

# **Homelessness Strategy**

**Harrow**

**2013 – 2018 (extended to December 2019)**

## 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, and extending it to the end of 2019 in view of the implementation of the new [Homelessness Reduction Act 2017](#), this document details Harrow's response to the difficult housing choices, as well as the opportunities offered by recent housing legislation and welfare reform, that the Council has to make in meeting its homelessness duties. In particular, this document is central to delivering the Housing Strategy's overarching objective of **'Continue to tackle homelessness through prevention advice and support, improving access to and improving standards in the private rented sector.'**

Our aim is to make the best use of new and existing homelessness legislation to continue to address and reduce homelessness through a range of methods and to access suitable homelessness accommodation at the lowest cost.

3. Through this Homelessness Strategy, the Council is able to:

- Provide a strategic framework to deliver 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
- Set out a joined-up approach to addressing the challenges facing housing through companion strategies including the Private Sector Housing Strategy; tenancy strategy and the existing allocations scheme, all of which should be read in conjunction with this document.

4. Together, with the welfare reform agenda and changes to social housing allocation, lettings and management, discharging homelessness duty with a suitable offer of private rented sector (PRS) accommodation has changed the way that Harrow discharges its duty to households accepted as homeless since 9<sup>th</sup> November 2012.

5. As the full extent of the welfare reforms, particularly the overall benefit cap, Housing Benefit/Local Housing Allowance freeze, and the roll out of Universal Credit, suitable and economically realistic housing options outside of Harrow continue increasingly to 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. New housing legislation has been introduced in the form of the [Housing and Planning Act 2016](#) and the [Homelessness Reduction Act 2017](#). The [Housing White Paper](#) setting out the government's plans to reform the housing market and boost the supply of new homes in England was published on 7 February 2017. A Green Paper on social housing is expected in 2018.

Data from the [Local Authority Housing Statistics for 2016-2017](#) from the Ministry of Housing, Communities and Local Government and the [English Housing Survey 2016-2017](#) show that the number of homes owned by local authorities is declining, along with the number of council homes let to new tenants. This has a negative impact on people on housing waiting lists.

Overall the amount of social housing in England has reduced by about 270,000 units over the past 20 years. Since 1997, the number of homes owned by local authorities has more than halved, from just under 3.5 million 20 years ago. This is due to right to buy sales, large-scale voluntary transfers to housing associations and demolitions. Over the same period, the number of homes owned by housing associations rose from just under a million to more than 2.51 million. The size of the private rented sector has doubled since 2002 and accounts for about 4.7 million households (one in five). Of approximately 23.1 million households in England in 2016-17, 14.4 million (or 63%) were owner occupiers.

Total lettings by local authorities have fallen since the turn of the century and new tenants make up a smaller proportion of total lettings than previously. At the start of the century, councils were letting more than 300,000 homes per year but local authority landlords let 112,600 homes in England in 2016-17.

The gap between social and private rents is greater in London than in the rest of England. In 2016-17, the average private rent in London was £309 per week while tenants in social housing paid an average of £132 per week. Outside of London, the average private rent was £158 per week while tenants in social housing paid an average of £95 per week.

There were 1.16 million households on local authority waiting lists in England in April 2017, a reduction of 2% from the year earlier, though this may reflect the greater freedom to change waiting list criteria introduced by the [Localism Act 2011](#).

While some social housing is being built there is insufficient new housing to meet housing need in many areas. The 1% reduction in social rents every year for four years until 2019/2020 means that less money is available to build new homes or improve current housing stock.

### **Localism Act (part 7) and social housing reform**

7. Since the [Localism Act 2011](#) local authorities have been able to discharge their homelessness duties with an offer of suitable accommodation in the Private Rented Sector (PRS). The [Homelessness Reduction Act 2017](#) extends this option to all households facing homelessness.

8. Harrow continues to increasingly discharge into the PRS because of several factors. These include increasing levels of homelessness as welfare reforms impact on residents; a greater focus on homelessness prevention and relief; lower supply of new social housing due to funding; lower turnover of social housing; reductions and changes to rents in the social rented sector. By no longer automatically offering social housing tenancies Harrow ensures that the most economically realistic housing solution is offered to households in need.

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 Tenancy Strategy; Allocations Scheme; Private Sector Housing Strategy and Housing Strategy.

### **Welfare Reform Act 2012**

10. Changes to welfare benefits, particularly to Housing Benefit (HB), have already been implemented and further changes will take place over the next few years. The most significant changes have been:

- Reduction of [Local Housing Allowance \(LHA\)](#) from the 50th percentile to the 30th percentile rent levels in the PRS, and then frozen for four years. Maximum LHA capped at 4 bedrooomed accommodation.
- Reduction of the Benefit Cap in November 2016 to £23,000 per year (£442.31 per week) for a couple or a household with children in London or £15,410 per year (£296.35 per week) for a single person in London.
- The rollout of Universal Credit (UC) - to date in Harrow only Live Service UC has been rolled out to single people or couples without children. People moving to Harrow from an area where the Full Service UC has been rolled out continue to receive Full Service UC. Full Service is expected to be rolled out to Acton Job Centre Plus (covering claimants in UB5) on 28 March 2018, Hendon Job Centre Plus (covering claimants in NW9 and HA8) on 16 May 2018 and Harrow Job Centre Plus (covering claimants in HA1, HA2, HA3, HA5 and HA7) on 4 July 2018.

