

# **Cabinet**

## **Background Papers**

**Date:** **Thursday 21 January 2021**

### **Agenda - Part I**

- KEY 12. Review of Housing and Homelessness Strategies (Part 2): Housing Allocation Scheme and Tenancy Strategy & Policy (Pages 3 - 206)**

Background papers to the report of the Divisional Director, Housing.

### **Agenda - Part II - Nil**

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# **LONDON BOROUGH OF HARROW**

## **HOUSING ALLOCATIONS SCHEME**

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

11/04/2013      The Council's Cabinet approved this scheme for implementation from 22<sup>nd</sup> October, 2013.

19/11/2015      The Council's Cabinet approved amendments to Housing Allocations Scheme which will take effect from 01/12/2015 (see appendix 18 for a summary of the approved amendments).

09/01/2017      Maximum joint household income to qualify for public rented housing amended following a review.

# Housing Allocation Scheme

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# 1. Purpose of the scheme document

## 1.1. Background

Every council is required by law to have a written scheme setting out how it will allocate the rented housing which it owns and to which it has nomination rights. This new scheme, which was implemented on 22/10/2013 and amended on 01/12/2015 and 09/01/2017, replaces the London Borough of Harrow Lettings and Transfer Scheme dated 05/04 03, last amended on 13/12/12.

## 1.2. Housing Priority

This document explains the options for people looking for a home in the London Borough of Harrow, and sets out which groups of people are priorities for an allocation of the public rented housing♠ made available by Harrow Council and housing associations in our area♣.

## 1.3. Types of tenancy

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

## 1.4. Procedures for letting public rented housing

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

## 1.5. Consultation

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

## 1.6. Changing the scheme

We will review the scheme at least every 5 years. The housing portfolio holder has the delegated power to approve any interim amendments recommended by the director of housing that would affect fewer than 10% of lettings.

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♠ The term public rented housing is used throughout this document to mean homes let on any kind of secure, assured, fixed term or flexible tenancy by a council or housing association or other publicly funded housing provider. The more usual term of “social housing” is avoided in order to make it clear that the policy does not cover shared ownership or “intermediate” rented housing but does cover properties let at “target”, “social” and “affordable” rents.

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

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

## 2. Housing advice

### 2.1. Our service

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

### 2.2. Contact details

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

### 2.3. Housing assistance

Large numbers of people seek low-rent public and private housing in Harrow, but only small numbers of homes become available to the council each year. We regret, therefore, that we are only able to offer help with accommodation to a very limited number of households. This help can include, depending on individual circumstances, enabling people to stay where they are living now or facilitating a move to a private rented or low cost home ownership home. For many people a move to public rented housing in Harrow is unlikely to happen.

## 3. Housing in Harrow

### 3.1. The housing market in Harrow

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

### 3.2. Specialist housing

Some homes within Harrow are designed for particular groups. These include rented and leasehold sheltered and retirement housing for older people, and schemes with on-site support for particularly vulnerable people such as teenage mothers and people with learning difficulties.

### 3.3. New rented social housing

The council works successfully with housing associations to increase the supply of affordable rented properties in Harrow, but the numbers of such units (usually around 100 each year) is not enough to keep pace with the demand and has generally fallen short of the number of council homes lost as a result of the right to buy legislation. Access to such homes is through nomination via “Locata” (see section 5 below).

### 3.4. Housing Association allocations

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

### 3.5. High demand and low supply

Many people wish to move to council or housing association rented homes because these offer below-market rents and because people perceive them as giving greater security of tenure than homes rented by landlords in the private sector. However the supply of this type of housing is very limited. Each year we expect to re-house around 400 households into public rented housing. Half of the vacancies are studio and 1- bedroom flats, normally suitable only for single people and childless couples. Half of these small units are reserved for older people. Yet at any one time we have around 5,000 households who have registered their interest in taking such a tenancy, and over 1,200 new households applying to register each year. The overwhelming majority of applicants with an acknowledged housing need are families, for whom most of the available accommodation is unsuitable.

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

The following table shows that the larger the number of bedrooms needed, the greater is the demand. This means the larger the number of bedrooms required by a family, the longer are the waiting times and the lower is the likelihood of ever

receiving an offer.

	0-1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms+	Total
1. Numbers of homes owned by the council	2,000	1,467	1,393	105	4,965
2. Numbers of vacancies* Apr 2011 to Mar 2012	242	134	78	25***	479**
3. Nos. of households registered in bands A-C as at 01/04/12	1,137	1,144	1,006	505	3,792
4. Ratio of demand to supply as at 01/04/12 (row 3:row 2)	<b>5:1</b>	<b>8<sup>1</sup>/<sub>2</sub>:1</b>	<b>13:1</b>	<b>20:1</b>	
* The year 01/04/11 to 31/03/12 was a fairly typical year as far as the profile of property size and ratio of demand to supply goes, although the number of lettings in a year can vary from as low as 375 to as high as 520.					
** No. of vacancies includes both council housing and the housing association homes to which the council has nomination rights, which varies from 50% to 100% of each association's vacancies.					
*** Because of the small supply of 4-bedroom homes we let 3-bed homes that have two reception rooms as if they were 4-beds (unless the second room is unsuitable for use as a bedroom).					

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

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

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

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

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

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

## 4. Aims of the Scheme

### 4.1. Overall aims

The Council aims ensure that public rented housing goes to those with the most need, as defined by local (rather than abstract and arbitrary national) standards, while reducing the budgetary impact of homelessness. The housing allocations scheme is one of a group of policies that sits beneath Harrow's overarching Housing Strategy. The allocations scheme supports one of the strategy's key objectives, which is to "enhance housing options and promote mobility and choice". A number of other factors have also been taken into account in order to produce a balanced and fair allocation policy and process.

### 4.2. Supporting vulnerable people

The scheme reflects the Council's ambition, as set out in its Sustainable Community Strategy 2009-2020, to support and protect people who are most in need. It aims to give the highest priority to those who are less able to provide for their own housing needs than most of the population and therefore most in need of the council's help when their accommodation is unsuitable for their needs. We define unsuitable housing as accommodation that is:

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

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

### 4.3. Tackling homelessness

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

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♣Because the latter do not have to agree to an offer of private sector housing aimed at ending the full duty

#### 4.4. **Supporting those who work in low paid employment**

Section removed from the scheme on 01/12/2015 (see appendix 18 section 8)

#### 4.5. **Promoting informed choice**

Under the scheme housing applicants become “members” of the West London choice based lettings scheme, called Locata, and actively search for a home♥. By letting and nominating to our properties in a transparent, applicant-friendly, and fair way we aim to empower applicants and promote equal treatment♠.

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

The significant changes in this revised choice based lettings scheme are: (a) a reduction in the numbers of people who qualify for priority under the scheme, so that they do not have to wait as long as formerly for an offer, and (b) disqualification of those with no priority (formerly “band D”) – once they have completed an application they will have access to personalised housing options advice online, but will be unable to bid for public rented housing♣.

#### 4.7. **Equality and Fairness**

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

**Treating tenants and homeseekers equally:** The Localism Act allows the council to allocate properties to council tenants outside the allocations scheme. Harrow, however, prefers to keep most lettings within the scheme to promote transparency, clarity and equality. Appendix 14 lists cases that do not qualify as “lettings” and hence do not need to be covered by this allocation scheme.

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♥The choice based lettings banding system replaced, in 2002, a “points” system, under which council officers decided which applicant would be offered which property.

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

♣Continually bidding from band D but never receiving an offer gave applicants false hope and was a source nationally (not just in Harrow) of much customer dissatisfaction with choice based lettings schemes.

#### 4.8. **Facilitating Inter-borough mobility**

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

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

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

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

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

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

#### 4.10. **Other corporate policy objectives**

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

## 5. West London Locata

### 5.1. The central lettings agency

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

### 5.2. West London Locata

The partner boroughs and housing associations which advertise properties in the west London scheme as at 31/03/13 were:-

♣London Borough of Brent	Hyde Hillside
♣London Borough of Ealing	Inquilab
London Borough of Hammersmith & Fulham	Network Stadium
♣London Borough of Harrow	Nottinghill Housing
♣London Borough of Hillingdon	Octavia
♣London Borough of Hounslow	♣Paradigm
A2 Dominion	Stoll
♣Catalyst Housing	Shepherds Bush Housing Assoc
♣Genesis	Thames Valley Housing
	Westway Housing Association Ltd

- 5.3. **Eligibility of other Locata partners' members for Harrow properties** Harrow makes available a small number of its vacancies for cross-partner advertising and a small proportion of other partners' vacancies is available for Harrow members to bid for. The cross-partner scheme applies to lettings of Harrow public rented housing to the homeseekers and transfer applicants of all other organisations, including those that joined since 31/03/13 or may join the partnership in the future. Sections 14.2 and 20.7 explain how Harrow deals with bidders who are registered with other Locata partners.

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♣Indicates a part-owner of Locata Housing Services Ltd.

## 6. How the scheme works

### 6.1 Priority banding

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

### 6.2. Property advertising

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

### 6.3. Expressing an interest – “bidding”

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

### 6.4. Feedback on let properties:

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

### 6.5. Ensuring fairness for different groups

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

- An overwhelming 85% of applicants are people who do not currently have a public sector tenancy, referred to as “homeseekers” (this includes homeless households).

- The second group, referred to as “transfers”, comprises secure and flexible tenants of the council and those assured and flexible tenants of housing associations in the borough who decide to apply to the council rather than their own landlord for a move. Both kinds of transfer applicant together make up only 15% of registered Locata members.
- In addition there is a very small number of applicants who do not fit into either group, including those from outside Harrow who are offered tenancies under an inter-borough mobility scheme (see section. 4.6 above) or a reciprocal arrangement with the police or a social care service agency.

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

#### 6.6. Transitional relief arrangements

We protect some categories of applicant who applied and were assessed under the old priority categories and who will no longer have priority under the new scheme. If they had accrued a long waiting time in band C at the implementation date♣ they are still able to obtain public rented housing as band B applicants (the equivalent of the old band C) until they are either offered suitable permanent public rented housing, are residing in accommodation that is considered suitable for their household’s needs, or their circumstances change. The length of waiting time will vary with the size of property required, as shown in table 2 below, and will be calculated from, 22/10/2013, the date of implementation.

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

- Those who are overcrowded by only 1-bedroom
- Those whose priority for overcrowding is based on the old Locata standard and does not count as overcrowding under the national bedroom standard (subject to affordability where the family is benefit- dependent)
- Those whose priority for overcrowding includes family members aged 21 or over who do not need to live in the household either to receive or provide care and essential support
- Those whose medical or welfare priority to move is of a variable or comparatively mild or moderate nature.

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

**Table 2 – Transitional protection for non-homeless applicants**

No. of bedrooms needed	No. of yrs. wait to qualify for transitional relief	No. of lettings expected in 2013/14
1-bedroom (non-sheltered)	2 or more	70 out of 140
2-bedroom	5 or more	60 out of 120
3-bedroom	7 or more	40 out of 80
4 or more bedrooms	8 or more	12 out of 24

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

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

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

**Table 3 – Transitional protection for accepted homeless applicants**

No. of bedrooms needed	No. of yrs. wait to qualify for transitional relief	No. of lettings expected in 2013/14
1-bedroom (non-sheltered)	2 or more	2 out of 140
2-bedroom	5 or more	2 out of 120

**6.8.** We have protected the band C priority of the 22 homeless families from bed and breakfast who were offered council 1-bed flats on the basis that they could keep the priority for 2-bedroom accommodation they would have had if they had remained homeless.

## 6.9.

<b>Table 4 – Groups not entitled to transitional protection</b>			
Group	Exceptions	Bands	Treatment
Those with income or savings over the newly designated limits (appendix 10) for eligibility for an allocation of public rented housing	Discretionary hardship exceptions as referred to in appendix 10.	A, B and C	Applicants disqualified under the new scheme; transitional relief will not apply.
Those not currently resident in Harrow at the date of implementation of new scheme	Those who qualify to apply as listed in section 7.4 below.	C and D	Applications will be closed; transitional relief will not apply.
Those who have not lived in Harrow for 5 years at the date of implementation of the new scheme	a. Those who qualify to apply as listed in section 7.4 below. b. Those who have been awaiting a 1-bedroom allocation for 2 or more years as listed in section 6.6 above	A, B, C and D	Applications disqualified; transitional relief will not apply.
Accepted Homeless applicants and formerly accepted homeless applicants who accepted a qualifying offer in the private rented sector who require family-sized accommodation (3 or more bedrooms).	Those who, on reassessment, qualify for band A*, A or B on grounds set out in the new scheme.	C	Applicants will remain in band C.

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

### 7.1 How to make an application

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

### 7.2. Validated applications

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

### 7.3 Assistance with making an application

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

### 7.4. Who can make an application

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

- living in Harrow.
- homeless within the meaning of Part VII of the Housing Act 1996, and have been assisted by Harrow with out of borough temporary accommodation, as long as they continue to have a priority need♦

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

♦priority need is defined in Part VII of the Housing Act 1996, as amended.

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

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♠“former members” are defined as those who left the armed forces within 5 years of the date they make a housing application.

♥not including the pan London tenant mobility scheme, which has its own application process.

## 7.5. Exclusions

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

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

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

♠Homelessness Act 2002, S.14(8)

♥We may decide to prosecute in cases of attempts to falsely claim priority for housing

- (5) they are assessed as having no significant housing need – i.e. they do not fit in any of the priority categories described in section 8 below.
- (6) they have sufficient financial resources to house themselves (see appendix 10 which explains how we determine this)

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

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

The application assessment procedure is described in appendix 11. We will write to applicants to tell them if their assessment is likely to take longer than 28 days and the reasons for it.

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

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

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

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

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

We will consider a fresh application if:-

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

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

**7.10. Change of Circumstances**

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

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

Staff, housing association board members, council members and their relatives are treated the same as any other housing applicant and must be seen not to be gaining any advantage or disadvantage or any preferential treatment in the course of their application. The procedure for ensuring that Harrow Council is transparent and equitable when letting homes to staff, board members and councillors is set out in appendix 15

## 8. Housing priorities in Harrow

### 8.1. The statutory “reasonable preference” priorities

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

- medical needs, including needs relating to a disability (**group 1**) Note: Harrow gives only those with a very high level of medical need to move reasonable preference for housing .
- welfare grounds (**group 2**);  
Note: Harrow gives only those with a very high level of welfare need to move reasonable preference for housing.
- they are occupying unsanitary or overcrowded housing, or are otherwise living in unsatisfactory conditions (**group 3**)  
Note: Harrow gives only those who lack *more than* one bedroom or are living unavoidably in *severely* unsatisfactory conditions reasonable preference for housing;
- the council has accepted a duty under homelessness legislation (**group 4**);
- another council has accepted a duty under homelessness legislation and Harrow is satisfied that the council that owes the duty is unable to provide accommodation (**group 4A**)
- the council has agreed that they are homeless but has decided either that they do not have a priority need or that they are intentionally homeless or has ended the full duty because of refusal of a suitable offer (**group 5** ).
- they need to move to a particular locality within the borough and failure to meet that need would cause hardship (to themselves or others) (**group 2A**).  
Note: Harrow does not normally give priority to people who say that they need to move to a particular locality within the borough, because the area covered by Harrow is small and transport within it is very good, so there should be little disadvantage arising from living in one part rather than another. If, exceptionally, we are satisfied that there will be such hardship, which has given rise to a social services care plan requiring a move for this reason, we will treat it as a move on welfare grounds (*i.e.* **group 2**).

### 8.2. Harrow’s priorities

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

- **Group 6 – Homeless duty ended by qualifying offer of private sector accommodation:** formerly accepted homeless applicants who have accepted a qualifying offer of private sector housing (should they choose to re-register and subject to the household continuing to have a priority need as defined by homelessness law);
- **Group 7 – Underoccupiers♣:** People living in public rented accommodation which is larger than they need who will move to smaller public rented accommodation (this can be anywhere in the country, not just Harrow).
- **Group 8 (welfare preference) Low paid full time employment**  
Group removed following amendments made to allocations scheme on 01/12/2015 (see appendix 18 section 8)
- **Group 9 (welfare preference) – Disability-adapted housing:** People living in public rented accommodation which is adapted or purpose built to accommodate physical disability where no-one in the household needs such facilities. We also prioritise for a move those council and housing association tenants who need major adaptations but whose current home it would be impractical or uneconomic to adapt.
- **Group 10 (welfare preference) – Adoption & fostering:** People recommended by Children’s Services as suitable to adopt or foster one or more children but who need more appropriate housing in order to do so and do not have the means to source the accommodation themselves. In the case of fostering we will offer flexible tenancies which are unlikely to be renewed if it ceases.
- **Group 11 – Tenancy succession and occupiers holding over:** People who are not entitled to succeed to a council tenancy or to the renewal of a flexible tenancy but to whom the council would have a statutory homelessness duty *and* who do not have the means to source alternative accommodation themselves, where the property is larger than they need.
- **Council-interest transfers:** both emergency and urgent tenant transfers (**group 12**), permanent decants (**group 13**) and service tenant move-ons (**group 14**) that are in the council’s interest (including for any of the reasons set out in section 4.7 above).

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

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

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♣Institutions include prisons and mental health residential placements

♠"former members" are defined as those who left the armed forces within 5 years of the date they make a housing application

## 9. The Banding Scheme

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

9.2. The five priority bands are:-

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

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

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

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

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

Note: band A is a mix of the old band B urgent cases and some of the old band C reasonable preference, but has a much tighter definition of overcrowding and medical need than did the previous scheme. The new band also includes some council-interest transfers (groups 13 and 14).

## band B “Standard priority”

- another council has accepted a duty under homelessness legislation and Harrow is satisfied that the council that owes the duty is unable to provide accommodation (group 4A)
- Older residents whose likelihood of remaining independent would benefit from the supported environment of sheltered housing, but who do not meet the otherwise high assessment threshold for medical or welfare “reasonable preference” (group 19).
- Applicants who qualify for transitional relief.

## band C “Non-urgent priority”

- **Full homeless duty not accepted:** homeless people to whom the council has not accepted a duty, either because found intentionally homeless or because there is no priority need.
- **Homeless people where the duty was accepted after 13 December 2012,** who have refused a reasonable offer of private sector housing since they approached Harrow for housing.
- **Homeless people** where the council has accepted a duty under homelessness legislation and has provided either emergency accommodation (anywhere) or suitable self-contained temporary accommodation **Homeless people** where the homeless application was made after 08 November 2012; band C will apply for up to 1 year from the date of discharge of the duty into a private rented sector home.
- **Homeless people** to whom the council has ended its duty because of a refusal of a reasonable offer of housing, as long as they remain homeless (subject to verification in case of a successful Locata bid).
- **Homeseekers** with an identified housing need to whom the council gives reasonable preference because they are occupying unsanitary or overcrowded private rented housing or are otherwise living in unsatisfactory conditions in private rented accommodation (group 3).
- **Serial refusers:** certain categories of people in band A+ who have refused a reasonable offer of housing, or people in band A who have refused 2 offers, or B who have refused 3 offers (details at app’x 14).
- **Deliberate damage to property:** people who, even though they are owed the statutory reasonable preference, have put their temporary accommodation or public rented housing into such a bad state, as judged on inspection<sup>♣</sup> that the cost of bringing it back to a lettable standard far exceeds the acceptable level of costs that would normally be incurred

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

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

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

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

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

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

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

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

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

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

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

## 10. Waiting Time

### 10.1. Moving between bands

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

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

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

<b>Table 5 – Examples of priority dates as applicants move between bands</b>	
<b>Example 1</b>	<b>Priority Date</b>
Member applies in January and is disqualified	None
In February member is placed in band A	February
In March member is placed in band A+	March
In April member is downgraded to band C	February
<b>Example 2</b>	<b>Priority Date</b>
Member applies in January and is placed in band B	January
In February member is placed in band A	February
In March member is placed in band A+	March
In April member is downgraded to band A	February
<b>Example 3</b>	<b>Priority Date</b>
Member applies in January and is placed in band B	January
In February member is placed in band A+	February
In April member is downgraded to band A	February
<b>Example 4</b>	<b>Priority Date</b>
Member applies in January and is placed in band A for medical reasons	January
In February member is accepted as homeless, moves to suitable temporary accommodation and is placed in band B	January
In April member refuses direct reasonable offer but remains homeless – band C	January

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

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

- Time limits (shown in the chart in appendix 16) are enforced in order to ensure that only genuine emergency and urgent cases are given high priority. Members given emergency and urgent status must actively bid for properties, attend accompanied viewings when invited, and must not refuse offers on grounds that have nothing to do with their emergency or urgent housing needs.
- We want to be able to give people a realistic idea of how long re- housing will take under the scheme. We expect people to wait just long enough to meet their assessed needs, not to acquire a long waiting time in order to pick what they consider to be the best property. We will make such applicants a reasonable direct offer which, if refused, will result in demotion to band C or, for medical and welfare cases, from A+ “Emergency” band to band A.
- In practice time limits depend on the type of property needed and the supply during the bidding period. The council will take into account whether high priority members are making appropriate bids and whether they are refusing properties unreasonably.
- Band A+ “Underoccupation” rating has no time limit, because the council is keen to see underoccupiers move and will not penalise them for taking their time to decide.

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

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

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

## 11. Who can be considered part of the household? ♦

### Both Homeseekers and transfer tenants

#### 11.1. Definition of immediate family

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

#### 11.2. Family living abroad

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

#### 11.3. Joint access cases

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

#### 11.4. Extended family

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

#### 11.5. Dependant relatives

A relative who has joined the household because they are unable to live independently will be included on the application only if there are no other options for the family♥. We will expect to see advice from an appropriate professional confirming that the relative needs to live with the family. Where this is not considered essential other options, such as sheltered housing, will be discussed with the family before an assistant manager in the housing assessment team decides whether the relative should be included in the application or advises them to make a separate housing application.

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

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

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

## 11.6. Carers

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

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

## Homeseekers only

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

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

## Transfer tenants

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

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

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

11.12. If we agree to re-house the immediate family but not everyone currently living with the applicant, the tenant has a responsibility to ensure that no unauthorised occupants remain in the property when they leave it.

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

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

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

## 12. Removal from the Housing List

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

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

### 12.2. Moving out of the borough

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

### 12.3. Procedure for removing

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

### 12.4. Communication following removal from registration

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

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

## 13. Re-registrations (renewals)

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

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

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

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

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

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

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

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

### 13.4. Reinstatement of a closed application

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

## 14. Inward mobility

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

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

### 14.2. Applicants from other Locata partners

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

### 14.3. Reciprocal requests

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

### 14.4. Special requests

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

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

♣To enable those testifying in major criminal trials to make a new life away from the risk of reprisals.

♥To tackle gang violence.

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

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

Because of the shortage of accommodation in Harrow we only accept incoming nominations for sheltered and designated elderly accommodation♥. Such nominations from other housing organisations can be considered only from homeseekers (from any borough outside the West London Locata partnership), and from public rented tenants (from outside London♣), where there is a local family connection. Applicants must register with the authority where they have the most connection but they can bid for cross-borough properties. Accepted applications will be placed in band B and treated as if they were in-borough applicants.

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

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

## 15. Housing for older people

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

### 15.2. **Older peoples' dwellings and retirement housing**

These are specifically designated as part of a local lettings policy for older people who can live independently, and may be connected to a helpline. The advertised age criteria may be 45+, 50+ or 55+.

**Exceptions:** The age criteria may be slightly relaxed at the discretion of the assistant service manager responsible for allocations to enable particular very vulnerable individuals to be considered. For some flats fairly good mobility is necessary, as many are on the first or second floor without a lift.

### 15.3. **Sheltered Housing**

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

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

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

### 15.4. **Very Sheltered/ Extra Care Housing**

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

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

## 16. People with mobility difficulties

### 16.1. Mobility classification

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

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

### 16.2. Mobility assessment

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

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

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

3. Independent but can only manage one or two steps

### 16.3. Purpose-built and adapted vacancies

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

waiting for this type of home get first consideration.

#### 16.4. **General needs property vacancies**

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

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

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



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

## 17. Advertising properties

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

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

### 17.2. Exclusions from advertising

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

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

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

- whether available for transfers or homeseekers or both, minimum and maximum numbers of persons in the household if children are allowed
- in the case of a house or flat with a private garden whether it will be prioritised for families with children under the age of 12 (done whenever practicable)
- if there are age-limits (over 45, 50, 55, 60 or 65)
- the mobility level, if applicable (see section 16 above on physical mobility needs)
- if applications are restricted to or prioritised for special cases such as quota/ homeless/ decant/ key worker/ same estate/ overcrowded or underoccupying households
- if pets are allowed
- whether available for cross-borough bids
- if sheltered
- whether in a scheme that caters specifically for a particular group of people (e.g. Asian elders)

### 17.4. Other information given in the adverts

The adverts also, where possible, specify:-

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

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

The council may from time to time agree with partner housing associations a local lettings policy aimed at promoting sustainable estates, good tenancy management, and meeting the needs of a local area. LLPs must be evidence-based and fulfill a clear need♣. LLPs must be approved by the service manager for the housing needs service in conjunction with any relevant housing association(s) following an equalities impact assessment that takes into account any effect of the policy on the council's ability to house applicants with high priority within the expected timescales♥. LLPs should be reviewed by the service manager for housing provision in conjunction with the partner housing associations on a regular basis (at least every two years).

### 17.6. **Sensitive lettings**

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

a history of anti-social behaviour or nuisance

a history of drug or alcohol misuse

a history of drug-dealing caused housing management problems in previous accommodation, including emergency and temporary accommodation.

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

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

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

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

**17.7. Housing association vacancies**

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

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

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

## 18. Bidding for properties

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

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

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

### 18.2. Limitations on bidding

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

### 18.3. Bidding for the wrong properties

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

### 18.4. Direct allocations

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

### 18.5. Persons not suitable to bid

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

### 18.6 Support with bidding

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

## 19. Eligibility of Bids

### 19.1. Bidding rules

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

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

**Table 6 – Bidding rules**

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

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

♣When a member comes top of more than one bidding list the decision as to which property to offer is at the landlord’s discretion

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

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

### 19.2. **Other bidding criteria**

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

### 19.3. **Number of bedrooms**

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

### 19.4. **Illegitimate bidding**

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

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

## 20. Tenant selection, viewing and offers

### 20.1. Ranking of bids

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

- first by band
- second by date order within each band
- third by registration date, and
- finally by random selection♣.

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

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

The prioritised list is given to the landlord for offering.

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

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

### 20.4. Invitations to view

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

### 20.5. Ability to afford the rent

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

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

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

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

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

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

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

**20.8. Property condition**

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

**20.9. Refusals**

If the member refuses an offer, the next member is selected. Penalties for unreasonable refusals are set out in the chart in appendix 16. The property may be reserved for a direct offer to someone who fails to attend or who wishes to refuse it, in order to protect, for example, a potentially homeless member from eviction. We ask housing association partners to co-operate with us, by not immediately signing up the next person on the list in cases where we have made a direct offer to an urgent case and have requested that the property be held for them.

**20.10 Tenancy transfers**

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

**20.11 Joint tenancies**

It is usual for a joint tenancy to be granted to married and cohabiting couples, civil partners and same sex couples, and to brothers and sisters with a joint application. The council will also support other adult applicants wishing to sign as joint tenants, depending on the circumstances of the case.

**20.12 Information about the reason for the vacancy**

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

## 21. Number of bedrooms

### 21.1 Maximum and optimum numbers of bedrooms

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

### 21.2. Bedroom needs assessment

<b>Table 7 – Comparison of bedroom standard and Harrow rules</b>	
Maximum bedroom eligibility is determined using the following guidelines, which are based on the national “Bedroom Standard” (BS) but with some difference	
<b>BS – separate bedroom</b>	<b>Harrow scheme for comparison, including changes from the previous allocation scheme</b>
A married or co-habiting couple	The same as the BS and the same as the previous allocation scheme
An adult aged 21 years or more	Harrow’s scheme does not take into account sons and daughters aged 21 or over in calculating the number of bedrooms required. Instead we will do our best to assist adult sons and daughters to find their own private sector accommodation. Where Adult Social Care recommends, and we agree, that it is essential for an adult son or daughter to remain in the family home either to give or receive care, we will allocate a bedroom accordingly. Similarly, adult relatives living as part of the household are entitled to a bedroom if they need to live with the household either to give or receive care (see section 11 above).
A pair of adolescents aged 10-20 years of the same sex	(a) The previous allocation scheme assigned a separate bedroom to same sex siblings where one is aged 10 or more if there was a 5 year age gap. This is no longer the case as the new scheme applies the BS. (b) If the household comprises a mother aged under 21 with a daughter they will be eligible for a bedroom each, just as if the mother was aged 21.
A pair of children aged under 10, regardless of sex.	The previous allocation scheme assigned a separate bedroom to opposite sex siblings where one is aged 7 or more. This is no longer the case as the new scheme applies the BS.

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

### 21.3. **Discretionary additional bedroom**

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

### 21.4. **Ex-service tenants and Underoccupiers**

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

### 21.5 **Overcrowding**

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

### 21.6 **Flexible tenancies**

When flexible tenancies are reviewed prior to their renewal date, the assessing officer will look carefully at the number of bedrooms needed by the household. If people have left the household, or care needs have changed, since the tenancy was granted, and if it is agreed that the tenant continues to be eligible for a public rented tenancy, the new tenancy will be offered for a smaller home in line with the reassessed need. Such new tenancies will either be offered directly or through banding on Locata, as appropriate to each case. .

### 21.7. **Bedroom need (maximum and minimum) at a glance♣**

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

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

♣Shows the number of bedrooms needed - only where the current home is 2 bedrooms short of this number will preference for overcrowding be given.

<b>Table 8 – At a glance bedroom need calculator</b>							
	Studio/ Bedsit	1	2	3	4	5	6
Single Person							
Cohabiting or Married Couple							
Adult siblings wishing to live together ♣							
Pregnant but childless woman (with or without partner)							
Parent(s) with one child ♥							
Parent(s) with one girl and one boy both aged under 10							
Parent(s) with two same sex children Aged under 21							
Parent(s) with 1 girl and 1 boy where one is 10 or older							
Parent(s) with 1 girl / 2 boys, or 2 girls / 1 boy all aged under 21							
Parent(s) with 4 children, 2 of each sex, all aged under 21							
Parent(s) with 4 children where 3 are of 1 sex and 1 of the other & all aged under 21							
Parent(s) with 5 or more children all aged under 21 ♠							

### 21.8. Realistic bidding

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

♣Unless it is agreed that one sibling is the carer for the other

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

♠maximum bedroom need depends on age & sex of children.

### 21.9. **Studio Flats**

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

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

### 22.1. Offer withdrawal or bypass

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

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

### 22.2. Change of circumstances

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

### 22.3. Disqualification

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

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

### 23.4. Unable to afford the rent

The reductions in and caps on benefit introduced by the 2010-2015 government have resulted in problems for benefit dependent people, especially those with large families, living in all parts of London, including Harrow♣. In the event that an applicant is found to be unable to afford the rent they may not be verified for an offer.

### 22.5. Financial resources available to meet own housing costs

Applicants who are found to have sufficient financial resources (income/ capital/ freehold, leasehold or joint interest held in a home) to obtain accommodation for themselves in the private sector or through a low cost home ownership scheme, taking into account the size and type of property needed (appendix 10 sets out the financial limits we apply).

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

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

#### 22.6. **Right to buy application**

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

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

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

- Council and housing association tenants, and homeless homeseekers placed in temporary accommodation, who have rent arrears (appendix 12 sets out the council’s rent arrears policy)

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

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

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

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

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

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

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

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

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

- Tenants or homeseekers who owe the council money.

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

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

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

## 23. Direct offers

### 23.1. Circumstances for direct offers

In certain limited circumstances, we use our discretion to allocate properties directly to the following members and to applicants ineligible to become members. Whenever possible the offer we make will be for a property for which a bid has been placed on Locata either by the applicant or by staff, and for which the applicant would be the highest priority bidder. We consider a reasonable offer of accommodation to be one which is not in an area which is known to be unsafe for that member and, so far as reasonably practicable, matches the size and type of property for which the applicant is eligible as set out in the table in section 21.7 above. As there is a shortage of large homes, the applicant may be offered smaller accommodation than they would prefer, in furtherance of the council's statutory homelessness duties.

### 23.2. Special circumstances

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

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

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

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

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

### 23.5. Temporary decants

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

### 23.6. Permanent decants

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

**23.7. Non-statutory successors, unauthorised occupants and flexible tenants whose tenancy is not to be renewed**

One offer will be made to those who have failed to make a successful bid for alternative accommodation within the necessary timescale. If the offer is refused we will start possession proceedings.

**23.8. Over-riding emergency need**

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

**23.9. Limited circumstances**

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

## 24. Non-secure tenancies

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

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

### 24.2. What happens when possession is required

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

### 24.3. Asylum seekers

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

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

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

## 25. Refusals following direct offers

### 25.1. Recording the refusal

The applicant must give their reasons for refusal in writing, or sign a written statement of their reasons. The property will not usually be held vacant while the refusal is investigated – it will normally be re-offered and let to another applicant unless the offer is to a homeless household. In such cases the offer may be held for a short period (usually no longer than 48 hours) while the reasons for the refusal are considered in consultation with one of the team leaders for homelessness advice and assessment and the applicant is advised of the possible consequences and given a chance to reconsider their decision to refuse.

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

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

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

### 25.3. Unsuitable offers

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

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

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

**25.4. Ex-service tenants**

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

**25.5. “Special circumstances” and quota cases**

Following a refusal of a reasonable offer, applicants will be advised that their high priority has been removed and they will be placed in the appropriate band on the general waiting list if they are eligible persons. Children’s Services (in the case of looked after children), the relevant supported accommodation provider (in the case of the move on quota), or the professionals involved in a “special circumstances” case will be kept fully informed at all stages.

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

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

**25.7. Emergency management transfer:**

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

## 26. Outgoing Mobility Nominations

### 26.1. The “housingmoves” scheme

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

### 26.2. Non-housingmoves mobility

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

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

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

### 26.4. The nomination process

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

## **Appendix 1 – Consultation on & context of this allocations scheme**

In drawing up this scheme we consulted:

- all housing association landlords with which the Council has nomination arrangements
- other third sector organisations through the Voluntary Sector Housing Forum
- various departments of the council, including both children's and adults' social services
- various strategic partner agencies such as the mental health service in Harrow
- Harrow's partners in West London Locata.

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

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

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

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

**Table 9: Aspects of Harrow’s strategy to which the scheme contributes, additional to those set out in section 4 of the scheme**

<b>Strategic aim</b>	<b>Example of how allocations policy can help</b>
a) Tackling homelessness	Ensuring that the priority scheme does not unintentionally offer an incentive to become homeless (e.g. by offspring asking their parent to exclude them).
b) Increasing the supply of affordable housing	Giving high priority for a move to tenants who no longer need a larger home or no longer need disability adaptations so as to take full advantage of the potential offered by the new fixed term tenancies. Providing clear financial guidelines so as to ensure that tenants and homeseekers who have the financial wherewithal to move to shared ownership or to their own housing in the private sector are directed down that pathway rather than occupying scarce public rented units.
c) Providing excellent customer service	Managing customer expectations by prioritising only those people who can realistically be re-housed with an acceptable wait and offering alternative housing solutions to those without priority.
e) Keeping neighbourhoods safe	Ensuring that people who are likely to cause nuisance on estates do not get priority.
f) Improving neighbourhoods	Ensuring that no one block or estate gets more than its fair share of people who are benefit-dependant.
g) Supporting independence of older people and people with disabilities	Ensuring that, where older people and people with disabilities can be assisted through an allocation of public rented housing to develop independence or remain independent for longer, or gain access to essential facilities, they are offered suitable housing.
h) Sustainability - local homes for local people	Ensuring, through the 5-year residence qualification, that priority for housing goes first to those with the strongest local ties to Harrow.

## Appendix 3 – Non-eligible people from abroad♥

### 1. Applicants who are eligible

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

.../Cont'd...

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♥The statutory framework for eligibility is subject to alteration by the Secretary of State and over-rides this allocations scheme if the latter is out of date.

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

♣The Common Travel Area comprises the UK, Channel Islands, Isle of Man and Eire

♦Existing public renting tenants are free to apply for a transfer regardless of their immigration status

## 2. Applicants who are not eligible

- l. Person subject to immigration control without the required leave to remain
- m. Illegal entrant
- n. Asylum seeker
- o. Person in the country on condition that they have no recourse to public funds
- p. Person from abroad who fails the habitual residence test (with some exceptions as listed above)
- q. Person from abroad who is in breach of the European Community Right of Residence Directive
- r. Person whose only right to reside in the UK arises under European law based on their status as a job seeker or an initial 3 months right of residence
- s. Person from abroad who has been the subject of a sponsorship agreement for less than 5 years and whose sponsor is still alive
- t. Person with limited leave not granted as a result of a claim for asylum ♠

## 3. Restricted Cases

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

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

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♠People with limited leave can apply directly to housing associations.

