relief duty, under homelessness legislation.</p>	Date the applicant became homeless	No time limits	End of homelessness duty
Previously accepted homeless “qualifying offer” applicants (group 6)	Households who were accepted homeless and who have subsequently accepted a <i>qualifying offer</i> allowing them to remain in private sector accommodation after the duty has ceased, The applicant must renew their registration every year and continue to have a priority need in order to retain this priority.	Original priority date when first accepted homeless	No time limits	No penalties
Council & partner housing association debtors	People who owe the council or one of our partner housing associations money– original band can be restored upon satisfying the criteria for arrangements to repay the debt.	Original priority date in band A+, A or B		

Deliberate damage to Property	people who, even though they are owed the statutory reasonable preference, have left their temporary accommodation or public rented housing in such a bad state, as judged on pre-inspection or by failure to allow access for inspection, that the cost of bringing it back to a lettable standard far exceeds the acceptable level of costs that would normally be incurred – if still living in the property original band can be restored upon the tenant making good the	Original priority date in band A, B or C		
Serial refusers	One reasonable offer refused (band A* emergencies) Two reasonable offers refused (band A urgent) Three reasonable offers refused (band B reasonable preference)	Original priority date in band A+, A or B		
<b>Reason for band C</b>	<b>Description of band C priority reason</b>	<b>Relevant priority date</b>	<b>Time limits</b>	<b>Consequence of Refusal</b>
Overcrowding and high priority hardship (homeseekers only) (group 3)	reasonable preference for housing will only be given where overcrowding is severe, as defined in Section 21.2. This is because, in the prevailing housing conditions in Harrow, many people lack a bedroom without a need for public rented housing being indicated.  With dependent children and living in insecure accommodation with no bedroom or lacking amenities	Date the tenant became severely overcrowded.  Date all relevant information submitted	No time limits	No penalties



Out of Borough Older people approved for sheltered accommodation (group 19)	Out of borough applicants (usually 60 years+, but exceptionally 55 years+) who are assessed as likely to benefit (e.g. by retaining their independence for longer) from sheltered or other specialist older people's accommodation where there is a need to move to Harrow.	Date of registration or becoming eligible for older people's housing, whichever is the later		
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Reason for band C- (minus)	Description of band C- (Initial Preference) priority reason	Relevant priority date	Time limits	Consequence of refusal
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### Band C- (minus) Initial Preference

**There are no guideline waiting times for this band, as it is difficult to anticipate the frequency with which people in this category will be successful on Locata. This group will always be considered *after* other property bidders in bands A+, A, B and C.**

Initial Preference	<p>Applicants who are assessed as having a significant housing need – i.e. they fit into one of the statutory “reasonable preference” priorities described in Section 8.1, are living in the borough of Harrow but have not been resident in the borough continuously for the last 5 years.</p> <p>With an identified housing need to whom the council give reasonable preference, where there has been a deliberate change in circumstances which has resulted in a worsening of a household's circumstances (for example: moving from suitable accommodation into overcrowded accommodation or inviting other people to join a household and make it overcrowded)</p>	<p>date the applicant registered on Locata</p> <p>Date all relevant information submitted</p>	No time limits	No penalties
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## Appendix 16 - Confidentiality and Data Protection

The Council treats housing applicants' personal information as confidential in accordance with data protection legislation. In normal circumstances, this information is only disclosed to landlords participating in the choice based letting scheme within Harrow (and outside where applicants bid on cross partner properties) to enable them to consider an application and to determine whether an offer of accommodation can be made. Applicants give their consent to this disclosure in completing the online housing application.

Personal information is only disclosed to other parties with applicants' consent or in exceptional circumstances where disclosure without consent is warranted, defined as follows:

- Where there are over-riding legal, social or public interest considerations, for example, a risk of serious harm to the person themselves or to others if the information is not disclosed, where there is a serious threat to another party's staff or contractors
- Where the information is required by a local authority department or its external auditors to carry out statutory functions
- Where the information is required by the police as part of a criminal investigation (Crime and Disorder Act 1998, Section 115)

Medical information obtained from an applicant's GP or other healthcare staff cannot be passed on without prior consent from the professional(s) involved.

All applicants for housing have the right to see information the Council holds about them, regardless of the date the information was recorded. This extends to their housing application records, and information about members of their family held for the purposes of that application. The right of access covers "personal" information, namely, factual information and expressions of opinion, which relate to a living individual.

In certain circumstances the Council may refuse access. This arises where, for example, the information: -

- may identify a third party and that party has not consented to the Disclosure;
- concerns an individual's health, and disclosure may cause serious harm to the wellbeing of the applicant; or
- is held for the purpose of prevention or detection of crime or in respect of some other legal proceedings

Requests for access to records must be made in writing to the officer dealing with the applicant's case.

## **Appendix 17 – Summary of amendments to Housing Allocations Scheme approved by the Council’s Cabinet on 21 January 2021 to take effect from 1 April 2021**

### **1. Implement more robustly the penalties that already exists in the allocation scheme for refusals and not bidding**

Following a review of the scheme, it was identified that a high number of applicants either refused an offer of a tenancy or did not bid for available suitable vacancies. The aim of Harrow's housing allocation scheme is to meet local priority housing needs, make the best use of Harrow's very limited social housing stock and be fairer to all by ensuring that the relatively few residents who are in the most need of housing, wait as short a time as possible for an allocation of public rented housing. In order to retain the principle of choice, ensure that those in most need of housing wait as short a time as possible and minimize loss of rental income due to void properties, the significant change in this revised scheme is to implement more robustly the penalties that already exists in the allocation scheme as follows:

- (j) Refusals – where an applicant has refused one or more reasonable offers or have not turned up to a viewing when invited, they will be downgraded to a lower priority band. The circumstances are set out in detail in the chart in appendix 16.
- (k) Not bidding – where an applicant who urgently need to move, for example where a band A+ and A applicant has not been bidding, they may receive a direct offer of accommodation. The chart in appendix 16 outlines which groups of applicants we may make direct offers.

### **2. Introducing a separate banding for sheltered Housing for Older People to make it easier to access sheltered housing.**

Currently all sheltered applicants awarded Band B. Urgent cases are awarded Band A general needs but prioritised for sheltered housing which is difficult to administer. Demand for sheltered housing in Harrow is outstripping supply.

We have introduced the following banding for Sheltered Housing for Older People which will make it easier to administer and prioritise those with urgent need to move:

- A) Urgent Priority
- B) Standard Priority
- C) Out of Borough Applicants

As with the current scheme, applicants will be considered and banded in either the general needs scheme or sheltered scheme, but not both.

### **3. Allowing current temporary occupants of Council properties to be offered a secure tenancy of the property they occupy.**

The property will be offered to the occupants when it is converted from the temporary use to a council managed permanent property. The offer will be subject to suitability of the property for the existing household and there being no recent tenancy issues such as arrears or ASB.

**4. Implementing a Local Lettings Plan for Council Schemes where necessary as is currently the case with Registered Provider Schemes.**

This will set out how properties will be allocated in exceptional circumstances to meet area specific issues, for a specific block or estate. The purpose is to have a planned approach to the letting of high density/high rise schemes to ensure sustainable mixed and balanced communities. The Divisional Director for Housing following consultation with the Portfolio Holder for Housing will authorise Local Lettings Plans for council housing stock under a delegated authority.

**5. Ending allocations to designated people aged 50 years and over.**

This is because some properties were previously designated for people aged 50 years and over. Over time and through the Right to Buy the age mix has changed and the blocks are no longer occupied only by over 50s. Therefore, there is no reason to continue to prioritise this group.

**6. Removing the local residence criteria for applicants:**

- i) moving because of domestic abuse and
- ii) people from the travelling community.

**7. Correcting the current anomaly in the Housing Allocation Scheme where applicants accepted as homeless by another council are given higher priority than those accepted as homeless by Harrow Council.**

All homeless applicants will be awarded Band C whether they are accepted by another Council or Harrow Council.

**You will need to produce an Equality Impact Assessment (EqIA) if:**

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)		
<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	Review of Social Housing Allocation Scheme	<b>Date EqIA created:</b> 13/12/22
<b>Name and job title of completing/lead Officer</b>	Meghan Zinkewich-Peotti Housing Strategy Project Manager	
<b>Directorate/ Service responsible</b>	Housing Division, Place Directorate	
Organisational approval		
<b>EqIA approved by the EDI Team:</b>	<b>Name: Jennifer Rock</b>  <b>Assistant Policy Officer</b> <b>EDI Team</b>	<b>Signature</b> <input checked="" type="checkbox"/> <b>Tick this box to indicate that you have approved this EqIA</b>  <b>Date of approval: 02/03/23</b>

## 1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

(to be completed **after** you have completed sections 2 - 5)

### a) What is your proposal?

The proposal is a minor amendment to Harrow Council's Housing Allocation Scheme for social housing. The Housing Allocation Scheme is a statutory requirement of Part VI of the Housing Act 1996 as amended by the Homelessness Act 2002 and the Localism Act 2011. The Scheme sets out how the Council allocates the rented social housing which is either owned by Harrow Council or which is owned by housing associations (registered providers) but to which Harrow Council has nomination rights. The Scheme sets out the eligibility criteria for joining the social housing register and the policy for prioritising housing applications.

The proposed amendment to the Scheme is required following an Order made by the High Court of Justice in connection with a judicial review claim by a housing applicant. The proposed amendment will remove the local residency requirement for eligible non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow or another place in the UK (for example, if they have lived in Home Office asylum accommodation and have had no choice in the location). This approach is in line with that of other local authorities.

### b) Summarise the impact of your proposal on groups with protected characteristics

The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow or another place in the UK. As non UK national with refugee status in the UK have the protected characteristic of race within the meaning of section 9 Equality Act 2010, the proposed change will have a positive impact on eligible applicants with this protected characteristic.

### c) Summarise any potential negative impact(s) identified and mitigating actions

No potential negative impacts have been identified in relation to the proposed change, but the impact of the proposed change once implemented will be monitored and reviewed to identify any positive or negatives outcomes in relation to any protected characteristics.

<b>2. Assessing impact</b>					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <a href="#">borough profile data</a> , <a href="#">equalities data</a> , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on <b>each</b> group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
<b>Protected characteristic</b>	For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	<b>Negative impact</b>		No impact
			Minor	Major	
<b>Age</b>	<p><b>Population of Harrow</b> The total usual resident population in Harrow on Census Day 2021 was 261,200 people. 19.7% of residents were children (aged 0-15), 64.9% were of working age (16-64) and 15.4% were aged 65 and above. On Census Day 2021, 64,067 (24.5%) people in Harrow had a non-UK identity only and 10% of people in Harrow had lived in the UK for less than 5 years. The data on age has not yet been released.</p> <p><b>Social Housing Register</b> On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. Of the 1986 home seekers, 3.7% were aged under 25 years, 47.5% were aged between 25 and 45 years old, 40.6% were aged between 45 and 64 years old and 8.1% were aged 65 years and older.</p> <p>While older people are under-represented on the housing register compared to the overall population this is likely to be because of the range of other specialist housing and care options available to them, such as living with relatives, domiciliary care and residential care.</p> <p>The age profile of applicants on the housing register is influenced by other wider factors, such as income levels (including welfare benefits) by age, affordability of private rented</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



	<p>housing and home ownership for different age groups and the supply of affordable housing in Harrow.</p> <p><b>Applicants who are non-UK nationals</b> On 21 February 2023 there were 201 eligible home seekers on the housing register who were non-UK nationals. 5% were aged under 25 years, 53.2% were aged between 25 and 45 years old, 42.3% were aged between 45 and 64 years old and 5.5% were aged 65 years and older. 126 of these applicants were in Band C-, of which 3.2% were aged under 25 years, 64.2% were aged between 25 and 45 years old, 29.4% were aged between 45 and 64 years old and 3.2% were aged 65 years and older.</p> <p><b>Impact of the proposed amendment</b> The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow or another place in the UK, across all age groups.</p>				
<p><b>Disability</b></p>	<p><b>Population of Harrow</b> The total usual resident population in Harrow on Census Day 2021 was 261,200 people. 12% of residents identified as disabled under the Equality Act 2010. Figures from the latest census of England and Wales show 31,258 people in Harrow said they had such an impairment as of March 2021 – 13.2% of the area's population. Of these people, 17,450 (7.3%) said their disability stopped them from carrying out regular activities 'a little', while 13,808 (5.9%) said it did so 'a lot'. In the ONS Annual Population Survey (Oct 2021 to Sep 2022) 15.9% of Harrow's working age population classified themselves as disabled, a total of 25,000 people.</p> <p><b>Social Housing Register</b> On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. 4.2% of the 1986 home seekers were awarded priority Band A+ or A for 'Medical' reasons, and 5.8% were in receipt of disability benefit.</p> <p>Others with disabilities or long-term health conditions may have cumulative needs and be given priority under a different reason such as 'Severe Hardship' or 'Social</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>Hardship'. It is also likely that applicants in categories such as 'Under-Occupation' and 'Elderly Sheltered' are disabled or have a long-term health condition.</p> <p>Unlike some other protected characteristics, the status of disability can change. Whilst we record this information at the application stage and again at the offer/letting stage, and it is the responsibility of the applicant to notify us of changes in their circumstances, we are unable to keep every record up to date on the Housing Register. For these reasons there is currently limited comprehensive data on disability.</p> <p><b>Applicants who are non-UK nationals</b> On 21 February 2023 there were 201 eligible home seekers on the housing register who are non-UK nationals. 2.5% were awarded priority Band A+ or A for 'Medical' reasons, and 12.4% were in receipt of disability benefit. 126 of these applicants were in Band C-, and 14 (12.5%) were in receipt of disability benefits.</p> <p><b>Impact of the proposed amendment</b> The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow or another place in the UK. Based on the limited data available, a small number of the applicants who will be positively impacted by this change may have the protected characteristic of disability.</p>				
<p><b>Gender reassignment</b></p>	<p><b>Population of Harrow</b> The total usual resident population aged 16 years and over in Harrow on Census Day 2021 was 209,261 people, of these 18,832 people gave no answer. 188,901 people (90.1%) aged 16 years and over had a gender identity the same as sex registered at birth, and 1108 (0.9%) had a gender identity different from sex registered at birth but no specific identity given. 776 (0.37%) identified as trans, includes people who identify as a trans man, trans woman, non-binary or with another gender identity.</p> <p><b>Social Housing Register</b> On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were 'home seekers' and 193 (8.7%) were 'transfer applicants'- those already in social housing but with an identified need to move to a more suitable property. There</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>is limited data on gender reassignment. There were no applicants identifying as trans or non-binary.</p> <p><b>Impact of the proposed amendment</b> We do not have sufficient data on gender reassignment to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group.</p>				
<b>Marriage and Civil Partnership</b>	<p><b>Population of Harrow</b> The total usual resident population in Harrow on Census Day 2021 was 261,200 people. 112,921 (53.9%) of Harrow's residents were married, which was the highest level in London. There were 89642 Households in Harrow. 19162 (21.4%) of households were married, or in same-sex civil partnerships, with dependent children, one of the highest levels in London.</p> <p><b>Social Housing Register</b> There is limited data on marriage and civil partnership.</p> <p><b>Impact of the proposed amendment</b> We do not have sufficient data on marriage and civil partnership to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Pregnancy and Maternity</b>	<p><b>Population of Harrow</b> The total usual resident population in Harrow on Census Day 2021 was 261,200 people. ONS births figures show Harrow as having 3312 live births in 2021. 12.7 live births per 1000 population is higher than the England &amp; Wales average of 10.5.</p> <p><b>Social Housing Register</b> On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. There is limited information specifically about pregnancy and maternity (with children aged under 2 years).</p> <p>Unlike some other protected characteristics, the status of pregnancy and maternity changes. Whilst we record this information at the application stage and again at the</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>offer/letting stage, and it is the responsibility of the applicant to notify us of changes in their circumstances, we are unable to keep every record up to date on the Housing Register.</p> <p><b>Applicants who are non-UK nationals</b> On 21 February 2023 there were 201 eligible 'home seekers' on the housing register who are non-UK nationals. 126 of these applicants were in Band C-. There is limited information specifically about pregnancy and maternity (with children aged under 2 years).</p> <p><b>Impact of the proposed amendment</b> We do not have sufficient data on pregnancy and maternity (with children aged under 2 years) to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group.</p>				
Race/ Ethnicity	<p><b>Population of Harrow</b> The total usual resident population in Harrow on Census Day 2021 was 261,200 people. Harrow's population is one of the most diverse nationally. In 2021, 45% of the population identified as "Asian" or "Asian British", which ranks 3<sup>rd</sup> nationally; 8.6% identified as "Black, Black British, Caribbean or African"; 3.8% identified themselves within mixed or multiple ethnic groups; 36.5% identified as "White"; 7.2% identified themselves within "Other" ethnic groups. Nationally, Harrow is home to the largest population of Sri Lankan born (4.1%) and Romanian born (8.1%) communities and has the 4th largest Afghan born (1.8%) population in the country.</p> <p><b>Social Housing Register</b> On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. 87% of home seekers disclosed their ethnicity and of these reports 23.2% were "White", 23.5% were "Asian", 20.1% were "Black", 5.8% were of "Mixed" ethnicity and 6.2% identified with "Other" ethnic groups.</p> <p><b>Applicants who are non-UK nationals</b> On 21 February 2023 there were 201 eligible home seekers on the housing register who are non-UK nationals. 94% of non-UK National home seekers disclosed their ethnicity and of these reports 40% were "White", 15% were "Asian", 14.5% were "Black", 5.5%</p>	☒	☐	☐	☐

	<p>were of “Mixed” ethnicity and 12% identified with “Other” ethnic groups. 126 of these applicants were in Band C-, and 49.2% were “White”, 11.1% were “Asian”, 9.3% were “Black”, 4.8% were of “Mixed” ethnicity and 13.5% identified with “Other” ethnic groups, and 11.9% did not state their ethnicity.</p> <p><b>Impact of the proposed amendment</b> The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years’ residence in Harrow. As non UK national with refugee status in the UK have the protected characteristic of race within the meaning of section 9 Equality Act 2010, the proposed change will have a positive impact on applicants with this protected characteristic.</p>				
<p><b>Religion or belief</b></p>	<p><b>Population of Harrow</b> The total usual resident population in Harrow on Census Day 2021 was 261,200 people. Harrow was the most religiously diverse borough in the country, with the highest population identifying as ‘Hindu” (67392, 25.8%) and lowest reporting “No religion” (10.6%), nationally. 7,695 (2.9%) identified with “Other” religions second highest number, nationally. This group includes Jainism and Zoroastrian religions. 7,304 (2.8%) of Harrow 's usual residents identified as Jewish and is the was the eighth largest nationally. 88,602 (33.9%) of residents were Christians, 41,503 (15.9%) identified as Muslims and 2812 (1.1%) Buddhist.</p> <p><b>Social Housing Register</b> On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. 31.9% were Christian, 35.4% were Muslim, 11.1% did not state their religion, 10.9% had no religion, 7.9% were Hindu, 1.5% were of Other religions, 0.51% were Jewish, 0.4% were Sikh and 0.3% were Buddhist. Of the home seekers, 32.5% were Christian, 34.9% were Muslim, 11.3% did not state their religion, 10.6% had no religion, 8.1% were Hindu, 1.4% were of Other religions, 0.4% were Jewish, 0.4% were Sikh and 0.3% were Buddhist.</p> <p><b>Applicants who are non-UK nationals</b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>On 21 February 2023 there were 201 eligible home seekers on the housing register who are non-UK nationals. 126 of these applicants were in Band C-, 37.5% were Christian, 29.8% were Muslim, 10.6% did not state their religion, 14.5% had no religion, 3.8% were Hindu, 1.9% were of Other religions, 1% were Buddhist and 1% were Sikh.</p> <p><b>Impact of the proposed amendment</b> The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow, across all religious groups.</p>				
<b>Sex</b>	<p><b>Population of Harrow</b> The total usual resident population in Harrow on Census Day 2021 was 261,200 people. 132,406 (50.7%) of residents were female and 128,797 (49.3%) were male.</p> <p><b>Social Housing Register</b> On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. Of the 1986 home seekers, (63.7%) were female and (36.3%) were male.</p> <p><b>Applicants who are non-UK nationals</b> On 21 February 2023 there were 201 eligible home seekers on the housing register. who were non-UK nationals. 50.3% were female and 49.7% were male. 126 applicants were in Band C-, 49.2% were female and 50.8% were male.</p> <p><b>Impact of the proposed amendment</b> The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow, across both female and male applicants.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Sexual Orientation</b>	<p><b>Population of Harrow</b> The total usual resident population aged 16 years and over in Harrow on Census Day 2021 was 209,261 people. 182,702 people (87.2%) aged 16 years and over in Harrow identified as straight or heterosexual and 4239 people (2.02%) aged 16 years and over in Harrow identified as lesbian, gay, bisexual, or other (LGB+).</p> <p><b>Social Housing Register</b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. There is limited data about sexual orientation. Only 36% of home seekers disclosed their sexual orientation. Of these reports 80% identified as heterosexual/straight, 2.6% identified as bi-sexual with 1% identifying as gay or lesbian.</p> <p><b>Applicants who are non-UK nationals</b> On 21 February 2023 there were 201 eligible home seekers on the housing register who are non-UK nationals. 87% of non-UK National 'home seekers' disclosed their sexual orientation, of these reports 78% identified as heterosexual/straight, 4.5% identified as bi-sexual with none identifying as gay or lesbian. 126 applicants were in Band C-, 77% identified as heterosexual/straight, 6.4% identified as bi-sexual, 0% identified as gay or lesbian, 0.8% identified as 'other' and 15.9% did not state their sexuality.</p> <p><b>Impact of the proposed amendment</b> The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow, across all sexual orientations.</p>				
<p><b>2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?</b></p> <p><input type="checkbox"/> Yes                      No    <input checked="" type="checkbox"/></p>					
<p>If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below</p>					
<p><b>2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc.), could your proposals have an impact on individuals/service users, or other groups?</b></p> <p><input type="checkbox"/> Yes                      No    <input checked="" type="checkbox"/></p>					

If you clicked the Yes box, Include details in the space below

### 3. Actions to mitigate/remove negative impact

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer

### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

The proposal will eliminate discrimination against eligible social housing applicants who are non-UK national with refugee status in the UK and have the protected characteristic of race under the Equality Act 2010, advancing equality of opportunity between social housing applicants from different groups.

