



## **Report for: Cabinet**

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<b>Date of Meeting:</b>	11 November 2020
<b>Subject:</b>	Joining Capital Letters (London) Ltd
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Nick Powell, Divisional Director of Housing
<b>Portfolio Holder:</b>	Councillor Phillip O'Dell, Portfolio Holder for Housing
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	Appendix 1 – Capital Letters' Articles of Association Appendix 2 – Members Agreement Appendix 3 – Service Level Agreement Appendix 4 – Capital Letters Procurement Allocations Policy Principles

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

- 1.1. This report sets out the reasons for joining the Pan London Capital Letters (London) Ltd, which will collaboratively procure new properties on behalf of London boroughs, supported by the Ministry of Housing, Communities & Local Government (MHCLG).

### **Recommendations:**

Cabinet is requested to:

1. To approve the decision to join Capital Letters (London) Ltd.
2. To allow the appropriate staffing cost to be transferred to enable Capital Letters to recruit directly.
3. To note Capital Letters' governance structures including the Borough Representative Body on which all boroughs are represented.

### **Reason: (For recommendations)**

- 1.2. This initiative is required to deliver additional affordable, suitable private sector accommodation to allow the Council to meet its homelessness duties at a cost it can sustain against the background of:
- A challenging market with limited availability of accommodation for households on low incomes.
  - The likelihood of increasing number of homeless households next year, following the cessation of the ban on evictions and once the extended Section 21 notice period expires.
  - A shift in emphasis in homelessness policy towards use of resources to prevention.
  - The importance of working closely with other London boroughs to collaborate to secure accommodation.
- 1.3. The Capital Letters' governance process requires the third wave of boroughs to secure internal approval to join the company so the Borough Representative Body can confirm their membership. However, the actual date of implementation will be designed to suit London Borough of Harrow's internal timescales and operational arrangements.
- 1.4. The main financial benefit of joining the company is to access MHCLG funding and increase the number of private sector properties sourced in order to reduce the need for Temporary Accommodation.

- 1.5. The majority of properties that is procured through Capital Letters will be used to prevent homelessness or to end the homelessness duty through an offer of a private sector tenancy.
- 1.6. Properties are allocated to the participant boroughs in proportion to the staff resources they contribute. The Council proposes to fund 2 new posts within Capital Letters using the Flexible Homelessness Support Grant (FHSG) by transferring funds on an annual basis to Capital Letters for the company to directly recruit for the duration of the scheme. For the first year, it will cost up to £102k which will cover the cost of the salary and all on-costs/overheads.

## **Section 2 – Report**

### **Introductory paragraph**

- 1.7. Capital Letters is a not-for-profit organisation established in December 2018 by London boroughs to reduce the costs of temporary accommodation and deliver improved outcomes for homeless families, by jointly procuring and managing accommodation across London.
- 1.8. Capital Letters is being supported by MHCLG using £38m of top sliced Flexible Homelessness Support Grant (FHSG), to alleviate the costs to boroughs of providing accommodation and to encourage greater efficiency. The funding provides extra staffing, I.T. and other resources to increase supply and improve the service offered to both tenants and landlords. It is also used to subsidise the cost to boroughs for newly procured properties.
- 1.9. The Company is therefore funded by a combination of MHCLG grant, rents from tenants and top up payments from member local authorities. These are the payments that are already made by local authorities to ensure households are charged rents that are affordable to households who rely on benefits. These payments will be lower for local authorities as a result of the MHCLG subsidy.
- 1.10. By removing unhelpful competition and duplication of effort, and by providing an organisation to represent a large group of London boroughs, Capital Letters offers a simpler and more straightforward interface for landlords, managing agents and developers anywhere in London who are able to provide properties for families and other households most in need of accommodation.
- 1.11. Capital Letters will grow in phases, with an initial 13 boroughs joining in 2019, followed by 4 boroughs joining a year later in April 2020. The company is now securing members for phase three membership which London Borough of Harrow will be part of, if the recommendation is approved. There are plans to eventually include, if not all, then the majority of London boroughs.