## Appendix 4 – Reviews

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

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

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

### Procedure

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

### Outcome option 1: Original decision upheld

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

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

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

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

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

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

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

### **New information supplied**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## 6. **Criteria to be considered**

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

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

## 7. **Types of report that may be relevant**

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

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

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

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

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

## 8. **Decision**

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

## 9. Multiple needs examples

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

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

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

## Appendix 6 – Verification

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

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

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

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

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

### Sensitive Lettings

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

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

### Affordability

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

## Home visit

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

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

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

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

## At the point of offer

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

## Desktop check

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

## **Visit Report**

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

## **Deadlines**

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

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

### **Applications for Succession**

When a tenant dies, and remaining occupants of the property apply to take on the tenancy but are not legally entitled to succeed to the tenancy, the housing management officer for the area will interview the applicant(s). The housing management officer will then submit a report to the team manager responsible for housing management. The report will also be considered by a team manager in housing assessment who are required to reach a joint decision, taking into account of the following:-

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

### **Occupiers Holding Over**

In any case where a tenancy is due to end or has been ended by the tenant(s) serving Notice to Quit or a Surrender, the housing management officer for the area will interview anyone in occupation after the tenancy has ended or expected to be in occupation when the tenancy ends, and who makes an application for continued accommodation. The housing management officer will then submit a report to the team manager responsible for housing management. The report will also be considered by a team manager in housing assessment and they are required to reach a joint decision. Every effort will be made to reach a decision on the application before the tenancy ends.

In reaching a decision as to whether an allocation will be made, account will be taken of the following:-

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

## **The application process**

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

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

## **Decision options on applications from Non Statutory Successors and Occupiers Holding Over**

1. **Offer the tenancy of the existing property** – the housing management officer will make arrangements to sign them up.
2. **Offer the tenancy of a smaller, non-adapted, or other type of property** – the housing management officer will advise the housing options team that the applicant has been approved for band A+ priority on Locata. The housing management officer will give the decision in writing to the applicant advising them that they have a right to appeal against the decision to the service manager for Resident Services. Both the housing options officer and the housing management officer will advise the applicant that they have a limited period from date of registration to exercise choice by bidding for appropriate properties. The usual guidelines for time limited bidding are 3 to 6 months, but in the case of a property that has more than 1 bedroom or where there is a particular requirement such as ground floor or mobility adaptations the housing management officer should check with the housing options team in order to give a reasonable deadline. If they fail to secure accommodation within the given period they may be made one offer only in line with current policy. If they refuse this offer possession proceedings will be commenced (the housing management team will closely monitor this)

3. **Not to offer re-housing** – the housing management officer will write to the applicant advising them that they have a right to appeal against the decision to the service manager for Resident Services, initiate possession proceedings and refer the applicant to the housing advice service to explain how to move in the private sector. The housing management officer's letter will also advise the applicant of the reason for the decision and that, should they experience a significant change in their circumstances, they may request us to look at the decision again (e.g. if the decision was made on solely on the basis that employment income was sufficient to afford shared ownership, and the applicant loses their job).

## **Renewal of Flexible tenancies**

No decision has as yet been taken on who will be responsible for reviewing and taking decisions on the renewal of flexible tenancies, or on the composition of the panel to consider appeals against adverse decisions. The policy will be included in the next amendment to the allocation scheme, before the first flexible tenancy becomes due for review.

## **Current positive residence test**

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

## **Appendix 8 – Assessment of priority for working households**

This appendix was removed on 01/12/2015 following an amendment to the allocations scheme. See appendix 18 section 8

## Appendix 9 – List of tables in the scheme

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## Appendix 10 – Financial resources

### Assessment

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

- Disqualified, but able to access alternative housing options

or, in exceptional circumstances:

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

### Financial Assets

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

### Property owners

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

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

In determining whether an applicant is eligible to receive an allocation of housing, the Council will consider the following:

- Whether the applicant can sell their current home.
- The expected equity after the proposed sale of the property.
- The applicant’s current financial circumstances and commitments
- Whether the applicant will be eligible for a mortgage.
- The supply of economically realistic accommodation suitable for the applicant’s specific needs on the private market for either sale or rent
- Whether the applicant’s housing need can be met in the private market, taking into consideration the cost of housing in and outside of Harrow.

- Whether adaptation of the present property is a viable option. Whether significant care and support needs would impact on the ability of the applicant to secure and maintain accommodation.

Where the Council agrees to assist a home owner with re-housing, the applicant must undertake to place their home on the open market immediately. They may not rent their home or make any financial gain while waiting to sell.

### Savings

Any applicant with savings over £30,000 ♦(in line with the threshold for child tax credit qualification) will not be eligible for public rented housing as they will be deemed to have enough financial resources to rent in the private sector. Deliberate disposal of assets in order to become eligible for an allocation will disqualify an applicant.

### Income

Applicants with gross incomes (including notional income from capital assets but disregarding disability benefits) in line with or above the income required for low cost home ownership (including shared ownership ♣) properties by bed size will not be offered public rented housing. This is because they are deemed to have sufficient financial resources to enable the applicant and their household to find other suitable accommodation. The following household income eligibility limits are (as at Dec 2016) an absolute income cap; that is anyone earning above these limits (including notional income from capital assets but disregarding disability benefits) would be expected to move either to rent or buy independently.

Maximum joint household income to qualify for housing				
Bed size	Shared ownership full market value	5% deposit on 25% share purchased	Minimum gross household income required to purchase minimum share of 25%	Maximum joint gross household income to qualify for public rented housing
1 bed flat	£240,000	£3,000	£28,000	£32,000
2 bed flat	£310,000	£3,875	£34,250	£40,250
3 bed flat	£370,000	£4,625	£42,000	£50,000
4 bed flat	£435,000	£5,438	£50,500	£66,000

NB: To check whether income is above the limit it will be necessary to check the Allocations Scheme on the Harrow website as the limits will be reviewed and updated every 2 years.

♦The figures are as of Dec 2016. The Council will review the financial limits at least every two years, to consider if they still apply, and will take into account any significant changes in: house prices in the borough, income level, the availability of affordable home ownership properties and private rents.

♣Shared ownership requires an absolute minimum income of £17,000, together with savings of at least £3,000 for legal fees and surveys etc. There is usually also a requirement to have at least 10% deposit in place for the value of the share to be purchased, so at least another £4,000 to £10,000 depending on the value of the property and the share on offer. Visit the Low Cost Home Ownership page on the Harrow website at [www.harrow.gov.uk](http://www.harrow.gov.uk) for more information

### **Important Note**

Intentional unemployment in order to become eligible for an allocation will disqualify an applicant. The Council will not make an allocation where, upon verification, we determine that an applicant can afford a mortgage to buy or part-buy a property by using their assets and income.

In assessing “intentional deprivation of assets” the council will follow Department for Work and Pensions (DWP) guidelines wherever possible.

## **Appendix 11 – Housing application assessment process**

### **Registration**

If the officer assessing the incoming application is satisfied that the applicant is eligible for housing they will make an initial assessment based on the information on the application form and any other information available, usually within 28 days. In some cases the application may be activated automatically from the information given on the form. If the application does not qualify for registration, the applicant will be sent a LIN number and a letter explaining the reason(s) for disqualification and, if the applicant lives in Harrow, how to access targeted online housing options and advice, as stated in sections 7.7 and 7.8 of the scheme. If the application does qualify for priority on the scheme, the system or the officer will register the application in the appropriate bedroom category and in one of the five priority bandings with the priority date being the date of registration. If, in order to confirm high priority, they need to check identification documents or supporting information such as medical evidence, or carry out a home visit, they will do this before registering the application, so these cases may take a little longer. We will write to applicants to tell them if their assessment is likely to take longer than 28 days and the reasons for it.

### **Decision letter**

We write to all those who have been assessed as eligible with:

- the Locata Identification Number (LIN)
- the assessed band and the reason for it
- the right to request a review if you consider any of your registration details to be inaccurate (see Appendix 4 for review procedure)
- how to access alternative housing options via the Locata website.

In addition, if assessed as band A+, A, B, C or C- (initial preference), we advise the applicant of:

- how to bid for homes using the Locata website the priority date
- the maximum bed size for which the applicant can bid mobility group (physical disability level) if applicable

The preferred means of communication as stated on the application form will be used to communicate with the applicant (i.e. e-mail or posted letter).

### **Banding appeal**

If the applicant does not agree with their band or priority date they should first discuss the matter with a housing options officer, whose job it is to make sure that applicants fully understand how their banding has been assessed. It may be, for example, that we need more information in order to make a more accurate assessment. If the applicant remains dissatisfied with the decision they have a right to ask for a review to be carried out by our reviewing officer, who is someone senior to the person who made the decision and who was not party to making that decision. Before asking for this, however, we make applicants aware that the reviewing officer has the authority to lower as well as increase a band (see Review Procedure at Appendix 4).

### **Keeping an application up to date**

Applicants must keep the housing department informed of any changes in their circumstances, e.g. when they move house, have a baby, or someone leaves or joins their household by logging into their Locata account and completing an online change of circumstances form. If this results in a band change we will inform the applicant in writing of the new band, the reason for it and the applicable priority date, and of their right to request a review of the decision (see Appendix 4 on the review procedure). Failure to tell us about a change in circumstances which would boost priority means the applicant may miss out on an offer of housing. Conversely, failure to advise us of changes (such as a member of the household leaving) may result in an offer being withdrawn on the basis that we gave a higher priority than the applicant was entitled to.

### **Checks before offers of housing**

*We always carry out a full verification check before confirming any offer and allowing a tenancy sign-up to take place. See Appendix 6 which explains the verification process. If, as a result of our inquiries, we believe that an applicant has knowingly withheld information with the intention of obtaining a public rented tenancy we may decide to prosecute for fraud.*

## **Appendix 12 – Debts and arrears policy**

### **All applicants**

No offer will be made to an applicant, even one who is owed the statutory reasonable preference, who owes the council or a partner housing association money (either rent, service charges, council tax or any other debt) and has refused to make, or has failed to keep to for a minimum of 6 months, an agreed repayment arrangement to repay the debt and has not paid off at least 50% of the original debt.

### **Accepted Homeless Households in temporary accommodation**

Homeless households in Council-provided temporary accommodation will be advised that, if they fall into rent arrears, their bids on Locata will be rejected until such time as the arrears are cleared or an agreement has been reached to clear the arrears and this agreement has been kept to for at least 6 months and at least 50% of the original debt has been paid off

This policy will also apply when the applicant either:

- refuses to pay the rent, or
- fails to make a commitment to repay arrears, or
- fails to provide supporting information for a Housing Benefit claim.

Depending on the amount of the arrears and the nature of the agreement, discretion will be exercised to review cases and make the applicant eligible for an offer earlier or later than six months. Exceptions can be agreed by a team leader in the housing needs team to this policy, particularly for those cases in bands A+ or A.

### **Tenants**

Tenants, like homeseekers, are allowed to be members of Locata even if they have rent arrears. However, at the time that they bid for a property they must have a clear rent account. Their bids on Locata will be rejected until such time as the arrears are cleared or an agreement has been reached to clear the arrears and this agreement has been kept to for at least three months. Consideration will be given to varying this rule where other exceptional circumstances apply such as:-

- Tenants with rent arrears and urgent management, medical or social hardship priority in band A+ or A may be transferred at the discretion of the service manager responsible for tenancy management. In most cases, tenants will be less than 10 weeks in arrears or on Housing Benefit and have been reducing the arrears regularly for at least six months, or the urgency of the case is considered to warrant a move despite the arrears
- Tenants who need to move because they are underoccupying their current home or where a permanent decant is essential may be transferred despite rent arrears. Tenants in arrears who qualify for a tenants' underoccupation incentive payment will be transferred with the payment offset against the arrears.

## Appendix 13 Processing applications from people over 60 years of age

Members may indicate on the application form if they wish to be considered for sheltered accommodation. Relatives, social workers, or doctors may also refer them, or the Council's Medical Adviser may recommend sheltered accommodation.

Following registration a home visit is arranged for verification (see **appendix 6, Verification**).

The sheltered assessment officer will carry out a Sheltered Assessment, setting out, in detail, the member's ability to manage independently, any medical problems and how these may affect day to day activities, their present living conditions and any difficulties experienced in the accommodation.

At the home visit the member is asked if they are interested in other Locata partners' areas or in other areas of London or the country.

The sheltered assessment officer evaluates the Sheltered Assessment, taking into account the advice of the Council's medical advisor if applicable, and recommends that the applicant is either suitable or not for sheltered accommodation. Those who appear to need a higher level of support and or care are referred to the Social Services Elderly Care Management Team for an assessment of their suitability for extra care sheltered housing or Residential Care.

If members express an interest in sheltered accommodation outside west London, following agreement the completed assessment is sent to the relevant authority to decide if they are able to assist.

The housing options officer will advise members about Locata and explain how to bid and, if the person needs it, bid for properties on their behalf.

Members agreed for sheltered housing will be placed in band B unless there are other particular reasons to re-house which qualify them for a higher band.

Elderly members who do refuse to consider sheltered accommodation will be disqualified unless they qualify for a higher band for other reasons.

## **Appendix 14: Legally not defined as lettings and therefore not necessary to be covered by the allocations scheme**

1. An offer of accommodation to a tenant of Harrow Council who does not meet any of the grounds for priority in this scheme (such lettings will be very infrequent and justification for any such lettings will be noted on the tenancy file).
2. Statutory succession and assignment of a tenancy to the successor on the tenant's death (the procedure for making a non-statutory succession decision is described in appendix 7).
3. Assignment of a tenancy by way of mutual exchange.
4. Transfer of a tenancy by Court Order under family law provisions or under the Civil Partnership Act 2004.
5. Council initiated transfers (e.g. decanting to alternative accommodation to allow for major works to take place). Permanent (but not temporary) decants are normally done through the allocations scheme, but do not have to be if it is in the council's interest, especially in cases where the applicant refuses to co-operate in making an application to move.
6. Re-housing required because the council is displacing a person from their accommodation or needs to re-house them pursuant to the Land Compensation Act 1973.
7. A person being granted a family intervention tenancy.
8. Provision of non-secure temporary accommodation in discharge of any homelessness duty or power.
9. Lettings made by housing associations outside their nomination agreements with the council.
10. Allocations to individuals subject to the Multi Agency Public Protection (MAPP) arrangements (although we will usually assess according to the priorities set out in the scheme and make the person a direct offer, as per section 23 of the allocations scheme).
11. Offers of tied accommodation to council employees.
12. Urgent management transfer cases (although we will allow such cases to exercise choice wherever practical before making them a direct offer, as per section 23 of the allocations scheme).
13. Contractual duty to re-house council employees in tied accommodation (although we will allow such cases to exercise choice wherever practical before making them a direct offer, as per section 23 of the allocations scheme).

## **Appendix 15 – Lettings to staff, Board members of relevant organizations, council members, and relatives**

The following procedure must be undertaken to ensure that any lettings can be justified under a high level of scrutiny.

1. The housing applicant must have no direct input into any decisions about their re-housing. This includes no inputting of any data about their application into the housing needs databases nor assessing their own level of priority.
2. Staff members must not have any involvement in the inputting of application data or assessing priority for a relative.
3. Applications should be clearly marked on the housing databases that this is a staff member, board member, councillor or relative of any of these. The team leaders in the housing assessment team will keep a confidential record of all such marked applications.
4. When such an applicant has bid for a property and is showing near the top of a bidding list, or is to be made a direct offer, a “record of interest” note must be completed and signed off before any offer is made. The details of the offer must be scrutinised and signed off by the service manager responsible for housing assessment or housing provision.
5. Attached to the note must be copies of the computer screens of all appropriate information, including the Locata advert, the date the property was advertised, the shortlist from which the applicant is being offered, and any policy evidence for any applicants above them not being made the offer.

## Appendix 16 – Chart of bands, band reasons, priority dates, time limits and refusal consequences

Reason for band A+	Description of band A+ priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
<b>Band A+ Emergencies and underoccupiers</b>				
<b>Guideline waiting time: 0 bed &amp; sheltered = 2 months, 1 bed = 3 months, 2 bed = 4 months, 3 &amp; 4 bed = 6 months</b>				
Emergency medical (group 1 emergencies)	Exceptional circumstances when the applicant or a member of their household has a life threatening condition which is seriously affected by their current housing. OR: Housing conditions and/or other circumstances are having such a major adverse effect on medical condition or disability of the applicant or a member of their household as to warrant emergency priority	Date approved as an emergency	We expect most medical & welfare emergencies to be re-housed within 3 to 6 months maximum. If there is a failure to bid, failure to attend a viewing or a refusal of a reasonable offer, one direct offer of housing will be made (see section 23)	Downgrade to band A if direct offer is also refused (groups 1 & 2).
Severe need (group 2 emergencies & group 21)	Exceptional circumstances and/or multiple needs which warrant emergency priority, including risk of imminent significant harm to children or vulnerable adults.  Ex-service personnel who qualify in band A, if they have urgent housing needs.			
Emergency management transfer ( <i>transfers only</i> ) (group 12 emergencies)	Exceptional circumstances because of significant and insurmountable problems associated with the tenant's occupation of the home <i>and</i> imminent personal risk to the tenant or a member of their household if they remain there (e.g. because of harassment). These transfers will be to properties of the same size and type (i.e. management transfers are always "like for like" – i.e. same number of bedrooms and flat to flat or house to house)			(Management transfers group 12) downgraded to band C if direct offer is also refused.

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Reason for band A+	Description of band A+ priority reason	Relevant priority date	Time limits for	Consequence of Refusal
Enabling adoption or fostering (group 10)	Where agreement has been reached to provide public rented housing on the recommendation of Children's Services as suitable to adopt or foster one or more children. In order to do this they need more appropriate housing but do not have the means to source the accommodation themselves. In these cases we will offer flexible tenancies which are unlikely to be renewed if fostering ceases.	Date of approval/referral.	Normally 3 – 6 months. We will make a direct offer if there is a failure to bid, view or accept offers	Downgrade to band C if direct offer is refused
Underoccupation ( <i>transfers only</i> ) (group 7)	Applicant is willing to move to a property with fewer bedrooms or needs to downsize because their home is no longer affordable. They <i>may</i> be eligible for the Underoccupation Incentive Scheme♣	Date applied to downsize	No time limit	No refusal penalty♥
Tenancy succession/occupiers holding over (group 11)	Those without a right of succession and those occupying property of which they are not the tenant, if approved jointly by the tenancy management and housing assessment service managers for an offer of suitable alternative housing (see Appendix 7 on the assessment process for this).	Date approved for re-housing	We will make a direct offer if there is a failure to bid, view or accept offers	Possession proceedings will be commenced usually after 3 - 6 months

♣If the applicant requests we may be able to re-house them and their adult child separately (for example if they need 2 bedrooms and live in a 3-bedroom home we could re-house in two separate 1-bedroom homes and give the tenant underoccupier priority for giving up 1 bedroom)

♥If the applicant is moving because of unaffordability (because of the "bedroom tax" for public sector tenants on benefit) and gets into arrears, or their arrears increase, following a refusal or failure to bid, one direct offer will be made and notice of seeking possession issued if this is refused. Priority will remain A\* until re-housed, evicted, or the arrears are cleared.

Reason for band A	Description of band A priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
<b>Band A Urgent and high priority cases</b> <b>Guideline waiting time: 0 bed &amp; sheltered = 4 months, 1 bed = 6 months, 2 bed = 1 yr, 3 bed = 2 yrs, 4 bed = 3 yrs</b>				
Medical hardship (group 1)	<p>Other than emergencies and cases of exceptional multiple need, reasonable preference for housing will only be given where current housing conditions are having a <i>major</i> adverse effect on the medical condition or disability of the applicant or a member of their household.</p> <p>N.B. Medical priority will not apply where the effect of housing conditions on health is comparatively moderate, slight or variable, because the prevailing housing conditions in Harrow find many people in that position without a need for public rented housing being</p>	Date medical information submitted that warrants a band A assessment.	Time taken to re-house will vary according to bed size & adaptations needed – not normally longer than 3 yrs in band A	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will result in downgrade to band C.
Severe social hardship (group 2)	<p>Multiple welfare needs that warrant high priority.</p> <p>Social care services or police/ probation or other welfare agency referral agreed by a housing assessment team leader for an urgent move in order to give or receive care and support as part of a care plan, because of a risk to a vulnerable person's independence in the current accommodation, or other social welfare reasons.</p>	Date all relevant information submitted that warrants a band A assessment.	In cases of risk of harm we will make a direct offer if failure to bid, view or accept offers.	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will mean downgrade to band C

Reason for band A	Description of band A priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
Overcrowding and high priority hardship (transfers only) (group 3)	<p>Overcrowding - reasonable preference for housing will only be given where overcrowding is severe, as defined in Section 21.2. This is because, in the prevailing housing conditions in Harrow, many people lack a bedroom without a need for public rented housing being indicated.</p> <p>High priority hardship -with dependent children and living in insecure accommodation with no bedroom and lacking or sharing amenities.</p>	<p>Date the tenant became severely overcrowded ♥.</p> <p>Date all relevant information submitted that warrants a band A assessment.</p>	We will review any case not re-housed within the expected timescale.	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will mean down-grade to band C.

♥The date cannot precede the date the applicant actually made a transfer application.

Reason for band A	Description of band A priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
Statutory overcrowding ( <i>transfers only</i> )	Statutorily overcrowded as defined in Part X of the Housing Act 1985, the proviso that household members over 20 will not count towards the assessment unless they are giving or receiving care (see section 21 on overcrowding) OR Court order to re-house	Date the tenant became statutorily overcrowded or court order issued	We will make a direct offer if there is a failure to bid, view or accept offers	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will result in downgrade to band C.
Unsanitary conditions	The applicant lives in a private sector property that the council's environmental health team has determined poses a category 1 hazard under the Housing Health and Safety Rating System and the council is satisfied that the problem cannot be resolved by the landlord within 6 months, and that continuing to occupy the accommodation will pose a considerable risk to health of the applicant or one of their household.	Date the applicant reported the property to Environmental Health	We will review any case not re-housed within the expected timescale	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will mean down-grade to band C.

Reason for band A	Description of band A priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
Releasing adapted property or making the best use of adapted stock ( <i>transfers only</i> ) (group 9)	<p>At the council's discretion where there is an unmet need for the property occupied – e.g. where the tenant does not require walk-in shower or other wheelchair accessible features.</p> <p>Where the current property needs major adaptations in order to meet the household's needs and it is in the council's interest for the tenant to move.</p>	Date of transfer application or date the occupant with a disability deceased/ moved out.	We will review any case not re-housed within the expected timescale for the bed size.	No refusal penalty unless a direct offer is made to a tenant who needs adaptations, in which case demotion to band C will be considered.

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♣ Provided Harrow has not decided to refer to another authority under S.198 of the 1996 Housing Act.

♦ The date cannot precede the date of the homeless application unless the applicant already had band A for some other reason when they started working full time.

Reason for band A	Description of band A priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
Council interest transfers - Permanent decants (group 13) - Non-emergency management transfers (group 12) - Service tenants (group 14)	<p>Decanting needed from a property imminently required because of lease expiry or for essential works and the tenant will not be returning (e.g. development schemes)</p> <p>Agreed by the service manager for tenancy management for non-emergency transfer. These transfers will be to properties of the same size and type (“like for like” – see Section 19.3)</p> <p>Ex-service tenants (e.g. caretakers and sheltered wardens) where the council has a contractual obligation to re-house.</p> <p>Tenants on a flexible tenancy where it is decided that they still need public rented housing, but in a different property from their current home (see Appendix 7 on the assessment process for this).</p>	Date approved for re-housing	We will make a direct offer if there is a failure to bid, view or accept offers, or if there is a need for the property to be handed back before bidding is likely to be successful	Possession proceedings will be commenced usually after 3 - 6 months
Ex-tenant discharged from institution (group 15)	Where a commitment has been made in order to get a tenant to relinquish their public housing tenancy on entering an institution such as a prison or nursing home. The priority will normally only be given for studio and 1-bedroom properties.	Date of application	Normally 3 – 6 months. We will make a direct offer if there is a failure to bid, view or accept offers	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will result in downgrade to band C.

Reason for band A	Description of band A priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
Young people leaving care move-on quota (group 16)	Approved for move-on by Social care Services as part of their annual fixed quota of studio and 1-bedroom properties, provided they meet the eligibility criteria set out in appendix 3.	Date put forward to Housing for the quota	Normally 3 – 6 months. We will make a direct offer if there is a failure to bid,	Failure to bid, failure to attend a viewing or a refusal of 2 reasonable offers will result in downgrade to band C.
Supported housing move-on quota (group 17)	Approved for move-on by the Supporting People Move-On panel (comprising representatives of council accredited supported schemes) as part of their annual fixed quota of studio and 1-bedroom properties.	Date of panel meeting	view or accept offers	
Move-on from residential care (group 18)	Where agreement has been reached to provide public rented housing on the recommendation of a Social care service or equivalent that the person is able to live independently.	Date all relevant information submitted to support suitability for independent living.	Expected to bid regularly and move fairly quickly or risk being downgraded to reduced preference band C	

Reason for band B	Description of band B priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
<b>Band B Standard priority</b> <b>Guideline waiting time : sheltered accommodation 1 year</b>				
Older people approved for sheltered accommodation (group 19)	Applicants (usually 60 years+, but exceptionally 55 years+) who are assessed as likely to benefit (e.g. by retaining their independence for longer) from sheltered or other specialist older people's accommodation.	Date of registration or becoming eligible for older people's housing, whichever is the later	Expected to bid regularly and move fairly quickly or risk being downgraded to reduced preference band C	Failure to bid, failure to attend a viewing or a refusal of 3 reasonable offers will result in downgrade to band C

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Reason for band C	Description of band C priority reason	Relevant priority date	Time limits for bidding	Consequence of Refusal
<b>Band C Non urgent</b> <b>There are no guideline waiting times for this band, as it is difficult to anticipate the frequency with which people in this category will be successful on Locata. This group will always be considered <i>after</i> other property bidders in bands A+, A and B.</b>				
Other homeless people within the meaning of part VII of the Housing Act 1996, including those owed a duty by another borough	<p>Applicants accepted homeless under S. 193(2) or S. 195 (2) of the 1996 Housing Act or S. 65 of the 1985 Housing Act who are occupying emergency accommodation or suitable temporary accommodation provided under the Housing Act 1996 Part VII.</p> <p>Applicants who applied as homeless after 08/11/12, for up to 1 year from the date of discharge of duty into a private rented sector property.</p> <p>Applicants accepted homeless since 30/11/12 under S. 193(2) or S. 195 (2) of the 1996 Housing Act or S. 65 of the 1985 Housing Act who have refused a reasonable offer of private sector housing since they approached Harrow for housing.</p> <p>No duty accepted because not in priority need or because found to be intentionally homeless (verification will be carried out at the time of any offer and, if the applicant is no longer homeless, or has spent some of their waiting time in suitable housing, no tenancy will be offered or, if now homeless again, their priority date adjusted).</p>	date the applicant became homeless ♣	No time limits	No penalties

♣The date cannot precede the date of the homeless application.

Reason for band C	Description of band C priority reason	Relevant priority date	Time limits	Consequence of Refusal
Previously accepted homeless “qualifying offer” applicants (group 6)	Households who were accepted homeless and who have subsequently accepted a <i>qualifying offer</i> allowing them to remain in private sector accommodation after the duty has ceased, The applicant must renew their registration every year and continue to have a priority need in order to retain this priority.	Original priority date when first accepted homeless	No time limits	No penalties
Council & partner housing association debtors	People who owe the council or one of our partner housing associations money– original band can be restored upon satisfying the criteria for arrangements to repay the debt.	Original priority date in band A+, A or B		
Deliberate damage to Property	people who, even though they are owed the statutory reasonable preference, have left their temporary accommodation or public rented housing in such a bad state, as judged on pre-inspection or by failure to allow access for inspection, that the cost of bringing it back to a lettable standard far exceeds the acceptable level of costs that would normally be incurred – if still living in the property original band can be restored upon the tenant making good the damage	Original priority date in band A, B or C		
Serial refusers	One reasonable offer refused (band A* emergencies) Two reasonable offers refused (band A urgent) Three reasonable offers refused (band B reasonable preference)	Original priority date in band A+, A or B		

Reason for band C	Description of band C priority reason	Relevant priority date	Time limits	Consequence of Refusal
Overcrowding and high priority hardship (homeseekers only) (group 3)	reasonable preference for housing will only be given where overcrowding is severe, as defined in Section 21.2. This is because, in the prevailing housing conditions in Harrow, many people lack a bedroom without a need for public rented housing being indicated. With dependent children and living in insecure accommodation with no bedroom or lacking amenities	Date the tenant became severely overcrowded.  Date all relevant information submitted	No time limits	No penalties

Reason for band C- (minus)	Description of band C- (Initial Preference) priority reason	Relevant priority date	Time limits	Consequence of refusal
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### Band C- (minus) Initial Preference

**There are no guideline waiting times for this band, as it is difficult to anticipate the frequency with which people in this category will be successful on Locata. This group will always be considered *after* other property bidders in bands A+, A, B and C.**

Initial Preference	Applicants who are assessed as having a significant housing need – i.e. they fit into one of the statutory “reasonable preference” priorities described in Section 8.1, are living in the borough of Harrow but have not been resident in the borough continuously for the last 5 years.  with an identified housing need to whom the council give reasonable preference, where there has been a deliberate change in circumstances which has resulted in a worsening of a household’s circumstances (for example: moving from suitable accommodation into overcrowded accommodation or inviting other people to join a household and make it overcrowded)	date the applicant registered on Locata  Date all relevant information submitted	No time limits	No penalties
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## Appendix 17 - Confidentiality and Data Protection

The Council treats housing applicants' personal information as confidential in accordance with data protection legislation. In normal circumstances, this information is only disclosed to landlords participating in the choice based letting scheme within Harrow (and outside where applicants bid on cross partner properties) to enable them to consider an application and to determine whether an offer of accommodation can be made. Applicants give their consent to this disclosure in completing the online housing application.

Personal information is only disclosed to other parties with applicants' consent or in exceptional circumstances where disclosure without consent is warranted, defined as follows:

- Where there are over-riding legal, social or public interest considerations, for example, a risk of serious harm to the person themselves or to others if the information is not disclosed, where there is a serious threat to another party's staff or contractors
- Where the information is required by a local authority department or its external auditors to carry out statutory functions
- Where the information is required by the police as part of a criminal investigation (Crime and Disorder Act 1998, Section 115)

Medical information obtained from an applicant's GP or other healthcare staff cannot be passed on without prior consent from the professional(s) involved.

All applicants for housing have the right to see information the Council holds about them, regardless of the date the information was recorded. This extends to their housing application records, and information about members of their family held for the purposes of that application. The right of access covers "personal" information, namely, factual information and expressions of opinion, which relate to a living individual.

In certain circumstances the Council may refuse access. This arises where, for example, the information:-

- may identify a third party and that party has not consented to the Disclosure;
- concerns an individual's health, and disclosure may cause serious harm to the wellbeing of the applicant; or
- is held for the purpose of prevention or detection of crime or in respect of some other legal proceedings

Requests for access to records must be made in writing to the officer dealing with the applicant's case.

# Appendix 18 – Summary of amendments to Housing Allocations Scheme approved by the Council’s Cabinet on 19/11/2015 which took effect from 01/12/2015

## 1. Removal of 5 year residency rule

The 5 year residency rule for applicants who fall into one of the statutory “reasonable preference” categories (see section 8.1) but have not been resident in the borough continuously for at least 5 years has been removed. This group are now assessed as band C- (reasonable preference) on the housing register and be eligible to bid for public rented housing on Locata. This is a new band.

## 2. Change band A\* to band A+

Harrow Council have changed the name of our highest banding from A\* to A+ to give continuity within the bandings, given that band C- has been introduced.

## 3. To no longer give band A priority to households who are overcrowded by 2 bedrooms or more living in the private sector.

Harrow Council no longer gives band A priority to households who are overcrowded by 2 bedrooms or more living in the private sector. They now qualify for band C on Locata if they have resided continuously in Harrow for the last 5 years (band C- if they have not lived in Harrow continuously for the last 5 years).

## 4. To no longer give band B priority to accepted homeless and qualifying offer applicants living outside of the M25 area.

Harrow Council no longer gives band B priority to accepted homeless and qualifying offer applicants living outside of the M25 area and they now qualify for band C on the housing register if they have resided continuously in Harrow for the last 5 years (band C- if they have not lived in Harrow continuously for the last 5 years).

## 5. Changes to the exclusion section of the allocations policy

The following changes (in bold) have been made in the exclusion section of the allocations policy (section 7.5)

*(d) knowingly or intentionally provides false or misleading information (including documentation), fails to disclose relevant information that they are under a legal duty to disclose or withholds information that is reasonably requested in relation to their housing application, or*

The following exclusions have been added to section 7.5:

*(f) has been convicted of a fraud offence, or there is sufficient evidence of an admission of fraud, or an alternative sanction to prosecution is/has been accepted by the applicant in relation to the provision of public sector/local authority services,*

*or*

*(g) has deliberately worsened their circumstances by for example: moving from suitable accommodation into overcrowded accommodation or inviting other people to join your household etc.*

**6. Extension of transitional relief arrangements**

Harrow Council have extended the transitional relief arrangements that were originally given to qualifying applicants when our new allocations was introduced on 22 October 2013, for a period of 12 months. The transitional relief period will continue until the households, who still qualify for transitional relief, are either housed through Locata or their circumstances change.

**7. Change to the debt and arrears policy**

Applicants who owe the Harrow Council or a partner housing association money will not be offered public rented housing unless have kept to an arrangement to repay the debt for a minimum of 6 months and paid off at least 50% of the original debt. Previously applicants had been required to have kept to an arrangement to pay off the debt for 3 months, with no minimum amount paid off.

**8. Removal of the Low income criteria.**

The Council no longer give additional priority on the housing register to working households on low income, in low paid full time employment, with at least one child of primary school age who live in the private sector or in temporary accommodation outside of the borough.  
(Appendix 8 removed)

**9. Increase banding to A+ tenancy succession/unauthorised occupiers - approved for alternative social housing**

The banding for tenancy succession/unauthorised occupiers, approved for alternative public rented housing, has been increased from A to A+ to facilitate a quicker move, as it is in the council interests to move these households as quickly as possible to free up family sized public rented housing..

**10. Increase the options for direct offers of public rented housing**

The Council will make direct offers of public rented housing, where applicable, to make better use of our housing stock or to exercise our homelessness duties.

**11. Cases where there is an urgent need to move and the council are unable to provide a timely offer of suitable public rented housing**

If there is significant risk to health/wellbeing and the household are unable to wait a number of months for an allocation of public rented housing, the council would look to deal with this under homelessness rather than awarding priority on the housing register.

**12. Cases where there has been a deliberate change of circumstances which has resulted in the worsening of a household's housing circumstances**

If there has been a deliberate change of circumstances which has resulted in a worsening of a household's circumstances this will result in a reduction of banding to C-

*.../end...*



## Tenancy Strategy 2012



## **Introduction**

The Localism Act 2011 introduced a number of new flexibilities for local authorities to consider when deciding how to make best use of existing social housing and how to encourage the development of new affordable housing. Alongside this there have also been changes to Housing Benefit rules capping the maximum private rents for which benefit can be claimed, particularly for larger properties, as well as further changes to benefits in general set out in the Welfare Reform Act 2012. As a consequence the Council decided to carry out early consultation with residents from August – October 2011 on how it would respond to the new flexibilities and the difficulties residents were facing due to the benefit changes. This Housing Changes review was reported to Cabinet in December 2011 together with a number of options and a direction of travel was agreed. The Tenancy Strategy sets out the Council's approach to:

- the introduction of flexible fixed term tenancies in Harrow;
- the introduction of Affordable Rents in Harrow

The new strategies and policies within the Housing Changes Review intend to protect residents who most need our support and provide a range of realistic housing options in all tenures. They recognise that because the supply of housing at a low rent for life will never be sufficient to meet all of the priority housing needs in Harrow that residents must consider other options such as renting privately either in Harrow or elsewhere to meet their housing needs.

### **1. Background**

The Localism Act 2011 introduced flexible tenancies. These are fixed term renewable tenancies of not less than 2 years and can be offered to new tenants alongside secure or assured tenancies. It is proposed that the general minimum length of flexible tenancies will be 5 years. A new approach to rents has also been introduced for housing association properties. New build homes and a proportion of relets can now be charged higher rents of up to 80% of market rents.

Existing council and housing association tenants will not be affected by these changes unless they move to a new Affordable Rent property and will continue to enjoy their existing security of tenure and other terms and conditions including the right to buy, succession rights and the right to exchange their tenancy with another secure tenant.

The Act requires every local authority to produce a Tenancy Strategy setting out the expectations for all social landlords in the local area in relation to:

- The types of tenancies that will be granted
- The length of fixed term tenancies when these are granted
- The circumstances under which a particular type of tenancy will be granted
- The process for reviewing tenancies at the end of the fixed term and the circumstances under which a tenancy may or may not be renewed either in the same property or in a different property.

