

Scrutiny Standing Panel Agenda



Housing Scrutiny Standing Panel Tuesday, 24th July, 2012

Place: Committee Room 1, Civic Offices, High Street, Epping

Time: 5.30 pm

Democratic Services Officer: Mark Jenkins (The Office of the Chief Executive)
Tel: 01992 564607 Email:
democraticservices@eppingforestdc.gov.uk

Members:

Councillors S Murray (Chairman), A Mitchell MBE (Vice-Chairman), K Avey, K Chana, Ms J Hart, Mrs S Jones, Ms H Kane, L Leonard, Ms G Shiell, Mrs J H Whitehouse and N Wright

SUBSTITUTE NOMINATION DEADLINE:

16:30

1. APOLOGIES FOR ABSENCE

2. SUBSTITUTE MEMBERS (COUNCIL MINUTE 39 - 23.7.02)

(Assistant to the Chief Executive) To report the appointment of any substitute members for the meeting.

3. DECLARATION OF INTERESTS

(Assistant to the Chief Executive). To declare interests in any items on the agenda.

In considering whether to declare a personal or a prejudicial interest under the Code of Conduct, Overview & Scrutiny members are asked pay particular attention to paragraph 11 of the Code in addition to the more familiar requirements.

This requires the declaration of a personal and prejudicial interest in any matter before an OS Committee which relates to a decision of or action by another Committee or Sub Committee of the Council, a Joint Committee or Joint Sub Committee in which the Council is involved and of which the Councillor is also a member.

Paragraph 11 does not refer to Cabinet decisions or attendance at an OS meeting purely for the purpose of answering questions or providing information on such a

matter.

4. TERMS OF REFERENCE / WORK PROGRAMME (Pages 5 - 12)

(Chairman/Lead Officer) The Overview and Scrutiny Committee has agreed the Terms of Reference of this Panel and associated Work Programme. This is attached. The Panel are asked at each meeting to review both documents.

5. REVIEW OF HOMELESSNESS STRATEGY (Pages 13 - 58)

(Director of Housing) To consider the attached report.

6. HOME OPTION CHOICE BASED LETTINGS SCHEME - PROGRESS REPORT (Pages 59 - 64)

(Director of Housing) To consider the attached report.

7. ETHNIC MONITORING (Pages 65 - 68)

(Director of Housing) To consider the attached report.

8. COUNCIL RESPONSE TO CLG CONSULTATION PAPER - "HIGH INCOME SOCIAL TENANTS PAY TO STAY (Pages 69 - 92)

(Director of Housing) To consider the attached report.

9. HOUSING PERFORMANCE INDICATORS (TENANT SELECTED AND KPIS) OUTTURN 2011-12 (Pages 93 - 96)

(Director of Housing) To consider the attached report.

10. WEST ESSEX TENANCY STRATEGY - CONSULTATION DRAFT (Pages 97 - 110)

(Director of Housing) To consider the attached report.

11. REPORTS TO BE MADE TO THE NEXT MEETING OF THE OVERVIEW AND SCRUTINY COMMITTEE

To consider which reports are ready to be submitted to the Overview and Scrutiny Committee at its next meeting.

12. FUTURE MEETINGS

There will be an extra-ordinary Panel meeting on Tuesday 7 August 2012 at 5.30p.m. in the Committee Rooms, and then on the following dates:

- (1) Tuesday 23 October 2012 at 5.30p.m.;
- (2) Tuesday 29 January 2013 at 5.30p.m.; and
- (3) Tuesday 19 March at 5.30p.m.

TERMS OF REFERENCE - STANDING PANEL

Title: Housing

Status: Standing Panel

Terms of Reference:

(1) To undertake reviews of public and private sector housing policies on behalf of the Overview and Scrutiny Committee, Housing Portfolio Holder or Head of Housing Services and to make any recommendations arising from such reviews to the Housing Portfolio Holder or Cabinet as appropriate.

(2) To undertake specific projects related to public and private sector housing issues, as directed by the Overview and Scrutiny Committee, and to make any recommendations arising from such reviews to the Housing Portfolio Holder or Cabinet as appropriate.

(3) To consider and provide comments to the Housing Portfolio Holder on the following matters, prior to consideration by the Cabinet:

- (i) Draft Housing Strategy (to be adopted by full Council in accordance with the Council's Constitution)
- (ii) Draft Private Sector Housing Strategy
- (iii) Draft Private Sector Housing Grants Policy
- (iv) Annual Review of the Housing Allocations Scheme

(4) To consider and provide comments to the Housing Portfolio Holder on draft versions of the following documents:

- (i) Housing Revenue Account (HRA) Business Plan
- (ii) Local Supporting People Strategy
- (iii) Housing Service Strategies

(5) To undertake the Annual Ethnic Monitoring Review of Housing Applicants and Housing Allocations, in accordance with the Code of Practice in Rented Housing.

(6) To monitor progress with the actions plans contained in the following documents, on a six-monthly basis:

- (i) Housing Strategy
- (ii) Local Supporting People Strategy
- (iii) Private Sector Housing Strategy
- (iv) Housing Services Development Plan

(7) To consider the Housing Portfolio Holder's draft response to any consultation papers relating to public or private sector housing that the Housing Portfolio Holder considers warrants a response from the Council.

(8) In relation to Traveller issues to consider and monitor:

- (a) the position regarding tolerated sites and;
- (b) the management of travellers who enter onto land within the district with a view to unauthorised encampments, with particular reference to the legal remedies available, interactions with other agencies such as Essex Police and Essex County

Council and the provision of emergency and/or transit sites within the district;

(c) Government's guidance on the needs of travellers in the context of the Council's review of its District Local Plan and the Essex Housing Needs Assessment;

(d) the results of the Commission for Racial Equality's study on traveller issues in which this Council participated, once published;

(9) To report to the Overview and Scrutiny Committee, the Council and the Cabinet with recommendations on matters allocated to the Panel as appropriate.

Chairman: Cllr Stephen Murray

Housing Scrutiny Standing Panel – 2012/2013

Item	Report Deadline / Priority	Scheduled Date	Progress / Comments	Programme of Future Meetings
Standard (Periodic) Items				28th June 2012 (Special) 24 th July 2012 7 th August 2012 23 rd October 2012 29 th January 2013 19 th March 2013
(1) Annual Ethnic Monitoring Review of Housing Applicants <i>(Recommendations to Housing Portfolio Holder)</i>	Medium	July 2012	On agenda this (July) Meeting	
(2) Annual Report on the HomeOption Choice Based Lettings Scheme	Low	July 2012	On agenda this (July) Meeting	
(3) Housing Performance Indicators - 2011/12 Out-turn <i>(Tenant-Selected & KPIs)</i>	Low	July 2012	On agenda this (July) Meeting	
(4) Housing Strategy Action Plan 2012/13 <i>(Recommendations to Cabinet)</i>	High	August 2012		
(5) Performance against Housing Service Standards and Review <i>(Recommendations to Housing Portfolio Holder)</i>	Medium	August 2012		
(6) 12-Month Progress Report on Housing Strategy Action Plan 2011/12	Low	August 2012		
(7) Six-Month Review of the HRA Financial Plan	Medium	October 2012		

(8) Six-monthly Progress Report on Housing Business Plan Action Plan	Low	October 2012	
(9) Annual Review of the Housing Allocations Scheme <i>(Recommendations to Cabinet)</i>	High	January 2013	
(10) Briefing on the proposed Council rent increase for 2013/14	Low	January 2013	
(11) Six-monthly Progress report on Housing Strategy Action Plan 2012/13	Low	January 2013	
(12) HRA Business Plan 2013/14 <i>(Recommendations to Housing Portfolio Holder)</i>	High	March 2013	
(13) Six-Month Review of the HRA Financial Plan	Medium	March 2013	
(14) 12-monthly Progress report on Housing Business Plan Action Plan	Low	March 2013	
Special (Planned) Items – Including Updated Housing Service Strategies			
(15) Issues relating to the implementation of new licences for park home sites <i>(Recommendations to Cabinet)</i>	High	June 2012	Completed – June 2012

(16) Homelessness Strategy – Revision and update <i>(Recommendations to Housing Portfolio Holder)</i>	High	July 2012	On agenda this (July) Meeting
(17) West Essex Tenancy Strategy – Consultation Draft	High	July 2012	On agenda this (July) Meeting
(18) Response to CLG “Pay to Stay Consultation Paper”	Medium	July 2102	On agenda this (July) Meeting
(19) Presentation by Mears – Repairs Management Contract – One year on	Medium	August 2012	
(20) Results of the Tenant Satisfaction Survey 2012	Medium	August 2012	
(21) Adoption of EFDC’s Tenancy Policy <i>(Recommendations to Cabinet)</i>	High	October 2012	
(22) Housing Service Strategy on Home Ownership (Review and update) <i>(Recommendations to Housing Portfolio Holder)</i>	Medium	October 2012	
(23) Housing Service Strategy on Rent Administration (Review and update) <i>(Recommendations to Housing Portfolio Holder)</i>	Medium	October 2012	

(24) Housing Service Strategy on Repairs and Maintenance (New) <i>(Recommendations to Housing Portfolio Holder)</i>	Medium	October 2012		
(25) Housing Service Strategy on Energy Efficiency (Review and update) <i>(Recommendations to Housing Portfolio Holder)</i>	Medium	October 2012		
(26) Housing Service Strategy on Under-Occupation (Review and update) <i>(Recommendations to Housing Portfolio Holder)</i>	Medium	October 2012		
(27) Housing Service Strategy on Equality and Diversity (Review and update) <i>(Recommendations to Housing Portfolio Holder)</i>	Medium	October 2012		
(28) Proposed housing service improvements and service enhancements, as a result of the additional resources available from HRA self financing <i>(Recommendations to Cabinet)</i>	High	January 2013		
(29) Housing Service Strategy on Housing Advice (Review and update) <i>(Recommendations to Housing Portfolio Holder)</i>	Medium	January 2013		

(30) Housing Service Strategy on Allocations (Review and update) <i>(Recommendations to Housing Portfolio Holder)</i>	Medium	January 2013		
(31) Housing Service Strategy on Tenant Participation (Review and update) <i>(Recommendations to Housing Portfolio Holder)</i>	Medium	March 2013		
(32) Housing Service Strategy on Harassment (Review and update) <i>(Recommendations to Housing Portfolio Holder)</i>	Medium	March 2013		
Items added after the original Work Programme was agreed				
Items for Future Years				
Progress Report on Private Sector Housing Strategy	Low	July 2013		
Social Housing Fraud Scheme – Progress Report	Low	July 2013		

Review of new posts under Housing Improvements and Enhancements Budget: (a) Senior Housing Officer (Social Housing Fraud) (b) Housing Underoccupation Officer (c) Handyperson – Sheltered Housing Schemes	Low	July 2013		
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Report to Housing Scrutiny Panel

Date of meeting: 24 July 2012

Portfolio: Housing – Councillor D. Stallan

Subject: Review of the Homelessness Strategy

**Officer contact for further information:
Roger Wilson extension 4419**

**Committee Secretary:
Mark Jenkins extension 4607**



Recommendations/Decisions Required:

The Housing Scrutiny Panel is asked to consider the draft Homelessness Strategy and report any comments to the Housing Portfolio Holder.

Background Report:

- 1.1 Under the Homelessness Act 2002, Local Authorities have a duty to review and publish their Homelessness Strategy on at least a 5 yearly basis. As this area of work regularly changes it was agreed that the Council's Strategy would be reviewed every three years. The Strategy links with the Council's Housing Strategy, Allocations Scheme, the Housing Services Strategy on Housing Advice and Allocations, and the Council Plan. The Strategy sets out achievements since 2009 and incorporates the needs and demands on the service and actions that need to be undertaken over the coming three years.
- 1.2 The Housing Scrutiny Panel is asked to consider the Draft Homelessness Strategy, which is included in the Panel's Work Programme, and is attached as an appendix, and report any comments to the Housing Portfolio Holder.

Consultation

- 1.3 Following the meeting, the Draft Homelessness Strategy will be sent to all Stakeholders, Town and Parish Councils and the CLG seeking their comments.

Resource implications:

Budget provision: None

Personnel: None

Land: None

Community Plan/BVPP reference: N/A

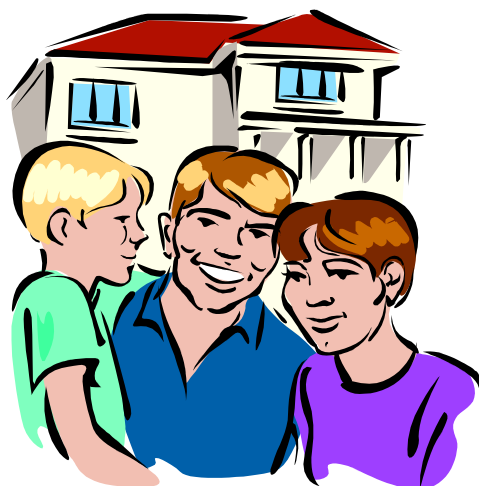
Relevant statutory powers: Housing Act 1996, as amended and the Localism Act 2011

Background papers: Customer Impact Assessment, Housing Service Strategies on Housing Advice & Allocations & Homelessness. Current Homelessness Strategy

Environmental/Human Rights Act/Crime and Disorder Act Implications: N/A

Key Decision reference: (if required) N/A

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Homelessness Strategy

2012/13 to 2014/15



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Executive Summary

1. Foreword

- 1.1 Under section 1(3), (4) of the Homelessness Act 2002, local authorities have a duty to review and publish their Homelessness Strategy on at least a 5 yearly basis. As this area of work regularly changes it was agreed that the Council's Strategy would be reviewed every three years. The Strategy links with the Council's Housing Strategy, Allocations Scheme, the Housing Services Strategy on Housing Advice and Allocations, and the Corporate Plan. The Strategy sets out achievements since 2008/09 and incorporates the needs and demands on the service and actions that need to be undertaken over the coming three years.
- 1.2 The homelessness function is provided through the Housing Directorate's Housing Options Section. A staffing structure chart is shown at Appendix 2.
- 1.3 The Council's Housing Directorate continues to be accredited for the ISO 9001:2008 quality assurance scheme by Lloyds Register Quality Assurance. The Housing Directorate was also successful in retaining the Customer Service Excellence Award (formerly known as Charter Mark) for the third time in August 2010, for a further 3 years.

2. Background

- 2.1 The last three years have seen a high demand upon the Homelessness Prevention Team. The Service has been very successful in preventing homelessness in many cases. This has been possible due the Team maximising the use of the range of tools set out, in particular, in the Homeless Prevention Section of the Strategy.
- 2.2 At the time of this Strategy being produced the Country is in recession. This has led to an increase in demand on the Homelessness Prevention Service where people are seeking resolutions to their housing difficulties. This is especially prevalent amongst owner occupiers who are having problems maintaining mortgage repayments.

3. Housing Advice

- 3.1 The Council has a rolling Service Level Agreement with the Citizens Advice Bureau (CAB) in the District to provide a range of advice and support those faced with housing difficulties. In addition, a signed protocol has been developed in conjunction with the National Homeless Advice Service.
- 3.2 The Housing Options Section within the Housing Directorate provides advice and information leaflets. General information on Housing Services can be obtained through the Council's website, from which housing application forms can be down-loaded. Applicants can also seek information on accessing accommodation in the private rented sector and advice on dealing with domestic violence issues etc.

4. Homelessness Prevention

- 4.1 The continuation of the Homeless Prevention Service has been significant during the last 3 years. The objective of reducing the number of households making a homeless application by providing effective prevention measures continues to be met. However, the Council is committed to ensuring that if homelessness cannot be prevented for any reason, it will accept a homeless application in order to decide what statutory duty may be owed to the household.

5. Recession Planning

- 5.1 Due to the current economic climate, the Council has put in place a number of initiatives to assist those who are experiencing housing difficulties and may be faced with losing their homes which are as follows:

Epping Forest Housing Aid Scheme (EFHAS)

- 5.2 The Epping Forest Housing Aid Scheme (EFHAS) is a registered charity which operates on a voluntary basis to provide damage deposit guarantees (equivalent to one month's rent) to landlords on behalf of applicants to assist them in securing accommodation in the private rented sector.

Rental Loan Scheme

- 5.3 The Rental Loan Scheme was set up in order to assist applicants in securing accommodation in the private rented sector. Under the scheme, a loan is granted to meet the cost of the first month's rental in advance, repayable interest free over a period of 24 months. An applicant can potentially benefit from both a rental loan and a rent deposit guarantee.

Parental Exclusions

- 5.4 Young people can sometimes have volatile relationships with their parents and can be at risk of exclusion from their home. Since 2004, "Relate" have undertaken mediation in a number of cases to attempt to reconcile young people with their parents in order for them to remain at home. The Council also works with Essex County Council's Homelessness Response Team who also mediates with families.

Sanctuary Scheme

- 5.5 The Council set up a Sanctuary Scheme for victims of domestic violence or hate crime in April 2007. This scheme is an effective tool in the prevention of homelessness for high risk cases of domestic violence or hate crime. The intention of the scheme is to provide a safe room within the victim's home. The Housing Options Section works in partnership with Safer Communities, Essex Police, Essex Fire and Rescue and Safer Places (formerly known as Harlow Women's Aid). All referrals to the scheme are made through the Homeless Prevention Service. The Scheme is funded jointly by the Safer Communities Team and the Housing Directorate and is available to people on a tenure neutral basis, e.g. tenants, owner occupiers, private rented sector etc.

Single Accommodation For Epping Forest (SAFE)

- 5.6 SAFE is part of NACRO Community Enterprises, a registered housing association and charity, and offers temporary accommodation with support to single homeless people. It works in partnership with the Council, Epping Assessment and Child Protection Team and Essex Probation Service (EPS).
- 5.7 It provides 37 bed spaces across the District in a mix of shared houses and individual units. Around 80% of all referrals are through the Housing Directorate, Learning and Social Care, and Essex Probation Services. In addition, some self-referrals are made. Applicants must be single and homeless or at risk of homelessness. The target age group is 18 to 25 years, although others are accepted depending on circumstances.

Mortgage Rescue

5.8 In January 2009, the CLG announced the introduction of the Mortgage Rescue Scheme. The intention of the scheme is to assist the most vulnerable households who are at risk through re-possession. Between 1 July 2009 and 1 July 2011, the Council, in partnership with the lead provider for Essex, Moat Homes Limited, assisted a total of 7 households to keep their homes through Mortgage Rescue. Since July 2011, no further households have been assisted because of restrictions that have been placed upon the scheme. These include the price cap on the value of a property being reduced to less than £200,000, and only freehold properties being rescued (i.e. houses not flats). As the values of most, if not all eligible properties in the District are well above the cap, the use of Mortgage Rescue is now therefore limited.