- 1.12. Capital Letters is currently wholly owned by 17 London Boroughs - Barking & Dagenham, Bexley, Brent, Camden, Croydon, Ealing, Enfield, Hackney, Hammersmith & Fulham, Haringey, Lewisham, Newham, Redbridge, Southwark, Tower Hamlets, Waltham Forest and Westminster.
- 1.13. The governance arrangements of the company are set out in the Articles of Association of the company and Members Agreement (attached as appendices). Each member has the right to appoint a representative who attends and votes at member meetings on behalf of the member. Critical matters are reserved to the Members and this is set out in the Members Agreement. It will be noted from the Articles that should the Council wish to cease to be a member of Capital Letters, it may do so by serving no less than six months' notice in writing.

### **Options considered**

#### **Not to join Capital Letters (London) Ltd**

- 1.14. There is the option not to join the company in the third phase. This would result in a lost opportunity to access MHCLG grant funding and thus alleviate the costs of providing accommodation, to increase the procurement of accommodation and move away from expensive nightly paid temporary accommodation and to enable the placement of households closer to Harrow.
- 1.15. Boroughs who do not join Capital Letters will still have properties procured by Capital Letters in their area. Although Capital Letters abides by the agreed Inter Borough Accommodation Agreement (IBAA) rates, there is nevertheless a significant risk that landlords and agents will prefer to work with Capital Letters than within individual boroughs because of the profile it has, and because of the more streamlined ability to let properties across London with one organisation than with a number of different boroughs.

## **2. Background**

- 2.1. Tackling homelessness is a key priority at all levels, locally, sub-regionally, regionally and nationally.
- 2.2. 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).

- 2.3. 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 has been available to build new homes or improve current social housing stock.
- 2.4. Harrow has a small social housing stock with a high demand for housing from homeless households, home seekers on the housing waiting list and tenants waiting to move to alternative social housing. Few council homes become available every year, even taking into account our council house building programme. Nearly half of Harrow's council stock have been sold under the Right to Buy (RTB) since 1980.
- 2.5. There is a heavy reliance on the private rented sector in Harrow for both temporary and permanent housing solutions and affordability is a key challenge in Harrow. The Local Housing Allowance (LHA) rates are the maximum amount of Housing Benefit that can be claimed by tenants who rent from a private landlord. Some claimants need to apply for the housing element of Universal Credit instead. Many private rents in Harrow are above the LHA rates and tenants must make up the shortfall from their other income.
- 2.6. Waiting for an offer of social housing in Harrow is not a realistic option. We are likely to end our homelessness duty with an offer of a permanent housing solution in the private rented sector. Despite all efforts to secure more properties in Harrow, families often have to be housed elsewhere, where housing is more affordable.
- 2.7. Joining Capital Letters would enable London Borough of Harrow to secure more private rented properties in London within or close to the borough, thus reducing the need to place families in Bed & Breakfast and nightly paid emergency accommodation, in more distant parts of London or outside London. It would be better to secure these benefits sooner rather than later.
- 2.8. Member boroughs also have the option (if they choose to do so later) of transferring some or all of their existing private sector leased properties into Capital Letters, which as a private landlord is eligible for 100% Local Housing Allowance (LHA) from the Department of Work and Pensions, which is higher than the rate for borough-let temporary accommodation, which is currently 90% of 2011 LHA levels.
- 2.9. When a member transfers their existing private sector leased properties, a detailed exercise is undertaken to understand the risks and costs. Capital Letters is currently in the process of testing this out with London Borough of Bexley and London Borough of Ealing.

## **Current situation**

- 2.10. When a household approaches the Council in housing need, the Housing Needs team makes a formal assessment against a number of criteria as prescribed in homelessness legislation. If it is not possible to prevent homelessness, and the household has met the legislative criteria, there is a statutory duty to secure suitable accommodation for the household.
- 2.11. The demand for affordable housing in Harrow continues to be one of the major challenges that the council faces with high demand being primarily driven by households being evicted from the Private Rented Sector (PRS) due to affordability. Since the implementation in April 2018 of the Homelessness Reduction Act 2017, there has been an increase in the number of homelessness presentations. The growing number of applications and our obligations within the legislation means that we have to explore ways of increasing the number of properties available to us to discharge our duties to homeless households.
- 2.12. Due to the lack of supply of social housing the Council is using the power to meet new demand from homeless households with accommodation in the Private Rented Sector (PRS). Because there is an insufficient supply of PRS accommodation that is affordable in Harrow. Some homeless households are therefore still placed in temporary accommodation, or in PRS accommodation outside of Harrow.
- 2.13. Different types of temporary accommodation are used in Harrow to house homeless households including bed and breakfast accommodation (B&B), homeless hostels, private sector leasing (PSL), council stock, Housing Association leasing scheme (HALS), and homes acquired by the council for use as temporary accommodation.
- 2.14. There are currently c. 3200 households on the housing register, waiting for social housing in Harrow. Of these, c. 1200 homeless households are living in temporary accommodation at the end of September 2020. The council is therefore implementing various initiatives including building new council homes, purchasing homes and leasing private rented properties for use as temporary accommodation.
- 2.15. But as long as there is such a mismatch between the demand and supply of social housing, we also need to take steps to ensure the supply of suitable, affordable private rented accommodation.
- 2.16. Capital Letters will sit alongside these initiatives and focus on the procurement of private rented sector offer (PRSO) properties in or nearer to Harrow, for the prevention and relief of homelessness and to end a main homelessness duty.
- 2.17. This means that Capital Letters will complement rather than be in competition with existing Council initiatives, as the majority of procurement will continue to be handled in-house after joining Capital Letters. Of the c. 1200 households in temporary accommodation at the end of September 2020, 24% are accommodated using emergency accommodation nightly paid agreements or

