



Homelessness Strategy

Harrow

2013 - 2018

Draft for Consultation

November 2012

Version: 0.18



Introduction

1. Local housing authorities have a duty to review homelessness in their district and formulate and publish a strategy based on the results of the review under the [Homelessness Act \(2002\)](#).
2. Building on the existing strategy, this document details Harrow's response to the difficult housing choices, as well as the opportunities offered by the Localism and Welfare Reform Acts, that the Council will have to make in meeting its homelessness duties. In particular, this document is central to delivering the draft housing strategy's overarching objective of **'Continue to tackle homelessness by improving access to, and improving standards in the private rented sector.'**
3. Through this draft homelessness strategy, the Council is able to:
 - Provide a strategic framework for the delivery of a statutory homelessness service, including targeting resources where needs are most pressing
 - Identify actions to tackle homelessness, including actions to achieve the objectives within this strategy and the draft housing strategy
 - Set out a joined-up approach to addressing the challenges facing housing through companion strategies including the draft private sector housing strategy; draft tenancy strategy and a new allocations scheme, all of which should be read in conjunction with this document.
4. Together, with the welfare reform agenda and the changes to the way that social housing is allocated, let and managed, discharging homelessness duty with a 'suitable' offer of private rented sector (PRS) accommodation will mark a shift change to the way that Harrow discharges its future homelessness duties.
5. As the full extent of the welfare reforms, particularly in relation to housing benefits and local housing allowance, take effect over the life of this strategy, suitable and economically realistic housing options outside of Harrow will increasingly be the only viable options open to households in need.

Part 1 - Context

National

6. Tackling homelessness is a key priority in the [Government's Housing Strategy](#). Additionally, a cross Whitehall Ministerial Working Group in addressing the inter-related issues contributing to homelessness has published two reports. The government has adopted the second report '[making every contact count](#)' as its homelessness strategy. In this, it sets out its aims to tackle the causes of homelessness; early prevention and supporting the delivery of individual recovery services. The Government also challenges local housing authorities to deliver better homelessness services through '*10 local challenges*'.¹ Two other national policies particularly significant to the Council's strategy in addition to above and '[The Homelessness \(Suitability of Accommodation\) Order 2012](#)' are detailed below.

Localism Act (part 7) and social housing reform

7. The key proposal relating to homelessness gives local authorities a new ability to discharge their homelessness duties with an offer of suitable accommodation in the PRS.
8. Discharging into the PRS is an option which Harrow will increasingly be forced to rely on in future years because of several factors. These include increasing homelessness levels as welfare reforms impact on residents in earnest; a greater focus on homelessness prevention; lower supply of new social housing due to funding reductions and changes to rents in the social rented sector. By no longer being compelled to offer social housing tenancies, the Council will ensure that the most economically realistic housing solution is offered to households in need. This will often be in the PRS, where choice and supply are higher than the social housing sector.
9. The freedoms and flexibilities to discharge into the PRS complement other Government social housing reforms aimed at delivering strategic housing objectives, especially as to who may be offered social housing. Further details of Harrow's approach to only allow registrations to applicants who meet the 'reasonable preference' criteria; giving greater priority to applicants with a 'local connection' and contributing to the community; adopting flexible tenancies (for new social housing tenants) and giving additional preference to ex-armed forces personnel "where they have urgent housing needs" are contained in the draft Tenancy Strategy; draft Allocations Scheme; draft Private Sector Housing Strategy and draft Housing Strategy.

¹ The first report of the working group was published in 2011 'Vision to end Rough Sleeping: No Second Night Out' and was aimed at addressing rough sleeping.

Welfare Reform Act

10. Changes to the Housing Benefits system have already been implemented and further changes will take place over the next few years. The most significant changes have:
- reduced Local Housing Allowance (LHA) support for tenants in from the 50th percentile to the 30th percentile rent levels in the PRS.
 - introduced an overall maximum cap on the amount of LHA support that can be paid according to bedroom size, (set at 4 bedrooms)

Both these changes are impacting on the ability of households in need and reliant of HB to find suitable PRS accommodation within Harrow. These changes also limit the choice of affordable PRS homes for households claiming benefits in Harrow and may make it increasingly difficult for the council to find suitable homes in Harrow.

11. Other changes introduced under the Act include raising the age limit for Shared Accommodation Rate to 35; increasing deductions for non-dependent adults which could lead to increased rent arrears; and reducing benefits for working age households who live in social housing that is larger than their requirements.

Homelessness Legislation

12. The 1996 Housing Act (as amended by the 2002 Homelessness Act) is the main piece of homelessness legislation and sets out the legal duties that all local authorities have towards people who are homeless.

Regional

13. The Greater London Authority (GLA) in December 2011 published '[A Revised London Housing Strategy](#)' for public consultation, and it is expected that the final strategy will be published by the end of 2012. The LHS covers a number of policies to ensure that homeless households receive adequate access to accommodation (policies 1.2A – 1.2L).² The draft LHS, also contains details on a number of new additional targets to tackle rough sleeping in London. It's 'No Second Night Out' initiative aims to prevent rough sleepers from sleeping out for more than one night and reconnects rough sleepers to services in their home area.

Local

14. Overarching objectives were approved by Cabinet in 2011 to develop Harrow's response to the national policies changes and this strategy supports these overarching objectives, as detailed in the table below:

² Policies 1.2A-1.2L covering access to rented housing can be found in appendix 2, or downloaded from the GLA's website:
<http://www.london.gov.uk/sites/default/files/London%20Housing%20Strategy%20Dec11.pdf>

Housing Strategy Objectives	Homelessness Strategy Objectives and priority actions
Continue to tackle homelessness by improving access to, and improving standards in the private rented sector	1. Early intervention to prevent homelessness <ul style="list-style-type: none"> • Good quality housing advice and accessible prevention services 2. Support homeless households and those in housing need to secure economically realistic housing <ul style="list-style-type: none"> • Enable access to economically realistic housing • Support Landlords and improve [conditions] in the PRS • Address the needs of vulnerable households, including rough sleepers and single person households
Enhanced housing options, promoting mobility and choice	2. Support homeless households and those in housing need to secure economically realistic housing <ul style="list-style-type: none"> • Affordability, money and debt advice • Working in partnership to make best use of fewer resources and best practice

15. Initial consultation on the Council's response to the various housing policy changes started in summer 2011 with a series of events held across the borough. In addition, a number of community based events, and meetings with organised interest groups were also held at various locations across the borough as well as an online consultation, via the Council's website.