6. The Role of Essex County Council's Social Care

- 6.1 The majority of children's services are now provided on a 'quadrant basis' (Essex has been split into four geographical areas with each area being a quadrant) and children in the Epping Forest District receive services from the 'West Essex Quadrant'.
- 6.2 The Leaving & After Care Team takes casework responsibility for children up to the age of 15 years and six months. The team provides support whilst the young people are in care. The team also provides aftercare support according to the specific provisions of the Children Act 1989 as amended by the Children Leaving Care Act 2000.
- 6.3 The Council's Homelessness Prevention Team are notified by the Leaving and After Care Team prior to a young person leaving care in order that their housing needs can be assessed. In general, the Council will arrange for the SAFE Scheme through NACRO (a housing association providing specialist housing and support for young people) to accommodate young people leaving care to give them extra preparation for independent living. The Council then re-houses the young person when they move on from SAFE into Council accommodation often with Floating Support.
- 6.4 The Homeless Response Team is a small, centrally based team (located at County Hall, Chelmsford) which seeks to engage with 16 & 17 year olds on the verge of parental eviction and mediates with families to avoid homelessness and the necessity of providing accommodation under Section 20 of the Children Act 1989. The team works in partnership with the Council's Homelessness Prevention Team.
- 6.5 The Assessment and Intervention Team respond to the immediate needs of children and families referred to the Children's and Families Service where an assessment of that need is required and especially in relation to "Safeguarding".
- 6.6 The Family Support and Protection Team responds in the longer term for those children subject to Child Protection Plans, and Child in Need plans.
- 6.7 The Learning Disability and Physical Impairment Team refer people requiring housing and support to schemes in Ongar called Barnes Court, and Tolpuddle House which are owned and managed by East Thames Housing Association.
- 6.8 The Community Assessment Team for Older People assist people aged over 65 years. Initial referrals are received first by a central Essex team (Social Care Direct) and then passed where necessary to Goodman House, Harlow.
- 6.9 The Council has a Corporate Safeguarding Group. Key staff have received training on Safeguarding vulnerable adults. The Council has a Safeguarding Strategy and a reporting form and has an e-learning package available to all staff.

7. Services for People Involved in Drug and Alcohol Abuse

- 7.1 The Housing Options Section deals mainly with referrals from the Community Drug and Alcohol Team (CDAT). However, there is also occasional contact from the Alcohol and Drugs Advisory Service (ADAS) and the Essex Young Peoples' Drug and Alcohol Service (EYPDAS). All ADAS clients are assessed with complex cases being referred to CDAT. Clients with alcohol problems far outnumber those with drug problems.
- 7.2 CDAT offers outreach services in Loughton and Waltham Abbey. Clients are referred through a number of sources, including hospitals, ADAS, GPs, family members and self-referrals. The minimum age for clients is 16 years with no upper age limit.
- 7.3 Homelessness is commonly a problem for CDAT clients. Since the Council has closer links with CDAT, a local protocol has been agreed to enhance good partnership working.
- 7.4 EYPDAS is based in Chelmsford but offers services across Essex. It is one of a number of the Children's Society's projects but receives funding from diverse sources. It works with clients until they reach the age of 19 years but also offers support to families, carers and professionals.
- 7.5 This family support helps young people remain in their own homes, but when necessary they are referred to the emergency night shelters in Colchester or Chelmsford.
- 7.6 The work of EYPDAS in the Epping Forest District has included a number of information sessions, but it has fewer clients in this locality than others.

8. Applications, Decisions, Notifications and Reviews

- 8.1 The process of assessing homelessness applications is complex and governed by the provisions of Part VI1 of the Housing Act 1996 (as amended by the Homelessness Act 2002). Careful attention is given to the Code of Guidance issued by the CLG and homelessness case law. Legislation on immigration is also observed.
- 8.2 All homeless applications are processed by the Homelessness Assessment Officer based within the Housing Options Section. In processing these applications the Code of Guidance is complied with.
- 8.3 Homelessness enquiries may involve contact with previous landlords (both public and private), mortgage lenders, solicitors, environmental health officers, land registry, social workers, medical practitioners, occupational therapists, hospital workers, victim support groups, police, neighbours, relatives, and the UK Border Agency.
- 8.4 The Council adopts a 'firm but fair' approach to homelessness. The intention is only to secure accommodation when statutorily required to do so. However, applicants have a legal right of review on adverse homelessness decisions. Such reviews are conducted, depending on the nature of the case, by an officer more senior than the one who made the original decision or the Council's Housing Appeals and Reviews Panel, which comprises 5 District Councillors. If the applicant is dissatisfied with the decision made at the statutory review, they are advised they have the right to pursue an appeal, on a point of law, through the County Court.

9. Interim and Temporary Accommodation

- 9.1 The Council uses a variety of interim and temporary accommodation, including bed and breakfast accommodation for households without children, self-contained flats at Hemnal House, Epping, a Women's Refuge move on scheme and rooms at the Norway House Hostel, North Weald where housing-related support is provided.

10. Epping Forest District Council's Allocations Scheme

- 10.1 The Council operates a HomeOption choice based lettings scheme and has its own Housing Register in accordance with the provisions of the Housing Allocations Scheme, which is reviewed periodically by the Cabinet.
- 10.2 The Scheme includes vacancies in the Council's own housing stock and housing association properties for which the Council has nomination rights. Applicants are able to "express an interest" in properties advertised on the website and also through a fortnightly Property List.
- 10.3 The degree of priority awarded to applicants on the Housing Register is assessed by reference to a banding system. The banding system is currently devised to afford homeless people, those at risk of homelessness and those who have been homeless, a reasonable degree of preference for long-term accommodation.

11. Consultation

- 11.1 A consultation exercise on this Homelessness Strategy has been undertaken with all partner agencies, the CLG, Town and Parish Councils, the Tenants and Leaseholder's Federation and the Council's Housing Scrutiny Panel. The Strategy was approved by the Housing Portfolio Holder in August 2012.

12. Action Plans

- 12.1 The Action Plan sets out the actions required to implement this Strategy, identifying officers responsible for progressing those actions and setting targets for completion.

Foreword

1. Introduction

- 1.1 Under section 1(3), (4) of the Homelessness Act 2002, local authorities have a duty to review and publish their Homelessness Strategy on at least a 5 yearly basis. As this area of work regularly changes it was agreed that the Council's Strategy would be reviewed every three years. The Strategy links with the Council's Housing Strategy, Allocations Scheme, the Housing Services Strategy on Housing Advice and Allocations, and the Corporate Plan. The Strategy sets out achievements since 2008/2009 and incorporates the needs and demands on the service and actions that need to be undertaken over the coming three years.
- 1.2 The homelessness function is provided through the Housing Directorate's Housing Options Section. A staffing structure chart is shown at Appendix 2.
- 1.3 This Council's Housing Directorate continues to be accredited for the ISO 9001:2008 quality assurance scheme by Lloyds Register Quality Assurance. The Housing Directorate was also successful in retaining the Customer Service Excellence Award (formerly known as Charter Mark) for the third time in August 2010 for a further 3 years.

2. Background to the Council's Homelessness Service

- 2.1 The homelessness service is provided by the Housing Directorate's Housing Options Section. The Council works within the provisions of the Equality Act 2010 and follows the guidance set out in the Equality and Human Rights Commission's Code of Practice in Rented Housing and the requirements of the Council's Equality Impact Assessments.
- 2.2 As at June 2012, the Council has 6,219 homeseekers on its Housing Register, and has a housing stock of 6,538 properties.
- 2.3 The last three years have seen only 259 new affordable homes provided within the Epping Forest District, an average of just 86 new affordable homes per annum. At the time of writing (June 2012), only 6 developments have planning permission to provide 183 new affordable homes over the next 3 years (2012/13 – 2014/15), an average of just 61 per annum. The reason for the current lack of development sites within the District is due to developers' reluctance to develop in the current economic climate. However, the Council's own new House Building Programme should provide around 20 new affordable homes per annum, with the first developments expected to start on site in 2014.

3. Localism Act 2011

- 3.1 Under the Localism Act, although a Government Commencement Order is yet to be issued, it is proposed that councils will be given powers to discharge their Homelessness Duty by offering suitable accommodation in the private rented sector with or without the consent of the applicant. The accommodation must be provided for a minimum term of 12 months in order to end the Council's duty. If the accommodation is lost by the applicant within a period of 2 years of the offer then they can re-apply, regardless of priority need and if appropriate referred back to the host authority. When the Government Commencement Order is received, the Council will be considering whether it wishes to use these powers and agree a policy on when private sector offers will be made.

4. Welfare Reforms

4.1 The Welfare Reform Act 2012 provides for the introduction of a “universal credit” to replace a range of existing means-tested benefits and could have a significant impact upon homelessness. Between October 2013 and April 2014, 500,000 new claimants will receive universal credit. The Council has taken a pro-active approach in commissioning the Chartered Institute of Housing to undertake a major study into the implications of the Welfare Reforms on the Council, its tenants, private tenants and homelessness. The key findings of the study (which is still in draft form) and the matters recommended to be included in a future Strategy and Action Plan relating to homelessness are as follows:

- Explore the use of existing funding for prevention of homelessness and the options for investing more in prevention and interventions bearing in mind the increased demand for, and cost of, temporary accommodation.
- Corporately set up a Welfare Reform Response Group including officers from across the Council to focus on sharing information, tracking and reporting the impact of the changes and to put in place focused measurable initiatives around advice, support, communications and financial inclusion activities.
- Review staffing resources against the Welfare Reform Strategy and action plan ensuring they are focused on delivering the actions that will have most impact and making changes where they are not.
- Scope out the availability of debt advice and counselling services including under the SLA with CAB, setting out how many clients are dealt with, client categories, nature of advice including level of priority and non priority debts dealt with and trends in type of issue and support needed. All this to be set against the type and number of household most likely to need assistance as a result of welfare reform.
- Anticipating the increased need for financial inclusion services – explore through the corporate Welfare Reform Response Group. Looking at access to and the promotion of affordable credit, access to bank accounts, co-ordinated work to deter use of “loan sharks”, take up of welfare benefits including Council Tax benefit
- Put in place a communication plan linked to corporate communications that sets out the who, when and how around how on the impact of welfare reform and the availability of support, communicating with staff, tenants, residents, landlords and partner agencies.
- Undertake pro-active engagement with the Citizens Advice Bureau, to ensure that their advisors are fully aware of the welfare reforms, the implications and who to contact within the Council to discuss clients’ queries
- Consider whether the annual grant to the CAB should be increased to recognise and reflect the additional work that the CAB will be undertaking for the benefit of Epping Forest residents.
- Consider and adopt a clear policy on the use of Discretionary Housing Payments, to ensure that the budget (funded by DWP) is maximised and is targeted at preventing homelessness
- When the Council reviews its Housing Allocations Scheme in the light of the Localism Act and the CLG’s new guidance on allocations, ensure that the Housing Allocations Scheme is aligned with the welfare reforms, in terms of the size of properties offered to applicants of different household sizes and children’s ages and how overcrowding (for which increased priority is given) is assessed with regard to household size and children’s ages

- Encourage tenants to set up bank accounts to receive Universal Credit payments
- Ensure appropriate housing and housing benefit staff are briefed on the main elements of the welfare reforms, and trained on how to provide advice to customers
- Consider the benefits and associated costs of appointing permanent or temporary welfare advice staff (perhaps from existing HB staff) to provide advice to the Council's tenants and private tenants on welfare reforms as the DWP are unlikely to provide such a service locally.
- Publicise the introduction of the welfare reforms and the implications and possible solutions for different categories of tenants in the Council's "Housing News" a periodic newsletter for tenants

Statistical analysis of homelessness

1. Incidence of Homelessness

- 1.1 Local housing authorities are required by Government to complete quarterly Housing Activity Returns, which include statistical information on homelessness. These include the information given in the table below on homelessness decisions made by the Council in the last four years.

Homelessness Information	2008/09	2009/10	2010/11	2011/12
Number of applicants to whom a full duty is owed.	71	48	58	60
Number of applicants found to be intentionally homeless.	10	11	4	5
Number of applicants found not to be in priority need.	15	12	12	13
Number of applicants found to be not homeless.	24	27	20	22
Number of applicants found to be ineligible for assistance.	0	0	0	1
Total number of homelessness applications	120	98	94	101

- 1.2 As can be seen, the number of homelessness applications increased slightly last year and is expected to increase in future years due to the economic climate, the increased cost of private rented and owner occupied accommodation and the Government's Welfare Reforms. However, due to the success of the Homelessness Prevention Service it should be noted that the number of homelessness applications has reduced from 477 in 2005/2006 to 101 in 2011/2012 a reduction of 79% which is considered to be a major achievement. Statistical information on this area of work is set out under the Homelessness Prevention section of the Strategy.

- 1.3 Information on the ethnicity of all Housing Register applicants, which is reported to the Council's Housing Scrutiny Panel, is set out in the table below. The ethnicity of homeless applicants is not currently monitored, although this is being explored for the future:

Ethnicity	2008/09 (%)	2009/10 (%)	2010/11 (%)	2011/12 (%)
White British/Irish	78.0	79.0	77.3	74.95
Bangladeshi/Pakistani/Indian	0.8	0.7	0.8	0.8
African/Caribbean	3.0	3.2	3.3	3.72
Mixed Ethnicity	1.2	1.2	1.2	1.29
Other	5.0	4.4	5.0	6.06
Not stated	12.0	11.5	12.4	13.18

- 1.4 The 2001 Census showed that ethnic minorities made up just under 5% of the population of the District at that time. Following the National Census 2011, updated figures on the ethnicity of the District will be available in 2013. It is considered that the statistics do not raise any concerns about any particular group being discriminated against. The Council undertakes Customer Equality Impact Assessments across all of its front-line services.
- 1.5 Although Gypsies and Travellers are not identified as a group on Housing Activity Returns they do face particularly problems when homeless due to their cultural aversion to 'bricks and mortar'. A number have purchased land within the District on which they have sited caravans and mobile homes for residential purposes without planning permission. Some have exhausted appeals processes, been evicted, and sought homelessness assistance, others have been tolerated and some have been granted planning permission. There are currently 18 Gypsy and Traveller sites across the District totalling 95 pitches. Eleven of the sites include 75 pitches in Roydon and Nazeing. One site at Stanford Rivers is in the public sector and is owned Essex County Council. The remainder are on privately owned land. National policy requires that there is a significant increase in the number of gypsy and traveller sites in appropriate locations, with a focus on increased provision over the next 3-5 years.

2. Analysis of Priority Need

- 2.1 Priority need is determined by statute and prescribes categories of persons for whom local housing authorities must secure accommodation if they are homeless, provided they have not become intentionally homeless.
- 2.2 Set out in the table below is an analysis of applicants found to be in priority need, unintentionally homeless and owed a full homelessness duty, taken from the Council's Housing Activity returns. These form part of the Government's PI (E) return (statistical information which is completed by all authorities) confirming those households the Council has accepted as being in a priority need and the reasons:

Priority Need Category	2008/09	2009/10	2010/11	2011/12
Applicant homeless because of fire, flood, storm or similar disaster.	0	0	0	0
Applicants with dependent children (including violent breakdown of relationship (partner))	50	24	37	47
Applicants in priority need because of pregnancy but no other children.	1	7	3	4
Applicants aged 16/17 years.	6	2	2	1
Applicants formerly in care and aged 18-20 years.	1	0	0	1
Applicants vulnerable due to old age.	0	2	1	1
Applicants vulnerable because of physical disability.	3	1	4	0
Applicants vulnerable because of mental illness or disability.	6	9	10	5
Applicants vulnerable due to alcohol dependency.	1	0	0	0
Applicants who were former asylum seekers.	0	0	0	0
Vulnerable for other special reason.	0	0	0	0
Applicant vulnerable due to drug dependency.	0	0	0	0

Priority Need Category	2008/09	2009/10	2010/11	2011/12
Applicant vulnerable having been in custody or remand.	0	0	0	0
Applicants vulnerable for formerly being in care.	0	0	0	0
Applicants vulnerable having served in HM Forces.	0	0	0	0
Applicants (with no children) vulnerable on account of violence including domestic violence.	3	3	1	1
Total applicants accepted for a priority need	71	48	58	60

- 2.3 The analysis of priority need groups shows that the number of applicants accepted for a housing need has increased in the past 2 years and that the largest household group accepted as being in a priority need for accommodation are households with dependant children which account for around 78% of the total. Due to the success of the Homelessness Prevention Service it should be noted that the number of homelessness applications accepted as having a priority need, unintentionally homeless and owed a full duty has reduced from 207 in 2005/2006 to 60 in 2011/2012, a reduction of 71% which is considered to be a major achievement.

3 Reasons for Homelessness

- 3.1 Information on reasons for homelessness acceptances in priority need groups is set out in the table below:

Reason for Acceptance	2008/09	2009/10	2010/11	2011/12
Parents not willing to accommodate	17	10	18	15
Other relatives not willing to accommodate.	0	4	4	5
Non violent relationship breakdown.	10	4	3	3
Violent breakdown of relationship (partner)	8	4	11	11

Reason for Acceptance	2008/09	2009/10	2010/11	2011/12
Violent relationship breakdown (involving associated person i.e. relative)	0	0	0	0
Racially motivated violence.	0	0	0	0
Other forms of violence.	1	1	0	1
Racially motivated harassment.	0	0	0	0
Other forms of harassment.	0	0	0	0
Mortgage arrears.	2	1	1	0
Local authority rent arrears.	0	0	0	0
Housing Association rent arrears.	0	0	0	1
Private rented rent arrears.	3	4	3	5
Termination of assured short-hold tenancy.	21	10	12	12
Reason other than termination of assured short hold tenancy i.e. tied accommodation.	1	7	5	7
Leaving asylum accommodation.	0	0	0	0
Leaving prison/remand.	1	0	0	0
Left hospital.	2	0	1	0
Left other institution or Care.	1	1	0	0
Leaving armed forces home.	2	0	0	0

Reason for Acceptance	2008/09	2009/10	2010/11	2011/12
Other reason.	2	2	0	0
Total	71	48	58	60

- 3.2 The figures show that the two most common reasons for acceptances of homelessness were on account of parents no longer willing to accommodate their children and loss of rented accommodation, including the end of an Assured Short-hold Tenancy and the loss of private rented accommodation.

Housing Advice

1. Introduction

- 1.1 Local housing authorities have a statutory duty to offer advice and assistance on homelessness and the prevention of homelessness. They also have a duty to ensure that an Allocations Scheme for determining priorities for allocating social housing is available for inspection and that a summary of that scheme is available, on request, free of charge.
- 1.2 Landlord authorities have a duty to provide their tenants with information on the express terms of their tenancies, including their statutory rights in respect of assignments, successions and assignments by way of mutual exchange.
- 1.3 Advice and assistance on homelessness and the prevention of homelessness can encompass a wide range of issues, many of which require specialist knowledge. Some cases, for example those involving debt management, are referred to the CAB. The CAB has a dedicated “money advisor” who deals exclusively with debt referrals from the Homelessness Prevention Team. Some cases may be referred to other agencies included the Council’s Benefit Division.
- 1.4 Advice is given on a range of other matters including:
 - Harassment
 - Illegal evictions by private landlords
 - Properties in need of repair, including those which are unfit for habitation
 - Houses in Multiple Occupation
 - Charitable organisations assisting homeless people (including victims of domestic violence)
 - Securing private rented accommodation
 - Access to shared ownership schemes
 - Property rights in cases of relationship breakdown or other domestic issues
 - Interim and temporary accommodation
 - Nominations to other local housing authorities

2. Provision of Information

- 2.1 A range of advice and information leaflets are made available, some produced by the Housing Directorate, others published by the National Homeless Advice Service and the CLG. Where English is not the first language of the client, assistance can be obtained through approved agencies and documents can be translated in appropriate cases. For the visually impaired, literature can be made available either in large print or by CD or Braille. The Council has published its Housing Application form in an easy-read format to meet the need of any applicants who have learning disabilities. In addition, the Housing Application form will soon be available to complete on-line. Where a profoundly deaf client is a sign user, the Council can arrange “signing” through an approved agency. A loop system for people with hearing difficulties is available at the Civic Offices and at the Area Housing Office (South) at The Broadway, Loughton. Home visits will be made in appropriate instances.
- 2.2 Under the HomeOption choice based lettings scheme, fortnightly Property Lists are produced and are available at housing offices and the Council’s Information Desks across the District giving details of properties in which homeseekers can express an interest.
- 2.3 The Council’s tenant’s magazine “Housing News” is sent to all tenants 3 times each year, and when appropriate, to all homeseekers providing advice on a range of Housing Services.

