

# **Harrow Council Homelessness & Rough Sleeping Strategy 2019-2024**

## **1. Introduction**

The Homelessness and Rough Sleeping Strategy sets out Harrow Council's approach to meeting statutory homelessness duties and addressing all forms of homelessness and rough sleeping in Harrow.

The number of households approaching the Council for housing advice and assistance remains high and the focus continues to be on homelessness prevention.

Harrow Council's Homelessness and Rough Sleeping Strategy is central to delivering the Housing Strategy's objective of 'Preventing and tackling homelessness and rough sleeping'.

The Homelessness and Rough Sleeping Strategy provides a strategic framework and identifies priority areas. It should be read in conjunction with the **Housing Strategy**, the **Housing Allocations Scheme**, the **Tenancy Strategy and Policy** and the **Housing Evidence Base**.

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

Homelessness can often be prevented, if help is sought early enough. With the right advice, at the right time no-one should become homeless intentionally. It can help those at risk of becoming homeless to remain in their existing home and prevent the trauma of having nowhere to live. In the first instance the focus is to prevent homelessness at an early stage and secondly, where this is not possible, to support homeless households and those in housing need secure economically realistic housing.

The Homelessness and Rough Sleeping Strategy objectives are:

1. Preventing homelessness through advice, support and the use of personalised housing plans
2. Reducing the number of households in temporary accommodation
3. Helping people access economically realistic housing options
4. Providing extra help with housing advice and options to vulnerable groups
5. Supporting rough sleepers to find housing solutions and access other key services
6. Communicating key homelessness messages to residents and professionals.

The objectives of the Homelessness and Rough Sleeping Strategy will be delivered through Harrow Council Housing Services' Smarter Housing Plan and Harrow Council's Harrow Ambition Plan.

This strategy meets the requirements of the Homelessness Act 2002, Homelessness Reduction Act 2017 and the Government's national Rough Sleeping Strategy 2018.

## **2. Context, drivers and key data**

The context, drivers and key data can be found in the **Housing Evidence Base**.

Tackling homelessness is a key priority at all levels, locally, sub-regionally, regionally and nationally. The most recent significant national policy and legal changes are the Homelessness Reduction Act 2017 and the Government's national Rough Sleeping Strategy 2018. The housing crisis is one of the Mayor of London's biggest priorities, as reflected in the London

Housing Strategy. The Mayor of London is also addressing rough sleeping through the Rough Sleeping Action plan and a range of projects and services.

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

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

Harrow has a small social housing stock with a high demand for housing from homeless households, home seekers on the housing waiting list and tenants waiting to move to alternative social housing. Few council homes become available every year, even taking into account our council house building programme. Nearly half of Harrow's have been sold under the Right to Buy (RTB) since 1980.

The most common reason for homelessness in Harrow is loss of private rented accommodation, followed by parents no longer willing or able to accommodate.

Different types of temporary accommodation are used to house homeless households including bed and breakfast accommodation (B&B), homeless hostels, private sector leasing (PSL), permanent council stock, housing association leasing scheme (HALS), the private rented sector and homes acquired by the council for use as temporary accommodation.

There is a heavy reliance on the private rented sector in Harrow for both temporary and permanent housing solutions. Private rents are not affordable for many households because private rents have increased but incomes have not kept up.

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

Affordability is a key challenge in Harrow. The Local Housing Allowance (LHA) rates are the maximum amount of Housing Benefit that can be claimed by tenants who rent from a private landlord. Some claimants need to apply for the housing element of Universal Credit instead. Many private rents in Harrow are above the LHA rates and tenants must make up the shortfall from their other income.

Welfare reform, particularly changes to Housing Benefit, the reduction of the Benefit Cap and the introduction of Universal Credit, has had an impact on households in housing need and their ability to find suitable affordable private rented sector accommodation in Harrow. An additional challenge is concern from some landlords about the risk of tenants falling into rent arrears due to the way Universal Credit is administered.

The Housing Act 1996, as amended by the Homelessness Act 2002, is the main piece of homelessness legislation and sets out the legal duties that all local authorities have towards people who are homeless. Requirements from new policy and legislation such as the Homelessness Reduction Act 2017 and the Government's national Rough Sleeping Strategy have changed the way services are delivered and reported. H-CLIC (Homelessness Case Level Information Classification) is the new statutory homelessness case level data collection that replaces the P1E to monitor the Homeless Reduction Act 2017.

Since the Housing Act 1996 was amended by the Localism Act 2011, local authorities have been able to discharge their homelessness duties with an offer of suitable accommodation in the Private Rented Sector (PRS). The Homelessness Reduction Act 2017 further amended the Housing Act 1996 and extends this option to all households facing homelessness.

In view of the ongoing challenge of lack of availability of affordable housing in all tenures the main housing options for homelessness households in Harrow are as follows:

- 1) Remaining in or close to Harrow but topping the rent up from other household income as the Local Housing Allowance (LHA) rates for Housing Benefit or Universal Credit are unlikely to cover the full rent in the private rented sector
- 2) Remaining in or close to Harrow but securing a private rented property that is smaller, and therefore less expensive, than the size that would meet the household's housing need
- 3) Moving out of Harrow and London to locations where social housing is more readily available
- 4) Moving out of Harrow and London to locations where private rented housing is more affordable and where there is more choice
- 5) Waiting for an offer of social housing

Waiting for an offer of social housing in Harrow is not a realistic option. Homelessness is not a route to securing social housing in Harrow. We are likely to discharge (end) our duty with an offer of a permanent housing solution in the private rented sector. Despite all efforts to secure more properties in Harrow families often have to be housed elsewhere, where housing is more affordable.