### 5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies



**Outcome 1**

**No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

 **Outcome 2**

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

 **Outcome 3**

**This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here

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**Report for: Cabinet**

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<b>Date of Meeting:</b>	16 <sup>th</sup> March 2023
<b>Subject:</b>	Authority to Implement and administer Extra Support Schemes for Residents in 2023/24
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Dawn Calvert - Director of Finance & Assurance
<b>Portfolio Holder:</b>	Councillor David Ashton – Portfolio Holder for Finance & Human Resources
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	None

## Section 1 – Summary and Recommendations

The Government announced £100 million of additional funding for local authorities to support the most vulnerable households in England. Harrow's allocation of this funding will allow it to deliver additional support to the 13,000 households who are already in receipt of council tax support, including both working age and pensioner claimants of the support. The funding is for the 2023-24 financial year only. This report proposes a rebate scheme for pensioners for the financial year 2023/24 only.

Additionally, this report informs of the need for the local authority to administer the winter support payment for eligible households that use alternative fuels like heating oil.

### Recommendations:

Cabinet is requested to consider the information given in this report and agree:

- 1) to introduce a new one-off Council Tax Reduction for Pensioners and Working Age claimants in receipt of local council tax support (LCTS) as at 1/4/2023. Pensioner & working age LCTS recipients will be eligible for a one-off grant as per Tables 1 & 2 in this report.
- 2) to authorise the Director of Finance and Assurance to administer awards under the provisions of Section 13A(1)(c) of the Local Government Finance Act 1992 (as amended by the Local Government Finance Act 2012), in respect of the Council Tax reduction for Pensioners & Working Age claimants
- 3) to note the need to award the Alternative Fuel Support Payments to all qualifying households and to authorise the administration of the scheme on behalf of Government.

### Reason: (For recommendations)

To fulfil the Council's obligations under the relevant guidance's issued.

## Section 2 – Report

### Introductory paragraph

#### Council Tax Support Fund for 2023/24

- 2.1 The Government announced £100 million of additional funding for local authorities to support the most vulnerable households in England. This is to recognise the impact of rising bills. Out of the £100m, Harrow was allocated £346k.
- 2.2 This new grant funding will need to be used in 2023-24 for Harrow to support economically vulnerable households in their area with council tax payments.

- 2.3 Local authorities are required to have in place LCTS schemes to offer council tax reductions to those facing financial hardship and will be preparing their schemes for 2023-24 by the statutory deadline of 11 March 2023. To supplement this local support, in the Government's Council Tax Support Fund Guidance for 2023/24 dated the 23 December 2022 (**the Guidance**), the Government expects Harrow will use their grant allocation to fund further reductions in the council tax liability of individuals receiving LCTS with an outstanding council tax liability.
- 2.4 Harrow will also have the flexibility to determine the local approaches to support vulnerable households in its area in accordance with the Guidance.

### **Support Scheme for Working Age Recipients of LCTS**

- 2.5 The Scheme being introduced today will apply (a) to Working Age recipients of LCTS, by ensuring they receive the core £25 as set out in the national guidance, plus a further discretionary amount of up to £29 to reflect the amounts that will actually be awarded as per the table 2 below, (as agreed by Cabinet on the 8/12/2022).

Table 1 - For Financial Year 2023/24 – Working Age Rebates to be awarded

CTS Entitlement as a % of Council Tax liability	Numbers of claimant households	Discretionary award to be granted per qualifying household for year 2023/24
70%	2702	£36.00
60-69%	471	£45.00
<60%	1675	£54.00
86% (vulnerable)	3373	£30.00
		<b>£310,107 Total Cost</b>

The Scheme Harrow adopted for working age recipients of LCTS will therefore see working age households obtaining one off rebates between £30 and £54. This is actually more generous than the national guidance suggests.

### **Support Scheme for Pensioners**

- 2.6 The second Scheme being introduced will apply to (b) Pensioner recipients of LCTS only. It is proposed Pensioners in receipt of local council tax Support will also be eligible (as per the guidance issued). Any pensioner Household whose liability is £0 council tax as at 1/4/2023 (for the 2023/24 financial year) will be awarded no rebate, those whose liability is £1 to £24 will be awarded an amount equal to the sub £25 liability, and those whose liability is £25 or more will be awarded £25. This is in accordance with the amounts set out in the national Guidance and shown in table 2 below.

Table 2 - For Financial Year 2023/24 – Pensioner Rebates to be awarded

Amount of 2023/24 Council Tax owed by the Pensioner Household on 1/4/2023	Anticipated Numbers of claimant households	Discretionary award to be granted per qualifying household for year 2023/24
£0 Owed **	3,442	£0.00
£1 - £24	96	£1- £24
<£25	1,138	£25.00
		<b>£29,602</b>
		<b>Anticipated Total Cost</b>

\*\*This cohort of pensioners (which includes pension guarantee credit) generally receive 100% Council Tax Support already so are not expected to pay any council tax in 2023/24. As such, as they will not owe any amount, they will receive £0 support under this scheme.

- 2.7 It is anticipated that the Pensioner and Working Age schemes, plus the discretionary top up amount for working age recipients, will cost approximately £340k. As the local authority is able to use a proportion of its allocations to determine its own local approach to supporting economically vulnerable households with council tax bills, Harrow is therefore proposing to allocate any unspent grant monies to our Council Tax Hardship Fund which will support one off applications for relief from residents who may not be able to pay their council tax due to the steep rise in the cost of living. This will ensure all funds received from are allocated to local households rather than Harrow having to refund any unspent grant back to Government.
- 2.8 Eligibility criteria to be met are that recipients will need to be a Harrow council taxpayer as at 01/04/23 and be in receipt of LCTS on that date.
- 2.9 The award will be granted automatically, and no application process is required. Any Pensioner or Working Age claimant ceasing to receive LCTS after the award date or moving away from Harrow will have their allocation adjusted accordingly.

### **Administration of Alternative Fuel Winter Allowance.**

- 2.10 The government has announced details for how people in England, Scotland and Wales without a direct relationship to a domestic energy supplier, will receive a £400 discount on their fuel bills through the Energy Bills Support Scheme Alternative Funding (EBSS Alternative Funding).
- 2.11 Households in Harrow that use alternative fuels like heating oil will receive a £200 payment this winter. Additionally, households without a direct relationship to an energy supplier – such as care home or park home residents – will be able to apply online for £400 of non-repayable help with their fuel bills.
- 2.12 These schemes augment the cost-of-living package of assistance the government has in place to help reduce energy bills for households across the United Kingdom.

- 2.13 An online application scheme, operated by Government, will open in January for households in England. Payments to households that meet the eligibility criteria will be made by local authorities in Great Britain. This is likely to include:
- care home residents
  - residents of park homes
  - tenants in certain private and social rented homes
  - homes supplied via private wires
  - residents of caravans and houseboats on registered sites
  - farmers living in domestic farmhouses
  - off-grid households
- 2.14 Applicants will only be able to submit information through GOV.UK and cannot contact their local authority. Once customers have applied to receive support and their applications have been processed and verified by GOV.UK, eligible customers' details will be shared with Harrow, who will make a payment for the one-off, non-repayable support this winter.
- 2.15 New burdens funding will be given to LA's to compensate them for the administrative burden of running the scheme and making the payments. This will be on top of any programme funding to be paid to recipients which will also be funded by Government.

### **Legal Implications**

The Guidance and press statements in December 2022 set out the Governments intentions and what was expected of local authorities in respect of administering the schemes set out in this report. Harrow will need to implement and administer the schemes for the coming year and ensure payments are made in a timely fashion.

Paragraph 11 of the Guidance states that, "the government expects that billing authorities will use their grant allocation to fund further reductions in the council tax liability of individuals receiving LCTS with an outstanding council tax liability, by up to £25. Local authorities are also able to use a proportion of their allocations to determine their own local approaches to supporting economically vulnerable households with council tax bills."

Section 13A (1) (c) of the Local Government Finance Act 1992 (as amended), provides the Council with the power to reduce the amount of Council Tax due 'as it sees fit.' Section 13A(2)(c) also allows a local authority to create a 'scheme' to reduce the Council Tax for persons or a class of persons that it considers being in financial need. The Cost of any reduction awarded under Section 13A(1)(c) must be met in full by Harrow Council. Section 13A(6) states that the power under Section 13A(1)(c) includes a power to reduce an amount to nil.

### **Financial Implications**

The council tax support fund rebate for pensioner households is a call on the general fund. However, the settlement included an amount of £346k for this purpose and as such that grant income will be ringfenced to fund the schemes mentioned.

The alternative fuels support is a Government initiative. As long as the Council complies with the conditions set out in the various letters and guidance issued there are no financial implications. The schemes are fully funded and should not impact on Harrow's finances.

There is however a risk that the new burdens amounts promised may not be sufficient to meet the actual costs of administering the schemes, considering the amount of staff resource that may be needed to carry out awards / make payments. If that is the case this will impact Revenue budgets.

### Ward Councillor Comments

No comments received

### Environmental Implications

There are no direct environmental impacts anticipated from the recommendations contained within this report.

### Data Protection Implications

There are no direct data protection impacts anticipated from the recommendations contained within this report.

### Procurement Implications

There are no procurement impacts anticipated from the recommendations contained within this report.

### Risk Management Implications

Risks included on corporate or directorate risk register? **No**

Separate risk register in place? **No** but part of overall budget risks

The following key risks should be taken onto account when agreeing the recommendations in this report:

Risk Identified	Mitigations	RAG Status
Timescales may not meet Government expectations	<ul style="list-style-type: none"> <li>▪ Government expects awards / payments to be made as early as possible and / or in a timely fashion. Programmed resources will ensure rebate awards will be fully completed by 30<sup>th</sup> of June and fuel payments within 30 days of the data being received from GOV.UK</li> </ul>	<b>Green</b>
If the recommendations are not accepted the Council will fail to uphold its obligations to allocate additional central government funding received and vulnerable residents and/or residents facing financial hardship will not be helped or supported during the current cost of living crisis	<ul style="list-style-type: none"> <li>▪ Acceptance of the recommendations in the report will fully mitigate this risk</li> </ul>	<b>Green</b>



Payments made too quickly due to pressure to get monies out asap leading to payments being made erroneously or to wrong person and decreased checks leading to increased fraud.	<ul style="list-style-type: none"> <li>Mitigated by adhering to an agreed process which may well take longer to ensure all payments are made correctly.</li> </ul>	<b>Green</b>
Not complying with suggested Government process risks programme funding being delayed or not paid	<ul style="list-style-type: none"> <li>The recommendations in this report comply with suggested processes and if adhered to will minimize risk to funding not being paid</li> </ul>	<b>Green</b>
Process open to abuse and fraud local, approaches in Harrow do not accurately identify or target those households who are eligible leading to rebate payments being made to inappropriate individuals or to those not intended to be helped by the rebate	<ul style="list-style-type: none"> <li>Council tax rebate will rely on Harrow's own data showing who is a pensioner as at a particular point in time and the fact that they are receiving LCTS. As such there is no application process. Re alternative fuels, eligible applicants are already vetted by GOV.UK so all the authority is doing is validating bank accounts in order to pay. Payment runs will have due regard to risks identified in relation to compliance with any likelihood for non-compliance being subject to reasonable steps being undertaken to mitigate that risk.</li> </ul>	<b>Green</b>
The estimate of scheme cost at £340K is not accurate/is too optimistic leading to additional costs and budget overspends being incurred in this area	<ul style="list-style-type: none"> <li>Cost of scheme is funded by central government. If estimates are wrong Harrow will be compensated for extra cost or will have to refund underspends.</li> </ul>	<b>Green</b>
New Burdens funding may be insufficient to meet full administration costs	<ul style="list-style-type: none"> <li>Funding not yet announced. However, if the new burdens amounts are low, the revenue budget would need to cover any additional funding gap.</li> </ul>	<b>Green</b>

### **Equalities implications / Public Sector Equality Duty**

There are no Equalities implications arising from the recommendations within this report; the local authority is simply acting as an agent in delivering prescribed schemes for Government.

### **Council Priorities**

Agreeing the rebate scheme will support our most financially vulnerable council taxpayers by reducing council tax inflation for the year 2023/24.

## **Section 3 - Statutory Officer Clearance**

**Statutory Officer: Dawn Calvert**

Signed off by the Chief Financial Officer

**Date: 10 February 2023**

**Statutory Officer: Baljeet Virdee**  
Signed on behalf of the Monitoring Officer  
**Date: 02 March 2023**

**Chief Officer: Dawn Calvert**  
Signed off by the Corporate Director  
**Date: 10 February 2023**

**Head of Procurement: Nimesh Mehta**  
Signed off by the Head of Procurement  
**Date: 10 February 2023**

**Head of Internal Audit: Neale Burns**  
Signed on behalf of the Head of Internal Audit  
**Date: 02 March 2023**

**Has the Portfolio Holder(s) been consulted? Yes**

### **Mandatory Checks**

*Ward Councillors notified: NO, as it impacts on all Wards*

*EqlA carried out: NO*

This is a technical financial report which does not require an EqlA.

*EqlA cleared by: N/A*

## **Section 4 - Contact Details and Background Papers**

**Contact:** Fern Silverio (Head of Service – Collections & Housing Benefits), Tel: 020-8736-6818 / email: [fern.silverio@harrow.gov.uk](mailto:fern.silverio@harrow.gov.uk)

### **Background Papers:**

- [Council Tax Support Fund guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/council-tax-support-fund)
- <https://www.gov.uk/government/news/vital-help-with-energy-bills-on-the-way-for-millions-more-homes-across-great-britain-and-northern-ireland>
- <https://www.gov.uk/search/all?keywords=ebss+alternative+funding&order=relevance>

**Call-in waived by the Chair of Overview and Scrutiny Committee - NO**

**Report for: Cabinet**

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<b>Date of Meeting:</b>	16 <sup>th</sup> March 2023
<b>Subject:</b>	Cabinet and Member Engagement in the Commissioning and Procurement Programme
<b>Key Decision:</b>	Yes - the procurement programme will have an effect on all wards across the borough and therefore is deemed to fall within the parameters of a key decision
<b>Responsible Officer:</b>	Dawn Calvert - Director of Finance & Assurance
<b>Portfolio Holder:</b>	Councillor David Ashton - Portfolio Holder for Finance and Human Resources
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	Appendix 1 - Contract Procedure Rules Revision 2023  Appendix 2 - Procurement Programme (£100,000 and above) Pipeline April 2023-March 2024  Appendix 3 - Contracts awarded (£100,000 and above) in the period January 2022 to end of December 2022

## **Section 1 – Summary and Recommendations**

This report sets out and seeks approval of the new approach to engagement and consultation with Cabinet in the council's commissioning and procurement process. Secondly, it seeks amendments to the Contract Procedure Rules to incorporate as mandatory the proposed approach set out in this report along with a number of other revisions to the Contract Procedure Rules. Finally, this report sets out the procurement programme for all values over £100,000 for the period April 2023 to March 2024 and all contracts awarded over £100k in the period January 2022 to end of December 2022.

### **Recommendations:**

Cabinet is requested to:

1. Recommend to full Council to approve the amendments to the Contract Procedure Rules as set out in Appendix 1.
2. Delegate the on-going updating of the annual procurement programme to the Director of Finance & Assurance in consultation with the Portfolio Holder for Finance and Human Resources and note that a procurement programme will be reported to cabinet annually.
3. Note the procurement programme for all procurement with an aggregate value of over £100,000 for the period April 2023 to March 2024. Appendix 2
4. Note all the contracts awarded over £100,000 during the period January 2022 to the end of December 2022. Appendix 3
5. Note that the annual review of low value procurement activity up to £100,000 will be undertaken by the Head of Procurement in consultation with the Portfolio Holder for Finance and Human Resources.

### **Reason: (for recommendations)**

To provide Cabinet with full oversight of the delivery of the procurement programme for the period January 2022 to end of December 2022,

Furthermore, to ensure that Cabinet has an early opportunity to see the planned procurement programme over £100,000 for the period April 2023 to March 2024 and to allow for early engagement of respective portfolio holders in each of the procurements under the programme over £500,000.

Finally, and to assure close communication and engagement with Cabinet and Portfolio Holders at all values of procurement, recommendation 5 is intended to offer assurance to Cabinet robust local authority governance and probity is in place in all procurement under £100,000.

## **Section 2 – Report**

### **Introductory paragraph**

The Council has an extensive annual procurement programme through which it contractually engages with third party organisations to provide works, goods, and services for the Council. Therefore, the Council has an important responsibility to ensure that the works, goods, and services are commissioned in line with the Council's vision of delivering a well-run council that provides value for money and puts residents first and at the heart of everything we do.

### **Options considered**

The two options considered for this report were:

- A. To continue to present Cabinet with individual reports over the year seeking approval to commence procurement for a specific contract without any engagement of portfolio holders in the planning and design of the commissioning and procurement and without cabinet having the opportunity to review and input into the tender documents as part of the cabinet reporting process.