3. Liaison with the Citizens Advice Bureau

- 3.1 The CAB have offices in the District in Epping, Waltham Abbey and Loughton. The Council has a Service Level Agreement with the CAB to provide a range of advice and to support those who have difficulties expressing their needs effectively. The Council contributed £114,000 from its General Fund in 2011/12 towards CAB running costs.
- 3.2 The Council has formal arrangements for referring cases and, in addition to front-line liaison on a case by case basis, the Assistant Director of Housing (Operations), the two Area Housing Managers and the Housing Options Manager, meet with the Bureau's office Managers each quarter.
- 3.3 Where a client is pursuing a review of a homelessness decision made by the Council they are advised in writing to seek assistance from the CAB or Shelter. Often, where applicants seek advice from one of the CAB's, they in turn seek specialist advice from their dedicated solicitor.

Homelessness Prevention

1. Introduction

- 1.1 The Homelessness Prevention Team is an integral part of the Housing Options Service. The team is led by the Assistant Housing Options Manager (Homelessness), assisted by the Senior Homelessness Prevention Officer.
- 1.2 The work has proved highly effective which is explained at Section 2 below. As previously reported this has not only seen a huge reduction in the level of acceptances, it has also led to a high number of people being able to remain in their current homes.
- 1.3 The number of cases being dealt with through homelessness prevention exceeds the number of cases being dealt with as homeless. This approach has ensured that any unnecessary homeless applications no longer occur. However, despite this “gate keeping”, approach, the Council ensures that all its statutory duties are met under the Housing Act 1996 PT VII as amended and will always arrange for a homeless application to be received from a person who will require that safety net.

2. Statistics

- 2.1 Homelessness Prevention Officers now provide a comprehensive service with a range of initiatives at their disposal to assist them with resolving the housing difficulties of clients they are seeking to serve.
- 2.2 The table below shows the number of cases that presented to the Homelessness Prevention Service in the last four years and the reason, with the numbers of cases prevented set out in the final row:

Prevention Action	2008/09	2009/10	2010/11	2011/12
Mediation	3	4	8	4
Reconciliation	17	12	13	25
Financial payments from homelessness prevention fund.	0	4	4	3
Debt advice.	6	4	1	2
Resolving housing benefit problem.	14	9	5	3
Resolving rent arrears.	4	6	0	3

Prevention Action	2008/09	2009/10	2010/11	2011/12
Sanctuary scheme for victims of domestic violence.	4	2	2	2
Crisis intervention.	0	1	5	3
Negotiation to help someone remain in the private rented sector.	0	1	7	3
Providing other assistance to enable someone to remain in private rented sector.	9	29	16	13
Mortgage arrears.	1	19	12	21
Other homelessness prevention measure (where work has commenced but there has been no further contact and resolution is unknown).	192	165	159	134
Housed in hostel or HMO.	11	22	9	8
Housed in private rented sector with landlord incentive scheme.	75	63	61	53
Housed in private rented sector without landlord incentive scheme.	42	60	55	69
Accommodation arranged with friends or relatives.	16	12	26	46
Supported accommodation.	5	5	18	9
Social housing management move.	3	6	4	5

Prevention Action	2008/09	2009/10	2010/11	2011/12
Social housing: Housing Register offer.	29	19	39	30
Social housing: Housing Association direct offer.	1	1	5	6
Low cost home ownership scheme.	0	2	0	0
Other homelessness relieved.	28	5	14	4
Total Cases	580	549	557	547
Total cases prevented	460 (79%)	451 (82%)	463 (83%)	446 (82%)

2.3 During the period set out in the above table, the Prevention Service dealt with 2,233 cases of which 1,820 (82%) have been prevented. The figures do not take into account the many other enquiries made by the general public. This has been a considerable achievement. These results have had a direct impact on the homelessness acceptance rate, which has significantly reduced during the same period.

3. Preventing Homelessness Initiatives

3.1 The Council has a number of initiatives in place to assist those who have either lost their home or are facing eviction. All of these initiatives are set out in this section of the Strategy and form part of the Council's plan to assist homeless applicants through the current financial climate and to prevent re-possession.

4 The Epping Forest Housing Aid Scheme (EFHAS)

4.1 One of the difficulties that homeless and other housing applicants have in accessing the private rented sector (especially those in receipt of housing benefit), is to provide damage deposit guarantees in advance of occupation, which is routinely required by private landlords. Because of this, many homeless applicants have no alternative but to seek accommodation from the Council. If they are in a priority need category, the Council then has a legal duty to provide accommodation. In some circumstances, single homeless applicants have to be accommodated in bed and breakfast accommodation in the first instance, which is not only inferior to normal residential accommodation, it is also at a cost to the Council's General Fund.

4.2 The Epping Forest Housing Aid Scheme (EFHAS) is a scheme for helping homeless people to access private rented accommodation. It was set up in 1995 by a specially-created voluntary organisation as a registered charity, with financial support from the National Lottery Charities Board and the District Council, the respective contributions being £20,000 and £5,000. In early 2005, EFHAS learnt that their bid to the Big Lottery Fund for additional capital funding of £20,000 had been successful, which increased their funds to around £40,000 at that time. Furthermore, the Council's Cabinet agreed that £26,500 of additional CLG funding be used to assist the scheme in both 2011/2012 & 2012/13.

4.3 EFHAS is able to help homeless people by providing damage deposit guarantees to the landlords of the properties the applicant wishes to rent. All the guarantees are covered by money held in EFHAS's bank account. Furthermore, the Council has an Underwriting Agreement with EFHAS whereby it underwrites up to £40,000 of damage deposit guarantees in order to ensure that the guarantees did not over-commit EFHAS's available resources. Since the scheme has been introduced, the Council has not been called upon to payout any of the underwritten guarantees.

4.4 Between 1995 and June 2012, EFHAS helped 327 homeless families move into the private-rented sector in this way, who would otherwise probably have been unable. Many of these would have had to seek accommodation from the Council direct. All applicants to EFHAS come from within the Epping Forest District and are referred to EFHAS by the Council's Housing Directorate.

5 The Rental Loan Scheme

5.1 The Rental Loan Scheme was set up in 2008/2009 following the Council receiving a grant of £10,000 from the CLG in recognition of its excellent performance in preventing homelessness. The scheme complements the EFHAS scheme and provides applicants with a rental loan to meet the costs of the first month's rent in advance when securing accommodation in the private sector. Applicants are required to repay the loan on an interest free basis over 24 months, thereby re-cycling the budget to enable others to benefit from the scheme in the future. In December 2008, the Cabinet agreed that an additional £20,000 would be made available for the scheme in order to assist applicants during the current financial climate. Furthermore, the Council's Cabinet agreed that £26,500 of CLG funding would be used to provide further rental loans in both 2011/12 & 2012/13.

6. Housing Association Leasing Direct (HALD)

6.1 The Council set up a Housing Association Leasing Direct (HALD) scheme with Genesis Housing Association in July 2010. The Council has assisted six households who would have otherwise been homeless in accessing accommodation under the scheme through nominations made by the Homelessness Prevention Team. Those referred must be eligible for full housing benefit in order to qualify for assistance, with the household being able to remain in the property for 2 years under an assured short-hold tenancy. The Council is now working with another provider to set up a further scheme in the near future.

7 Parental Exclusions

7.1 Young people can sometimes have volatile relationships with their parents and can be at risk of exclusion from their home. Relate, who are a charity providing relationship support to people of all ages and backgrounds through its network of counsellors, receive referrals and seek a resolution to family difficulties and have an 80% success rate. In some cases, an exit plan is drawn up for the young person to move on to independent accommodation at the appropriate time. In the past year, the Homelessness Prevention Team has also worked with Essex County Council's Homelessness Response Team to also mediate between young people and families and provide other general support.

8 Young Parent Scheme

8.1 Railway Meadow is a supported housing scheme built in partnership with Brentwood and Uttlesford Councils in Ongar for young parents and is designed to help young people overcome challenges during their pregnancy and the first year of their child's life. The scheme consists of 13 self-contained flats with a communal lounge, activity area, training kitchen and office. The accommodation is offered to young Mothers, Fathers and couples aged 16-25 years. The support gives young people essential parenting and life skills to enable them to move on and live independent lives.

The scheme is owned and managed by East Thames and referrals are received from the Council, and Brentwood and Uttlesford Councils, with residents being re-housed by their host authority at the appropriate time. Epping Forest District Council has nomination rights to 8 of the flats.

9 Epping Forest District Sanctuary Scheme.

- 9.1 The Council's "Sanctuary" Scheme assists victims of domestic violence or Hate Crime on a tenure neutral basis, e.g. owner occupiers, tenants etc. The scheme provides a safe room within the victim's home. A typical sanctuary room would include a fire door with mortice locks, smoke detectors, fire blanket and two fire extinguishers. The victim would be supplied with a mobile phone to dial 999. The Council works in partnership on Sanctuary Schemes with the Safer Communities Team, the Essex Police Hate Crime Unit, Essex Fire and Rescue and Safer Places (formerly known as Harlow Women's Aid). All referrals to the scheme are through the Homelessness Prevention Team. Since its introduction, five Sanctuary rooms have been installed and have prevented homelessness.

10 Single Accommodation for Epping Forest (SAFE) Project.

- 10.1 SAFE is managed by NACRO Community Enterprises, a registered housing association and charity, which offers supported accommodation to single people. The scheme works in partnership with Social Care's Assessment and Child Protection Team, the Essex Probation Service, Connexions, the Youth Offending Team and In-Touch Support. The project is used in resolving the housing difficulties of single people across the District who otherwise would become homeless. SAFE was set up in 1993 with funding from the former Housing Corporation, the Council and the Probation Service. The Council provided SAFE land free of charge for the first of the developments and they now provide 37 Units of accommodation. This is in a mix of accommodation which is either shared or self contained.
- 10.2 Properties in the scheme are furnished and managed by SAFE, which lets them under a licence or an assured short-hold tenancy. Most residents are at the scheme for around one year. The scheme is managed by a Project Manager, supported by a Deputy Project Manager and three House Managers. Around 35% of all referrals are made by the Council with the balance being made from other key agencies. The main client group is 16-18 year olds, although people up to the age of 25 years are accepted. Those referred are assessed by one of the House Managers with a report on each case being referred to the SAFE Panel (comprising representatives from key agencies) for consideration. Those not accepted onto the scheme can appeal against the decision. On average there are 20 admissions annually to the scheme.
- 10.3 The Council provides move on accommodation by providing SAFE residents with priority under the Council's Housing Allocations Scheme, by placing them in Band 1 after 6 months at the SAFE Scheme

11 Mortgage Rescue

- 11.1 In January 2009, the CLG announced the introduction of the Mortgage Rescue Scheme. The intention of the scheme is to assist the most vulnerable households who are at risk through re-possession. Referrals can only be made where householders have between 20% negative and 40% positive equity. Mortgage Rescue is a last resort when all other lender "hardship tools" have been exhausted. Following consultation with the Citizens Advice Bureau's (CAB) debt advisor on the financial viability of the rescue, the case is referred to the lead provider for Essex being Moat Homes Limited. Depending upon the available equity, the applicant will be assessed for either "mortgage to rent" or a shared equity loan. The Council has been commended by the CLG for its assistance in taking this initiative forward and for referring cases soon after the commencement of the scheme.

11.2 Between 1 July 2009 and 1 July 2011, the Council, in partnership with the, Moat Homes Limited, assisted a total of 7 households to keep their homes through Mortgage Rescue. However, since July 2011, no further households have been assisted because of restrictions that have been placed upon the scheme by the Government. These include the price cap on the value of a property being reduced to less than £200,000 with only freehold properties being rescued (i.e. houses not flats). As the values of most, if not all eligible properties in the District are well above the cap, the use of Mortgage Rescue is now therefore limited.

12 Rough Sleeping

12.1 The Council has only identified a very small number of rough sleepers within the District. Much of this is due to the work of the Homelessness Prevention Team. The CLG awarded a grant to all Essex authorities to assist with the prevention of rough sleeping in 2011/12. The Council received £4,500. In order to continue to prevent any rough sleeping in the District the grant was passed to both Colchester and Chelmsford night shelters equally, which enables the Council to continue to nominate those threatened with rough sleeping to the two shelters.

13 Preventing Repossession Fund

13.1 The Council received a grant of £47,500 from the Communities and Local Government (CLG) at the end of June 2009, to enable the Council to extend small loans to families at risk of homelessness through repossession or evictions. In March 2012, a further grant of £30,000 was received as part of a preventing re-possession national allocation. The Government issued guidance on the use of the grant and is keen that it supports the maximum number of households in need of financial assistance during these difficult times, enabling them to remain in their own homes.

13.2 Under the Government's guidance, financial assistance through small interest free loans ranging from £1,000 to £3,000 per household capped to a maximum of £5,000 available interest free is made available. Final decisions on how the money is deployed rest with the Council and are based on individual local need and circumstances. In addition to homeowners, the funding is to be used to assist residents in all forms of tenure that are struggling with their rental payments and face eviction.

13.3 Loans are agreed by senior officers and are repayable by the applicant over a period of 1-5 years depending upon the size of the loan and the circumstances of the applicant. This allows the money to be re-cycled to help other households in the future. Only those households who, following investigations, are found to be genuinely unable to pay their rent or mortgage, due to "income shock" caused by loss of earnings where there is no history of previous arrears, are able to benefit.

13.4 Loans are only to be agreed, when the recipient is prepared to act on debt advice to make repayments more affordable following the intervention of an advisor. They will be provided where lenders cannot apply forbearance measures due to the level of arrears, but will freeze possession action as a result of the loan, on the basis that all parties are prepared to compromise on the debt owed and should be made to recover the position, (rather than fully clear arrears) where all other options have failed. Loans are not made where there are other ways to resolve the problem. For example, if the arrears are caused by housing benefit delays, assistance should be given in dealing with the matter. Loans are only made where it would enable a household to remain in place where no other option would lead to this outcome.

14. Discretionary Housing Payment

- 14.1 Discretionary Housing Payments (DHP) are sums of money paid to people who need help with their housing costs. Private sector tenants who have a change of circumstances, such as a loss of employment, may find that their contractual rent is higher than their housing benefit entitlement. DHPs can help private sector tenants meet the shortfall and prevent them going into arrears and subsequently becoming homeless. Payments are made over a short period until the tenant's circumstances improve or they obtain more affordable accommodation. In 2011/2012, £29,000 in Discretionary Housing Payments was allocated.

Support schemes, welfare and mediation services

1. Introduction

- 1.1 A number of support schemes are in place in the District to support people who have been homeless or may be at risk of being homeless. There are two floating support schemes provided in the District by Safer Places (formerly Harlow Women's Aid) and Family Mosaic (formally "In Touch Support").

2. Safer Places Floating Support Scheme (Stay Safe)

- 2.1 This is known as the 'Stay Safe' scheme and was launched in January 2003, funded through Essex County Council's Supporting People Team and can assist up to 14 households at any one time.
- 2.2 The aim of Stay Safe is to assist women experiencing (or at risk of) domestic violence to remain safely in their own homes. It can also be used to support women moving on from a refuge. There is access to a 24 hour emergency help line with contact being made by a Support Worker at least once each week. Risk assessments are undertaken and, if it is safe, meetings take place in clients' homes. Otherwise, local drop-in centres are used. On average, the support worker will spend around 3 hours per week on each case. Plans are made, setting out the action required to provide the practical support, information, advice and guidance needed in each case. These are kept under review with risk assessments updated.
- 2.3 Although referrals to Stay Safe may be made by other agencies, many are made through the Council's Homelessness Prevention Team. A number of referrals are also made from the Multi-Agency Risk Assessment Conference (MARAC).
- 2.4 Applicants can visit the drop-in centres and have access to a solicitor, if required. They can also attend various support sessions.
- 2.5 Stay Safe has a full-time Support Worker in the District who reports to an area co-ordinator based in Harlow and is also responsible for managing three Support Workers at similar schemes in East Hertfordshire, Broxbourne and Harlow.

3. Multi Agency Risk Assessment Conference (MARAC)

- 3.1 The Multi Agency Risk Assessment Conference (MARAC) draws together key agencies in a local forum to co-ordinate actions and resources towards addressing the highest risk victims of domestic violence. The Housing Options Team participates in the MARAC process and attends meetings.

4. The Tenancy Support Scheme

- 4.1 The Council works with the County Council's Housing Related Support Team's appointed provider of housing related support, Family Mosaic, to provide support to vulnerable people who are housed in Council and other accommodation.
- 4.2 The Council is represented on a Panel of Stakeholders including Family Mosaic, the Community Mental Health Team, and Community Drug and Alcohol Team which meets monthly to discuss prospective referrals and operational issues.
- 4.3 Once a person is accepted onto the scheme, they receive support from the floating support worker until they have sufficient skills to live more independently.
- 4.4 This is the only scheme of its kind in Essex.

5. Family Mosaic

- 5.1 In addition to providing floating support through the Tenancy Support Scheme, Family Mosaic provides floating support to vulnerable people irrespective of tenure across the Epping Forest District.
- 5.2 The service also provides a high level of support to homeless applicants placed in bed and breakfast accommodation.
- 5.3 The Support Worker provides agreed levels of support with the client. This will include acting as a key link with other agencies and preparing the client to acquire the skills needed to sustain a permanent tenancy.
- 5.4 Support Workers also provide a service to people whom the Council does not owe a duty under homelessness legislation. All referrals to the scheme for those living in bed and breakfast accommodation are through the homelessness assessment officers.
- 5.5 The Assistant Housing Options Manager (Homelessness) meets on a monthly basis with Family Mosaic Managers to discuss contact and service delivery matters.

6 Essex National Probation Service

- 6.1 The Housing Options Section works with the National Probation Service's Housing Liaison Officer on cases referred by the Service. If a full housing duty is owed to the person referred, then the Council will continue to work with the Probation Service to ensure that they are able to sustain any permanent accommodation offered. A Protocol is in place between the Council and the Probation Service which sets out the way in which the service will be delivered effectively.

7 North Essex Mental Health Partnership

- 7.1 The Housing Options Section works in partnership with the North Essex Mental Health Partnership to ensure that housing advice and assistance is provided to people who are suffering from mental illness. The Council will arrange to visit clients either at their current place of residence or in hospital to discuss their housing situation. Clients may be provided with bed and breakfast accommodation in the first instance with a referral being made to Family Mosaic so that housing related support is provided from the outset. The Mental Health Team carry out their own assessment of the client's ability to live independently. In addition, some clients with low level mental health needs are placed in the Council's short-term accommodation at Hemnall House, Epping. A Protocol is in place between the Council and the Mental Health Partnership which sets out the way in which the service will be delivered effectively.

8. Multi-Agency Protection Panel Arrangements

- 8.1 The Council is a member of the Multi-agency Protection Panel Arrangements (MAPPA). The Panel is co-ordinated by Essex Police and manages high risk offenders. The Housing Options Manager and the Assistant Housing Options Manager (Homelessness) attends when cases are being considered involving homeless applicants who are seeking assistance from the Council.