When the Council is able to offer social housing, the priority is to allocate it to households with the highest housing need. These are people on the housing register who have an exceptional need to move, or have another serious need to move, haven't been able to resolve their housing problem in another way and have usually been waiting a long time. Occasionally, accepted homeless households who have been living in temporary accommodation for a very long time (usually well over 10 years) can be offered accommodation but most people who apply for social housing will never be rehoused. More information is available in our Housing Allocation Scheme.

### **3. Review of homelessness in Harrow**

The Homelessness Act 2002 requires all local authorities to carry out a review of homelessness in the borough every five years and to use the review as the evidence base for its strategy.

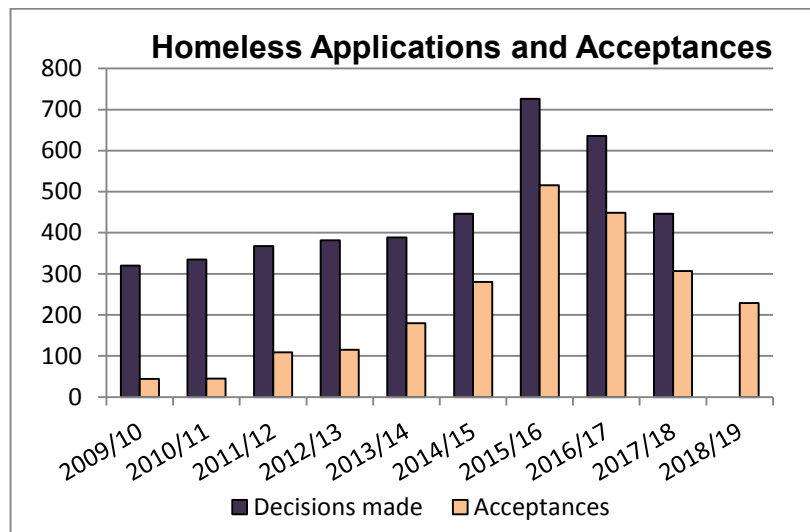
#### **a) Levels of homelessness in the borough**

##### **Levels of Homelessness**

The number of people to whom the local housing authority has accepted the main homelessness (housing) duty has varied over the past five years.

Homeless Applications & Acceptances:

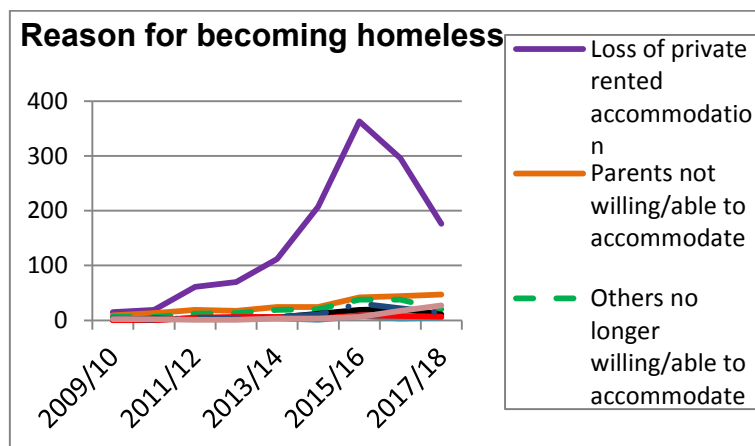
Year	Decisions made	Acceptances	% accepted
2009/10	320	44	13.8
2010/11	335	45	13.4
2011/12	368	109	29.6
2012/13	382	115	30.1
2013/14	389	180	46.3
2014/15	446	280	62.8
2015/16	726	516	71.1
2016/17	636	449	70.6
2017/18	446	307	68.8



Source: P1E

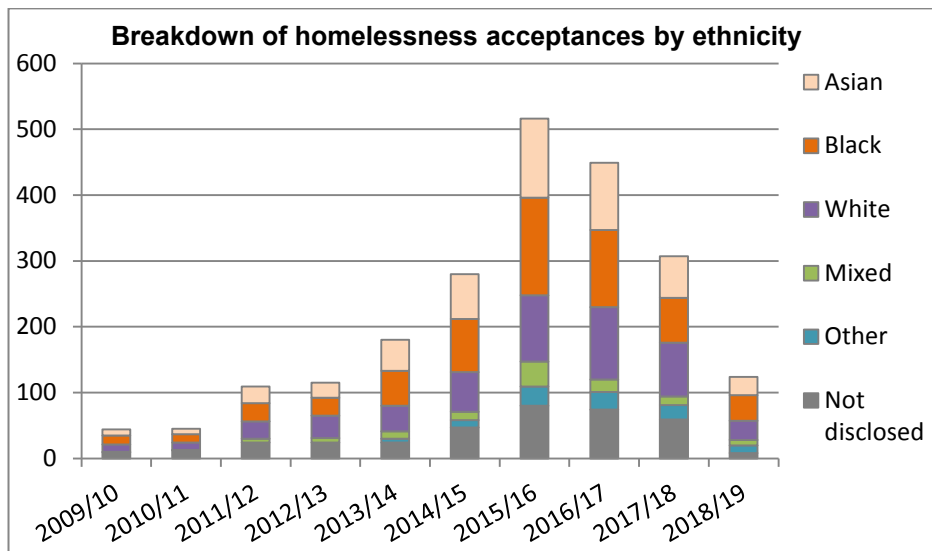
**Reason for becoming homeless**

The largest single reason for becoming homeless continues to be ‘loss of private rented accommodation’. This reason accounted for 57% of all homelessness applications in 2017/2018. It was also the most common reason recorded during 2018/19 in at least 158 cases.