16. This strategy should be read alongside the draft Tenancy Strategy; draft Allocations Scheme; draft Private Sector Housing Strategy and draft Housing Strategy.

Key information and facts on Homelessness

17. Nationally, homelessness is increasing. Statistics shows that in the second quarter of 2011 a 17% increase in statutory homelessness had occurred compared to the same period in 2010. Levels of homelessness are expected to increase as further reform to housing and welfare benefits, particularly the transition to Universal Credit, is completed.

18. The council has produced a separate [evidence base](#) to support the decision making for a range of housing strategies. Key information and trends on housing needs and homelessness from this evidence base show:

- There are up to 5,000 households on the housing register at any one time.
- There were 63 families living in council provided Bed & Breakfast accommodation at the end of September 2012. This is a significant increase in the use of emergency and temporary accommodation in the past year and has increased from single figures in 2011.
- Advice and information is given in more than 1400 cases each year.
- Prevention of homelessness in more than 1000 cases annually (generally far above the levels recorded by other councils with comparable high levels of homelessness presentations) has resulted in some of the lowest levels of homelessness acceptances in London.
- Homelessness decisions made in recent years (number of cases): 2009/10(317); 2010/11(335) and 2011/12 (368),
- Homelessness presentations, whilst affecting all communities, are higher from 'Black' ethnic minority groups. National research has found the same.
- Female lone parent households with dependents made up approximately half of households assessed as 'unintentionally homeless and in priority need' over the past three years.
- A higher proportion of applicants from the 25-44 age group than any other age group were accepted. This is expected to increase as the changes to single accommodation rates are implemented and begin to impact on the local communities.
- Main reasons for homelessness acceptances over the same period were:
 - Loss of a private sector tenancy; and
 - Parents; friends or relative(s) not willing or able to accommodate.
- The number of households accepted as homeless due to mortgage arrears is extremely low: 1 case in 2011/12 and 1 case in 2009/10

Welfare Reforms

- 17% of all of Harrow's households receive housing benefits
- 73% of households receiving HB are of working age
- The £500 benefit cap for non working households is likely to impact around 700 households in Harrow.
- Families with large numbers of children are predicted to be hardest hit by the benefits cap
- Further research on larger families indicates a shortfall (£50 - £340) between their benefit support and rents they currently pay
- An estimated 169 households will be affected by the change in age criteria for the LHA rate to a room in shared accommodation.

Housing & supply

- Approximately 10% of the borough's total dwelling stock is social rented, private rented is approximately 20%, and owner occupier accounts for 70%.
- The council re-houses approximately 400 households each year in social housing.

- Of the social rented units available for letting in 2011/12, 50% only had 1 bedroom, whilst just 5% had 4 or more bedrooms. Yet over 90% of those accepted as homeless are couples or lone parents with dependent children.
- Between 2009/10 and 2011/12 more than 800 households were rehoused in the private rented sector (PRS) through the Council's Help2Let scheme.

Part 2 – Our Objectives

19. Homelessness can often be prevented, if help is sought early enough. With the right advice, at the right time no-one should become homeless intentionally. It can help those at risk of becoming homeless to remain in their existing home and prevent the trauma of having nowhere to live.

20. Our objectives are in the first instance to prevent homelessness at an early stage and secondly, where this is not possible, to support homeless households and those in housing need secure economically realistic housing. These objectives will be delivered through the following priority actions:

- 1 Good quality housing advice and accessible prevention services**
- 2 Enable access to economically realistic housing**
- 3 Support Landlords and improve [conditions in] the PRS**
- 4 Affordability, money and debt advice**
- 5 Address the needs of vulnerable households, including rough sleepers and single person households**
- 6 Continue working in partnership to make best use of fewer resources and best practice**

1. Good quality housing advice and accessible prevention services

Access to information and advice

21. The Council's in-house advice service is the main point of contact for most households at risk of homelessness. Voluntary sector partners such as Harrow Citizens Advice Bureau (CAB) and the Single Homelessness Forum also offer a range of housing and homelessness advice services. In addition to face to face advice information is also available online enabling service users to access information that is relevant, accurate and updated on the Council's website.

Prevention Services and support

22. As demand for our housing and homelessness services continues to grow, it is increasingly important to encourage and support self help. Support services and self help solutions offered include (as appropriate in the individual circumstances):

- Referral to work and training providers with a view to enhancing long-term income and acceptability as prospective tenants to landlords
- Debt and income maximisation/ budgeting advice / mortgage advice
- Benefit entitlement checks
- Referral to the West London Single Homeless Accommodation Scheme

- Identify voluntary and community organisations to assist with grant/funding e.g. rents in advance for drug and alcohol users.
- Shared ownership and other low cost home ownership and key worker scheme opportunities
- Voucher scheme for single homeless people
- Rent Bond through the Help2Let agency – removing a barrier that prevents homeless households accessing suitable private rented accommodation
- Sanctuary Scheme – enabling households threatened with homelessness due to domestic violence or hate crimes to remain safe in their current home
- Sheltered housing (both social rented and leasehold) for older people
- Supported housing for people with learning difficulties; other special needs; vulnerable young people and teenage parents
- Family Mediation –working with families to resolve issues that lead to young people being unable to remain at home
- Referral to a floating support scheme to enable vulnerable customers to better sustain their tenancy
- Advice about grants available to provide better heating in a home that is too cold
- Information for parents about childcare schemes and financial assistance

23. As well as these services, the Council recognises that not everybody presenting as homeless requires a full assessment. As the Council increasingly moves to a triage system for assessments, many people will be signposted to other relevant services, or provided with information to facilitate self help. However, where homeless households require support the Council will aim to meet these needs through a range of services.