Every social landlord is also required to have a Tenancy Policy. In addition to the above, the Tenancy Policy should contain:

- The way in which a tenant or prospective tenant may appeal or complain about the length and/or type of fixed term tenancy offered and a decision not to renew the tenancy at the end of the fixed term
- How the need of those who are vulnerable by reason of age, disability or illness, and households with children are taken into account including the use of tenancies which provide a reasonable degree of stability
- The advice and assistance to be given to tenants to find alternative accommodation if a fixed term tenancy is not renewed.

The Regulatory Framework for Social Housing in England from April 2012 sets out the specific standards that Registered Providers (RPs) must meet and takes account of the amendments made as a result of the Localism Act. The Tenancy Standard requires RPs to let their homes in a transparent and efficient way and to take account of the housing needs and aspirations of tenants and potential tenants. They must demonstrate how their lettings:

- Make the best use of available housing
- Are compatible with the purpose of the housing
- Contribute to local authorities' strategic housing function and sustainable communities

RP's are also expected to co-operate with local authorities' strategic housing function and their duty to meet identified Local housing needs. This includes assistance with local authorities' homelessness duties, and through meeting obligations in nominations agreements.

This Tenancy Strategy sets out the Council's approach to fixed term tenancies, how these should contribute to making the best use of available social housing and the principles that we expect all social landlords to have regard to when setting out their own Tenancy policies. The intention is to have consistency in social landlords approach to new tenancies so that residents are reassured they will have the same housing offer regardless of who is their social housing landlord in the borough We have combined it with our statement on our approach to Affordable Rents which has also been reviewed and updated. As Harrow Council owns and manages around 5,000 council tenancies we will produce our own Tenancy Policy which will follow the principles set out in this document.

Initial consultation was carried out with local residents prior to the draft Tenancy Strategy being published for formal consultation. Broadly there was support for the introduction of fixed term tenancies for new tenants on the basis this will contribute to making sure that social housing continues to be made available to those who most need it. However the majority of respondents felt that older people and those with disabilities should continue to be offered lifetime tenancies, or at the very least more certainty that their tenancy would be renewed if their circumstances remained the same. The Tenancy Strategy takes into account the views expressed during the initial consultation and has been revised to take account of the views expressed during the formal consultation. The outcomes of all consultation is summarised and available at ...[add link].

## 2. Context

Harrow is an outer London borough with excellent transport links to central London, schools and access to attractive Green Belt and other open space. Along with other boroughs demand for housing is high and this is reflected in the high cost of housing both to buy and to rent privately. Unlike many other boroughs Harrow has a small supply of social housing at only 10% of the total housing stock. Twice as many people now live in the private rented sector (20%) whilst the vast majority (70%) own their homes.

As a result of Housing Benefit changes and the effects of recession many more people have been coming to the Council for help with their housing over the past year. Due to the limited supply of social housing we help most people by assisting them to remain in their current homes or by encouraging and assisting them to find alternative housing in the private rented sector. It is becoming increasingly important that our small supply of social housing is used to its full potential to provide homes for those in the highest priority housing need. Whilst the introduction of fixed term tenancies is not likely to produce significant numbers of additional social housing for relet it will help us to target social housing at those who most need it and makes an important contribution alongside other initiatives such as those to encourage underoccupiers to downsize.

You can find more information on the facts and figures supporting this strategy at:

[http://www.harrow.gov.uk/info/200003/housing\\_policies\\_and\\_planning\\_for\\_housing/2522/housing\\_evidence\\_base](http://www.harrow.gov.uk/info/200003/housing_policies_and_planning_for_housing/2522/housing_evidence_base)

## 3. Objectives

This strategy supports a number of our overarching objectives approved by Cabinet in December 2011 as follows:

- **Deliver excellent services shaped and valued by our communities** – we have developed this strategy in consultation with the community
- **Increase the supply of housing, including locally affordable housing and make best use of the existing social housing stock** – whilst we aim to build as much additional affordable housing in Harrow as we can we know this will never meet all needs and therefore our existing social housing stock must be targeted at those who most need it
- **Continue to tackle homelessness by improving access to, and improving standards in the private rented sector** – the tenancy strategy should support and complement initiatives that promote economically realistic housing options in the private sector
- **Enhanced housing options, promoting mobility and choice** - supporting households to consider the economically realistic housing option that best meets their current housing need and to think about what that might be in the future
- **Supporting sustainable and viable communities** – this strategy should contribute to tenancy sustainment and the promotion of employment and training opportunities

so that tenants are supported in adapting to the changing welfare benefits environment and the most vulnerable households are protected and supported in their home.

#### **4. Who should be given which type of tenancy**

The Council supports the use of introductory or probationary tenancies followed by fixed term tenancies for the majority of new tenants. They will help us to ensure that our scarce social housing stock is used in the best way to help those most in need.

We have consulted on the best way to balance the need to make the best use of our stock whilst protecting those households who most need our support and whose circumstances are highly unlikely to change in the future and/or not to penalise existing secure tenants who may need to move.

**We recommend** all new tenancies to be flexible fixed term tenancies, except for:

- (i) older people moving into sheltered or extra care housing, older people who have reached state retirement age and are moving to a smaller property; and
- (ii) underoccupiers of state retirement age moving to a smaller property,

who should be granted life time tenancies and for automatic renewal in certain other circumstances.

The circumstances for automatic renewal are set out in section 7 – Tenancy Reviews (page 6). We would also recommend that secure tenants transferring or mutual exchanging, including through the Housingmoves scheme, to an Affordable Rent property should be offered a life-time tenancy.

The reason for this recommendation is that there may be situations where for example someone no longer needs a specialist or adapted property and the granting of a lifetime tenancy in all circumstances would prevent making best use of the property. Automatic renewal where the need remains still provides the necessary certainty of support to vulnerable households.

#### **5. Minimum length of Tenancy**

The council supports the offer of an introductory or probationary tenancy followed by a minimum 5 year tenancy period in most circumstances where a fixed term tenancy is being granted. We consider that a 5 year tenancy offers reasonable security to most households and is considerably more secure than the average initial tenancy granted in the private sector. In addition, we expect the majority of fixed term tenancies will be renewed because people's circumstances have not changed materially, for example the household income has not increased and there is no other more economically realistic affordable housing option and/or the household size still matches the size of property. However, reviewing the tenancy periodically will enable tenants to consider what other housing options there are or might be in the future and to discuss other opportunities for example relating to employment/training initiatives.

The Localism Act allows the granting of shorter tenancies of no less than two years in exceptional circumstances. The council does not generally support the granting of a shorter tenancy period in any circumstances other than those specified below.

- Where a shorter tenancy period is required to enable redevelopment to take place
- In any of the circumstances under section 7 when considering renewal of a tenancy the tenant could move to another property but it would be unreasonable to enforce it at this time

## **6. Succession**

There is an automatic right for a spouse or partner of a tenant to succeed to a fixed term tenancy, but this can only happen once. Social landlords have the discretion to grant additional successions. In view of the limited amount of social housing in Harrow the Council supports discretionary succession only in the following circumstances:

- Where a family member<sup>1</sup> has been part of the household for at least 5 years or where a full time carer (who is not a family member or employed as the carer) gave up accommodation to care for a minimum of 12 months, the property meets their housing needs and no alternative economically realistic housing option exists. In the situation where the property is larger than the needs of the family member or full time carer a suitable alternative economically realistic housing option may be the offer of a suitable social housing property on a flexible tenancy. A succession to a flexible fixed term tenancy should only be granted for the remainder of the life of that tenancy and renewal subject to a review when the end of the tenancy is due.

## **7. Tenancy Reviews and advice and assistance when a tenancy might not be renewed**

The tenancy review should primarily be an opportunity for both landlord and tenant to consider if the current home still best meets the tenants needs and how it might be possible to meet future aspirations for example for home ownership by discussing low cost home ownership options available, savings for deposits etc and by offering advice and guidance to non working households on national and local employment and training initiatives. Based on our evidence we expect the majority of tenancies to be renewed and we also want our strategy to contribute to the continuation of mixed and balanced communities and prevent unnecessary churn and upheaval.

We have recommended in Section 4 that all new tenancies are granted as fixed term tenancies but are automatically renewed in the following circumstances:

- The tenants are of state retirement age and living in a 1 bedroom general needs property;
- The tenant(s), their spouse or partner or a dependent child is disabled validated by means testing for disability benefits;
- The tenant(s), their spouse or partner or a dependent child has a severe learning disability or severe enduring mental health need validated by the relevant officer in the Council's Community, Health and Wellbeing directorate;
- The Tenant was a Care Leaver and is still receiving support from the Council.

The Council expects the following principles to be taken into account when considering whether to renew the tenancy:

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<sup>1</sup> The definition of family member is all those individuals defined as family members under s.113 of the Housing Act 1985 as amended.

- The property should not be larger than the current housing needs of the tenant and their household<sup>2</sup>. An examples of where the property is no longer suitable might be if the property is under-occupied by one-bedroom or more and an alternative suitably sized property is being offered, the property has been extensively adapted but for someone with a disability who no longer lives with the tenant and an alternative property is being offered. In these circumstances it would be reasonable not to renew the tenancy so that the property can be let to someone who needs it. Other considerations to be taken into account with regard to the suitability of alternative accommodation might include specific individual circumstances and access to family support networks;
- The tenant's household income is sufficient to enable the tenant and their household to find other suitable accommodation either by moving into intermediate housing (low cost home ownership or sub market rent), private rented or buying on the open market. We propose using the following household income eligibility limits as an absolute income cap, that is anyone earning above these limits (including notional income from capital assets but disregarding disability benefits) would be expected to move independently into intermediate housing or the private sector either to rent or buy:

<b>Household Size</b>	<b>Income Limit</b>
1 bed	£30,000
2 bed	£38,000
3 bed	£48,000
4 bed	£60,000 <sup>3</sup>

The information used to calculate these limits is attached at Appendix 1 and will be reviewed and updated annually.

A financial assessment should be carried out for applicants earning below these limits to determine what other affordable housing options are available;

- The tenant's household has assets or savings greater than £24,000. The proposed income and savings limits are the same as will be proposed in the Councils revised Housing Allocations Scheme which would normally exclude them from being granted a tenancy;
- The tenant has breached the terms of their tenancy and failed to reach or maintain an agreement with the Council or their landlord to remedy this breach. For example there are rent arrears and the tenant has not agreed to maintain an agreement to clear these or there has been serious and persistent documented anti-social behaviour.
- The tenant or a member of the household has a conviction for civil disturbance carried out in the locality of Harrow or other criminal activity such as housing fraud.

<sup>2</sup> The definition of household is the tenant(s) and all those reasonably expected to reside with them

<sup>3</sup> The income limits have been calculated with reference to local rents and on the basis that housing costs should not exceed 30% of gross income

We would expect the review to take place at least 9 months before the tenancy is due to come to an end to allow sufficient time for a tenant to find alternative housing if the tenancy is not renewed and alternative accommodation is not to be provided.

We recognise there may be circumstances where it might be considered unreasonable to expect someone to move even if one of the above criteria apply and would recommend allowing a tenancy to continue if:

- The tenant or a member of their household is suffering from a terminal illness;
- The tenant has children attending a local school at key stages of education, specifically in year 10/11 or year 12/13 and no economically realistic alternative housing is available locally.
- The tenant is a foster carer and the tenancy needs to continue to enable them to fulfil this role;
- The tenant is participating in a Tenancy Sustainment Programme or a training and employment programme and moving at this stage would prevent the tenant from completing the programme;
- The tenant makes an active and positive contribution to their local community, through for example volunteering for an approved organisation on a regular weekly basis.

In any of the above circumstances it may be appropriate to offer a shorter tenancy renewal of at least two years or a further five year tenancy depending on individual circumstances.

Given the Council's intention to prevent homelessness wherever possible and to ensure that appropriate economically realistic housing options are available to people in housing need it would be pointless for landlords not to renew tenancies unless they have carried out the review thoroughly including offering appropriate proactive advice and assistance to find alternative accommodation. Options for alternative housing could include home ownership either outright or through the various First Steps initiatives or other government initiatives, a privately rented home either in Harrow or elsewhere or a more suitable affordable rented home either in Harrow or elsewhere. We would also expect appropriate advice on employment and training initiatives to be provided to non working households including young adults who form part of the household.

Where a Tenancy Review is being carried out with a vulnerable household, such as a Care Leaver or other vulnerable adult appropriate support arrangements should be made such as use of an advocate or advocacy service.

Although it is clear in the Localism Act 2011 that it is the responsibility of the landlord to provide the advice and assistance the Council already provides a comprehensive service locally to all applicants for affordable housing including advice and assistance on finding suitable private rented accommodation, and can therefore be contracted to provide this service. The Council will be using this service to provide advice and assistance where it does not renew fixed term tenancies. For details of the service available please contact Jon Dalton by emailing [jon.dalton@harrow.gov.uk](mailto:jon.dalton@harrow.gov.uk) or phoning 020 8416 8647.

As the Council retains the statutory responsibility to provide housing for priority homeless households we want to ensure that a robust approach is taken to advice and assistance where a tenancy is not renewed and we would ask all social landlords in Harrow to:

- Notify the Council when a tenancy is not to be renewed and of the agreed alternative housing arrangements;
- If not making use of the Council's advice and assistance service (which is our preferred option) to provide details of the advice and assistance provided.

## **8. Reviews and Complaints**

All social landlords are required to set out the way in which a tenant or prospective tenant may seek a review of or complain about the length of the fixed term and the type of tenancy offered and against a decision not to grant another tenancy on the expiry of the fixed term. The Council expects Registered Providers to ensure their Tenancy Policies:

- State how and to whom review requests should be made eg to a senior officer not involved in the original decision
- Give timescales in which the review will be dealt with
- State how the tenant can take their complaint further if they are dissatisfied with the response eg to Housing Ombudsman or by way of judicial review and where they may get independent advice
- Be accessible and widely publicised eg published on websites, available in housing offices, local community buildings etc

The Council would also be able to carry out independent reviews on behalf of social landlords working in Harrow. Please contact Jon Dalton as detailed in section 7 for further information.

## **9. Affordability**

A key element of the Council's Housing Strategy is to enable the development of additional affordable housing and we recognise that at the current time housing associations have been required to contribute to this by charging the new Affordable Rents (up to 80% of market rents) on new developments and a proportion of relets in order to obtain grant funding. We are concerned that charging the maximum of 80% market rent would mean new homes are unaffordable as a result of welfare reforms, especially for large families. However we also need to take account of the small supply of social housing in Harrow and as a result the majority of households in housing need are now offered private rented sector housing either in Harrow or elsewhere at the Local Housing Allowance market rent.

We produced guidance on our approach to Affordable Rents in May 2011 taking account of the above issues. The guidance supported the continued development of affordable housing in the borough and as a consequence accepted that rents of up to 80% could be charged on 1 and 2 bedroom properties to enable social housing rents to be let on the larger family homes. This resulted in a blended average of rents at 50-55% of market across the average new scheme depending on unit mix.

This approach produced an anomaly on some schemes of rents of two bedroom properties being higher than three bedroom properties making it difficult to encourage households to

downsize. We have therefore reviewed our guidance with RPs and amended the guideline rent levels, taking account of local affordability, for each bed size as follows:

1 bed – up to 80%

2 bed – up to 70%

3 bed – up to 60%

4 bed plus – up to 40% with a suggested guideline maximum of £200 per week subject to individual scheme viability<sup>4</sup>

Our general principles in relation to Affordable Rents are therefore:

- We support the introduction of Affordable Rents on new schemes provided they contribute to the continued development of affordable housing in Harrow;
- Registered Providers must take account of welfare benefit caps and set rents that will be affordable locally;
- We support the conversion of a maximum of 25% of the existing RP stock to Affordable Rents provided they contribute to the continued development of affordable housing in Harrow. However where the conversion of properties with 3 bedrooms or greater is proposed, this will not generally be supported;
- We do not support the disposal of stock which results in a net loss of social housing supply and particularly the disposal of family housing.

Our detailed guidance is attached at Appendix 2.

## 10. Equalities

We have used the outcomes from our consultations and our Evidence Base to complete our Equalities Impact Assessment which is available on the Council's website through the following link: [\[add link\]](#)

## 11. Reviewing the Tenancy Strategy

This strategy will be monitored and reviewed annually. Revisions, such as to the income and savings caps, will be authorised by the Portfolio Holder for Housing.

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<sup>4</sup> £200 guideline represents 40% of universal cap of £500 per week.

## Appendix 1: Income limit Calculation

Income Limits: 18 July 2012

Bed size	Open market purchase				Shared Ownership purchase				Market rent		
	Median House Price	20% deposit required	Mortgage	Gross income required*	Assumed OMV	25% share	10% deposit	Minimum gross income required	Lower quartile rent pw	Lower Quartile Rent PCM	Gross income required
1 bed	£174,650	£34,930	£139,720	£39,920	£195,000	£48,750	£4,875	£26,000	£173	£750	£30,000
2 bed	£286,300	£57,260	£299,040	£65,440	£249,950	£62,488	£6,249	£32,000	£219	£950	£38,000
3 bed	£363,400	£72,680	£290,720	£83,063	£350,000	£87,500	£8,750	£44,000	£277	£1,200	£48,000
4 bed	£471,800	£94,360	£377,440	£107,840	£430,000	£107,500	£10,750	£54,000	£346	£1,500	£60,000

NB. Based on housing costs not exceeding 30% of gross income (which is currently equivalent to 40% of net income where net income is 75% of gross. In 2011 the gross median weekly wage of Harrow residents was £603 (£31,356 per annum) and the gross median weekly wage of Harrow residents working in Harrow was £510 (£26,520 per annum)

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## **Appendix 2**

### **Harrow Council**

#### **Policy on Affordable Rent Development – April 2012**

##### **Introduction**

This Policy Statement updates and replaces the Affordable Housing Framework Position Statement published in May 2011. The original position statement was provided in advance of the deadline for the Homes and Communities Agency 2011-15 bid round.

The interim position provided our Registered Provider (RP) partners with reasonable assurance regarding the levels of open market rent which may be acceptable in Harrow given proposed wider changes to the benefits system at that time. In summary, up to 80% market rent was deemed acceptable on 1 and 2 bedroom properties but that we would ask partners to let 3 bedroom plus homes at existing target rents or as close as possible due to affordability issues.

##### **Changing Policy**

Since the Interim position was published, the Welfare Reform Act received royal assent (8<sup>th</sup> March 2012). The Act puts into law the Welfare Reform Bill and confirms the introduction of Universal Credit.

As a result of changes brought about by the Localism and Welfare Reform Acts, Harrow is reviewing its entire suite of housing policies and strategies to reflect the national changes. An evidence base has been developed to inform the policy changes and this can be found at:

[www.harrow.gov.uk/housingchanges](http://www.harrow.gov.uk/housingchanges)

Issues such as population change, affordability, housing need, the existing housing waiting list etc are examined in detail and inform this Affordable Rent policy.

The Affordable Housing Delivery Group was consulted in February 2012 regarding the need to review the Interim position on Affordable rent levels. The main conclusion from the consultation was that many of the RPs had adopted similar approaches to Harrow based on their own research. It was considered that an element of flexibility should be allowed from the original interim guidance, particularly in relation to the anomaly between 2 and 3 bed rent levels, so that priorities such as retaining affordable housing supply could be properly balanced with issues relating to affordability and the range of market rents across bedsizes and across certain areas in the borough..

##### **Rent Levels in Harrow**

Rents have been reasonably static across the borough over the last year. Clearly there are variations across the various postcodes in the borough with Stanmore being the most expensive area and Harrow Weald generally being the cheapest in general.

The table below sets out private market rents across Harrow as at April 2012. This information will be updated regularly in the housing changes evidence base which can be accessed through link provided earlier.

	<b>Market Rent</b>	<b>80% Market</b>	<b>LHA</b>	<b>Existing Social Rent</b>
<b>1 bed</b>	<b>£187</b>	<b>£149.60</b>	<b>£173.08</b>	<b>£100</b>
<b>2 bed</b>	<b>£233</b>	<b>£186.40</b>	<b>£219.23</b>	<b>£115</b>
<b>3 bed</b>	<b>£300</b>	<b>£240.00</b>	<b>£288.46</b>	<b>£133</b>
<b>4 bed +</b>	<b>£381</b>	<b>£304.80</b>	<b>£346.15</b>	<b>£141</b>

The above is based on local comparables at April 2012 which will be updated regularly.

### **Affordability in Harrow**

It is recognised that adopting a one size fits all approach to household affordability is difficult given the complexity of the universal cap for working and non working households.

#### For those in receipt of benefits

Changes to the benefit system through the universal benefit reform limit the amount non working households can claim to a maximum level of £26,000 per annum or £18,200 for single households. This figure includes housing benefit.

We estimate that around 90-95% of those in priority need on the housing waiting list are in receipt of benefits of some sort and are currently undertaking work to determine the number of households who are completely economically inactive, the results of which will be set out in updates to the housing changes evidence base

The table at Appendix 1 of this briefing demonstrates the effects of these changes on various household sizes and shows that family sized housing at 80% market rent is not affordable in Harrow to those in receipt of benefit and classed as non working.

#### For working households

The affordability measure in use by the HCA and the GLA ranges from a maximum of 40-45% net income to be spent on housing costs depending on tenure.

CACI data for the borough shows that the total average equivalised household income in the borough in 2010 (latest available) was £30,827. This data also shows that around 38% of households in Harrow have a household income of less than £25,000 per annum. The table below shows the minimum household income required for households at the LHA limit and 80% market rent for each bedsize in Harrow (as at April 2012) using 40% net income as the affordability measure.

	LHA Cap (pw)	Per Annum	Min Net Income Required	Min Gross Income (if Net income = 75% Gross)
1 bed	£173.08	£ 9,000.16	£22,500.40	£ 30,000.53
2 bed	£219.23	£11,399.96	£28,499.90	£ 37,999.87
3 bed	£288.46	£14,999.92	£37,499.80	£49,999.73
4 bed	£346.15	£17,999.80	£44,999.50	£59,999.33

	80% Market (pw)	Per Annum	Min Net Income Required	Min Gross Income (if Net income = 75% Gross)
1 bed	£149.60	£ 7,779.20	£19,448.00	£25,930.67
2 bed	£186.40	£ 9,692.80	£24,232.00	£ 32,309.33
3 bed	£240	£12,480.00	£31,200.00	£41,600.00
4 bed	£304.80	£15,849.60	£39,624.00	£52,832.00

### Guidance to RPs on the implementation of the Affordable Rent model in Harrow

Taking into account the affordability issues outlined above and the size of the social housing stock in Harrow, our approach is set out below. We stress the importance of RPs continuing to talk to us at an early stage about their proposals so that we can find solutions that enable affordable housing development to continue that will meet priority local needs.

- RPs should continue to have regard to Harrow’s policies which encourage the development of affordable housing and in particular 3 bed plus family sized housing, wheelchair housing and supported housing which is affordable to those on the Harrow housing waiting list.
- The Council will consider a “hybrid approach” to the new Affordable Rent model which will allow the continued development of affordable housing, including larger homes at lower rent levels alongside 1 and 2 bed homes at higher rent levels where affordability allows. We would stress that the following ranges represent an indication of what may be considered affordable in Harrow but it is highly important that proposed rents are discussed with the Housing Department early in the scheme formation process.

1 bed – up to 80%

2 bed – up to 70%

3 bed – up to 60%

4 bed plus – up to 40% with a suggested guideline maximum of £200 per week<sup>5</sup>

- In the interests of sustainable communities the Council would encourage a stepped approach to rent levels by unit size to ensure that there are no anomalies between 2 and 3 bedroom rent levels. For example it is often the case that if 3 bedroom properties are charged at target rents, a 2 bedroom property on the same development may cost more if charged at 80% market rent. This may fetter the Council’s ability to encourage under occupiers to downsize.

<sup>5</sup> £200 represents 40% of universal cap of £500 per week.

- We will continue to consider shared ownership that is affordable at the current target income levels. The ratio between rented and shared ownership on development schemes will be 60:40 as a starting point as per current planning policy.
- No rents should be higher than the Local Housing Allowance applicable in Harrow.
- There are relatively few relets of existing RP properties in Harrow and, in view of the overall small size of the social housing stock, conversions of existing target rent properties should be no more than 25% of 1 and 2 bed properties. Conversion of larger properties should not generally be undertaken.
- **All conversion proposals should be discussed and agreed with the borough before they are implemented. It is extremely important that RPs discuss this with the borough as soon as a conversion is identified due to the possibility of clashes with policies such as the Under Occupation Strategy. In addition if there is a S106 agreement attached to the scheme this will require properties to be let at target rents and the agreement would need to be varied to enable properties to be let at the new Affordable Rent.**
- Disposal of family homes (3 bed+) should only be undertaken as a matter of last resort, following discussion and agreement with the borough.
- All nominations for Affordable Rent homes will be through the Locata choice based lettings system i.e. similar applicants to existing arrangements.

We encourage RPs to speak to Harrow about proposals for the new Affordable Rent model as early as possible in the formation of development proposals. Early dialogue will ensure that proposals can be assessed in line with overall priority and agreed accordingly from the outset.

For further information please contact the Enabling team:

Elaine Slowe (Housing Enabling Manager) on 020 8420 9229 or

Damien Lynch (Project Manager – Enabling) on 020 8420 9228

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# Tenant Policy

## Introduction

The Localism Act 2011 introduced a number of new flexibilities for local authorities to consider when deciding how to make best use of existing social housing and how to encourage the development of new affordable housing.

Alongside this there have also been changes to state benefit rules capping the maximum private rents for which benefit can be claimed, particularly for larger properties, as well as further changes to benefits in general set out in the Welfare Reform Act 2012.

As a consequence the Council decided to carry out early consultation with residents from August – October 2011 on how it would respond to the new flexibilities and the difficulties residents were facing due to the benefit changes. This Housing Changes review was reported to Cabinet in December 2011 together with a number of options and a direction of travel was agreed.

A set of new draft strategies and policies are now being developed for further consultation before being submitted for approval by Cabinet in December 2012.

The Council's draft Tenancy Strategy provides guidance to all social landlords in Harrow on our approach to:

- the introduction of flexible fixed term tenancies in Harrow;
- the introduction of Affordable Rents in Harrow

This Tenancy Policy sets out how the Council will introduce fixed term tenancies for new Council tenants from the date it is formally adopted. It will not apply to existing Council tenants. The policy is intended to protect residents who most need our support and recognises that the supply of housing at a low rent for life will never be sufficient to meet all of the priority housing needs in Harrow.

Most new tenants who can afford to do so will be expected to consider other housing options such as shared ownership or renting privately either in Harrow or elsewhere at the end of their fixed term tenancy.

## 1. Background

The Localism Act 2011 introduced flexible tenancies. These are fixed term renewable tenancies of not less than 2 years and can be offered to new tenants alongside secure or assured tenancies. A new approach to rents has also been introduced for housing association properties. New build homes and a proportion of relets can now charge higher rents of up to 80% of market rents.

Existing council and housing association tenants will not be affected by these changes unless they move to a new Affordable Rent property and will continue to enjoy their existing security of tenure and other terms and conditions including the

right to buy, succession rights and the right to exchange their tenancy with another secure tenant. The Act requires every local authority to produce a Tenancy Strategy setting out the expectations for all social landlords in the local area in relation to:

- The kinds of tenancies they grant
- The circumstances under which a particular type of tenancy will be granted
- The length of fixed term tenancies when these are granted
- The process for reviewing tenancies at the end of the fixed term and the circumstances under which a tenancy may or may not be renewed either in the same property or in a different property.

Every social landlord, including the Council is also required to have a Tenancy Policy. In addition to the above, the Tenancy Policy should contain:

- The way in which a tenant or prospective tenant may appeal about the length and/or type of fixed term tenancy offered and a decision not to renew the tenancy at the end of the fixed term
- How the need of those who are vulnerable by reason of age, disability or illness, and households with children are taken into account including through tenancies which provide a reasonable degree of stability
- The advice and assistance to be given to tenants to find alternative accommodation if a fixed term tenancy is not renewed.

This Tenancy Policy sets out how the Council will use flexible fixed term tenancies of 5 years for its own housing stock. It follows the principles widely consulted upon and set out in our Tenancy Strategy.

## **2. Context**

Harrow is an outer London borough with excellent transport links to central London, schools and access to attractive Green Belt and other open space. Along with other boroughs demand for housing is high and this is reflected in the high cost of housing both to buy and to rent privately. Unlike many other boroughs Harrow has a small supply of social housing at only 10% of the total housing stock. Twice as many people now live in the private rented sector (20%) whilst the vast majority (70%) own their homes.

As a result of state benefit changes and the effects of recession many more people have been coming to the Council for help with their housing over the past year. Due to the limited supply of social housing we help most people by assisting them to remain in their current homes or by encouraging and assisting them to find alternative housing in the private rented sector.

It is becoming increasingly important that our own small Council housing stock is used to its full potential to provide homes for those in the highest priority housing need. Whilst the introduction of fixed term tenancies is not likely to produce significant numbers of additional Council housing for re-let it will help us to target social housing at those who most need it and makes an important contribution alongside other initiatives such as those to encourage under-occupiers to downsize.

You can find more information on the facts and figures supporting this policy at:  
[http://www.harrow.gov.uk/download/downloads/id/1669/housing\\_evidence\\_base\\_september\\_2012](http://www.harrow.gov.uk/download/downloads/id/1669/housing_evidence_base_september_2012)

### 3. Objectives

This Tenancy Policy supports a number of our overarching objectives approved by Cabinet in December 2011 as follows:

**Deliver excellent services shaped and valued by our communities** – we have developed both strategy and policy in consultation with the community.

**Increase the supply of housing, including locally affordable housing and make best use of the existing social housing stock** – whilst we aim to build as much additional affordable housing in Harrow as we can we know this will never meet all needs and therefore our existing social housing stock must be targeted at those who most need it.

**Continue to tackle homelessness by improving access to and improving standards in the private rented sector** – the tenancy policy should support and complement initiatives that promote economically realistic housing options in the private sector.

**Enhanced housing options, promoting mobility and choice** – supporting households to consider the economically realistic housing option that best meets their current housing need and to think about what that might be in the future.

**Supporting sustainable and viable communities** – this policy should contribute to tenancy sustainment and the promotion of employment and training opportunities so that tenants are supported in adapting to the changing state benefits environment and the most vulnerable households are protected and supported in their home.

### 4. Who should be given which type of tenancy?

The Council is now intending to use introductory tenancies followed by flexible (fixed term) tenancies for the majority of new tenants. All new social housing tenants will be granted a 12 month introductory tenancy prior to transition to the next stage of tenancy.

Flexible tenancies will help us to ensure that our scarce Council housing stock is used in the best way to help those most in need. We have consulted on the best way to balance the need to make the best use of our stock whilst protecting those households who most need our support and whose circumstances are highly unlikely to change in the future and/or not to penalise existing secure tenants who may need to move.

The reason for this approach is that there may be situations where for example someone no longer needs a specialist or adapted property and the granting of a lifetime tenancy in all circumstances would prevent making best use of the property.

Automatic renewal for those falling within the criteria listed at 7a below, where the household continues to have the same needs will provide the necessary certainty of support to vulnerable households.

We will offer the following applicants life-time tenancies (preceded by an introductory tenancy where applicable):

- Existing social housing tenants with a life-time tenancy transferring within our stock or from another social housing provider;
- Older people moving into sheltered or extra care housing;
- Older people who have reached state retirement age and are moving into a one bed general needs property.

In all other circumstances a fixed term tenancy will be granted.

## **5. Minimum length of tenancy**

The council will initially offer a 12 month introductory tenancy followed by a minimum 5 year tenancy period in most circumstances where a fixed term tenancy is being granted. We consider that a 5 year tenancy offers reasonable security to most households and is considerably more secure than the average initial tenancy granted in the private sector.

In addition, we expect the majority of fixed term tenancies will be renewed where tenants' circumstances have not changed materially, for example the household income has not increased and there is no other more economically realistic affordable housing option and/or the household size still matches the size of property.

However, reviewing the tenancy prior to the end of the fixed term will enable tenants to consider what other housing options there are or might be in the future and to discuss other opportunities for example relating to employment/training initiatives.

The Localism Act allows the granting of shorter tenancies of no less than two years in exceptional circumstances. The council will not grant a shorter tenancy period in any circumstances other than those specified below:

- Where a shorter tenancy period is required to enable redevelopment to take place.

## **6. Succession**

In view of the limited amount of social housing in Harrow, the Council will only offer succession in the following circumstances for tenancies that started after 12 August 2013:

- 1 A spouse or civil partner of the opposite or same sex living at the tenancy address as their principal or main home at the time of the tenant's death; or

- 2 Where a family member<sup>1</sup> has been part of the household for at least 5 years or where a carer (who is not a family member or employed as the carer) gave up accommodation to care for a minimum of 12 months, the property meets their housing needs and no alternative economically realistic housing option exists.

All other provisions relating to succession are contained in Resident Services' Succession Policy.

## **7. End of fixed term reviews and principles for renewal of tenancy**

### **Tenancy reviews**

The tenancy review is primarily an opportunity for the Council and tenant to consider if the current home still best meets the tenant's needs and how it might be possible to meet future aspirations, for example

- home ownership by discussing low cost home ownership options available savings for deposits etc
- sign-posting to advice and guidance to non-working households on national and local employment and training initiatives.

We will aim to carry out the review at least 9 months before the tenancy is due to come to an end to allow sufficient time for a tenant to find alternative housing if the tenancy is not renewed and alternative accommodation is not to be provided.

There are five options available at the end of the flexible tenancy term:

1. Offer a further flexible tenancy at the current property
2. Offer a lifetime tenancy at the current property<sup>2</sup>
3. Offer a further flexible tenancy at another property
4. Offer a lifetime tenancy of another property, for example sheltered accommodation
5. Not offer a further tenancy on expiry of the current flexible tenancy

Where the conditions of tenancy have been complied with and the tenant's circumstances remain similar to when the tenancy was originally granted, the Council will generally expect to grant a further tenancy. However, there should not be a presumption that the tenancy will be renewed.

### **Refusal to comply with the renewal process**

Where a tenant refuses to co-operate fully with the review process such as failing to provide information to allow a review of the household's circumstances or fails to contact the Council at least seven months prior to the date the tenancy ends, the

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<sup>1</sup> Family member as defined by Housing Act 1985 section 113

<sup>2</sup> This will be limited to tenants over pension age living in a one bed general needs property

Council may proceed with the review process based on the available information in the tenant's absence.

### **Advice and guidance**

The Review will be carried out by trained housing officers (from all appropriate sections within the Housing Division) and include offering appropriate pro-active advice and assistance to find alternative accommodation. Options for alternative housing could include home ownership either outright or through the various central or local government initiatives, a privately rented home either in Harrow or elsewhere or a more suitable affordable rented home either in Harrow or elsewhere.

Appropriate advice on employment and training initiatives will be provided to non-working households including young adults who form part of the household (through referrals to appropriate Council departments or external agencies).

Where a tenancy review is being carried out with a vulnerable household, such as a care leaver or other vulnerable adult, the tenant will be recommended to seek support through an advocate, support worker or other appropriate agency.

### **7a Renewal to a further flexible or life-time tenancy**

Based on our evidence we expect the majority of Council tenancies to be renewed. All new tenancies granted on renewal, with the exception of life-time tenancies, will be granted as fixed term tenancies and are expected to be renewed if the tenant's household circumstances are unchanged or are similar to when they were originally housed. Automatic renewal will take place in the circumstances set out at points 1-4 below:

1. The tenants have reached state retirement age and are living in a 1 bedroom general needs property. In such circumstances tenants will be offered a life-time tenancy
2. The tenant(s), their spouse or partner or a dependent child is disabled validated by the award of disability benefits
3. The tenant(s), their spouse or partner or a dependent child have a severe learning disability or severe enduring mental health need validated by the relevant officer in the Council's People directorate.
4. The tenant was a Care Leaver and is still receiving support from the Council's Leaving Care Team.

However, in addition to the circumstances set out above, the principles for renewal listed at 7b will also be considered in all cases where there is no automatic renewal. This may mean that in some circumstances a renewal tenancy may be offered for an alternative property of a suitable size or that despite no material changes in the tenant's circumstances, no further tenancy will be offered due to the tenancy not being conducted in a satisfactory matter.

## **7b Principles for tenancy renewal**

The Council will consider the following principles when determining whether to renew the tenancy:

### **Suitability of property**

1. The property should meet the current housing needs of the tenant and their household. Examples where the property is no longer suitable e.g if the property is under-occupied by one room or more (this includes a bedroom or second reception room) and an alternative suitably sized property is being offered
2. Although overcrowded properties do not suit the current needs' of the tenant and the household, where all other criteria have been met, the tenancy should be renewed at the current address. In such circumstances the tenant may be offered advice and information on other housing solutions that may offer appropriately sized accommodation.
3. The property has been extensively adapted for someone with a disability who no longer lives with the tenant and an alternative property is being offered. In these circumstances it would be reasonable not to renew the tenancy for the current address so that the adapted property can be let to someone who needs it.
4. Other considerations to be taken into account with regard to the suitability of alternative accommodation might include specific individual circumstances and access to family support networks.