Source: P1E

## Breakdown of homelessness acceptances by ethnicity



Source: P1E

## Rough sleeping

All local authorities are required to submit an annual rough sleeping estimate to MHCLG to indicate the number of people sleeping rough in their area on a typical night. This snapshot figure can be calculated using either a count-based estimate of visible rough sleeping, an evidence-based estimate meeting using evidence from different agencies or an evidence-based estimate meeting including a spotlight count using evidence from different agencies. Homeless Link is funded by MHCLG to support local authorities with this exercise.

The annual rough sleeping estimate is a snapshot figure of those people seen, or thought to be, sleeping rough on a single 'typical' night. It does not include everyone in an area with a history of sleeping rough, or everyone sleeping rough in an area across the October-November period.

Since 2010, the figures used for national statistics have used the following definition of rough sleeping:

*“People sleeping, about to bed down (sitting on/in or standing next to their bedding) or actually bedded down in the open air (such as, on the streets, in tents, doorways, parks, bus shelters or encampments). People in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations, or ‘bashes’).*

*The definition does not include people in hostels or shelters, sofa surfers, people in campsites or other sites used for recreational purposes or organised protests, squatters or Travellers sites.*

The annual rough sleeping estimate data for Harrow is as follows:

<b>Year</b>	<b>Number of rough sleepers</b>
2010	1
2011	1
2012	2
2013	4
2014	4
2015	6
2016	10
2017	10
2018	13

In 2018 there were 13 rough sleepers, representing a rough sleeping rate of 1.5 per 10000 households. Of the 13 rough sleepers identified 10 were male and 3 were female, all were aged 26 or over and 5 were UK nationals, 6 were EU non-UK nationals, 1 was a non-EU national and 1 was 'nationality unknown'.

National statistics for rough sleeping, including for Harrow, are available at:

<https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2018>

There is currently no dedicated ongoing national data collection for the total numbers of people sleeping rough in England throughout the year. In some areas, street outreach teams record all rough sleeping activity and can produce regular reports (e.g. CHAIN in London), but this is not a national arrangement and there isn't a systematic and consistent approach.

The Combined Homelessness and Information Network (CHAIN) is a multi-agency database recording information about rough sleepers and the wider street population in London. CHAIN is commissioned and funded by the Greater London Authority (GLA) and managed by St Mungo's. It is a detailed and comprehensive source of information about rough sleeping.

People are counted as having been seen rough sleeping if they have been encountered by a commissioned outreach worker bedded down on the street, or in other open spaces or locations not designed for habitation, such as doorways, stairwells, parks or derelict buildings. The report does not include people from hidden homeless groups such as those sofa surfing or living in squats, unless they have also been seen bedded down in one of the settings outlined above.

The CHAIN Annual Report shows the following data for Harrow for the number of people seen rough sleeping in Harrow (calculated using the flow, stock, returner model):

<b>Year</b>	<b>Total</b>
2010/2011	5
2011/2012	21
2012/2013	32
2013/2014	48
2014/2015	45
2015/2016	65
2016/2017	43
2017/2018	33
2018/2019	30

Flow means new rough sleepers, stock means those seen across at least two consecutive years and returner means those seen before but with gaps in their rough sleeping histories.

Of the 30 rough sleepers identified in Harrow in 2018/19, 24 were male and 6 were female. 4 were aged 18-25 years, 4 were aged 26-35 years, 9 were aged 36-45 years, 10 were aged 46-55 years and 3 were aged over 55 years.

In terms of nationality 13 were from the UK, 9 were from the CEE and 8 were from other countries In terms of ethnicity 7 were White British, 4 were White Irish, 10 were White Other, none were Black, 8 were Asian and 1 was Mixed.

The rough sleepers identified had a range of support needs. 8 had support needs relating to alcohol, 3 had support needs relating to drugs, 8 had support needs relating to their mental health, 3 had no support needs relating to alcohol, drugs or mental health. 1 had an Armed Forces background, 1 had been in care and 8 had been in prison. 11 had no experience of armed forces, care or prison.

The reports from CHAIN and information on the assistance provided by St Mungo's can be seen at <https://data.london.gov.uk/dataset/chain-reports> and at <https://www.mungos.org/work-with-us/chain/>

It is likely that the number of rough sleepers in Harrow is higher than the CHAIN data and the annual rough sleeping estimate. We estimate during the course of a year 100 or more people could spend one or more nights as street homeless in Harrow.

FirmFoundation is a local charity based in Harrow working with homeless people. The services provided include the weekly signposting drop-in, the weekly day centre drop-in, the Winter Night Shelter (January to March), outreach and floating support and Hope Place supported housing.

FirmFoundation’s data on the use of its Winter Night Shelter is as follows:

<b>Year (Jan to March only)</b>	<b>Total Number Using the Shelter</b>	<b>Number with a Local Connection</b>
2011	31	15
2012	22	17
2013	17	13
2014	30	21
2015	20	12
2016	30	21
2017	39	27
2018	33	24
2019	47	39

47 people used the night shelter in 2019 and 39 of these had a local connection. Many of these individuals will not be included in CHAIN data so they are not ‘verified’ rough sleepers. The Shelter provided bed spaces for a total of 38 men and 9 women. The youngest guest was aged 18 years and the oldest was 67 years old. Guests from the UK made up just under 40%, a 20% decrease from the previous year. Non-UK rose by 18% and EEA Nationals by 2%. 21% of the Winter Shelter 2019 guests presented with mental health issues.

FirmFoundation data indicates an estimated 20 to 25 rough sleepers in Harrow on any given night, taking into account individuals using the drop-in services and those known to the organisations but who do not engage.

Many rough sleepers choose secluded locations and do not divulge their sleep sites so may not be included in estimated street counts and other data sources.