**OR**

- B. To provide Cabinet with full and early details of the procurement programme for everything over £100,000 for the period April 2023 to March 2024, and to subsequently engage and consult in the planning and design pre procurement stage with portfolio holders and Cabinet on individual procurement projects over £500,000.

Option B was the preferred option to ensure Cabinet has further to their responsibilities valuable oversight and involvement in the delivery of the procurement programme and to allow for informed and strategic decision making at Cabinet and within and across directorates.

### **Background**

During 2022-2023 the Council to date has spent c.£271m on procurement of its goods and services. These are payments made in this financial year to third party organisations with whom we have procured. Harrow Council, like most councils, is a commissioning organisation. Nearly all of the services that the Council delivers are through contracting with private and voluntary sector organisations to deliver on our behalf.

Therefore, the process and disciplines of strategic commissioning, procurement and contract management plays a pivotal role in ensuring the Council is buying the right things, at the right volumes, at the right price, in a strategically planned, well managed and timely manner, and that this is done in full compliance with The Public Contracts Regulations 2015, the Council's Contract Procedure Rules and current best professional practice in procurement.

It is also important to note the global economic and political volatility, uncertainty, complexity, and ambiguity that will be with us for the foreseeable future. Which has a significant impact on Council commissioning and procurement.

The political, economic, social, legal, and environmental issues experienced in 2022 will continue to have an impact on public procurement in 2023. They are expected to include:

- High inflation
- Interest rate rises
- Energy price increases
- Cost-of-living pressures on consumers
- Supply chain prices rising due to Brexit, Russian invasion of Ukraine, and market volatility.
- The Procurement Bill expected to become law by the end of 2023 and replace the Public Contracts Regulations

### **Current situation**

In the period January 2022 to end of December 2022 56 contracts over £100k were awarded and entered into by the Council as per the table below. The figure of £78,650,313 in the table below is the total contract value of the 56 contracts awarded. Contract payment will be across many future years.

<b>Directorate</b>	<b>Contracts awarded January 2022 to December 2022</b>	<b>Total Value of all contracts awarded</b>
People	7	£8,337,813
Place	32	£61,368,450
Resources	17	£8,944,050
<b>Total</b>	<b>56</b>	<b>£78,650,313</b>

The detail behind each of the above awards is attached in Appendix 3.

The current governance process requires officers to seek approval from Cabinet to commence any procurement exercise over £500,000. The approval process however does not require comprehensive engagement and consultation with portfolio holders in the development of the scope of work, service or goods specifications, procurement strategy and other associated documents that together are referred to as the tender documents. The tender documents are developed by officers before and after approval to commence procurement has been granted by Cabinet. Engagement and communication about the commissioning and procurement is undertaken with portfolio holders but there is no approval by Cabinet of the tender documents.

### **Why a change is needed**

The reporting of the procurement programme to Cabinet at the start of each calendar year will ensure that Cabinet is sighted on all procurement activity and that it is transparent. This approach will lead to commissioning and procurement that wholly engages portfolio holders and Cabinet in the procurement programme and ensures that they are involved, particularly in the design and planning of services, so that they can contribute to achieving the very best outcomes for our residents.

The proposed changes also reflect that:

- Cabinet oversees the council vision and strategic priorities and must be satisfied that the procurement and commercial arrangements for their delivery are robust.
- Cabinet makes key decisions on behalf of the Council in relation to the procurement process, particularly in regard to major projects, and therefore has an important role in maintaining oversight of the performance of key contracts, and agreeing corrective action where necessary
- When fully engaged with procurement processes and commercial matters, the quality of associated Cabinet decision-making is therefore better, and oversight and accountability are improved.
- Engagement of the Cabinet also leads to better project delivery and better outcomes for the local community which is important in the delivery of the vision of a well-run Council providing value for money and putting residents first.

The procurement programme for the period April 2023 to March 2024 is detailed in Appendix 2. Below is a summary.

<b>Directorate</b>	<b>No of projects on the Procurement Pipeline over £100,000 (April 2023-March 2024)</b>	<b>Budgeted Total Contract Value (includes initial term and any extension options)</b>
People	9	£50,361,549
Place	44	£95,240,468
Resources	21	£109,468,286
<b>Total</b>	<b>74</b>	<b>£255,070,303</b>

### **Low value procurements below the reporting process**

The Contract Procedure Rules require quotations for all procurement below £100,000. This process also seeks to engage and contract with local SME/VCS providers of services by encouraging officers to seek a minimum of 1 quotation from a local provider. The procurement of works, goods and services below £100,000 are not subject to the Public Contracts Regulations 2015 and there is a high degree of flexibility in the way we undertake the engagement of suppliers at these low values.

The procurement team does not support this process, and it is incumbent on the procuring officer to comply with the Contract Procedure Rules. However, there are controls within the Council's main accounting system Microsoft D365 that require the quotations that have been received to be attached to the requisition. This comes through to the procurement team by a system called 'Describe what you need' for review and approval.

The procurement team as per recommendation number 5 will undertake an annual check on all expenditure that fall under the £100,00 threshold in consultation with the Portfolio Holder for Finance and Human Resources to ensure compliance and value for money.

### **What will the Change look like?**

The required change is simple but significant and is that closer consultation and engagement of Portfolio Holders in the commissioning and procurement process that are proposed in this report, particularly in the areas of design and planning of services, will enhance the opportunity to deliver better outcomes across all procurement and commercial activity.

The approval to commence a procurement process from Cabinet for each procurement project and oversight of the associated tender documents will create a holistic and effective partnership of delivering the procurement programme and will support the Council vision of putting residents first and demonstrating value for money.

### **How will this work ‘on the ground?’**

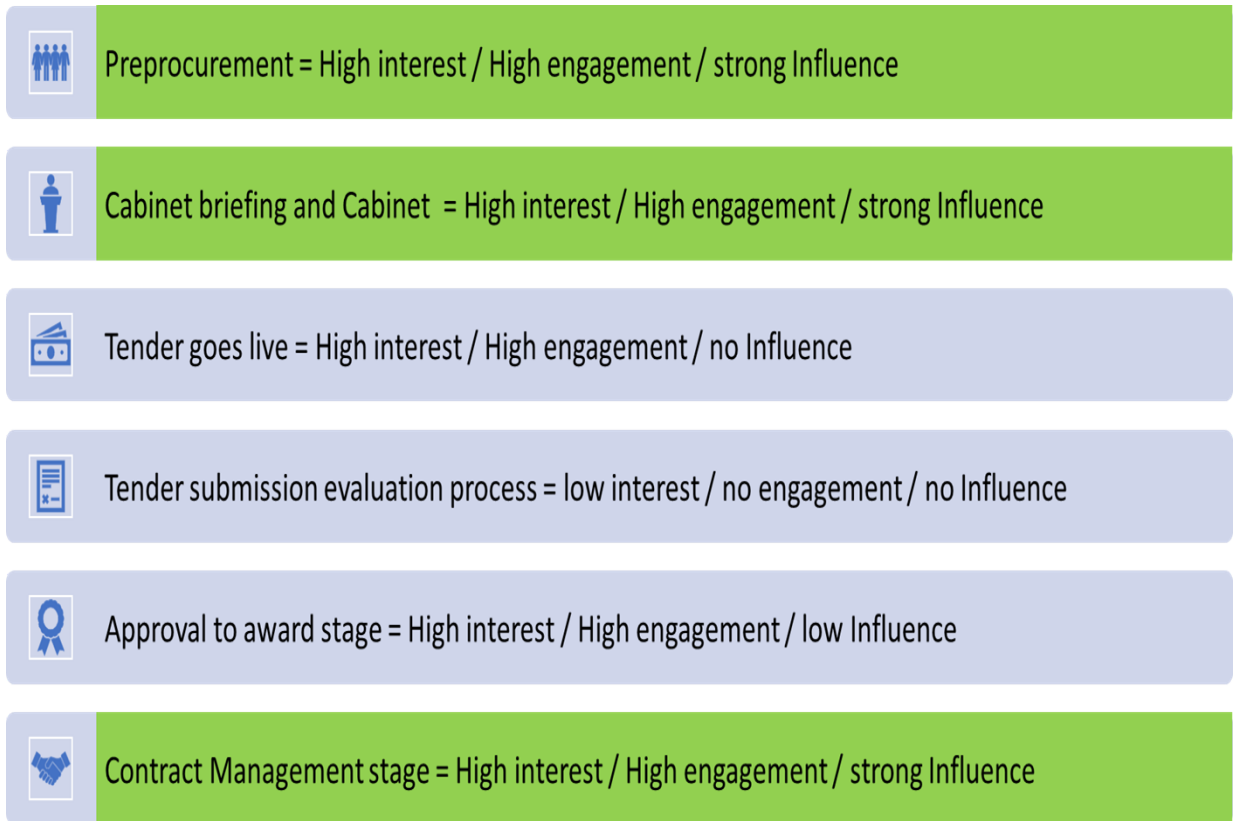
At the point of project initiation officers will begin their consultation, communication, and engagement with the portfolio holder on the work being undertaken to design the key tender documents. They include the specification/scope of works, the selection and evaluation questions that will be asked of tendering organisations and the respective score weighting attributed to the questions, the procurement options and the preferred option, the financial issues such as the budget and how the markets will be asked to provide their financial bids. The service area portfolio holder and any other portfolio holder that is identified as a stakeholder in the procurement will be engaged in the pre-procurement process where their influence will be significant and high.

Engagement and consultation with portfolio holders and cabinet may include:

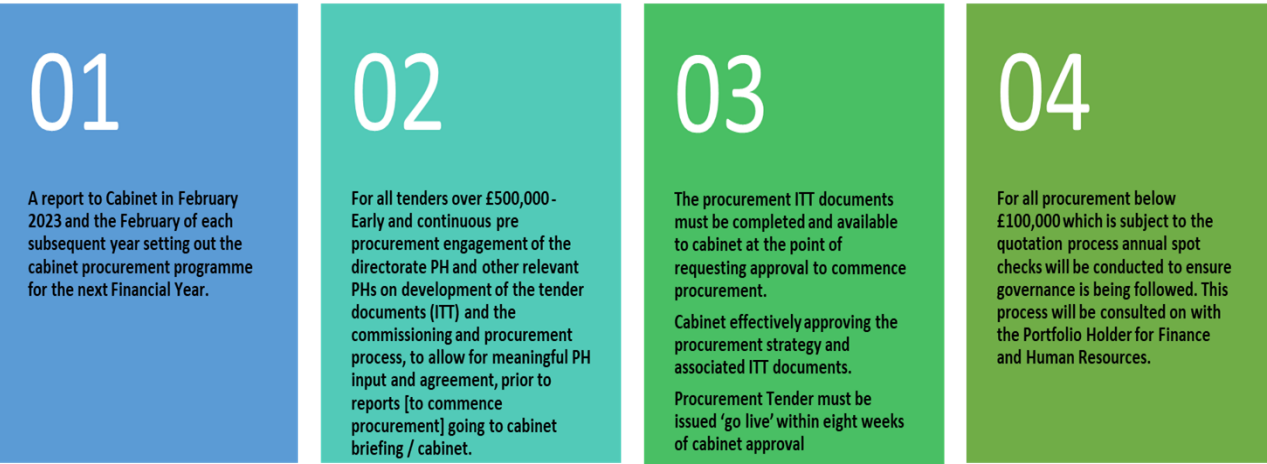
- preliminary market consultation
- the specification/scope of works,
- the questions that bidders will be asked, and the respective score weighting attributed to the questions
- the price/quality split / the evaluation criteria
- the procurement options and the preferred option,
- the financial issues such as the budget and how the markets will be asked to provide their financial bids.

The table below shows the stages in the procurement process where portfolio and Cabinet interest, engagement and influence will be at its highest.





The diagram below is a summary of the proposed changes to deliver Cabinet and Portfolio Holder engagement in procurement.



**Implications of the Recommendation**

There are no implications associated with the recommendations from a resources or financial perspective. The change to the new approach of engaging and consulting portfolio holders and Cabinet on the procurement programme will primarily require a change to working practice. Officers involved in the commissioning and procurement processes must now ensure portfolio holder engagement in the development of the tender documents and then final inclusion of the tender documents as a background document for approval with the Cabinet report seeking approval to commence procurement. The tender documents may have to be considered as Part 2 papers in the Cabinet report

as they will contain financial information that should only be visible to the market when the procurement process goes live.

Given the significant involvement of portfolio holders in the procurement process, a further key implication will be to ensure portfolio holders are trained in procurement and the training incorporates confidentiality, non-disclosure and declaration of interest requirements as these are additional risks of the new arrangements proposed in this report.

### Risk Management Implications

Risks included on corporate or directorate risk register? **No**

Separate risk register in place? **No**: A risk register will be created for each procurement under the procurement programme

The relevant risks contained in the register are attached/summarised below.  
**N/A**

The following key risks should be considered when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
<p>The Council fails to take appropriate measures to effectively prevent, identify and remedy any conflicts of interest arising with members in the conduct of procurement procedures, including conflicts of interest between duties and responsibilities of Portfolio Holders and members at the strategic level and at operational levels of procurement</p>	<ul style="list-style-type: none"> <li>▪ We will require Cabinet members to sign a declaration of confidentiality and non-disclosure on an annual basis.</li> <li>▪ Additionally, we will require a further individual procurement-specific declaration of any conflict of interest from Portfolio Holder or members relating to each procurement Portfolio Holders or Members are involved in or contributing to at the operational level</li> <li>▪ Training given to Portfolio Holders and members and will specifically cover the area of Conflict of Interest and how to comply with The Public Contracts Regulations 2015 (PCR) and the Council's Contract</li> </ul>	<p><b>Amber</b></p>

Risk Description	Mitigations	RAG Status
	<p>Procedure Rules and Financial Regulations</p>	
<p>Portfolio Holders could, based on their relative lack of experience and expertise in procurement, and also on their knowledge of the tender documents, give advance notice or otherwise disclose tender requirements to tenderers, in such a way as to give these tenderers an unfair advantage over other tenderers</p>	<ul style="list-style-type: none"> <li>▪ We will require Cabinet members to sign a declaration of confidentiality and non-disclosure on an annual basis.</li> <li>▪ Where necessary, the ITT will be a Part 2 document of the Cabinet report thereby making it confidential and not visible to tenders until the tender goes live</li> </ul>	<p>Amber</p>
<p>Officers not adopting the new approach leading to non-compliance with the Contract Procedure Rules</p>	<ul style="list-style-type: none"> <li>▪ Recommendation 1 is seeking approval to amend the Contract Procedure Rules to ensure and embed the new approach so that it is seen as mandatory and not desirable</li> <li>▪ Over 250 officers from across the Council have been trained between November 2022 and the end of January 2023 on the procurement rules including the new arrangement on member involvement.</li> <li>▪ Procurement boards in each directorate will ensure compliance with the new requirements.</li> <li>▪ Annual spot review of compliance.</li> </ul>	<p>Green</p>

Risk Description	Mitigations	RAG Status
Delays in tendering timetables.	<ul style="list-style-type: none"> <li>▪ The visibility of the procurement programme to Cabinet and the new approach adopted should not create any delays as there is no change to the process other than having the tender documents ready for Cabinet to approve.</li> </ul>	Green
Portfolio Holders do not have the technical skills and expertise in the commissioning and procurement process to engage meaningfully at the operational level.	<ul style="list-style-type: none"> <li>▪ Portfolio holders have been engaged and consulted on the development of tender documents and have demonstrated how useful their input is to the process.</li> <li>▪ The CPRs and a procurement FAQ document has been circulated to Cabinet members to support their development and understanding of the procurement / tendering process.</li> <li>▪ Training in procurement will be given to members in the spring of 2023 enhancing knowledge of the commissioning and procurement process and to develop their expertise</li> </ul>	Amber
Involvement in the procurement programme is too resource intensive for portfolio holders.	<ul style="list-style-type: none"> <li>▪ Cabinet have agreed to undertake pilots where each directorate will identify tenders to pilot, and the pilot process will be used to learn lesson and modify the process as necessary</li> </ul>	Amber
Where approval is being sought from cabinet for a programme of procurement, delegated authority is not given to the Corporate Director in	<ul style="list-style-type: none"> <li>▪ The principle of this delegation is stated throughout the Council's Contract Procedure Rules (and specifically at Section 3.5) and is</li> </ul>	Green

Risk Description	Mitigations	RAG Status
consultation with the Director of Finance and Assurance (S151 Officer) and also the Portfolio Holder responsible for the programme to commence each procurement and to award all contracts under the programme	required practice and is utilized to ensure the lean and efficient delivery of procurement projects and programmes	
Cabinet reports seeking approval for a procurement for the acquisition of works, goods or services are not accompanied by the tender documents and a recommendation seeking approval of the tender documents	<ul style="list-style-type: none"> <li>▪ It will be a requirement of the Contract Procedure Rules to have the relevant tender documents appended to the cabinet report as a background paper (see also Recommendation 1 above)</li> </ul>	Green
Procurement commences later than the 8-week period with no prior approval for an extension of the 8-week period	<ul style="list-style-type: none"> <li>▪ The requirement for this approval will be in the Contract Procedure Rules (see Recommendation 1 above)</li> <li>▪ Where delays are experienced, those officers given delegated authority to make awards must be kept informed further to Contract Procedure Rules</li> </ul>	Green
All commencement and award approvals do not follow the procurement gateway process.	<ul style="list-style-type: none"> <li>▪ All commencement and award approval are strictly governed by the Contract Procedure Rules and the Financial Regulations which outline the procurement reporting process and the scheme of delegation, and any non-compliance is a fundamental breach of these rules</li> </ul>	Green
The procurement team fail to undertake an annual check on all expenditure falling under the £100,000 limit to ensure compliance and value for money have been achieved.	<ul style="list-style-type: none"> <li>▪ The annual check will become part of our business-as-usual approach to procurement and the requirement to undertake the check will</li> </ul>	Green

Risk Description	Mitigations	RAG Status
	<p>be included in our annual service plan.</p> <ul style="list-style-type: none"> <li>▪ As the check is included in our service plan the annual check will also be cascaded down to staff work plans</li> </ul>	

## Procurement Implications

There are no direct or immediate procurement implications insofar as they relate to the Public Contracts Regulations 2015 arising from the recommendations set out at the beginning of this report. However, all tendering projects and procurement awards resulting from the procurement programme included in this report under Appendix 1 will be undertaken only after the requisite internal governance approvals have been received. All procurement activity must be compliant with the Public Contracts Regulations 2015, the Council's Contract Procedure Rules and Financial Regulations.

The impact of the recommendations will be a change in working practices for those involved in the delivery of the procurement programme. Officers engaged in the development of the component parts that together make up the tender documents will need to ensure that engagement of portfolio holders is at its highest in the design and development pre-procurement phase.

All communication should be through approved formal channels set up for the procurement.

Secondly, all reports that Cabinet need to approve in the procurement programme will have the procurement implications set out for the specific tendering project as well as a new standard recommendation as per the guidance as follows:

Officers when submitting cabinet reports are requested to use the following form of words:

Cabinet is recommended to:

- approve the commencement of a procurement process for the provision of X. The term of any future contract award following a competitive and compliant procurement exercise will be Y years plus an additional Z years extension option.
- approve the tender documents.
- delegate authority to the Corporate Director for X, in consultation with the Portfolio Holder responsible for the Service, to make any changes required to the tender documents following approval.

- delegate authority to the Corporate Director for X in consultation with the Director of Finance, the Portfolio Holder for the Service and the Portfolio Holder for Finance and Human Resources to award the contract.