The Role of Essex County Council's Social Care

1. Introduction

- 1.1 There have been changes to Children's Social Care at Essex County Council. The majority of children's services are now provided on a 'quadrant basis' (Essex has been split into four geographical areas with each area being a quadrant) and children in the Epping Forest District receive services from the 'West Essex Quadrant'. Many staff providing services for Children in the Epping Forest District (under the West Essex Quadrant) are now located at Goodman House in Harlow.

2. Leaving and After Care Team

- 2.2 The Leaving & After Care Team is quadrant-based and located at Goodman House, Harlow. The team takes casework responsibility for children up to the age of 15 years and six months. The team provide support whilst the young people are in care, for example: assessing need, creating "Pathway plans" and assisting in the transition process of young people moving on from care. The team also provides aftercare support according to the specific provisions of the Children Act 1989 as amended by the Children Leaving Care Act 2000.
- 2.3 The Council's Homelessness Prevention Team are notified by the Leaving and After Care Team prior to a young person leaving care in order that their housing needs can be assessed. In general, the Council arranges for NACRO (a housing association providing specialist housing and support for young people) to accommodate young people leaving care in the SAFE Scheme (see paragraph 10.1 page 22) to give them extra preparation for independent living. The Council then re-houses the young person when they move on from NACRO into Council accommodation with Floating Support.

3. Homeless Response Team

- 3.1 The Homeless Response Team is a small, centrally based team (located at County Hall, Chelmsford) which seeks to engage with 16 & 17 year olds on the verge of parental eviction and mediates with families to avoid homelessness and the necessity of providing accommodation under Section 20 of the Children Act 1989.
- 3.2 The team works in partnership with the Council's Homelessness Prevention Team and carries out joint assessments either through planned sessions or in response to urgent requests (whenever this is possible).

4. Assessment & Intervention Team

- 4.1 The Assessment and Intervention Team is also quadrant-based and located in Goodman House, Harlow. The Team respond to the immediate needs of children and families referred to Children's Social Care where an assessment of that need is required and especially in relation to "Safeguarding" (Child Protection) and "Children in Need". Referrals to this service are through the central Initial Response Team, with reference to Essex County Council threshold criteria.

5. Family Support & Protection

- 5.1 The Family Support and Protection Team is Quadrant-based at Goodman House, Harlow responding in the longer term for those children subject to Child Protection Plans, and Child in Need plans, with reference to Essex County Council threshold criteria.

6. Learning Disability and Physical Impairment Team

- 6.1 The Learning Disability and Physical Impairment Team are quadrant-based and located at Goodman House, Harlow. New referrals are initially received by a central Essex team (Social Care Direct) and then forwarded to Goodman House for further assistance. The Learning Disability and Physical Impairment Team refer people requiring housing and support to schemes called Barnes Court, and Tolpuddle House in Ongar which are owned and managed by East Thames Housing Association.

7. Community Assessment Team for Older People

- 7.1 The Community Assessment Team for Older People are quadrant-based and located at Goodman House. The team assist people aged over 65. Initial referrals are received first by a central Essex team (Social Care Direct) and then passed where necessary to Goodman House, Harlow.

8. Safeguarding Adults

- 8.1 The Council has a Corporate Safeguarding Group. Key staff have received training on Safeguarding vulnerable adults. The Council has a Safeguarding Strategy and a reporting form and has an e-learning package available to all staff.

Services for people involved with drug and alcohol abuse

1. The Community Drug and Alcohol Team (CDAT)

- 1.1 The Community Drug and Alcohol Team (CDAT) are based in Harlow.
- 1.2 The team assists clients suffering with drug and alcohol abuse. The staff includes a Clinical Psychiatrist, Clinical Psychiatric Nurse and a Social Work and Administration Team.
- 1.3 Clients are referred to CDAT through a number of channels including hospitals, the Alcohol and Drug Advisory Service (ADAS), GPs, family members and self-referrals; with a minimum age for clients being 16 years and no upper age limit. People with alcohol problems far outnumber those with drug problems.
- 1.4 All CDAT clients are risk assessed, with particular attention being paid to any risks linked to abuse, for example, mental health problems, risk of violence to self or others, and neglect. All clients have a physical assessment and a community care plan. A Panel meets monthly to prioritise cases.
- 1.5 Some clients may be referred for rehabilitation, which may be residential, usually for 6 months, or may be day attendance based. These services are provided outside the local area, which is seen as beneficial to clients.
- 1.6 There is an agreed protocol for the provision of the service. There is a high success rate which has resulted in low levels of repeat homelessness, with many clients being able to sustain a permanent tenancy.

Homelessness Assessments, Decisions, Notifications and Reviews

- 1.1 Around 80% of homelessness interviews are conducted by prior arrangement, helping staff to manage workloads and clients to avoid long waiting times. Home and hospital visits are offered when appropriate. Where English is not the first language of the client, staff are able to call upon interpretation services. A 'point card' can be used to establish which language is required and immediate translation can be effected by telephone. Document translation can also be arranged in appropriate cases.
- 1.2 The process of assessing applications is complex and governed by legislation. As homelessness law is always changing, all staff are kept up to date on any case law that may affect the decision-making process.
- 1.3 The Council adopts a firm but fair approach to homelessness, placing applicants in accommodation when statutorily required to do so. Referrals are only made to Homelessness Assessment Officers if the Homelessness Prevention Team has explored every avenue in preventing homelessness. This approach has brought about a significant drop in homeless referrals.
- 1.4 Investigations include contact with previous landlords (both public and private), mortgage lenders, solicitors, Environmental Health Officers, Land Registry, Social Workers, Medical Practitioners, Occupational Therapists, hospital workers, victim support groups, Police, neighbours, relatives, and the Immigration & Nationality Directorate.
- 1.5 These investigations rest with the Homelessness Assessment Officer, who arranges interim and temporary accommodation as necessary. All homelessness decisions are signed off by the Assistant Housing Options Manager (Homelessness) prior to the applicant being notified of the decision.
- 1.6 Due to the shift in emphasis to prevention, the Homelessness Service was re-structured in 2010. There is now just one full time homeless caseworker and five FTE Homelessness Prevention Officers being a ratio 1:5 between Homeless Case Workers and Homelessness Prevention Officers which is the national norm.
- 1.7 Progress of homelessness applications is monitored and overseen by the Assistant Housing Options Manager (Homelessness). The Director of Housing chairs quarterly Customer Improvement Meetings which the Housing Options Manager attends to discuss performance over a range of indicators including homelessness.

2 Out of Hours Service

- 2.1 The Council provides a 24 hour 365 day per year emergency out-of-hours homeless response service. Members of the Homelessness Team are on call on a duty rota and will respond to cases where a person, for example, could become homeless due to fire or flood.

3. Reviews

- 3.1 Following any homelessness decision, applicants are advised of their legal right to request a review of the decision and agencies that can assist them in the review process including the CAB and Shelter.
- 3.2 Legislation requires that a request for a review of a homelessness decision should be made within 21 days of the notification of the original decision. If appellants request a review outside of the deadline, the Council may offer additional time depending upon the circumstances.

- 3.3 Some reviews are carried out by an officer senior to the person who took the original decision and had not been involved in the original decision. The Code of Guidance is observed with all reviews.
- 3.4 However, many decisions on non-homeless and intentionality are considered by the Housing Appeals and Reviews Panel which comprises five District Councillors. Applicants are able to put their case both in writing and in person at Panel meetings. If they prefer, they can appoint a third party to represent them, for instance, a solicitor, friend, Ward Member or a representative from Shelter or the CAB.
- 3.5 All statutory reviews are completed within the statutory 56 days, unless otherwise agreed with the applicant. Ample time is given to applicants to provide documentary evidence prior to any decision being made.
- 3.6 If a homeless applicant is dissatisfied with a decision made at a statutory review, provided their application is made within 21 days of the statutory review decision, they have the right to pursue a further review on a point of law through the County Court. This is explained to applicants in decision letters.
- 3.7 Where a homeless applicant is in priority need and not intentionally homeless but has no local connection with the District, they may be referred to another local authority where they do have a connection. Although there is a national Local Authority Agreement on which council is responsible for taking homelessness responsibility. Should there be any dispute between local authorities on who owes the duty; an accredited arbitrator may be appointed by mutual agreement to resolve the matter. The Council has only appointed an arbitrator on one occasion when the case was found in the Council's favour.

Accommodating Homeless Households

1. Introduction

- 1.1 Where a local housing authority has reason to believe that a homeless applicant has a priority need for accommodation, it has a statutory duty to arrange interim accommodation for the applicant, pending completion of enquiries into the case. This duty arises under Section 188 of the Housing Act 1996 Part VII as amended. If, on completion of enquiries, it is decided that a full housing duty is owed to the applicant, temporary accommodation must be arranged until the full housing duty is discharged. This duty arises under Section 193.
- 1.2 The Council uses a variety of interim and temporary accommodation including its Norway House hostel, and a small block of self contained flats at Hemnall House, Epping where tenants receive out-reach support from hostel staff. Over recent years, the numbers of homeless applicants placed in the Council's own housing stock has substantially reduced due to other options being available. The Council nominates homeless applicants to its Domestic Violence Scheme and often, for management reasons, provides Bed and Breakfast accommodation to single people.
- 1.3 The table below shows the distribution of households between the different types of temporary accommodation for the past 4 years.

Year	Norway House	Hemnall House	Fresh Start	Non-secure tenancies	Brook Haven	Women's Refuges	B&B	Total
2008/09	22	7	13	4	4	0	10	60
2009/10	19	8	8	0	5	0	7	47
2010/11	27	8	1	0	5	0	5	46
2011/12	33	8	1	3	5	1	8	59

2. Homeless Persons' Hostel Norway House, North Weald

- 2.1 The Council's hostel, Norway House, North Weald (a Grade II listed building) underwent a major refurbishment and improvement scheme in 2004/05.

- 2.2 The hostel has a number of facilities including an enclosed garden which provides a play area for children under 5 and a play area for older children equipped by a group of volunteers, raising funds mainly through grants from Essex County Council Community Partnership and Essex Youth Development and Child-Care Partnership. The Council works with the Norway House Stakeholder Partnership which comprises representatives from local schools, Churches and Health Service staff. The group aims to generally improve the quality of life for residents.
- 2.3 Norway House has ample parking facilities and a large secure store for residents' furniture, should they be unable to accommodate all their possessions in their rooms. Homeless households in other accommodation can also benefit from the storage.
- 2.4 There are 32 rooms on the ground and first floors which are let individually or as suites, as necessary. Four attic rooms have been refurbished, with their own private facilities. Two additional rooms are reserved for night and week-end emergencies, with beds made-up ready for use. Residents have use of communal kitchens, common rooms and laundry facilities. Over the last three years, the majority of rooms have been provided with their own bathroom facilities with the remainder being converted within the next year. A previously unused area outside of the communal kitchen has recently been converted into a meeting room.
- 2.5 The former Caretaker's accommodation has been converted to provide three separate rooms for 16-17 year olds in order to meet the Government's requirement to stop the use of bed and breakfast accommodation for this younger age group. Residents provide their own furniture, but where necessary basic items of equipment such as beds can be supplied from hostel stores.
- 2.6 In 1992, in response to an increase in homelessness at that time, five chalets providing accommodation for 10 families were built in the grounds to the rear of the main hostel, and continue to provide a valuable contribution to the assistance Norway House can provide.
- 2.7 The hostel has 5 staff supervised by the Assistant Housing Options Manager (Homelessness). The hostel team includes the Manager, two Deputy Managers, a Caretaker and a part-time Cleaner. Hostel Management staff have a small office near to the entrance of the main building with a service reception area for residents' enquiries.
- 2.8 The hostel has a door-entry system for the main building and closed circuit television cameras cover external doors, parking areas and some communal areas internally. These systems are controlled from the Manager's office.
- 2.9 Office opening hours are 9 am to 5 pm weekdays. A service is also provided on Saturday mornings for between 2 and 4 hours. In addition, some cover is offered on Bank Holidays. The Manager and Deputy Managers are on call on a 24 hour, 365 day basis to deal with emergencies.
- 2.10 On admission to the hostel, residents are given a 'welcome' pack, which includes information about local schools, health services etc. They are helped to apply for housing benefit, if necessary, and a Supporting People Tenant Support Plan is maintained.
- 2.11 Residents have a licence agreement which sets out the conditions by which they live at the hostel.
- 2.12 A newsletter is published on a two-monthly basis to keep hostel residents informed on matters of general interest.

3. Hemnall House, Epping

- 3.1 Hemnall House comprises 10 units of accommodation on two floors, mainly small studio flats with shared facilities, although there are some larger self-contained units.
- 3.2 The flats are occupied on a non-secure tenancy with the accommodation being carpeted and the kitchens equipped with refrigerators and cookers. Residents have use of a communal laundry room.
- 3.3 Staff offer support to tenants on an out-reach basis and visit the scheme each week. The flats are let to families with no more than 2 children (because of the limited size of the flats) who are able to live more independently than those at the hostel.
- 3.4 Some residents may be referred to Family Mosaic where additional support is needed.

4. Bed and Breakfast Accommodation

- 4.1 Following a competitive tendering exercise, the Council has appointed a number of hotels both within and outside of the District to provide bed and breakfast accommodation. All hotels used have been inspected to ensure that they provide adequate living conditions and meet all health and safety requirements. Fire Safety Risk Assessments are monitored on a six-monthly basis.
- 4.2 EFDC has on average 5 single people living in bed and breakfast accommodation at any one time who are generally housed there as a last resort for management reasons. The vast majority of occupants receive housing benefit.

5 Women's Refuges

- 5.1 The Council, in partnership with East Living provided the first Women's Refuge in the District, which opened in April 2005. It has a wide range of facilities and is supervised by a Scheme Manager and a part-time assistant.
- 5.2 It comprises 3 x 1 bedroom and 2 x 2 bedroom self-contained flats with their own kitchens and bathrooms. A Health Visitor attends regularly and the Scheme Manager ensures that all the tenants have access to a G.P. Legal advice is provided by a visiting solicitor. The Scheme Manager helps with training residents and assisting with issues such as returning to work with good links with local schools and nurseries being established.
- 5.3 Residents have assured short-hold Tenancies that can be renewed if they are not ready to move on. In order to be accepted on the scheme, residents must have been accepted for either the interim or full homelessness duty by the Council.
- 5.4 Safer Places is an independent domestic abuse charity dedicated to supporting adults and children affected by domestic abuse. They have refuges in Harlow, Broxbourne and Southend providing supported accommodation for up to 273 women. They also offer and outreach and floating support service in five Hertfordshire and Essex areas including the Epping Forest District. The outreach service is for women who either cannot or will not go into a refuge. The Homelessness Prevention Team would refer households fleeing domestic violence for a refuge space. In addition, referrals are also made to Women's Aid a national charity working to end domestic violence against women and children. They support a network of a range of domestic and sexual violence services across the UK.

6 Localism Act 2011

- 6.5 Under the Localism Act, although a Government Commencement Order is yet to be issued, it is proposed that councils will be given powers to discharge their Homelessness Duty by offering suitable accommodation in the private rented sector with or without the consent of the applicant. The accommodation must be provided for a minimum term of 12 months in order to end the Council's duty. If the accommodation is lost by the applicant within a period of 2 years of the offer then they can re-apply, regardless of priority need and if appropriate referred back to the host authority. When the Government Commencement Order is received, the Council will be considering whether it wishes to use these powers and agree a policy on when private sector offers will be made.

Consultation

1. A consultation exercise on the Strategy has been undertaken with all partner agencies, the Communities and Local Government's Special Advisor on Homelessness, the Housing Scrutiny Member Panel and Town and Parish Councils. The Strategy was approved by the Housing Portfolio Holder in September 2012.
2. The Council undertakes periodic consultations with its customers including customer interview exit surveys. The homelessness service forms part of the three yearly tenant's satisfaction survey with all Housing Services.
3. The Housing Scrutiny Panel will review the Action Plan on a regular basis.

3. Action Plans

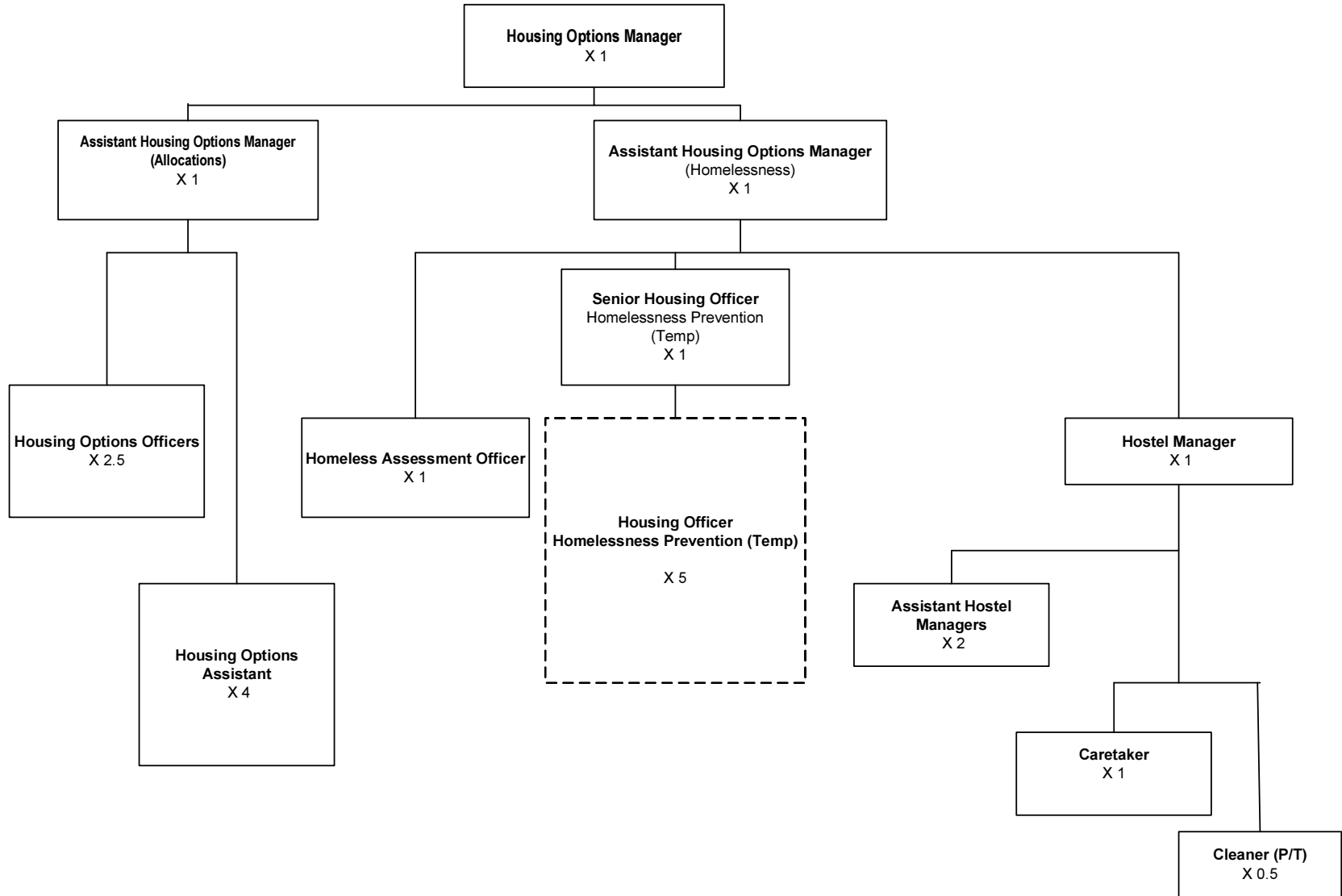
APPENDIX ONE

Action	Priority	Target Date	Comments	Responsibility
Continue to keep the number of households in temporary accommodation to a minimum and within the Council's Key Performance Indicator target of 60 households	High	On-going	In 2011/12 the target was achieved. However, due to the current financial climate at the cost of private rented and owner-occupied accommodation and the proposed Welfare Reforms the numbers in temporary accommodation is expected to rise	Housing Options Manager
Continue to keep the use of bed and breakfast accommodation for the single homeless to a minimum	High	On-going	Bed and Breakfast accommodation will only be used for the single homeless where there are severe management difficulties	Asst Housing Options Manager (Homelessness)
Continue to ensure 40% affordable housing on large development sites	High	On-going	This will be achieved through local plan	Director of Housing
Continuously Review the financial and underwriting support given to the Epping Forest Housing Aid Scheme	High	On-going	This is essential in tackling homelessness	Housing Options Manager
Expand the "Sanctuary" Scheme for victims of domestic violence and hate crime	Medium	On-going	5 schemes currently in place	Housing Options Manager
Review the budget for Rental Loan Scheme	Medium	On-going	This is essential in tackling homelessness`	Housing Options Manager