Tenancy Sustainment

24. The Council continuously develops good practice and innovative ways to help households maintain existing tenancies. An example of this is the Tenants Training scheme which the Council's Help2Let agency provides to all new tenants it secures accommodation for in the PRS. Objectives 2 and 4 in the draft Private Sector Housing Strategy contain further details of other initiatives and schemes. For instance, as part of independent living under the Supporting People Programme, specialist floating support and tenancy sustainment for vulnerable households is provided to help them sustain their existing tenancies.

2. Enable access to economically realistic housing

25. The draft Housing Strategy identifies the importance of increasing the supply of affordable housing in Harrow. However historically Harrow has one of the lowest amounts of social housing in London. Given the current economic climate, the Council will need to ensure that all

housing options are open to homeless households. With the supply for lettings of new and existing social rented housing predicted to decrease and unlikely to increase in the short to medium term, the Council will continue to work in partnership to deliver new affordable homes. Alongside this, it will also need to manage the service users' expectations to ensure that access to economically realistic housing solutions are maximised. This will mean that housing options will not be limited to social rented housing, and increasingly solutions will be in the PRS. In taking this approach, the Council will continue to meet housing need, prevent homelessness and reduce the use of temporary accommodation.

The Private Rented Sector

26. The PRS in Harrow has increased in recent years, and is now approximately twice the size of the social rented sector. Through a combination of government policy changes and pressures on social housing the PRS is increasingly important as a source of accommodation for homeless households and those in need. For many, this is their only realistic housing option in meeting need within a reasonable timeframe, and the Council has used the PRS both to prevent homelessness and also in qualifying offers to end homelessness duties.
27. The shortfall of social rented housing, reductions in LHA support, and other deductions such as Council Tax Benefits mean that while the Council will seek to find suitable PRS accommodation in the Borough, this may not be affordable in the long term for all households. The availability of suitable PRS accommodation may further reduce if local policies developed to support households affected by the welfare reforms are too generous or not in line with other local authorities sub-regionally/regionally. In addition, the Pan-London Agreement on Inter-Borough Accommodation Placements, may also impact on the Council's ability to secure access to economically realistic housing solutions for Harrow's residents. The potential increase in demand and competition for the lower quartile PRS accommodation will mean that accommodation further away from Harrow and London will increasingly be the only realistic option for low-income or households in receipt of benefits and as household income levels decrease.
28. It is recognised that the PRS may not be suitable for all homeless households and therefore the council will assess on a case by case basis. However, the Homelessness (Suitability of Accommodation) Order 2012 lays the rules which local authorities must consider when discharging homelessness duties into the PRS. The Council will need to ensure that:
 - The location of the accommodation offered is suitable for all members of the household; and so far as is reasonably practicable secure accommodation within the authority's own district.
 - Properties meet acceptable standards of condition and repair

- Tenancies granted are for a minimum 12 months period – the expectation is that most households will occupy the home for longer. The duty recurs if the tenant becomes unintentionally homeless in the first 24 months.

29. Although loss of a PRS tenancy is recorded as one of the main reasons for homeless acceptances at present the Council uses a number of measures to prevent homelessness in the PRS. Negotiation or legal advocacy and other assistance through the Help2Let scheme has either helped in accessing alternative PRS accommodation or maintain existing homes in the PRS.

30. In recognition of these facts and in exercising its powers to discharge homelessness duties into the PRS and taking account of statutory guidance we are proposing to introduce the policy attached at appendix 1 to support the decision making process in discharging into the PRS. The Council has been already been assisting households with PRS accommodation, and between April and the end of September 2012, 135 households were accommodated in the PRS, of which 18 households were accommodated outside of London.

Making the best use of existing social housing stock

31. Given the deficit between the need for and supply of affordable housing, it is vital that the Council makes best use of the Borough's existing housing stock. In common with other London Boroughs, Harrow has a number of initiatives and schemes to address the issues of high demand and low supply. The draft Tenancy Strategy and Policy set out how we intend to introduce flexible fixed term tenancies for new social housing tenants.

32. The greater freedoms to decide who is allocated social housing, has allowed the Council to revise its Allocations Scheme. Principally changes being made will address the following issues:

- The mismatch between the demand for, and availability of social housing lettings: We will reduce the number of households with a high priority for re-housing. Those who register for housing will only be prioritised and allowed to bid for social housing if they have a need in accordance with the local and reasonable preference categories, as outlined in the Allocations Scheme
- Assisting the process of homeless prevention: households will be encouraged to resolve their own housing issues where possible, without relying on a housing register solution

Other ways in which the Council is seeking to better use its housing stock are detailed below.

Under Occupation scheme

33. The Council provides a range of incentives to enable households that are under occupying to move to more suitably sized accommodation and free up larger properties, and an under-occupation officer has been appointed to encourage more moves and registrations. Between 20-30

under-occupied properties per year have been made available through initiatives under this scheme. A project team will be reviewing the existing incentive scheme with a view to updating it and ensuring that it maximises the numbers of moves that take place.

Social Tenancy Fraud Initiative

34. The use of social housing by those not entitled to it is not only fraudulent, but it also deprives a household with a genuine housing need. The Council has successfully recovered 10 properties from fraudulent use and others are in the pipeline. The Council already has in progress a number of prosecutions.

Cross Borough Moves (Locata)

35. The Council works with other Locata partners (offering choice based lettings) across the sub region to achieve cross borough moves.