properties outside the London area, which fall outside the scope of Capital Letters.

## **Why a change is needed**

### Demand and supply

- 2.18. There is a desperate shortage of housing which is affordable to Harrow's population. This initiative increases supply for a number of households in need of help and the costs the council incurs in supporting them.
- 2.19. Homeless households are spending an increasingly long period of time in Temporary Accommodation waiting for social housing. Depending on the size of the property required, some of these waits can be lengthy.
- 2.20. Recently, the housing pressures on low income households in London have perhaps never been higher as a result of COVID-19, with the work on the rough sleeping initiative. In addition, there is an anticipated increase in homelessness next year now that the ban on evictions is removed, the extended Section 21 notice period expiring, the furlough scheme ending, and redundancies increasing.
- 2.21. Due to this high level of demand for affordable accommodation, the significant financial impact and its likely continuation, even more than before a more co-ordinated effort is required from Councils across London to source an improved supply of suitable accommodation to meet demand.
- 2.22. Capital Letters is one of the initiatives which will help to increase the supply of private rented accommodation, reduce the cost of this accommodation, and reduce the need for households to be accommodated out of the borough. This pan-London initiative should achieve economies of scale and reduce the competition between boroughs for this type of accommodation.
- 2.23. Whilst the grant for incentive payments per property reduces over the funding period, because the operational arrangements are all in place, London Borough of Harrow will benefit significantly from the numbers of properties to be procured by Capital Letters, thus reducing homelessness costs. Additionally, the procurement of private rented sector properties offers the opportunity to discharge housing duty.
- 2.24. The activity of the company is being supported by a digital Property Listing Platform (PLP). The system is operational and allocating properties to existing member boroughs.

### Financial information and the service offer

- 2.25. The main financial benefit of joining the company is to access MHCLG funding and increase the number of properties sourced to reduce the need for High Cost Temporary Accommodation, thereby saving money in the General Fund.
- 2.26. Capital Letters is supported by a grant from MHCLG, allocated from the 'Flexible Homelessness Support Grant'. £38 million was initially allocated until 2021-22 and spread over 4 years. The business case submitted to MHCLG, if approved, will extend the grant period until 2023/24, providing an additional 2 years for Capital Letters to provide services and grant for members. Capital Letters await a formal response from the Ministry on the proposal.

<b>Year</b>	<b>Funding</b>
2018-19	£1.1 million
2019-20	£ 7 million
2020-21	£12.9 million
2021-22	£16.8 million
Total	£37.8 million

- 2.27. The grant from MHCLG is used to support three key areas of activity:
- (a) Grant for member boroughs to contribute towards the cost of private rented sector (PRS) placement incentives for landlords – £750 in 2021/22 per property procured by Capital Letters for a 2-year Assured Shorthold Tenancy. It is common for councils to offer an incentive payment for new landlords. In Harrow, incentive payments can range from £1,000 to £3,000 depending on the bedroom size and type of property. Each property procured by Capital Letters and let by the Council will attract a grant payment to top slice the cost of landlord incentive payments which will also assist in reducing the costs of homelessness provision.
  - (b) Grant for member boroughs to contribute towards top up payments made to landlords for Private Sector Lease (PSL) properties – currently £15 per week for each 3-year lease procured by Capital Letters. There is often a shortfall between the cost of leasing a property and the amount that can be claimed back through Housing Benefit.
  - (c) Central costs to enable the company to operate including corporate service staffing costs (Executive Team, HR, Finance etc) and for additional procurement staff (to increase property procurement), tenancy sustainment staff, IT and premises.
- 2.28. The Council proposes to fund 2 new posts within Capital Letters using the Flexible Homelessness Support Grant (FHSG) by transferring funds on an annual basis to Capital Letters for the company to directly recruit to these posts for the duration of the scheme. For the first year up to £102k to be