Action	Priority	Target Date	Comments	Responsibility
Increase the number of properties the provided by the Housing Association Leasing Schemes (HALD) with both Omega and Genesis Housing Associations	High	On-going	A key initiative in preventing homelessness	Housing Options Manager
Consider the findings and recommendations of the CIH's Study into the effects of the Welfare Reforms on homelessness in the District and formulate appropriate action plans	High	September 2012	The CIH has been commissioned to undertake a Study into the effects of the Welfare Reforms on the Council, its tenants, private tenants and homelessness	Director of Housing
Work with the Essex Consortia to agree the allocation of addition funding to Essex Authorities that has been received from the CLG to assist single homeless people and rough sleepers	High	December 2012	When the Council receives its allocation, consideration will be given to how the additional resource can be best used to assist this client group	Housing Options Manager
Complete the conversion works to provide designated bathroom facilities for each room at Norway House	Medium	December 2012	More than 90% of all rooms already have their own designated bathroom	Housing Options Manager
Introduce a policy on whether the Council will discharge its homelessness duty in the private rented sector with or without the applicant's agreement and in which circumstances	Medium	January 2013	A policy will be considered when Government Guidance has been received	Assistant Director of Housing (Operations)

Action	Priority	Target Date	Comments	Responsibility
Undertake a review of the Housing Allocations Scheme	High	April 2013	Government Guidance received July 2012	Assistant Director of Housing (Operations)
Consider installing separate bathroom facilities in the chalets at Norway House under future Housing Improvements and Enhancements	Medium	April 2013	Currently, two households living in adjacent chalets share a bathroom	Housing Options Manager
Keep under review the possibility of additional chalets at Norway House	Low	March 2014	This no longer a priority on account of fewer numbers of households in temporary accommodation	Director of Housing

Epping Forest District Council
Housing Options Section



Establishment:
Officers (Full time) = 18
Officers (Part time) = 6

Staff Total = 21



Epping Forest District Council

Housing Directorate
Civic Offices, High Street, Epping, Essex CM16 4BZ
Phone 01992 564000
www.eppingforestdc.gov.uk/housing

Housing Directorate

August 2012



CUSTOMER SERVICE EXCELLENCE



INVESTOR IN PEOPLE



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Report to Housing Scrutiny Standing Panel

Date of meeting: 24 July 2012

Portfolio: Housing – Councillor D Stallan

**Subject: HomeOption Choice Based Lettings
Scheme – Progress Report**

**Officer contact for further information:
Roger Wilson extension 4419**

**Committee Secretary:
Mark Jenkins extension 4607**



Recommendations/Decisions Required:

That the Housing Scrutiny Panel reviews the Information Bulletin setting out progress made on the HomeOption Choice Based Lettings Scheme, and considers the Housing Register Activity Report, both for the period 1 June 2011 to 1 June 2012.

Report:

1. As part of its Work Programme, the Housing Scrutiny Panel considers an annual report on the "HomeOption" Choice Based Lettings Scheme.
2. The Choice Based Lettings Scheme was introduced in November 2007, which was necessary to meet the requirements of Government at that time that such a scheme be in place by 2010 at the latest. The scheme is administered by the external Choice Based Lettings agency Locata Housing Services (LHS). Under the scheme, all vacant social rented properties are advertised to applicants on the website, a two-weekly publication and other media giving details of location, type, rent, service charge, council tax band and landlord of the available accommodation. Applicants apply for a property by "expressing an interest" in up to a maximum of three properties for which they have an assessed need, either in person, by post, telephone, text, email or Internet.
3. At the end of the two weekly cycle, the Council analyses the "expressions of interests" received and allocates each property following a prioritisation and selection process in accordance with its own Allocations Scheme. In general terms, the property is offered to the applicant in the highest band, who has been registered the longest, who had "expressed an interest" for the specific vacancy. The results of the "expressions of interest" on each property advertised is then published on the website and the next periodic Property List, setting out the number received on each property, as well as the Band and registration date of the successful applicant. This helps applicants to see how long the successful applicant has been waiting and gives greater transparency in the allocation of accommodation, as each applicant would be able to clearly understand how the scheme works.

4. The Council is a member of the Herts and Essex Housing Options Consortium (HEHOC) which jointly operates the Choice Based Lettings Scheme and consists of following six authorities:

- Brentwood Borough Council
- Chelmsford City Council
- Broxbourne District Council
- Epping Forest District Council
- Uttlesford District Council
- East Herts District Council

HomeOption Choice Based Lettings Information Bulletin

5. The HomeOption Choice Based Lettings Information Bulletin for the period 1 June 2011 to 1 June 2012 is attached as an appendix to the report.

6. As can be seen, 380 properties (including Housing Association lets) have been allocated during the period. Some properties have been advertised on more than one occasion as they are difficult to let (particularly those designated for older persons' use) which has resulted in 415 advertisements being placed on the Website and in the Property Lists. With 35,777 expressions of interest being made, this is an average of around 86 expressions of interest each time a property is advertised. Most properties, apart from the difficult to let older persons' properties referred to, attract in excess of 200 expressions of interest. Almost 96% of applicants expressing an interest in properties did so over the Internet.

7. Around 58% of all applicants registered on the Housing Register have participated in the scheme during the last year. LHS confirm that, nationally, this is a high participation rate. Some applicants may not participate for a variety of reasons including:

- Joining the Register to accumulate time on the list, should they want Council accommodation in the future.
- Homeless applicants who are under a deferment period of three months following notification of the Council's homelessness decision. The three-month deferment is in place to balance the needs of homeless applicants against those on the Housing Register
- Applicants who wish to move to smaller accommodation and may be biding their time until a property becomes available that meets all of their aspirations.

Housing Register Activity Report

8. The Housing Register Activity Report for the same period, which is also attached, shows the number of lets and refusals and number of applicants in each of the six priority Bands. As at 1 June 2012 there were 6,219 applicants on the Housing Register.

Allocation of Accommodation – Government Guidance

9. In January of this year, the Department for Communities and Local Government issued a consultation paper on “Allocation of accommodation: guidance for local housing authorities in England”. The Housing Scrutiny Panel considered the proposals, one of which was the introduction of an eligibility criteria for applicants both joining and remaining on the Housing Register. As part of its response, the Panel welcomed the proposal which could result in large numbers of applicants being excluded from the list. As already mentioned, the attached Information Bulletin shows that there are 6,219 applicants on the Council’s Housing Register with 2,637 applicants whom have never bid. Furthermore, 4,286 applicants have not bid on properties since November 2011. Although the final Government Guidance has not yet been published, this could suggest that a more restricted eligibility criteria could be a way forward.

Surveys of Applicants

10. In May 2011, a survey of all housing applicants was undertaken in order to seek their views on the Choice Based Lettings Scheme. The results were reported to the Housing Scrutiny Panel in July 2011. It was considered important at that time to seek the views of applicants about the scheme. Those who were participating felt they were getting enough information about the scheme, found the website easy to use, with the majority being either very or quite satisfied. It was not considered appropriate to consult with applicants in 2012, particularly as many existing applicants could be removed from the list if the eligibility criteria referred to earlier is implemented.

Support Currently Provided to Vulnerable Applicants

11. The Allocations Team within the Housing Options Section offers a great deal of support to vulnerable applicants including:

- A list of all vulnerable applicants is maintained. The list is compiled by referrals made by Scheme Managers, other Housing Directorate staff and external agencies.
- All Scheme Managers are given lists of older tenants they visit who are on the Housing Register. When visiting, they ensure the residents fully understand how to participate in the Choice Based Lettings Scheme.
- When any new applicant joins the Housing Register, they are given an Information Pack which gives details of the scheme and how assistance can be obtained.
- Articles have been included in the tenants’ magazine, “Housing News” in the past on how the scheme operates, explaining that applicants can seek assistance from staff.
- A letter is sent to all those who are not participating in the scheme for more than 6 months asking them if they wish to remain on the Housing Register, but more importantly, asking if they require any assistance in participating in the Scheme.
- Access to the Scheme is provided electronically by way of a “kiosk” currently provided in receptions at the Area Housing Office (South) at The Broadway, Loughton and at the Limes Centre in Chigwell. The kiosks also give access to a range of other Council services
- Staff are able to refer applicants to Supporting People’s floating support provider

Family Mosaic for assistance with a range of housing-related support matters, including participating in the HomeOption scheme.

- All Housing Options staff are very experienced in providing support to all applicants.

12. The Housing Scrutiny Panel is asked to review progress made on the HomeOption Choice Based Lettings Scheme.

Reason for decision:

To submit a report on progress with the HomeOption Choice Based Lettings in accordance with the Housing Scrutiny Panel's Work Programme.

Options considered and rejected:

Not to submit a report on progress with the HomeOption Choice Based Lettings Scheme.

Consultation undertaken:

The Tenants and Leaseholders Federation will consider the report at its next meeting.

Resource implications:

Budget provision: N/A

Personnel: N/A

Land: N/A

Community Plan/BVPP reference: N/A

Relevant statutory powers: Housing Act 1996

Background papers: None

Environmental/Human Rights Act/Crime and Disorder Act Implications: N/A

Key Decision reference: (if required) N/A

APPENDIX

HomeOption – Information Bulletin

(1 June 2011 – 1 June 2012)

Number of properties let (including Housing Association lets)	380
Number of advertisements	415
Advertisements by property type	Flat 268 House 71 Maisonette 41 Bungalow 35
Number of expressions of interest during the period	35,777
Number of applicants on the Housing Register (June 2011)	6,219
Number of applicants not participating in the scheme	2,637 (42%)
Method of expressing an interest	Internet 95.81% Phone 1.79% Staff help 0.99% Coupon 0.82% Text 0.59%

Band	Number of Lets	Number of Refusals (Excl RSL)	Number of Applicants At June 2011
One	122	31	148
Two	2	Nil	1
Three	159	64	662
Four	53	14	1955
Five	33	33	1575
Six	11	15	1878
Total	380	157	6219

Report to the Housing Scrutiny Panel

SCRUTINY



Date of meeting: 24 July 2012

Portfolio: Housing – Councillor D Stallan

Subject: Ethnic Monitoring

Officer contact for further information: Roger Wilson extension 4419

Committee Secretary: Mark Jenkins extension 4607

Recommendations/Decisions Required:

That no recommendations be made concerning amendments to the Council’s Housing Allocations Scheme due to ethnicity as current figures do not show a significant disparity between the ethnicity of applicants on the Housing Register, and those allocated both general needs and sheltered accommodation through the Housing Register.

Report:

1. The Council has a Policy Statement for Equal Opportunities in the Provision of Housing Services. The Policy Statement includes a requirement for an annual review of the ethnicity of applicants on the Housing Register, compared with the ethnicity of those allocated accommodation.

2. When undertaking a Customer Impact Assessment of Older Peoples’ Housing Services it was identified that the ethnicity of applicants on the Housing Register awaiting sheltered accommodation compared to those allocated sheltered accommodation should be monitored separately and is therefore included in this report.

3. The reason for the review is to identify whether or not there are any indications to suggest the Council may be discriminating against any one ethnic group. The review is undertaken by the Housing Scrutiny Panel, in consultation with the Tenants and Leaseholder’s Federation.

4. The breakdown of the ethnic origin of applicants on the Housing Register for both 2010/2011 and 2011/2012 is set out in the following table.

Ethnic Group	2010/11	2011/12
White British/Irish	3,956 (77.3%)	4,578 (74.95%)
Bangladeshi/Pakistani/Indian	42 (0.8%)	49 (0.8%)
African/Caribbean	167 (3.3%)	227 (3.72%)
Mixed Race	62 (1.2%)	79 (1.29%)

Other	254 (5%)	370 (6.06%)
Not Stated	637 (12.4%)	805 (13.18%)

5. The breakdown of the ethnic origin of all Housing Register applicants allocated Council accommodation in 2010/2011 and 2011/2012 is set out in the following table:

Ethnic Group	2010/11	2011/2012
White British/Irish	290 (81.2%)	274 (77.6%)
Bangladeshi/Pakistani/Indian	0	2 (0.6%)
African/Caribbean	8 (2.2%)	10 (2.8%)
Mixed Race	8 (2.2%)	4 (1.1%)
Other	13 (3.6%)	12 (3.4%)
Not Stated	38 (10.6%)	51 (14.5%)

6. Generally, the statistics confirm that the ethnicity of applicants allocated accommodation is similar to those of different ethnic groups on the Housing Register.

7. The following table shows the breakdown of the ethnic origin of applicants on the Housing Register awaiting sheltered accommodation in both 2010/2011 and 2011/12.

Ethnic Group	2010/11	2011/12
White British/Irish	460 (83%)	334 (83.3%)
Bangladeshi/Pakistani/Indian	0	0
African/Caribbean	3 (0.5%)	2 (0.5%)
Mixed Race	0	0
Other	8 (1.5%)	8 (2.0%)

Not Stated	83 (15%)	57 (14.2%)
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8. The breakdown of the ethnic origin of Housing Register applicants allocated sheltered accommodation during both 2010/2011 and 2011/12 is set out in the following table:

Ethnic Group	2010/11	2011/12
White British/Irish	96 (82.7%)	55 (80.9%)
Bangladeshi/Pakistani/Indian	0	0
African/Caribbean	0	0
Mixed Race	0	0
Other	4 (3.5%)	0
Not Stated	16 (13.8%)	13 (19.1%)

9. When comparing the ethnic breakdown, there appears to be no significant disparity between the ethnicity of applicants awaiting sheltered accommodation in the District and those allocated sheltered accommodation.

10. The breakdown of the ethnicity of the population of the District is set out in the table below for information (source EFDC Census 2001):

Ethnic Group	Percentage (%)
White British/Irish	92.41
Bangladeshi/Pakistani/Indian	2.14
African/Caribbean	0.78
Mixed Race	1.04
Other	3.63

11. The Panel are asked to note that, following the 2011 National Census, an updated breakdown of the ethnicity of the population of the District will be available and reported next year.

Statement in support of recommended action:

12. Although a large number of housing applicants do not disclose their ethnicity, it is evident from the analyses shown in the report that the ethnic make up of the Housing Register mirrors the allocation of vacancies sufficiently for the Council to be confident that its Allocations Scheme does not racially discriminate, either directly or indirectly. Therefore, no adjustments to the Allocations Scheme are recommended.

Consultation undertaken:

12. The Tenants and Leaseholders Federation will be updated on the report at their next meeting.

Resource implications:

Budget provision: None

Personnel: None

Land: None

Community Plan/BVPP reference: Social inclusion

Relevant statutory powers: Housing Act 1996, as amended

Background papers: Customer Impact Assessment, Housing Service Strategy on Equality and Diversity & the Code of Practice in Rented Housing.

Environmental/Human Rights Act/Crime and Disorder Act Implications: N/A

Key Decision reference: (if required) N/A

Report to Housing Scrutiny Panel

Date of meeting: 24 July 2012

Portfolio: Housing – Councillor D Stallan

Subject: Council response to CLG Consultation Paper – “High Income Social Tenants Pay to Stay”

**Officer contact for further information:
Roger Wilson ext 4419**

**Committee Secretary:
Mark Jenkins ext 4607**



Recommendations/Decisions Required:

(1) That the DCLG Consultation Paper “High Income Social Tenants Pay to Stay”, which is attached at Appendix 1 to the report be noted;

(2) That consideration be given to the proposed Council response to the Consultation Paper attached at Appendix 2; and

(3) That the Scrutiny Panel considers whether any different or additional comments should be included within the Council’s response.

Report:

1. In June of this year, the Department for Communities and Local Government (DCLG) issued a consultation paper entitled “High Income Social Tenants Pay to Stay”. The Consultation Paper is attached at Appendix 1 to the report. The closing date for responses is 12 September 2012.

2. A proposed response by the Council to each of the questions asked within the Consultation Paper is set out at Appendix 2 to the report, apart from Question 14 which will require some discussion at the meeting.

3. The Scrutiny Panel is invited to consider the proposed Council response and whether any different or additional comments should be included.

Reason for decision:

4. Responding to the Government’s Consultation Paper is an opportunity for the Council to influence and comment on the future guidance and any new arrangements for charging higher rents to tenants on high incomes who want to stay in their social homes.

Options considered and rejected:

5. Not to respond to the Government’s Consultation Paper, or to provide different comments.

Consultation undertaken:

6. The Tenants and Leaseholders Federation will be consulted on the Council’s agreed response at their meeting on 22 August 2012 and will be invited to submit its own views to

the CLG directly.

APPENDIX TWO

Consultation Questions	Proposed Response
<p>1. Do you agree with the principle that very high earners living in social housing should pay higher (rents) than social housing tenants?</p>	<p>Yes, provided that income thresholds are set to ensure that residents have a reasonable expendable income and bureaucracy is kept to a minimum. However, we have concerns that in order to make it fair and reasonable it would have to be bureaucratic. Furthermore, the costs of administering the scheme could be higher than the additional income received.</p>
<p>2. Do you agree that this approach would be the best way of delivering additional flexibility for local authorities and private registered providers?</p>	<p>No. However, this could be a driver to bring Local Authority and Housing Association rent setting under one regime.</p>
<p>3. What are your views on the guidance at Annex A?</p>	<p>(a) There should be a mechanism to take account of other earners living in larger households.</p> <p>(b) Income thresholds should be based upon property size. For example, the impact on those in 3 bedroom properties with children will be far different to those in 1 bedroom properties without children.</p> <p>(c) Income thresholds should be increased annually as rents increase, otherwise this could affect the expendable income of residents</p>
<p>4. Do you think that landlords should be required to charge high income households a higher rent?</p>	<p>Yes. This is in order to ensure consistency but provided it is fair, workable and as already stated, bureaucracy is kept to a minimum. There should be different thresholds for different areas of the country. We have concerns about having absolute income thresholds, which could mean that residents would have reduced incentive or ambition to increase their earnings by either accepting workplace promotions or seeking higher paid jobs. With absolute thresholds, a person's expendable income could reduce dramatically following a small increase in earnings. Importantly, should the proposals be introduced, then income disclosure arrangements, referred to later, must be put in place in advance.</p>

Consultation Questions	Proposed Response
5. Do you consider that £60,000 £80,000 or £100,000 would be an appropriate threshold, avoiding the impacts referred to above?	Income thresholds should be different depending upon area in the country. It is the Council's view that it is difficult to set any income threshold as this would be dependent upon circumstances, including family size and location. If these amounts were the only option put forward, then it is suggested that the income threshold should be no less than £60,000.
6. Could levels below £60,000 be considered without disadvantaging other households on low incomes or the vulnerable? Where should the line be drawn?	An income threshold under £60,000 could be set in some cases but dependent upon the circumstances. For example, it could be argued that two persons on a joint income of £55,000 living in a one bedroom property could afford to pay a higher rent.
7. At what level do you think the income threshold could start impacting on welfare or affecting work incentives?	Too early to comment on the implications of Welfare Reforms on any income threshold. As referred to above, any absolute income threshold will affect work incentives, due to the financial impact of just tipping over the threshold.
8. Should the policy apply only to those whose names are on the tenancy agreement?	No. This could make the scheme open to abuse as higher earners could avoid being included on the tenancy, with the lowest earners being the sole tenants. This would be a bad way to determine the true income of the highest earners in any household.
9. Should income other than pay be included in the threshold amount, such as Lottery windfalls or inheritance?	Yes. All income, assets and savings should be taken into account.
10. Should certain groups be exempted from higher rents, such as disabled people, or pensioners? If so, please set out your reasoning.	No. Like Housing Benefit, the proposal is based upon the ability to pay regardless of their circumstances. Such groups are not exempt from Housing Benefit rules.
11. Do you agree that landlords should be able to charge 80% of market rates to high income households which meet the proposed criteria, that is an individual or two individuals with a high joint income?	Addressed earlier.