**b) Activities which are carried out to prevent homelessness**

As loss of a private rented tenancy is the main cause of homelessness, homelessness is often prevented by sustaining existing tenancies in the private rented sector.



Homelessness prevention activities include:

- negotiation with private rented sector landlords
- negotiation with family or friends threatening exclusion
- family mediation
- financial assistance and incentives (deposit, rent in advance, rent top-up)
- resolving Housing Benefit/Universal Credit problems, rent arrears and mortgage arrears
- Sanctuary scheme measures for domestic violence
- resolving general management and disrepair issues
- addressing tenant behaviour issues
- working with a range of partner services and agencies.

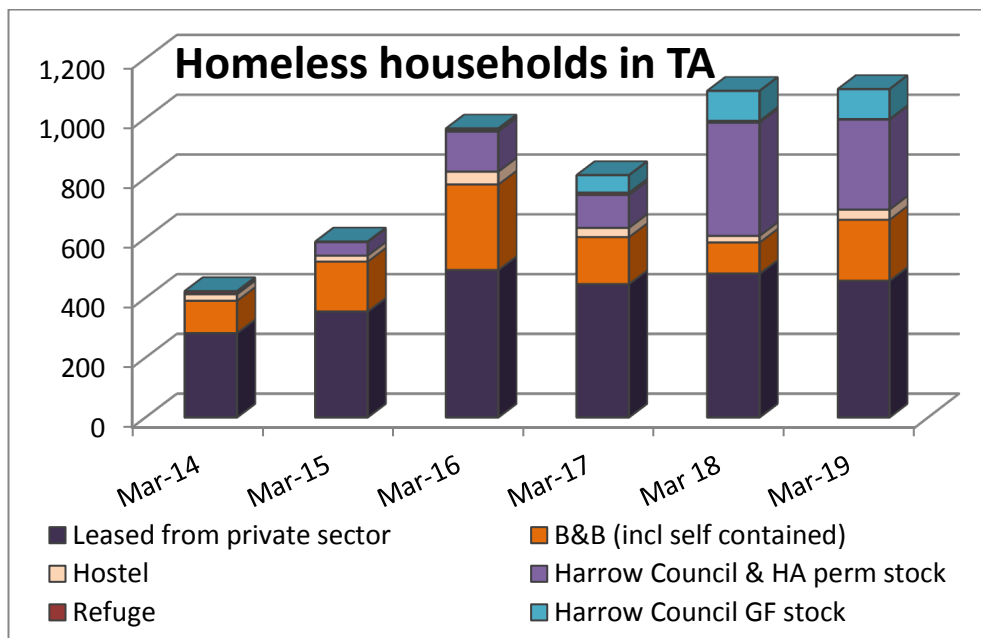
**c) Activities carried out to secure homelessness accommodation**

The Council works with a range of partners to secure the necessary homelessness accommodation, as outlined in the Homelessness Accommodation Procurement Strategy.

At September 2019 there were 1, 200 households in temporary accommodation, including 222 in B&B.

Different types of temporary accommodation are used to house homeless households including bed and breakfast accommodation (B&B), homeless hostels, private sector leasing (PSL), permanent council stock, housing association leasing scheme (HALS), the private rented sector and homes acquired by the council for use as temporary accommodation.

Homeless households in TA:



Source: P1E/Locata

<b>Temporary Accommodation, June 2019</b>	
B&B	216
PSLs	522
Vernon Lodge	27
Council stock	191
HALS and HALD	71
Gayton Road Properties	71
Smart lettings	100
Robinson Court	16
Private Rented	5
Gildea House	8
Homeless at Home	12
<b>Total</b>	<b>1,239</b>

### **Bed & Breakfast**

A range of bed and breakfast accommodation is identified in Harrow and further away.

### **Homeless hostels**

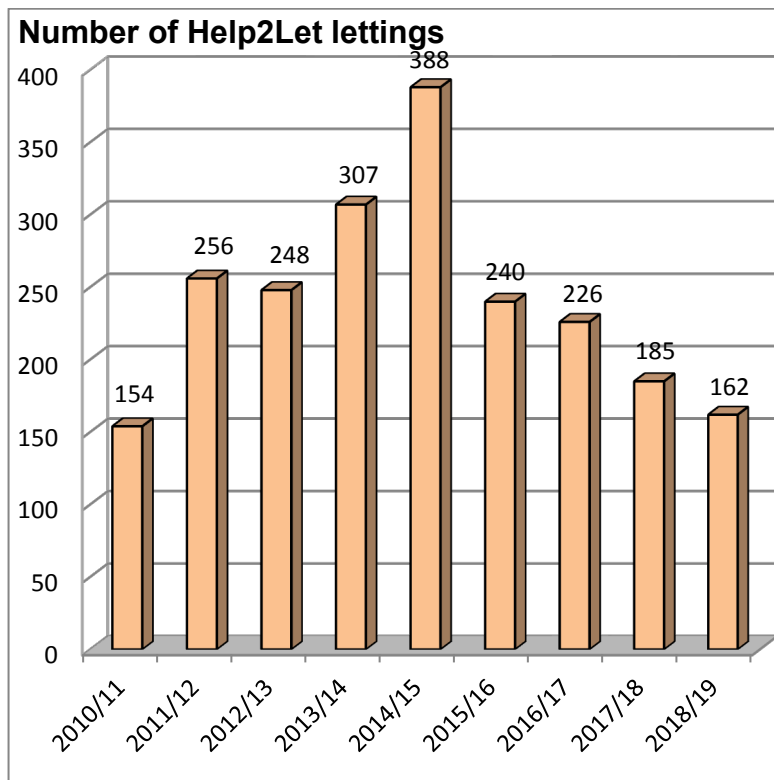
Vernon Lodge is owned by Harrow Council and currently managed by Notting Hill Genesis. Robinson Court is owned and managed by Network Homes. A proportion of the accommodation at Gildea House, owned by Network Homes and managed by SSAFA the Armed Forces charity, is used as homeless accommodation.