Temporary Accommodation

36. Councils must secure emergency temporary accommodation (TA) for homeless households whilst their cases are assessed. The Council will continue working sub-regionally to ensure that value for money in procuring temporary accommodation is achieved. TA may be in the form of bed and breakfast or hostel accommodation. Although the Council met the government's target to reduce TA use by half in 2010, its use is growing and future demand is predicted to grow due to the impact of welfare reforms.

37. The Council is taking and developing actions to manage the use of TA include:

- Actions to reduce the use of short-term accommodation
 - Discharging future homelessness duty into the PRS, (where this the suitable option)
 - Direct Leasing of PRS properties
 - Making decisions on homelessness applications within the recommended timeframe (33 days)
- Actions to reduce the length of stay in temporary accommodation.
 - Explore housing options with households who have been in TA for a long period, including options for non-dependent adults living in larger households
 - Continue to make management bids for homeless households who are not actively bidding on LOCATA
 - Secure economically realistic accommodation in the Private Rented Sector through the Help2Let agency's work with private sector landlords

38. The Council will continue to ensure that in the absence of suitable private rented accommodation, good quality TA is available for households owed a duty. However we cannot guarantee that this will be within Harrow. Where households are placed at a significant distance from Harrow, the Council will provide assistance with the associated costs, such as relocation costs.

Access to Home ownership

39. As part of its wider housing responsibilities, the Council works with Housing Association partners and the GLA to offer low cost home ownership products. Households who are not entitled to assistance under Homelessness duties or cannot buy a suitable home on the open market may be entitled to support under the 'First Steps' branded scheme. In Harrow, priority for these schemes is given to the groups according to the First Steps criteria, details of which can be found on the First Steps website (www.firststepslondon.org).

3. Support Landlords and improve [conditions in] the PRS

40. Recent experience and evidence demonstrates an increasing use of the PRS in meeting the Council's homelessness obligations. The council is committed to assisting households unable to resolve their housing difficulties with the help of advice or referral alone, by improving their ability to access suitable and economically realistic housing either within or outside the borough. It is equally committed to working with landlords to ensure services meet their needs and also attract new landlords to work with the service.
41. The support package offered to landlords, through the Council's trailblazing 'Help2Let' agency provides a range of services for landlords ranging from tenant finding to full management services. The Council offers advice and assistance, floating support, quick lettings and better liaison with Housing Benefits service to assist landlords working with the Council. The council is looking at opportunities to contract Help2Let's services to provide advice and assistance where social landlords will not renew a fixed term tenancy.
42. The Council's partnership approach to working with PRS landlords assists households to remain in PRS accommodation. The Council has in place a range of financial assistance packages to support landlords in return for nomination rights over the property. Details of these schemes are contained in the draft Private Sector Housing Strategy. The Landlord Forums, hosted by the Council are important opportunities for consultation and engagement between landlords and the Council.
43. The Council also has responsibilities to ensure that conditions within the PRS are of a suitable standard. Landlords engaged through Help2Let are encouraged to register with the London Landlords Accreditation Scheme, which in turn should make them better landlords. Enforcement powers to tackle unsatisfactory conditions in the PRS are detailed in the draft Private Sector Housing Strategy.

4. Affordability, money and debt advice

44. Debt and financial exclusion is a common problem for people who are homeless or approach the Council's housing service. The current

economic climate is continuing to impact on a household's credit; reducing the availability of mortgage products, especially for first time buyers and those with low incomes; and is leading to an increase in homelessness approaches.

45. In addition, Housing Advice Officers have been giving basic financial and budgeting advice to households either presenting or accepted as homeless. Our partners, in particular the CAB and Harrow Law Centre, also provide financial advice. Money and debt advice is important to mitigate the risk of homelessness due to welfare reforms and the overall benefit caps. Advice is being targeted at the 700 households, identified as facing benefits losses of between 50 and 340 pounds per week. Further details of the Council's work on providing assistance to gain employment and increase household income are contained in the Economic Development Strategy.

46. The Housing Service will continue to work with the Benefits service to target the following groups in order to prevent them becoming homeless as a result of welfare reforms:

- Households affected by the removal of the 5-bed Local Housing Allowance (50 known households so far)
- Households whose properties will become unaffordable as a result of the caps to be introduced in April 2013 (over 700 households identified)
- Households affected by deductions in housing benefit payments due to the presence of non-dependent households
- Under 35s affected are eligible for exemption from the shared room rate. We need to ensure that the vulnerable individuals in this category are making the most of this exemption to secure appropriate accommodation

5. Address the needs of vulnerable households, including rough sleepers and single person households.

47. Many people can become homeless or be threatened with homelessness because of a specific support need. There can be many reasons, such as disability or issues such as drug and alcohol misuse, and by identifying support needs we can prevent homelessness through targeted and specialist support.

Mental Health

48. The Council's Supporting People programme commissions floating support services to support vulnerable residents settle into and maintain their tenancies and homes. There are generic and specialist support services available for people up to a maximum of two years. Homeless households with mental health issues are provided with advice and support on their housing options, benefits entitlements and any other issues connected to housing.

Learning disabilities

49. The Housing Service assists people with learning disabilities to move on from residential care into supported living schemes or alternative accommodation. The Council's Supported Accommodation Strategy contains further information.

Physical disabilities

50. The Council's Home Improvement Agency provides grants for qualifying households to adapt their homes to meet their needs and prevent homelessness. The HIA service is being expanded to ensure that an increased number of older, disabled and vulnerable households are supported through its services. Additionally, the Handyperson scheme assists households to remain in their existing homes by making minor repairs to the homes of disabled or older people.