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Consultation Questions	Proposed Response
12. Would allowing landlords to charge full market rents be appropriate in your area in your view?	Only if income thresholds are raised to an appropriate level.
13. Are there any particular barriers to charging full market rents?	No, provided the income thresholds are reasonable, and income data is available.
14. If the power to charge a higher rent was optional for landlords would you be likely to make use of it?	[Member discussion]
15. Your views are invited on how we could best enable landlords to set higher rents to high income households in advance of any legislation.	It is crucial that landlords have access to income data prior to any scheme being introduced. This could be achieved through landlords being given authority to access basic HMRC records on income.
16. We would also welcome your views on the practicalities of requiring income disclosure; and specifically what kind of mechanism would be needed and how this would best work?	As above
17. Do you already hold or have access to information about tenants' income levels that could be used to support a "pay to stay" approach?	No. The only income data available is that submitted in support of Housing Benefit claims. However, this information is not currently made readily available to housing staff even within local authorities due to data protection issues.
18. Would you be likely to make use of any new statutory powers to require tenants to disclose their income?	Yes, this would be essential.
19. Should the income year be the tax year, the calendar year or a rolling year? Do you see difficulties with adjusting a tenant's rent based on a previous year?	The income year should be a rolling year as this will assist with spreading the workload. Rent should be adjusted when a tenant's income changes to above or below the income threshold (on the application of the

	tenant).
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Consultation Questions	Proposed Response
20. What practical issues do you see in charging existing high income tenants a higher rent?	Responses to other questions covers this point.
21. How quickly could local authority and housing association rent processes respond to changed tenant circumstances? What issues might arise? For instance would there be a need to seek regular updates from tenants on their circumstances? Would this just be in relation to known high income social tenants, or all tenants?	Annual reviews of all tenants would be needed on a rolling basis. Tenants should be required to request a review during the year their income changes, when they either go above or below the income threshold. They may be unlikely to seek a review if it goes above which would, if discovered by the landlord, constitute a social housing fraud offence with the rent increase being back-dated.
22. Is an internal appeal or complaint process the best way of allowing tenants to appeal against decisions to put them onto a higher rent? Are there existing appeal or complaint mechanisms within your structures that could be adapted for this purpose?	For the scheme to work the rules must be absolutely clear, which would remove the need and basis for any appeals. Should tenants be allowed to appeal, providers could be inundated.
23. Should there be a uniform set of rules across the social housing sector on how any appeals should be handled? If so, who should make these rules?	Yes, this is considered essential, with the rules being made by the DCLG.
24. What is your view on the administrative costs that might be incurred in implementing these proposals? What opportunities do you see for minimising additional costs?	The costs could be significant and should not be underestimated. Costs could be minimised by allowing access to basic HMRC income data.
25. Do you have any comments about the regulatory implications of giving private registered providers these additional flexibilities?	No
26. How should additional income generated from this policy be used?	The first call on the additional income should be to fund the cost of additional staff that will be required to administer the scheme. Any

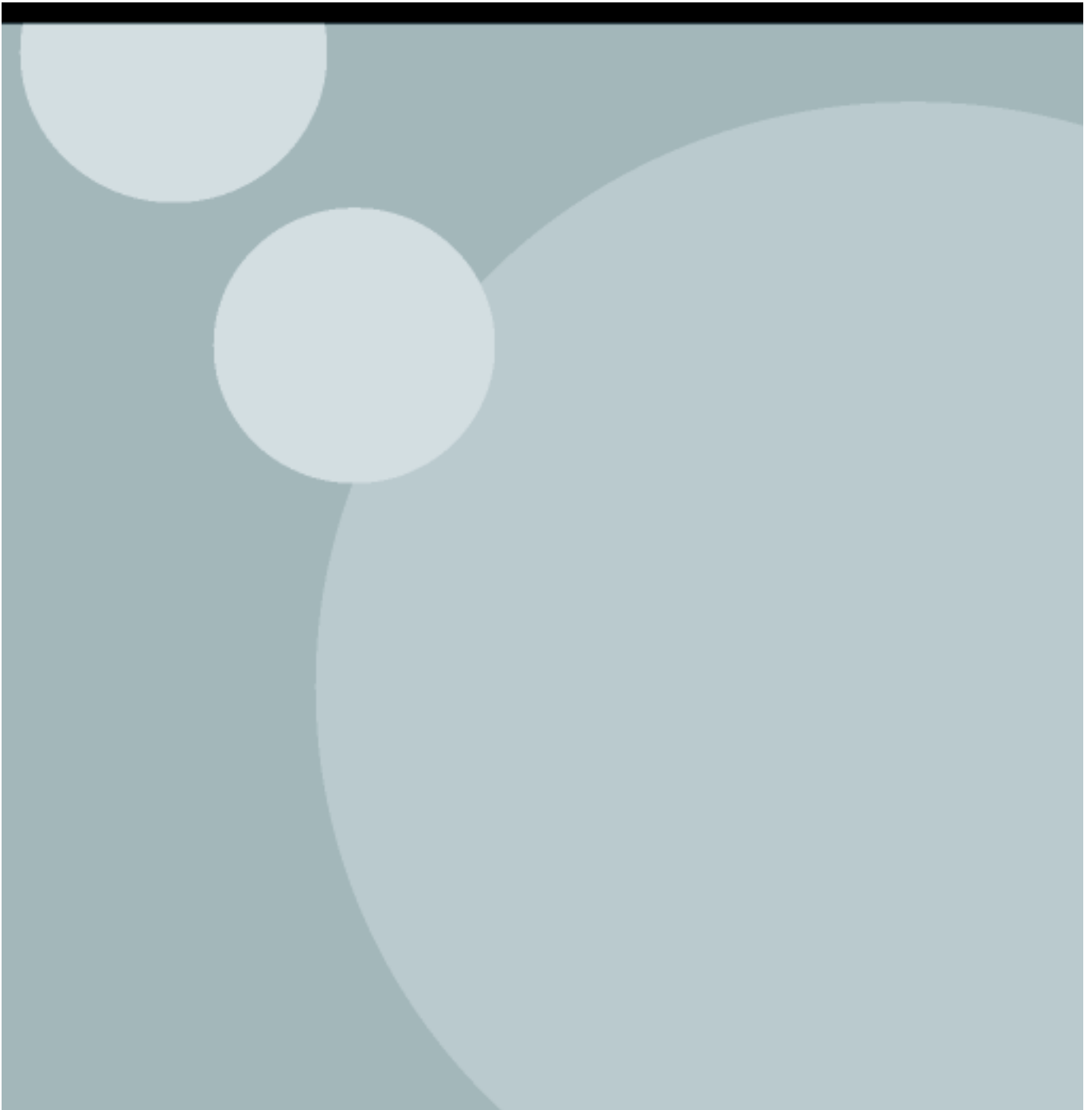
	surplus should be used for other housing services or to improve the stock.
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Consultation Questions	Proposed Response
27. What are the practical implications of requiring grant reinvestment/recovery when a property moves to a higher rent (or reverts back to a social rent)?	Repayment of grant would be appropriate, but it should be noted that any tenant could sink below the income threshold thereafter, and pay a lower rent. This would cause financial problems for providers. Perhaps a national fund should be set aside to fund such circumstances
28. Are there any other issues you wish to raise?	No. All of our comments/issues are raised above.



High Income Social Tenants

Pay to Stay Consultation paper





High Income Social Tenants

Pay to Stay Consultation paper

June 2012
Department for Communities and Local Government

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Introduction

1. In times of economic hardship it is more important than ever that social housing helps the most vulnerable in society. In November, the Prime Minister and the Deputy Prime Minister launched our radical new strategy for housing, *Laying the Foundations: A Housing Strategy for England*¹. This includes major reforms to social housing that will give landlords far greater freedom to target their resources at those who need it for as long as they need it. In particular, our tenure reforms will allow social landlords to offer lifetime security where it is needed but also to set shorter terms for new tenants where that makes more sense. And reforms to social housing allocations will give councils the freedom to manage their own waiting list and allow them to give more priority to long-standing local residents.
2. In addition, our new statutory guidance on social housing allocations will make clear that we expect councils to avoid providing social housing to people who already own a property. We are also changing the law to ensure that former service men and women with urgent housing needs receive high priority on waiting lists, and to ensure that those who move from base to base do not lose their qualification rights.
3. However these reforms will not fully address the problem of precious social housing resources being occupied by high income households. The Government is committed to take action to tackle this problem and give social landlords the tools to target support at those who need it. Following on from the commitment made in the Housing Strategy² to tackle the problem of households earning high incomes who continue to occupy subsidised housing, we now propose to introduce a 'Pay to Stay' scheme whereby landlords could charge higher rents to tenants on high incomes who want to stay in their social homes.
4. This is an issue of principle and fairness. The Government believes that it is right that landlords should be able to require high income social households to pay a higher rent. This consultation invites views on how this policy could be delivered. The Government plans to bring forward more detailed proposals following this consultation.

¹ <http://www.communities.gov.uk/documents/housing/pdf/2033676.pdf>

² 'Laying the Foundations, A Housing Strategy for England' p29, November 2011

The consultation process and how to respond

Topic of this consultation:	This consultation invites views on the proposal that social landlords should be able to require tenants in social rented housing on high incomes to pay higher rents.
Scope of this consultation:	The consultation invites views on how this proposal might be delivered. Specific delivery issues include: <ul style="list-style-type: none"> • The income threshold above which high income tenants might be asked to pay a higher rent • What the higher level of rent should be • Disclosure of income by tenants • Whether the policy should be voluntary or compulsory for social landlords
Geographical scope:	England.

Basic information

To:	This consultation is aimed primarily at local authorities, registered providers of social housing, tenants and representative organisations. The Department will of course consider any consultation responses received from other interested bodies and individuals.
Body/bodies responsible for the consultation:	The Housing Growth and Affordable Housing Directorate in the Department for Communities and Local Government is responsible for this consultation.
Duration:	The consultation starts on 13 June 2012 and finishes on 12 September 2012.
Enquiries:	For further information on this consultation document please email [paytostay@communities.gsi.gov.uk] or telephone 0303 444 3724.
How to respond:	Consultation responses should be submitted by email to: [paytostay@communities.gsi.gov.uk] Or by post to: Pay to Stay Consultation Department for Communities and Local Government [Zone 1/D1]

	Eland House Bressenden Place London SW1E 5DU
After the consultation:	The Department for Communities and Local Government will publish a summary of the responses to the consultation.
Compliance with the code of practice on consultation:	This consultation document and consultation process have been planned to adhere to the Government code of practice on consultation. The period of consultation will be 12 weeks.

The case for reform

5. It is estimated that in social rented housing in England there are between 1,000 and 6,000 households where the Household Reference Person and partner have a combined income over £100,000 per annum; and 12,000 to 34,000 earning £60,000 or more.

Income threshold	% of top earners ³	Estimate of number of households	
		Low	High
£100,000	5%	1000	6000
£80,000	5%	2000	11000
£60,000	10%	12000	34000

6. Figures suggest that on average across England the economic subsidy provided by sub-market rents on social housing is worth an estimated £3,600 per annum. These subsidies are significant and the Government is concerned that they are unfair when provided to those on high incomes, both to taxpayers and to those in housing need on waiting lists. Social housing should go to those who genuinely need and deserve it the most. The Government believes that there is no case for very high earners to be benefiting from significant annual housing subsidies, even taking account of the case in favour of a mix of incomes in social housing. As the table above shows, our proposals target only the very richest, so any reduction in income mix is likely to be very minor. In a comparable move, the Government has already taken action to restore fairness by limiting Housing Benefit so that claimants are faced with the same types of housing choices as ordinary working families. This consultation considers options for tackling the situation so that tenants earning high incomes can be asked to pay more to stay in their homes.

Question 1: *Do you agree with the principle that very high earners living in social housing should pay higher than social rents?*

Delivering reform

7. The Government has taken forward a package of social housing reforms to provide greater freedom for social landlords to target support at those who most need it. In common with this approach, and with regard to rents, we therefore wish to focus on options that enable landlords to charge a higher rent to high-income households, by which we mean a single tenant earning at or above the agreed threshold or the two highest earning individuals whose joint income is at or above that threshold.

³ http://www.hmrc.gov.uk/stats/income_distribution/3-1table-feb2012.pdf

8. While we wish to formulate a common policy for all social housing, the differing nature of the local authority and housing association sectors will necessitate some differences in approach.
9. For **local authorities**, central Government's current social rent policy establishes local authority rent increases according to a formula linked to the property rather than to the individual tenant's income. The Government's rental policy statements have the status of non-statutory guidance. Authorities have the flexibility to set rents at another level, or using another basis, if that appears to them more appropriate to local circumstances.
10. Nevertheless, many local authorities follow rent policy. To bring this new policy into effect, we would therefore issue supplementary guidance, setting out a framework for local authorities to charge certain Higher Income Social Tenants a higher rent. We would also revise published policy statements on rents in the local authority sector to include this change. (A draft illustration of a revised statement of local authority social rent policy is at [Annex A](#).) This approach would allow councils to choose to implement the policy according to local circumstances. Subject to feedback on this consultation, we propose to issue the supplementary guidance as soon as possible after the end of the consultation period. This would immediately give local authorities more support if they wanted to increase rents for high-income households.
11. **Private registered providers of social housing** are subject to regulatory controls on the level of rent they may charge and maximum annual rent increases. In order to allow housing associations to charge higher rents to high income households which meet the criteria specified above, the Secretary of State would need to direct the Social Housing Regulator to amend its standard on rent. The Secretary of State's direction and the resulting standard would be subject to statutory consultation. The detail of how this will work is more complex, and we are seeking your views on these issues in the section below.

Question 2: *Do you agree that this approach would be the best way of delivering additional flexibility for local authorities and private registered providers?*

Question 3: *What are your views on the guidance at Annex A?*

Question 4: *Do you think that landlords should be required to charge high income households a higher rent?*

12. There are a range of practical and, potentially, legal barriers that would need to be overcome in order to implement the Government's final proposals. These include decisions on the income threshold, the need for landlords to know about the income of the tenant, the level of rent that should be charged and the impact of income changes.

13. The key issues are set out below and your views are invited on them.

The income threshold

14. In setting the income threshold, the Government wants to strike the right balance without penalising aspiration or creating work disincentives. However, as has been shown in the debate around Welfare Reform, people believe it is wrong for hard working taxpayers to subsidise those who are easily able to support themselves. That is why we believe it is fair to seek views on possible options for an income threshold, and wish to hear views on the potential to set the threshold at £60,000, £80,000 or £100,000.
15. We consider that it is most likely that £80,000 or £100,000 would be the level which would best avoid perverse incentives. However, we believe there could also be a case for setting the threshold at £60,000, which would do more to achieve our aims in terms of fairness and is in line with the current maximum household income of £60,000 (or £74,000 in London) for access to Government funded affordable home ownership schemes, such as First Buy, in most parts of the country. Setting the threshold at £60,000 would therefore be consistent with the level below which people trying to get onto the housing ladder would be eligible to receive Government support to access housing.
16. We also invite comments on whether there is a case for setting the threshold below £60,000. The proposed policy could create disincentives to work, if people reduce hours worked in order to fall under a threshold, and thus avoid the higher rent levels we propose. There is increased risk the lower the threshold particularly where two tenants' incomes are taken account of.
17. Any incentive to reduce work, together with increased rents, could lead to higher benefit costs. The Government's policy is to maintain downward pressure on the welfare bill. We are keen, therefore, in setting the threshold to find a balance so the tipping point is not reached where avoiding triggering the threshold becomes a significant consideration.
18. While we remain open to views about whether there is a sound case for lowering the income threshold below £60,000, low income tenants are excluded from these proposals and the Government is committed to protecting the rents of those on low incomes and the vulnerable.

Question 5: *Do you consider that £60,000, £80,000 or £100,000 would be an appropriate threshold, avoiding the impacts referred to above?*

Question 6: *Could levels below £60,000 be considered without disadvantaging other households on low incomes or the vulnerable? Where should the line be drawn?*

Question 7: *At what level do you think the income threshold could start impacting on welfare or affecting work incentives?*

Question 8: *Should the policy apply only to those whose names are on the tenancy agreement?*

Question 9: *Should income other than pay be included in the threshold amount, such as Lottery windfalls or inheritances?*

Question 10: *Should certain groups be exempted from higher rents, such as disabled people, or pensioners? If so, please set out your reasoning.*

How high should rents for high income social tenants be set?

19. There is a very strong case to allow rents to be increased to full market rents for high income households. However, in the housing association sector, it may be problematic to immediately introduce market rents in view of the charitable status and objectives of providers; although, equally, charitable providers have a clear interest in avoiding giving support to those who do not need it. In this context we propose to look at these issues further and to encourage landlords to increase rents to 80% of market rents in the interim, with the aim of introducing full market rents for higher income tenants as soon as possible.

Question 11: *Do you agree that landlords should be able to charge 80% of market rates to high income households which meet the proposed criteria, that is an individual or two individuals with a high joint income?*

Question 12: *Would allowing landlords to charge full market rents be appropriate in your area in your view?*

Question 13: *Are there any practical barriers to charging full market rents?*

Question 14: *If the power to charge a higher rent was optional for landlords, would you be likely to make use of it?*

Disclosure of income

20. Social sector landlords currently have no powers to require tenants to disclose income for the purpose of setting their rents.
21. Linking rents to income would be breaking new ground. Our present view is that primary legislation will be required to enable landlords to access tenant income data if this policy is to be fully effective.
22. We intend to explore what such legislation might look like, with the aim of introducing it at a suitable opportunity. In the interim, we intend to

explore how we could support landlords by providing them with greater flexibility to charge higher rents to high income households; for example, through supplementary guidance for local authority landlords.

23. We also intend to fully explore timing issues including the “income” year to which the new rent should be applied. There may be arguments for introducing the higher rent based on either the previous year’s income, or the forthcoming year. Your views are invited on the period to which the new rent should apply.