### **Private Sector Leasing**

Harrow Help2Let

Harrow's Help2Let team secures good quality long term temporary accommodation at Local Housing Allowance (LHA) rates. The team has procured 162 units of private rented accommodation during 2018/2019, allowing the council to discharge its homelessness duty.

Number of Help2Let lettings	
2010/11	154
2011/12	256
2012/13	248
2013/14	307
2014/15	388
2015/16	240
2016/17	226
2017/18	185
2018/19	162



Source: Help2Let

### Permanent council stock

Some permanent council housing is used as a temporary accommodation. At March 2019 there were 4,762 permanent council properties, 205 of which were being let as temporary accommodation.

### Grange Farm Estate

Grange Farm Estate is a Harrow Council estate that is undergoing regeneration. Some empty flats are used as temporary accommodation and those tenants are classed as non-secure tenants. As the estate regeneration progresses and decanting continues there will be fewer units available for use as temporary accommodation.

### Homes acquired by the council

Harrow Council has purchased 100 homes for use as temporary accommodation, in Harrow and outside of Harrow in locations such as Aylesbury. Additional homes are being purchased in line with budget availability. Some of the homes purchased are council homes that were previously sold under the Right to Buy.

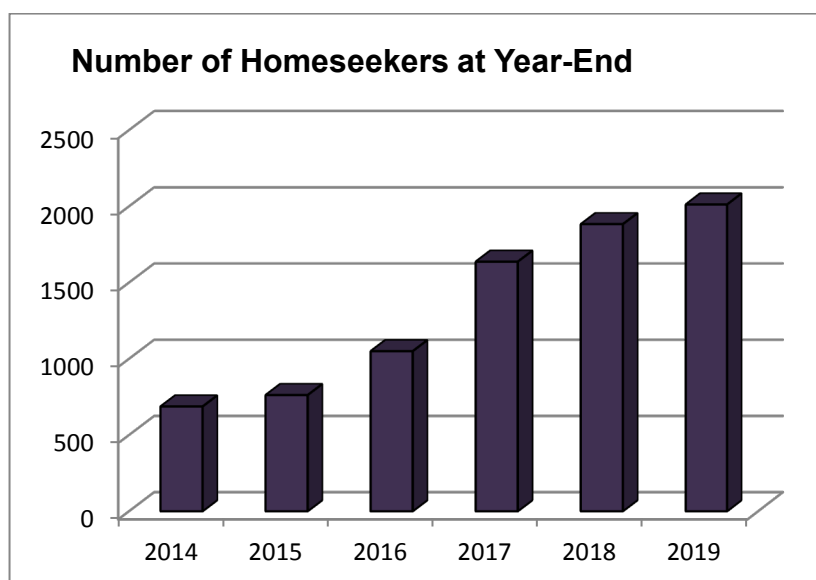
### Social Housing

In 2018/19 only 201 council properties became available to let.

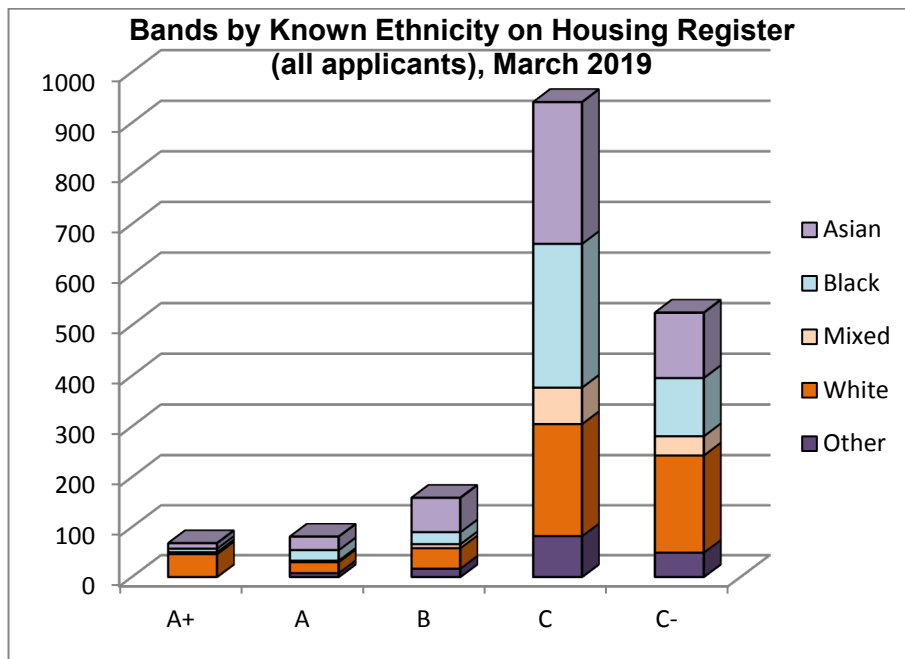
	2017/18	2018/19
Total 'true' re-lets	172	201
General Needs	147	159
Sheltered	25	42
0/1 bed	98	127
2+ bed	74	74
Additional TA re-lets	71	44

At 1 April 2019 the housing register comprised 2,012 home seekers and 176 existing social housing tenants waiting to move to alternative social housing.