These changes are impacting on households in need and reliant on HB to find suitable PRS accommodation within Harrow. The changes by limiting the choice of affordable PRS homes for households in receipt of benefits may make it increasingly difficult for the council to find suitable homes in Harrow. As well as causing much accommodation to be unaffordable, local landlords are also reluctant to rent to benefit dependent households because of the perception that Universal Housing costs go to the tenant, and tenants on Universal Credit are more likely to be in arrears.

11. Other changes introduced under the Act include raising the age limit for Shared Accommodation Rate to 35; new limits on benefits for 18-21 year olds; increasing deductions for nondependent adults which could lead to increased rent arrears; localising Council Tax support, and reducing benefits for working age households living in social housing that is larger than their requirements (bedroom size criteria, commonly referred to as the Bedroom Tax).

### **Homelessness Legislation**

12. The Housing Act 1996, as amended by the [Homelessness Act \(2002\)](#), is the main piece of homelessness legislation and sets out the legal duties that all local authorities have towards people who are homeless. The [Homelessness Reduction Act 2017](#) introduces new requirements for Local Authorities. Appendices set out how the council will initially respond to these new duties.

## Regional

13. The housing crisis is the greatest challenge facing London today, and tackling it is one of the Mayor's biggest priorities. The Mayor has launched his [Draft London Housing Strategy](#). It sets out his plans to tackle the capital's housing crisis and to provide all Londoners with a decent and affordable home. The Housing Strategy will be published in 2018, following consideration of the responses received to this consultation.

The Draft London Housing Strategy contains a number of policies to ensure that homeless households receive adequate access to accommodation, as well as details of proposals to tackle rough sleeping.

The [No Second Night Out](#) initiative aims to prevent rough sleepers from sleeping out for more than one night and reconnects them 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 those objectives, as detailed in the table below:

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

15. Informal consultation on the various government housing policy changes began in summer 2011 with a series of events held across the borough to shape Harrow's

thinking. Formal consultation, via the Council’s website, ran from the 2nd of January 2013 – February 28th. Additional consultation took place in 2015 and in 2018 regarding changes to the Housing Allocation Scheme, the introduction of a Temporary Accommodation Allocation Policy and Procurement Strategy and the review of the Homelessness Strategy.

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

**Key information and facts on Housing and Homelessness**

17. Nationally, homelessness is increasing and levels of homelessness are predicted to increase as further reform to housing and welfare benefits, particularly the transition to Universal Credit, is completed.

18. The council’s housing evidence base supports the decision making for a range of housing strategies. Key information and trends on housing needs and homelessness from this evidence base show:

*Homelessness*

- There are up to 2,000 households on the housing register at any one time, with 2046 on the register in January 2018.
- There were over 300 families living in council provided Bed & Breakfast accommodation in June 2016, a significant increase in the use of emergency and temporary accommodation from single figures in 2011. This number had reduced to 114 by September 2017.
- Advice and information is given in more than 1750 cases each year.
- Prevention of homelessness in around 1000 cases annually
- Homelessness decisions made in recent years (number of cases):

2009/10	320
2010/11	335
2011/12	368
2012/2013	382
2013/2014	389
2014/2015	446
2015/2016	726
2016/2017	636

- Homelessness presentations, whilst affecting all communities, are higher from Black ethnic minority groups. National research has found the same.
- 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 but with the change to benefits for home owners (Support for Mortgage Interest) moving from a benefit to a loan, we expect homelessness will increase. Currently households falling out of work have a short term safety net to tide them over until they get back into suitable employment and become financially independent again. In future more households who experience financial problems

will now have to sell and leave the sector, becoming homeless, before their debts spiral out of control.

### *Welfare Reforms*

- 18,808 of all of Harrow's households receive housing benefit
- 12,892 of households receiving HB are of working age
- The benefit cap currently affects 276 households, as at December 2017.
- The bedroom size criteria currently affects 499 households, as at December 2017.
- Families with large numbers of children are the hardest hit by the benefits cap
- Further research on larger families indicates a significant shortfall between their benefit support and rents they currently pay
- There are 180 active claimants (at 05/02/2018) that are subject to the shared accommodation rate who are under 35 years of age.

### *Housing & supply*

Harrow has one of the lowest local authority (LA) housing stocks in London, with 4,836 properties at 31 March 2017, just 5% of all housing stock. One bedroom properties make up 37%, with around half of these being sheltered accommodation. 3% of Council stock is studio accommodation, two bedroom properties make up 30%, three bedroom properties make up 28%, and only 2% of properties have four or more bedrooms. 6 of the 94 new homes being built on estate 'infill' sites were completed and let in July 2017, and plans to regenerate an entire estate, Grange Farm, were submitted in Dec 2017.

In addition, there were 4,341 Registered Provider (RP) properties (previously called housing associations) in Harrow at March 2017, also 5% of all housing stock.

- Harrow has the smallest social housing stock in West London.
- Half of Harrow's council homes have been sold since the Right to Buy was introduced in 1979.
- Up to half of Right to Buy leaseholders do not live in the home they purchases, with many let out as private rented housing
- In 2016/2017 the Council let 74 council homes as permanent housing.
- Not all void council homes are available for permanent letting, as some are used as temporary accommodation pending estate regeneration.
- In 2016/2017 a total of 237 social housing lettings were made through Locata.

## **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**

The [Homelessness Reduction Act 2017](#) codifies much of the work we have always done, but regrettably introduces a new layer of administrative burden. Nothing in the act produces any new housing supply to reduce homelessness.

### **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 on the Council's website enabling service users to access information that is relevant, accurate and current.