## **Legal Implications**

All council procurement must be carried out fairly and transparently and where relevant in compliance with The Public Contracts Regulations 2015 (PCR) and the council's Contract Procedure Rules and Financial Regulations.

Members can engage with and influence the procurement process but, like officers, must comply with the procurement principles set out in the PCR. These are to treat economic operators equally and without discrimination and to act in a transparent and proportionate manner. They must not seek to design the procurement with the intention of unduly favouring or disadvantaging certain economic operators.

Confidentiality must be appropriately maintained at all times

The council must take appropriate measures to effectively prevent, identify and remedy conflicts of interest arising in the conduct of procurement procedures so as to avoid any distortion of competition and to ensure equal treatment of all economic operators. For these purposes, the concept of conflicts of interest shall at least cover any situation where relevant staff members or councillors have, directly or indirectly, a financial, economic or other personal interest which might be perceived to compromise their impartiality and independence in the context of the procurement procedure.

Contracts must be awarded to the most economically advantageous tender as determined by applying the published selection and evaluation criteria to the tender fairly, transparently, and in a non-discriminatory way.

Selection criteria may relate to:

- (a) suitability to pursue a professional activity
- (b) economic and financial standing
- (c) technical and professional ability

Contract award criteria must be linked to the subject-matter of the contract.

The council must specify, in the tender documents, the relative weighting which it gives to each of the criteria chosen to determine the most economically advantageous tender, except where this is identified on the basis of price alone.

## **Financial Implications**

There are no financial implications arising from the recommendations set out at the beginning of this report. The procurement governance process requires, as mandatory, finance to approve availability of budgets prior to a tender process proceeding or an award of contract being made.

The Financial Regulations currently delegate the power to award contracts as set out below:

<b>Delegation</b>	<b>Award of Contract (Total Value over life of Contract)</b>	<b>Counter signature (*)</b>
Cabinet	Over £500,000	
Head of Paid Service OR Chief Financial Officer	£250,000 to £499,999	Portfolio Holder for Finance and Human Resources
Corporate Director / Director of Finance	£100,000 to £249,999	
Director (D grades)	£50,000 to £99,999	
'M' grades	£25,000 to £49,999	
'G9 to G11' grades	£0 to £24,999	

Financial due diligence is also undertaken on all companies we intend to contract with to ensure they have the financial strength to deliver the contract.

### **Equalities implications / Public Sector Equality Duty**

An Equalities Impact Assessment is not required for the recommendations set out in this report. An equalities impact assessment will be undertaken for procurements that are part of the programme of procurement detailed in this report.

## **Section 3 - Statutory Officer Clearance**

**Statutory Officer: Dawn Calvert**

Signed by the Chief Financial Officer

**Date: 23 February 2023**

**Statutory Officer: Stephen Dorrian**

Signed on behalf of the Monitoring Officer

**Date: 15 February 2023**

**Chief Officer: Dawn Calvert**

Signed on behalf of the Chief Executive

**Date: 23 February 2023**



**Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 23 February 2023**

**Head of Internal Audit: Neale Burns**

Signed on behalf of the Head of Internal Audit

**Date: 1 March 2023**

### **Mandatory Checks**

**Ward Councillors notified: NO**

**EqIA carried out: NO**

An Equalities Impact Assessment is not required for the recommendations set out in this report. An equalities impact assessment will be required for procurements that are in scope of the recommendations of this report.

**EqIA cleared by: N/A**

### **Section 4 - Contact Details and Background Papers**

**Contact:** Nimesh Mehta, Head of Procurement, Tel. 07949 054 739, Email: [Nimesh.Mehta@harrow.gov.uk](mailto:Nimesh.Mehta@harrow.gov.uk)

**Call-in waived by the Chair of Overview and Scrutiny Committee  
- NO**

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# **Contract Procedure Rules**

## **February 2023**

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**Table 1: Authorisation and Acceptance Thresholds**

<b>Total Spend/Aggregate Contract Value (including VAT)</b>	<b>Procurement Process</b>	<b>Documentation Required</b>	<b>Authorisation under Scheme of Delegation for Award of Contract</b>
<p>Low Value non-recurring spend up to £1,500</p> <p>Upper Limit for Petty Cash and cheques is £250</p>	<p>Procurement Cards should be used in accordance with the Procurement Card policy.</p> <p>In accordance with the Petty Cash and Cheque policy.</p>	<p>Receipts must be kept as evidence of purchase.</p>	<p>Not Applicable</p>
<p>REQUEST FOR QUOTATION</p> <p>£0-£49,999</p>	<p>Minimum 1 Quotation required for purchases up to £4,999 which must be from a Local Business</p> <p>Minimum 3 Quotations required for purchases between £5,000 up to £49,999 of which at least 1 must be from a Local Business</p> <p>Please note that you must include VAT in the value before determining your procurement route</p>	<p>Quotation must be attached to the requisition in D365</p> <p>Mosaic – manual copies of Quotations / Contracts must be kept on file.</p> <p>As a minimum the council's Very Low Value Terms and Conditions of Contract must be issued with the purchase order.</p>	<p>Grade 9 – Grade 11 For purchases up to £24,999</p> <p>Management Grade For purchases from £25,000 to £49,999</p>
<p>TENDER PROCESS</p> <p>£50,000 – £99,999</p>	<p>Procurement can be consulted.</p> <p>Please note that you must include VAT in the value before determining your procurement route</p> <p>Minimum 3 proportionate tenders required from suitable Suppliers. At least 1 must be from a Local Business.</p>	<p>A written Contract must be signed by the Council and the Supplier.</p> <p>No Selection Questionnaire (SQ) Required: Suitability Assessment Questions only</p>	<p>Director Grade</p>

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<p>TENDER PROCESS</p> <p>PROCUREMENT INVOLVEMENT IS MANDATORY</p> <p>£100,000 - £249,000</p>	<p>Please note that you must include VAT in the value before determining your procurement route</p> <p>Authority to procure must be obtained <u>prior to any tender activity commencing by completing a Procurement Gateway 1 report. The Directorate Procurement Board must be consulted on the report before obtaining approval from the relevant Director exercising their delegated powers.</u>  <del>by the relevant Director exercising their delegated powers and completing a Procurement Gateway 1 report and consulting the Directorate Procurement Board on seeking clearance - this report from the Directorate Procurement Board prior to any tender activity commencing.</del></p> <p><u>The procurement Mm</u> must be advertised and tendered via the London Tenders Portal and Contracts Finder.</p> <p>Procurement of supplies, services and works over the current Financial Thresholds* requires a UK Notice and advertising.</p> <p><u>Authority to award must be obtained prior to any supplier being given a contract, by completing a Procurement Gateway 2 report. The Directorate Procurement Board must be consulted on the report before obtaining approval from the relevant Director exercising their delegated powers. When required Standstill Period must be observed prior to award of Contract.</u></p> <p><del>Approval to award must be obtained by the relevant Director exercising their delegated powers and completing a Procurement Gateway 2 award report and consulting seeking clearance from the Directorate Procurement Board on this report. and subsequently signed approval from the relevant Scheme of Delegation signatories. When required Standstill Period must be observed prior to award of Contract.</del></p>	<p><u>Procurement Gateway 1 report – Authority to Procure</u></p> <p>UK Notice to be Published (if applicable) and Contracts Finder advert</p> <p>SQ only required for procurement above Financial Thresholds</p> <p>Invitation to Tender documents which will include Terms and Conditions of Contract; Service Specification; Method Statement Questions; Pricing Document; Information to Tenderers including clear evaluation criteria and sub criteria.</p> <p><u>Procurement Gateway 2 – Award Report</u></p> <p>UK Notice to be Published on FTS (if applicable) and Contracts Finder Contract Notice and Contract Award Notice</p> <p>The Council’s Terms and Conditions of Contract must be approved and sealed by the Director of Legal and Governance Services.</p> <p>The master signed and sealed copies must be sent to the Corporate Procurement Team. A master copy will then be sent to the Supplier and one master retained by the Corporate Procurement Team,</p>	<p>Corporate Director Grade</p>
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<b>Total Spend/Aggregate Contract Value</b>	<b>Procurement Process</b>	<b>Documentation Required</b>	<b>Authorisation under Scheme of Delegation for Award of Contract</b>
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<p>TENDER PROCESS</p> <p>PROCUREMENT INVOLVEMENT IS MANDATORY</p> <p>£250,000 - £499,999</p>	<p>Please note that you must include VAT in the value before determining your procurement route</p> <p>The Directorate Portfolio Holder and the Portfolio Holder with responsibility for Finance and <u>Human</u> Resources must be consulted at the pre procurement planning stage. <u>[See Section 14]</u></p> <p><u>Authority to procure must be obtained prior to any tender activity commencing by completing a Procurement Gateway 1 report. The Directorate Procurement Board must be consulted on the report before obtaining approval from the relevant Director exercising their delegated powers.</u></p> <p><del>Approval to procure should be obtained by completing the relevant director exercising their delegated powers and completing a Procurement Gateway 1 report and consulting seeking clearance from the Directorate Procurement Board prior to any tender activity commencing.</del></p> <p>Must be advertised and tendered via the London Tenders Portal and Contracts Finder.</p> <p>Procurement of supplies, services, and works over the current Financial Thresholds <del>and</del> requires a UK Notice and advertising.</p> <p><u>Authority to award must be obtained prior to any supplier being given a contract, by completing a Procurement Gateway 2 report. The Directorate Procurement Board must be consulted on the report before obtaining approval from the relevant Director exercising their delegated powers. When required Standstill Period must be observed prior to award of Contract.</u></p> <p><del>Approval to award must be obtained by the relevant director exercising their delegated powers and completing a Procurement</del></p>	<p><u>Procurement Gateway 1 – Authority to Procure</u></p> <p>UK Notice to be Published on FTS (if applicable) and Contract Finder advert (if applicable)</p> <p>SQ required.</p> <p>Invitation to Tender documents which will include: Terms and Conditions of Contract; Service Specification; Method Statement questions; Pricing document; Information to Tenderers including clear evaluation criteria and sub criteria.</p> <p><u>Procurement Gateway 2 – Award Report</u></p> <p>UK Notice to be Published on FTS (if applicable) and Contracts Finder Contract Notice and Contract Award Notice</p> <p>The Council's High Value Terms and Conditions of Contract must be approved and sealed by the Director of Legal and Governance Services.</p> <p>The master signed and sealed copies of Contract must be sent to the Corporate Procurement Team. One master copy will then be sent to the Supplier, and one retained by the Corporate Procurement Team.</p> <p>Page 6 of 34</p>	<p><del>Portfolio Holder with responsibility for Finance and Resources.</del></p> <p>ONE OF THE FOLLOWING:</p> <p>Chief Executive</p> <p>Director of Finance</p> <p><u>Counter Signature</u></p> <p><u>Portfolio Holder with responsibility for Finance and Human Resources.</u></p>
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Total Spend/Aggregate Contract Value	Procurement Process	Documentation Required	Authorisation under Scheme of Delegation for Award of
<p>TENDER PROCESS</p> <p>PROCUREMENT INVOLVEMENT IS MANDATORY</p> <p>£500,000+ and all Key Decisions</p>	<p>Please note that you must include VAT in the value before determining your procurement route</p> <p>The Portfolio Holder with responsibility for Finance and <u>Human</u> Resources must be consulted at the pre procurement planning stage. <a href="#">[See Section 14]</a></p> <p>Directorate Portfolio Holder must be consulted throughout the commissioning planning and procurement phase of the project. <a href="#">[See Section 14]</a></p> <p>Approval to procure should be obtained by completing <a href="#">a cabinet report and having a Cabinet decision</a> prior to any tender activity commencing.</p> <p>Must be advertised and tendered via the London Tenders Portal and Contracts Finder.</p> <p>Procurement of supplies, services and works over the current Financial Thresholds requires a UK Notice and advertising.</p> <p>Approval to award must be obtained by a Cabinet decision to make an award of Contract.</p> <p>When required Standstill Period must be observed prior to award of Contract.</p>	<p>The Procurement must be recorded on the Key Decisions Forward Plan. Cabinet <a href="#">authority Report</a> – Seeking mandate to commence procurement <a href="#">must be obtained</a>. This report must be cleared by the Portfolio Holder for the service and the Portfolio Holder for Finance and Human Resources before it is submitted to Cabinet for approval.</p> <p>UK Notice to be Published on FTS (if applicable) and Contracts Finder Advert. An SQ is required.</p> <p>Invitation to Tender Documents which will include: Terms and Conditions of Contract; Service Specification; Method Statement Questions; Pricing Document; Information to Tenderers including clear evaluation criteria and sub criteria.</p> <p><del>The</del> Cabinet report seeking approval to award a Contract. <del>This report</del> must be cleared by the Portfolio Holder for the service and the Portfolio Holder for Finance and <u>Human</u> Resources before it is submitted to Cabinet for approval.</p> <p>Where delegated authority to award <a href="#">is being requested then the delegations requested must be as set out in the next column. has been obtained, this should be documented via a</a> Gateway 2 award report <a href="#">must be writtend where delegated authority to award exists.- must be cleared by the delegated authorities as approved by Cabinet.</a></p> <p>UK Notice to be Published (if applicable) and Contracts Finder Contract Notice and Contract Award Notice</p> <p>The Council's High Value Terms and Conditions of Contract must be approved and sealed by the Director of Legal and Governance Services. The master signed and sealed copies of Contract must be sent to the Corporate Procurement Team. One master copy will then be sent to the Supplier, and one retained by the Corporate Procurement Team.</p>	<p>Cabinet</p> <p><a href="#">When delegated authority to award has been approved by Cabinet then the Corporate Director responsible for the contract that has been given the delegation to award must do so in consultation with the PH for the service area and the PH for Finance and Human Resources</a></p>

**Table 2: Waiver Approval Process**

Waiver Value	Documents required for waiver approval	Waiver approval
£25,000 - 99,999	<p>Please complete the online waiver form well in advance of when you wish to engage the Supplier. The waiver form can be accessed via the Hub. Please see link below:</p> <p><a href="#">Waivers</a></p> <p>Waiver requests for the same Supplier and service after the first that results in the aggregate value of the waiver going over £100,000 will need to follow the waiver approval process in the band below.</p>	<p>1) Divisional Director; and</p> <p>2) Head of Procurement or Procurement Business Partner from the Corporate Procurement Team</p>
Over £100,000	<p><u>Authority to award must be obtained prior to any supplier being given a contract, by completing a Procurement Gateway 2 report. The Directorate Procurement Board must be consulted on the report before obtaining approval from the relevant Director exercising their delegated powers.</u></p> <p>Waiver requests for the same provider and service that results in the aggregate value of the waivers going over £500,000 will need to follow the waiver approval process in the band below.</p>	<p>£100,000&gt;£249,000 Corporate Director</p> <p>£250,000&gt;£499,999 CEO or Director of Finance and the Portfolio Holder with responsibility for Finance and <u>Human</u> Resources</p>
Over £500,000	<p>Cabinet report– Seeking mandate to award through waiver – must consult the Directorate Procurement Board prior to Cabinet submission for approval as a Key Decision.</p>	<p>Cabinet</p>
<p>Please note: Where a waiver is necessary because of an unforeseeable emergency involving immediate risk to persons, property or serious disruption to Council services, a corporate director may authorise the recommendations of the waiver immediately. Where a Procurement Gateway 2 award report documenting the exercise of delegated powers or a Cabinet report is required this should subsequently be submitted to the relevant Procurement Board and/or Cabinet for noting. Decisions over the Key Decision threshold will need to be decided via the Leader acting as urgent Cabinet.</p> <p>Waivers from compliance with Public Contracts Regulations 2015 cannot be granted.</p>		

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**Key Requirements:**

\*To find Local Businesses in Harrow, please follow this link to access the Harrow Business Directory.

[Local Business Directory](#)

- No commitment must be given to a Supplier for Supplies or Services prior to a Purchase Order being raised. Please see 5.13 of these CPRs.
- Financial disaggregation of Estimated Procurement Value to avoid compliance with these and the Public Contracts Regulations 2015 is prohibited.
- Contracts, whether income or expenditure, should be captured on the Council’s Contracts Register as required by the Transparency Code.
- Equality Impact Assessments must be carried out where there could be equalities implications.
- For the procurement of Care Spot Placements: People Services Directorate please see 6.8 of these CPRs.
- Contract awards under the rules of a Framework Agreement only require a Cabinet report or Gateway 2 report for approval of award recommendations.

The Financial Threshold above which the Public Contracts Regulations must be applied are.

£213,447 (Inc VAT) Supplies and Services

£663,540 (Inc VAT) Light Touch Services

£5,336,937 (Inc VAT) Works and Concessions

**Contract Variation or Extension Acceptance**

**Extensions and Variations**

**Below Financial Threshold**

- If no significant change in scope and costs are within 10% of Contract value - extend with relevant Budget Holder approval
- If costs are above 10% of Contract Value - a waiver approval will be required.

**Above Financial Threshold**

- If no significant change in scope and costs are within 10% of the Estimated Procurement Value - extend with approval of relevant Budget Holder & Head of Procurement and/or Procurement Business Partner.
- If costs are above 10% seek advice from Head of Procurement and/or Procurement Business Partner and Legal because there may be a legal requirement to advertise again to the market.
- Note that it is only possible to vary a Contract awarded following a procurement fully regulated by the Public Contracts Regulations in limited circumstances (including where the variation or extension option was clearly set out in the original UK Notice and in the Contract). Seek advice from the Procurement Business Partner and HB Public Law in these cases.

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## 1 PREAMBLE

- 1.1 The Council's Contract Procedures Rules are designed to ensure that stewardship and probity are maintained within the Council and that Approved Officers obtain Best Value services and economic, social and environmental value from purchasing arrangements. [The Council should follow the Best Value Statutory Guidance: Best value statutory guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/guidance/best-value-statutory-guidance)
- 1.2 These Contract Procedure Rules should be read in conjunction with the Council's Financial Regulations which set out mandatory financial procedures to be followed. These can be found [here](#)
- 1.3 These Contract Procedure Rules are designed to ensure compliance with the Council's Constitution, Council policies, Public Contracts Regulations 2015 and English law.
- 1.4 Tables 1 and 2 at the beginning of this document set out in summary the key requirements that must be adhered to. However, you are strongly advised to refer to the rest of this document for further guidance and to seek the advice and support of the Corporate Procurement team and HB Public Law as appropriate.

## 2 INTRODUCTION

- 2.1 The Council is responsible for spending substantial public funds and managing other assets and has a duty to demonstrate high standards of probity and stewardship in the day-to-day management of its affairs. [To that end it is expected that our day-to-day duties are conducted consistent with the Seven Principles of Public Life<sup>1</sup>](#)
- 2.2 The Council purchases Supplies, Services and Works from the private, independent and third sector as well as from other public bodies. The process of identifying what and why we buy, how much we buy, from whom and at what price is extremely important and we have a duty to ensure this process is underpinned by the requirements of the Public Contracts Regulations which include equality of treatment, transparency and non-discrimination. Commissioning and Procurement decisions are amongst the most important the Council makes because we are spending public money and therefore are publicly accountable.
- 2.3 The Council has a responsibility to ensure that, as a minimum, Supplies, Works and Services are of good quality and are competitively but sustainably priced.
- 2.4 Effective, efficient and economic use of resources in order to achieve Best Value is a statutory duty. In working to achieve Best Value, the Council must consider overall value, including economic, environmental and social value. This requirement is embodied in the Public Services (Social Value) Act 2012 for Services Contracts above the Financial Threshold and in the Council's Social Value Policy for other Contracts.
- 2.5 The Council and its officers must always act responsibly and with utmost integrity and comply with statutory requirements. Council officers must always act transparently and avoid acting in an unfair and discriminatory way.