Number of Homeseekers at Year-End



Source: Locata



Source: Locata

Social housing is rarely a solution for homeless households. When the Council is able to offer social housing, the priority is to allocate it to households with the highest housing need. These are people on the housing register who have an exceptional need to move, or have another serious need to move, haven't been able to resolve their housing problem in another way and have usually been waiting a long time. Occasionally, accepted homeless households who have been living in temporary accommodation for a very long time (usually well over 10 years) can be offered accommodation but realistically most people who apply for social housing will never be rehoused. More information is available in our **Housing Allocations Scheme**.

#### d) Resources

Our approach to procuring homelessness accommodation is outlined in Appendix 2.

The resources available to meet our statutory homelessness duties include Harrow Council's General Fund budget, Flexible Homelessness Support Grant and Discretionary Housing Payments.

Additional resources have been secured for single homelessness and rough sleeping services in 2019/2020 from the Rough Sleeping Initiative grant, Rapid Rehousing Project grant and the PRS Access Fund grant. Having successfully bid for funding to develop services for rough sleeping and single homelessness, we intend to continue delivering these services using our general homelessness resources if future specialist funding ends.

Details of the allocation of Flexible Homelessness Support Grant can be found here: <https://www.gov.uk/government/publications/flexible-homelessness-support-grant-2019-to-2020>

Details of the allocation of funding for Discretionary Housing Payments can be found here: <https://www.gov.uk/government/publications/housing-benefit-subsidy-circulars-2019/s12019-2019-20-discretionary-housing-payments-government-contribution-for-english-and-welsh-local-authorities#annex-a-2019-20-dhp-government-contribution-la-allocations>

#### 4. Rough Sleeping

Some rough sleepers are new to the streets and are seen rough sleeping just once. There are services in London to prevent rough sleepers from spending a second night on the streets. Some people seen rough sleeping for the first time may have approached their Local Authority Housing Options service for help prior to first being seen rough sleeping but others may not. Due to the geography of London there may be mobility between boroughs.

Rough sleepers may have lived in different types of accommodation as their last longer term or settled base prior to being seen rough sleeping. This might be long term accommodation such as private rented accommodation, council accommodation, owner occupied accommodation and tied accommodation (for example provided with a job). It might be short or medium term accommodation such as a hostel, temporary accommodation or an institution (such as hospital or prison). At their last settled base they may have been a tenant, an owner occupier, living there in an informal arrangement, living with parents or living with a partner.

Rough sleepers may have different reasons for leaving their last longer term or settled base prior to being seen rough sleeping. They may have been asked to leave or they may have been evicted due to rent arrears, anti-social behaviour or for other reasons. They may have lost their job or had financial difficulties such as debt. They may have experienced a relationship breakdown or bereavement. They may have come to an area to be nearer family, friends or an established community that they have links to.

Some may have been the victim of violence, harassment or abuse, including domestic violence, gang activity, hate crime or cuckooing. Some rough sleepers may be perpetrators of violence, harassment or abuse and may have lost their housing as a result of this.

#### **Pan London**

A range of services for rough sleepers operate across London.

Across London the organisation **StreetLink** enables the public to alert services about rough sleepers they're concerned about, so that they can be found and linked into services. Members of the public can report their concerns using the website, mobile app or telephone line. Further information can be found here: <https://www.streetlink.org.uk/>

**London Street Rescue** provides outreach services in London boroughs that don't have their own services. Its work includes connecting new rough sleepers across London to No Second Night Out. Further information can be found here: <https://thamesreach.org.uk/what-we-do/response/outreach-services/london-street-rescue/>

**No Second Night Out (NSNO)** is an assessment and reconnection service for rough sleepers who are new to the streets, comprising three assessment hubs, plus short term 'staging post' accommodation. NSNO also provides 'Floating Hubs' for both new and longer-term rough sleepers. Further information can be found here: <http://www.nosecondnightout.org.uk>

**Routes Home** is a service to support non-UK nationals sleeping rough. Further information can be found here: <http://www.routeshome.org.uk/>

**Clearing House** allocates homes specifically earmarked for London's rough sleepers. Further information can be found here: <https://www.mungos.org/our-services/clearing-house/>

**Severe Weather Emergency Provision (SWEP)** is a short-term, temporary shelter that is provided to anyone sleeping rough, regardless of their local connections or recourse to public funds. It is activated any time that the temperature is forecast to reach 0°C or below. Further information can be found here:

[https://www.london.gov.uk/sites/default/files/london\\_swep\\_guidance\\_2018-19.pdf](https://www.london.gov.uk/sites/default/files/london_swep_guidance_2018-19.pdf)

## **West London**

A range of services for rough sleepers operate across West London.

### **Rough Sleeping Prevention Service**

This service is now part of the Somewhere Safe to Stay pilot (see below).

The Rough Sleeping Prevention Service started in August 2017, funded by Rough Sleeping Grant and contributions from West London boroughs. St Mungo's delivers the service through a contract with the Royal Borough of Kensington and Chelsea (RBKC) as the lead borough. An additional prevention officer was also funded as part of this service. The team were based at a hub in Brent and the service was very successful with 617 rough sleeping preventions achieved in 19 months (original 24-month target 418), mainly through mediation (184) & PRS access (326).

### **Somewhere Safe to Stay (SSStS) Pilot**

This service started in February 2018 and is delivered by St Mungo's through a contract with RBKC. This service is funded by the MHCLG Rapid Rehousing Pathway Early Adopters fund.

There are 4 elements to this service;

- Triage – taking referrals from housing options teams and other agencies e.g. JCP
- Rough Sleeping Prevention Service is part of it & will be funded from this money from Sept 2019-March 2020
- 9 sit-up beds in the hub (in LBHF) with 24/7 staffing, target 72-hour turnaround – intensive work to secure move-on, mainly PRS
- 9 rooms within the hub, for more complex cases – intensive work to secure move-on; mainly supported housing

Additional staff members were recruited so that service is 24/7, and can take higher needs clients.