#### **Prevention Services and support**

22. As demand for housing and homelessness services continue 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, including Xcite and Learn Harrow
- 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 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 pioneering 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 Private Sector Housing Strategy contain further details of other initiatives and schemes. For instance, preventative housing related 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 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 and outside of Harrow. Households wanting to remain in Harrow will need to increase their income to meet their housing costs. Housing Needs work in partnership with Xcite, the Council's employment service, to support residents in this area. 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 is now approximately twice the size of the social rented sector. Through a combination of government policy changes and pressures on social housing it is increasingly important as a source of accommodation for households in housing 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 support mean that while Harrow will seek suitable PRS accommodation in the Borough, it 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. Additionally, the Pan-London Agreement on Inter-Borough Accommodation Placements, may 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 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.

28. The Homelessness (Suitability of Accommodation) Order 2012 (as amended by the [Homelessness Reduction Act 2017](#)) lays the rules which local authorities must consider when discharging homelessness duties into the PRS. The Council assesses on a case by case basis 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 the statutory minimum period – the expectation is that most households can occupy the home for far longer as a permanent home.

29. Loss of a PRS tenancy is recorded as one of the main reasons for homeless acceptances at present. However, the Council prevents homelessness in the PRS through measures including negotiation or legal advocacy. Other assistance through the Help2Let scheme has either helped in accessing alternative PRS accommodation or maintained existing homes.

30. In recognition of these facts and in exercising its powers to discharge homelessness duties into the PRS and taking account of statutory guidance the policy attached at appendix X will support the decision making process.

### **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 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 enabling under occupying households to move to more suitably sized accommodation and free up larger properties, and an under-occupation officer has been encouraging more moves and registrations. Around

12 under-occupied properties per year have been made available through initiatives under this scheme, with 12 in 2016/2017 and 14 in the first three quarters of 2017/2018. The incentive scheme is reviewed regularly to ensure 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 also deprives a household with a genuine housing need of a social rented home. The Council successfully recovered 12 properties from fraudulent use in 2016/2017 and more than 12 are due to be recovered in 2017/2018. 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. We also help homeless households and those threatened with homelessness obtain social housing in other parts of the country through the HomeFinder scheme.

#### 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. We are improving our homeless hostel accommodation, Vernon Lodge. Whilst the Council met the government's target to reduce TA use by half in 2010, it has not been possible to maintain this level due to the impact of welfare reforms.

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

- Actions to reduce the use of short-term accommodation
  - Discharging or relieving homelessness into the PRS, (where this the suitable option)
  - Direct Leasing of PRS properties
  - Making decisions on homelessness applications within the recommended timeframe likely to be set out in the new Code of Guidance
- Actions to reduce the length of stay in temporary accommodation.
  - Explore housing options for nondependent adults living in larger households, in TA, helping them to find their own independent housing solution.
  - 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 not entitled to assistance under Homelessness duties or not able to buy a

suitable home on the open market may be entitled to support under the GLA's scheme. In Harrow, priority for the schemes is given to groups under the criteria set out in the Mayor's First Steps scheme. Details of the GLA's scheme can be found at [www.shareto-buy.com](http://www.shareto-buy.com)

### **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 or by improving their ability to access suitable and economically realistic housing either within or outside the borough. It is equally committed to supporting landlords to ensure services meet their needs, such as the need to improve the condition of their stock.

41. The support package offered to landlords, through the Council's trailblazing 'Help2Let' agency provides a range of services from tenant finding to full management services for landlords. The Council offers advice and assistance, floating support, quick lettings and better liaison with the Housing Benefits service to landlords working with the Help2let agency. The Council is looking to increase the number of Landlords it works with, as well as 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 preference for an enabling approach towards landlords allows households to remain in their PRS accommodation. Details of these schemes are contained in the Private Sector Housing Strategy. In addition, the Landlord Forums, hosted by the Council are important opportunities for consultation and engagement with landlords.

43. Where an enabling approach towards improving conditions does not work, then the council will also look at taking enforcement actions as a last resort. The Council's responsibilities to ensure that conditions within the PRS are of a suitable standard are detailed in the Private Sector Housing Strategy.

### **4. Affordability, money and debt advice**

44. Debt and financial exclusion is a common problem for homeless households or those approaching the Council's housing service. The current economic uncertainty 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 more pressure on the PRS which is driving homelessness approaches.

45. Through the Personalised Housing Plan, housing advisers will work with homeless applicants to identify how much households can afford to contribute to their housing costs from other income, as well as Housing Benefit.

46. Housing advisers give basic financial and budgeting advice to households either presenting or accepted as homeless. Money and debt advice is important to mitigate the risk of homelessness due to welfare reforms and the overall benefit caps.

Further details of the Council's work on providing assistance to gain employment and increase household income are contained in the Economic Development Strategy.

Where households are in employment, then they will be excluded from the Universal Credit caps.

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

48. 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 drug and alcohol misuse. By identifying support needs we can prevent homelessness through targeted and specialist support.

### **Mental Health**

49. The Council commissions floating support services to support vulnerable residents settle into and maintain their tenancies and homes. There are generic and specialist support services available. 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**

50. 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**

51. 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 Sleepers**

52. Historically, rough sleeper numbers in Harrow has been low and in the 2017 annual count of rough sleepers an estimated 10 rough sleepers were returned. This annual rough sleeping assessment in November showed no increase in rough sleeping but we acknowledge it continues to be challenging. However low numbers of visible rough sleepers may mask higher numbers of single non-priority 'sofa surfers' or hidden homeless.

53. 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 Trinity Church. They provide advice, practical assistance and referrals into hostels and other support services. More recently, the Ascension Trust has started operating a Harrow Street Pastors service aimed at assisting rough sleepers to break the cycle of rough sleeping.