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<sup>1</sup> [The Seven Principles of Public Life - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/organisations/civil-servants/about-the-seven-principles-of-public-life)

- 2.6 If officers fail to comply with these Contract Procedure Rules, which lay down minimum mandatory requirements when engaging in procurement activity, disciplinary action may be considered.
- 2.7 Members and Council employees have a duty to report breaches of Contract Procedure Rules to an appropriate senior manager and the Head of Procurement. Noncompliance with the Contract Procedure Rules will be monitored by Directorate Procurement Boards.
- 2.8 Unless the context otherwise requires, terms used in these Contract Procedure Rules have the meanings set out in the Definitions and Interpretation section.

### 3 APPLICATION

- 3.1 The Contract Procedure Rules provide the governance structure within which the Council may procure Works, Supplies and Services. The aims of these Contract Procedure Rules are to ensure:
  - 3.1.1 Commitment to the principles of transparency, fairness, proportionality, and equal treatment within the procurement process.
  - 3.1.2 Value for Money and propriety in the spending of public money.
  - 3.1.3 That works, supplies and services are delivered effectively and efficiently without compromising the Council's ability to take strategic decisions.
  - 3.1.4 That the Council is not exposed to unnecessary legal, financial, or reputational risk and challenge arising from non-compliant procurement.
  - 3.1.5 Compliance with legislation, and relevant guidance including Procurement Policy Notes issued by the Cabinet Office.
  - 3.1.6 The delivery of the Council's vision and priorities:
    - The delivery of a well-run Council providing good value for money for all.
    - A Council that Puts Residents First
    - A Borough that is Clean and Safe
    - A Place where those in Need are Supported.
- 3.2 The Governance, Audit Risk Management and Standards Committee (GARMS) and the Constitution Review Working Group (CRWG) may, from time to time, recommend to Cabinet and Council changes to the financial thresholds set out in these Contract Procedure Rules.
- 3.3 The Director of Legal and Governance Services in consultation with the Head of Procurement is permitted to undertake an annual refresh to this document without having to seek CRWG and Cabinet approval. These include any changes required because of a change in law and all non-material changes. This must be done in consultation with the Portfolio Holder with responsibility for Finance and Human Resources to inform them of these changes including what impact they have on the Council.

- 3.4 The Head of Procurement in consultation with the Director of Finance shall maintain and issue the Contract Procedure Rules and the Procurement Strategy. The Contract Procedure Rules take precedence over the Procurement Strategy.

#### SCHEME OF DELEGATION, CONFIDENTIALITY AND DECLARATION OF INTEREST

- 3.5 -All award of Contracts can only be approved by the Scheme of Delegation as stipulated in the Financial Regulations and set out in table 1 at the front of these CPRs. Awarding a contract without prior approval of the requisite approver as set out in these CPRs and the Financial Regulations is a disciplinary offence.
- 3.6 Where there is inconsistency between these Contract Procedure Rules and the Financial Regulations, the latter take precedence. Please report any inconsistencies in writing to the Director of Finance and the Head of Procurement.
- 3.7 All officers **and members** must take appropriate measures to protect confidentiality and effectively prevent, identify and remedy conflicts of interest arising in the conduct of Procurement procedures to avoid any distortion of competition and to ensure equal treatment of all suppliers. If you are involved in a procurement project, you must ensure you sign a confidentiality agreement and a declaration of interest. A declaration does not automatically exclude anyone from the procurement process, it alerts the procurement leads and allows them to manage the procurement accordingly.

#### PRE-PROCUREMENT MARKET ENGAGEMENT

- 3.8 Where a Supplier or an undertaking related to a Supplier, has advised the Council, or has otherwise been involved in the preparation of the Procurement procedure, the Council must take appropriate measures to ensure that competition is not distorted by the participation of that Supplier in the Procurement.

➤ The Council must not:

give any one potential Supplier an advantage in bidding over another Supplier or engage in a way that disadvantages one particular Supplier or group of potential Suppliers.

as a result of the early market engagement, shape the procurement and the Council's requirements in favour of any one particular potential Supplier or solution.

- 3.9 Unrestricted and full direct online access free of charge to the procurement documents must be available from the date of the publication in Find a Tender Services of a UK Contract Notice or the date on which an invitation to confirm interest is sent.

## 4 SCOPE

- 4.1 The Contract Procedure Rules apply to all Procurement activities, including the spending of income or funding received by the Council from external sources.
- 4.2 Where the Council is entering into a Contract as an agent and/or in collaboration with another public body or organisation, these Contract Procedure Rules apply only in so far as they are consistent with the requirements of the organisation with whom we are collaborating. Where the Council is acting as principal the Contract Procedure Rules will take precedence.
- 4.3 The Scheme for Financing Schools 2013 requires schools under Council control to comply with these Contract Procedure Rules.
- 4.4 Framework Agreements that have been established by other Public Sector Bodies that are lawfully accessible to the Council should be used in accordance with the terms and conditions of the relevant Framework Agreement. Contracts awarded under the rules of a Framework Agreement only require a Cabinet report or Gateway 2 report for approval of award recommendations.
- 4.5 The following are out of scope of the Contract Procedure Rules:
  - 4.5.1 Social Care Residential and Nursing Care Spot Placement (see section 6.8)
  - 4.5.2 Any purchase or sale of a property, interest in land, transaction in land and or lease transaction but this must be authorised in accordance with the requirements set out in the Constitution and, specifically, the Management of Asset, Property and Land Rules.
  - 4.5.3 Procurement of Services from other public bodies where it can be evidenced that the body is the only supplier of the Services.
  - 4.5.4 The awarding of grants. However, council officers should always ensure the principles of openness, fairness, non-discrimination, [compliance with the public sector equality duty](#) and Value for Money apply.

## 5 ROLES AND RESPONSIBILITIES

The Corporate Director with the support of the Head of Procurement is accountable for all Procurement activity in their directorate. Their duties are to ensure:

- 5.1 Compliance with the Public Contracts Regulations 2015, Financial Regulations, Contract Procedure Rules and the Procurement Strategy.
- 5.2 Compliance with the Local Government Transparency Code October 2015 issued by the Department for Communities and Local Government.
- 5.3 Compliance with the Contract Procedure Rules for their Directorate's Procurement activity.
- 5.4 That no Procurement over the specified threshold commences without the approval of a Procurement Gateway 1 report at the appropriate Procurement Board. A Cabinet report and authority is required for all Procurements over £500,000 or where the Procurement



is defined as a Key Decision. (See Table 1)

- 5.5 That no commitment to award a Contract with a Supplier over the specified threshold is made without a Procurement Gateway 2 award report [documenting the exercise of delegated powers](#) having been [considered](#) at the appropriate Procurement Board and having been signed off under the [Financial](#) Scheme of Delegation. A Cabinet report [and authority](#) is required for all procurement over £500,000 or where the Procurement is defined as a Key Decision. (See Table 1)
- 5.6 A Gateway 2 award report does not need to be written where approval of an award is required from Cabinet. However, all Cabinet reports must be [considered](#) ~~approved~~ by the Directorate Procurement Boards as part of their journey to Cabinet for approval. However, where Cabinet has delegated authority [to an officer](#) to make an award decision then a Gateway 2 report will need to be written [to document the exercise of this delegation](#) and taken to the relevant Directorate Procurement Board ~~and the award approved by the delegated signatories~~.
- 5.7 That Works, Supplies and Services delivered or provided by Suppliers for the Council are approved and covered by suitable Council terms and conditions of Contract so that the responsibilities of each party are clear.
- If it is deemed necessary to sign up to third party terms and conditions of contract legal advice must be sought from HB Public Law on all legally binding Contracts entered by the Council.
- 5.8 That the ten calendar days Standstill Period between the Contract award decision and Contract signature is observed where required to do so. The 10-day period ends at midnight following the tenth day. If the 10<sup>th</sup> day is a weekend, then the period is extended to the next working day. Seek procurement and legal advice on this matter.
- 5.9 Ensure that Contract terms and conditions to be used in Procurement have been approved by the Director of Legal and Governance Services.
- 5.10 That they use their best endeavours to ensure that no Contract commences prior to the Terms and Conditions of Contract being signed and, where necessary, sealed.
- 5.11 That all master copies of Contracts are delivered to the Procurement Team.
- 5.12 That all Key Decisions as defined in Article 13 of the Constitution are recorded on the Council's Forward Plan.

## PURCHASE ORDERS

- 5.13 It is mandatory under section D42 of the Financial Regulations to raise Purchase Orders on the Corporate Financial System prior to procuring Works, Supplies and Services, unless an exemption is approved by the Director of Finance. [It is a serious breach of the Financial Regulations and CPRs to engage with suppliers and to order the provision of Goods, Works or Services without the appropriate approvals to do so. No order must be made without raising a purchase order to the value of the purchase. The Purchase Order Number must also be referenced on the invoices.](#)

If you raise a PO via 'describe what you need' and this is approved by a budget manager and procurement; and you then need to make an amendment, the amendment **MUST NOT** take the Net Value over £25k. If the value is taken over £25,000 it is a **serious breach** of the CPRs and Financial Regulations.

The Services exempt [when required to be] from this rule are:

- Sexual Health (GUM) Services
- Emergency and immediate spot placement of residential and nursing services;
- Barrister Fees; Court Order Disbursements; and Law Library Encyclopaedia

- 5.14 that all Contracts are awarded based on the *Most Economically Advantageous Tender (MEAT)*. The MEAT shall be assessed from the Council's point of view, on the basis of the price or cost, using a cost-effectiveness approach, such as Life-Cycle Costing, and may include the best price-quality ratio, which shall be assessed on the basis of criteria, such as qualitative, environmental and/or social aspects, linked to the subject-matter of the Contract.
- 5.15 Identify, evaluate, record and appropriately mitigate risk (e.g., provision of performance bond, parent company guarantee and appropriate payment provisions and termination clauses within Contracts).
- 5.16 that all Invitation to Tender documents clearly describe the Evaluation Criteria, sub criteria and weighting and that the tender evaluation is based strictly on the published criteria and weighting.
- 5.17 That Evaluation Criteria require the bidder to state how they will meet social value and environmental considerations (for example - employment, training, apprenticeships, use of SME's and local Suppliers). Please see the Social Value Policy for guidance.
- 5.18 The Council has declared a climate emergency and has committed to working towards becoming a carbon neutral organisation by 2030. All tendering must evaluate Suppliers on their ability to deliver greenhouse gas emission reductions, with a minimum 5% weighting of the total evaluation criteria. Consideration should be given to increasing this percentage in relation to Works, Goods and Services with a high carbon impact. Opportunities for carbon reduction should also be considered in lower value procurement that is not subject to formal tendering. If required, please seek the advice of the Head of Procurement and Head of Natural Resources and Climate.
- 5.19 Immediate corrective action is taken in the event of a breach of the Contract Procedure Rules with the support of the Corporate Procurement Team and HB Public Law.
- 5.20 That their Directorate works closely with the Corporate Procurement Team to develop category strategies and plan and deliver a programme of Procurement delivery which includes all commissioning intentions and planned Procurement activity and that this is monitored and refreshed on an annual basis.
- 5.21 That the use of the FB60 method of payment is consistent with the guidance set out by the unsupported payments procedure note within the Financial Regulations.
- 5.22 That Contracts are not artificially underestimated or disaggregated into two or more

separate Contracts where the intent is to avoid the application of the Contract Procedure Rules or The Public Contracts Regulations

- 5.23 That Suppliers explain the price or costs proposed in the tender where tenders appear to be abnormally low in relation to the Works, Supplies or Services. This is a legal requirement under The Public Contracts Regulations 2015.

## 6 AUTHORISATION

- 6.1 All Procurement over £100,000 requires the engagement of the Corporate Procurement Team and HB Public Law.
- 6.2 Finance, Procurement, Legal and, where appropriate Audit, ICT **and Planning** clearance must be obtained within reports before they are submitted to Procurement Boards or Cabinet.
- 6.3 A Procurement Gateway 1 report documenting the exercise of delegated powers or Cabinet report (see Table 1) for commencement of a Procurement activity must be considered, presented and approved by the respective Procurement Board and Cabinet.
- 6.4 A Procurement Gateway 2 report or Cabinet report (see Table 1) for contract award must be presented to and approved/considered by the respective Procurement Board and Cabinet.
- 6.5 Any Procurement must be authorised in accordance with the Scheme of Delegation as published within the Financial Regulations.
- 6.6 All Service Leads must consider whether it is appropriate to complete an Equalities Impact Assessment.
- 6.7 A partnership arrangement must not be used as a means of avoiding the Contract Procedure Rules or The Public Contracts Regulations. All new partnership arrangements are required to be reported as required by section E7 of the Financial Regulations. This clause is not applicable to the award of grant payments.
- 6.8 Procurement of Social Care Spot Placements: People Services Directorate
- 6.8.2 A general waiver is granted so that there is no need to tender such requirements acknowledging at all times that the Council has a duty to achieve Best Value in making such placements.
- 6.8.3 The Corporate Director of People Services must have in place a process that requires the approval of a Head of Service or a more senior Council officer for all new placements where the annual value of a placement is likely to exceed £62,500.
- 6.8.4 All new placements where the annual value is likely to exceed £125,000 require the approval of the relevant Statutory Director.
- 6.8.5 All new placements where the annual value exceeds £250,000 require the above approvals of the relevant Statutory Director and the Portfolio Holder with responsibility for the respective department must be consulted.

6.8.6 The Corporate Director of the Peoples Directorate must, as a minimum, annually review all care placements (existing and new) in order to continue to demonstrate Value for Money and Best Value. A report will be required to be presented to the Directorate Procurement Board annually on the completion of the review.

## 7 PROCUREMENT METHOD

- 7.1 Approved Officers must treat Suppliers equally and without discrimination and must act in a transparent and proportionate manner.
- 7.2 Before commencing a Procurement procedure Approved Officers may conduct market consultations with a view to preparing the Procurement and informing Suppliers of their Procurement plans and requirements provided that it does not have the effect of distorting competition and does not result in a violation of the principles of non-discrimination and transparency. Officers may, for example, seek or accept advice from independent experts or authorities or from market participants. [See 3.8 above]
- 7.3 The default position in acquiring Works, Supplies and Services should always be through competition, that is through competitive tendering. Please refer to Table 1 of these Contract Procedure Rules to determine the Procurement process that should be used. The Procurement Team must be involved and engaged on the Procurement strategy/approach to be adopted for all purchases over £100,000. Similarly, the Economic Development Team must be consulted on promoting opportunities to local companies through Business Newsletters and Supplier Events.
- 7.4 The E-Procurement portal can be used for any Procurement where the lifetime value of the Contract exceeds £ 50,000.
- 7.5 The use of Selection Questionnaires is only required for contract values above the Financial Threshold. Suitability Assessment Questions may be asked as appropriate for contract values below the Financial Threshold.
- 7.6 The Head of Procurement must approve accessing externally established Framework Agreements. Approval for subsequent call-offs from the approved Framework Agreements will be subject to the requirements of these Contract Procedure Rules and compliance with the rules for call-off set out in the Framework Agreement.
- 7.7 Officers may decide to award a Contract in the form of separate lots and may determine the size and subject matter of such lots. They must document the main reasons for their decision not to subdivide into lots in the gateway reports.

## 7.8 Concession Contracts

The Concession Contracts Regulations 2016 (CCR) apply to the award of Works Concession Contracts or Services Concession Contracts above £5,336,937 (Inc VAT)

Concession Contracts must meet the following requirements:

- The award of the contract involves the transfer to the concessionaire of an operating risk in exploiting the Works or Services encompassing demand or supply risk or both.
- The part of the risk transferred to the concessionaire involves real exposure to the vagaries of the market, such that any potential estimated loss incurred by the concessionaire is not merely nominal or negligible. The concessionaire shall be deemed to assume operating risk where, under normal operating conditions, it is not guaranteed to recoup the investments made or the costs incurred in operating the Works or the Services which are the subject-matter of the Concession Contract

The same general principles that apply to other procurement rules apply to the award of Concession Contracts. In particular, the Council must treat providers equally and without discrimination and must act in a transparent and proportionate manner.

Seek advice from Corporate Procurement Team and HB Public Law if you consider that you might want to award a Concession Contract

## 8 INFORMATION GOVERNANCE

- 8.1 When procuring, the responsible Council officer must ensure Due Diligence checks are carried out to provide sufficient guarantees that the Supplier's technical and organisational security measures for handling and protecting information and data are appropriate, suitable, and lawful. This is a requirement under Principle 7 of the Data Protection Act.
- 8.2 Evidence of these checks, copies of policies and guarantees provided by the Supplier must be retained by the Council officer responsible for management of the Contract and be regularly reviewed throughout the life of the Contract.
- 8.3 Contract managers must ensure appropriate security measures are applied to prevent the unauthorised or unlawful processing of personal data or accidental loss or destruction of, or damage to, personal data.

## 9 ACCEPTANCE

- 9.1 Awarding and entering into contractual arrangements for values above £50,000 is subject to:
  - 9.1.1 Re confirmation of budgetary provision as initially identified and allocated prior to any Procurement activity.
  - 9.1.2 Confirmation of acceptable financial status of the Supplier; and

- 9.1.3 The Council's Terms and Conditions of Contract must be signed for values over £50,000 and sealed for all Contracts over £100,000 prior to the commencement of Contract. Legal input from HB Public Law should be sought on Contracts.
- 9.2 Awarding and entering contractual arrangements for values above £100,000 is subject to:
- 9.2.1 A Procurement Gateway 1, Procurement Gateway 2 or a Cabinet report approved by the relevant Procurement Board/Cabinet and the Scheme of Delegation (as per sections F3/F4 of the Financial Regulations). As required per Table 1.
- 9.2.2 The Contract being sealed by the Director of Legal & Governance Services.
- 9.3 Acceptance thresholds for Contract extensions and variations of all values are subject to further conditions as set out in Section 12 (Extensions and Variations) of these Contract Procedure Rules.

## **10 CONTRACTS SIGNING and SEALING**

- 10.1 Every Contract or Contract novation must be in a form approved by the Director of Legal and Governance Services or delegated officer if its value exceeds £50,000 or where it is appropriate to seek such approval due to the nature of the Contract.
- 10.2 Contracts with an Estimated Procurement Value greater than £100,000 must be sealed on behalf of the Council, unless the Director of Legal and Governance Services or delegated officer directs otherwise. Legal input from HB Public Law should be sought on such Contracts.

Where the Contract term is not fixed the Estimated Procurement Value is calculated by multiplying the monthly spend value by 48 in accordance with Regulation 6 of the Public Contracts Regulations 2015 .

In the case of Framework Agreements or Dynamic Purchasing Systems the Estimated Procurement Value is calculated to include the total estimated value, net of VAT, of all the individual contracts envisaged for the total term of the Framework Agreement or the Dynamic Purchasing System.

For Concession Contracts the estimated value will be the total turnover of the concessionaire generated over the duration of the contract (net of value added tax) in consideration for the works and services which are the object of the Concession Contract and the supplies incidental to such works and services.

- 10.3 Framework Agreements entered into with respect to the provision of social care to individual service users do not require sealing and need only to be signed by the respective Director or their nominated representative.

- 10.4 In the circumstances where a Court or Tribunal directs a particular placement, it must be sealed.
- 10.5 Where the Director of Legal and Governance Services or delegated officer considers it desirable that a Contract should be sealed other than as specified above, then such a Contract must be sealed.
- 10.6 All Contracts should have a clear start and end date, detail any extension options and full aggregate value of the Contract including extension period.