transferred to cover the cost of the salary and all on-costs/overheads. Capital Letters increase salaries in April each year based on the rate approved by the Board.

- 2.29. The new staff will be directly employed by Capital Letters on their terms and conditions.
- 2.30. This cost will be offset by reductions in the costs of procurement which benefit from the MHCLG top-sliced grant contribution available to Capital Letters. The current in-house Procurement Team which consists of 1 Team Manager (whose responsibility is split between procurement and management of the properties) and 3 Procurement Officers will continue to procure much needed private sector lease temporary accommodation, emergency accommodation and some private rented sector offer (PRSO) properties where an existing landlord that they already work with prefer the scheme. They will also continue to facilitate the relationship between landlords and homeless households who find their own private rented accommodation as a housing solution.
- 2.31. Over the last three financial years, the in-house Procurement Team secured the following number of total private rented sector offers (PRSO) which was used for the prevention and relief of homelessness and to end a main homelessness duty:
- |                 |    |
|-----------------|----|
| 2018/19         | 31 |
| 2019/20         | 56 |
| 2020/21 to date | 26 |
- 2.32. Capital Letters is no longer a leap of faith but a proof of concept. The first phase boroughs have worked closely with the Capital Letters team to obtain agreement on key documents such as Service Level Agreement and incentive packages, and to develop working processes and procedures. As a result, Capital Letters is fully operational, with all processes and procedures in place and a functioning IT system which means the third phase boroughs will benefit from the opportunity immediately on joining.
- 2.33. It is expected that the Council will benefit from approximately 200 placements - the target for each Housing Negotiator is 100 properties per year, although this is pro rata depending on when they commence employment with Capital Letters.
- 2.34. Therefore, membership of Capital Letters will enable Harrow to secure more PRS properties than historically procured. In addition, these properties will be within or close to Harrow in London. The properties will be used for the prevention and relief of homelessness or to end a main homelessness duty. This will reduce the need to place families in temporary accommodation or in PRS accommodation further away or outside London.

- 2.35. Capital Letters set an annual target for each member based on the number of staff contributed at the start of the financial year (or pro rata for part-years). The boroughs also confirm what type of properties and bedroom size they require for each year. This is then divided into a monthly rolling target. Properties are procured by Housing Negotiators “blind” (i.e. they don’t know which Borough the property will be offered to); the properties are inputted into the computer system and the algorithm determines which Borough the property will be offered to. The first criteria is based on geography – which borough is the property located in; they also use a proxy of an hours travel on public transport during peak time to determine location. The second criteria is the fulfilment of the borough’s monthly target. If the target has been met, then the property is offered to a neighbouring borough.
- 2.36. Capital Letters’ Area Managers meet with each member monthly to review performance and target achievement. If a monthly target is not met, it rolls over into the next month, which then prioritises the Borough for allocations. The algorithm can also be manually overridden to ensure members receive their fair allocation of properties and/or to meet specific needs such as adapted properties.
- 2.37. Capital Letters also provides a tenancy sustainment service which is an integral part of the offer, enabling households to successfully maintain their tenancies, thus avoiding repeat homelessness, whilst also giving landlords confidence about the security of their income and condition of the property.
- 2.38. If the Council approves the recommendation to join and become a member of Capital Letters, then the subsidy from the MHCLG grant and the tenancy sustainment service should result in cost reductions, especially when extrapolated over a significant number of placements and improve outcomes for homeless households.

### **3. Implications of the Recommendation**

#### **Environmental Implications**

- 3.1. No specific adverse environmental impacts have been identified resulting from the proposals contained in this report.

#### **Data Protection Implications**

- 3.2. Capital Letters and its operations must be GDPR compliant - all Members are London Boroughs and London Councils and so are experienced at dealing with data sharing protocols and GDPR. All operations will be GDPR compliant and signed off by Harrow’s information governance team.