## Partnership working

54. The Council works with partners across West London, through the [West London Alliance](#) and the [West London Housing Partnership](#) to provide a comprehensive set of services for rough sleepers and develop a West London Action Plan to end rough sleeping, including a number of joint initiatives. 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.

We work with West London Housing Partnership to run a Rough Sleeping Prevention Service.

55. The Council also works with [FirmFoundation](#), a local charity based in Harrow, to provide an annual winter weather shelter. It is funded by grants, churches, businesses and individuals. Rough sleepers are referred to the shelter by Harrow and other London Boroughs. The shelter has 15 bed spaces for male guests and 7 bed spaces for female guests, who are given a bed space for the night on a nightly basis. The shelter aims to provide safe dormitory style overnight accommodation, where residents are provided with food, washing facilities and advice and support. They are offered support in accessing local services such as a GP, Job Centre Plus and mental health care and where possible help to find long term accommodation. The winter night shelter also aims to provide access to appropriate accommodation for an additional 8 guests and to support for Drug and Alcohol recovery for 3 guests.

## Single Homeless Households

56. The Council supports 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.

57. 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 who do not have a statutory priority need, if financial support is made available by the MHCLG.

58. 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 in order 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

59 Housing Benefits age criteria restriction for those aged under 35 years can increase homelessness amongst single person households for whom living in shared housing is not appropriate.

## **Young People and those leaving care**

60. 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.

61. 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 Children's Services operate successfully under a protocol covering this.

62. Under the Council's revised Housing Allocation Scheme young people leaving care through approved move-on will be given high priority for social housing, with an annual quota of 1 bedroom and studio accommodation to be set.

63. 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 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**

64. 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**

65. 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**

66. 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 an increased risk of poorer health, fewer employment opportunities and lower educational attainment.

## **Improving employment and training opportunities**

67. In taking a holistic approach to tackling homelessness and encouraging customers to help themselves 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.

68. The Council, working in partnership with other agencies, is supporting out of work households to access employment and training initiatives. For example, section 106 agreements require partners to have training and apprenticeship agreements in place with the Council when delivering new housing. 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.

69. 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**

70. As public funding becomes increasingly scarce, efficiencies gained by working in partnership are likely to become more valuable in tackling homelessness. Working with the boroughs in the West London Housing Partnership will allow all options for joint working, sharing of good practice to be developed and enhanced. Of particular importance is the work to tackle rough sleeping and single homelessness.

### **Housing Associations**

71. 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**

72. 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**

73. The Voluntary and Community Sector (VCS) are important partners in providing homelessness and related services to assist the Council. For example the Single Homelessness Signposting Drop-In provided by the Single Homeless Forum at Trinity Church; advice by the CAB; assistance with the annual estimate of rough sleepers; and the work of the Harrow Street Pastors 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

74. We have used the outcomes from consultation and our Evidence Base to complete an Equalities Impact Assessment on this Homelessness Strategy which is available at [add link].

### Action Plan

75. 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.

76. 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
<b>Good quality housing advice and accessible prevention services</b>	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	
<b>Enable access to economically realistic housing</b>	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.

	<p>Promote the Help2let agency's work to increase the supply of PRS accommodation, including outside of Harrow and London, for homeless households.</p> <p>Explore developing further options to continue leasing properties from landlords through the Help2Let agency.</p> <p>Maximise the use of, national and Pan-London mobility schemes to enable homeless households in harrow access economically realistic housing.</p> <p>Continue to work with Registered Providers to provide new affordable housing in Harrow. To include home ownership products for low income households.</p> <p>Continue to maximise the proportion of Registered Provider nominations to ensure increased levels of lettings are available for Harrow.</p> <p>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 &amp; Breakfast hotels.</p> <p>Continue to make best use of the Discretionary Hardship Fund to support homeless households and those at risk of homelessness.</p>	
<b>Support Landlords and improve [conditions in] the PRS</b>	<p>Support the actions in the Private Sector Housing Strategy's Strategic Aim 2 – enable and enforce better housing conditions in the Private Sector</p> <p>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.</p>	<p>On-going throughout the life of the strategy. Annual review</p>
<b>Affordability, money and debt advice</b>	<p>Implement 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.</p> <p>Ensure early identification of money problems which may cause homelessness and work with partners to offer debt advice.</p> <p>Work with other partners and Council Services to assist households with advice on budgeting, deposits and arrears with rents.</p>	<p>On-going throughout the life of the strategy. Annual review</p>
<b>Address the needs of vulnerable households, including rough sleepers and single person</b>	<p>Continue to operate specialist housing advice surgeries for vulnerable people to maximise level of early intervention work</p> <p>Actively participate in the <a href="#">No Second Night Out</a> scheme to identify and address incidents of rough sleeping</p> <p>Ensure adequate cold weather provision and explore the potential to extend the winter shelter</p>	<p>On-going throughout the life of the strategy. Annual review</p>

<b>households.</b>	provision beyond just winter period	
	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	
<b>Working in partnership to make best use of fewer resources and best practice</b>	Monitoring the Homelessness Strategy action plan by the Housing Needs Senior Management Team.	On-going throughout the life of the strategy. Annual review
	Continue to work with the Single Homeless Forum to promote partnership working and prevent homelessness through advice and assistance	
	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.	