Rough Sleepers³

51. Historically, rough sleeper numbers in Harrow has been low and in the 2011 annual count of rough sleepers an estimated 1 rough sleeper was returned for Harrow. However, evidence that rough sleeping is increasing because of the economic climate and Housing Benefit changes is emerging. For instance, since the beginning of the year 14 verified rough sleepers who either approached or were referred by the London No Second Night Out (NSNO) assessment hub to the Council have been assisted. Additionally, low numbers of visible rough sleepers masks the higher number of single non priority 'sofa surfers' or hidden homeless.
52. Thames Reach's London Street Rescue service and the NSNO are the current outreach services that work with rough sleepers in Harrow. Local voluntary and community organisations also provide drop-in services at Victoria Halls. They provide advice, practical assistance and referrals into hostels and other support services. More recently, the Ascension Trust, has started operating a 'Street Pastors' service aimed at assisting rough sleepers to break the cycle of rough sleeping.

Partnership working

53. The Council works with partners across West London to provide a comprehensive set of services for rough sleepers and develop a West London Action Plan to End Rough Sleeping. The action plan included a number of joint initiatives to end rough sleeping in West London. Included in the action plan are services to prevent rough sleeping by providing options; advice and facilitating access to the PRS. Further details of sub-regional work on rough sleeping can be found on the partnership's [website](#).
54. The Council also works with 'Firm Foundations' to provide an annual winter weather shelter. It is funded by six churches in Harrow.

³ See <http://www.communities.gov.uk/documents/housing/pdf/157482.pdf> pg.8 for the Government's definition of a rough sleeping

Harrow's, as well as other London Boroughs' housing advice teams refer rough sleepers to the shelter during this period. The shelter has ten bed spaces and only takes male residents, who are given a bed space for the night on a nightly basis. The aim of the shelter is to provide safe dormitory style overnight, where residents are provided with food, washing facilities and advice and support. They are offered support in accessing local services such as benefit offices and mental health care and where possible help to find long term accommodation.

Single Homeless Households

55. Single homeless households often have multiple needs in addition to housing needs. The Government announced a £20 million homelessness transition fund to address rough sleeping and to prevent single homelessness. Administered by the West London Housing Partnership, the Council will support delivery of a range of initiatives for single homeless people such as the self-help voucher scheme given to single households to use in securing PRS accommodation.
56. Harrow will continue working with partners across the West London Housing Partnership; Harrow's Single Homeless Forum and more widely across London to ensure that existing services are fully used to prevent homelessness for single households that do not have statutory priority need, as long as financial support continues to be made available by the DCLG.
57. The West London homelessness strategic action plan contains the objectives below to address the needs of single homeless households and rough sleeping. The Council will continue working with partners to increase access to the PRS for single homeless households to deliver these objectives:
 - 2.5a Increase the incentive and expand the provider list
 - 2.5b Implement volunteer scheme to increase capacity
 - 2.5c Review provider list & voucher scheme & decide whether to allow boroughs to use funds for deposits etc.
 - 2.5d Work with providers and boroughs to increase numbers accessing the PRS via provider list to 26 / month
58. Further, changes to the age criteria for Housing Benefits for those aged under 35 years will have the potential to increase homelessness amongst single households. The Council will need to monitor and review any potential impact arising from this change and develop appropriate services.

Young People and those leaving care

59. The Council's prevention work targeted at young people aims to reconcile the young person and parent or guardian, as well as offering mediation services. Failing this the young person is supported through planned supported hostel placements or other pathways back into the family.

60. A House of Lords Judgement in May 2009 significantly changed how Local Authorities provide accommodation and support for homeless 16 and 17 year olds. The landmark decision determined that the primary duty to a homeless 16 or 17 year old would normally be under the Children Act (section 20). Housing and Childrens' Services have, for the last 2 years, operated successfully under a protocol covering this.
61. Under the Council's current Housing Allocation Scheme (and the proposed new scheme from early 2013), young people leaving care through approved move-on are given high priority for social housing. Under this an annual quota of 1 bedroom and studio accommodation is set.
62. The Council's homelessness service will work with schools and colleges to understand how raising the school leaving age in 2013 will affect young people experiencing homelessness. The council will also need to look at issues such as overcrowding, tenure, school attendance, and results of mediation to better inform and develop future preventative services. The Council is already reviewing the provision of young people's supported accommodation in conjunction with Registered Providers (Housing Associations) in response to emerging needs.

Older People

63. Homelessness amongst older people is low and the council will continue to provide appropriate support and services to ensure that this continues.

Other vulnerable households

64. The Council is committed to addressing the needs of other vulnerable groups including victims of domestic abuse (continuing with the sanctuary scheme), and ex-offenders.

6. Working in partnership to make best use of fewer resources and best practice

65. The wider social problems that contribute towards homelessness, if to be addressed effectively, demand working in partnership with other agencies. These wider causes can be varied, complex and mean homeless households are at increased risk of poorer health, fewer employment opportunities and lower educational attainment.

Improving employment and training opportunities

66. In taking a holistic approach to tackling homelessness and encouraging customers to help themselves to meet their housing need, tackling worklessness will be vital. Worklessness is a common contributory factor in causing and perpetuating homelessness and for many households only by accessing employment and training will they be able to secure their long term sustainable accommodation.

67. The Council, working in partnership with other agencies, is supporting households to increase their opportunities to access employment and training initiatives. For example, our Housing Association partners play a key role in helping us to tackle homelessness and deliver a range of actions. We will continue to develop the link between the Council's Housing Needs Service and advice and support around training and employment. Details of how the council aims to increase employment opportunities, support people into work or training are contained in the Council's Economic Development Strategy.

68. We propose to take the following actions to address worklessness:

- Monitor outcomes and evaluate which strategies and interventions are most successful in reducing worklessness amongst homeless clients
- An immediate focus on supporting non-working households reliant on benefits to access work and training opportunities to ameliorate the impact of welfare benefit reforms
- Work with the health and wellbeing partnership to develop joint initiatives to tackle homelessness related health issues
- Work with educational partners to raise reality of homelessness and promote educational opportunities for homeless young people.