#### **Consultation**

- 3.3. The proposals have been developed in conjunction with and supported by MHCLG, GLA, London Councils, the 33 London Boroughs, including the

London Councils' Housing Directors Group and London Councils' Leaders Group

- 3.4. Consultation with service users is not planned at this current time. Capital Letters would only procure within London, in areas where the existing Procurement team are already active, meaning there should be minimal effect on service users.

## Risk Management Implications

Risk	Mitigation
<p>The company does not deliver the required number of properties</p>	<p>The council is proposing to use the company to secure PRS properties for the prevention and relief of homelessness or to end a main homelessness duty. This is a proportion of the overall homelessness function activity which will still be undertaken in-house and this risk has been mitigated by retaining Procurement staff in Housing Needs Service to ensure that existing supply can be maintained.</p> <p>If Capital Letters does not work, the Council can cease to be a Member of the Company by serving six months' written notice to do so.</p>
<p>The company encounters financial difficulties and ceases to operate</p>	<p>The company has been established as a private company limited by guarantee, owned and managed by the boroughs who constitute limited liability members of the company. The risk to the Council is minimal as the liability is limited to £1. The company is required to have sufficient funds to cover their credit and any redundancy costs if they cease to operate. The company is also Teckal compliant, meaning that it complies with Contracts Regulations and European Law.</p> <p>The rights over the properties and responsibilities towards the households would need to be negotiated with Capital Letters and the legal owners of the properties and this would be done in accordance to the framework of the</p>

	homelessness legislation and the Councils duty to the household.
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## Procurement Implications

- 3.5. The recommendations set out in this report have no direct procurement implications.
- 3.6. The Contract Procedure Rules (CPRs) at 4.5.2 state that any purchase or sale of a property, interest in land and/or lease transaction is out of the scope of the CPRs. Where any procurement is required as a result of the recommendations set out in this report it will be conducted compliant with the Public Contract Regulations 2015 and the Council's CPRs.

## Legal Implications

- 3.7. Where the Council determines under the provisions of the Housing Act 1996 Part VII (as amended) that a person/household is eligible for assistance, homeless, in priority need and not homeless intentionally, it has a duty to secure suitable accommodation (unless it refers the applicant to another authority under the local connection provisions): s193(2), s206(1). The suitability of accommodation is governed by s210 of the 1996 Act, the Homelessness (Suitability of Accommodation) Order 1996 (SI 1996/3204) and by the Homelessness Code of Guidance for Local Authorities.
- 3.8. When discharging their housing duties under Part VII, an authority must, so far as reasonably practicable, secure that accommodation is available for the applicant's occupation in their own district: s208(1) of the 1996 Act.
- 3.9. The Localism Act 2011, in force in England on 9 November 2012, introduced provision for the Council to discharge its housing duty to statutory homeless households by offering a tenancy in the private rented sector. Any private rented sector offer must be suitable and must comply with the provisions of the Homelessness (Suitability of Accommodation) Order 1996.
- 3.10. The proposal will deliver additional accommodation for discharge of the Council's housing duty. However, there are no proposed changes to current processes and no change to the eligibility criteria for these households accessing accommodation through the Housing Needs Service.
- 3.11. The company is being established under the general power of competence contained in section 1 of the Localism Act 2011. This gives the power to the Council to be a member of the company.

## Financial Implications

- 3.12. Capital Letters (CL) is a not-for-profit company which is collectively owned by boroughs and supported by £38 million of grant funding from the Ministry of Housing, Communities and Local Government (MHCLG), and aims to improve the availability of housing options by reducing competition between councils. This collaborative approach will enable boroughs to access more accommodation across London and will provide a framework for placing households as close as possible to their home borough. CL has submitted a business case to MHCLG to extend the Grant period for another 2 years until 2023/24 and is awaiting formal approval.
- 3.13. The main financial benefit of taking membership and joining CL, is to access Ministry of Housing, Communities and Local Government (MHCLG) funding and increase the number of private sector properties sourced to reduce the need for Temporary Accommodation. The Council will fund 2 officers within CL using £102K of Flexible Housing Support Grant (FHSG) and these will be supplemented by 36 housing negotiators. It is proposed that MHCLG will contribute £750 in incentive payments per property. For LBH, it is assumed this will be 200 properties in 2021/22.
- 3.14. The company has been established as a private company limited by guarantee, owned and managed by the boroughs who constitute limited liability members of the company. The liability is limited to £1.
- 3.15. Increased activity and cost are currently resulting in significant pressures on the Temporary Accommodation budget and the impact of legislative changes, high value voids and losses of regeneration units will put further significant pressure on the budget over future years. In order to mitigate these financial risks, the council is looking to discharge duty by moving clients into private sector accommodation. The Council therefore needs to secure property, both in and out of borough to meet this demand and the CL scheme represents a scheme that would increase the availability of property at a reduced cost through the MHCLG subsidy.
- 3.16. CL was set up in several phases, so that not all boroughs are required to join at once. Boroughs that do not join CL will still have properties procured by CL in their area but will not have access to them.
- 3.17. The cost of joining CL would be £102,000 (2 members of staff). This would be paid directly to Capital Letters who will recruit the staff. The cost of joining is offset by the anticipated savings of £150,000. The potential savings are set out below:

	Without Capital Letters	With Capital Letters	Proposed Saving
TA Budget			
2021/22	4,321,000	4,171,000	3.5%

- 3.18. The estimated gross saving from joining CL is 3.5%. At a minimum, Harrow will receive the number of properties procured the previous year with the level of resources being input into the company i.e. 56 units. However, it is

anticipated that significantly more than these properties will be procured in practice as per para 2.33, 100 per negotiator. It is difficult to accurately forecast the exact cost reduction because any calculation involves a significant number of assumptions, unknowns and variables. These cost reductions will not have a significant impact on the overspend currently forecasted by the council but should make a positive difference.

- 3.19. As per para 2,8, Member boroughs also have the option of transferring some or all of their existing private sector leased properties into CL, which as a private landlord is eligible for 100% Local Housing Allowance (LHA) from the Department of Work and Pensions, which is higher than the rate for borough-let temporary accommodation currently 90% of 2011 LHA levels. If, at a later date, the Council decides to acquire or transfer existing PSL portfolio into CL, a detailed cost benefit analysis will be carried out at the time to assess the merits of such a proposal.
- 3.20. The council would have to review its position as and when the subsidy rates change.
- 3.21. Membership can be reviewed annually and terminated with six months' notice.

## **Equalities implications**

- 3.22. Data held by the Council suggests that women, young people, and BAME communities are over-represented among those who are at risk or are homeless. Furthermore, individuals with these protected characteristics as well as those who identify as individuals with disabilities are known to be vulnerable to homelessness.
- 3.23. It is reasonable to anticipate that this initiative will benefit the groups identified above, while also improving outcomes for those who are more likely to have regular contact with services, such as female-headed lone parent households and individuals with long-term health conditions, by maximising service access continuity.
- 3.24. The proposal to join Capital Letters will enhance and support our current work to increase supply in the Private Rented Sector (PRS) and will be an additional tool to enable the Council to meet its statutory obligations under Homelessness legislation. The additional key benefits for service users will be in relation to the quality and location of accommodation, as well as the provision of tenancy sustainment support.
- 3.25. The council also has a statutory duty to ensure all temporary accommodation placements are suitable for the applicant and all members of their household. One key aspect of suitability is the location of placements. For example, ensuring placements consider a household's pre-existing links to employment, education and/or support networks. Capital Letters would attempt to place Harrow households "as locally as possible.

## **Council Priorities**

3.25. The decision to join Capital Letters will support the Council in delivering the following Corporate Priorities.

**a. Tackling poverty and inequality**

The additional accommodation will be affordable thereby providing accommodation to the most vulnerable in the Borough.

**b. Addressing health and social care inequality**

The additional accommodation will help to prevent homelessness and support residents with more local placements.

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

**Statutory Officer: Dawn Calvert**

Signed by the Chief Financial Officer

**Date: 03/11/2020**

**Statutory Officer: Sarah Inverary**

Signed on behalf of the Monitoring Officer

**Date: 27/10/2020**

**Statutory Officer: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 20/10/2020**

**Statutory Officer: Paul Walker**

Signed by the Corporate Director, Community

**Date: 27/10/2020**

## **Mandatory Checks**

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

**EqIA carried out: YES**

**EqlA cleared by: Dave Corby**

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

**Contact:** Nick Powell, Divisional Director – Housing Services

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**Background Papers:** None.

**Call-in waived by the Chair of Overview and Scrutiny  
Committee**

**NO**