## **Appendix 1: Homeless Accommodation Selection Policy**

### **Homelessness Accommodation Selection Policy**

#### **1. Introduction**

The purpose of this Policy is to set out how the council will allocate accommodation to fulfil its obligations under Part VII Housing Act 1996 and the prevention and relief duties pursuant to the Homelessness Reduction Act 2017 (HRA 2017). This accommodation will generally be procured under the Homelessness Accommodation Procurement Strategy, and excludes offers of accommodation under Part VI Housing Act 1996, as amended, which are allocated in accordance with the council's Housing Allocation Scheme for Part VI Accommodation.

This Homelessness Accommodation Selection Policy supersedes the Temporary Accommodation Allocation Policy agreed at Cabinet in November 2015.

The council is committed to securing and offering suitable accommodation locally as far as is practically reasonable but this may not always be possible due to availability, size, affordability and conflicting priorities.

The lack of affordable housing and impact of the on-going welfare reforms mean that it is challenging to procure sufficient affordable accommodation locally and some households will need to move out of Harrow or out of London. This is more likely to affect larger families and those on low incomes or not in settled employment.

#### **2. Objectives**

The objectives of the Homelessness Accommodation Selection Policy are to:

- a) Ensure that accommodation is allocated in a manner that takes into account the needs of each member of the household
- b) Ensure that the allocation of accommodation safeguards the welfare of any children in the household
- c) Ensure that the allocation of accommodation complies with the Housing Act 1996, as amended by HRA 2017 and any subsequent regulations made by the Secretary of State, and the Children Act 2004. Manage the expectations of applicants and the agencies supporting them and indicate to them what factors will be taken into account when decisions are made.

#### **3. Responsibilities**

The responsibility for the implementation of the Homelessness Accommodation Selection Policy is held by the Head of Housing Needs.

#### **4. Regulatory/Legal framework**

The creation of a Homelessness Accommodation Selection Policy and a Homelessness Accommodation Procurement Strategy was strongly recommended by the Supreme Court in its judgement in *Nzolameso v City of Westminster* (2015).

This Policy takes into account the council's statutory obligations under the Housing Act 1996, as amended by the HRA 2017, and the Children Act 2004.

The council aims to procure and allocate accommodation that meets the standards set out in the Homelessness (Suitability of Accommodation) (England) Order 2012 as amended by the Homelessness Reduction Act 2017.

## **5. Policy**

### **5.1 Allocation of accommodation**

When allocating accommodation under this Policy:

- a) only available accommodation can be offered
- b) a bespoke procurement exercise will not normally be undertaken for each applicant
- c) offers will be made from the available accommodation supply that the council is generally able to procure (this excludes social housing that is allocated in line with the council's Housing Allocation Scheme for Part VI Accommodation)
- d) accommodation offered may be limited by the council's resources provided for meeting homelessness and housing need and by the practical difficulties of procurement.

The council aims to house families locally. When this is not possible because of insufficient supply of affordable accommodation locally, priority will be given as follows:

- a) Families who have a child or children with particular educational needs that can only be met locally at their existing school or college, such as a child who is in key stages of education in years 11 or 13 and due to take exams; or who have a Statement of Special Educational Needs (SEN) or Education Healthcare Plan (EHC Plan) that cannot be transferred or similar services obtained elsewhere; or who have other exceptional educational needs;
- b) Families where one or more family members are in employment and similar employment is not available in another area where they could be accommodated or who could not commute within a reasonable time and at an affordable cost to their existing employment from another area where they could be accommodated;

- c) Families where one or more family members have exceptional medical needs and are in receipt of a significant care package or specialist healthcare that cannot be obtained or transferred elsewhere;
- d) Families who have other special reasons to stay locally and are unable to travel back to the area as reasonably needed, such as significant care, welfare or social needs that require the family to remain in the area.

In line with the Children Act 2004 the needs of the children are considered. Generally, even if accommodation is located in a different area, if it is suitably sized self-contained affordable accommodation it will meet the needs of a child better than smaller accommodation that requires the family to make extra payments from their resources.

Offers of available self-contained accommodation (as identified in the Homelessness Accommodation Procurement Strategy) will be made to those homeless applicants with dependent children, and/or with a member of the household who is vulnerable, who are owed the prevention or relief duty; or are owed s.193 homelessness duty. Accommodation offered will mainly be of an assured shorthold tenancy in the private rented sector.

Unless there is a compelling reason to prioritise another applicant, this will usually be the order of priority for those who are unlikely to be able to source their own accommodation:

- 1) Those who have waited longest in shared B&B accommodation and would likely be assessed as unintentionally homeless
- 2) Those who will shortly become homeless, would need to be offered s188 accommodation, and would likely be assessed as unintentionally homeless
- 3) Those who have been accommodated under s193 duty and will shortly become unintentionally homeless from that accommodation
- 4) Those who need to move because their current s193 accommodation is unsuitable
- 5) Other families in s193 accommodation in order to end their homelessness and the homelessness duty
- 6) Other families in s193 accommodation to make best use of the limited supply of accommodation that we have.
- 7) Other applicants to whom the council has a duty to offer accommodation; and if supply and resources allow, accommodation may be offered to homeless applicants where an accommodation duty does not exist.

Offers of private rented accommodation will usually be made as a final offer during the relief or s193 duty.

Some assistance may also be given to families to secure accommodation they have found for themselves and that they can afford (subject to it being suitable and at a reasonable cost) in order to prevent homelessness, or to move out of shared housing, or end the homelessness duty.

Private Rented Sector Offers (PRSO under the Localism Act 2011) will be made to post 9th November 2012 homeless applicants accepted for s193 duty, depending upon what affordable accommodation is available. This ends the homelessness duty. Whilst there is such a low supply of social housing in Harrow it is likely that most post 9th November 2012 homeless applicants, to whom we owe the s193 statutory homeless duty, will eventually have that duty ended by a PRSO.