Sub Regional Working

69. As public funding becomes increasingly scarce, efficiencies gained by working in partnership are likely to become more valuable in tackling homelessness. The Council will continue to work with the West London Housing Partnership to continue exploring all options for joint working, sharing good practice. Of particular importance are work on tackling rough sleeping and single homelessness.

Housing Associations

70. The Council will continue to work with Housing Associations to develop its homelessness services and maximise social housing options. This will include monitoring outcomes of nomination agreements to ensure that as part of their services, priorities identified in this strategy are delivered.

Health and Social Care

71. Health and social care are key areas where partnership working is essential. The council will continue to work with hospitals to ensure that admission and discharge procedures identify homeless people so that the relevant agencies are aware and have in place services to support the individuals.

Voluntary and Community Organisations

72. The Voluntary and Community Sector (VCS) provide a range of services to assist the Council to meeting its homelessness duties. Examples include the drop in services provided by the Single

Homeless Forum in Victoria Halls; advice by the CAB; assisting with the annual count of rough sleepers; and the recent work of the 'Street Pastors' in Harrow in caring, listening and helping young people. In addition the VCS continues to serve as a useful platform for consultation, sharing information and best practice.

Equalities and Diversity

73. We have used the outcomes from consultation and our Evidence Base to complete an Equalities Impact Assessment on this draft Homelessness Strategy which is available at [\[add link\]](#) for comment.

Action Plan

74. The Homelessness Strategy Action Plan details what we plan to do under each of the strategic objectives and priority actions. It focuses on the outcomes that we would like to achieve and shows how we will measure progress towards these.

75. We will monitor progress regularly and review the strategy annually, to ensure that it responds to policy changes.

ACTION PLAN

Priority Action	Actions/Milestones	Target Date
Good quality housing advice and accessible prevention services	Review the housing advice service to ensure overall value for money	On-going throughout the life of the strategy. Annual review
	Continue to maximise the number of households assisted to remain in their accommodation by delivering the range of homeless prevention services	
	Develop early intervention work to promote early access to housing and other advice services to increase the number of people assisted through homeless prevention & housing option schemes.	
	Ensure that services are delivered in a timely and accessible way, including outreach surgeries, triage and improved customer information on our website. Actively develop advice and promote employment and training to assist homeless households and prevent homelessness	
	Continue to identify and work with households and individuals whom will have the biggest reductions in their HB following welfare reforms.	
	Continue analysis of impact of welfare reform changes, identifying those most at risk and offering dedicated advice and support service to prevent homelessness	
	Continue to improve on-line and other information sources, promoting self-help and early intervention to maximise homelessness prevention and housing options	
Enable access to economically realistic housing	Implement the new allocations scheme to better align priority banding numbers to available supply and strengthen the link to maximising homelessness prevention and alternative housing options.	Implementation in 2013
	Continue to work closely with Registered Providers to maximise assistance in relation to overcrowding & under occupation to minimise homelessness and free up family sized accommodation for newly emerging demand to make best use of stock.	On-going throughout the life of the strategy. Annual review
	Promote the Help2let agency's work to increase the supply of PRS accommodation, including outside of Harrow and London, for homeless households.	
	Explore developing further options to continue leasing properties from landlords through the Help2Let agency. Maximise the use of, national and Pan-London mobility schemes to enable homeless households in harrow access	Implementation in 2013

	economically realistic housing.	
	Continue to work with Registered Providers to provide new affordable housing in Harrow. To include home ownership products for low income households.	On-going throughout the life of the strategy. Annual review
	Continue to maximise the proportion of Registered Provider nominations to ensure increased levels of lettings are available for Harrow.	
	Continue to manage and reduce the use of temporary accommodation by working with clients in TA to maximise through flow. To include use of homeless hostels and Bed & Breakfast hotels	
	Continue to make best use of the Discretionary Hardship Fund to support homeless households and those at risk of homelessness	
Support Landlords and improve [conditions in] the PRS	Support the actions in the draft Private Sector Housing Strategy's Strategic Aim 2 – enable and enforce better housing conditions in the Private Sector	On-going throughout the life of the strategy. Annual review
	Continue to work in partnership with private rented sector (PRS). Landlords to assist households to remain in or access privately rented accommodation and maintain levels households assisted into the private sector.	
Affordability, money and debt advice	Develop an affordability policy to meet the welfare reform changes setting out guidance for amount households could be expected to contribute towards rents, council tax and other shortfalls.	By April 2013
	Ensure early identification of money problems which may cause homelessness and work with partners to offer debt advice.	On-going throughout the life of the strategy. Annual review
	Work with other partners and Council Services to assist households with advice on budgetting, deposits and arrears with rents.	
Address the needs of vulnerable households, including rough sleepers and single person households.	Continue to operate specialist housing advice surgeries for vulnerable people to maximise level of early intervention work	On-going throughout the life of the strategy. Annual review
	Actively participate in the no second night out pilot to identify and address incidents of rough sleeping	Implementation in 2013
	Ensure adequate cold weather provision and explore the potential to extend the winter shelter provision beyond just winter period	On-going throughout the life of the strategy.

		Annual review
	Make best use of the sub-regional private rented sector scheme to assist former rough sleepers	
	Ensure services for single homeless households in the West London Strategic Homelessness action plan are maximised to support single homeless households	
	Continue to work with women's refuges to ensure appropriate services and refuge provision for survivors of domestic violence	
	Support projects to educate young people about the realities of homelessness and equip them to plan their housing pathways	
	Continue to participate actively and support MAPPA work to prevent re-offending and manage risk of homelessness	
	Continue to work with partners to develop support services for other identified vulnerable groups	

Working in partnership to make best use of fewer resources and best practice	Continue to work with the Single Homeless Forum to promote partnership working and prevent homelessness through advice and assistance	On-going throughout the life of the strategy. Annual review
	Work with Registered Providers in relation to homelessness prevention and delivery of this strategy	
	Continue to work through the WLHP to maximise resources targeted at homelessness prevention and improved efficiencies	
	Active participation in forums to share good practice, agree joint working arrangements and opportunities for joint funding.	
	Regular liaison and consultation with service users to directly feed into future service developments	

Consultation Questions

Q1. Do you agree that the objectives and priority actions set out in the homelessness strategy are the right ones? If not how would you change them?