### **Conduct of tenancy**

The Council will usually be minded to not renew the tenancy in cases where:

1. The tenant has breached the terms of their tenancy and failed to reach and maintain an agreement with the Council to remedy this breach. For example there are rent arrears and the tenant has not maintained an agreement or court order.
2. There has been serious and persistent documented anti-social behaviour committed by the tenant, a member of their household or visitor.
3. The tenant or a member of the household has a conviction for civil disturbance carried out in the locality of Harrow or other criminal activity such as housing fraud.
4. There is a possession order, including a suspended order, in force in relation to the relevant tenancy.

Cases will be determined on their individual merits taking account of issues such as: tenant engagement, compliance with court orders or other interventions, household composition, intentionality and costs likely to accrue to the Council.

### **Financial considerations**

The review will consider whether the tenant's household income is sufficient to enable the tenant and their household to find other suitable accommodation either by

moving into intermediate housing (low cost home ownership or sub-market rent), private rented or buying on the open market.

The council has adopted the financial limits set out in the Mayor of London's strategy for access to shared-ownership<sup>3</sup> and intermediate housing products. This limit is currently set at £90,000 gross per annum combined income for the tenant and partner. Tenants with income above these levels will not be eligible for a renewal of tenancy.

This has the advantage of being regularly updated offering London-wide financial limits that will allow tenants to access properties across London thereby providing maximum mobility.

### **7c Renewal in exceptional circumstances**

We recognise there may be circumstances where it might be considered unreasonable to expect someone to move even if one of the above criteria apply and we will consider allowing a tenancy to continue if:

- The tenant or a member of their household is suffering from a terminal illness
- The tenant has children attending a local school at key stages of education, specifically in year 10/11 or year 12/13 and no economically realistic alternative housing is available locally
- The tenant is a foster carer and the tenancy needs to continue to enable them to fulfil this role
- The tenant is participating in a Tenancy Sustainment Programme or a training and employment programme and moving at this stage would prevent the tenant from completing the programme
- The tenant makes an active and positive contribution to their local community through, for example, volunteering for an approved organisation on a regular basis.

### **7d Maximum length of term on renewal**

When deciding on the length of term for a renewal tenancy, the council offers tenancies of the following lengths:

- Households comprised solely of adults who have attained pension age during the initial grant of tenancy living in a one-bed general needs property should be offered a life-time tenancy.
- All other households will be offered a further five year fixed term tenancy.

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<sup>3</sup> <https://www.london.gov.uk/what-we-do/housing-and-land/homes-londoners/buying-affordable-home#acc-i-51719>

## **8. Review (or appeals) against flexible tenancy decisions**

There are two stages at which an applicant can seek a review of any decision relating to the flexible tenancy.

### **Review of offer to grant a flexible tenancy**

Following the service of the notice stating that on the coming to an end of the introductory tenancy it will become a flexible tenancy, the applicant can request a review of the Council's decision about the length of the period of the flexible tenancy. A review can only be requested on the basis that the term of the flexible tenancy does not accord with the Council's policy.

These reviews are likely to be very small in number as the Council will in the main be granting 5 year flexible tenancies.

### **Review of decision not to renew the flexible tenancy**

Reviews are carried out in line with the Review Procedure as stated in the Flexible Tenancy Renewal Procedure.

Following the tenancy review and after the provision of appropriate advice and assistance as set out above, the Council will serve Notice where it is not going to renew a tenancy at the existing tenancy address at least six months before possession of the property is sought. The Council will endeavour to serve the Notice at least six months prior to the end of the tenancy ("the First Notice").

The Notice will state that the Council does not propose to grant a new tenancy on the expiry of the flexible tenancy, the reasons why the tenancy is not being renewed and explain the review process.

The Council will also serve a Notice giving the tenant not less than two months' notice that the Council requires possession of the property and the date after which court proceedings may be begun ("the Second Notice"). In most cases the Notice will be served at least 2 months before the tenancy is due to end. If the tenant refuses to move when the notice period set out in the Second Notice expires a court order will be applied for and the usual eviction process followed.

Where the Council has reached a decision that a further tenancy should not be awarded and has complied with any review requests that decision will stand, the Council will not revisit that decision prior to instigating legal proceedings.

## **9. Equalities**

We have used the Equalities Impact Assessment completed for the Tenancy Strategy to inform this Policy which follows the principles endorsed through the consultation process.

## 10. Reviewing the Tenancy Policy

This policy will be monitored and reviewed annually. Revisions, such as to the income and savings caps, will be authorised by the Portfolio Holder for Housing.

Review date	<b>October 2019</b> or sooner if required by changes to legislation or management practice
Revisions	Changes to document in Section 7 to uprate the financial thresholds for renewal of a fixed term tenancy
Signature	
Name	Karen Connell, Head of Resident Services
Date	12 November 2018



# HARROW'S HOUSING EVIDENCE BASE AFFORDABILITY OF HOUSING IN HARROW

**JUNE 2020**

# HARROW'S HOUSING EVIDENCE BASE

## AFFORDABILITY OF HOUSING IN HARROW – JUNE 2020



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# HARROW'S HOUSING EVIDENCE BASE

## AFFORDABILITY OF HOUSING IN HARROW – JUNE 2020

### Population

Housing demand has increased substantially as Harrow's population has grown by around 10,650 (4.4%) since the 2011 mid-year estimate. In the 2011 Census Harrow was recorded as having the second highest average household size in England at 2.8.

In the last year the population has increased by just over 1,000 (0.4%) to 251,160 at June 2019.<sup>1</sup> There were almost 2,100 more births than deaths, a net gain of almost 2,400 from international migration and a net loss of over 3,500 from internal migration. The UK's population growth was 0.5% and London's was 0.6%, the slowest growth rate for both since 2004.

21.3% of Harrow's population are aged under 16, 62.8% fall within the 'working age group' of 16 to 64 and 15.9% are 65+. The number and proportion of older people continues to increase each year.

### Local Earnings

The ONS provisional estimate of median gross full-time pay of Harrow residents was £693.40 per week in 2019<sup>2</sup>, an increase of 3.3% over the previous year. This is equivalent to an annual gross salary of about £36,000 and is in line with the average for London. It is higher than most of our West London neighbours - Brent (£610), Ealing (£622), Hillingdon (£621) and Hounslow (£649).

Housing affordability is calculated by comparing the earnings of those in the 'lowest quarter of average earnings' with property prices in the most affordable quarter of the market or 'lower quartile'.

### Stability of Income

The increase in all forms of flexible working - the 'gig economy', zero hours contracts etc. means less stability of income, fewer housing options and an increased risk of falling into rent or mortgage arrears. It also makes benefit claims more difficult to manage.

The coronavirus pandemic has added further uncertainty to earnings. Harrow has the 2<sup>nd</sup> highest percentage of Small and Medium Enterprises (SMEs) and the 4<sup>th</sup> highest percentage of micro businesses in London. It has also historically had a high proportion of commuters into central London.

A number of government schemes have been created to alleviate financial hardship caused by COVID-19. The Coronavirus Job Retention Scheme allows employees on PAYE to be furloughed, but this will only be for a limited period. The Grants to Small Businesses Scheme entitles approximately 2,800 qualifying small businesses in Harrow a grant of either £10k or £25k dependent upon their rateable value, and an additional discretionary small business grant scheme was announced on 1 May. 100% business rate relief has been applied to all shops, hospitality, leisure and children's nurseries. In addition to these business measures, the Hardship Fund delivers relief to Council Tax payers, primarily through Council Tax Support (CTS) and increased financial assistance.

<sup>1</sup> Source: ONS Analysis of Population Estimates

<sup>2</sup> Source: Annual Survey of Hours and Earnings (ASHE)

## Home Ownership

Despite the introduction of government schemes to support buyers, e.g. Low Cost Home Ownership, Help to Buy and Right to Buy (social housing), home ownership in Harrow has declined to around 60% from 66% at the 2011 Census (75% in 2001) and the private rental sector (PRS) has increased to around 30% over the same period.

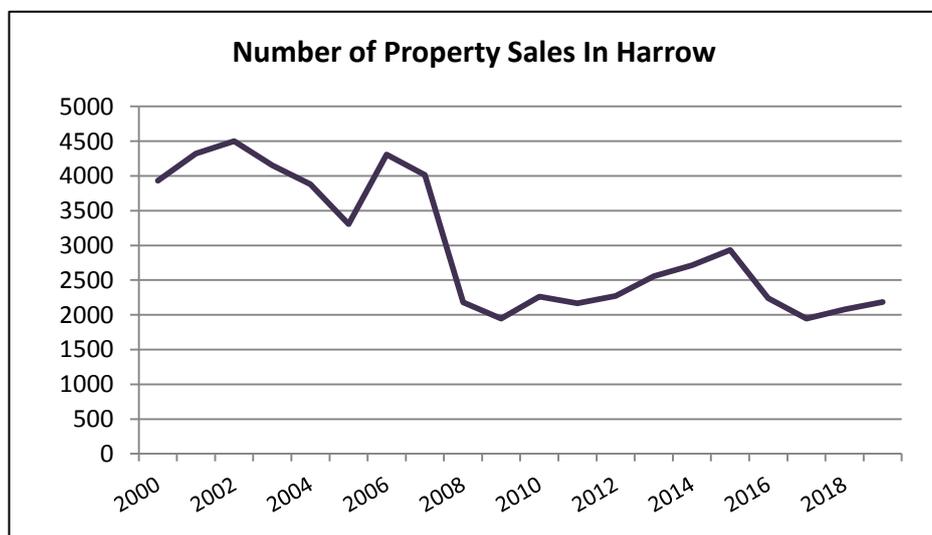
House prices have risen significantly faster than earnings and the median property price sale at September 2019 was £465,000<sup>3</sup> – 13 times the median salary. Mortgage availability has decreased and the deposit required in order to secure a mortgage has increased for both first-time buyers and those wanting to move home.

Borrowers facing a reduction in income during the coronavirus crisis are able to defer payments for up to 6 months, applicable to both residential and buy-to-let mortgages, and all housing repossessions were suspended for 3 months from 27 March 2020.

With good transports links, a low crime rate and green spaces, Harrow is a desirable but expensive borough to live in. Only 5% of properties are in Council Tax bands A and B, whereas London averages 17% and England averages 44.4%. Harrow also has the third highest Council Tax in London after Kingston-upon-Thames and Richmond-upon-Thames, with Band D costing £1,523 in 2020. Westminster had the lowest Band D rate of £449, followed by Wandsworth at £468. Hammersmith & Fulham, City of London and Kensington & Chelsea were also under £1,000.

The economic downturn since 2008 has adversely affected the housing market. The recession and government austerity measures have affected many of Harrow's residents, and not just those traditionally thought of as vulnerable.

Harrow property sales peaked at just over 4,500 in 2002 but declined to just under 2,200 in 2019.



Source: Land Registry

## Private Rental Sector

Based on median net earnings of approximately £2,340 per month, the median Private Rental Sector (PRS) rent for a 2 bedroom property in Harrow would consume 56% of one person's take-home pay, and even a lower quartile rent in Harrow would be 51% of their take-home pay. 3 bedroom properties would be 70% and 64% respectively.

<sup>3</sup> Source: ONS from Land Registry data

Whilst many households earn two salaries, parents work full-time less frequently, and any childcare costs also need to be factored into affordability of rent.

Monthly rents 2019	North West London LHA	Harrow Lower Quartile Rent	Harrow Median Rent	London Lower Quartile Rent	London Median Rent	England Lower Quartile Rent	England Median Rent
Room	£402	£500	£563	£525	£600	£347	£390
Studio	£880	£750	£850	£800	£950	£433	£575
1 bedroom	£880	£950	£1,050	£1,060	£1,288	£470	£600
2 bedrooms	£1,114	£1,200	£1,300	£1,300	£1,500	£525	£650
3 bedrooms	£1,393	£1,500	£1,638	£1,500	£1,800	£600	£750
4+ bedrooms	£1,671	£1,750	£2,000	£2,000	£2,500	£900	£1,320

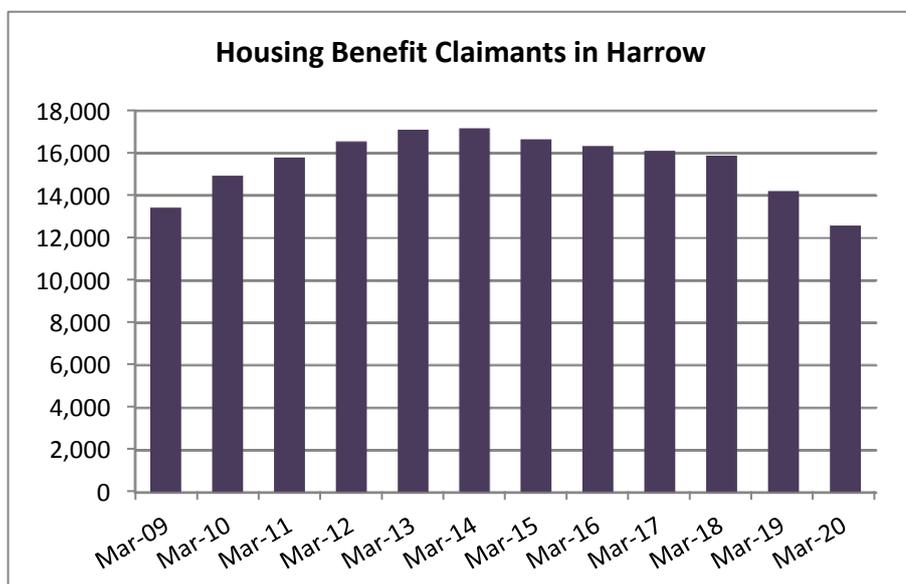
Source: Valuation Office Agency

Emergency measures introduced by the government during the coronavirus pandemic include suspension of all evictions of tenants in both social and privately-rented accommodation, initially for 3 months from March but, at the time of writing, has been extended until 23 August.

Welfare reforms have impacted on private landlord behaviour, with many refusing to renew tenancies because they no longer receive direct payments of Housing Benefit (HB) for claimants of Universal Credit (UC).

### Housing Benefit

The Local Housing Allowance (LHA) was introduced in 2008 and is the maximum amount of assistance with housing costs that can be awarded to someone claiming HB or UC who lives in private rented accommodation. It is based on the number of bedrooms needed and the average rent in the area. The number of Harrow households claiming HB in March 2020 was 12,587. This has declined since the introduction of Universal Credit (UC) in 2018.



Source: Revenues & Benefits / DWP

Despite rising rents, LHA rates have been significantly reduced since 2011 and were frozen from 2016/17 to 2019/20, putting many households at risk of homelessness. This is because the maximum amount of HB they can receive as a private renter is often less than the cheapest rents available locally, making it very difficult to find affordable accommodation.

In response to the coronavirus crisis LHA rates have been increased for 2020/21 to match the 30th percentile of rents in each local area. This increase is welcome but it is not yet clear what the position will be from 2021/22.

### Universal Credit

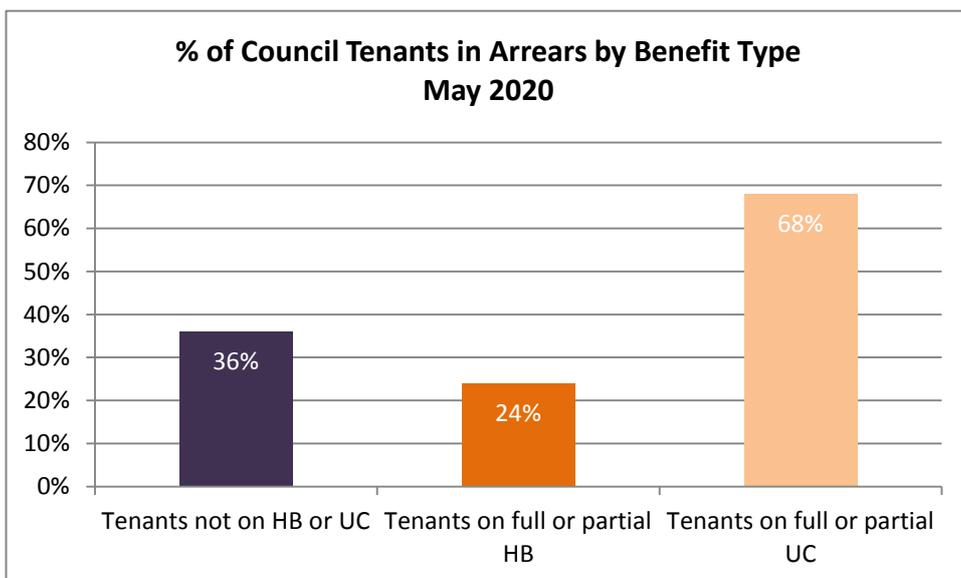
UC is a single benefit replacing HB, Working Tax Credit, Child Tax Credit, income-based Jobseeker’s Allowance, Income Support and related Employment and Support Allowance. It is being rolled out nationally under a ‘managed migration’ and was introduced in Harrow from July 2018. At February 2020 there were just under 7,000 households on UC, although the coronavirus pandemic has dramatically increased the number of applications since then.

It is too early to predict its long-term effect on affordability of housing in Harrow, but there is widespread concern about UC claimants falling into rent arrears and becoming at risk of homelessness in both the private and social housing sectors. Over the last 4 years the percentage of council tenants that are at least 7 weeks in arrears has ranged between 3% and 5%, and this will need to be monitored as more tenants move onto UC.

There are several reasons for the increased risk, including the in-built time-lag before the first payment and the fact that HB was paid directly to landlords whereas UC is paid to the claimant, who is responsible for paying their rent to the landlord. In some cases an ‘Alternative Payment Arrangement’ can be put in place, such as a ‘Managed Payment to Landlord’.

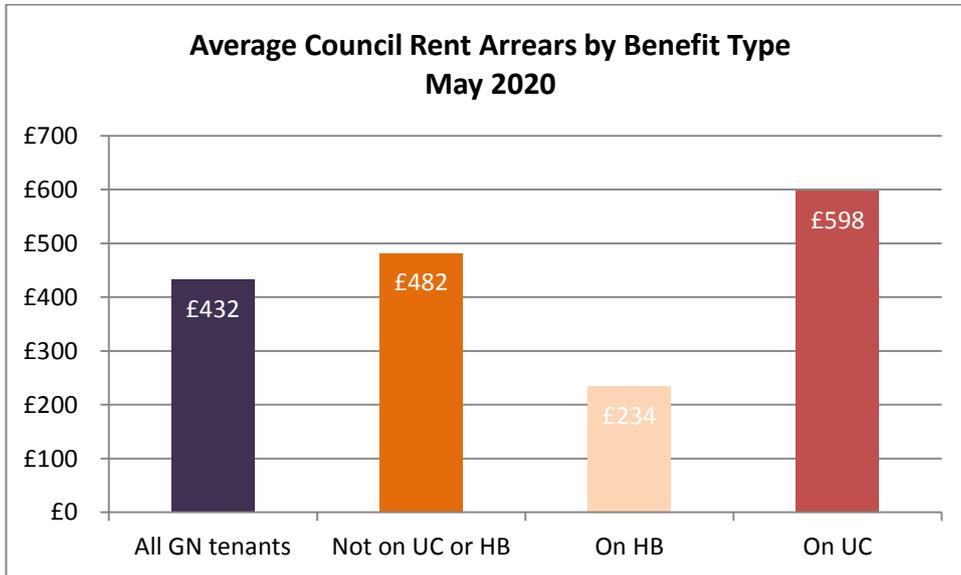
The percentage of Harrow’s council tenants on UC has increased from 7% in April 2019 to 16% in May 2020 and council tenant HB claimants have reduced from 57% to 51%.

The UC claimants are in a far worse position than the HB claimants, with 68% in arrears compared with 24% of those on HB.



Source: Northgate

As well as a higher proportion of UC tenants falling into arrears, the amount they owe tends to be much higher. The average level of council rent arrears was over 2.5 times higher in UC tenants (£598) than in HB tenants (£234) in May 2020.



Source: Northgate

A survey by ARCH, the Association of Retained Council Housing, and the National Federation of ALMOs (Arms-Length Management Organisations) that measured the impact of UC on local authorities reported similar results in 2019.<sup>4</sup>

**Overall survey (data at 31st March 2019)**

39 respondents managing over half a million social and affordable properties.



The Council has taken steps to mitigate the effects as far as possible for both social and private tenants e.g. requesting increased levels of direct HB payments to landlords and providing information, advice and signposting, but resources are limited and as the roll out to UC progresses it will become even more challenging to offer adequate personal support to maintain tenancies.

<sup>4</sup> Source: [Patching the Safety Net - Measuring the Impact of Universal Credit on tenants and landlords \(2019\)](#)

## Social Housing

Although 23% of London's population lives in social housing, Harrow has the second lowest proportion at just 10% of its 91,909 households. At March 2020 there were 4,823 Council properties, up from 4,773 the previous year, and the first increase in decades due to housebuilding and acquisition.

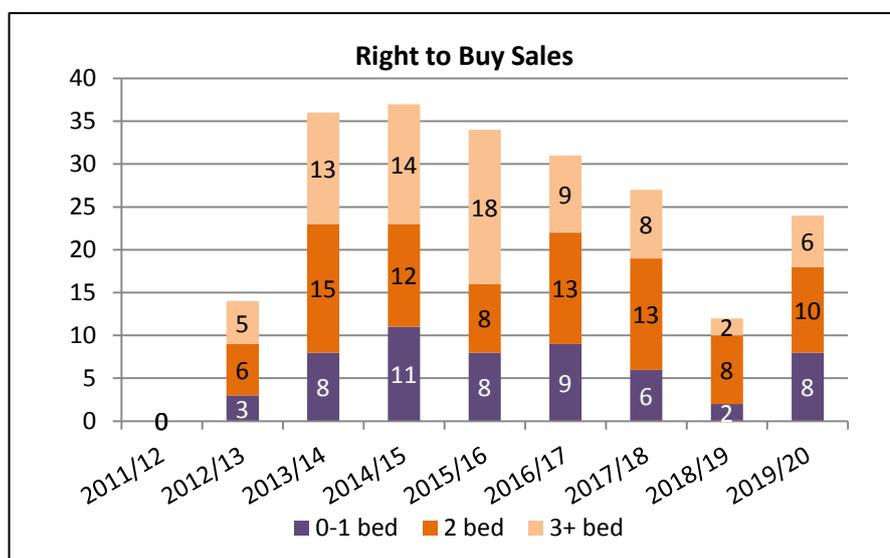
Stock Levels of Social Housing in West London Boroughs, 2019					
Borough	Stock	No. LA	% LA	No. RP	% RP
Brent	120,448	8,345	6.9	18,585	15.4
Ealing	135,305	11,747	8.7	12,171	9.0
Hammersmith and Fulham	89,186	12,141	13.6	13,243	14.8
Harrow	91,909	4,773	5.2	4,364	4.7
Hillingdon	110,734	10,086	9.1	7,622	6.9
Hounslow	101,838	13,085	12.8	8,488	8.3
Kensington and Chelsea	87,726	6,883	7.8	12,888	14.7

Source: MHCLG

Roxbourne Ward, which contains the Rayners Lane Estate, has Harrow's highest proportion of social rented properties at one quarter of all households.

Households from all ethnic groups live in Harrow's social housing, reflecting the diverse population of the Borough. Of disclosed ethnicity, the largest single group housed within the Council's stock is White at 48% of known ethnicity, followed by Asian at 23% and then Black at 20%. This isn't representative of Harrow's current demographic and is likely to be due to a combination of factors including longevity of tenancies, very low churn in our small stock, the discharging of housing duty into the private sector since 2011, cultural differences including multi-generational living and the fact that this figure is calculated on 'known' ethnicity, with BAME tenants less willing to disclose their ethnicity.

The increased 'Right to Buy' (RTB) discount since 2012 means sales of family sized Council homes are still outstripping the Council's ability to replace them, particularly as there are many government restrictions on the use of 'Right to Buy' receipts. We have lost almost half of our stock to RTB, with 4,215 properties sold between 1980 and March 2020. The previously slowing trend was reversed in the last year, with 24 sold in 2019/20, 16 of which were 2 or 3 bedroom family homes. Social housing stock may be further reduced if 'Right to Buy' for housing association tenants is rolled out nationally.



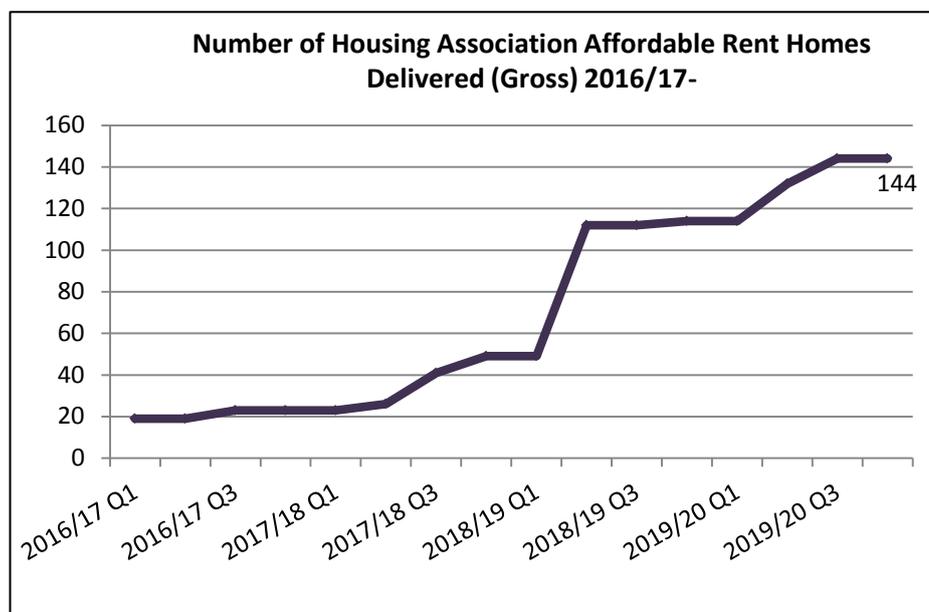
Source: Leasehold Team

## Maximising Social and Other Affordable Housing

The 'Homes for Harrow' initiative, a number of major planning applications and the focus on the Housing Zone in central Harrow including the Council's regeneration plans means that Harrow's house building will remain strong over the next five years and will go some way towards, but not fully meet, demand.

The Housing Enabling Team monitors and delivers new affordable housing in Harrow. Section 106 agreements, also known as planning obligations, are agreements between developers and local planning authorities that are negotiated as a condition of planning consent. The maximum reasonable amount of affordable housing is sought from schemes providing 10+ residential units in line with the London Plan and Local Development Framework Policy, but it is particularly difficult to deliver family-sized accommodation without reducing overall affordable housing numbers.

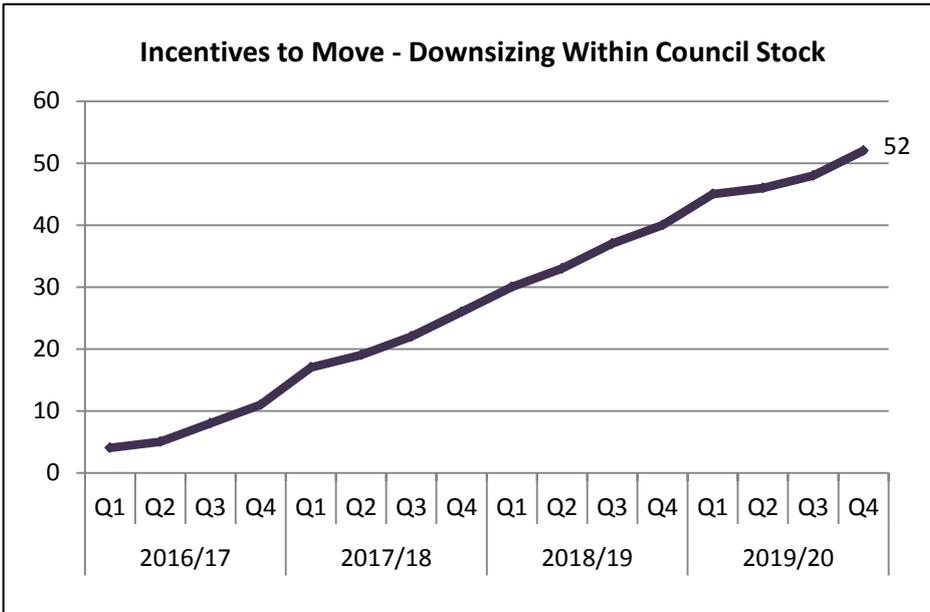
GLA London Affordable Rent levels (exclusive of service charge) are set annually by the mayor for rented affordable housing and are considered to be affordable in London. They are broadly similar to 'social rent' levels and are around 50% of market rent in London.



Source: Enabling Team

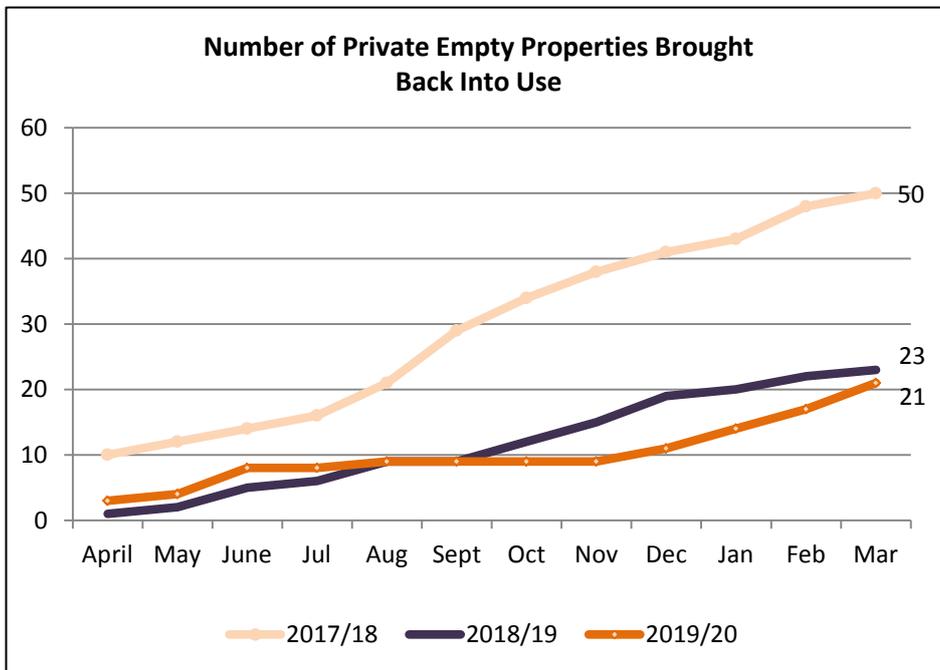
The Council is building new homes for the first time in decades. 93 new homes are completed with a further 134 under construction. Additional funding has been received for a total council house building programme of 639 new homes – 580 for social rent and 59 for shared ownership. This includes the regeneration of the Grange Farm estate which will see 574 new homes built - 249 for social rent, 25 for shared ownership and 300 for private sale to offset costs. The first phase of 89 homes is now on site.

Under-occupiers of social housing are encouraged to downsize in order to free up family-sized accommodation. Those willing to move are offered financial incentives and given the highest priority on the Housing Register. 52 households were incentivised to downsize within Council stock between April 2016 and March 2020, and a further 67 properties were freed-up through the 'Grants to Move' Scheme that operated between 2013 and 2018.



Source: Enabling Team

The Council works with private sector landlords in various ways such as by offering Empty Properties Grants (EPGs) to increase the availability of affordable rented accommodation. 153 empty privately owned properties have been made available to the Council for Temporary Accommodation (TA) between April 2016 and March 2020, but changes in government policy on Buy-to-Let, Brexit uncertainty and reduced grants have affected the potential supply over the last 2 years.



Source: Enabling Team

Harrow's Help2Let Team works in partnership with landlords to assist those in housing need to rent in the private sector. As well as enabling families to avoid homelessness it is particularly important in relieving homelessness and discharging the main homelessness duty by placing these households into PRS accommodation at Local Housing Allowance (LHA) rates. Affordability of even the lowest rent PRS properties in Harrow is becoming more and more of a challenge and Help2Let is increasingly working with landlords outside of Harrow in order to offer families more affordable options.



Source: Housing Needs

Harrow is heavily reliant on the private rented sector (PRS) for temporary and permanent housing solutions. The Council has statutory responsibilities for licensing and enforcement within the PRS. It operates selective licensing in certain areas, as well as mandatory and additional licensing of Houses of Multiple Occupation (HMO's) with a duty to ensure that they are free from serious hazards, including overcrowding.

The Homes Act 2018 was introduced in March 2019 to improve regulatory control in the PRS, raise housing standards at the bottom of the rental sector and enhance tenants' protection. However, the cost of these improvements is likely to be reflected in higher rents, and more people could be priced out of Harrow.

## Homelessness

Homelessness is rising steeply and the Homelessness Reduction Act 2017, effective from April 2018, has increased the burden on local authorities.

Welfare reform, a very limited supply of social housing and a buoyant private rented market add to the Council's pressures from homelessness leading to higher numbers in Bed and Breakfast accommodation (B&B), rising costs and enforced moves out of Borough.

Homelessness triggered by the loss of a private tenancy has soared since the LHA cuts and caps began in 2011 and this is the most common reason for homelessness acceptances. The next most common is family or friends no longer willing to accommodate, and other reasons include domestic abuse and relationships ending.

Several thousand people in housing need contact the Council each year and there is a huge focus on advice and homelessness prevention. Whilst Harrow has always offered extensive prevention and relief assistance, the definitions have changed under the new Act, and the numbers recorded as assisted under these terms are not comparable with previous years.

Positive action by the Housing Needs Team prevented 180 households from becoming homeless in 2019/20 by helping to secure them existing or alternative accommodation for at least 6 months.

Despite all this work, 206 households were accepted as 'eligible, unintentionally homeless and in priority need' in 2019/20.

Emergency measures have been implemented during the coronavirus crisis to protect the homeless and those at risk of homelessness. The 'Everyone In' initiative provides emergency shelter for all rough sleepers, including those that wouldn't usually be eligible for public funds.

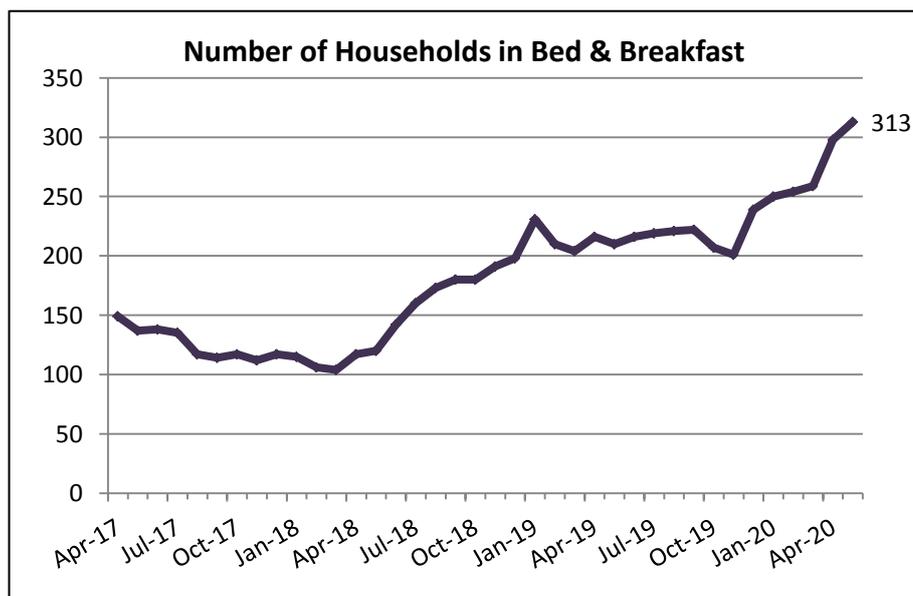
The criteria for homelessness applicants considered to be 'in priority need' based on their vulnerability has been broadened to include all those considered to be extremely clinically vulnerable to the effects of COVID-19 and anyone aged over 70.

### Households in Temporary Accommodation

Social housing is only available to those most in need and few properties become available for new tenants each year. With such a small stock in Harrow, around 1,200 homeless families were living in TA at March 2020, and the coronavirus crisis has increased this by 1-2% at the time of writing.

Households in TA with shared facilities have been moved to self-contained accommodation wherever possible to allow for self-isolation. It is too early to predict the long-term effects of COVID-19 on future policy or numbers.

Due to the range of efforts made on the supply front, including Grants to Move, EPGs and Help2Let plus the purchase of properties for use as temporary accommodation, the number of families needing to be placed in B&B was reduced to 104 by March 2018. Despite all this, the effects of the Homelessness Reduction Act, welfare reform and other pressures have meant this position was not sustainable, with the number climbing to 259 at 31 March 2020, and 313 by the end of May.



Source: Northgate

## Temporary Accommodation Placements Out of Harrow

Despite all efforts to secure more properties in Harrow, families often have to be housed elsewhere. In 2019/20 292 households were placed in short- and long-term temporary and emergency accommodation outside of Harrow.