There have been 167 successful outcomes (homeless preventions / relief) in the 7 months between March and August, with 97 placed in the PRS, 19 in supported housing and 16 successful mediations with family/friends.

### **PRS Staging Post**

This service is delivered by St Mungo's under a contract with RBKC from October 2018 and is funded by the Rough Sleeping Initiative grant.

Staging Post in Brent has 9 rooms, for rough sleepers from NSNO, borough assessment or emergency beds or SStS, who are PRS ready.

The project has two objectives:

- To move rough sleepers into the Staging Post from NSNO hubs, assessment & emergency beds, thus creating space for people to be moved off the streets into the hubs & beds
- To work intensively with those who are placed in the Staging Post to secure PRS & relieve homelessness for rough sleepers

The project opened in November 2018. By August 2019, 43 people had been placed in the Staging Post and 30 had been successfully moved on.

### **Supported Lettings**

This service is delivered by Caridon Foundation under a contract with Brent from September 2019 to May 2020. It is funded by MHCLG Rapid Rehousing Pathway to provide a West London Supported Lettings (Floating Support Service) for rough sleepers and those at risk of rough sleeping. Referrals are made by SStS, Staging Post, other Staging Posts, NSNO hubs, outreach teams & hostels. Individuals must have a West London connection and have accepted an offer of PRS or other unsupported accommodation in West London. The service will take 20 new referrals per month; building up to a caseload of 80 by December 2019. They offer support of approximately 2 hours a week for up to 3-4 months. 9 referrals were received from SStS & Staging Post by mid-September, so referrals have been opened up to other agencies.

### **PRS Access Scheme**

This scheme provides an Approved Provider List for PRS Access for Single Homeless but there is currently only one active provider, New Day. The scheme provides access to the PRS for single homeless with low/no support needs including help to claim Universal Credit/Housing Benefit, arrange direct payment to landlord and tenancy sustainment. The scheme has been in place since December 2011 and New Day had placed 866 people by August 2019. A total of 1666 have been placed by approved providers and a further 368 found their own through the voucher scheme, making 2034 overall. This scheme is funded by the MHCLG PRS Access Fund and Better Homes Grant.

### **Out of London PRS Project**

West London boroughs fund this project and properties are procured mainly in the West Midlands, where two officers are based. They inspect, meet and greet & provide resettlement / tenancy sustainment support for households moving from London, mainly those subject to the benefit cap, to suitable, affordable accommodation. Some boroughs offer this as an option, others enforce offers. Some also place households owed a social care duty e.g. NRPF, intentionally homeless families. 534 households from West London boroughs have been placed since the project went live in October 2016. Property improvement is funded by the Better Homes Grant.

### **Harrow**



Harrow Council has secured funding from the Rough Sleeping Initiative, the Rapid Rehousing Project fund and the PRS Access Fund to develop services for single homeless households and rough sleepers.

The Rough Sleeping Initiative grant funding has enabled the council to recruit a Rough Sleeping Coordinator to scope the level of rough sleeping, procure rooms for rough sleepers in the private rented sector and develop responses. It has also enabled us to work with Firm Foundation to increase the number of supported housing spaces available locally for rough sleepers and to increase the provision of floating support and outreach work for rough sleepers, including mental health support.

The Rapid Rehousing Project grant funding has enabled the council to recruit a Single Homelessness Adviser to support for single homeless households, procure shared rooms in the private rented sector and provide some deposits and rent in advance.

The PRS Access Fund grant funding has enabled the council to participate in the transitional insurance scheme as an alternative to deposits or rent in advance.

Harrow Council works in partnership with key local partners such as the charity FirmFoundation. FirmFoundation is a local homelessness charity in Harrow. It runs a range of services for rough sleepers and single homeless people including a winter night shelter, supported accommodation, weekly single homelessness signposting drop-in (for information and advice) and a weekly single homelessness day centre drop-in (for food, a shower and a chat). More information about their work can be found at <http://firmfoundation.org.uk>

There are other local services such as Harrow Food Bank and Harrow Street Pastors that assist rough sleepers. More information about their work can be found at <https://harrow.foodbank.org.uk/> and <https://streetpastors.org/locations/harrow/>

## **5. Single Homelessness**

Harrow Council works with partners in Harrow, West London and Pan London to ensure that existing services are fully used to prevent homelessness for single households who do not have a statutory priority need and those at imminent risk of rough sleeping.

Single homeless people are currently offered one housing solution, often outside London.

A self-help voucher scheme is given to single households to use in securing PRS accommodation.

Harrow Council is working to improve the service offered to single homeless (non-priority) households and to increase access to the PRS.

There is a serious shortage of Houses in Multiple Occupation (HMOs) in or near Harrow.

The Housing Benefit age criteria restriction for those aged under 35 years is a challenge amongst single person households for whom living in shared housing is not appropriate, as they are only entitled to the LHA shared room rate.

## **6. Meeting the Homelessness and Rough Sleeping Strategy objectives**

The objectives of the Homelessness and Rough Sleeping Strategy will be delivered through Harrow Council Housing Services' Smarter Housing Plan and Harrow Councils' Harrow Ambition Plan.

### **Objective 1: Preventing homelessness through advice, support and the use of personalised housing plans**

The first objective is to prevent homelessness through advice, support and the use of personalised housing plans.