Q2. Are the preventions services and support identified in paragraph 23 the right ones? Is something missing?

Q3. Are there any other actions which the Council should be developing or taking in order to prevent homelessness?

Q4. Do you agree with our action plan? Is there anything else we should be doing?

Q5. Do you agree with the proposed policy in appendix 1? If not what changes would you make?

Appendix 1: Policy on use of accommodation outside the borough in discharge of duties under Part VII Housing Act 1996 (as amended).

Section 208 of the Housing Act 1996 Act requires that in pursuance of homelessness duties, so far as reasonably practicable, a local housing authority should secure that accommodation is available for applicants in its district. However if there is insufficient affordable local accommodation, such that it is not reasonably practicable to provide accommodation locally, the court has found that a local housing authority would be justified in offering accommodation under Part VII duties outside the district, including outside London.

The relevant cases are ***R (on the application of Calgin) v London Borough of Enfield* [2005] EWHC 1716 (Admin)** and ***R (on the application of Sacupima) v Newham LBC* (2001) 33 HLR 18 (CA)**.

So far as is reasonably practicable accommodation should be provided in the borough, if accommodation that is affordable and suitable can be obtained at reasonable cost. If this is not practical, then before offering accommodation out of the district i.e. Harrow, we should consider if there are circumstances, of which we are aware, such that it may not be reasonable to move the household to accommodation out of the district. However the inability to obtain accommodation that a household can afford is also a factor in the decision, as unaffordable accommodation is not suitable.

When determining whether a family should be given priority for suitable accommodation in the borough, consider if the family have a particular requirement or need to remain in the local area:

A) Significant severe Medical Need.

Is the applicant or any member of the household receiving specialist treatment in Harrow or London that would be difficult to access near the district where the available accommodation is located, or such specialist treatment is not available outside of Harrow? Does the applicant or any member of the household have a mental illness or a learning disability and have a particular need to remain in or near to Harrow to maintain links with health service professionals and/or reliance on existing support networks and community links?

B) Significant Educational Need.

Are any of the children of the household at key stages in terms of examinations so that a change of school/college is more than usually disruptive? This could be because they are shortly to take GCSE, A Level or similar examinations. Or it could be because a child/children are receiving special needs teaching and similar teaching is not available reasonably close to the district where the available accommodation is located.

C) Significant Social Need.

(i) Is there any exceptional reason why the household has to remain in the area to enable family/friends to provide support.? Could alternative support be obtained near the district where the available accommodation is located?

(ii) Alternatively, does a member of the household provide essential support to a non resident family member? Are others able to offer this support or could that non resident family member also be assisted to move to the area where the available accommodation is located?

D) Significant Employment.

Are there any household members in employment (that is genuine and effective, not marginal and ancillary) that is likely to be long term. Would a move to the available accommodation require the employment to end? If so, is similar employment likely to be available in the district in which the available accommodation is located?

If the household moves out of Harrow into Temporary Accommodation we will periodically review whether it is practical, and meets the wishes of the household to move back into affordable temporary accommodation in Harrow at a later date.

Even where affordable accommodation is available in the borough there may be clear benefits for the applicant being accommodated outside of the borough. This could be because: (i) the applicant, and/or any member of the household would be at risk of domestic or other violence in the borough and therefore need to be accommodated out of the borough to reduce the risk of coming into contact with the perpetrator of the violence; or (ii) the applicant may be an ex-offender or drug/alcohol user and would benefit from being accommodated outside of the borough to help break links with previous contacts which could exert a negative influence. (iii) It may be a more economically realistic solution for the family putting less strain on the household budget.

The Court also found in *R (on the application of Calgin) v London Borough of Enfield* that a local housing authority would be justified in withholding suitable local accommodation from an applicant with no or limited links with the borough in the confident expectation that someone with much closer links, and for whom out of borough accommodation would not be suitable, will also be seeking accommodation within a very short time. This will also be a factor in considering the suitability of accommodation outside the district.

Appendix 2: London Housing Strategy, Renting a home: policies

Access to rented housing

1.2A - Within the overall objective of meeting housing need, boroughs are encouraged to make use of their new flexibilities to ensure that local priority groups have access to social housing, in particular to incentivise work and volunteering and to promote mixed and balanced communities while continuing to meet the needs of people in reasonable preference categories.

1.2B - The presumption is that boroughs will seek to discharge their homelessness duty within their local area, always considering the specific needs of households to remain in the locality.

1.2C - Boroughs should ensure that an appropriate balance is maintained between offers of accommodation for homeless households in the private rented and social rented sectors.

1.2D - Where the homelessness duty is discharged into the private rented sector, landlords are encouraged to offer tenancies that are for a longer period than the statutory minimum where appropriate, and boroughs are encouraged to use only those landlords with a recognized accreditation.

1.2E - All boroughs should make full use of existing and future systems that monitor cross-borough temporary accommodation placements, urgent moves and discharge of homelessness duty, and that help to ensure that all households housed out of borough have access to services.

1.2F - The Mayor will set up a joint monitoring committee with boroughs, to monitor discharge of homelessness duty.

1.2G - Housing associations should have full regard to borough tenancy strategies, where these are in conformity with the London Housing Strategy.

1.2H - Social landlords should continue to abide by the principles set out in 'Partners in Meeting Housing Need', the protocol for determining the proportions of housing association lettings available to local authority nominees.

1.2G - Unauthorised occupancy in the social rented sector should be addressed.