## 11 CONTRACT MANAGEMENT

- 11.1 Contract and Supplier Relationship Management is pivotal to the successful delivery of the Contracts that we award. A contract manager must be nominated for each eContract over £50,000 and is responsible for monitoring the performance of the Supplier and the Contract.
- 11.2 During the life of the Contract, Corporate Directors, Divisional Directors and Lead Commissioners must ensure that the Council's approved processes for contract management, as set out in the Contract Management Procedures are followed.
- 11.3 For the avoidance of doubt, officers shall not issue instructions commissioning new Services and/or variations directly to any sub-contractor of a primary contractor of the Council. All communication for variations and change of scope must be directed to the primary contractor not their sub-contractors. Day to day communication relating to delivery of their responsibilities as sub-contractors is permitted.

## 12 EXTENSIONS and VARIATIONS

- 12.1 Contracts may only be extended without having to seek further Directorate Procurement Board approval if the provisions of 12.1.1 to 12.1.4 are met:
- 12.1.1 The original Contract was awarded following a Contract Procedure Rules compliant competitive tender or Quotation process and includes an option to extend without seeking further approval.
  - 12.1.2 The extension or variation is in accordance with the terms and conditions of the existing Contract. Input from HB Public Law and the Corporate Procurement Teams should be sought to confirm this is the case and to support the drafting of the extension and/or variation documents.
  - 12.1.3 If the initial Contract was subject to the Find a Tender Services (FTS) tender procedure, that the extension option was declared within the UK Contract Notice and is contained in the Contract.
  - 12.1.4 The Contract has not been extended beyond the approved extension period.
- 12.2 In the event that the provisions of 12.1.1 to 12.1.4 are not met then a Waiver must be sought in accordance with section 13 (Waivers) or alternatively a new Procurement must commence.

12.3 Regulation 72 of the Public Contracts Regulations 2015 permits an amendment, extension or renewal of an existing Contract without triggering a new Procurement exercise in the following cases:

- a) The original Contract includes a “clear, precise and unequivocal review clause”. The overall nature of the Contract must not be altered as a result of the change.
- b) New Works, Services or Supplies need to be purchased from the Supplier and a change of Supplier cannot be realistically made for economic or technical reasons and would cause significant inconvenience or substantial duplication of the Council’s costs. This is subject to the provision that each change does not increase the Contract’s value by more than 50 per cent as a result.
- c) Circumstances have arisen that the Council could not reasonably have foreseen and that require an amendment to the existing Contract. The Contract’s overall nature must not be altered and the Contract’s value must not increase by more than 50 per cent because of any change.
- d) A new Supplier is required to replace the Supplier originally party to the Contract, either because this is the result of corporate restructuring, including takeover, merger, acquisition or insolvency leading to a universal or partial succession of the original Supplier, or because this change was envisaged in a review clause in the original Contract. This provision cannot be relied on if the Supplier is being replaced for a different reason.
- e) The value of the modification is both below the Financial Threshold and is less than 10 per cent of the initial Contract value (where the Contract is for Supplies or Services) or less than 15 per cent of the initial Contract value, in the case of a Works Contract. More than one change can be made under this provision provided the cumulative value of the modifications do not exceed the Financial Threshold.
- f) The proposed modifications are insubstantial. This does not include any modifications that result in any of the following:
  - the Contract would become materially different.
  - the scope of the Contract would extend considerably.
  - the outcome of the initial Procurement procedure would have been different had the modification been implemented at that time. For example, other tenders would have been accepted or other candidates would have been admitted.
  - the economic balance would shift in favour of the Supplier; or
  - a new Supplier would replace the original Supplier in a circumstance not provided for in d) above.

12.4 Officers must consult the Procurement team and HB Public Law to confirm if any of the circumstances set out in section 12.3 above apply, permitting a Contract amendment, extension or renewal and must also comply with the Authorisation and Acceptance Thresholds in Table 1

A Contract Variation Notice needs to be sent to Find a Tender Service in the case of Contract variations permitted and made in accordance with paragraphs b) and c) of section 12.3 above.



12.5 In the event that the provisions of 12.3 are not met then a Waiver must be sought in accordance with section 13 (Waivers) or alternatively a new Procurement must commence.

## 13 WAIVERS

- 13.1 Circumstances may arise where permission is required to waive one or more of the Contract Procedure Rules. Waivers are reserved for exceptional circumstances and will only be approved where good and sufficient reason has been demonstrated. A Waiver will not be granted simply on the grounds of convenience or because of inadequate forward planning. The Council can only waive the rules established by the Council – the Council cannot waive UK law or the Public Contracts Regulations 2015.
- 13.2 All Waivers must be approved as per Table 2: Waiver Approval Process.
- 13.3 Waivers to any of the Council's rules must be sought in advance of any contractual agreement, order placement, use of Works, Services or purchase of Supplies. Any waiver requests that are submitted in a timeframe that does not allow for an alternative route to be taken will be deemed to be non-compliant and a breach of the CPRs
- 13.4 Procurement of Social Care Spot Placements – (i.e. individual placements that fall outside of any block contracting arrangements) A general Waiver is granted so that there is no need to tender such requirements acknowledging at all times that the Council has a duty to achieve Best Value in making such placements. (Please refer to 6.8 of these CPRs)
- 13.5 Any Waiver, wherever possible, should not be more than one year in duration, unless it can be demonstrated that any longer period is in the best interest of the Council.
- 13.6 Waiver requests for the same Supplier and service after the first that results in the aggregate value of the waivers going over the £100,000 will need to follow the waiver approval process for the next band below as per table 2
- 13.7 Waiver requests for the same Supplier and service that results in the aggregate value of the waivers going over the £500,000 will need to follow the waiver approval process for the next band below as per table 2.
- 13.8 Normally the circumstances under which a Waiver can be agreed are:
- a. **Sole Supplier:** It can be proven that there is only one Supplier who can deliver the Supplies or Services. (It is considered better practice to issue a tender to evidence that there is only one Supplier.)
  - b. **Demonstrable Best Interest:** It can be demonstrated that it is in the Council's best interest and this is clearly demonstrated in the Waiver report.
  - c. **Emergency:** There is a clear need to provide a service or a product immediately in the instance of a sudden unforeseen crisis; the immediate risk is to health, life, property or environment.
  - d. **Service Imperative:** Demonstrable circumstance that is exceptional.
  - e. **Extension as a Waiver:** Where an extension to a Contract is being sought but it

is not possible under the current terms and conditions of the Contract.

#### **14. Procurement Governance: Cabinet and Member Engagement**

14.1 All Cabinet reports seeking approval to commence a procurement for the acquisition of Works, Goods or Services must be accompanied by the tender documents and a recommendation seeking approval of the tender documents.

14.2 The development of the tender documents prior to seeking approval by Cabinet must be done in close engagement and consultation with the portfolio holder for the service and any other portfolio holder that is considered to have an interest in the outcome of the tendering exercise.

14.3 Where approval is being sought from Cabinet for a programme of procurement, delegated authority may be given by Cabinet to the Corporate Director in consultation with the Director of Finance (S151 Officer) and the Portfolio Holder responsible for the programme to commence each procurement and award all contracts under the programme. All commencement and award approvals must follow the procurement gateway process.

14.4 Following Cabinet approval to commence procurement as set out above, the procurement process must commence no later than eight weeks after the approval has been granted unless otherwise approved by Cabinet.

**DEFINITIONS and INTERPRETATION**

<b>Term</b>	<b>Definition/Interpretation</b>
Acceptance	The authorisation to enter a Contract with a particular Supplier(s) on the terms, conditions and at the price(s) as set out in the Contract documents.
Approved Officer	The Corporate Director, Divisional Director, Service Lead or Lead Commissioner Officer who has responsibility for all Contracts tendered and let by their Directorate including Contract monitoring and management once the Contract is in place.
Authorisation	The approval required to enable any Procurement to commence or any Contract to be awarded.
Best Value	The duty on local authorities to secure continuous improvement in the way in which functions are exercised, having regard to a combination of economy, efficiency and effectiveness as implemented by the Council.
Budget	All the financial resources allocated to different services and projects.
Cabinet	The Councillors who, together with the leader, form the executive
Cabinet Report	A report that is required to be submitted to Cabinet.
Chief Executive	The most senior officer, with overall responsibility for the management and operation of the Council.
Head of Procurement and Procurement Business Partner	The officer in the Corporate Procurement Team that has responsibility to provide expert support and guidance to the Council.
Commercial and Procurement Strategy	The Council's Commercial and Procurement Strategy available <a href="#">Here</a>
Corporate Procurement Team	The team that provides expert Procurement support to the Council.

Term	Definition/Interpretation
Commercial Strategy	The document that sets out the commercial and procurement priorities of the Council.
Competitive Tendering	Awarding of Contracts by the process of inviting competing tenders.
Concession Contract	a services concession contract or a works concession contract as defined in The Concession Contracts Regulations 2016. They are contracts for pecuniary interest which consist either solely in the right to exploit the services or works that are the subject of the contract or in that right together with payment.
Constitution	The document setting out how the Council operates, how decisions are made and all the procedures that have to be followed.
Contract	A formal written agreement, which is enforceable by law between the Council and the provider of any Supplies, Services or Works.
Contract Management Procedures	The Council's Contract management procedures which can be found <a href="#">Here</a>
Contract Procedure Rules (CPRs)	The rules required in accordance with section 135 of the Local Government Act 1972.
Contracts Finder	means a web-based portal provided by or on behalf of the Cabinet Office for the publication of information about contracts awarded.  <a href="#">Contract Finder</a>
Contracts Register	Record of Council Contracts maintained by the Head of Procurement.
Corporate Director	The officer in charge of a Council Directorate.
Director of Finance	Also known as the "Section 151 Officer". The Officer responsible for the administration of the financial affairs of the Council.

Term	Definition/Interpretation
Directorate Procurement Board	The group of officers who meet regularly in each Directorate to consider procurement business within their directorates and consider all procurement gateway reports (£100,000 to £499,999) and Cabinet Reports for procurements over £500,000 and all Key Decisions.
Due Diligence	<p>A process of acquiring objective and reliable information, generally on a person or a company, prior to making any decisions.</p> <p>A systematic research effort, which is used to gather the critical facts and descriptive information which are most relevant to the making of an informed decision on a matter of importance.</p>
Dynamic Purchasing System	is appropriate for commonly used purchases the characteristics of which, as generally available on the market, meet the Council's requirements. The rules for using it are set out in regulation 34 of the Public Contracts Regulations 2015.
Electronic Procurement Portal	The Council's electronic system for conducting procurement activity.
Estimated Procurement Value	The value of a procurement based on the total amount payable, net of VAT, as estimated by the Council, including any form of option and any renewals of the Contracts as explicitly set out in the procurement documents

Term	Definition/Interpretation
Evaluation Criteria	<p>The publishing of detailed objectively quantifiable award criteria and sub criteria linked to the subject matter of the contract together with their weighting (or ranking where weighting is not possible for demonstrable reasons) and the method by which you will evaluate them in the contract documents. They may include but are not limited to:</p> <p>(a) quality, including technical merit, aesthetic and functional characteristics, accessibility, design for all users, social, environmental and innovative characteristics and trading and its conditions.</p> <p>(b) organizations, qualification and experience of staff assigned to performing the contract, where the quality of the staff assigned can have a significant impact on the level of performance of the contract; or</p> <p>(c) after-sales service and technical assistance, delivery conditions such as delivery date, delivery process and delivery period or period of completion.</p>
Executive	The Leader and the Cabinet; responsible for carrying out almost all the council's functions.
Financial Threshold	<p>The Financial Threshold above which the Public Contracts Regulations must be applied.</p> <p>The UK reviews this financial threshold bi-annually. From 1st January 2022 the value is:</p> <p>£213,447 (Inc VAT) Supplies and Services  £663,540(Inc VAT) Light Touch Services  £5,336,937 (Inc VAT) Works and Concessions</p>
Forward Plan	A schedule of the Key Decisions the Executive expects to take over the next 4 months.
Framework Agreement	An agreement between one or more contracting authorities and one or more economic operators, the purpose of which is to establish the terms governing contracts to be awarded during a given period, in particular with regard to price and, where appropriate, the quantity envisaged.

Financial Regulations	The Financial Regulations as approved by the full Council and set out in the constitution.
Frequently Asked Questions	Answers and further guidance developed by the procurement team to the most asked questions related to the procurement process. The FAQ document is <a href="#">here</a>
HB Public Law	The legal team within the council.
Invitation to Tender Documents	The documents inviting Suppliers to tender, including the Terms and Conditions of Contract; Service Specification; Method Statement Questions; Pricing Document; Information to Tenderers including clear Evaluation Criteria and sub criteria.
Life-Cycle Costing	Covers part or all the following costs over the life cycle of a product, service or works: (a) costs, borne by the Council or other users, such as: (i) costs relating to acquisition, (ii) costs of use, such as consumption of energy and other resources, (iii) maintenance costs, and (iv) end of life costs, such as collection and recycling costs. (b) costs imputed to environmental externalities linked to the product, service or works during its life cycle, provided their monetary value can be determined and verified. These costs may include the cost of emissions of greenhouse gases and of other pollutant emissions and other climate change mitigation costs
Light Touch Regime Services	The rules and procedures for procuring Social and other Specific Services. Those procedures must ensure compliance with the principles of transparency and equal treatment of Suppliers, publication of a Contract Notice and a Contract Award Notice.
Local Business	Organisations (private, voluntary and or community led) within Harrow borough boundary who can provide works, goods and services to the Council.

Term	Definition/Interpretation
Key Decision	<p>A decision by the Executive which is likely to:</p> <p>(i) result in the Council incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decision relates; or</p> <p>(ii) be significant in terms of its effects on communities living or working in an area of two or more wards of the Borough.</p> <p>(iii) A decision is significant for the purposes of (i) above if it involves expenditure or the making of savings of an amount in excess of £1m for capital expenditure or £500,000 for revenue expenditure or, where expenditure or savings are less than the amounts specified above, they constitute more than 50% of the budget attributable to the service in question.</p>
Members	The elected representatives of the Council.
Most Economically Advantageous Tender (MEAT)	<p>Assessment of the tenders received using a variety of objective and non-discriminatory criteria linked to the subject matter of the contract to identify the tender which is best value for money.</p> <p>You cannot use the criteria for any purpose other than identifying the most economically advantageous tender from the point of view of the procurer. It allows you to assess a number of factors including the technical aspects, social value, sustainability and price of a tender and to rank the tenders in the competition.</p>
Portfolio Holder	The Member of Cabinet responsible for ensuring the effective management and delivery of Executive functions. Each Portfolio Holder has specific areas of responsibility.



Term	Definition
Selection Questionnaire	The questionnaire usually sent to Supplier who express an interest in tendering for a Contract which seeks details and information about their technical, financial and organisational ability to perform the Contract
Procurement	<p>The acquisition by means of a public contract of works, supplies or services by one or more public bodies from Suppliers chosen by those public bodies, whether or not the Works, Supplies or Services are intended for a public purpose.</p> <p>This includes any activity which includes the identification of need, options appraisal and the execution of a competitive selection process, Quotation or tendering process, commercial activities and entering into Contracts.</p>
Procurement Card	A Corporate Purchasing Card for the purchase of low value supplies, works or services. To be used in compliance with the Procurement Card Policy
Procurement Gateway 1	The report required to be written and presented to the respective procurement board and approved prior to commencing any procurement or tendering activity.
Procurement Gateway 2	The report required to be written and presented to the respective procurement board and then signed off by the scheme of delegation to seek authority to award a contract, extend a contract or seek a waiver to these CPRs.
Procurement Plan	compiled by the Procurement Team setting out planned annual procurement pipelines across each directorate.
Public Contracts Regulations 2015	The main body of law that regulates the purchasing by Public Sector Bodies and certain utility sector bodies of contracts for goods, works or services. In England these are the Public Contracts Regulations 2015
Public Sector Bodies	Including, but not limited to the West London Alliance, London Councils, ESPO, YPO, Crown Commercial Services, the EFA, Greater London Authority and Transport for London

<b>Term</b>	<b>Definition/Interpretation</b>
Purchase Order	The mandatory order created within the D365 System for Goods, Works or Services.
Quotation	A priced bid for the provision of supplies, a service, or supply of works
Scheme of Delegation	A formal document recording the agreed handing down of statutory (where allowed) and other responsibilities by the Council to the Cabinet, Cabinet Members, Committees, Panels and Officers.
Services	Means the services to be provided as detailed in the Specification and shall, where the context so admits, include any materials, articles or supplies to be supplied there under.
Service Specification	The document usually attached as a schedule to the terms and conditions of Contract specifying in detail the Council's precise requirements relating to the purchase of Supplies, Services or Works.
Social and other Specific Services	Those social and other specific services set out at Schedule 3 of the Public Contracts Regulations 2015 to be awarded in accordance with Section 7 of the Public Contracts Regulations 2015
Social Care Spot Placement	Individual placements that fall outside of any block contracting arrangements
Standstill Period	<p>The standstill period is a 10 day pause between contract award decision and the formal award of the Contract. The standstill is a legal requirement which the Council must comply with. It applies to all procurements covered by the full scope of the Financial Thresholds.</p> <p>The period allows unsuccessful bidders to obtain more information on the award of the contract. Unsuccessful bidders can take appropriate action if they believe they have been treated unfairly. The period is also known as the 'Alcatel Period'. Alcatel was the name of the European case which brought about the change in the law.</p>

Term	Definition/Interpretation
Suitability Assessment Question	means a question which relates to information or evidence which the Council requires for the purpose of assessing whether candidates meet requirements or minimum standards of suitability, capability, legal status or financial standing
Supplies	Means the supplies to be provided as detailed in the specification.
Supplier	A Supplier or potential Supplier of Works, Supplies or Services to the Council.
Terms and Conditions of Contract	A document approved by HB Public Law that sets out the relationship between the Council and a third party.
Transparency Code	The Local Government Transparency Code setting out the minimum data that local authorities should be publishing, the frequency it should be published and how.
TUPE (Transfer of Undertakings (Protection of Employment) Regulations 2006 (SI 2006 No.246)) as amended from time to time.	Subject to certain conditions, these regulations apply where responsibility for the delivery of works or services for the authority is transferred from one organisation (e.g. private contractor, local authority in-house team) to another (e.g. following a contracting out or competitive tendering process) and where the individuals involved in carrying out the work are transferred to the new employer. These regulations seek to protect the rights of employees in such transfers, enabling them to enjoy the same terms and conditions, with continuity of employment, as existed with their former employer.
UK Notice	Notice posted on the Find a Tender Service (FTS). This includes a Prior Information Notice (PIN), a Contract Notice or a Contract Award Notice.
Value for Money	the optimum combination of Life Cycle Costing and quality (or fitness for purpose) to meet the Council's requirements
Waiver	An exception from the strict compliance with Contract Procedure Rules granted in accordance with the relevant section within these CPRs (section 13)
Works	Means the work or works to be provided as detailed in the service specification, including building, engineering and capital works

There are number of valuable links in the above Contract Procedure Rules document, if any of them fail to open please try to generic link to the procurement Intranet Page:

Procurement (sharepoint.com)

#### **Harrow Council Procurement Pipeline (April 2023 - March 2024)**

This Procurement Pipeline contains details of contracts expected to be re-procured and new procurement projects that are expected to be undertaken by Harrow Council with a value greater than £100k.

Please be aware that there is no guarantee that any published pipeline project will lead to a tender publication as we may opt to make use of a compliant framework agreement, exercise an extension option in the contract or decide not to proceed with the procurement altogether.