Question 15: *Your views are invited on how we could best enable landlords to set higher rents to high income households in advance of any legislation.*

Question 16: *We would also welcome your views on the practicalities of requiring income disclosure; and specifically, what kind of mechanism would be needed and how this would best work.*

Question 17: *Do you already hold or have access to information about tenants’ income levels that could be used to support a “pay to stay” approach?*

Question 18: *Would you be likely to make use of any new statutory powers to require tenants to disclose their income?*

Question 19: *Should the income year be the tax year, the calendar year or a rolling year? Do you see difficulties with adjusting a tenant’s rent based on a previous year?*

Applying the policy to existing and new tenants

24. Existing local authority tenants are largely secure tenants under the Housing Act 1985, whose terms and conditions of tenure are set out in their tenancy agreements, which would have been agreed prior to the introduction of the policy proposed here. Local authority landlords are able to renegotiate tenancy agreements and they generally set rent levels each year, but not generally in relation to tenants' incomes. Existing social tenants will have legitimate expectations of existing arrangements continuing, and would need to be given adequate notice of any proposed changes in rent levels. The high incomes of the affected tenants and their corresponding capacity to make alternative arrangements if needed would clearly be a major factor in determining the amount of notice that would be sufficient in particular cases.
25. The vast majority of tenants of private registered providers have assured tenancies under the Housing Act 1988. Usually rent increases are a matter for the terms of the tenancy. Such tenancies will often give landlords discretion to vary rents, subject to giving tenants adequate notice. However, if rent provisions in tenancies make promises as to the level of future increases, private registered providers would have to renegotiate those tenancies in order to charge existing tenants a higher

rent.

26. The position for new tenants should be more straightforward. There are reforms in the Localism Act to provide that local choice for social landlords and new tenancies moving forward. For new tenants with fixed term tenancies it may be possible at review time for agreement to be reached on a different level of rent suited to the tenant's circumstances. It may also be easier to make further adjustments where those circumstances changed.

Question 20: *What practical issues do you see in charging existing high income tenants a higher rent?*

Moves and income changes

27. A new system would need to be sufficiently sensitive to respond to changed circumstances quickly, for instance where a tenant's income was abruptly reduced due to a redundancy, a failed business, or where the tenant moved out; or conversely where a new partner moved in and income significantly increased.

Question 21: *How quickly could local authority and housing association rent processes respond to changed tenant circumstances? What issues might arise? For instance would there be a need to seek regular updates from tenants on their circumstances? Would this just be in relation to known high income social tenants, or all tenants?*

Tenant protections

28. Landlords may need to have a review/appeal mechanism so that tenants can challenge decisions to put them onto a higher rent. This would not need to be a statutory procedure, but could be introduced as an internal arrangement for each social landlord. We envisage that landlords will be able to make use of their existing internal and external complaint procedures for this purpose.

Question 22: *Is an internal appeal or complaint process the best way of allowing tenants to appeal against decisions to put them onto a higher rent? Are there existing appeal or complaint mechanisms within your structures that could be adapted for this purpose?*

Question 23: *Should there be a uniform set of rules across the social housing sector on how any appeals should be handled? If so, who should make these rules?*

Administrative implications and costs

29. Charging rents for some tenants on a different basis than the majority could create additional administrative work for the landlord, such as

collecting information on incomes, and assessing tenants to adjust rents where their circumstances change. However, the new policy also provides the opportunity for additional income generation and for ensuring that the valuable housing stock is being used effectively.

30. As noted above, the maximum amount by which private registered providers can raise social rents is controlled by regulation. We could amend these controls, via a direction to the Social Housing Regulator, in order to give providers the option to charge higher rents to high income households. This change could create additional costs for the Regulator. It would be up to the Regulator to decide how to monitor landlords' decisions to charge higher rents and how to monitor and enforce compliance with the amended regulatory standard.

Question 24: *What is your view of the administrative costs that might be incurred in implementing these proposals? What opportunities do you see for minimising additional costs?*

Question 25: *Do you have any comments about the regulatory implications of giving private registered providers these additional flexibilities?*

Use of increased rental income

31. Increasing rents for high income social tenants would lead to additional income for landlords. The extent of this additional income would depend on the income threshold, definition of income and to what level rents were increased. We welcome views on how the additional income generated should be used.

Question 26: *How should additional income generated by this policy be used?*

Treatment of historic grant

32. Where a provider converts a grant-funded social rent property to a higher rent, some or all of the grant might need to be recovered by the Homes and Communities Agency or reinvested by the provider in new affordable housing supply. There are already mechanisms in place to ensure that developing providers will reinvest the grant in providing new affordable housing, but non-developers may need to pay grant back to the Homes and Communities Agency. This could become more complicated if the property subsequently reverts back to social rent (e.g. if the high income household moves on or its circumstances change).

Question 27: *What are the practical implications of requiring grant reinvestment / recovery when a property moves to a higher rent (or reverts back to social rent)?*

Other issues

Question 28: *Are there any other issues you wish to raise?*

Annex A: Draft Supplementary Guidance to Local Authorities in Setting Their Social Rents

Charging a Reasonable Rent for High Income Social Tenants

This guidance supplements the social rent policy statement issued in December 2000, which set out the rent restructuring policy, and approach for social rents. This guidance should be read alongside the existing guidance.

The Government believes that it is right in principle that landlords should be able to charge high-income households a higher rent to stay in their social homes. The consultation paper 'High Income Social Tenants: Pay to Stay' set out our intention to give councils and housing associations new powers to charge social tenants a higher rent where the household income of a sole occupier, or the two highest earning individuals whose joint income is at or above a threshold of [figure to be determined. See 'Income Threshold' section of consultation document]. We are committed to helping social landlords take action to tackle the problem of scarce social housing resources being occupied by high-income households by giving them the tools to charge a 'Pay to Stay' rent.

Local authorities have existing statutory powers, under section 24 of the Housing Act 1985, to charge reasonable rents. Each local authority would need to consider whether charging a high income-earning tenant a higher rent was appropriate, but the Government considers the existing statutory powers should allow for Higher Income Social Tenants rents.

The limits we would expect to see applied to Higher Income Social Tenants Rents would be full market rent, with an increase in rent to 80% of market rents in the interim, plus annual increases of no more than the level of Retail Price Index (RPI) inflation plus 0.5%. However, the Government is proposing to move to enable these rents to be set at market rates as soon as possible.

At present there is no requirement for tenants to disclose their incomes to their social landlords. We have said we may consider bringing in primary legislation in due course to make income disclosure a requirement.

Authorities should consider whether in local circumstances they want to use this new flexibility to charge tenants in the high income category a higher rent.

Under this policy the key elements are:-

- The new rents should apply to tenants with incomes of [figure to be determined. See 'Income threshold' section of consultation document];

- The policy applies to an individual tenant earning [figure to be determined. See 'Income Threshold' section of consultation document], or the two highest earners in the household with a joint income of [figure to be determined. See 'Income Threshold' section of consultation document];
- Tenants on low incomes should continue to be protected from unreasonable rent increases;
- For now the rent increase should be a maximum of 80% of local market rates, but with full market rents for high earning social tenants as soon as possible.

Where a tenant ceases to be subject to a Higher Income Social Tenant rent, and remains in the property, we would expect that tenant to revert to the social rent that would have been charged on the property if a Higher Income Social Tenant rent had not been applied.

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Report to Housing Scrutiny Panel

Date of meeting: 24th July 2012

Portfolio: Housing – Cllr D. Stallan

**Subject: Housing Performance Indicators
(Tenant-Selected and KPIs)
Out-turn – 2011/12**



Officer contact for further information:

Alan Hall – Director of Housing (01992 564004)

Committee Secretary: Mark Jenkins (01992 56 4607)

Recommendations/Decisions Required:

That the Council's performance in 2011/12 in relation to the Housing Performance Indicators, comprising all the Tenant-Selected Indicators (TSIs) and Key Performance Indicators (KPIs), be noted.

Report:

1. The Council has adopted a number of Key Performance Indicators (KPIs), which include 9 KPIs relating to the Housing Service. Performance against all of the Council's KPIs are monitored on a quarterly basis by the Finance and Performance Management Scrutiny Panel.
2. In addition, the Tenants and Leaseholders Federation has selected 21 "Tenant-Selected Indicators", as being areas of performance considered particularly important to tenants, which the Tenants and Leaseholders Federation monitor on a quarterly basis, and are reported to all tenants in the Annual Report to Tenants.
3. Consideration of the Council's performance in relation to these Housing Performance Indicators is included within the Scrutiny Panel's Work Programme.
4. The Out-turn Report for these Housing Performance Indicators in 2011/12 is attached as an Appendix, which includes:
 - The Target for 2011/12;
 - The Out-turn Performance for 2011/12; and
 - Whether or not the target has been achieved.

Housing Performance Indicators (Tenant-Selected and KPIs)				
Out-turn 2011/12				
Service	Definition	Target (2011/12)	Out-turn (2011/12)	Target Achieved ?
Tenant-Selected Indicators (Including Key Performance Indicators - KPIs)				
Careline	% of Careline calls responded to within 1 min (excl. routine calls from scheme managers & test calls)	99 %	99.7 %	√
Careline	Average (seconds) to respond to alarm calls	10 seconds	6.5 seconds	√
Rent Arrears	Rent collected as a proportion of rent owed (Also a KPI)	97 %	97.68 %	√
Estate Management	No. of estate inspections completed	93	89	X
Repairs	% of appointments kept	95 %	94 %	X
Repairs	Average time to complete urgent repairs	5 working days	4 working days	√
Repairs	Average time to complete non-urgent repairs	42 days (6 weeks)	13 days	√
Repairs	% Emergency repairs completed within target time of 24 hours (Also a KPI)	99 %	99 %	√
Repairs	% Priority repairs completed within target time of 3 working days	95 %	94 %	X
Repairs	% Urgent repairs completed within target time of 5 working days (Also a KPI)	95 %	90 %	X
Repairs	% Routine repairs completed within target time of 6 weeks (Also a KPI)	95 %	96 %	√

Repairs	% Satisfaction (good or satisfactory) with general standard of repairs (Also a KPI)	98 %	100 %	√
Repairs	Expressions of dissatisfaction: (a) Total no. (b) % of total repair requests (c) Poor satisfaction upheld	(a) 0 (b) 0 (c) 0	(a) N/A (b) N/A (c) N/A	N/A
Voids	Average overall void period (excluding difficult to let properties) (Also a KPI)	30 days	34 days	X
Adaptations (Minor)	Time taken from decision to completion of work	28 days	22.6 days	√
Adaptations (General)	Time taken from decision to completion of work	90 days	81 days	√
Gas Servicing	Tenant satisfaction: (a) % "Excellent" or "Good": (i) Gracelands (ii) Kinetics (b) % "Poor": (i) Gracelands (ii) Kinetics	(a) 96 % (b) < 5 %	(i) 98 % (ii) N/A (i) 0 % (ii) N/A	√ √
Gas Servicing	No. of CP12 (annual safety certificates) lapsed - SNAPSHOT	0	11	X
Kitchen & Bathroom Programme	Overall satisfaction	96 %	95 %	X
Decent Homes	No. of homes that are non-decent (of total housing stock) (Also a KPI)	0	0	√
Key Performance Indicators (not within TSI Set above)				
Affordable Housing	No. of affordable homes delivered	112	43	X
Homelessness	No. of households living in temporary accommodation	60	63	X

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Report to Housing Scrutiny Standing Panel

Date of meeting: 24th July 2012

Portfolio: Housing – Cllr D. Stallan

**Subject: West Essex Tenancy Strategy –
Consultation Draft**



Officer contact for further information:

Alan Hall – Director of Housing (01992 564004)

Committee Secretary: Mark Jenkins (01992 56 4607)

Recommendations Required:

That consideration be given to the Consultation Draft of the West Essex Tenancy Strategy (attached as an Appendix) and whether or not the Scrutiny Panel wishes to provide any comments as part of the Consultation Exercise.

Report:

1. At the recent Members Information Session on the housing elements of the Localism Act 2011, officers explained the Act's requirements in relation to the production of Tenancy Strategies, which every local authority must produce by January 2013.

2. Under the Act, the Tenancy Strategy must set out the District's expectations of the types of tenancies that all Registered Providers (RPs) of Housing (i.e. social landlords – councils and housing associations) in their District will provide (e.g. "lifetime" (secure / assured) tenancies or fixed term tenancies). All RPs must "have regard" to the District's Tenancy Strategy when setting their own Tenancy Policy. Since the Council has its own housing stock, it must have regard to the Tenancy Strategy itself when formulating the Council's own Tenancy Policy too.

3. The Tenancy Strategy must set out the issues that RPs in the area should consider when formulating their own Tenancy Policies, including:

- The types of tenancies to be granted;
- The circumstances when different types of a tenancy will be granted;
- The length of any fixed term tenancies; and
- When fixed term tenancies will be extended or terminated and what will be taken into account.

4. In January 2012, the former Housing Portfolio Holder agreed that the Council should work with Harlow DC and Uttlesford DC to produce a **Joint** West Essex Tenancy Strategy, under the auspices of the West Essex Housing Forum, to cover the whole of West Essex. The main benefits of this approach are that:

- There are already good joint working arrangements between the councils, covered within the West Essex Memorandum of Understanding;

- There are similar issues for each Council; and
- Costs and officer time are shared.

5. As a result, following the production of a Consultant's Brief by EFDC's Director of Housing and a subsequent competitive tender exercise, the three local authorities have appointed a small consultancy - Jenkinsduval - to produce a draft West Essex Tenancy Strategy on their behalf.

6. One of the requirements of the Localism Act 2011 is that local authorities must consult with all RPs in their area – and take account of their views - before publication. Accordingly, Jenkinsduval held a successful Consultation Event with all social landlords across West Essex on 19th June 2012. On the same day, it also held a separate (equally successful) Consultation Event with key stakeholders from across West Essex (CAB, homelessness groups, advice agencies etc).

7. Following these events, Jenkinsduval - working closely with officers from the three local authorities - has now produced a Consultation Draft of the proposed West Essex Tenancy Strategy, which is attached as an Appendix to this report.

8. As can be seen, the Consultation Draft:

- Is not too prescriptive – providing a broad, over-arching approach
- Enables local flexibility in the three local areas, and amongst different RPs – recognising that different landlords and local authorities may want to do different things
- Enables social landlords to either provide fixed term tenancies or “lifetime” (secure / assured) tenancies as appropriate
- Expects minimum 5 years terms if fixed term tenancies are provided
- Sets out the expectations of the criteria to be used for reviews and renewals of tenancies
- Emphasises the importance of good timely advice at the review period

9. Jenkinsduval is now currently undertaking a formal Consultation Exercise on the Consultation Draft. At the end of the consultation period, a final draft will be produced for adoption by each local authority's Cabinet.

10. The Scrutiny Panel is asked to consider the Consultation Draft and whether or not it wishes to provide any comments as part of the Consultation Exercise. The Tenants and Leaseholders Federation will be considering the Consultation Draft at its meeting on 19th July 2012, and whether or not it wishes to make any comments.

11. With regard to the Council's own Tenancy Policy (as explained at the recent Members Information Session), following initial informal discussion amongst Cabinet members, the Housing Portfolio Holder will be making a Portfolio Decision on the key principles that should be adopted for the Tenancy Policy. Based on these key principles, officers will then produce a detailed Draft Tenancy Policy, which will be considered in detail by the Housing Scrutiny Panel. The Scrutiny Panel will then be asked to recommend a final version of the Tenancy Policy to the Cabinet for adoption.



West Essex Tenancy Strategy Consultation Draft

1. Introduction

The West Essex Housing Forum comprises Epping Forest, Harlow and Uttlesford District Councils, whose Leaders of Council have signed a Memorandum of Understanding relating to the way that they will work together. The Memorandum of Understanding states that, whilst each Council has its own sovereignty and characteristics, they are committed to working together to promote the interests of West Essex and to improve their organisational economy, efficiency and effectiveness.

This includes the need to work together to develop strategic responses to pan-West Essex, sub-regional and national issues. It also includes a commitment to always giving consideration to the West Essex Forum's approach to the influencing, commissioning and delivery of services for the benefit of the communities they serve, wherever it would facilitate best practice, best outcomes and best value.

The Localism Act 2011 requires local authorities to publish a Tenancy Strategy which, within 12 months of commencement of the Act being January 2013, must set out the matters to which registered providers are to have regard in formulating their policies relating to:

- The kinds of tenancies they grant;
- The circumstances in which they will grant a tenancy of a particular kind;
- Where they grant tenancies for a term certain, the lengths of those terms; and
- The circumstances in which they will grant a further tenancy on the coming to an end of an existing tenancy.

In view of the West Essex Housing Forum's Memorandum of Understanding, the Forum agreed to seek to develop and adopt one Tenancy Strategy that covers the three local authorities in West Essex. All Registered Providers (RPs) with housing stock in West Essex are expected to have regard to the West Essex Tenancy Strategy and local authorities' individual allocations schemes when formulating and implementing their own Tenancy Policies. This includes the three local authorities themselves, all of whom have retained their housing stock.

The Government is enabling providers of social housing with the option to use flexible tenancies also known as fixed term tenancies, which in most cases will be for a minimum period of 5 years. This recognises that currently in some cases, tenancies granted by local authorities or Private Registered Providers are provided to meet an immediate need, such as overcrowding or homelessness, which may change in the future resulting in homes becoming under-occupied or being occupied by tenants who could afford to buy a home or rent privately. The use of flexible tenancies could help meet an immediate need, but not necessarily provide a tenancy for life.

This Tenancy Strategy meets the statutory requirement of the Localism Act 2011 for the three local authorities in West Essex to produce a Tenancy Strategy.

2. Aims & Objectives

Aims

This Tenancy Strategy has been produced to give guidance to Registered Providers on the Councils' expectations of their own tenancy policies. Each Council will also produce its own tenancy policy and will make its own decision on whether it lets its own tenancies on a fixed term.

Councils understand that some Registered Providers wish to use fixed term tenancies.

Under the Localism Act 2011, Registered Providers are expected to have regard to local authorities' strategies in framing their own Tenancy Policies and we have worked closely with colleagues from Private Registered Providers, and other agencies, in the development of this Strategy.

It is important to note that RPs must 'have regard to' our Tenancy Strategy in developing their own Tenancy Policies. In addition, private RPs have already signed their contracts with the Homes and Communities Agency over the development of the new affordable rent product for the delivery of affordable housing until 2015, which means they will already have plans in place. However, we ask that RPs in West Essex review their own Tenancy Policies after the publication of this Strategy to ensure that, wherever possible, their policies work to complement, and do not conflict with, our Tenancy Strategy and local allocations/tenancy policies.

Objectives

1. To fulfil the statutory requirement to publish a Tenancy Strategy, following consultation with stakeholders;
2. To ensure that affordable housing meets locally, identifiable housing need;
3. To provide guidance and direction to RPs regarding their use of social and affordable housing tenancies;
4. To set out clearly to partner agencies and others, the expectations of the West Essex Housing Forum in relation to the use of flexible tenure;
5. To indicate to home seekers what they can expect from their fixed term tenancy, if one is granted, including arrangements for statutory reviews;
6. To provide a framework for working in partnership over flexible tenure, including establishing a joined up approach and joint governance arrangements;
7. To ensure that local authorities have regard to the Tenancy Strategy when reviewing its allocations policies and exercising its housing management functions; and
8. To keep the Tenancy Strategy under review.

Strategic Links

This Tenancy Strategy has a number of important links to other key documents, strategies and policies.

	Links
Allocations policy	Information about how applicants are prioritised for social rented housing can be found in each of the Councils' own Housing Allocations Schemes.