1.2J Social landlords are encouraged to promote employment and training opportunities to applicants and people wishing to transfer.

1.2K - The Mayor will work with the boroughs and the Department for Work and Pensions to monitor the government's Housing Benefit reforms

1.2L - The Mayor's London Rents Map will be enhanced and promoted, so that better information on rent levels is available to those seeking a home in the private rented sector.

Appendix 3: Statutory duties

Housing Act 1996 Part 7

Under Section 184 of the Housing Act 1996, a homeless application will have to be taken if local authorities have reason to believe that the customer may be homeless or threatened with homelessness. There is a requirement to provide interim accommodation, pending investigations, if there is reason to believe that the customer may be homeless, eligible for assistance and have a priority need.

Homelessness framework

A homeless person can make an application to the Council who will assess and decide what, if any, duty it owes them under Part 7 of the 1996 Housing Act. The duty may range from providing accommodation to offering advice and information depending on the individual's circumstances.

For each homeless application the Council has to consider whether the person is eligible for assistance, if the person is actually homeless, if the person is in priority need, if they are intentionally homeless and may consider if they have a local connection. This means the following:

- **Eligibility**

A person is eligible for assistance if:

- They are a British citizen or commonwealth citizen with a right of abode who is habitually resident in the common travel area.
- They are in the UK and from a European Union (EU) or European Economic Area (EEA) and exercising EU treaty rights that give them a right of residence.
- They are subject to immigration control (everyone other than the above) and have been granted leave to remain in the UK other than seeking asylum.

If a person is not eligible the Council does not have a duty to assist, but will offer advice and information and other services can be accessed such as the Citizens Advice Bureau. Non eligible persons can not join the Council's housing register.

- **Homeless criteria**

A person is assessed as being homeless if they have no accommodation available to them, either in the UK or abroad, that is reasonable for them to occupy. There are many reasons why a person may be homeless. The obvious reason is sleeping on the street, but they may also be a homeless person if they are:

- about to be evicted;
- no longer able to live with family or friends;
- at risk of violence in their own home;
- unable to pay rent or mortgage payments without being deprived of basic essentials such as food;
- leaving care or other institutional settings;
- forced to live apart from people they would normally live with due to unsuitable accommodation;
- living in very overcrowded or unsanitary conditions.

If a not homeless decision is made the person can join the Council's housing register and will be given help and advice on other ways to access suitable housing.

- **Priority need**

Priority need is the term that the Housing Act 1996 uses to define types of people who may be considered vulnerable in relation to homelessness. If a homeless person is classed as having a priority need then they may be owed certain duties by the Council. A person will normally have a priority need if they

- have dependent children living with them;
- have been made homeless by an emergency such as a fire;
- are aged 16 or 17 (social services may also have a duty to accommodate and support);
- are pregnant;
- are a care leaver who is under the age of 21;
- are vulnerable (more vulnerable than the average street homeless person).

Reasons why a person may be classed as vulnerable include:

- have had to leave their home due to violence or harassment;
- are an older person;
- have a physical or learning disability or mental health problems;
- have been in care, a young offender's institution, prison or the armed forces.

If it is decided the person is not in priority need they are still entitled to some priority on the Council's housing register, recognising the fact that they are homeless, which may enable them to secure social housing.

- **Intentionally homeless**

To be intentionally homeless the reason for becoming homeless has to be as a result of something a person did deliberately or failed to do. Examples of this could be not paying your rent or breaching other terms of a tenancy agreement. A person is expected to take all reasonable steps to avoid homelessness.

If it is decided the person is intentionally homeless they are entitled to an award of points on the Council's housing register, recognising the fact that they are homeless but may be denied an allocation depending on the reason and taking into account any mitigating factors .

- **Local connection**

The Council may also consider whether a person has a local connection to Harrow. This means they will need to have lived in Harrow for 6 out of the last 12 months or 3 out of the last 5 years, be employed in the borough, or have a close relative living in the borough, who themselves have lived here in excess of 5 years. If the person does not have a local connection to Harrow the Council may consider asking another local authority, where the person does have a local connection, to re-house them.

Homeless priority decision

Guidelines recommend that this process take no more than 33 days, although this may take longer depending on the nature of the enquiries. Following these investigations the Council must put its findings, in writing, to the customer. If the Council accepts that a person is eligible for help, in priority need and has not made themselves intentionally homeless, then there is a duty to find them accommodation. This is often called the "main duty". They are entitled to a priority on the Council's housing register, recognising the fact that they are homeless and vulnerable, giving them priority in the allocations scheme. In addition the Council will provide temporary accommodation, if required, while longer term accommodation is being sought. The duty is discharged with the following:

- an offer of long term accommodation. This could be an offer of social housing,
- an acceptance by the applicant of a “qualifying offer” in the private rented sector. If an offer is accepted in the PRS the duty can only end when an applicant signs a written statement accepting the qualifying offer.
- The refusal of the offer of suitable accommodation made by the Council.

If the customer is dissatisfied with the written decision regarding his homelessness application s/he has a right of review.

Review and appeal process

There is a period of 21 days following notification of the decision when the client may request a review. This can be done by contacting the original decision maker, either in person or via an advocate or legal representative. This request can be made verbally, via fax, email or post. The person reviewing the case will be senior to the original decision maker and not involved in making the original decision.

The reviewing officer will contact the customer or his/her representative to identify themselves as the reviewing officer and providing an outline of the process of review, including timescales for providing any further submissions and the date the review decision is due. The customer will be offered the opportunity to make oral representations if they wish. The review process must be completed within 8 weeks unless both parties agree to an extension. The reviewing officer will consider all the information before him/her and inform the customer of his/her findings in writing. The reviewer can uphold, quash or overturn the original decision. If the customer believes there is an error in law s/he may apply, within 21 days of receiving the decision, to the County Court for an appeal of the reviewing officers’ decision.