This information reflects our anticipated procurement pipeline for the next financial year, and is subject to change. If you have a query regarding any of the projects listed in this document, please contact [Procurement@harrow.gov.uk](mailto:Procurement@harrow.gov.uk)

Appendix 2: Harrow Council Procurement Pipeline April 2023 - March 2024

Directorate	Division - Spend Category	Contract Title/ Description	Initial current contract start date	Initial or current contract end date	Extension options included in contract	Final extension option expiry date	Value of the current contract / Estimated contract value
Peoples	Public Health	Health Visiting and School Nursing 0-19 Service	01/07/18	30/06/23	Yes	30/06/25	£ 26,371,000
Peoples	Adult Social Care	LD and ASD Supported Accommodation	N/A	N/A	N/A	N/A	TBC
Peoples	Childrens & Families	Supported Living Services for Care Leavers	01/04/18	31/03/21	Yes	31/03/24	£ 1,200,000
Peoples	Adult Social Care	Mental Health Community Provision (formerly The Bridge - Hul)	01/10/21	31/03/24	No	N/A	£ 294,833
Peoples	Childrens & Families	Provision of the supply of adoption services (RAA)	31/05/19	30/05/24	Yes	30/05/29	£ 4,796,220
Peoples	Adult Social Care	Mental Health Supported Accommodation Services	01/09/21	31/08/23	Yes	31/08/25	£ 699,496
Peoples	Adult Social Care	Framework for Mental Health Pathway	N/A	N/A	N/A	N/A	TBC
Peoples	Childrens & Families	Short Breaks Framework	01/09/22	31/08/23	Yes	31/08/24	TBC
Peoples	Adult Social Care	Domiliary Care (Homecare)	TBC	TBC	TBC	TBC	£ 17,000,000
Place	Economy & Culture	Leisure Management Services	01/09/13	31/08/24	No	N/A	£ 5,812,000
Place	Environmental Services	Concession Contract for the Purchase and Collection of Metal	01/07/20	30/06/23	Yes	30/06/25	£ 325,000
Place	Environmental Services	Planned and Preventative Maintenance and Compliance	N/A	N/A	N/A	N/A	£ 9,000,000
Place	Environmental Services	Fencing instalation, maintenance, security and ground works	26/11/21	31/03/23	No	N/A	£ 200,000
Place	Housing	Architect Constultancy Services	N/A	N/A	N/A	N/A	£ 150,000
Place	Environmental Services	Supply, servicing and maintenance of pay and display machines	01/04/22	31/03/23	No	N/A	£ 100,000
Place	Housing	Beatty Road external and communal repairs and decorations	N/A	N/A	N/A	N/A	£ 750,000
Place	Housing	Door entry systems at various properties	N/A	N/A	N/A	N/A	£ 450,000
Place	Environmental Services	Specialist Nursing	N/A	N/A	N/A	N/A	£ 1,000,000
Place	Environmental Services	IWMS Integration Workplan Management System	N/A	N/A	N/A	N/A	£ 200,000
Place	Housing	Decarbonisation - NET ZERO   Retrofit - SHDH Wave	N/A	N/A	N/A	N/A	£ 1,000,000
Place	Climate Change	Solar Panel Installation	N/A	N/A	N/A	N/A	£ 1,000,000
Place	Economy & Culture	HAC New Build	7/23/2022	3/23/2023	N/A	N/A	£ 1,000,000
Place	Economy & Culture	UKSPF	12/22/2022	3/25/2023	N/A	N/A	£ 2,100,000
Place	Economy & Culture	Learn Harrow 2023.24 Academic Year	2/23/2022	7/24/2023	N/A	N/A	TBC
Place	Regeneration & Planning	Hutton Lane	N/A	N/A	N/A	N/A	£ 1,400,000
Place	Regeneration & Planning	Shaftesbury Circle	N/A	N/A	N/A	N/A	£ 1,400,000
Place	Regeneration & Planning	Augustine Road (13 units)	N/A	N/A	N/A	N/A	£ 4,225,000
Place	Housing	Housing Related Support and Preventative Services Floating Su	TBC	TBC	N/A	N/A	£ 1,000,000
Place	Housing	Housing repairs - Specialist Legal / Structural works	TBC	TBC	N/A	N/A	£ 1,000,000
Place	Housing	non HRA properties - repairs and maintenance	TBC	TBC	N/A	N/A	£ 1,000,000
Place	Housing	Architect Consultancy	10/12/20	09/12/23	No	N/A	£ 163,000
Place	Environmental Services	Arboricultural Works	01/03/19	28/02/22	Yes	28/02/24	£ 2,137,735
Place	Environmental Services	Wireless concessions	03/02/14	02/02/24	No	N/A	Income generation
Place	Environmental Services	Cashless Parking	01/03/19	28/02/24	Yes	28/02/29	Income generation
Place	Housing	Rough Sleeping Accommodation Programme	10/01/22	01/04/24	No	N/A	£ 279,988
Place	Environmental Services	Provision of Parking & Traffic Surveys 2021	01/05/21	30/04/24	Yes	30/04/26	£ 288,207
Place	Environmental Services	Planning and Public Protection Solution	01/05/21	30/04/24	Yes	30/04/26	£ 617,247
Place	Environmental Services	Flood Management	01/11/19	31/03/24	No	N/A	£ 499,500
Place	Housing	Housing Repairs and Maintenance	01/07/16	01/07/21	Yes	30/06/2024	£ 40,000,000
Place	Housing Regen	Grange Farm - Phases 2 & 3 - Employer's Agent Services	N/A	N/A	N/A	N/A	N/A
Place	Environmental Services	Catering Supplies	N/A	N/A	TBC	TBC	£ 100,000
Place	Regeneration & Planning	After Care Contract	N/A	N/A	TBC	TBC	£ 320,000
Place	Housing Regen	Grange Farm - CHP ESCO Provider	N/A	N/A	TBC	TBC	£ 5,000,000
Place	Regeneration & Planning	Grove Avenue Pinner Grove	N/A	N/A	TBC	TBC	£ 7,600,000
Place	Regeneration & Planning	Martin Drive	N/A	N/A	TBC	TBC	£ 2,450,000
Place	Regeneration & Planning	Temple Decant	N/A	N/A	TBC	TBC	TBC
Place	Regeneration & Planning	Legal support to HSDP	N/A	N/A	TBC	TBC	£ 150,000
Place	Housing	Park Gates   Tregenna   Arundel Roofs replacement, Roofline,	N/A	N/A	N/A	N/A	£ 822,984
Place	Housing	Mountside structural, roof & windows	N/A	N/A	N/A	N/A	£ 503,807
Place	Housing	Facilities Management Services	17/02/22	17/10/22	No	N/A	£ 150,000
Place	Housing	Furnishing Services	14/03/22	13/11/22	No	N/A	£ 150,000
Place	Housing	Beatty Road external and communal repairs and decorations	N/A	N/A	N/A	N/A	tbc
Place	Housing	Enveloping - Stone grove Gardens - pathways, walkway, bins	N/A	TBC	N/A	N/A	£ 896,000
Resources	ICT	02 Landline	30/11/20	29/11/23	Yes	30/11/25	£ 314,612
Resources	Finance	Insurance Litigation Services	01/08/18	31/07/23	No	N/A	£ 3,275,000
Resources	ICT	Mobile Voice & Data Services	17/09/20	16/09/23	No	N/A	£ 478,800
Resources	ICT	Unified Communications	30/05/20	29/05/23	Yes	29/05/24	£ 1,091,618
Resources	Legal Services	Legal Library / Knowledge Management Services- online / text	01/12/19	30/11/22	No	N/A	£ 353,054
Resources	ICT	Supply of laptops	07/02/22	06/02/23	No	N/A	£ 169,000
Resources	Finance	Public Sector Purchasing Card Agreement	11/02/15	30/11/21	Yes	30/11/23	£ 200,000
Resources	Finance	Actuarial Services	10/04/12	30/09/23	No	N/A	£ 387,000
Resources	ICT	Digital360 Service	25/09/20	31/10/23	Yes	31/10/25	£ 1,085,171
Resources	ICT	ITSM Toolset	17/02/20	16/02/23	Yes	16/02/24	£ 424,461
Resources	Human Resources	Provision of Temporary Recruitment Services and Permanent R	06/02/21	05/02/24	Yes	05/02/25	£ 93,300,000
Resources	Finance	Revs & Bens software license and web services charges	01/04/21	31/03/24	No	N/A	£ 456,736
Resources	Finance	Business Improvement District	01/04/19	31/03/24	no	N/A	£ 1,875,000
Resources	Finance	Revenues & Benefits Resilience Support	01/03/19	31/03/24	no	31/03/25	£ 3,463,000
Resources	Finance	Revenues & Benefits Software	01/04/21	31/03/24	No	N/A	£ 456,736
Resources	Finance	Document Storage	20/09/20	19/09/24	No	N/A	£ 200,000
Resources	Finance	Postal Services	14/09/21	13/09/24	yes	12/09/26	£ 350,000
Resources	ICT	Provision of multifunctional devices and services, managed pri	27/12/19	26/12/24	No	N/A	£ 594,999
Resources	ICT	Learning & Development Portal	30/09/22	30/09/24	Yes	30/09/26	£ 161,100
Resources	Strategy & Partnerships	General Information and Advice Service	01/08/22	31/07/23	Yes	31/07/24	£ 432,000
Resources	Strategy & Partnerships	Third Sector Support	01/10/17	30/09/20	Yes	30/09/23	£ 300,000
<b>Total</b>							<b>£ 255,070,303</b>
<b>Number of Projects</b>							<b>74</b>

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Harrow Council Procurement Pipeline April 2023 - March 2024

Directorate	Division - Spend Category	Contract Title/ Description	Initial current contract start date	Initial or current contract end date	Extension options included in contract	Final extension option expiry date	Value of the current contract / Estimated contract value
Peoples	Public Health	Health Visiting and School Nursing 0-19 Service	01/07/18	30/06/23	Yes	30/06/25	£ 26,371,000
Peoples	Adult Social Care	LD and ASD Supported Accommodation	N/A	N/A	N/A	N/A	TBC
Peoples	Childrens & Families	Supported Living Services for Care Leavers	01/04/18	31/03/21	Yes	31/03/24	£ 1,200,000
Peoples	Adult Social Care	Mental Health Community Provision (formerly The Bridge - Hub	01/10/21	31/03/24	No	N/A	£ 294,833
Peoples	Childrens & Families	Provision of the supply of adoption services (RAA)	31/05/19	30/05/24	Yes	30/05/29	£ 4,796,220
Peoples	Adult Social Care	Mental Health Supported Accommodation Services	01/09/21	31/08/23	Yes	31/08/25	£ 699,496
Peoples	Adult Social Care	Framework for Mental Health Pathway	N/A	N/A	N/A	N/A	TBC
Peoples	Childrens & Families	Short Breaks Framework	01/09/22	31/08/23	Yes	31/08/24	TBC
Peoples	Adult Social Care	Domcillary Care (Homecare)	TBC	TBC	TBC	TBC	£ 17,000,000
<b>Total</b>							<b>£ 50,361,549.33</b>
<b>Number of Projects</b>							<b>9</b>

Harrow Council Procurement Pipeline April 2023 - March 2024

Directorate	Division - Spend Category	Contract Title/ Description	Initial current contract start date	Initial or current contract end date	Extension options included in contract	Final extension option expiry date	Value of the current contract / Estimated contract value
Place	Economy & Culture	Leisure Management Services	01/09/13	31/08/24	No	N/A	£ 5,812,000
Place	Environmental Services	Concession Contract for the Purchase and Collection of Metal &	01/07/20	30/06/23	Yes	30/06/25	£ 325,000
Place	Environmental Services	Planned and Preventative Maintenance and Compliance	N/A	N/A	N/A	N/A	£ 9,000,000
Place	Environmental Services	Fencing instalation, maintenance, security and ground works	26/11/21	31/03/23	No	N/A	£ 200,000
Place	Housing	Architect Constultancy Services	N/A	N/A	N/A	N/A	£ 150,000
Place	Environmental Services	Supply, servicing and maintenance of pay and display machines	01/04/22	31/03/23	No	N/A	£ 100,000
Place	Housing	Beatty Road external and communal repairs and decorations	N/A	N/A	N/A	N/A	£ 750,000
Place	Housing	Door entry systems at various properties	N/A	N/A	N/A	N/A	£ 450,000
Place	Environmental Services	Specialist Nursing	N/A	N/A	N/A	N/A	£ 1,000,000
Place	Environmental Services	IWMS Integration Workplan Management System	N/A	N/A	N/A	N/A	£ 200,000
Place	Housing	Decarbonisation - NET ZERO   Retrofit - SHDH Wave	N/A	N/A	N/A	N/A	£ 1,000,000
Place	Climate Change	Solar Panel Instalation	N/A	N/A	N/A	N/A	£ 1,000,000
Place	Economy & Culture	HACNew Build	7/22/2022	3/23/2023	N/A	N/A	£ 1,000,000
Place	Economy & Culture	UKSPF	12/22/2022	3/25/2023	N/A	N/A	£ 2,100,000
Place	Economy & Culture	Learn Harrow 2023.24 Academic Year	2/23/2022	7/24/2023	N/A	N/A	TBC
Place	Regeneration & Planning	Hutton Lane	N/A	N/A	N/A	N/A	£ 1,400,000
Place	Regeneration & Planning	Shaftesbury Circle	N/A	N/A	N/A	N/A	£ 1,400,000
Place	Regeneration & Planning	Augustine Road (13 units)	N/A	N/A	N/A	N/A	£ 4,225,000
Place	Housing	Housing Related Support and Preventative Services Floating Sup	TBC	TBC	N/A	N/A	£ 1,000,000
Place	Housing	Housing repairs - Specialist Legal / Structural works	TBC	TBC	N/A	N/A	£ 1,000,000
Place	Housing	non HRA properties - repairs and maintenance	TBC	TBC	N/A	N/A	£ 1,000,000
Place	Housing	Architect Consultancy	10/12/20	09/12/23	No	N/A	£ 163,000
Place	Environmental Services	Arboricultural Works	01/03/19	28/02/22	Yes	28/02/24	£ 2,137,735
Place	Environmental Services	Wireless concessions	03/02/14	02/02/24	No	N/A	Income generation
Place	Environmental Services	Cashless Parking	01/03/19	28/02/24	Yes	28/02/29	Income generation
Place	Housing	Rough Sleeping Accommodation Programme	10/01/22	01/04/24	No	N/A	£ 279,988
Place	Environmental Services	Provision of Parking & Traffic Surveys 2021	01/05/21	30/04/24	Yes	30/04/26	£ 288,207
Place	Environmental Services	Planning and Public Protection Solution	01/05/21	30/04/24	Yes	30/04/26	£ 617,247
Place	Environmental Services	Flood Management	01/11/19	31/03/24	No	N/A	£ 499,500
Place	Housing	Housing Repairs and Maintenance	01/07/16	01/07/21	Yes	30/06/2024	£ 40,000,000
Place	Housing Regen	Grange Farm - Phases 2 & 3 - Employer's Agent Services	N/A	N/A	N/A	N/A	N/A
Place	Environmental Services	Catering Supplies	N/A	N/A	TBC	TBC	£ 100,000
Place	Regeneration & Planning	After Care Contract	N/A	N/A	TBC	TBC	£ 320,000
Place	Housing Regen	Grange Farm - CHP ESCO Provider	N/A	N/A	TBC	TBC	£ 5,000,000
Place	Regeneration & Planning	Grove Avenue Pinner Grove	N/A	N/A	TBC	TBC	£ 7,600,000
Place	Regeneration & Planning	Martin Drive	N/A	N/A	TBC	TBC	£ 2,450,000
Place	Regeneration & Planning	Temple Decant	N/A	N/A	TBC	TBC	TBC
Place	Regeneration & Planning	Legal support to HSDP	N/A	N/A	TBC	TBC	£ 150,000
Place	Housing	Park Gates   Tregenna   Arundel Roofs replacement, Roofline, R	N/A	N/A	N/A	N/A	£ 822,984
Place	Housing	Mountside structural, roof & windows	N/A	N/A	N/A	N/A	£ 503,807
Place	Housing	Facilities Management Services	17/02/22	17/10/22	No	N/A	£ 150,000
Place	Housing	Furnishing Services	14/03/22	13/11/22	No	N/A	£ 150,000
Place	Housing	Beatty Road external and communal repairs and decorations	N/A	N/A	N/A	N/A	tbc
Place	Housing	Enveloping - Stone grove Gardens – pathways, walkway, bin she	TBC	TBC	N/A	N/A	£ 896,000
<b>Total</b>							<b>£ 95,240,468</b>
<b>Number of Projects</b>							<b>44</b>



Harrow Council Procurement Pipeline April 2023 - March 2024

Directorate	Division - Spend Category	Contract Title/ Description	Initial current contract start date	Initial or current contract end date	Extension options included in contract	Final extension option expiry date	Value of the current contract / Estimated contract value
Resources	ICT	Q2 Landline	30/11/20	29/11/23	Yes	30/11/25	£ 314,612
Resources	Finance	Insurance Litigation Services	01/08/18	31/07/23	No	N/A	£ 3,375,000
Resources	ICT	Mobile Voice & Data Services	17/09/20	16/09/23	No	N/A	£ 478,800
Resources	ICT	Unified Communications	30/05/20	29/05/23	Yes	29/05/24	£ 1,091,618
Resources	Legal Services	Legal Library / Knowledge Management Services- online / text	01/12/19	30/11/22	No	N/A	£ 353,054
Resources	ICT	Supply of laptops	07/02/22	06/02/23	No	N/A	£ 169,000
Resources	Finance	Public Sector Purchasing Card Agreement	11/02/15	30/11/21	Yes	30/11/23	£ 200,000
Resources	Finance	Actuarial Services	10/04/12	30/09/23	No	N/A	£ 387,000
Resources	ICT	Digital360 Service	25/09/20	31/10/23	Yes	31/10/25	£ 1,085,171
Resources	ICT	ITSM Toolset	17/02/20	16/02/23	Yes	16/02/24	£ 424,461
Resources	Human Resources	Provision of Temporary Recruitment Services and Permanent R	06/02/21	05/02/24	Yes	05/02/25	£ 93,300,000
Resources	Finance	Revs & Bens software license and web services charges	01/04/21	31/03/24	No	N/A	£ 456,736
Resources	Finance	Business Improvement District	01/04/19	31/03/24	no	N/A	£ 1,875,000
Resources	Finance	Revenues & Benefits Resilience Support	01/01/19	31/03/24	no	31/03/25	£ 3,463,000
Resources	Finance	Revenues & Benefits Software	01/04/21	31/03/24	No	N/A	£ 456,736
Resources	Finance	Document Storage	20/09/20	19/09/24	No	N/A	£ 200,000
Resources	Finance	Postal Services	14/09/21	13/09/24	yes	12/09/26	£ 350,000
Resources	ICT	Provision of multifunctional devices and services, managed prin	27/12/19	26/12/24	No	N/A	£ 594,999
Resources	ICT	Learning & Development Portal	30/09/22	30/09/24	Yes	30/09/26	£ 161,100
Resources	Strategy & Partnerships	General Information and Advice Service	01/08/22	31/07/23	Yes	31/07/24	£ 432,000
Resources	Strategy & Partnerships	Third Sector Support	01/10/17	30/09/20	Yes	30/09/23	£ 300,000
<b>Total</b>							<b>£ 109,468,286</b>
<b>Number of Projects</b>							<b>21</b>

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Appendix 3: Contracts Awarded between January 2022 & December 2022.