2019-20	Households
Aylesbury	55
Brent	26
Northolt	14
Hillingdon	35
Watford	35
Bedfordshire	5
Barnet	13
Ealing	22
Enfield	4
Hertfordshire	23
Islington	1
Harlesden	9
Kettering	1
Willesden	2
Hounslow	19
Kingston	22
Croydon	1
Northampton	2
Slough	2
Bletchley	1
<b>Total</b>	<b>292</b>

Source: Northgate

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# HARROW'S HOUSING EVIDENCE BASE HOMELESSNESS & HOUSING NEEDS

# HARROW'S HOUSING EVIDENCE BASE

## HOMELESSNESS & HOUSING NEEDS



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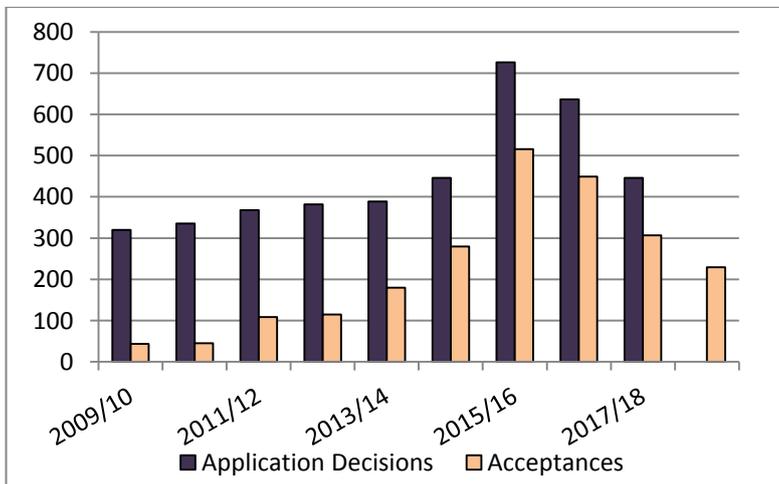
## HARROW'S HOUSING EVIDENCE BASE – HOMELESSNESS & HOUSING NEEDS

Welfare reform, a very limited supply of social housing, increased property prices and a buoyant private rented market have steeply increased homelessness, and the Homelessness Reduction Act (HRA17) has increased the burden on local authorities. Changes in reporting requirements from the P1E to H-CLIC have resulted in some indicators being difficult to compare with previous years.

### Homeless Applications and Acceptances

Several thousand people in housing need contact the Council each year. Most do not have a recognised priority need and are not eligible for social housing. They are offered advice and often assistance to either remain in their current home or to find alternative accommodation. Of those that applied, the number accepted as being eligible, unintentionally homeless and in priority need during 2018/19 was 229, over 5 times the number in 2009/10. The highest annual number of acceptances during the last 10 years was in 2015/16 at 726 (fig 4.1).

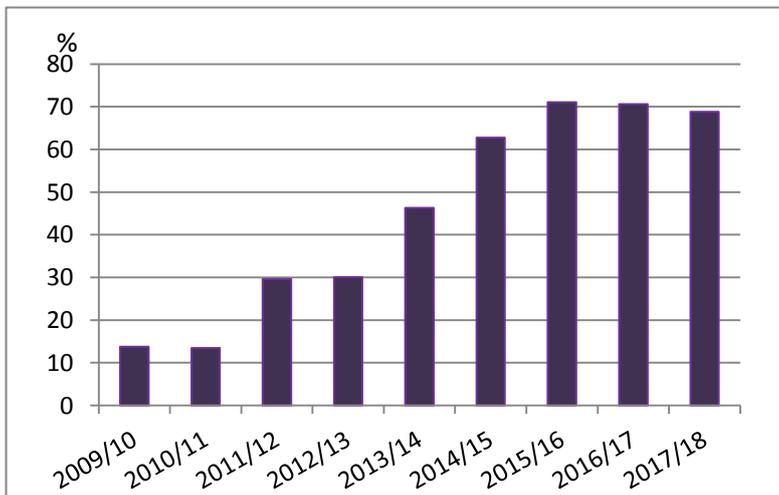
Fig 4.1 Homeless Applications & Acceptances



Source: P1E

Homelessness prevention work carried out by the Council ensures most families find suitable housing in the private rented sector (PRS) and limits the number of applications. However, the percentage of acceptances to decisions made has risen from just 14% in 2009/10 to 69% in 2017/18 (fig. 4.2).

Fig 4.2 Homelessness Acceptances as a Percentage of Decisions

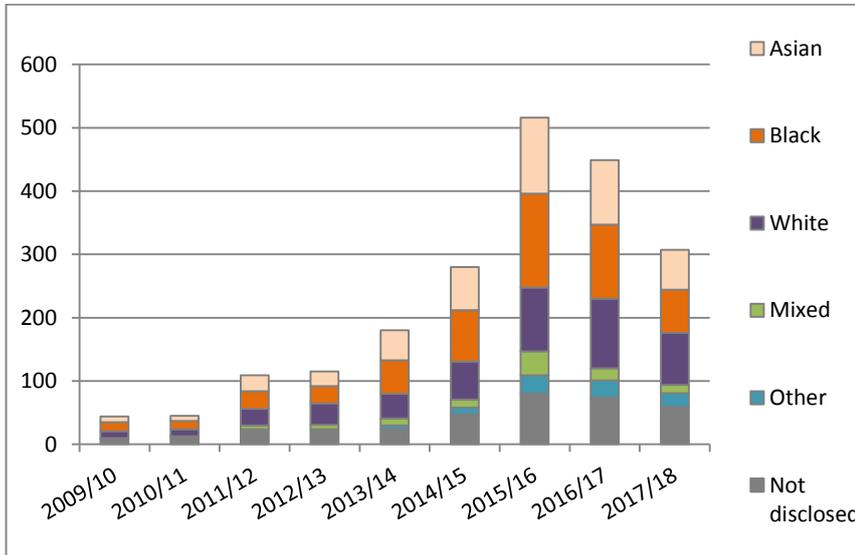


Source: P1E

### Protected Characteristics

Homelessness affects all communities regardless of ethnicity (fig 4.3). However, it seems that a disproportionately large number of Black households are affected each year. In 2017/18, 8.6% of Harrow’s population were Black but they constituted 27% of homeless acceptances. This may reflect particular issues of housing need within this group. 2018/19 indicative data suggests this figure to be around 30%.

Fig 4.3 Number of Homeless Acceptances by Ethnic Group



Source: P1E

Other protected characteristics<sup>1</sup> that are recorded for applicants include age and sex (fig 4.4 and 4.5).

Fig 4.4 Age of Applicant When Accepted as Eligible

2017/18	Number	%
Aged 16-45	209	68.1%
Aged 45-64	84	27.4%
Aged 65+	14	4.6%

Source: P1E

Fig 4.5 Applicant Households Accommodated by Household Type and Sex

	Couple with dependent children *	Lone parent household with dependent children		One person household		All other household groups	Total	of which: Minority ethnic
		Male Applicant	Female Applicant*	Male Applicant	Female Applicant			
2017/18	1,255	55	1,041	370	181	192	3,094	2,943

Source: P1E

### Reasons for Homelessness

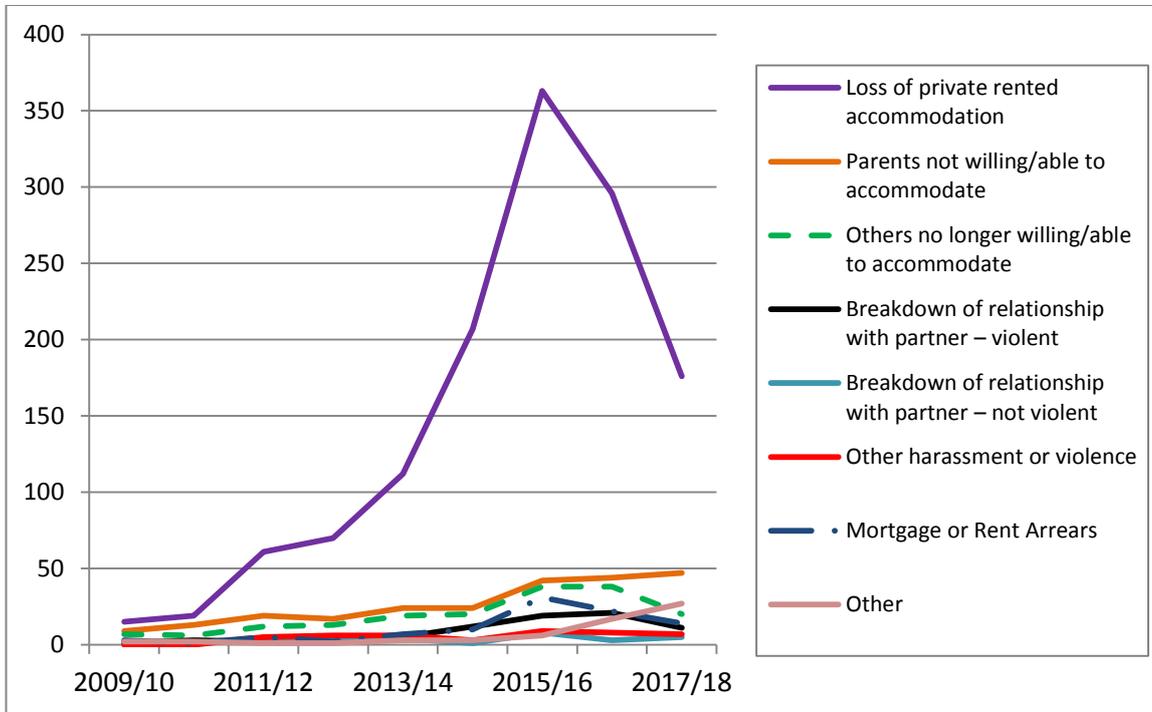
Homelessness triggered by the loss of a private tenancy has soared since the Local Housing Allowance cuts and caps began in 2011 and this is the most common reason for homelessness acceptances. The next most common is family or friends no longer willing to accommodate, and other reasons include domestic abuse and relationships ending.

<sup>1</sup> It is against the law to discriminate against anyone because of age, ethnicity, religion, disability, being married or in a civil partnership, being pregnant or on maternity leave, sex, sexual orientation or gender reassignment, and these are called ‘protected characteristics’

Harrow's Housing Evidence Base – Homelessness & Housing Needs

Loss of housing within the private rented sector was the cause for 57% of those accepted as being eligible, unintentionally homeless and in priority need of assistance in 2017/18, with 176 households affected. This has increased from just 15 households in 2009/10 (fig 4.6). Family or friends no longer willing or able to accommodate accounted for 22%, and 67 households were accepted for this reason in 2017/18, up from 16 in 2009/10.

Fig 4.6 Reasons for Homelessness Acceptances

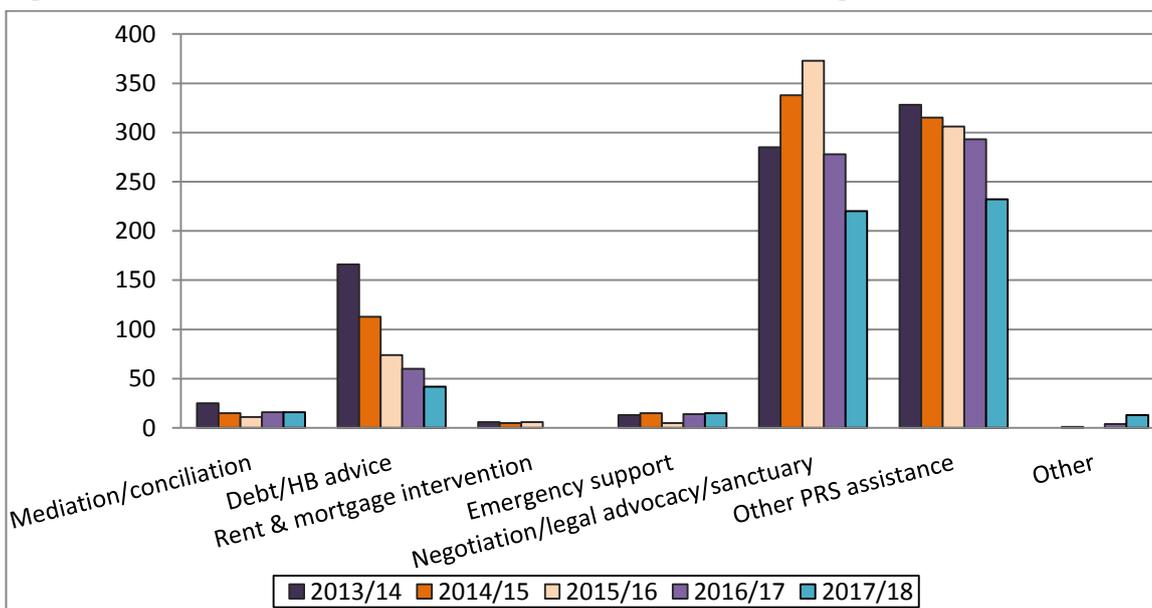


Source: P1E

Homelessness Prevention Activity

HRA17 includes specific Prevention and Relief duties, but the Council has always used a range of measures to enable people to remain in their existing home. These include the use of negotiation and legal advocacy, and offering 'other' private rental sector assistance, often financial (fig 4.7).

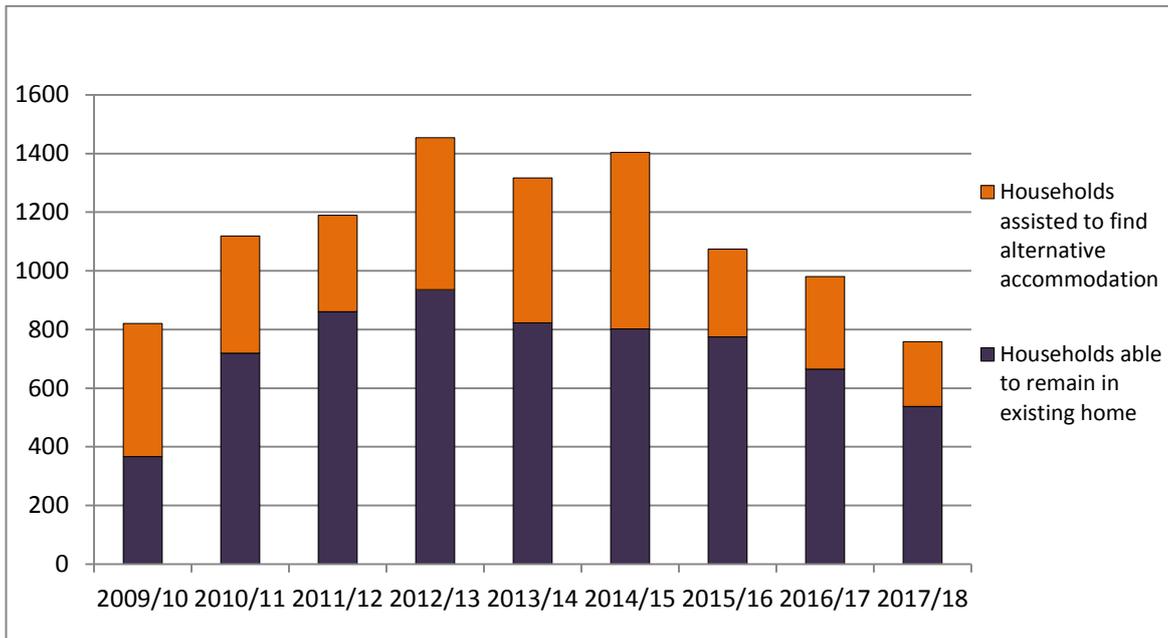
Fig 4.7 Homelessness Prevention Measures to Remain in Existing Home



Source: P1E

Where remaining in the current home is not possible, the Council supports people to find alternative accommodation and avoid homelessness, (fig 4.8) many through Harrow’s Help2Let service.

Fig 4.8 Homelessness Prevention

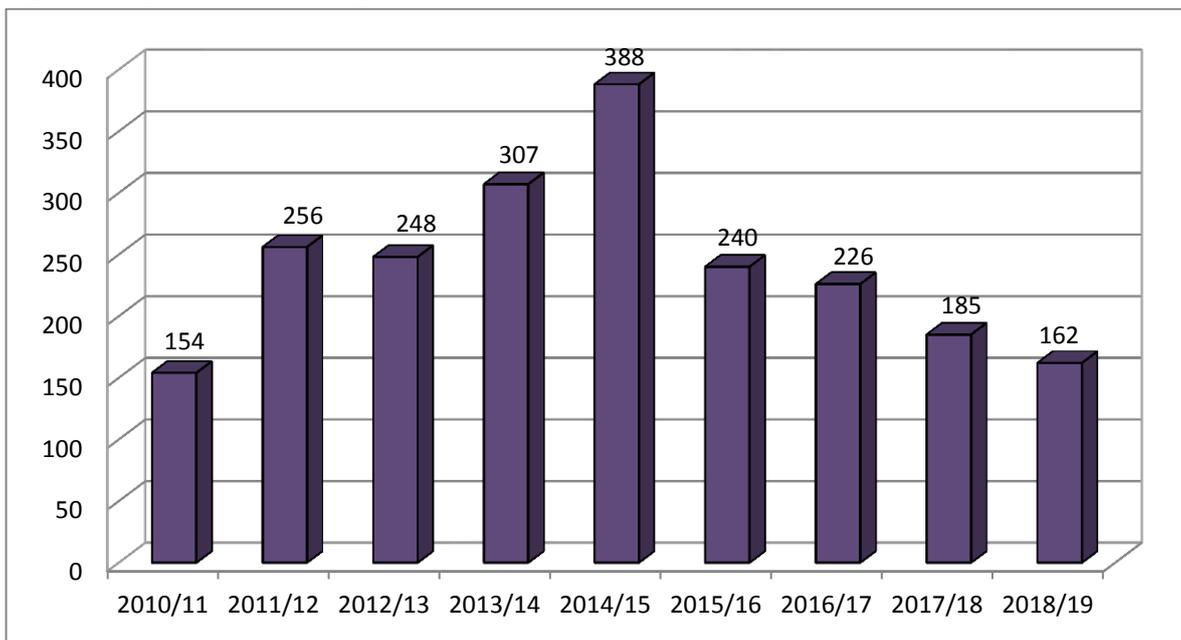


Source: P1E

### Help2Let

Harrow’s Help2Let Team works in partnership with landlords to assist those in housing need to rent in the private sector (fig 4.9). As well as enabling families to avoid homelessness it is particularly important in relieving homelessness and discharging the main homelessness duty by placing these households into PRS accommodation at Local Housing Allowance (LHA) rates. Affordability of even the lowest rent PRS properties in Harrow is becoming more and more of a challenge and Help2Let is increasingly working with landlords outside of Harrow in order to offer families more affordable options.

Fig 4.9 Help2Let PRS Lettings

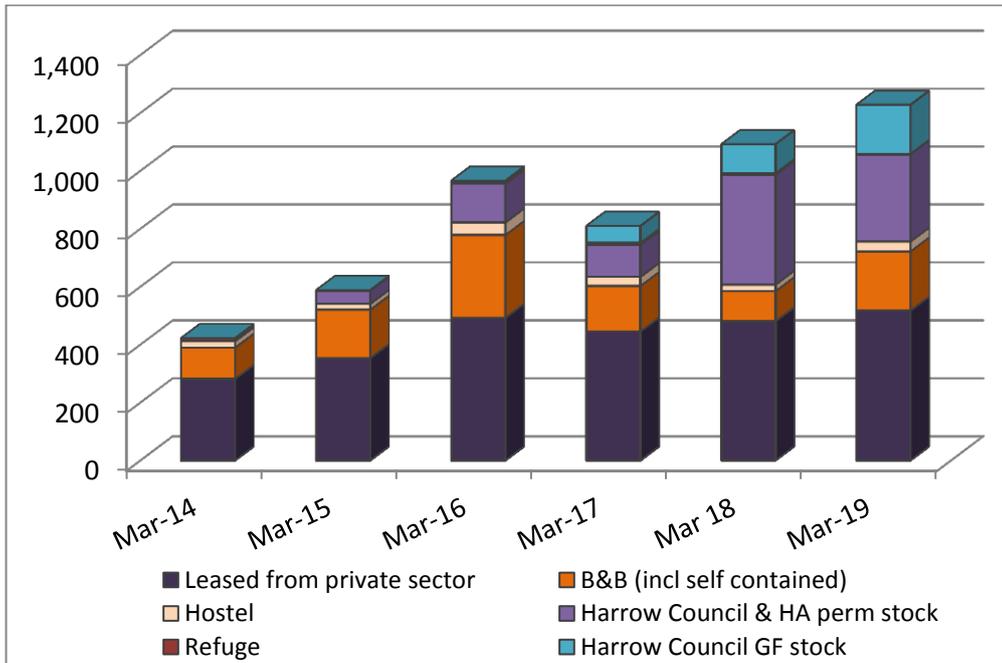


Source: P1E

### Temporary & Emergency Accommodation

Despite the huge emphasis on homelessness prevention, there were just over 1,100 households living in temporary and emergency accommodation in March 2019, more than 2½ times the number of 5 years previously. Around 50% were placed in properties leased from a private landlord by the Council or a Housing Association; just over 25% were placed in permanent Council stock, mostly on the Grange Farm Estate which is awaiting regeneration. 14% were living in homes bought by the Council's General Fund for use as TA and 18% were in Bed & Breakfast (fig 4.10).

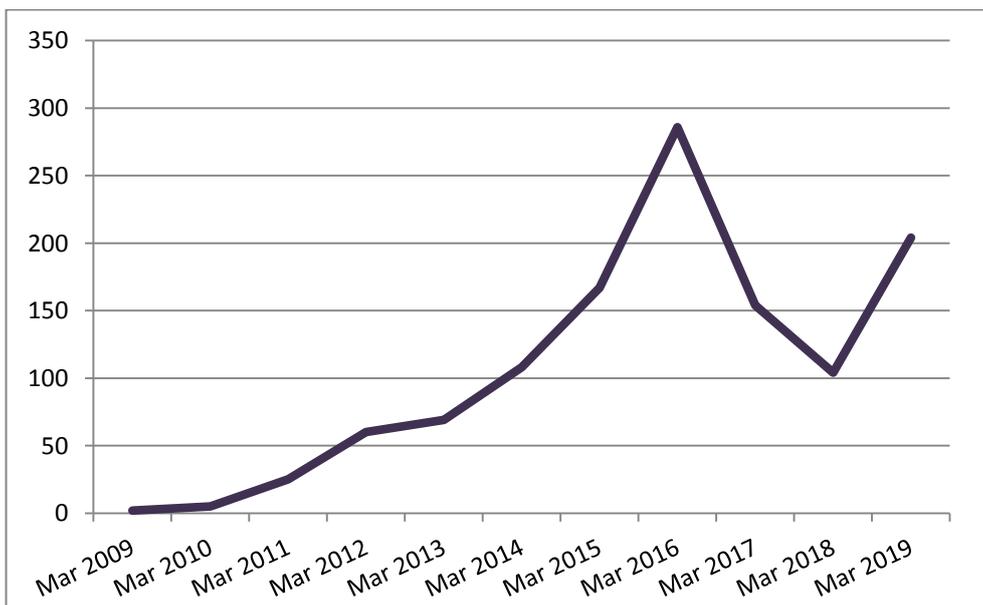
Fig 4.10 Homeless Households in Temporary Accommodation at Year-End



Source: P1E/Locata

With demand for TA far outstripping supply, use of Bed & Breakfast (B&B) accommodation has become much more common over the last 10 years. In March 2009 only 2 households were living in B&B but in March 2019 there were over 200, with a peak of 286 in March 2016 (fig 4.11).

Fig 4.11 Bed and Breakfast Usage



Source: P1E

There was a steady reduction in the number of families needing to be placed in B&B between March 2016 and March 2018. This was due to the focus on prevention and relief of homelessness, as well as increasing the supply of properties via Grants to Move, Empty Property Grants and Help2Let plus the purchase of homes for use as temporary accommodation. However, despite all this, the effects of the Homelessness Reduction Act 2017, welfare reform and other pressures have meant this position was not sustainable and the number doubled to over 200 by March 2019.

Despite all efforts to secure more properties in Harrow, families often have to be housed elsewhere. In 2018/19 235 households (583 people) were placed in short- and long-term temporary and emergency accommodation outside of Harrow (fig 4.12).

Fig 4.12 Bed and Breakfast Placements Outside of Harrow

<b>2018-19</b>	<b>Households</b>
Aylesbury	75
Brent	31
Northolt	23
Hillingdon	18
Watford	17
Barnet	8
Ealing	8
Enfield	6
Wolverhampton	5
Luton	5
Hemel Hempstead	5
Telford	4
Worcestershire	4
Hounslow	4
Birmingham	3
Surrey	2
Oldbury	2
Bradford	2
Northampton	2
Hatfield	1
Huntingdon	1
Peterborough	1
Brighton	1
Shipley	1
Hartlepool	1
Egham	1
Leeds	1
Slough	1
Leicester	1
Slough	1
<b>Total</b>	<b>235</b>

Source: Northgate

## Rough Sleeping

Rough sleeping is defined as ‘People sleeping, about to bed down (sitting on/in or standing next to their bedding) or actually bedded down in the open air (such as, on the streets, in tents, doorways, parks, bus shelters or encampments). People in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations, or ‘bashes’). The definition does not include people in hostels or shelters, sofa surfers, people in campsites or other sites used for recreational purposes or organised protests, squatters or Travellers sites.’

### Annual Rough Sleeping Estimate

A single night snapshot of rough sleeping is taken annually in October or November in England using street counts, evidence-based estimates, and estimates informed by spotlight street counts. Local authorities decide on the best method in order to assess the number of people sleeping rough in their area. The count does not include everyone in an area with a history of sleeping rough, or everyone sleeping rough in an area. The figure is reported to MHCLG and the process is supported by Homeless Link.

Rough sleeping levels in Harrow (fig 4.13) are lower than in other local authorities, particularly those in central London, but services are being developed with partners to address the local level of rough sleeping.

Fig 4.13 Annual Rough Sleeping Estimate for Harrow

Year	Number of rough sleepers
2010	1
2011	1
2012	2
2013	4
2014	4
2015	6
2016	10
2017	10
2018	13

Source MHCLG

In 2018 there were 13 rough sleepers, representing a rough sleeping rate of 1.5 per 10,000 households. Of the 13 rough sleepers identified 10 were male and 3 were female, all were aged 26 or over and 5 were UK nationals, 6 were EU non-UK nationals, 1 was a non-EU national and 1 was ‘nationality unknown’.

### National and Local Data Collection

There is currently no dedicated ongoing national data collection for the total numbers of people sleeping rough in England throughout the year.

In London, street outreach teams record all rough sleeping activity and produce regular reports. The Combined Homelessness and Information Network (CHAIN) is a multi-agency database recording information about rough sleepers and the wider street population in London. CHAIN is commissioned and funded by the Greater London Authority (GLA) and managed by St Mungo’s Charity.

The CHAIN Annual Report shows the 'flow, stock, returner' model for the number of people seen rough sleeping in Harrow (fig 4.14) where flow means new rough sleepers, stock means those seen across at least two consecutive years and returner means those seen before but with gaps in their rough sleeping histories.

**Figure 4.14 Number of Rough Sleepers in Harrow**

Year	Flow	Stock	Returner	Total
2010/2011	-	-	-	5
2011/2012	-	-	-	21
2012/2013	-	-	-	32
2013/2014	-	-	-	48
2014/2015	-	-	-	45
2015/2016	60	1	4	65
2016/2017	32	6	5	43
2017/2018	29	0	4	33
2018/2019	21	4	5	30

Source: CHAIN

Of the 30 rough sleepers identified in Harrow in 2018/19, 24 were male and 6 were female. 4 were aged 18-25 years, 4 were aged 26-35 years, 9 were aged 36-45 years, 10 were aged 46-55 years and 3 were aged over 55 years.

In terms of nationality 13 were from the UK, 9 were from the CEE and 8 were from other countries. In terms of ethnicity 7 were White British, 4 were White Irish, 10 were White Other, none were Black, 8 were Asian and 1 was Mixed.

The rough sleepers identified had a range of support needs. 8 had support needs relating to alcohol, 3 had support needs relating to drugs, 8 had support needs relating to their mental health, 3 had no support needs relating to alcohol, drugs or mental health. 1 had an Armed Forces background, 1 had been in care and 8 had been in prison. 11 had no experience of armed forces, care or prison.

### FirmFoundation

FirmFoundation is a local charity based in Harrow working with homeless people. The services provided include the weekly signposting drop-in, the weekly day centre drop-in, the Winter Night Shelter (January to March), outreach and floating support and Hope Place supported housing.

47 people used the night shelter in 2019 (fig 4.15) and 39 of these had a local connection. Many of these individuals will not be included in CHAIN data so they are not 'verified' rough sleepers.

The Shelter provided bed spaces for a total of 38 men and 9 women. The youngest guest was aged 18 years and the oldest was 67 years old.

Guests from the UK made up just under 40%, a 20% decrease from the previous year. Non-UK rose by 18% and EEA Nationals by 2%.

21% of the Winter Shelter 2019 guests presented with mental health issues.

Fig 4.15 Firm Foundation Winter Night Shelter Use

<b>Year (Jan to March only)</b>	<b>Total Number Using the Shelter</b>	<b>Number with a Local Connection</b>
2011	31	15
2012	22	17
2013	17	13
2014	30	21
2015	20	12
2016	30	21
2017	39	27
2018	33	24
2019	47	39

Source: FirmFoundation

FirmFoundation data indicates an estimated 20 to 25 rough sleepers in Harrow on any given night, taking into account individuals using the drop-in services and those known to the organisations but who do not engage.

Many rough sleepers choose secluded locations and do not divulge their sleep sites so may not be included in estimated street counts and other data sources.

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# HARROW'S HOUSING EVIDENCE BASE NEW SUPPLY

# HARROW'S HOUSING EVIDENCE BASE – NEW SUPPLY



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## HARROW'S HOUSING EVIDENCE BASE – NEW SUPPLY

### Affordable Housing Supply

Although land for development in Harrow is in limited supply, the Council works hard with development and investment partners to improve the quantity and quality of new and existing affordable housing in the Borough.

The Greater London Authority (GLA) defines affordable housing as housing provided to eligible households whose needs are not met by the market and which should meet the needs of eligible purchasers or renters including availability at a cost low enough for them to afford, determined with regard to local incomes and local housing prices. There should be provision for the home to remain at an affordable price for future eligible purchasers or renters, or for the subsidy to be recycled for alternative affordable housing provision.

The GLA allocates funding to Registered Providers (RPs) for new affordable homes in London, and homes funded under the current funding programme are expected to be primarily composed of three affordable products:

- **London Affordable Rent** – This is housing that is required to be provided at a rent that is:
  - (a) Including Service Charges, up to 80% of local market rents and (in London);
  - (b) Excluding Service Charges, no higher than the benchmark rents published by the GLA annually in accordance with the Mayor's Funding Guidance.London Affordable Rent properties are allocated to households by the Council to meet housing need.
- **London Living Rent** – This offers Londoners on low to moderate incomes a below-market rent to enable them to save for a deposit to buy their own home. It is provided on a time-limited tenancy at rents not exceeding the relevant maximum rents published by the GLA annually, after which the renter can purchase the property on a shared ownership basis.
- **London Shared Ownership** – This is a 'part rent/part buy' arrangement where the purchaser takes out a mortgage on an initial share of the property (minimum 25%) and pays rent on the remaining share. They have the right to increase their share over time up to 100% ownership, or dispose of the unit on the open market. This housing is also aimed at low to moderate income households who wish to own their own home but cannot afford to purchase a property on the open market.

The GLA sets targets for average income requirements to ensure London Living Rent and London Shared Ownership housing is provided at an affordable level.

## Targets and Delivery

### London Plan Overall Housing Delivery Target

The current London Plan overall housing delivery target for Harrow is 593 dwellings per year, but the draft New London Plan (2019) proposes to increase this to 1,392 dwellings per year. This significant increase was challenged through the Examination in Public process. It is currently unclear what the figure will be in the final version of the New London Plan, as both the Mayor and the Government advocate a significant increase in housing targets and delivery across London.

The recently introduced Housing Delivery Test indicates that for the three years covering 2015/16 to 2017/18, 2,309 dwellings were completed in Harrow, compared to a target of 1,322 dwellings over that period. This meant that Harrow delivered 175% of its overall housing target, compared to the London-wide average of 94%.

The draft New London Plan proposes a strategic target of 50% affordable housing, with a minimum threshold of 35% on individual developments. Any provision less than 35% will be subject to viability testing, and grants will be used where possible to increase affordable housing above that rate. The 35% threshold is anticipated to increase over time as the development land market adjusts to reflect this policy requirement.

### The Council's Affordable Housing Delivery Target

The Council's Core Strategy has set a target of 40% of all new housing from all sources to be affordable housing. This is sought through a range of sources, including those secured through the Planning system, housing provided as part of the Council's own housebuilding programme or those of RP partners and other sources. It should be noted that some housing delivery, from sources such as conversions and change of use (resulting in less than 10 units) and the Prior Approval Process, which contributes to the overall housing delivery figure, are not required by policy to include affordable housing.

The target of 40% is split by tenure, with a mix of 60% London affordable rent and 40% low cost home ownership (e.g. London Shared ownership / London Living Rent housing). Whilst we are meeting the tenure split mix, we have not met Harrow's 40% affordable housing target since 2013, with 16% gross affordable housing being secured on sites from all sources (12% net of demolitions). This figure rises to 24% gross (19% net) when calculated only against sites that trigger affordable housing policy requirements, and the low level of delivery (detailed below) has been due to market uncertainty and viability issues on individual schemes.

## Completions

The number of completions varies considerably from year to year, but over the last 7 years just 12% of net completions<sup>1</sup> from all sources were affordable housing (fig 7.1). These include newly built properties plus completions achieved by conversions or change of use (including prior approval permitted development), which are not required by policy to deliver any affordable housing.

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<sup>1</sup> Illustrations are based on 'net' housing units provided. This is calculated by subtracting the number of units replaced from the total number of units provided. Gross units provided is the total number of properties built.

Fig 7.1 Gross and Net Completions from all Sources

Year	Gross completions	Gross affordable completions	Net completions	Net affordable completions
2012/13	852	364	738	302
2013/14	355	33	283	15
2014/15	454	96	317	36
2015/16	1,238	161	1,091	68
2016/17	731	4	655	3
2017/18	841	92	738	67
2018/19	1,338	178	1,226	137
Total	<b>5,809</b>	<b>928</b>	<b>5,048</b>	<b>628</b>
Affordable % of completions	<b>16%</b>		<b>12%</b>	

Source: AMR reports

In comparison, 19% of net new build completions were affordable housing (fig 7.2), which is still well below the Core Strategy 40% target for affordable housing.

Fig 7.2 New Build Gross and Net Completions

Year	Gross new build completions	Gross affordable new build completions	Net new build completions	Net affordable new build completions
2012/13	767	364	687	302
2013/14	200	33	166	15
2014/15	294	96	193	36
2015/16	794	161	681	68
2016/17	388	4	365	3
2017/18	499	92	461	67
2018/19	872	178	822	137
Total	<b>3,814</b>	<b>928</b>	<b>3,375</b>	<b>628</b>
Affordable % of completions	<b>24%</b>		<b>19%</b>	

Source: AMR Reports

It should be noted that the Draft New London Plan sets a target of 69% of overall housing delivery in Harrow to come from small sites (less than 0.25 hectares in size) which may not trigger an affordable housing policy requirement, making delivery against the 40% affordable housing target from all sources extremely challenging.

## Funding

Most of the supply since 2016 has come from affordable housing schemes where Harrow's RP partners have secured funding to develop sites they have acquired as either 100% affordable or as S016 contributions, usually with a mix of rented and shared ownership tenures. In some cases, private units are also developed to aid the overall viability of the scheme.

## Harrow's Housing Evidence Base – New Supply

The Mayor has also set specific grant funding amounts for the delivery of affordable housing and is now offering increased funding levels to Approved Providers for additional affordable housing starts of £70,000 per unit for London Affordable Rental units and £38,000 per unit for London Shared Ownership and London Living rent units, giving more certainty to housing providers as to grant allocations.

Between 2016/17 and 2018/19, 1,648 net new build properties were built in Harrow (fig 7.2). Of these properties, 207 were affordable housing, the majority of which were secured through private developments, i.e. as part of a Section 106 contribution. 84 were delivered through the Council's own programme.

### Density of New Developments

Housing density is measured using Habitable Rooms per Hectare (HRPH). Major developments (10+ dwellings) completed in Harrow between 2016/17 and 2018/19 achieved an average of 505 HRPH. The trend over this period of time was increasing density levels, with the average in 2016/17 being 407 HRPH compared to 718 HRPH in 2018/19. In year averages are, however, influenced by individual schemes, such as the 51 College Road development which is the Borough's tallest development to date and was completed in 2018/19. Excluding the 51 College Road development, the average density for 2018/19 was 512 HRPH.