Even if local accommodation is available on a particular day, a family who does not have a high priority to remain locally may be offered accommodation out of the district, if it is likely that another family with a more urgent need to remain is likely to need that accommodation in the very near future (i.e. within a few days).

## 5.2 Size of accommodation

The accommodation offered may be required to be occupied up to maximum capacity in line with Part X of the Housing Act 1985 and so may not have a separate living room.

## 5.3 Offer of accommodation

Accommodation will normally be offered for immediate occupation, and so there may not be an opportunity to view. Assistance may be provided with travel and resettlement, if needed.

## 5.4 Right to review

The suitability of accommodation offered can be reviewed if the applicant believes it is unsuitable. The request must be made within 21 days of being offered the accommodation. It is always recommended that the applicant moves into the accommodation and asks for a review once they are occupying it.

If an applicant refuses to accept a property that has been offered as a final offer under relief or s193 duty, once they have been warned of the consequence, this will usually result in homelessness duties ending and any current accommodation may be terminated. If the property offered is determined upon review, or by a decision of the court, not to be suitable then the homeless duty will be reinstated. The decision to end the homelessness duty can also be reviewed, if requested within 21 days of the decision.

## 5.5 Exceptions to this policy

In exceptional circumstances accommodation may be offered outside of the Homelessness Accommodation Selection Policy so that the council does not fetter its discretion and to make best use of the affordable accommodation that is available. Decisions on this will be made by one of following: Head of Housing Needs, Housing Needs Operations Manager, Senior Housing Needs Team Managers. The usual right to a review for decisions relating to homeless duties will apply.

## **6. Equality and diversity**

The EqIA for the Homelessness Strategy incorporating this Homelessness Accommodation Selection Policy was presented to and approved by the Chair of the Community DETG on 5 March 2018.

## **7. Staff training**

The responsibility for training staff on the Homelessness Accommodation Selection Policy is held by the Head of Housing Needs.

## **8. Publicity**

The Homelessness Accommodation Selection Policy will be made available publicly.

## **9. Review**

A review of this policy will take place in 5 years, or earlier should there be a significant change to the homelessness pressures in Harrow.



## **Appendix 2: Homelessness Accommodation Procurement Strategy**

### **Homelessness Accommodation Procurement Strategy**

#### **1. Introduction**

The purpose of the Homelessness Accommodation Procurement Strategy is to set out how the council will procure sufficient units of self-contained accommodation to meet the anticipated demand for accommodation required to meet homelessness duties under Part VII Housing Act 1996 as amended by Homelessness Reduction Act 2017 (HRA 2017). This strategy excludes social housing tenancies let under Part VI Housing Act 1996 which are covered under the council's Housing Allocation Scheme.

The lack of affordable housing and impact of the on-going welfare reforms mean that it is unlikely that sufficient local accommodation can be acquired and so some households will need to move out of Harrow or out of London.

#### **2. Objectives**

The objectives of the Homelessness Accommodation Procurement Strategy are to:

- a) Ensure that there is a sufficient supply of accommodation for the council to meet its statutory homelessness duties
- b) Ensure that there is sufficient supply of accommodation for the council to prevent or relieve homelessness; or discharge homelessness duties for households:
  - (i) with dependent children, and/or
  - (ii) with a vulnerable member of the household and/or
  - (ii) in priority need, or likely to be in priority need
- c) Procure the required amount of homelessness accommodation within the allocated budget
- d) Reduce the council's dependence on emergency and short term accommodation.
- e) Minimise the impact on rent levels of paying incentives and other payments used in the procurement of accommodation on the local housing market (or any housing market outside of the local area) so as not to price other local families out of accommodation in an area.
- f) Comply with the Inter Borough Accommodation Agreement (IBAA)
- g) Manage the expectations of applicants and the agencies supporting them and indicate to them what factors will be taken into account when decisions are made. To be able to include appropriate information and guidance in an applicant's Personalised Housing Plan on the likely availability of accommodation.

#### **3. Responsibilities**

The responsibility for the implementation of the Homelessness Accommodation Procurement Strategy is held by the Head of Housing Needs.

#### **4. Regulatory/Legal framework**

The council was strongly recommended to have a Homelessness Accommodation Procurement Strategy and a Homelessness Accommodation Selection Policy in the Supreme Court judgement of Nzolameso v City of Westminster (2015).

The Homelessness Accommodation Procurement Strategy takes into account the council's statutory obligations under the Housing Act 1996 (as amended by the Homelessness Reduction Act 2017) and the Children Act 2004.

The council will aim to procure accommodation that meets the standards set out in the Homelessness (Suitability of Accommodation) (England) Order 2012 (as amended by the Homelessness Reduction Act 2017).

## 5. Strategy

### 5.1 Forecast of demand

The forecast of demand is based on a range of data including homelessness acceptances in previous years, the current rate of acceptances, the predicted rate of acceptances in the future, homelessness prevention figures and the number of families in emergency temporary accommodation who require alternative accommodation.

The council aims to procure a minimum of 650 units of accommodation for use as self-contained longer term or permanent accommodation over each of the years 2018-19; 2019-20; and 2020-21.