Main Contractor	Title (*)	Start Date	Initial contract End Date	Extension available Yes/No	Extension end date	Annual Value	Total Value of Contract/ Framework	Department
Avison Young (UK) Ltd	Commercial and Financial Advisor HSDP	03/01/22	03/01/24	Yes	03/01/2026	£69,000	£276,000	Place - Regeneration & Planning
Senator	Depot Fit Out	04/01/22	04/01/23	No		£692,482	£692,482	Place - Regeneration & Planning
Community Connex DARE KIDS Kids Can Achieve	Short breaks for disabled children - Framework	09/01/22	31/08/2023	Yes	31/08/2024	£370,000	£370,000	Peoples - C&F
Each Counselling and Support	Rough Sleeping Accommodation Programme	10/01/22	31/03/24	No		£124,039	£279,988	Place - Housing
Milestone Contracting Limited	Renewal of Roofs - Residential Street Dwellings	11/01/22	31/05/22	no	n/a	£358,084	£358,084	Place - Housing
Harrow Together	Harrow Community Champion Programme	11/01/22	30/04/24	no	n/a	£300,000	£300,000	Peoples - C&F
NR Limited (trading as Cornerstone Personnel)	Managed Service for Special Needs Transport & Associated Services	25/01/22	03/04/26	Yes		£4,900,000	£34,972,510	Place - Communities
HLM Architects	Harrow New Civic Design Advisor	31/01/22	01/02/24	Yes	01/02/2026	£36,960	£147,840	Place - Communities
Wybone Ltd	Food Waste Bin Housings	01/02/22	30/01/23	NO		£275,000	£275,000	Place - Communities
TechnoWorld	Supply of laptops	07/02/22	06/02/23	No		£169,000	£171,913	Resources & Commercial
Bytes Software Services Ltd	IT Consultancy and Support	14/02/22	31/10/22	No	No	£479,705	£479,705	Resources & Commercial
Ridge & Partners LLP	Employer's Agent for the Housing In-Fill Programme Lot 1	21/03/22	20/03/25	Yes	20/03/2026	£150,000	£504,700	Place - Housing
Airey Miller Ltd	Employer's Agent for the Housing In-Fill Programme Lot 2	21/03/22	20/03/25	Yes	20/03/2026	£150,000	£691,323	Place - Housing
Family Action	Harrow SEND Information Advice Service (SENDIAS)	01/04/22	31/03/25	Yes	30/03/2027	£87,292	£436,981	Peoples - C&F
Compass - Services to Improve Health and Wellbeing	Harrow Young People's Substance Misuse Service	01/04/22	31/03/25	No		£239,000	£716,894	People - Public Health
Zurich Municipal	Liability Insurance	01/04/22	31/03/25	yes	31/03/2027		£1,153,190	Resources & Commercial
Protector (AON will invoice on behalf)	Property Insurance	01/04/22	31/03/25	yes	31/03/2027		£655,585	Resources & Commercial
Accenture	SAP Payroll Contingency for D365	01/04/22	31/12/22	No		£300,000	£300,000	Resources & Commercial
New Era Fuel	Bulk Fuel Supply	01/04/22	31/03/24	No		£150,000	£150,000	Place - Communities
Dotted Eyes / Miso	FME Software	01/04/22	31/03/26	No		£41,000	£164,000	Resources & Commercial
Young Harrow Foundation	Young Harrow Foundation (YHF) to coordinate the delivery and evaluation of the DfE funded Holiday Activities and Food Programme and other grant funded activities on behalf of the Council and partners	01/04/22	31/03/25			£213,477	£213,477	Peoples - C&F
J B Riney & Co Ltd	Bannister Sports Centre - Overflow Car Park	04/04/22	03/03/23	No	No	£244,205	£244,205	Place - Economy & Culture
Bouygues E&S Solutions Ltd	Decarbonisation Works	20/04/22	31/12/22	No		£543,493	£615,510	Place - Climate Change & Natural Resources
Network Rail Infrastructure Ltd	Kodak Footbridge - Wealdstone	22/04/22	22/04/23	No		£339,885	£339,885	Place - Communities
Anglian Water Business (National) Limited Trading as Wave	Water Supply Contract	01/05/22	30/04/24	Yes	30/04/2026	£471,500	£1,886,000	Place - Climate Change & Natural Resources
Wex Europe Services Ltd	Fuel Cards Services	01/05/22	30/04/27	Yes	30/04/2029	£897,325	£6,281,278	Place - Communities
Charzy Ltd	Residential Charge Points	01/05/22	30/04/27	No	No	£109,000	£109,000	Place - Communities
The Romanian and Eastern European Hub	Homes for Ukraine - Refugee Support	01/05/22	31/03/23	No	No	£177,000	£177,000	Resources
Harcross Specialist Contractors Ltd	237 Long Elms Fire Reinstatement Works	25/05/22	25/08/22	No	No	£163,635	£163,635	Place - Housing
DSSL Group Ltd	CCTV Infrastructure Upgrade and Maintenance	14/06/22	13/06/27	yes	13/06/2032	Year 1 Capital £1,087,599.13 Annual Support & Maintenance (Years 1-10) £784,500.00	£1,872,099	Place - Communities
Symology Ltd	Highways Asset Management Community Engagement Software	21/06/22	20/06/24	Yes	20/06/2026	£93,953	£375,812	Place - Communities
Phoenix Software Ltd	Microsoft Enterprise Agreement and Azure Cloud Agreement	01/07/22	30/06/25	No		£1,044,068	£3,957,247	Resources & Commercial
Freeway Lift Services Ltd	Lift Services - Specialist Equipment	13/07/22	12/07/23	No		£200,000	£200,000	Place - Housing
Metropolitan Housing Trust	Extra Care Provision - Ewart House	25/07/22	24/07/27	Yes	24/07/2029	£926,724	£4,747,751	People - Adults
Borras Construction Limited	Fit out works at Sheldon House, Gayton Road	28/07/22	27/11/23	No			£662,287	Place - Communities
Public-i Group Limited	Hybrid Streaming Solution	29/07/22	28/07/27	No		£3,920	£149,659	Resources & Commercial
Harrow Citizens Advice Bureau Ltd	General Information and Advice Service	01/08/22	31/07/23	Yes	31/07/2024	£216,000	£432,000	Resources & Commercial
Gateville Group	Pinner Grove Communal Flooring Renewal	01/08/22	21/10/22	No	No	£100,123	£100,123	Place - Housing
Abavus Limited	Supply and Support of Council Services Digital Transformation Platform	01/08/22	31/07/24	yes	31/07/2026	£35,414	£141,654	Place - Communities
Compass Minerals UK Ltd	Supply of de-icing Brown Rock Salt	03/08/22	31/07/26	No	No	£120,500	£482,000	Place - Communities
Lift Maintenance	Lift & Engineering Services Ltd	12/08/22	11/08/27	No		£60,000	£300,000	Place - Communities
Medigold Health Consultancy Limited	Occupational Health & Employee Assistance Programme Contract	01/09/22	31/08/25	No	n/a	£90,000	£270,000	Resources - HR
W G Wigginton Limited	Security and Compliance - Homesafe 3	14/09/22	14/09/24	Yes	14/09/2026	£1,013,480	£4,053,920	Place - Housing
Essential Computing Limited	LMS365 (Learning Management System)	01/10/22	30/09/24	Yes	30/09/2026	£32,436	£135,994	Resources & Commercial
Lawrence Lynch Developments Ltd (LLD)	Pinnora Mews Site Management & Completion of Final Works	01/10/22	30/09/22	No	N/A		£150,000	Place - Regeneration & Planning
Harrow Together	Household Support Fund (Third Iteration) Community Hub / Harrow Help project - Universal food offer and winter warm packs	01/10/22	31/03/23	no	n/a		£140,000	Resources
Prospects Services Ltd	Careers Information Advice and Guidance Support Service	01/10/22	30/09/27	Yes	30/09/2029	£366,667	£1,922,709	Peoples - C&F
Sovereign Group Limited	Chichester Court - Windows Renewal	05/10/22	04/03/23	No	N/A	£333,809	£333,809	Place - Housing
Capita Resources Limited (Capita Security Watchdog)	DBS Checks	01/11/22	31/10/23	yes	31/10/2024	£90,000	£180,000	Resources & Commercial
Connells Residential	Sales and Marketing services for Grange Farm Phase 1 Shared Ownership homes	03/11/22	02/11/23	yes	02/05/24	n/a	1.25% of the estimated gross sales proceeds to be paid on completion of sales of units	Place - Housing
Esri UK Ltd	Provision of Geographic Information Systems (GIS) Software and Support	09/11/22	09/10/25			£62,978	£188,934	Resources & Commercial
Thomson Reuters Sweet & Maxwell	Knowledge Management Law Library	01/12/22	31/11/2025	No	N/A	£123,338	£388,823	Resources
Melis Consultants Ltd	Flood Management	01/12/22	30/11/27	no		£100,000 for first 4 years and final year £99,500	£499,500	Place - Communities
Imovo Limited	Payment Solutions - Lot 3: Fund Disbursement Solutions for the Provision of Local Government Funds Disbursement (Household Support Fund)	02/12/22	01/12/24	no		£0	£0	Resources - Strategy & Partnerships
Collier Contracts Limited	Demolition of Garages and construction of 5 bungalows, 4 flats and a community space at Brookside Close estate HA2 9AW	06/12/22	05/12/23	no		£4,209,806	£4,209,806	Place - Housing
Ventro Ltd	Fire Doors Programme (Lot 1: Schools)	10/12/22	31/07/2023	No	N/A	£1,111,243.73	£1,111,243.73	Place - Environment
<b>Total</b>							<b>£78,650,313</b>	
<b>Number of Contracts</b>							<b>56</b>	

Contracts Awarded between January 2022 & December 2022

Main Contractor	Title (*)	Start Date	Initial contract End Date	Extension available Yes/No	Extension end date	Annual Value	Total Value of Contract/ Framework	Department
Community Connex DARE KIDS Kids Can Achieve	Short breaks for disabled children - Framework	09/01/22	31/08/2023	Yes	31/08/2024	£370,000	£370,000	Peoples - C&F
Harrow Together	Harrow Community Champion Programme	11/01/22	30/04/24	no	n/a	£300,000	£300,000	Peoples - C&F
Family Action	Harrow SEND Information Advice Service (SENDIAS)	01/04/22	31/03/25	Yes	30/03/2027	£87,292	£436,981	Peoples - C&F
Compass - Services to Improve Health and Wellbeing	Harrow Young People's Substance Misuse Service	01/04/22	31/03/25	No		£239,000	£716,894	People - Public Health
Young Harrow Foundation	Young Harrow Foundation (YHF) to coordinate the delivery and evaluation of the DfE funded Holiday Activities and Food Programme and other grant funded activities on behalf of the Council and partners	01/04/22	31/03/25			£213,477	£213,477	Peoples - C&F
Metropolitan Housing Trust	Extra Care Provision - Ewart House	25/07/22	24/07/27	Yes	24/07/2029	£926,724	£4,747,751	People - Adults
Prospects Services Ltd	Careers Information Advice and Guidance Support Service	01/10/22	30/09/27	Yes	30/09/2029	£366,667	£1,922,709	Peoples - C&F
<b>Total</b>							<b>£8,337,813</b>	
<b>Number of Contracts</b>								<b>7</b>

Contracts Awarded between January 2022 & December 2022

Main Contractor	Title (*)	Start Date	Initial contract End Date	Extension available Yes/No	Extension end date	Annual Value	Total Value of Contract/ Framework	Department
Avison Young (Uk) Ltd	Commercial and Financial Advisor HSDP	03/01/22	03/01/24	Yes	03/01/2026	£69,000	£276,000	Place - Regeneration & Planning
Senator	Depot Fit Out	04/01/22	04/01/23	No		£692,482	£692,482	Place - Regeneration & Planning
Each Counselling and Support	Rough Sleeping Accommodation Programme	10/01/22	31/03/24	No		£124,039	£279,988	Place - Housing
Milestone Contracting Limited	Renewal of Roofs - Residential Street Dwellings	11/01/22	31/05/22	no	n/a	£358,084	£358,084	Place - Housing
NR Limited (trading as Cornerstone Personnel)	Managed Service for Special Needs Transport & Associated Services	25/01/22	03/04/26	Yes		£4,900,000	£34,972,510	Place - Communities
HLM Architects	Harrow New Civic Design Advisor	31/01/22	01/02/24	Yes	01/02/2026	£36,960	£147,840	Place - Communities
Wybone Ltd	Food Waste Bin Housings	01/02/22	30/01/23	NO		£275,000	£275,000	Place - Communities
Ridge & Partners LLP	Employer's Agent for the Housing In-Fill Programme Lot 1	21/03/22	20/03/25	Yes	20/03/2026	£150,000	£504,700	Place - Housing
Airey Miller Ltd	Employer's Agent for the Housing In-Fill Programme Lot 2	21/03/22	20/03/25	Yes	20/03/2026	£150,000	£691,323	Place - Housing
New Era Fuel	Bulk Fuel Supply	01/04/22	31/03/24	No		£150,000	£150,000	Place - Communities
J B Riney & Co Ltd	Bannister Sports Centre - Overflow Car Park	04/04/22	03/03/23	No	No	£244,205	£244,205	Place - Economy & Culture
Bouygues E&S Solutions Ltd	Decarbonisation Works	20/04/22	31/12/22	No		£543,493	£615,510	Place - Climate Change & Natural Resources
Network Rail Infrastructure Ltd	Kodak Footbridge - Wealdstone	22/04/22	22/04/23	No		£339,885	£339,885	Place - Communities
Anglian Water Business (National) Limited Trading as Wave	Water Supply Contract	01/05/22	30/04/24	Yes	30/04/2026	£471,500	£1,886,000	Place - Climate Change & Natural Resources
Wex Europe Services Ltd	Fuel Cards Services	01/05/22	30/04/27	Yes	30/04/2029	£897,325	£6,281,278	Place - Communities
Char.gy Ltd	Residential Charge Points	01/05/22	30/04/27	No	No	£109,000	£109,000	Place - Communities
Harcross Specialist Contractors Ltd	237 Long Elms Fire Reinstatement Works	25/05/22	25/08/22	No	No	£163,635	£163,635	Place - Housing
DSSL Group Ltd	CCTV Infrastructure Upgrade and Maintenance	14/06/22	13/06/27	yes	13/06/2032	Year 1 Capital £1,087,599.13  Annual Support & Maintenance (Years 1-10) £784,500.00	£1,872,099	Place - Communities
Symology Ltd	Highways Asset Management Community Engagement Software	21/06/22	20/06/24	Yes	20/06/2026	£93,953	£375,812	Place - Communities
Freeway Lift Services Ltd	Lift Services - Specialist Equipment	13/07/22	12/07/23	No		£200,000	£200,000	Place - Housing
Borras Construction Limited	Fit out works at Sheldon House, Gayton Road	28/07/22	27/11/23	No			£662,287	Place - Communities
Gateville Group	Pinner Grove Communal Flooring Renewal	01/08/22	21/10/22	No	No	£100,123	£100,123	Place - Housing
Abavus Limited	Supply and Support of Council Services Digital Transformation Platform	01/08/22	31/07/24	yes	31/07/2026	£35,414	£141,654	Place - Communities
Compass Minerals UK Ltd	Supply of de-icing Brown Rock Salt	03/08/22	31/07/26	No	No	£120,500	£482,000	Place - Communities
Lift Maintenance	Lift & Engineering Services Ltd	12/08/22	11/08/27	No	No	£60,000	£300,000	Place - Communities
W G Wiggington Limited	Security and Compliance - Homesafe 3	14/09/22	14/09/24	Yes	14/09/2026	£1,013,480	£4,053,920	Place - Housing
Lawrence Lynch Developments Ltd (LLD)	Pinnora Mews Site Management & Completion of Final Works	01/10/22	30/09/22	No	N/A		£150,000	Place - Regeneration & Planning
Sovereign Group Limited	Chichester Court - Windows Renewal	05/10/22	04/03/23	No	N/A	£333,809	£333,809	Place - Housing
Connells Residential	Sales and Marketing services for Grange Farm Phase 1 Shared Ownership homes	03/11/22	02/11/23	yes	02/05/24	n/a	1.25% of the estimated gross sales proceeds to be paid on completion of sales of units	Place - Housing
Metis Consultants Ltd	Flood Management	01/12/22	30/11/27	no		£100,000 for first 4 years and final year £99,500	£499,500	Place - Communities
Collier Contracts Limited	Demolition of Garages and construction of 5 bungalows, 4 flats and a community space at Brookside Close estate HA2 9AW	06/12/22	05/12/23	no		£4,209,806	£4,209,806	Place - Housing
Ventro Ltd	Fire Doors Programme (Lot 1: Schools)	10/12/22	31/07/2023	No	N/A	£1,111,243.73	£1,111,243.73	Place - Environment
<b>Total</b>							<b>£61,368,450</b>	
<b>Number of Contracts</b>							<b>32</b>	

**Contracts Awarded between January 2022 & December 2022**

Main Contractor	Title (*)	Start Date	Initial contract End Date	Extension available Yes/No	Extension end date	Annual Value	Total Value of Contract/ Framework	Department
TechnoWorld	Supply of laptops	07/02/22	06/02/23	No		£169,000	£171,913	Resources & Commercial
Bytes Software Services Ltd	IT Consultancy and Support	14/02/22	31/10/22	No	No	£479,705	£479,705	Resources & Commercial
Zurich Municipal	Liability Insurance	01/04/22	31/03/25	yes	31/03/2027		£1,153,190	Resources & Commercial
Protector (AON will invoice on behalf of)	Property Insurance	01/04/22	31/03/25	yes	31/03/2027		£655,585	Resources & Commercial
Accenture	SAP Payroll Contingency for D365	01/04/22	31/12/22	No		£300,000	£300,000	Resources & Commercial
Dotted Eyes / Miso	FME Software	01/04/22	31/03/26	No		£41,000	£164,000	Resources & Commercial
The Romanian and Eastern European Hub	Homes for Ukraine – Refugee Support	01/05/22	31/03/23	No	No	£177,000	£177,000	Resources
Phoenix Software Ltd	Microsoft Enterprise Agreement and Azure Cloud Agreement	01/07/22	30/06/25	No		£1,044,068	£3,957,247	Resources & Commercial
Public-I Group Limited	Hybrid Streaming Solution	29/07/22	28/07/27	No		£3,920	£149,659	Resources & Commercial
Harrow Citizens Advice Bureau Ltd	General Information and Advice Service	01/08/22	31/07/23	Yes	31/07/2024	£216,000	£432,000	Resources & Commercial
Medigold Health Consultancy Limited	Occupational Health & Employee Assistance Programme Contract	01/09/22	31/08/25	No	n/a	£90,000	£270,000	Resources - HR
Essential Computing Limited	LMS365 (Learning Management System)	01/10/22	30/09/24	Yes	30/09/2026	£32,436	£135,994	Resources & Commercial
Harrow Together	Household Support Fund (Third Iteration) - Community Hub / Harrow Help project - Universal food offer and winter warm packs	01/10/22	31/03/23	no	n/a		£140,000	Resources
Capita Resources Limited (Capita Security Watchdog)	DBS Checks	01/11/22	31/10/23	yes	31/10/2024	£90,000	£180,000	Resources & Commercial
Esri UK Ltd	Provision of Geographic Information Systems (GIS) Software and Support	09/11/22	09/10/25			£62,978	£188,934	Resources & Commercial
Thomason Reuters Sweet & Maxwell	Knowledge Management Law Library	01/12/22	31/11/2025	No	N/A	£123,338	£388,823	Resources
i-movo Limited	Payment Solutions - Lot 3: Fund Disbursement Solutions for the Provision of Local Government Funds Disbursement (Household Support Fund)	02/12/22	01/12/24	no		£0	£0	Resources - Strategy & Partnerships
<b>Total</b>							<b>£8,944,050</b>	
<b>Number of Contracts</b>								<b>17</b>

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