In general terms, the density of new development across London has been at the upper end or above the relevant density ranges in the London Plan, and partly as a result of this, the draft New London Plan proposes to remove the density matrix and to rely on the design process to determine the most appropriate density for a development and its context.

### Completions by Number of Bedrooms

The increased density of housing developments in Harrow has led to more one and two bedroom flats having been built in recent years, particularly in high density town centre developments. This provided more units of accommodation on each piece of land and offered the developers better viability.

Affordable rent units carry a lower value for the developer, which reduces scheme viability and impacts adversely on the number of larger affordable properties a development can viably support. In 2018/19 822 new build properties (net) were completed within the Borough, up from 461 the previous year (figure 7.2). In 2018/19, 137 net affordable units were completed and only 15% of these were larger family-sized properties with 3+ bedrooms, down from 33% in 2017/18. There were no 3+ bedroom properties in 2016/17.

The London Plan 2016 does not set a fixed target of delivery for family sized provision, but it does state that these larger units should be provided as a priority.

### Pipeline Affordable Housing Completions

In order to plan for future affordable housing delivery, the Housing Regeneration Team keeps a record of likely future completions beyond the financial year. Information is compiled through dialogue with Planning colleagues and RP development contacts. It is expected that the number of affordable units completing over the next couple of years will rise above the level seen over the last 3 years, as some larger schemes come to completion and with traditional RP delivery being augmented by the Council's build and regeneration programme.

There has been a growth in Community Led Housing activity in the Borough in the last 2 years with 2 ongoing CLH projects and 1 Co-Housing project in their initial stages.

## Planning Permission

From 2016/17 to 2018/19 the number of Affordable units granted planning permission increased each year, with fluctuations in line with wider economic and housing market concerns (fig 7.3).

Fig 7.3 Permissions for Affordable Housing by Year (Gross Units)

Monitoring Year	Proposed Total Number of Housing Units (Gross)	Proposed No. of Affordable Units (Gross)	% Gross Affordable Units	No. of Schemes
2016/17	1,443	257	17.80%	9
2017/18	2,480	340	13.70%	7
2018/19	2,251	579	25.70%	6
Total	6,174	1,176		22

Source: Economic Development, Regeneration, Planning & Enterprise

In 2014/15, 62.0% of housing capacity with planning permission was not under construction / being implemented. By 2018/19 this had decreased to 58.4%.

## Council Building and Acquisition

Although 23% of London's population live in social housing, Harrow has the second lowest proportion at just 10% of its 90,000 households. At March 2019 there were 4,762 Council properties and 4,327 housing association properties. Harrow is ranked 287th out of 326 local authority areas in England and Wales where Rank 1 has the highest percentage of social housing.

In order to increase supply the Council is building new homes for the first time in decades. At September 2019, 98 new homes were either completed or under construction, with planning permission for a further 37 new homes on 'infill sites' on existing estates. Additional funding has been received for a total council house building programme of 639 new homes - 580 for social rent and 59 for shared ownership. This includes the regeneration of the Grange Farm estate, which will see 574 new homes built - 249 for social rent, 25 for shared ownership and 300 for private sale to offset costs.

The Council also launched an acquisition programme, with 100 homes bought on the open market between 2016/17 and 2017/18 to be used as Temporary Accommodation and 8 bought as permanent council housing. This programme is being expanded in 2019/20 by up to 32 additional properties, funding permitting.

The Housing Regeneration Team actively works with Planning colleagues as well as RP partners to maximise affordable housing delivery, and to progress the Council's own build programme, with priority being given to the provision of affordable rented units to meet the needs of those on the housing waiting list, which includes homeless households.

The Council will continue to investigate the feasibility of new delivery mechanisms such as private rental sector development, joint ventures, use of available GLA grant funding streams and Right to Buy retained receipts and the identification of surplus HRA land for affordable housing delivery. Harrow will seek to ensure best use of its existing recourses to bring forward new affordable housing development in the Borough.

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# HARROW'S HOUSING EVIDENCE BASE POPULATION

# HARROW'S HOUSING EVIDENCE BASE – POPULATION



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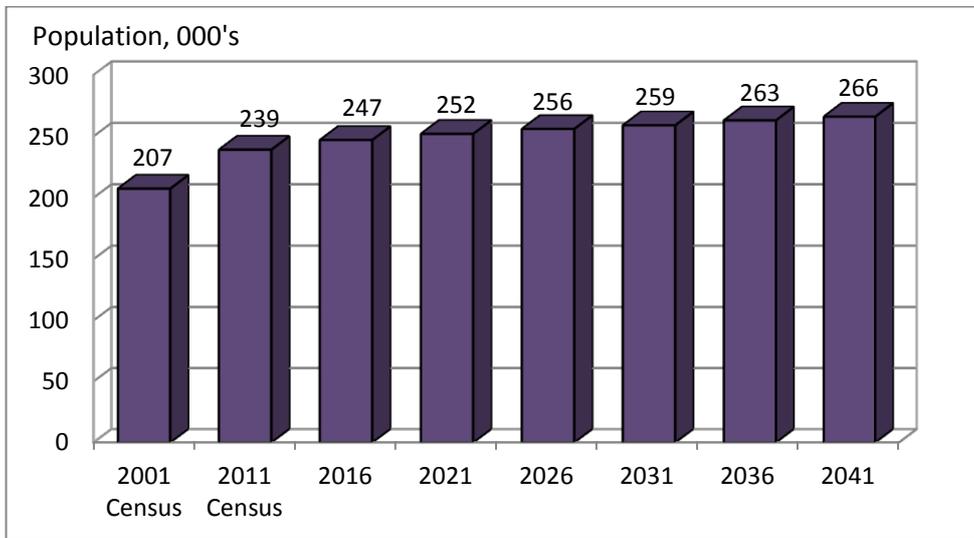
# HARROW'S HOUSING EVIDENCE BASE – POPULATION

## Population Change

Harrow's resident population at 30 June 2018 was estimated to be just over 250,000<sup>1</sup> living in 90,500 dwellings. This is an increase of 0.51% over the previous year, which increased by just 0.07% from mid-2016 to mid-2017. Growth over the last decade is 9%, lower than London's growth of 14% and higher than England's growth of 8%.

The 2011 Census showed that Harrow's population increased over the previous ten years by 15% to 239,000. ONS 2016-based household projections estimate a further population increase to 252,000 by 2021, rising to 266,000 by 2041, up by 11% since 2011 (fig 1.1).

Fig 1.1 Population Change, 2001 - 2041 estimate



Source: ONS 2016-based Household Projections, May 2019, ONS Census 2001 and 2011

## Household Size

At the 2011 Census Harrow had the second largest household size of England's 360 local authorities at 2.78 persons per household (Newham had the largest at 3). This is predicted to rise to 2.82 by 2026 and then drop to 2.68 by 2041, still the third highest in the country behind Newham and Leicester. Most West London boroughs are also ranked highly, except Hammersmith and Fulham at 2.15 and Kensington and Chelsea at 2.01, the second lowest in the country to City of London at 1.83 (fig 1.2).

Fig 1.2 Average household size

Borough	Rank 2016	2016	2021	2026	2031	2036	2041
Newham	1	3.08	3.15	3.04	2.95	2.89	2.84
Harrow	2	2.86	2.89	2.82	2.76	2.72	2.68
Brent	4	2.83	2.84	2.78	2.72	2.67	2.63
Hillingdon	6	2.74	2.79	2.75	2.71	2.66	2.62
Ealing	11	2.73	2.75	2.69	2.63	2.59	2.56
Hounslow	13	2.69	2.70	2.64	2.59	2.54	2.51
Hammersmith and Fulham	253	2.26	2.27	2.23	2.20	2.17	2.15
Kensington and Chelsea	359	2.01	2.02	1.99	1.96	1.93	1.91

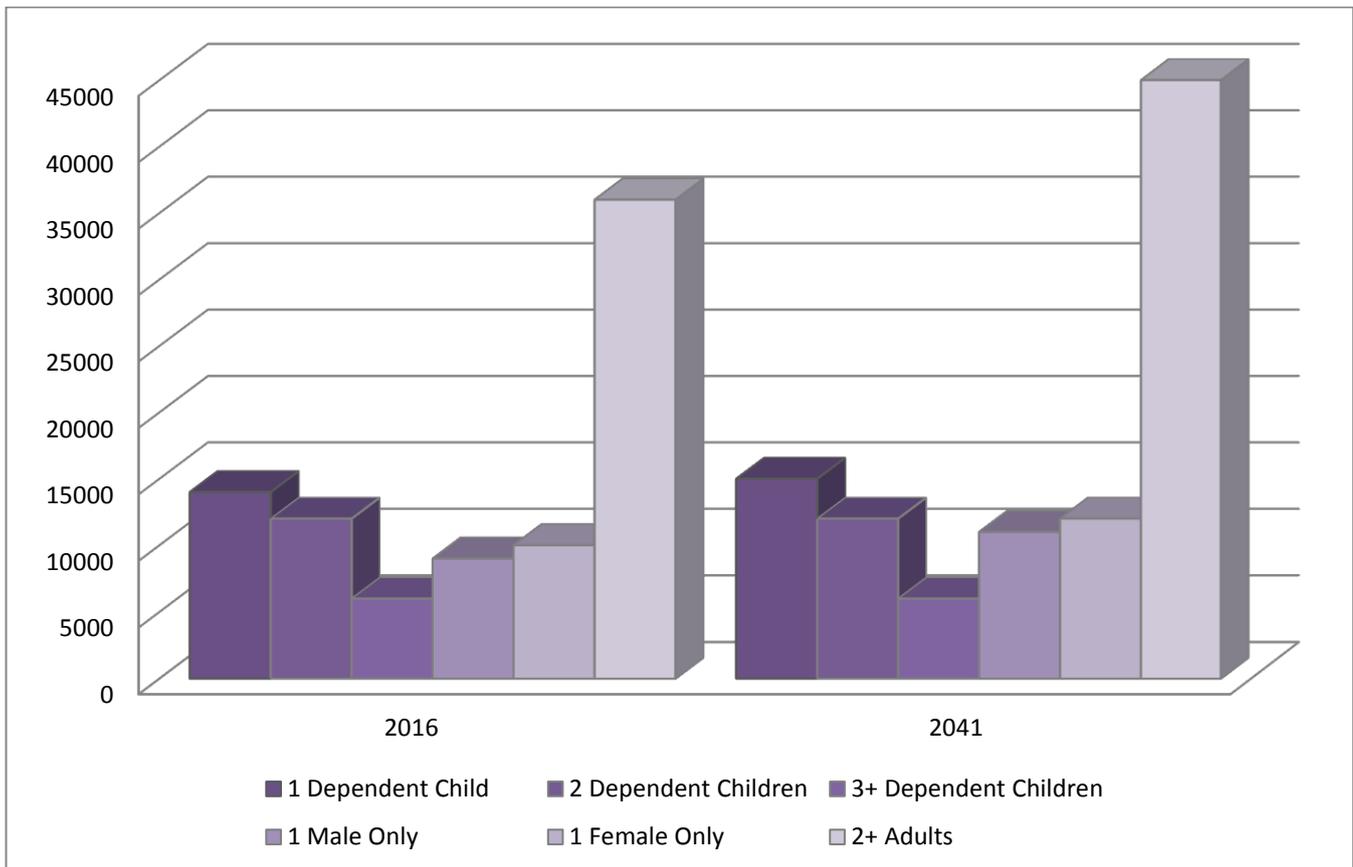
Source: ONS 2016-based Household Projections, May 2019

<sup>1</sup> 2018 ONS Mid-Year Population Estimates

### Household Composition Projections

ONS projections suggest that as the population grows there will be changes in household composition (fig 1.3). It is likely that there will be an increase of over 20% in single person households (from 19,000 to 23,000) and a 25% increase in households comprising of 2 or more adults, from 36,000 to 45,000, by 2041. This group includes 'houses in multiple occupation' where at least 3 people who are not from 1 'household' live together sharing facilities. The planning of future housebuilding will need to take into account these changes in household composition.

Fig 1.3 Household Composition Projections, 2016 - 2041



Source: ONS Household Projections for England, 2016-based

### Protected Characteristics

Harrow prides itself on being one of the most diverse boroughs in the country with people of many different backgrounds and life experiences living side by side.

### Population by Age Group

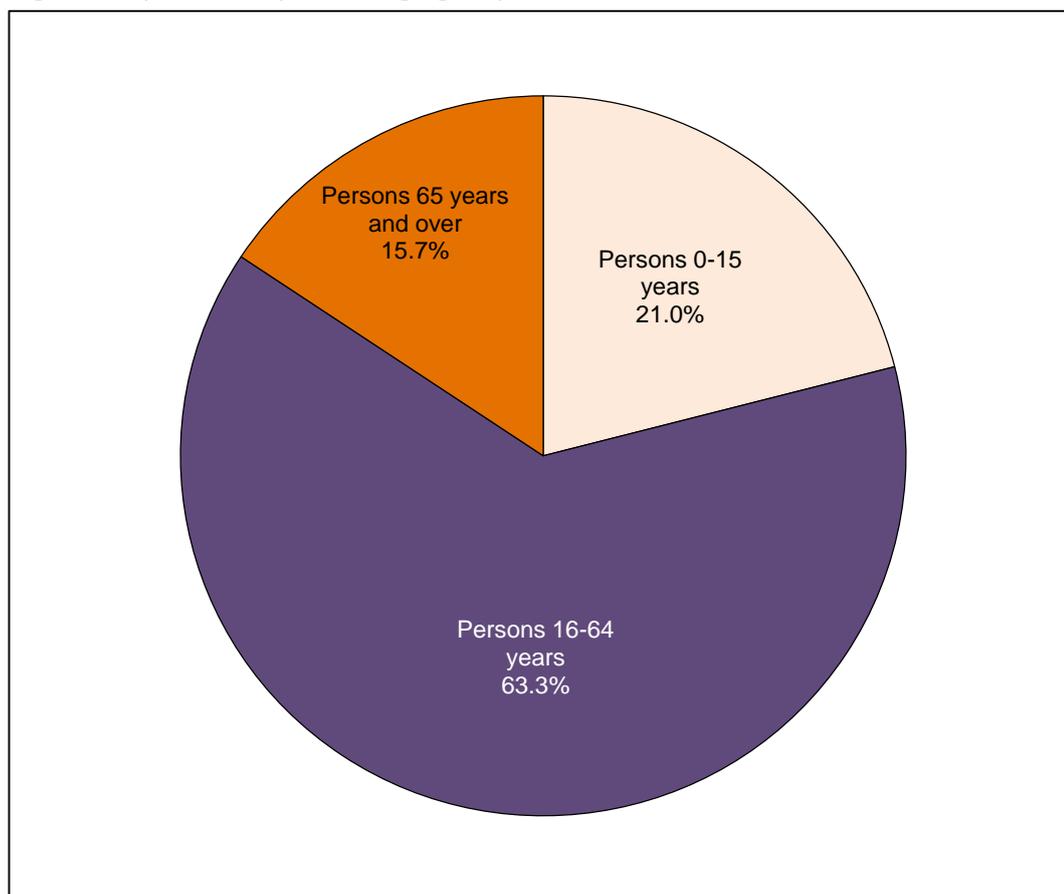
21% (52,578) of Harrow's residents are aged under 16 (fig 1.4). Both the number and percentage of 0 to 15 year olds have been increasing in the Borough since 2001, when there were around 41,690 young residents in Harrow. Since 2001 there has been a 26.1% (10,888) increase in the 0 to 15 year old age group. At 21%, Harrow's proportion of Under-16s is above both the London average of 20.6% and the national average of 19%.

13.9% (34,833) of all Harrow's residents are of school age (5-15), 633 more than in 2017 when 13.7% were of school age. Compared with London (13.7%) and England (13.1%), Harrow had a higher proportion of residents of school age in 2018. However, the estimates include school boarders in the

Borough such as at Harrow School. They will conversely exclude any children living/studying away from their Harrow home.

63.3% (158,369) of Harrow's population fall within the working age group (16 to 64), which is the lowest proportion of working age residents to the Borough's total population since this dataset began in 2001. The number of working age residents fell by 171 to mid-2018, though this was much less of a decline than the previous year's figure of just over a thousand. Since 2001 Harrow's working age population group has actually increased by nearly 20,200 residents, with most of this growth occurring between 2001 and 2011. In the 2018 Mid-Year Estimates Harrow's proportion of residents of working age was below the London level of 67.5%, but above the level for England at 62.7%.

Fig 1.4 Population by broad age groups, 2018



Source: 2018 ONS Mid-Year Population Estimates

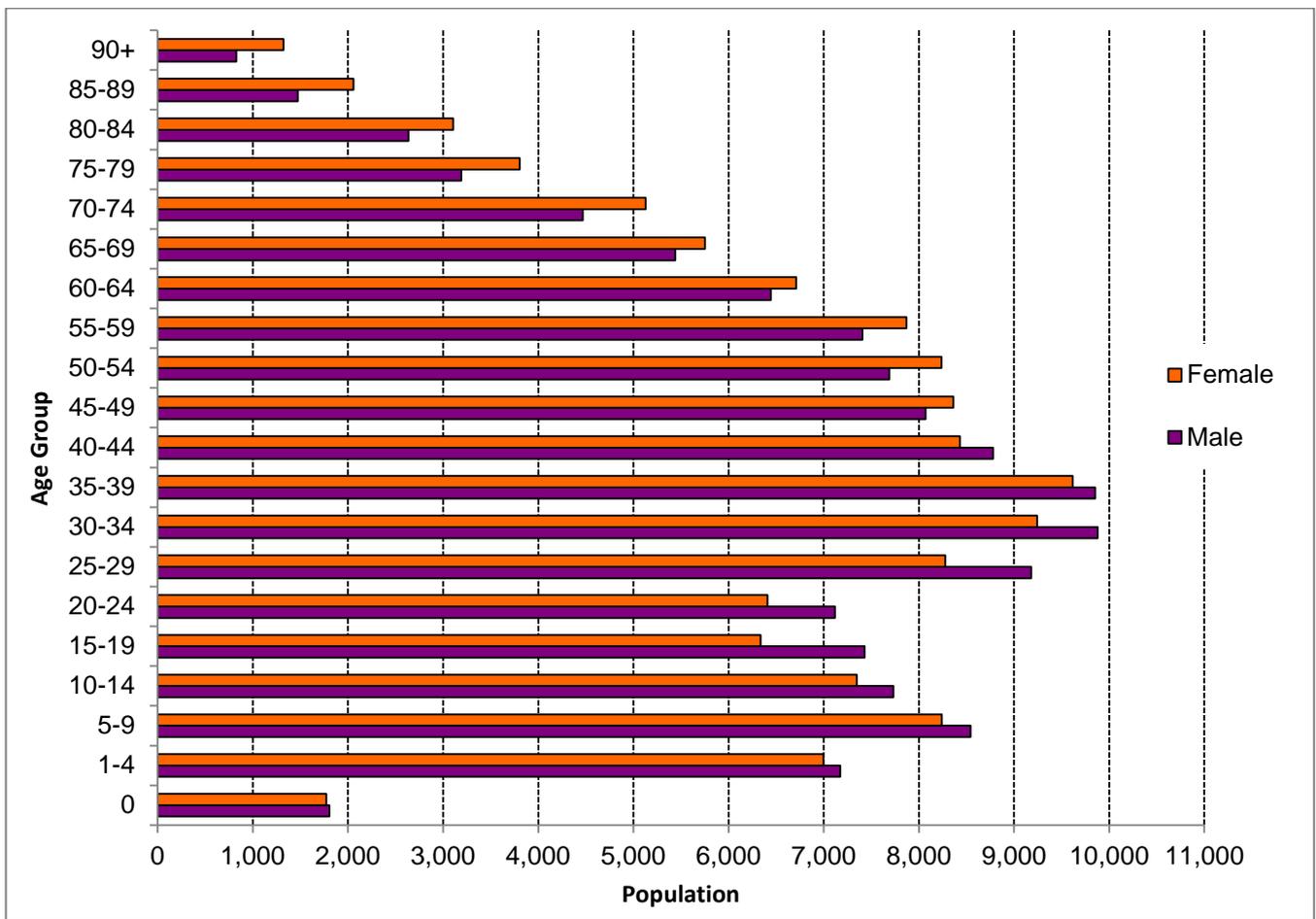
The number and proportion of older people in Harrow continue to increase. 15.7% (39,202) are now aged 65 and over, compared with: 15.1% (37,650) in 2016; 15% (36,910) in 2015; and 14.8% (36,330) in 2014. In 2001 around 30,000 of Harrow's residents were aged 65 and over, so there has been approximately 30% growth from 2001 to 2018. Harrow's mid-2018 level of 15.7% is higher than London's level (11.9%), but lower than the national level (18.3%).

There are more males than females as a percentage of the population for age categories up to 40-44 years old (figs 1.5 and 1.6). Beyond this age, there are proportionally more females. Overall, the number of males and females living in Harrow is very similar.

The largest proportional increase for all age groups between mid-2017 and mid-2018 was in the 70-74 year olds category, with a growth of 4.6%. In percentage terms elderly age groups showed relatively high growth rates with 85-90 year olds increasing by 3.2% (+ 111) and 90+ year olds increasing by 3.0% (+62). The number of Harrow residents aged 80 and over continues to grow, although the rate has reduced, at 2.0% compared with 2.8% for both 2016/17 and 2015/16. Overall those aged 65 and over increased by nearly 785 (2%), in line with the previous two year's figures of 770 and 740 (both 2%).

Numerically 10-14 year olds had the second largest increase (+386, 2.6%). The 25-29 year old group experienced the greatest decline at 3.5%. Over the past decade the Borough's population has increased by around 9% (20,582). This is lower than London's growth of 14% over the same period, and higher than England's growth of 8%.

Fig 1.5 Population by Age Groups, 2018



Source: ONS 2018 Mid-Year Estimates

Fig 1.6 Population by Age Groups %, 2018

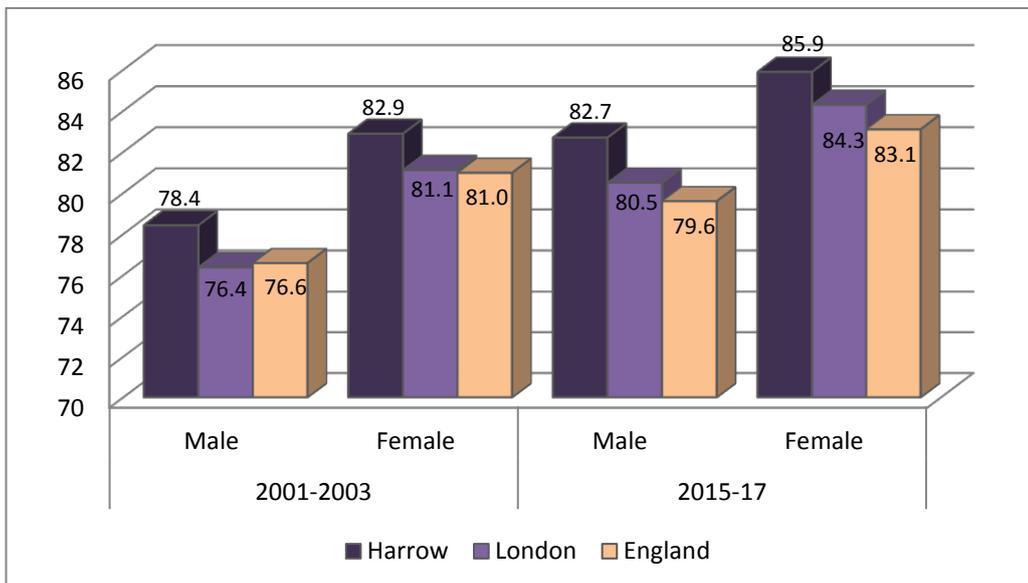
Age	Male	% male	Female	% female	All
0	1,805	50.5	1,772	49.5	3,577
1-4	7,173	50.6	6,995	49.4	14,168
5-9	8,544	50.9	8,239	49.1	16,783
10-14	7,732	51.3	7,348	48.7	15,080
15-19	7,431	54.0	6,336	46.0	13,767
20-24	7,118	52.6	6,410	47.4	13,528
25-29	9,179	52.6	8,278	47.4	17,457
30-34	9,878	51.7	9,241	48.3	19,119
35-39	9,852	50.6	9,615	49.4	19,467
40-44	8,779	51.0	8,431	49.0	17,210
45-49	8,069	49.1	8,363	50.9	16,432
50-54	7,688	48.3	8,238	51.7	15,926
55-59	7,408	48.5	7,870	51.5	15,278
60-64	6,443	49.0	6,712	51.0	13,155
65-69	5,439	48.6	5,751	51.4	11,190
70-74	4,469	46.6	5,129	53.4	9,598
75-79	3,191	45.6	3,805	54.4	6,996
80-84	2,635	45.9	3,105	54.1	5,740
85-89	1,473	41.7	2,057	58.3	3,530
90+	827	38.5	1,321	61.5	2,148
<b>Total</b>	<b>125,133</b>	<b>50.0</b>	<b>125,016</b>	<b>50.0</b>	<b>250,149</b>

Source: ONS 2018 Mid-Year Population Estimates

### Life Expectancy by Gender

Average life expectancy for those born in Harrow between 2015 and 2017 is 82.7 years for males and 85.9 for females. This is the third highest in London which averages 80.5 and 84.3 respectively, and above the England averages of 79.6 and 83.1 respectively. It has risen significantly above the 2001-2003 Harrow averages of 78.4 and 82.9 years respectively (fig 1.7).

Fig 1.7 Life Expectancy in Harrow, London and England, 2001-03 & 2015-17

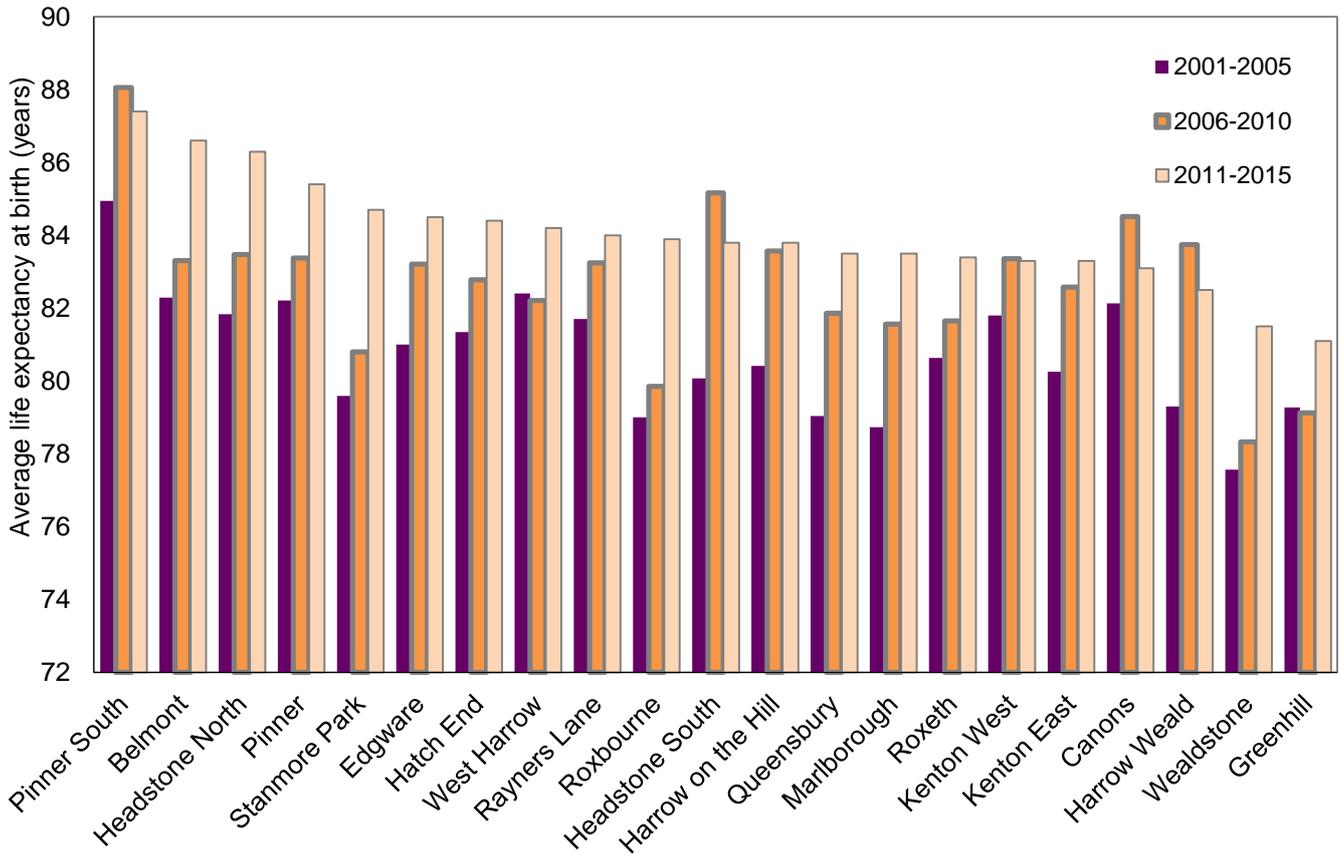


Source: Life expectancy at birth and at age 65 years by local areas, ONS

### Life Expectancy by Ward

All wards have increased their life expectancy since 2001 but they differ across the Borough (fig 1.8) and this could be linked to levels of deprivation. At 87.4 years, residents of Pinner South ward can expect to live over 6 years longer on average than those in Greenhill at 81.1, the only ward in Harrow with a life expectancy below the national average.

Fig 1.8 Life Expectancy by Ward



Source: Public Health, England

### Ethnicity

Harrow has one of the most ethnically diverse populations in the country (fig 1.9). Harrow's largest ethnic group is Indian<sup>2</sup> at 28.6%, up from 26.4% in 2011. This is followed by White British at 24.2% which is down from 30.9% in 2011 (when it was the 4<sup>th</sup> lowest ranked in England and Wales) and less than half the percentage of 2001, when White British residents formed 50% of the Borough's population. 62.7% of Harrow's residents are now from Black, Asian and other minority ethnic groups (excluding minority White groups). 10.4% of residents are 'White Other', up from 8.2% in 2011 and just 4.5% in 2001. Only 55.2% of residents were born in the UK, the 6<sup>th</sup> lowest ranking in the 2011 Census. Harrow was ranked first for both residents born in Africa (11.7% with 4.9% born in Kenya) and in Romania (2%). 9% were born in India, ranked 4<sup>th</sup>.

<sup>2</sup> GLA, 2018

Fig 1.9 Ethnic Make-Up of Harrow, 2018

<b>Ethnicity</b>	<b>Number</b>	<b>%</b>
White British	61,679	24.2
White Irish	6,920	2.7
Other White	26,566	10.4
White & Black Caribbean	2,764	1.1
White & Black African	1,210	0.5
White & Asian	4,253	1.7
Other Mixed	3,510	1.4
Indian	73,122	28.6
Pakistani	9,846	3.9
Bangladeshi	1,650	0.6
Chinese	2,373	0.9
Other Asian	30,609	12
Black African	8,867	3.5
Black Caribbean	7,197	2.8
Other Black	5,749	2.3
Arab	4,836	1.9
Any Other Ethnic Group	4,217	1.7

Source: GLA, 2018

## Language

The top 5 most recorded community languages in Harrow are: English, Gujarati, Tamil, Romanian and Arabic, with over 155 languages spoken in Harrow schools. English is the main language spoken by everyone over 16 in only 67% of households, the 9th lowest ranking at the 2011 Census. 15.9% of households had nobody speaking English as their main language, the 10th highest ranking.

## Religion

At the 2011 Census Harrow was the most religiously diverse borough in the country, with the 2<sup>nd</sup> lowest ranking for 'no religion', the 5<sup>th</sup> lowest proportion of Christians at 37.3% and the highest proportion of Hindus, Jains and members of the Unification Church. It also had the second highest figures for Zoroastrianism and was ranked 6th for Judaism.

## Disability

In the ONS Annual Population Survey 2017 13.7% of Harrow's working age population classified themselves as disabled, a total of 22,100 people<sup>3</sup>. 6,470 individuals, 2.6% of the total population, received Disability Living Allowance. 2,302 people (about 1% of the population) received long term social care services primarily for physical support needs during 2016/17. An additional 86 people received long term support primarily for sensory impairments. There were 575 Harrow residents receiving long-term social care support from Harrow Adult Social Care Services for learning disabilities. 518 (approximately 90%) were younger adults under the age of 65<sup>4</sup>. 18% of younger adults with learning disabilities were in paid employment during the year. In comparison to London (7.2%) and England (5.7%), Harrow has a high number of LD clients who are in employment. In 2016-17, 73% of

<sup>3</sup> Our Harrow, Our Community – Equality Profile, 2017/18

<sup>4</sup> SALT

younger adults with learning disabilities were in settled accommodation (with security of tenure). This is slightly below the England average (76%), but is above that of London (71%).

### **Pregnancy and Maternity**

In 2016 there were 14.5 live births per 1000 population<sup>5</sup> which is higher than the UK average of 11.8. The fertility rate is 2.03 children per woman, higher than the UK average of 1.79. For women under the age of 18, the birth rate was 3.7 per 1000 population which is in line with the London average of 3.8 and lower than the UK average of 5.7. Harrow has the lowest levels of live births outside of marriage in the country (19.4%).

### **Marriage, Civil Partnerships and Same Sex Marriage**

54% of Harrow residents are married, which is the highest rate in London.<sup>6</sup> At 31 December 2016 there had been 142 Civil Partnerships in Harrow, 19 of which had been converted to marriage. There had been 32 same sex marriages in Harrow since inception on 29th March 2014.

### **Sexual Orientation**

It is estimated that around 10% of the UK population are lesbian, gay or bisexual, which would equate to approximately 25,000 of our residents.

### **Gender reassignment**

We do not hold information on gender reassignment in Harrow.

### **Deprivation**

The 'Indices of Multiple Deprivation' (IMD) are a collection of indicators (including income, employment, health and disability, education skills and training, barriers to housing and services, living environment and crime) which allow the level of deprivation within a particular area to be measured. The 2019 English Indicators of Deprivation are based on 2015/16 data.

Multiple deprivation in Harrow is well below the national average, with Harrow ranking 207th out of 317 districts in England in 2019, where 1st is the most deprived. In the 2015 indices, when the boundaries were slightly different, Harrow was ranked 213th out of 326 districts.

Harrow is the 7th least deprived the 33 London boroughs in the IMD 2019, down from 8th in the IMD 2015 and showing a marginal deterioration.

Lower Super Output Areas (LSOAs) are the smallest geographical area for which deprivation data is produced (figs 1.10 and 1.11) and all of these neighbourhoods in England are ranked between 1 and 32,844, with 1 as the most deprived. 2 of Harrow's LSOAs fall within the top 20% most deprived in England. These are in the wards of Stanmore Park (covering the Woodlands and Cottesmore estates) and Hatch End (including parts of the Headstone and Headstone Lane estates. None are in the most deprived 10%.