### 5.2 Procurement Plan

The targets for the procurement of different types of accommodation are as follows:

<b>Accommodation</b>	<b>Number of units</b>	<b>Local</b>
Private Sector Leasing (PSL) Housing Association Leasing (HALS) and Private Rented properties (on Assured Shorthold Tenancy) managed by the council Total net increase	150	Y
Nominations to Assured Shorthold Tenancies (managed by landlord)	65	Y
Nominations to Assured Shorthold Tenancies (outside of local area e.g. Home Counties and Midlands)	100	N
Harrow Council Housing used as Homelessness Accommodation (non-secure tenancy)	50	Y
Securing tenancies for households who have identified their own accommodation	215	Estimate 75% local, but applicant's choice

Purchasing properties for use as temporary accommodation (local)	35*	Y
Social Housing outside London (HomeFinder)	35	N

\*pending approval of funding

These targets are subject to refinement as the market changes.

Other options may be developed such as quick build or pop up homes which could be used to reduce the number of families in short term accommodation.

### 5.3 Inter Borough Accommodation Agreement (IBAA)

It can be difficult to procure accommodation in other areas of London due to the Inter Borough Accommodation Agreement (IBAA), a pan-London agreement between all London Councils not to pay more for accommodation than the borough where the accommodation is located. This agreement can limit the council's ability to procure accommodation in London, meaning that the accommodation that the council is able to procure is more likely to be local or outside of London and/or the M25.

### 5.4 Accommodation standards

We aim to procure temporary accommodation that we believe meets the standards set out in the Homelessness Reduction Act 2017:

- a) in reasonable physical condition
- b) any electrical equipment supplied with the accommodation meet the requirements of the Electrical Equipment (Safety) Regulations 1994
- c) reasonable fire safety precautions have been taken with the accommodation and any furnishings supplied with it
- d) reasonable precautions have been taken to prevent the possibility of carbon monoxide poisoning in the accommodation
- e) the landlord is a fit and proper person to act in the capacity of landlord
- f) a valid energy performance certificate is supplied as required by the Energy Performance of Buildings (Certificates and Inspections) (England and Wales) Regulations 2007 (and from April 2018 is category A-E)
- g) a current gas safety record is supplied in accordance with regulation 36 of the Gas Safety (Installation and Use) Regulations 1998
- h) an adequate written tenancy agreement is supplied
- i) relevant licenses have been obtained if the accommodation is subject to licensing i.e. mandatory HMO license, additional HMO license or selective license.

Where accommodation is managed by a private landlord or agent, we will encourage the landlord to join an approved accreditation scheme, if they are not already accredited.

### 5.5 Emergency Accommodation

This procurement strategy does not cover emergency accommodation, which is also procured by the council. Emergency accommodation is often 'spot purchased', as and when it is needed and at short notice. If the council is unable to obtain emergency accommodation locally then it will be procured anywhere that it is available.

### 5.6 Future targets

Future targets for procurement and changes to the types of Temporary Accommodation or methods of procurement will be agreed by the Director of Housing and Portfolio Holder for Housing.

## **6. Equality and diversity**

The Equality Impact Assessment (EqIA) for the Homelessness Accommodation Procurement Strategy was presented to and approved by the Chair of the Community DETG on 5 March 2018.

## **7. Staff training**

The responsibility for training staff on the Homelessness Accommodation Procurement Strategy is held by the Head of Housing Needs.

## **8. Publicity**

The Homelessness Accommodation Procurement Strategy will be made available publicly.

## **9. Review**

A periodic review of the strategy will be conducted by the Director of Housing and the Housing Portfolio Holder; at least every three years.

## Appendix 3: Prevention or Relief Assistance Policy

### Prevention or Relief Assistance Policy

#### 1. Introduction

The purpose of this Policy is to set out how the council will assist different categories of applicants owed the Prevention and/or Relief Duty under Homelessness Reduction Act 2017 (HRA 2017). Those duties only apply if the council is satisfied that the applicant is homeless or threatened with homelessness within 56 days and eligible for assistance. The HRA 2017 requires that the authority must **take reasonable steps** to help the applicant to secure that accommodation does not cease to be available for their occupation or **take reasonable steps** to help the applicant secure accommodation for their occupation that is likely to be available for at least 6 months.

These duties and the council's obligation to assess an applicant's case and develop a Personalised Housing Plan are set out in sections 189A, 189B and 195 of the Housing Act 1996, as amended by the HRA 2017.

The council is committed to assisting applicants who are homeless or threatened with homelessness to secure for themselves a suitable housing solution. To this end, some assistance may be offered, but this will be subject to limitations of the housing market and resources that are available for homelessness services.

The assistance offered will be considered on a case by case basis outlined in the applicant's Personalised Housing Plan, and updated from time to time. This policy reflects our duties under the Children Act 2004 and the public sector equality duty under s.149 of the Equality Act 2010.

A financial assessment will be undertaken for each applicant, and they will be expected to prioritise payments so they can contribute available resources to any initial and on-going housing costs. Housing costs are required to be treated as a priority payment (along with other priority payments such as Council Tax, Fuel Bills etc.).

Any Discretionary Housing Payment available along with other available resources that could be claimed will be taken into account when deciding what help we may offer. We will not fetter our discretion.

Assistance will usually be conditional upon the applicant cooperating and fulfilling the steps they are required to undertake to prevent or relieve their homelessness.

#### 2. Assistance during the Prevention Duty

A range of methods may be used to help applicants depending on their Personalised Housing Plan, individual circumstances and needs.

Help that may be available for families with dependent children:

- In some circumstances limited rent top up if the accommodation is or will become affordable for the applicant without further extraordinary financial assistance
- Negotiations with landlord
- Assistance to resolve disrepair/other issues, working with the landlord

- Discussions/negotiations with family or friends who might be able to extend/provide accommodation- in some circumstances single payment to friend or family to secure continuing accommodation for a reasonable period, without which the accommodation would not be available
- Mediation
- Employment advice or assistance
- Budgeting advice
- Help to maintain existing or secure alternative accommodation.