	Links
	Applicants whom are deemed to be the most vulnerable in the most acute housing circumstances who have been waiting the longest are prioritised for housing. Monitoring the effectiveness of this Tenancy Strategy can help to inform how applicants are prioritised and the kinds of tenancies granted for social and affordable rented housing in the future.
CBL framework	Irrespective of tenure type, all properties will continue to be advertised through our choice based lettings frameworks. The kind of tenancy will be clearly indicated on the property advert.
Homelessness Strategy	The local authorities' most recent Homelessness Strategies, seek to prevent homelessness, help those who are homeless and support people so they do not re-apply. The levels of homelessness acceptances and households in temporary accommodation fell significantly between 2003 – 2010, during the same period the number of households who were prevented from becoming homeless increased. Use of various tools to help people access accommodation in the private rented sector was the most successful method of finding alternative accommodation before someone became homeless. RPs should have regard to the Forum's Homelessness Strategies in framing their Tenancy Policies.
Housing Strategy	The individual Housing Strategies for each authority set out the detail of local housing supply, and demand and establish how locally, these two will be matched. RPs should also have regard to the Forum's Housing Strategies in framing their Tenancy Policies.
Use of private rented sector to resolve homelessness	The Localism Act 2011 provides local authorities with the power to end the statutory homelessness duty by making placements in private rented sector accommodation with or without the applicant's consent. The West Essex Housing Forum will consider using this power and may, wherever practicable, offer suitable private sector accommodation rather than social rented housing in certain circumstances. This would ensure that the Housing Register is the main access route into social housing in the three districts.
Government housing strategy "Laying the Foundations: A Housing Strategy for England"	The Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To accomplish this, the Government is seeking to: <ul style="list-style-type: none"> • Achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community • Widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need • Improve affordability across the housing market, including increasing the supply of housing and; • Create sustainable, inclusive, mixed communities in all areas, both urban and rural.

3. Governance

Each RP is responsible for its own individual Tenancy Policy.

It is proposed that the West Essex Housing Forum will establish a sub-group consisting of representatives of RPs and other key stakeholders. This group will support the West Essex Housing Forum in its role of monitoring and reviewing the effectiveness of this Strategy. This will be achieved by the monitoring of trends that can then be used to inform future policy. This will include the number of flexible tenancies let, outcomes of these, bidding activity on fixed term tenancy adverts and so on. The first review meeting will be held 6 months after publication of the Strategy, and ongoing review arrangements will be timetabled thereafter.

4. Evidence

The Appendix to this strategy sets out a range of data and information that has been used to inform this Strategy. This data will be reviewed periodically to ensure that the Strategy remains based on local market information. This will be one of the roles of the Sub-Group.

5. Tenancy Types

Use of tenancies

Where Register Providers wish to use flexible tenancies, we would expect them to be granted for a minimum term of 5 years. Those wishing to provide shorter tenancy terms of between 2-5 years will need to set out the circumstances in which these will be offered.

Tenancy reviews

We expect that RPs' tenancy policies will state that not less than 6 months before a flexible tenancy is due to end, it must be subject to a formal review.

If it is decided, as a result of the tenancy review, that on expiry of the tenancy a new flexible tenancy will not be granted, written notice advising the tenant of this must be served at least 6 months before the expiry of the tenancy. The notice must contain the reasons for the decision and, at the same time, notify the tenant of their right to request a review and the time within which a request may be made. Should a tenant seek a review and it is dismissed, the landlord will be able to seek possession of the property.

We expect that RPs' tenancy policies will provide clear criteria setting out the circumstances in which it will not grant a further tenancy on the coming to an end of an existing flexible tenancy. We expect that this criteria will include issues such as;

- Under occupation – Generally, we would expect new flexible tenancies for under-occupied properties not to be granted, although an offer of smaller accommodation may be appropriate. We expect RPs to set out in their Tenancy Policies how they anticipate dealing with issues such as children at university or a member of the family in prison.
- Overcrowding – It may be appropriate for tenants to move to larger accommodation
- Properties with major adaptations – Generally, we would not expect new flexible tenancies for properties with adaptations to be granted, where there are no longer any persons in need of the adaptations living at the property (provided that there is a need for the adapted property by a disabled person)
- Where tenants have sufficient income or assets to meet their own housing needs – It is acknowledged that different RPs will have different views and approaches on this matter. The Forum does not seek to specify a particular stance, but RPs' approach must be set out in their tenancy policies and Allocations Schemes.

- Conduct of tenancy – If tenancies have not been conducted well during the tenancy term (with regard to serious rent arrears and/or anti-social behaviour or other breaches of tenancy conditions) RPs may not wish to grant a new flexible tenancy
- Need for affordable housing – If tenants clearly no longer have a need for affordable housing, based on clear evidence, we would not expect RPs to grant a new flexible tenancy

The Tenancy Policy should not seek to address more minor housing management issues that can be dealt with through existing processes.

RPs' Tenancy Policies should make it clear that tenants will be made aware of the criteria when taking up their tenancy.

It is recognised that there may be circumstances in which it would be unreasonable to expect someone to move even if the relevant criteria is applied, and we would anticipate a RP's Tenancy Policy to explain when a new flexible tenancy might be granted. We anticipate this might cover circumstances such as:

- The tenant or a member of their household is suffering from a terminal illness; the tenant or a member of their household has a disability, verified by occupational therapy / community care assessments.
- The tenant is an active foster carer and a new flexible tenancy should be granted to enable them to continue to fulfil this role.
- The tenant is a care leaver and still receiving support from social services because of this.
- The tenant has children taking GCSE or A level examinations at a local school
- The tenant is participating in a Family Intervention Project programme

In such circumstances, we would expect a further flexible tenancy to be granted of the same or a suitable alternative property, rather than a new lifetime secure/assured tenancy.

Where a fixed term is to be brought to an end, there must be an identifiable need for the property type.

Notice period

When flexible tenancies are coming to an end, it is essential that Tenancy Policies provide that the tenant is given sufficient notice so that they can seek advice about their options. Accordingly, we expect that in accordance with Section 107 (D) of the Localism Act 2011 a notice will be served in writing not less than 6 months before the tenancy is due to end.

If the tenant refuses to move when the notice period expires, the normal eviction procedure will take effect.

Right to a Review

If a tenant disagrees with the decision reached by their landlord to terminate their tenancy, they may use the appeal process. Each Registered Provider is expected to set out in its Tenancy Policy the appeal process established, and tenants should be directed to this for guidance.

Housing advice and assistance at end of fixed term

Well in advance of a tenancy being terminated (at least six months), we expect that the RPs will offer advice and assistance to help the tenant find alternative housing. The nature of this support must be set out in each Tenancy Policy. This will include working proactively with the relevant local housing authority and with the tenant, to assist them to explore their options for alternative housing, which could include home ownership, a privately rented home or a more

suitable affordable rented home.

The three authorities will work with RPs to produce a protocol on how RPs and the Councils will work together on cases that may not be renewed. This will be produced within the first 12 months of publication of the Strategy.

7. Consultation on this strategy

Two workshops, independently facilitated, and discussions with key local authority officers have assisted in producing this final version of the Tenancy Strategy.

A formal consultation was undertaken on a draft version of this Tenancy Strategy, prior to the production and adoption of the final version.

8. Publishing this Strategy

This Tenancy Strategy will be published by each of the three authorities. It will be:

- Available on each local authorities' website
- Available at each local authorities' principal office for inspection at all reasonable hours without charge by members of the public
- A copy will be available on request at Council Offices, on payment if required by the authority

The Strategy will be kept under review and may be modified or replaced from time to time by the West Essex Housing Forum. If a revised version is published with material changes, stakeholders will be consulted on a draft first. In reviewing the Tenancy Strategy, the West Essex Housing Forum will have regard to the relevant Allocations Scheme, Homelessness Strategy and Housing Strategy of the three West Essex local authorities.

Appendix 1 Glossary of terms

Term	Explanation
Affordable Homes Programme 2011-15	The Government's investment programme aiming to increase the supply of new affordable homes in England. The majority of the new programme will be made available as affordable rent with some for affordable home ownership, supported housing and in some circumstances, social rent.
Affordable Housing	Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the open market.
Affordable Rent	Affordable housing where rent is charged at up to 80% of market rents. The tenancies can either be flexible tenancies or lifetime tenancies. Affordable Rent properties are not subject to the rent restructuring policy that applies to social rented housing.
DCLG - The Department of Communities and Local Government	The government department responsible for national housing policy

Fixed Term Tenancy	Applies to tenancies offered for a specific period of time rather than traditional “lifetime tenancies”
HCA – The Homes and Communities Agency	The national housing and regeneration delivery agency for England
Flexible Tenancy	Fixed term tenancy for a minimum of 5 years with a built in review period
Governance	This is the administrative checks put in place to make sure that the tenancy strategy is properly managed and accountable to local people
Housing Association	Independent, not for profit organisation providing affordable housing
Housing Forum	This meeting is made up from representatives from the three Councils and their partners to coordinate local decisions on Housing matters.
Housing Strategies	Both the Government (Laying the Foundations: A Housing Strategy for England) and Local Authorities produce housing strategies to guide decisions made on local investment in housing as well as guiding the allocation of housing to local people
Lifetime tenancies	Either Secure (council) or Assured tenancies (registered provider).
The Localism Act 2011	This Act was introduced by the current coalition government in order to update legislation in Housing particularly to allow local decisions to be made on housing and planning matters. Amongst other things the Act requires Councils and RP’s to have a Tenancy Strategy in place by March 2013.
Registered Provider	A provider of social housing registered with the HCA and subject to government regulation. Both profit and non-profit making social housing providers are registered with the HCA.
Market Rent	This refers to private sector rent levels. The rent levels used in this document are sourced from the Local Rents map and use Valuation Office data. Registered Providers will calculate market rent based on the Royal Institute of Chartered Surveyors guidance “ <i>Market Rent: a guide for providers of Affordable Rented housing</i> ”
Registered Social Landlords	Government funded not-for-profit organisations that provide affordable housing. They include housing associations, trusts and cooperatives.
RSR Regulatory Statistical Return	The annual HCA survey completed by all registered providers of social housing in England. Data includes information on size and type of home, location and rents over the year in the area.

Social Housing providers	Provider of subsidised social housing below market rent, including the Council and other registered providers such as housing associations.
Social Housing Regulator	The body responsible for regulating social housing. From 1st April 2012 this is the Regulatory Committee in the HCA.
Social Rent	Rents which are kept low through subsidy, to approximately a third to a half of market levels. The social housing sector is currently governed by a strictly defined system of rent control to ensure that rents are kept affordable.
SHMA Strategic Housing Market Assessment	A framework that local authorities and regional bodies can follow to develop a good understanding of how local housing markets operate. It promotes an approach to assessing housing need, which can inform the development of local development plans and housing policies.
Target Rent	This is the government's rent regime for social rented housing (owned by council's and registered providers). The original intention was to converge rents by March 31 st 2012 so that similar rents are charged for similar properties. This has now been revised to 2015/16. Every social rented property has a 'target rent', which is worked out using a formula set by the government. This means that rent rises are capped to current rent plus RPI+0.5% plus up to £2 per week.
West Essex Councils	This is a partnership of Epping Forest, Harlow and Uttlesford Councils.

Appendix 2 – Evidence base for the strategy

West Essex Market profile

Overview

The housing market area in which West Essex is located comprises, Brentwood Borough Council, Broxbourne Borough Council, East Herts District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council which are collectively called the London Commuter Belt (East)/M11 sub-region. West Essex is Epping Forest, Harlow and Uttlesford Councils.

West Essex has a population of approximately 272,102, with a population density of 1.75 people per hectare. This means that in terms of average density West Essex is well below the average at both the regional and national level (4.20 and 3.77 respectively).

74% of the housing stock is owner occupied
9% of the housing stock is privately rented
17% of the housing stock are affordable homes

Key Statistics

	Uttlesford	Harlow	Epping Forest
Population	72,438	78,768	120,896
Housing Stock overall	32,610	35,690	54,140
Average House Price (09)	£250,000	£160,000	£250,000

West Essex forms part of the London Commuter Belt M11 Housing Market assessment area. Information to support this appendix has therefore been taken from Census data, CLG data and the SHMA. The price of the average home purchased is nearly 7 times the average annual salary of the buyer.

The dominant **tenure** in the LCB area is owner-occupation (83%) of the total stock. Over 35% of the housing stock in Brentwood is owned outright (i.e. not subject to a mortgage) with slightly lower proportions in other Local Authority areas. Harlow has the lowest proportion at around 18%. The overall proportion of social rented housing in LCB is slightly higher than the English average but lower than the East of England average, although there are key differences between the authorities. Harlow has the highest proportion of social housing in the Eastern region (at 33.1% of all dwellings), while 15.4% of the dwelling stock of Epping Forest is social housing.

Based on population estimates from 2004, the Office of National Statistics estimate that the population of LCB (East)/M11 sub-region will rise to 620,000 by 2029. This would represent an 11% rise in the period 2004-2029 – an additional 62,000 people living within the study area. Of these, 12,200 are projected to be aged 85 or over with a further 44,200 aged 60-84 years.

The number of first time buyers is at a record low; 8 out of 10 first time buyers require financial assistance from family or friends and the average age of an un-assisted first buyer is 37. Social Housing Registers have almost doubled in the last 13 years and in West Essex we now have **XXXXX** households on the Housing Register.

The housing market in West Essex has experienced a bottoming out in house prices and some increase in sales volumes. Affordability and ability to access mortgage funding remain major issues.

There has been a marked switch in completions from flats to houses. In West Essex, houses accounted for 68% of all completions in 2009-10, compared to 49% the year before.

Property transactions are a better indicator of the health of the housing market than prices. In the year to June 2010 transactions increased by 7% in the area, compared to a 2% increase in the East. However, levels remain about 40% of normal market volumes recorded in the decade to 2007.

Affordable rents

Since April 2011, the level of grant available from the Homes and Communities Agency (HCA), which provides public funding to deliver affordable housing, has reduced. This is expected to have an adverse impact on the ability of RPs to deliver new affordable homes in West Essex. In order to address this, the Government has enabled RPs to offer new tenants a new type of tenancy under the Affordable Rent regime.

This new tenure has its rents set at levels of up to 80% of local market rents, including service charges. This tenure is less affordable as rents are significantly higher than the traditional social or target rents. The Affordable Rent tenancies generate increased income for RPs and, in this way, reduce the level of capital subsidy required.

The generally accepted definition of "Affordable Housing" is that **not more than 25% of gross household income** is spent on housing costs. However, households spend more in practice, especially those on low incomes

- Households who are earning and not claiming benefits are better able to afford.
- Many in this group could probably afford market rents.
- Households on the waiting list who are reliant on benefits to some extent are least able to afford.
- A proportion of social rented tenants on a Housing Register could afford market rents, and Affordable Rents assist many of the remainder – however these are small absolute numbers

Affordable Rents are allowing Providers to deliver affordable housing with much less grant. However, many of those households in priority housing need are unable to afford Affordable Rents set at 80% of market rents, based on their current incomes. Some existing tenants in social rented homes would be able to afford Affordable Rent but their willingness to move into this tenure is uncertain.

Most of those households who have registered their interest in intermediate affordable housing would be able to afford Affordable Rent based on their current incomes and it could help those needing larger properties in particular. Housing Benefit will generally allow households to access properties priced at 80% of market rents but would not be affordable for some property sizes in parts of Uttlesford and Epping Forest. Three changes to the benefit system could have more dramatic impacts on the ability of households to afford suitable accommodation: Universal Credit, the Benefit Cap and the localisation of Council Tax Benefit.

Unsuitable Housing

An example of unsuitable housing that often necessitates re-housing is **overcrowding**. In 2001, 5.5% of households in the sub-region lived in overcrowded conditions but there are significant variations by Local Authority and tenure. Overcrowding in the private rented sector was highest in Harlow at 15% of private tenants. There is very little overcrowding in owner occupied housing.

The SHMA has established that a high proportion of **BME households** experience overcrowding in West Essex. 24% of Bangladeshi, 22% of Black African and 20% of Chinese households across the SHMA area were overcrowded. In comparison, the lowest proportion of overcrowding was for the White British group at 5.1%.

Summary

With many excluded from home ownership by current conditions in the mortgage market, the demand for private rented property continues to grow. The indications are that, generally, market rents have increased over the course of 2010.

	Local Authority											
	Brentwood	%	Broxbourne	%	East Herts	%	Epping Forest	%	Harlow	%	Uttlesford	%
Market Housing												
1 bedroom	-	0.0%	100	5.9%	300	3.9%	-	0.5%	1,200	12.2%	-	1.0%
2 bedrooms	-	22.2%	700	31.1%	2,000	24.4%	600	31.6%	3,300	33.8%	800	19.4%
3 bedrooms	100	50.2%	1,100	49.0%	3,900	47.3%	900	47.1%	4,200	44.0%	1,900	46.7%
4 bedrooms	-	22.7%	300	11.7%	1,600	19.7%	300	17.2%	800	8.6%	1,100	25.9%
5+ bedrooms	-	4.9%	100	2.2%	400	4.7%	100	3.7%	100	1.5%	300	6.9%
Sub-total	200	100%	2,300	100%	8,300	100%	2,000	100%	9,700	100%	4,200	100%
Intermediate Affordable Housing												
1 bedroom	300	14.9%	200	26.0%	1,900	36.2%	200	12.1%	-	-	800	31.4%
2 bedrooms	900	40.9%	300	33.9%	1,600	30.6%	800	42.7%	-	-	900	32.7%
3 bedrooms	800	38.6%	300	35.4%	1,500	28.7%	700	39.5%	-	-	800	30.5%
4 bedrooms	100	4.8%	-	4.0%	200	3.8%	100	4.8%	-	-	100	4.4%
5+ bedrooms	-	0.9%	-	0.7%	-	0.8%	-	0.9%	-	-	-	0.9%
Sub-total	2,100	100%	900	100%	5,100	100%	1,800	100%	-	-	2,600	100%
Social Rented Housing												
1 bedroom	300	36.3%	600	38.8%	600	41.1%	1,000	40.0%	800	38.0%	400	34.6%
2 bedrooms	400	41.1%	600	35.6%	600	31.8%	800	28.1%	1,000	37.0%	400	34.7%
3 bedrooms	200	20.4%	400	22.8%	500	24.6%	1,000	27.9%	700	22.4%	400	27.4%
4 bedrooms	-	1.8%	-	2.4%	-	2.1%	100	3.7%	100	2.4%	-	2.8%
5+ bedrooms	-	0.3%	-	0.3%	-	0.4%	-	0.3%	-	0.3%	-	0.5%
Sub-total	1,000	100%	1,600	100%	1,800	100%	2,900	100%	2,500	100%	1,300	100%
All Housing												
1 bedroom	600	15.4%	1,000	17.9%	2,800	14.8%	1,200	17.7%	2,000	15.9%	1,300	12.2%
2 bedrooms	1,300	35.1%	1,600	33.4%	4,200	26.7%	2,200	32.3%	4,200	35.1%	2,100	24.6%
3 bedrooms	1,100	37.4%	1,900	39.4%	5,900	40.8%	2,700	38.4%	4,900	40.3%	3,200	40.5%
4 bedrooms	200	10.0%	300	7.8%	1,900	14.3%	500	9.8%	900	7.4%	1,200	18.0%
5+ bedrooms	-	2.1%	100	1.4%	400	3.3%	100	1.9%	100	1.2%	300	4.7%
Total	3,200	100%	4,800	100%	15,200	100%	6,600	100%	12,200	100%	8,100	100%

Source

<http://neighbourhood.statistics.gov.uk>

Sub-regional SHMA

Housing Strategies

Core Strategies

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