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<sup>5</sup> ONS Births by mothers' usual area of residence in the UK 2016

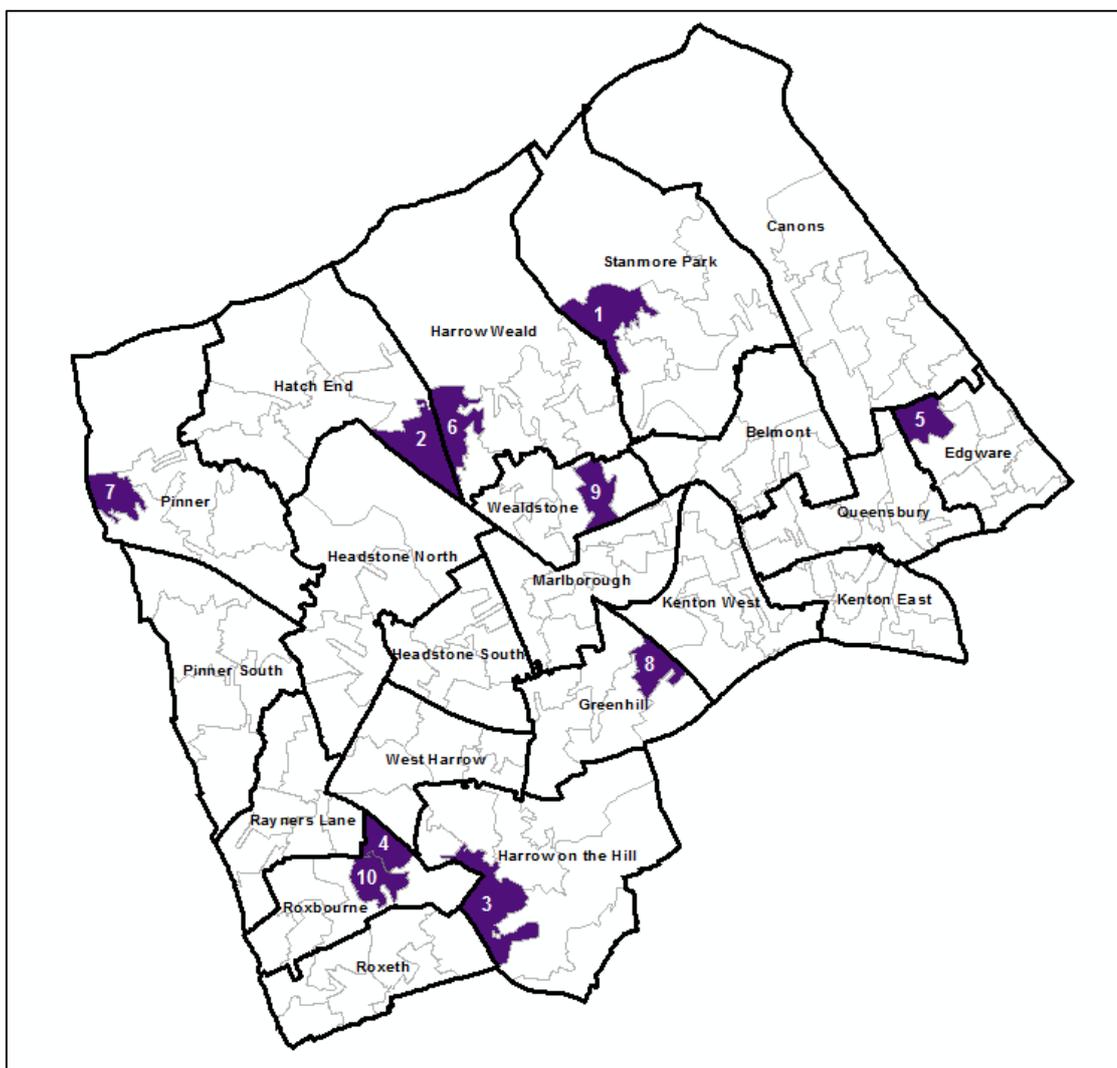
<sup>6</sup> Our Harrow, Our Community – Equalities Profile, 2017/18

Fig 1.10 Harrow's Top Ten Ranked LSOAs for Multiple Deprivation

LSOA	Ward	National Rank 2019	National Rank 2015	Rank Change	LSOA Rank in Harrow in 2019 (1 = most deprived)	LSOA Rank in Harrow in 2015 (1 = most deprived)
E01002227	Stanmore Park	4,814	5,441	Declined	1	2
E01002151	Hatch End	6,225	6,680	Declined	2	3
E01002133	Harrow on the Hill	6,641	8,053	Declined	3	7
E01002217	Roxbourne	6,812	5,370	Improved	4	1
E01002120	Edgware	7,228	8,019	Declined	5	6
E01002139	Harrow Weald	7,669	7,164	Improved	6	4
E01002185	Pinner	7,721	9,188	Declined	7	8
E01002131	Greenhill	8,650	10,210	Declined	8	12
E01002235	Wealdstone	9,047	7,188	Improved	9	5
E01002211	Roxbourne	9,388	10,114	Declined	10	11

Source: MHCLG, English Indices of Deprivation 2019

Fig 1.11 Map of Harrow's Top Ten Ranked LSOAs for Multiple Deprivation

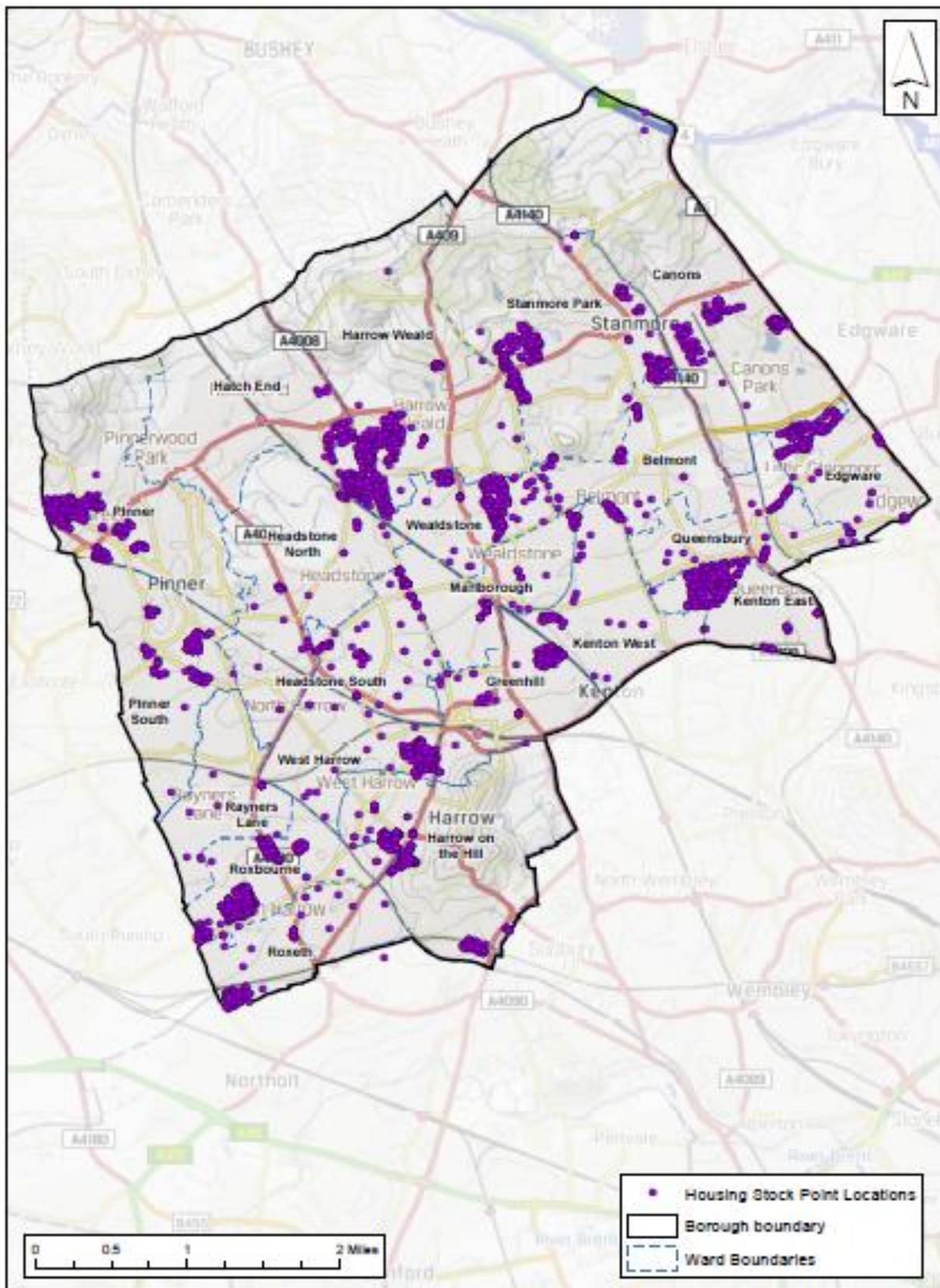


Source: MHCLG,

English Indices of Deprivation 2019

Levels of deprivation generally align with areas of the Borough where the Council's housing stock is concentrated (fig 1.12).

Fig 1.12 Harrow Council Housing Stock Concentrations by Ward, June 2019



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Created by Harrow Council's GIS Team 

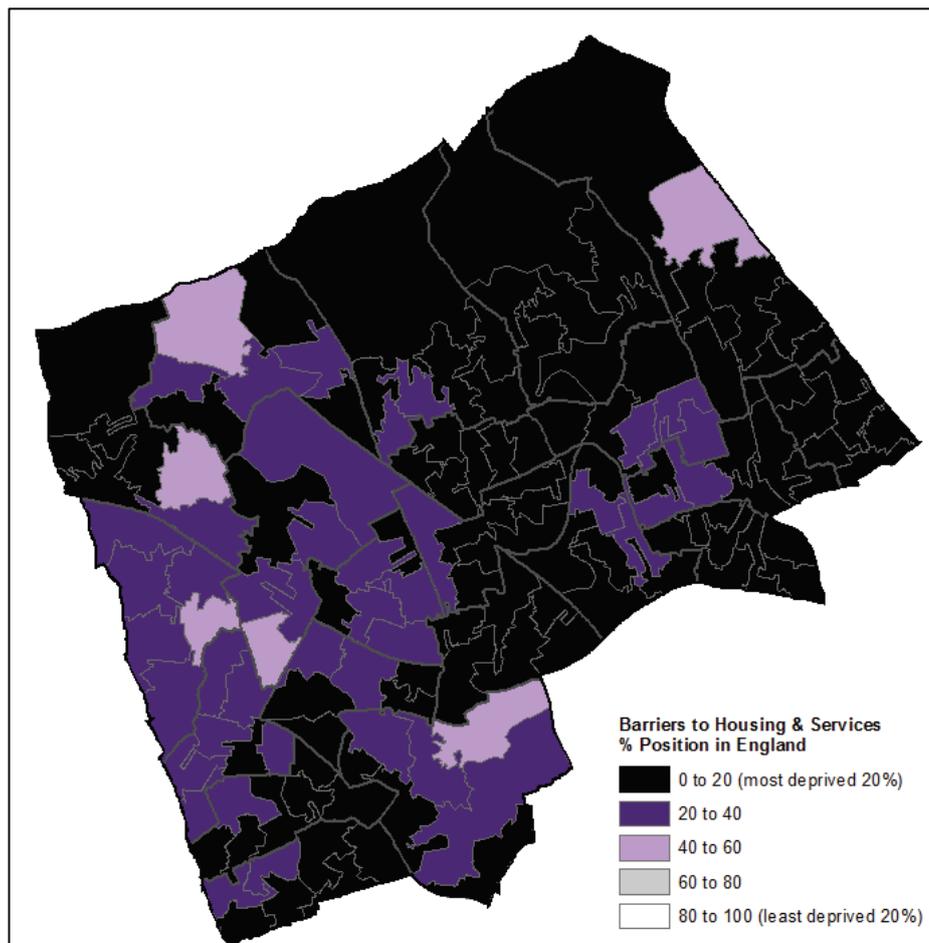
### Barriers to Housing and Services

This Domain measures the physical and financial accessibility of housing and local services. The indicators fall into two sub-domains: 'geographical barriers', which relate to the physical proximity of local services, and 'wider barriers' which includes issues relating to access to housing such as affordability. As in IMD 2015, Harrow's performance is worse for Barriers to Housing & Services than any other deprivation indicator. It is now ranked 15th worst out of 317 districts in England, and falls within the top decile of local authorities. It has also significantly worsened within London, now ranked 14th compared with 22nd in 2015.

Harrow has over a quarter (27.7%) of its LSOAs in the 10% most deprived nationally, and nearly two-thirds of LSOAs (65.7%) in the 20% most deprived, which is considerably more than in 2015. All LSOAs are in the 50% most deprived, with the exception of 1 LSOA located in Hatch End ward (fig 1.13).

Harrow's most deprived LSOA is located in Stanmore Park. This was also the most deprived area in 2015. It is now ranked 18th out of 32,844 LSOAs nationally. The LSOA ranked 2nd in Harrow is located in Canons - the most north-westerly LSOA in the Borough and covering large tracts of Green Belt with interspersed housing, as well as properties west of Marsh Lane in Stanmore. This LSOA was ranked second in Harrow in 2015 too.

Fig 1.13 Barriers to Housing & Services

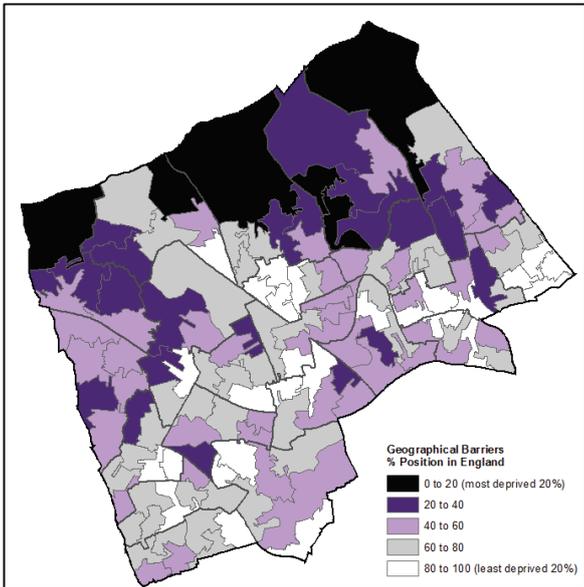


Source: MHCLG English Indices of Deprivation, 2019

### Geographical Barriers to Housing and Services

Geographical barriers relate to the physical proximity of local services. Harrow has no LSOAs in the most deprived 10% in England and just 6 in the most deprived 20%. Most of these are in the north of the Borough and generally more rural (fig 1.14).

Fig 1.14 Geographical Barriers to Housing & Services

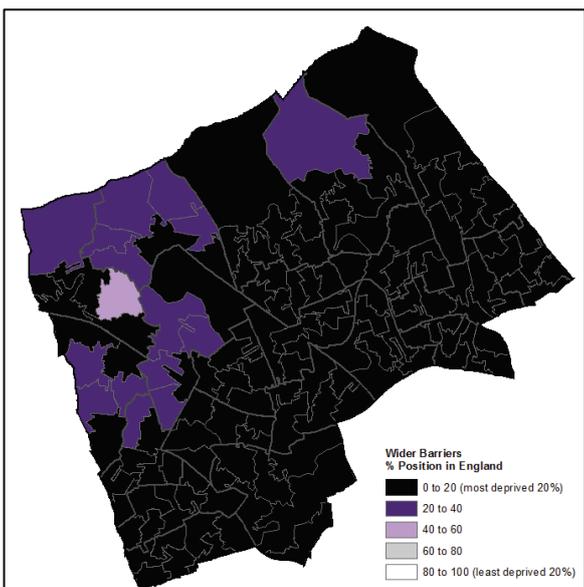


Source: MHCLG English Indices of Deprivation, 2019

### Wider Barriers to Housing and Services

Harrow scores very poorly for this sub-domain, which measures household overcrowding, homelessness and housing affordability (expressed as the inability to afford to enter owner occupation or the private rental market) and this has worsened since IMD 2015. Over half of LSOAs are in the most deprived 10% in England, and 88% are in the most deprived 20% of LSOAs in England (fig 1.15).

Fig 1.15 Wider Barriers to Housing & Services

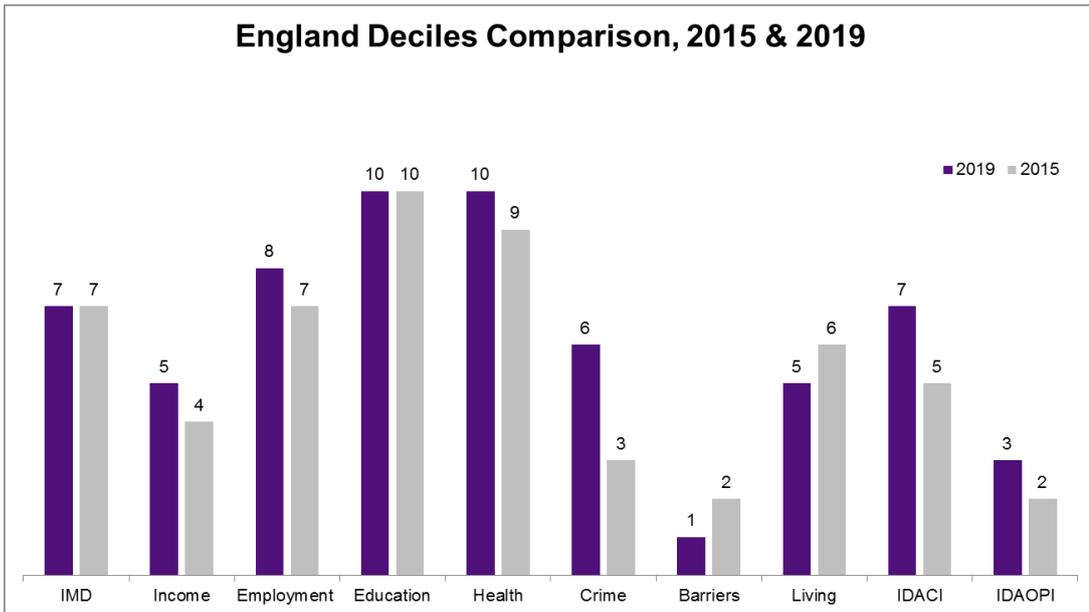


Source: MHCLG English Indices of Deprivation, 2019

### Other Indices of Deprivation

Harrow has improved its rankings within London in 6 of the other 9 Deprivation Domains. These are for Income, Employment, Education, Crime, Income Deprivation Affecting Children and Income Deprivation Affecting Older People. 2 Domains have slightly worsened in terms of London rankings – these are Health and Barriers to Housing & Services. The Living Environment ranking for Harrow within London is unchanged between 2015 & 2019. Harrow's 2nd worst performing Domain is Deprivation Affecting Older People (IDAOP), but there has been improvement in this indicator since IMD 2015. The Crime Index shows the greatest improvement out of all the domains for Harrow between IMD 2015 and IMD 2019 (fig 1.16).

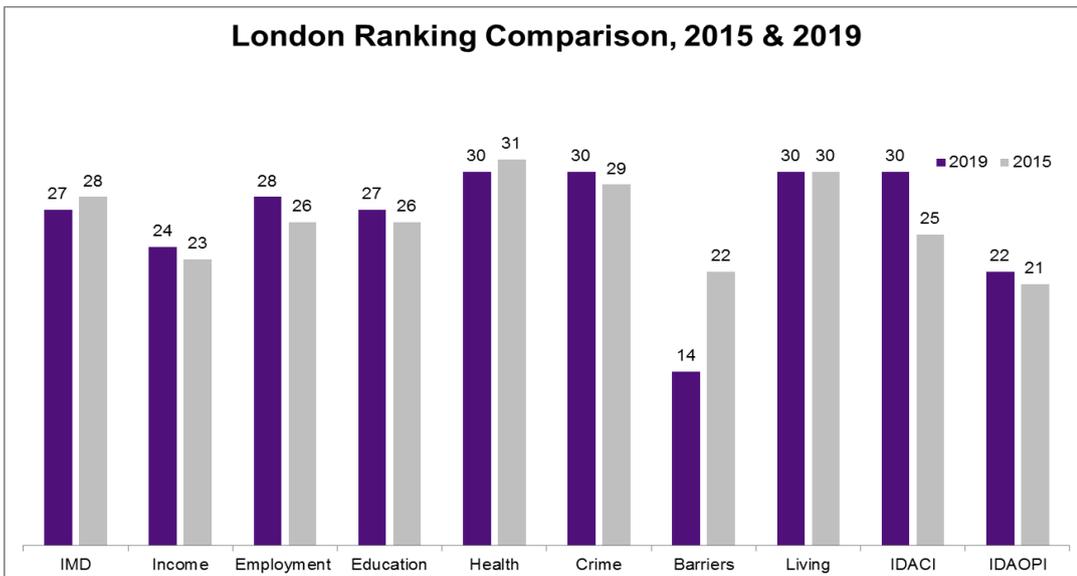
Fig 1.16 Other Indices of Deprivation, England Deciles 2015 and 2019



Source: MHCLG English Indices of Deprivation, 2019

Harrow has also improved its rankings within London (fig 1.17) for Income, Employment, Education, Crime and Deprivation Affecting Children (IDACI).

Fig 1.17 Other Indices of Deprivation, London Rankings 2015 and 2019



Source: MHCLG English Indices of Deprivation, 2019

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# HARROW'S HOUSING EVIDENCE BASE SOCIAL HOUSING

# HARROW'S HOUSING EVIDENCE BASE – SOCIAL HOUSING



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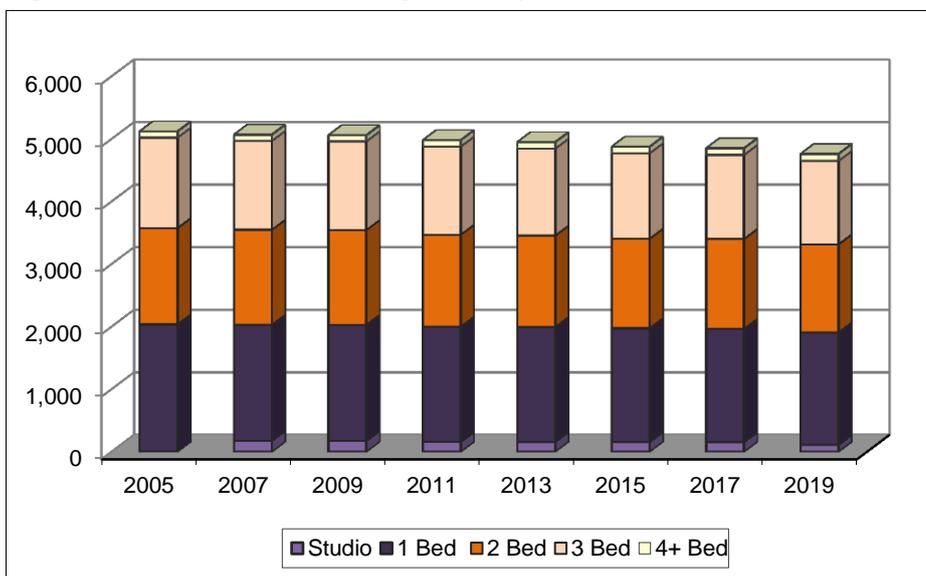
# HARROW'S HOUSING EVIDENCE BASE – SOCIAL HOUSING

## Social Housing Stock

Although 23% of London's population live in social housing, Harrow has the second lowest proportion at just 10% of its 90,000 households. At March 2019 there were 4,762 Council properties and 4,327 housing association properties. Harrow is ranked 287<sup>th</sup> out of 326 local authority areas where Rank 1 has the highest percentage of social housing.

One bedroom properties make up 38%, with around half of these being sheltered accommodation within 17 local authority sheltered housing schemes (rented) for older people. 2% of Council stock is studio accommodation, 2 bedroom properties make up 30%, 3 bedroom properties make up 28%, and only 2% of properties have 4 or more bedrooms (fig 5.1).

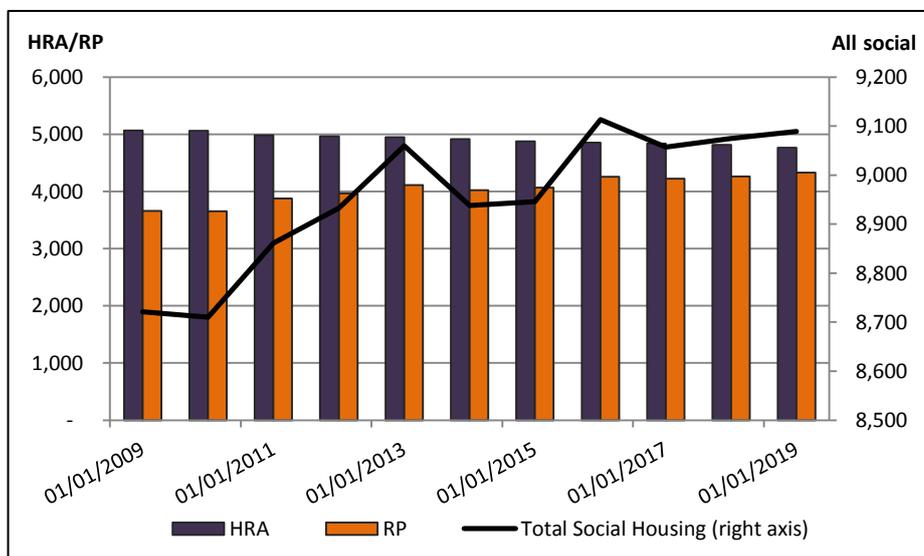
Fig 5.1 Harrow Council Housing Stock by Bedroom Size



Source: Northgate

At March 2019 there were 4,250 General Needs and 512 Sheltered properties in Harrow. In addition, there were 4,327 Registered Provider (RP) properties, also 5% of all housing stock (figs 5.2 and 5.3).

Fig 5.2 Harrow's Social Housing Stock - Council & Registered Provider Homes



Source: Northgate & RANS Team

The Council is building new homes for the first time in decades. At September 2019, 98 new homes were either completed or under construction, with planning permission for a further 37 new homes on 'infill sites' on existing estates. Additional funding has been received for a total council house building programme of 639 new homes - 580 for social rent and 59 for shared ownership. This includes the regeneration of the Grange Farm estate which will see 574 new homes built - 249 for social rent, 25 for shared ownership and 300 for private sale to offset costs.

Neighbouring West London boroughs all have a significantly larger housing stock and proportion of both council (LA) and housing association (RP) stock (fig 5.3).

Fig 5.3 Stock Levels of Social Housing in West London Boroughs, 2018

Borough	Stock	No. LA	% LA	No. RP	% RP
Brent	118,710	8,351	7.0	17,935	15.1
Ealing	133,350	11,947	8.9	11,651	8.7
Hammersmith and Fulham	88,140	12,227	13.9	13,273	15.1
Harrow	90,680	4,813	5.3	4,262	4.7
Hillingdon	109,780	9,925	9.0	7,589	6.9
Hounslow	100,740	13,129	13.0	8,254	8.2
Kensington and Chelsea	87,610	6,790	7.8	12,923	14.8

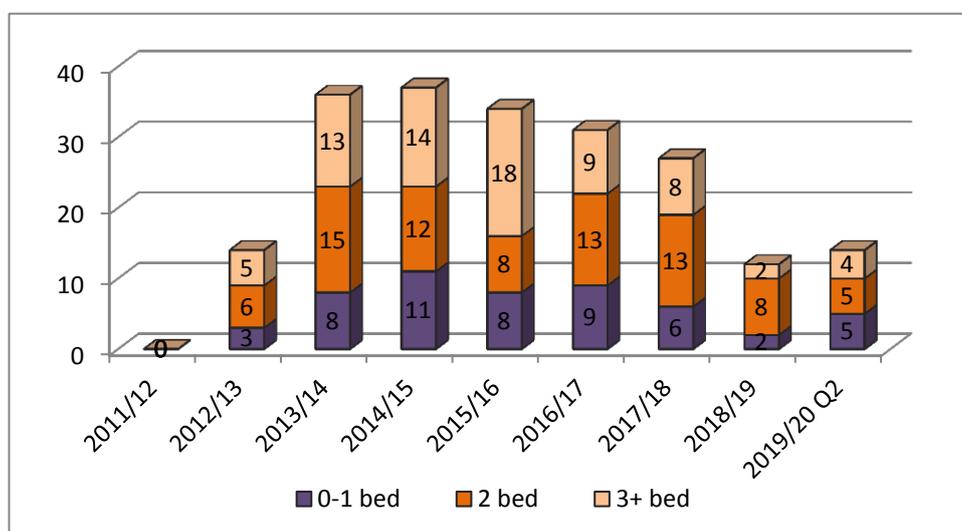
Source: MHCLG

### Right to Buy

Since 1980 the 'Right to Buy' (RTB) scheme has given secure council tenants and some HA tenants the legal right to buy the home they are living in at a discount, which is based on length of tenancy, type of property, value and location. The maximum discount in London in 2019 is £110,500, and this increases annually in line with inflation. There are many government restrictions on the use of RTB receipts that make it difficult to replace these properties. Social housing stock may be further reduced if RTB for housing association tenants is rolled out nationally.

Harrow lost 4,191 properties to Right to Buy from when it was introduced in 1980 to March 2019. Sales had slowed since 2014/15 (fig 5.4), but this decline has reversed during 2019/20, with more sold by Q2 than in the whole of 2018/19.

Fig 5.4 Properties Sold Under 'Right To Buy'

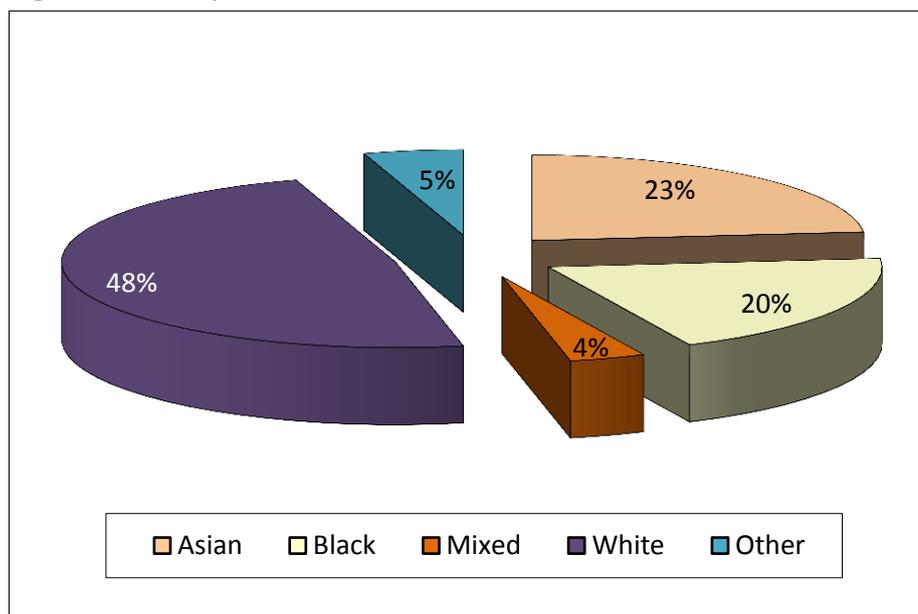


Source: Leasehold Team

### Council Tenants

At March 2019 there were 5,715 tenants (including joint tenants), living in 4,762 Council properties, approximately 2.4% of the total population in Harrow. Of the 85% who have disclosed their ethnicity, the largest single group housed within the Council's stock is White, making up 48% of known ethnicity. The next largest groups are Asian at 23% and Black at 20% (fig 5.5). This ratio is disproportionate to Harrow's population, but this may be due to the high proportion of longstanding tenants in a borough with a low churn of properties, very little social housing and the discharge of housing duty into the private sector since 2011.

Fig 5.5 Ethnicity of Council Tenants, March 2019



Source: Northgate

At March 2019, 22% of tenants were aged 16-45, 46% were aged 45-64 and 32% were aged 65+. 63% of these tenants are female and 37% male.

In addition to age, sex and ethnicity, protected characteristics<sup>1</sup> include disability, religion and sexual orientation, but tenants do not always disclose all of these, so some datasets are more complete than others (figs 5.6 to 5.9). For example, only 55% of tenants have disclosed their religion and only 38% have disclosed their sexual orientation.

Fig 5.6 Age & Gender of Tenants, March 2019

	Number	%
Aged <45	1,257	22.0
Aged 45-64	2,646	46.3
Aged 65+	1,812	31.7
Female	3,625	63.4
Male	2,091	36.6
Gender not disclosed	4	0.1

Source: Northgate

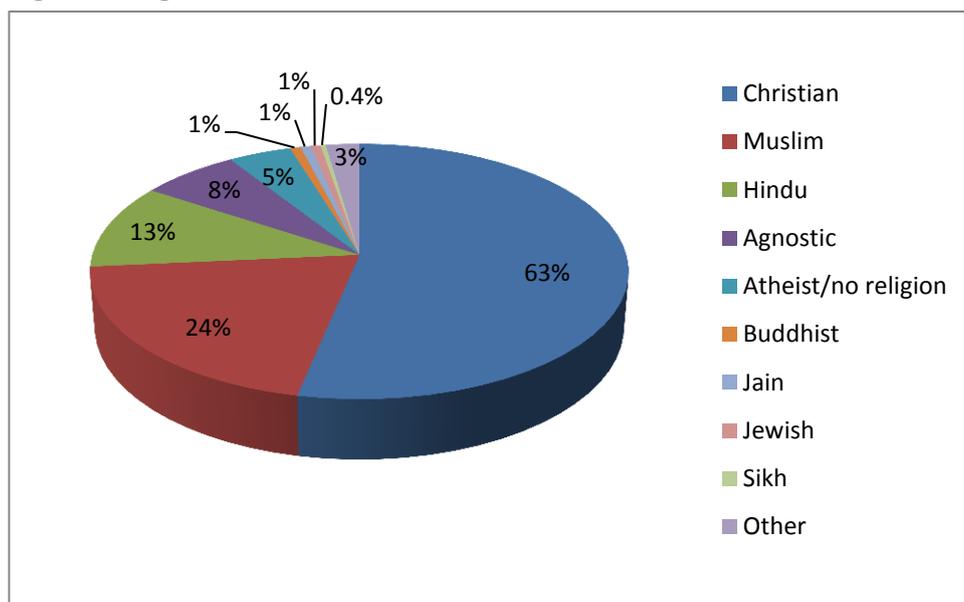
<sup>1</sup> It is against the law to discriminate against anyone because of age, ethnicity, religion, disability, being married or in a civil partnership, being pregnant or on maternity leave, sex, sexual orientation or gender reassignment, and these are called 'protected characteristics'

Fig 5.7 Disability of Tenants, March 2019

	Number	% of known
Disabled	1,099	38.1
Not disabled	1,785	61.9
Known	2,884	
% known		50.3

Source: Northgate

Fig 5.8 Religion of Tenants, March 2019



Source: Northgate

Fig 5.9 Sexual Orientation of Tenants, March 2019

	Number	% of known
Bisexual	22	1.0
Gay/Lesbian	10	0.5
Heterosexual	2,146	98.4
Other	2	0.1
Known	2,180	
% known	38.1%	

Source: Northgate

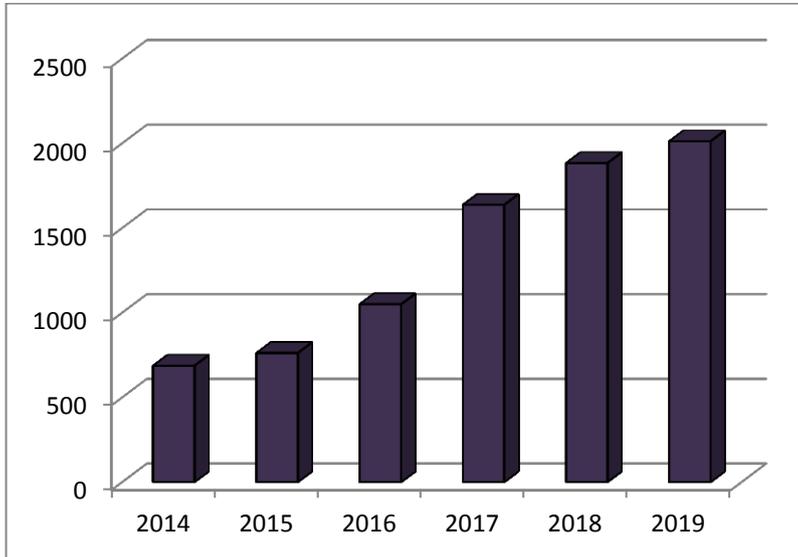
## Housing Register

Harrow's Housing Register is run through Locata, a choice-based social rented lettings scheme involving 5 local authorities and 13 RPs in West London.

Each applicant is assessed and those found to be eligible and in priority need are allocated to one of 5 bands: A+, A, B, C or C-. Band A+ applicants are the highest priority, and are either under-occupiers who are in a position to free up larger homes for other families, or those considered to be in an 'emergency' situation. Those in band A are considered to have 'an urgent or high priority need to move', band B a 'standard' need and C a 'non-urgent' identified housing need. Band C- is allocated to households who meet one of the statutory 'reasonable preference' priorities but have not resided in Harrow continuously for the last 5 years and/or are believed to have deliberately worsened their own circumstances.

At 31 March 2019 there were 2,188 eligible applicants. 2,012 (92%) were 'homeseekers' and 176 (8%) were 'transfer applicants' - those already in social housing but with an identified need to move to a more suitable property. The number of 'homeseekers' at March 2019 was almost three times the number in March 2014 (fig 5.10).

Fig 5.10 Number of Homeseekers, March 2019



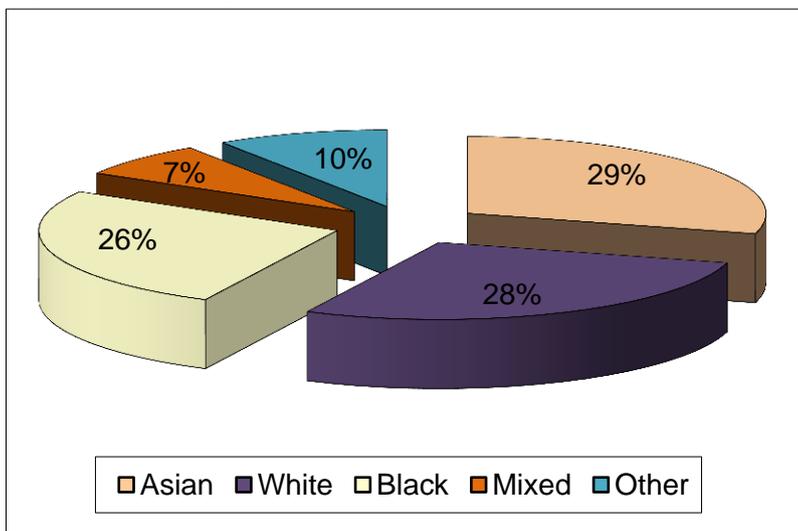
Source: Locata

4% of all applicants were in band A+, 5% in band A, 9% in band B, and 53% in C (6% down year-on-year) and 29% in C- (8% up year-on-year). The proportional change in Band C may be due, at least in part, to the introduction of HRA17.