Help that may be available to a single vulnerable applicant or family without dependent children with a vulnerable family member:

- In some circumstances limited rent top up if the accommodation is or will become affordable for the applicant without further extraordinary financial assistance
- Negotiation with landlord
- Assistance to resolve disrepair/other issues, working with the landlord
- Discussions/negotiations with family or friends who might be able to extend/provide accommodation- in some circumstances single payment to friend or family to secure continuing accommodation for a reasonable period, without which the accommodation would not be available
- Mediation
- Employment advice or assistance
- Budgeting advice.

Help that may be available to single non-vulnerable applicant or family without dependent children:

- Negotiation with landlord
- Attempt to resolve repairs/other issues
- Discussion/negotiation with friend or family
- Employment advice
- Budgeting advice.

### **3. Assistance during the Relief Duty**

Help that may be available for families with dependent children:

- Contribution towards deposit, rent in advance & Admin fees, if appropriate
- Negotiations with prospective landlords
- Information, advice and training session on the Private Rented Sector (PRS) and obtaining accommodation
- Possible payment to friend or family who can provide housing for a while
- Emergency accommodation. S188
- Resettlement support, if needed
- Possible offer of AST or other longer term private sector housing
- Employment advice or assistance
- Budgeting advice.

Help that may be available to a single vulnerable applicant or family without dependent children with a vulnerable family member:

- Contribution towards deposit, rent in advance & Admin fees, if appropriate

- Negotiation with prospective landlords
- Information, advice and training session on the Private Rented Sector (PRS) and obtaining accommodation
- Possible payment to friend or family who can house for a while
- Emergency accommodation. S188
- Resettlement support, if needed
- Possible offer of AST or other longer term private sector housing- may be shared accommodation
- Possible sheltered social housing, if appropriate
- Employment advice or assistance
- Budgeting advice.

Help that may be available to single non-vulnerable applicant or family without dependent children:

- Voucher, subject to resources- currently £150 payable to a landlord who provides the applicant with a suitable tenancy
- Discussion/negotiation with friend or family who may be able to accommodate
- Employment advice
- Information, advice and training session on the Private Rented Sector (PRS) and obtaining accommodation
- Possible room in shared housing if street homeless, but unlikely to be local.

#### **4. Responsibility & Training**

The responsibility for the implementation and training on this Policy is held by the Head of Housing Needs.

#### **5. Regulatory/Legal framework**

The creation of this Policy is in consequence of the Homelessness Reduction Act 2017 which commences on 3rd April 2018.

#### **6. Right to review**

There is a right to review the reasonable steps offered by the local council under s.202 of the Housing Act 1996 as amended by the Homelessness Reduction Act 2017.

#### **7 Exceptions to this policy**

In exceptional circumstances assistance may be offered outside of this Policy so that the council does not fetter its discretion. Decisions on this will be made by one of following: Head of Housing Needs, Housing Needs Operations Manager, or Senior Housing Needs Team Managers. The usual right to a review for decisions relating to homeless duties will apply.

#### **8. Equality and diversity**

The EqIA for the Homelessness Strategy, incorporating the new appendices, was approved by the chair of the Community Directorate Equality Task Group on 5 March 2018.

## **9. Publicity**

This Policy will be made available publicly.

## **10. Review**

A review of this policy will take place in by the end of 2019.



## **Appendix 4: Statutory duties**

### **Housing Act 1996 Part 7**

Current duties (at March 2018)

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 cannot 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.

**The [Homelessness Reduction Act 2017](#) amends the duties under Housing Act 1996, and comes into force from 3<sup>rd</sup> April 2018. This is a summary of the main changes and is not a definitive explanation of the Act.**

Current Duties: Housing Act 1996 (as amended by the <a href="#">Homelessness Act (2002)</a> )	New or amended duties: <a href="#">Homelessness Reduction Act 2017</a>
A duty to help someone who is homeless or threatened with homelessness within 28 days. A duty to prevent homelessness for people considered to be in priority need	A duty to help someone who is homeless or threatened with homelessness within 56 days. A new duty to assist an applicant in preventing or relieving their homelessness for all eligible applicants threatened with homelessness within 56 days, regardless of priority need
No current duty	A new duty on public services to notify a local authority if they come into contact with someone they think may be homeless or at risk of becoming homeless. This is

	unlikely to come into effect until October 2018.
Duty to secure that advice and information about homelessness and prevention of homelessness is available free of charge to any person in the district	Duty to provide or secure the provision of a service, available free of charge to any person in the authority's district, providing information and advice on preventing homelessness, and/or securing accommodation when homeless
General duty to provide advice and assistance	Duty to assess all eligible applicants' circumstances and agree or produce a personalised housing plan. This will include any steps the applicant is required to take in order to secure or retain accommodation and the assistance the council can offer. The plan should be kept under review until the council has decided a duty is no longer owed
Duty to provide interim accommodation where a person is eligible, homeless and in priority need, whilst assessment of duties owed is undertaken.	<p>Duty to provide interim accommodation where a person is eligible, homeless and in priority need, whilst assessment of duties owed is undertaken and during the relief duty.</p> <p>Relief duty: The authority must take reasonable steps to help all eligible applicants to secure for themselves suitable accommodation available for at least six months.</p>
Rights to review on decisions	Right to review on existing decisions and some review rights on new duties