24% of homeseekers were eligible for 1 bedroom properties, 36% were eligible for 2 bedroom properties, 29% were eligible for 3 bedroom properties and 11% were eligible for 4+ bedroom properties.

81% of homeseekers disclosed their ethnicity and 29% of these are Asian, 28% are White, 26% are Black, 6% are of Mixed ethnicity and 9% are Other (fig 5.11).

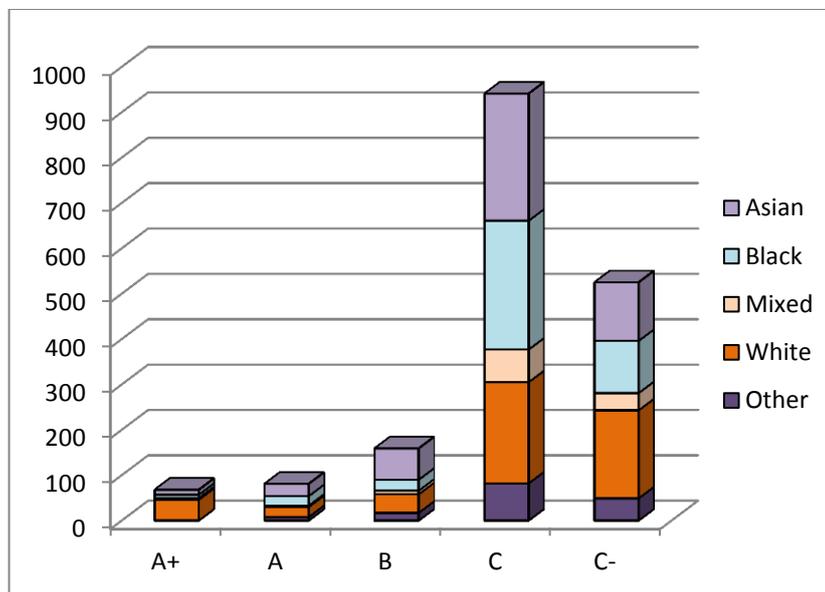
Fig 5.11 Ethnicity of Homeseekers, March 2019



Source: Locata

At 68%, the proportion of White applicants in band A+ appears incongruous in terms of Harrow's current ethnicity, but 62 of the 95 applicants in this band were under-occupiers, and most will be long-term tenants. At 26% across all bands Black applicants are over-represented, and this has also been the case in previous years (fig 5.12).

Fig 5.12 Bands by Known Ethnicity on Housing Register (all applicants), March 2019



Source: Locata

For all applicants, where under-occupation was excluded and pure 'need' was considered, band A+ had 33 applicants in March 2019, and the most common need in this band (excluding the under-occupiers) was 'Medical'. For Band A the most common need was also 'Medical', followed by 'Severe social hardship'. Band B comprised mostly of those needing sheltered accommodation and in Band C over 80% were 'Homeless'. Band C- was almost entirely comprised of 'Initial preference' cases, who may be families that have either not lived continuously in the Borough for 5 years and/or are believed to have deliberately worsened their own circumstances.

In September 2019, 54% of homeseekers were aged under 45, 30% were aged 45-64 and 11% were aged 65+. 64% of these applicants are female and 36% male.

Almost 1,500 (72%) of these homeseekers were recorded as having children. Of this group, 37% had 1 child, 29% had 2 children, 19% had 3 children and 9% had 4 children. The largest number of children recorded in one household was 9 (fig 5.13).

Fig 5.13 Number of Children, September 2019

No. of Children	0	1	2	3	4	5	6	7	9
Count	21	556	434	286	136	37	17	5	1
Per Cent	1.4%	37.2%	29.1%	19.2%	9.1%	2.5%	1.1%	0.3%	0.1%

Source: Locata

Applicants do not always disclose all of their protected characteristics, so some datasets are more complete than others (figs 5.14 to 5.16). For example, only 32% of homeseekers have disclosed their religion and only 29% have disclosed their sexual orientation.

Fig 5.14 Homeseeker Statistics by Protected Characteristics, September 2019

	<b>Number</b>	<b>%</b>
Aged <45	1,121	54.3
Aged 45-64	724	29.6
Aged 65+	218	10.6
Female	1,320	64.0
Male	736	35.7
Gender not disclosed	7	0.3
Maternity	164	7.9
Pregnant	39	1.9
Disability benefit: Yes	75	3.6

Source: Locata

Fig 5.15 Religion of Homeseekers, September 2019

	<b>Number</b>	<b>% of known</b>
Christian	261	40.2
Muslim	217	33.4
No Religion	78	12.0
Hindu	70	10.8
Buddhist	6	0.9
Sikh	5	0.8
Jewish	2	0.3
Other Religions	10	1.5
Known	649	
% known		31.5

Source: Locata

Fig 5.16 Sexual Orientation of Homeseekers, September 2019

	<b>Number</b>	<b>% of known</b>
Bisexual	27	4.5
Gay man	4	0.7
Gay woman/ Lesbian	2	0.3
Heterosexual/ Straight	558	92.5
Other	12	2.0
Known	603	
% known		29.2

Source: Locata

Ex-armed forces applicants are given additional preference, but at September 2019 no homeseeker or transfer applicants were recorded as being 'ex Armed Forces Services'.

## Voids and Lettings

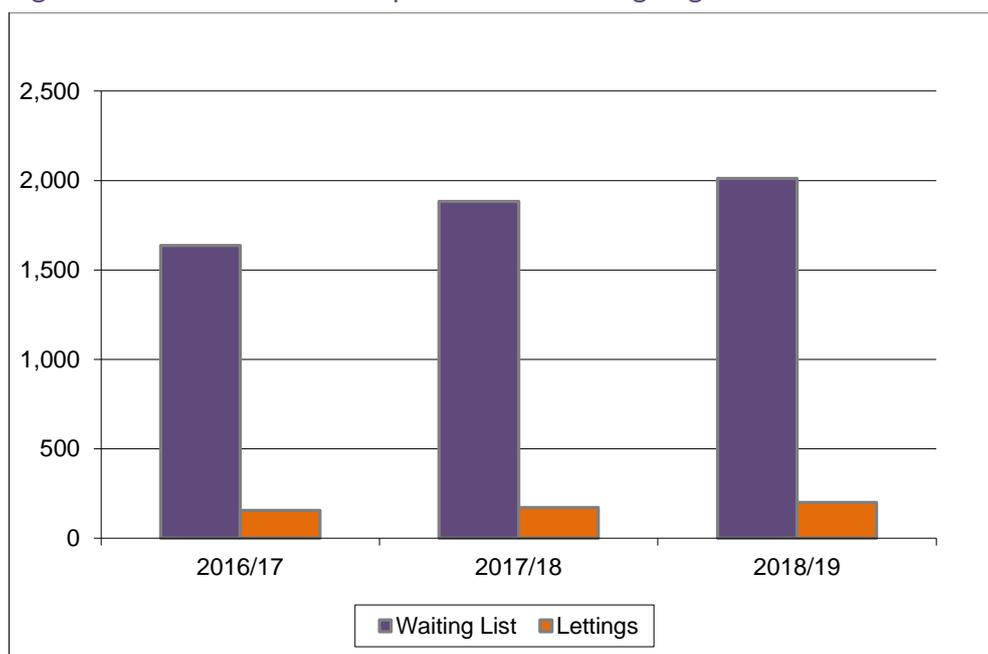
During 2018/19 there were 201 Council properties re-let as permanent stock, with a further 44 let as temporary accommodation. In 2017/18 the figures were 172 and 71 respectively (fig 5.17). This is a tiny proportion in relation to need (fig 5.18)

Fig 5.17 Council Re-Lets

	2017/18	2018/19
Total properties (excl. TA lets)	172	201
0/1 beds	98	127
2+ beds	74	74
General Needs properties	147	159
Sheltered properties	25	42
Major Works properties	75	33
Standard properties with no Major Works	97	168
Average void time (days) for all properties let (termination to let date) excluding time spent undergoing major works	23.7	32.1

Source: Voids Team

Fig 5.18 Council Re-Lets Compared with Housing Register

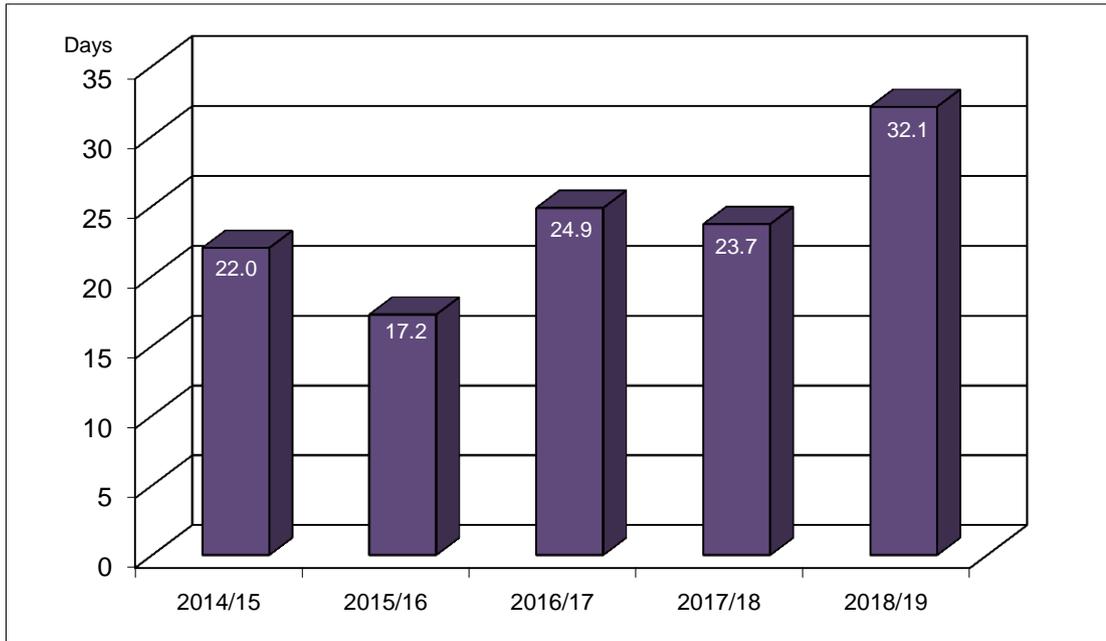


Source: Locata, LAHS

The length of time properties are void affects availability and rental income. This is kept as short as possible through pre-allocating properties and ensuring all lettings are through accompanied viewings. However, it has become more challenging to meet re-let targets for both standard voids and for those needing major works, and indicative 2019/20 void times are significantly longer than in previous years.

The Key Performance Indicator for void to re-let time is the average void time for all LA properties let (termination to let date) excluding time spent undergoing major works. In 2018/19 this was 32.1 days, significantly above its target of 25 days and an increase of over 1/3 from 2017/18 (fig 5.19). This trend has continued during the first half of 2019/20 with a further steep increase to 44.8 days average void time.

Fig 5.19 Average Re-Let Time of LA Properties

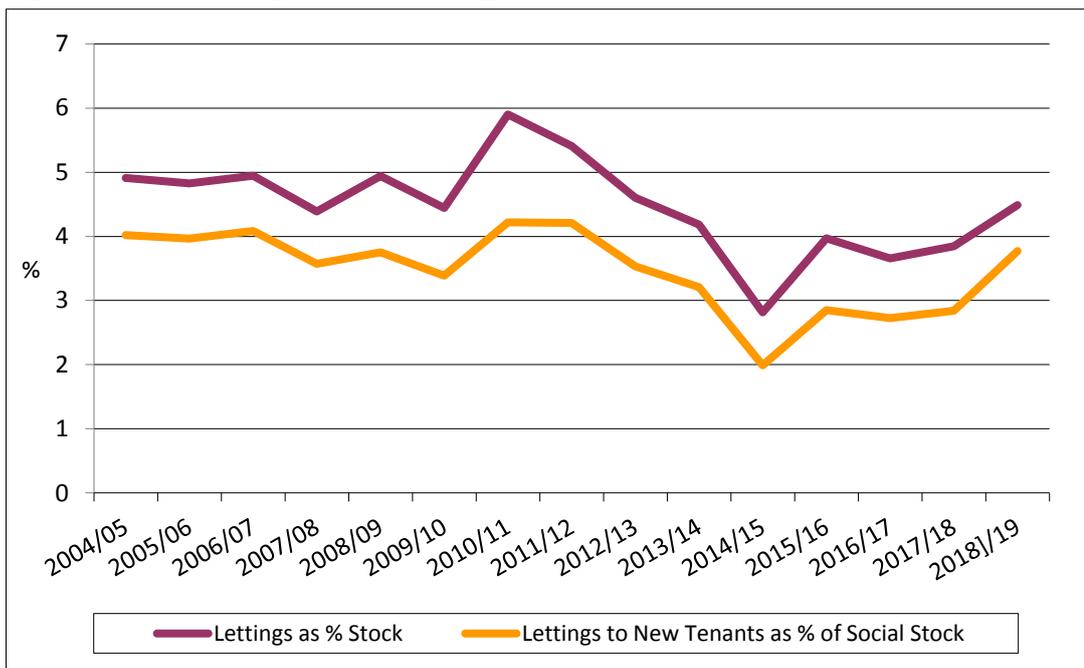


Source: LAHS

In 2018/19, total rent lost from ‘void date to tenancy commencement’ was £137K, and from ‘ready to let date to tenancy commencement’ was £31K. Some of this lost income is due to all tenancies commencing on Mondays.

69% of all social housing lettings to permanent stock were local authority and 42% were Registered Provider (housing association). Lettings to new tenants have stayed at around 80% of all lettings throughout the last ten years (fig 5.20).

Fig 5.20 Total Lettings as a Percentage of All Social Stock



Source: Northgate

## Waiting Times

The average waiting time across all bands increased for almost all property types between 2016/17 and 2018/19 (figs 5.21 to 5.23). The worst affected were those that needed 2 or 3 bedroom properties, and the average waiting time for a 2-bed house increased four-fold to 5 years. The waiting time for sheltered property let in 2018/19 was 13 months, up from 10 in 2016/17.

Fig 5.21 Number of Lets and Waiting Times for Those Housed, 2018/19

2018/19 – All Bands	No. of Lets	Shortest wait	Longest wait	Average wait
Sheltered	59	5 days	4 years	13 months
Studio GN	6	8 weeks	32 months	8 months
1-Bed GN	88	0 days	4 years	10 months
2-Bed Flat / Maisonette	54	4 months	17 years	4 years
2-Bed House	14	7 weeks	20 years	5 years
3-Bed Flat / Maisonette	9	21 months	15 years	10 years
3-Bed House	29	12 weeks	18 years	5 years
4-Bed	5	18 months	10 years	4 years
5-Bed	1	8 years	8 years	8 years

Source: Locata

Studio, 3 bed flat/maisonettes and 4 and 5 bedroom properties have too few lettings to compare year-on-year waiting times.

Only one 5 bedroom property was let in each of the last 2 years, and the waiting times were 8 years and 5 years. This reflects Harrow's extreme shortage of larger properties.

Fig 5.22 Number of Lets and Waiting Times for Those Housed, 2017/18

2017/18 – All Bands	No. of Lets	Shortest wait	Longest wait	Average wait
Sheltered	44	7 weeks	7 years	12 months
Studio GN	8	0 days	21 months	9 months
1-Bed GN	92	11 days	5 years	9 months
2-Bed Flat / Maisonette	48	4 weeks	14 years	3 years
2-Bed House	16	8 weeks	4 years	14 months
3-Bed Flat / Maisonette	3	10 months	12 years	7 years
3-Bed House	45	12 weeks	16 years	3 years
4-Bed	7	6 months	13 years	3 years
5-Bed	1	3 years	3 years	3 years

Source: Locata

The most common lettings in band A were for sheltered accommodation and 1 bed General Needs properties. The waiting times have not significantly changed for these over the last few years, remaining at around 6 months and 5 months respectively.

Most of the band B lettings were for sheltered accommodation and the average waiting time in this band was 18 months, up from 13 months in 2016/17.

Those in band C generally wait far longer, averaging 13 years for a 3 bedroom house in 2018/19, up from 6 years in 2016/17, and those in band C- are highly unlikely to ever be offered a property.

Fig 5.23 Number of Lets and Waiting Times for Those Housed, 2016/17

2016/17 – All Bands	No. of Lets	Shortest wait	Longest wait	Average wait
Sheltered	45	4 weeks	4 years	10 months
Studio GN	5	4 weeks	7 months	3 months
1-Bed GN	62	4 weeks	10 years	11 months
2-Bed Flat / Maisonette	28	10 weeks	14 years	35 months
2-Bed House	15	13 weeks	5 years	15 months
3-Bed Flat / Maisonette	3	8 months	6 years	34 months
3-Bed House	28	12 weeks	14 years	32 months
4-Bed	13	6 months	14 years	4 years
5-Bed	4	28 months	17 years	11 years

Source: Locata

## Letting Refusals

142 permanent stock properties were refused at least once during 2018/19, and the most common reason was that the viewing was not attended. This happened 188 times, with 3, 4 or 5 no-shows for some properties, and non-communication is a major issue. The next most common reason for refusal was 'prefer a larger property' (fig 5.24). Some families living in TA with more bedrooms than they are currently eligible for prefer to stay there, particularly if their children are now adults and considered non-dependents. The lack of lifts within blocks is also a factor, as is local crime. In 83 cases the reason was recorded as 'Other'.

Fig 5.24 Reasons for Refusals

Reason for Refusal	Number of refusals
Prefer larger property	45
Failed to respond to offer	14
Prefer another offer	12
Prefer to be nearer shops/ transport	9
Prefer to be nearer to existing support	7
Prefer different toilet/ bathroom arrangement	6
Consider rent too high	5
Prefer different property type (e.g. house or bungalow to flat, or general needs to sheltered)	5
Changed mind about wishing to move	4
Consider property to be in poor state of repair/ décor/ cleanliness	4
Consider there are too many stairs	4
No reason given	4
Prefer different floor level	4
Property cannot be adapted to meet needs	4
Consider insecure or at risk there	3
No parking	3
Dislike neighbourhood/estate	2
No contact	2
Not allowed to keep pets	1
Only available on Fixed term tenancy	1
Other	83

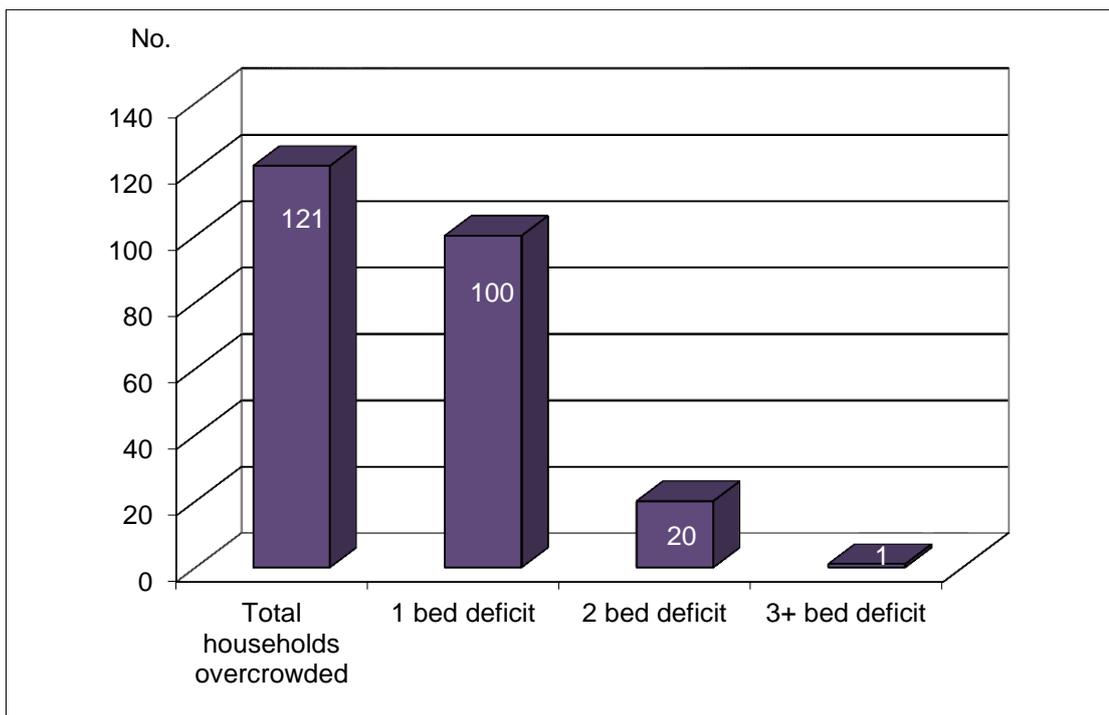
Source: Locata

## Overcrowding

In considering whether a household is overcrowded the Council uses the 'West London Locata Standard' (WLLS) which is very similar to the national 'Bedroom Standard'. This is calculated using the number of household members, their relationship to each other, and the number of bedrooms in the property.

At September 2019, 233 tenants were identified as being overcrowded. 83% (100 households) had one bedroom less than the WLLS but 17% (21 households) were severely overcrowded, defined as having at least two bedrooms less than the WLLS (fig 5.25).

Fig 5.25 Number of Overcrowded Tenants, September 2019



Source: Northgate/Locata

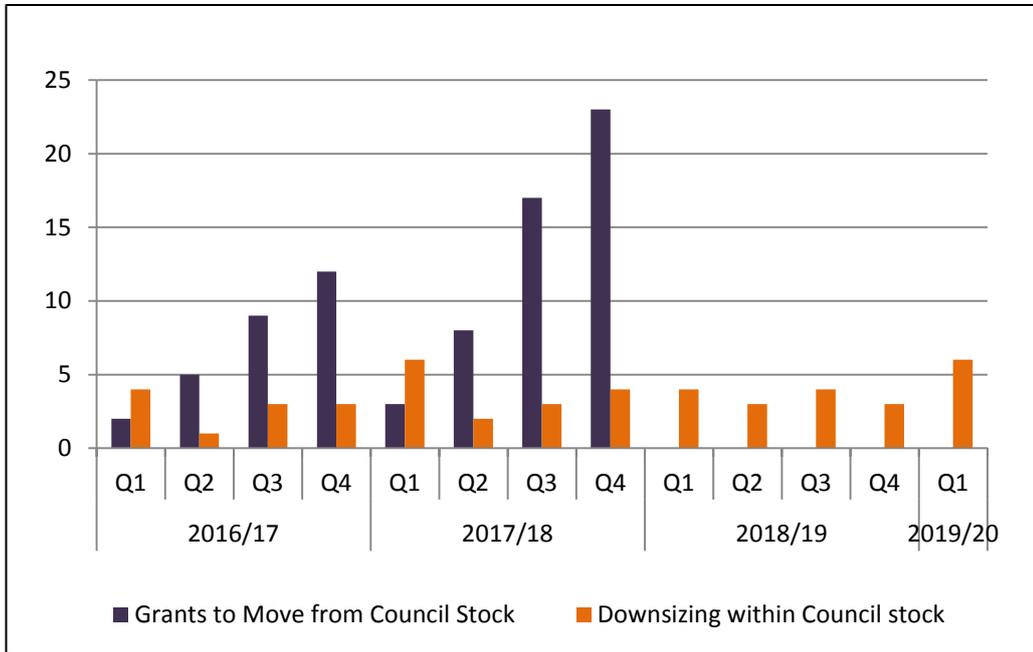
## Under-Occupation and Downsizing

Despite high demand for social housing and many overcrowded households, there are those who have more rooms than they need. Under-occupying tenants are encouraged to downsize, but many are reluctant to move from their familiar surroundings and support networks unless they have a specific reason, such as failing health making it difficult to manage in their current property. The introduction of the spare room subsidy or 'bedroom tax' was intended to incentivise under-occupiers to downsize, but it doesn't apply to the elderly, the most common group of under-occupiers. Some are incentivised by the prospect of cheaper living costs in a smaller property, but most are willing to move only if they are offered a 'desirable' property/location, and it is often difficult to meet their expectations, resulting in a reluctance to bid for the properties that become available. There are also a significant number of refusals of properties at viewings.

Under-occupiers are identified through joint working with other organisations and teams, such as Revenues and Benefits, and invited to Sheltered open days. Those that are willing to transfer to a smaller property are given the highest priority band of A+ on the Housing Register (there were 70 at March 2019), reflecting the need to free-up family-sized properties. They are also offered financial incentives of up to £4,500, £1,500 for each bedroom they 'release'.

46 households were incentivised to downsize within Council stock between April 2016 and June 2019, and a further 67 properties were freed-up through the Grants to Move Scheme that operated between 2013 and 2018 (fig 5.26).

Fig 5.26 Incentives to Move or Downsize



Source: Enabling Team & Housing Needs

### Rents

Social housing is subsidised and rent levels are subject to a national formula. In 2017/18 average LA rents in Harrow were around 36% of those in the private rented sector (PRS), and Registered Provider (RP) rents around 42% (fig 5.27).

Fig 5.27 Average Rents in the Social and Private Sectors, 2017/18



Source: MHCLG & VOA

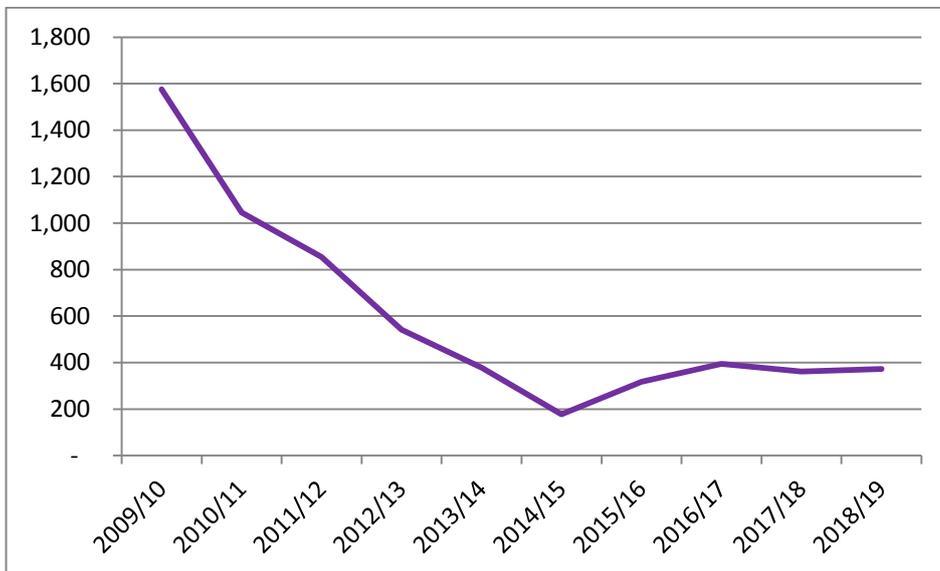
### Decent Homes Standard

The government's Decent Homes Standard (DHS) set the minimum acceptable standards in terms of state of repair, thermal comfort, age and layout of kitchens and bathrooms to meet the legal minimum standard of fitness for housing. Local authorities have a duty to take enforcement action in relation to Category 1 Hazards and discretion to act in relation to Category 2 Hazards.

The Council works hard to identify non-decent homes, improve them via a 'major works' scheme and record the improvements. There were 373 non-decent properties at March 2019, around 7% of stock. This was slightly higher than the previous year which was 361 (fig 5.28). No LA properties were known to have Category 1 Hazards and all met the standard for "reasonably modern amenities and services".

The standard is still referred to by local and central government and housing charities. However, as the most recent version of the Standard still refers to a deadline for improvements of 2010, its status is no longer clear.

Fig 5.28 Council Housing Stock Condition – Non-Decent Properties



Source: LAHS



# HARROW'S HOUSING EVIDENCE BASE SUPPORTED HOUSING

# HARROW'S HOUSING EVIDENCE BASE – SUPPORTED HOUSING



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## HARROW'S HOUSING EVIDENCE BASE - SUPPORTED HOUSING

### Supported Housing Needs

There is a continuing need for supported housing to meet the needs of vulnerable people. This includes extra care housing for older people with support needs, and both floating support and supported accommodation to meet the needs of other groups. People with learning disabilities, with physical disabilities, individuals and families at risk of or recovering from homelessness and rough sleeping, people recovering from drug or alcohol dependency, people with mental ill health, vulnerable young people (such as care leavers and teenage parents) and people fleeing domestic abuse all may need different types of housing related support.

Health, wellbeing and disability can be affected positively or adversely by housing circumstances and the care and support available. In an ageing society it is vital to consider the needs of those who are living longer and with limiting illnesses and disabilities.

There are significant pressures on adult social care service budgets to support the growing needs of older people, those with physical and learning disabilities and people with significant mental health issues.

### Adult Social Care Vision

Adult social care provides support in a variety of ways to those people living in Harrow who have the highest level of care and support needs, for example those with a disability and long-term illness, older people and unpaid carers.

Social care helps people to do everyday things and protects people from harm who are unable to keep themselves safe. The numbers of people who might need care and support in the future is expected to rise significantly.

Adult Social Care Vision's key messages are:

- To pave the way for seamless health and social care integration
- To respond to the continuing rise in demand for health and social care
- To transform the offer of care
- To enhance health, wellbeing and resilience with a preventative approach that embodies the 'wellbeing principle'
- To deliver the right level and type of support at the right time and in the right place to keep people independent for longer
- To manage customer expectation and increase customer satisfaction.

The number of people living with dementia, a learning disability or poor mental health will all increase with an associated rise in demand for health and social care services. It is therefore vital to make the best use of available resources, and a number of workstreams are underway to realise the Adult Social Care vision.

The Care Act 2014 is the most significant change in social care law for 60 years. The legislation sets out how people's care and support needs should be met. The Act's 'wellbeing principle' sets out a local authority's duty to ensure people's wellbeing is at the centre of everything it does.

The Adult Social Care vision prioritises an emphasis on keeping people independent or regaining their independence after injury or illness, as well as recognising the important and positive contributions made by the community (e.g. carers, neighbours, voluntary and community services (VCS), volunteers and faith groups).

It defines community resilience as empowering citizens to maintain their well-being and independence, strengthening support networks within their families and communities; enabling them to be stronger, healthier, and more resilient.

## Floating Support

Floating support services continue to provide some local residents in different housing tenures with help to maintain their housing and independence (fig 6.1) but not on the scale seen in previous years due to changes to funding. The services are now often more focused on shorter periods of more intensive support.

Fig 6.1 Floating Support Services - Client Groups and Providers, October 2019

Provider	Client Group
Hestia Housing and Support	Domestic abuse
EACH Counselling & Support	Generic, substance misuse, offending
Rethink	Mental health, older people
Centrepont Soho	Vulnerable young people, care leavers

Source: Housing Strategy

## Accommodation Based Support

There are a number of supported housing schemes within the Borough (fig 6.2), which provide accommodation for single people for a period of up to two years so that they are able to increase their independent living skills, and are eventually able to live independently with limited support.

Fig 6.2 Accommodation Based Support - Client Groups and Providers, October 2019

Provider	Client Group
Hestia Women's Aid	Domestic violence refuge (women and their children)
SSAFA	Homeless households with support needs and/or Armed Forces connection (women and their children)
Look Ahead	Mental Health
West London YMCA hostel	Young people
West London YMCA supported lodgings	Young people
Harrow Council Shared Lives scheme	Learning disabilities

Source: Housing Strategy

## Sheltered Housing

For older people in the Borough who require low level support there are a range of sheltered housing schemes available (fig 6.3) which offer benefits such as a scheme co-ordinator, communal facilities and a support co-ordinator (based on needs).

Fig 6.3 Sheltered Housing (Rented)

Landlord	Sheltered Scheme Name
Anchor Hanover	Oakmead Court
Anchor Hanover	Weall Court
Genesis Housing Association/Notting Hill Genesis	Cymerline Court
Genesis Housing Association/Notting Hill Genesis	Radnor Court
Harrow Churches Housing Association	Gillian House
Harrow Churches Housing Association	Paxfold
Harrow Churches Housing Association	St Barnabas Court
Harrow Churches Housing Association	Wolstenholme
Harrow Council	Alma Court
Harrow Council	Belmont Lodge
Harrow Council	Boothman House
Harrow Council	Cornell House
Harrow Council	Durrant Court
Harrow Council	Edwin Ware Court
Harrow Council	Goddard Court
Harrow Council	Graham White House
Harrow Council	Grange Court
Harrow Council	Harkett Court
Harrow Council	Harrow Weald Park
Harrow Council	John Lamb Court
Harrow Council	Mead Field
Harrow Council	Sinclair House
Harrow Council	Tapley Court
Harrow Council	Thomas Hewlett House
Harrow Council	William Allen House
Home Prime	Alexander Court
Jewish Community Housing	Gordon Court
Network Homes	Parkfield House
PA Housing	Willow Court
Pinner House Society	Pinner House
Sanctuary Housing	Duncan House

Source: Housing Strategy

## Extra Care Housing

We are working with partners to increase the supply of extra care housing for older people in Harrow, as an alternative to residential care for those who can continue to live independently with some care and support (fig 6.4). Additional schemes are in the pipeline.

Fig 6.4 Extra Care Housing

Landlord	Extra Care Scheme Name
Harrow Churches Housing Association	Ewart House
Harrow Churches Housing Association	Watkins House (under redevelopment)

Source: Housing Strategy

## Home Improvement Agency

Different schemes are available to help people who require adaptations and home improvements to enable them to remain in their own home. Harrow Council supports these residents through promoting and delivering major adaptations (through either Disabled Facilities Grants or the Housing Revenue Account), the handyman scheme and the 'Staying Put' scheme.

## Private Sector Housing Repairs Assistance

The Disabled Facilities Grant (DFG) programme provides funding up to a maximum grant of £30,000 for adaptations to properties in the private sector (fig 6.5). The grants are means tested to assess whether applicants are able to contribute towards the cost of works. Grants for adaptations for disabled children are not subject to means testing.

Fig 6.5 Private Sector Housing Repairs Grants, Loans & Other Assistance

	Private Sector Housing Repairs Assistance	Number of Dwellings Improved	LA Expenditure on Grants	LA Expenditure on Loans & Other Assistance
2015/16	Owner-occupiers	237	£9,800	£15,200
	Private rented	13	£0	£1,000
	Total	250	£9,800	£16,200
2016/17	Owner-occupiers	250	£3,000	£13,900
	Private rented	25	£0	£1,500
	Total	275	£3,000	£15,400
2017/18	Owner-occupiers	259	£115,800	£15,100
	Private rented	23	£0	£1,100
	Total	282	£115,800	£16,200
2018/19	Owner-occupiers	154	£7,700	£10,200
	Private rented	16	£0	£1,000
	Total	170	£7,700	£11,200

Source: Adaptations Team

The number of dwellings improved in the owner occupied tenure includes handyman jobs and discretionary grants. LA expenditure on grants includes only the cost of discretionary grants. LA expenditure on loans & other assistance includes the handyman service.

In 2017/2018 DFG expenditure was high due to two high cost extensions with discretionary grants needed to cover the cost. In 2018/2019 there was a reduced handyman service due to funding issues.

It is expected that future demand for DFGs will increase in line with demographic pressures.

## Affordable Warmth and Climate Change

Housing has a major role to play in meeting the climate change agenda and delivering affordable warmth. These are particularly important priorities in relation to low income households, for whom fuel poverty is an important issue. The Housing Strategy has a positive impact and contributes to the Council's Climate Change Strategy through:

- Referrals to LEAP, a free service that helps people keep warm and reduce their energy bills;
- Delivery of new homes that meet high standards of energy efficiency to reduce CO2 emissions as well as reduce fuel poverty;
- Delivery of larger schemes, such as the Grange Farm regeneration project, that will provide Combined Heat and Power plants (CHP) in accordance with London Plan requirements;
- Provision of other environmental improvements in new housing developments, such as provision of solar thermal hot water systems to meet the target for use of renewable resources and resulting reduction in CO2 emissions;
- Refurbishment grants for empty properties that can include energy efficiency works such as new boilers, heating controls, loft insulation and new windows to reduce CO2 emissions, with a target of 90% of properties to have energy saving improvements on larger externally funded grants;
- Refurbishment of purchased properties in the same way as empty property refurbishments, to reduce CO2 emissions.

## LEAP

Housing Services has been working with LEAP, a free service that helps people in all housing tenures keep warm and reduce their energy bills. A trained Home Energy Advisor visits the home and can install simple energy efficiency measures such as draught proofing, chimney balloons, hot water cylinder jackets, LED lamps, radiator panels, TV standby plugs and shower aerators (fig 6.6).

Fig 6.6 LEAP Referrals and Home Visits in Harrow

Referrals made between 14/11/2018 to 01/10/2019	88
Home visits completed between 30/11/2018 to 18/09/2019	44

Source: LEAP

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