The Council's in-house housing advice service is the main point of contact for most households at risk of homelessness. Information is also available online on the Council's website enabling service users to access information that is relevant, accurate and current, in line with the digitalisation of council services and the need for people to self-serve where they are able to. Voluntary and community sector partners such as Harrow Citizens Advice Bureau (CAB), SWISH and FirmFoundation also offer a range of housing and homelessness advice services

As demand for housing and homelessness services continue to grow, it is important to encourage and support self-help before people present become or are threatened with homelessness. Support services and self-help solutions offered include (as appropriate in the individual circumstances):

- Referral to work and training providers with a view to enhancing long-term income and acceptability as prospective tenants to landlords, including Xcite and Learn Harrow
- Debt and income maximization, budgeting advice and mortgage advice
- Benefit entitlement checks
- Referral to the West London Single Homeless Accommodation Scheme
- Identify voluntary and community organisations to assist with grant applications
- Shared ownership and other low cost home ownership and key worker scheme opportunities
- Voucher scheme for single homeless people
- Rent Bond through the Help2Let agency – removing a barrier that prevents homeless households accessing suitable private rented accommodation
- Sanctuary Scheme – enabling households threatened with homelessness due to domestic violence or hate crimes to remain safe in their current home
- Sheltered housing (both social rented and leasehold) for older people
- Supported housing for people with different support needs (learning disabilities, mental health, substance misuse)
- Family Mediation –working with families to resolve issues that lead to young people being unable to remain at home
- Referral to a floating support scheme to enable vulnerable customers to better sustain their tenancy
- Advice about grants available to provide better heating in a home that is too cold
- Information for parents about childcare schemes and financial assistance.

Where the Council is satisfied an applicant is eligible for assistance and homeless or threatened with homelessness it must make an assessment of an applicant's case.

We will produce a Personalised Housing Plan for an applicant if we find that they are homeless or threatened with homelessness in the next 56 days, and they are eligible for housing assistance. In the plan we will identify what help we can offer them, and what steps they should take themselves to prevent their homelessness or obtain other accommodation.

Harrow Council recognises that not everybody presenting as homeless requires a full assessment and many people will be signposted to other relevant services, or provided with information to facilitate self-help. However, where homeless households require support the Council will aim to meet these needs through a range of services.

Preventative housing related floating support and tenancy sustainment services for vulnerable households can help them sustain their existing tenancies and avoid the risk of homelessness but sustainable funding for these services is a challenge.

Affordability, money and debt are key issues for households facing the risk of homelessness. Through the Personalised Housing Plan, housing advisers will work with homeless applicants to identify how much households can afford to contribute to their housing costs from other household income, as well as Housing Benefit or Universal Credit. Housing advisers give basic financial and budgeting advice to households either presenting or accepted as homeless. Money and debt advice is important to mitigate the risk of homelessness due to welfare reforms and the overall benefit cap.

## **Objective 2: Reducing the number of households in temporary accommodation**

The second objective is to reduce the number of households in temporary accommodation.

Councils must secure emergency temporary accommodation for homeless households whilst their cases are assessed. The Council works sub-regionally to ensure that value for money in procuring temporary accommodation is achieved. Whilst the Council met the government's target to reduce temporary accommodation use by half in 2010, it has not been possible to maintain this level due to the impact of welfare reforms.

The Council continues to manage the use of temporary accommodation including working to reduce the use of short-term accommodation and to reduce the length of stay in temporary accommodation.

In order to reduce the use of short-term accommodation the council discharges or relieves homelessness into the PRS (where this is the suitable option), directly leases private rented sector properties and makes decisions on homelessness applications within the recommended timeframe likely to be set out in the Code of Guidance

In order to reduce the length of stay in temporary accommodation the Council explores housing options for non-dependent adults living in larger households in TA to help them to find their own independent housing solution, makes management bids for homeless households who are not actively bidding on LOCATA and secures economically realistic accommodation in the Private Rented Sector through the Help2Let agency's work with private sector landlords

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

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

social housing is allocated, by prioritising applicants who have a housing need in accordance with the local and reasonable preference categories.

#### Under Occupation scheme

The Council provides a range of incentives enabling under occupying households to move to more suitably sized accommodation and free up larger properties, and an under-occupation officer has been encouraging more moves and registrations. 46 households were incentivised to downsize within Council stock between April 2016 and June 2019, and a further 67 properties were freed-up through the Grants to Move Scheme that operated between 2013 and 2018. The incentive scheme is reviewed regularly to ensure that it maximises the numbers of moves that take place. Many under-occupiers have very specific preferences so this is scheme unlikely to achieve a high number of moves.

#### Social Tenancy Fraud Initiative

The use of social housing by those not entitled to it is not only fraudulent, but also deprives a household with a genuine housing need of a social rented home. The Council successfully recovered 8 properties from fraudulent use in 2018/2019. By Quarter 2 of 2019/2020 4 properties have been recovered so far and 3 fraudulent Right to Buy applications have been prevented.

#### Cross Borough Moves (Locata)

The Council works with other Locata partners (offering choice based lettings) across the sub region to achieve cross borough moves. We also help homeless households and those threatened with homelessness obtain social housing in other parts of the country through the HomeFinder scheme.

### **Objective 3: Helping people access economically realistic housing options**

The third objective is to help people access economically realistic housing options

The Housing Strategy identifies the importance of increasing the supply of affordable housing in Harrow, however historically Harrow has one of the lowest amounts of social housing in London. Given the current economic climate, the Council will need to ensure that all housing options are open to homeless households. With the supply for lettings of new and existing social rented housing predicted to decrease and unlikely to increase in the short to medium term, the Council will continue to work in partnership to deliver new affordable homes.

Alongside this, it will also need to manage the service users' expectations to ensure that access to economically realistic housing solutions are maximised. This will mean that housing options are more likely to be in the Private Rented Sector and outside of Harrow, rather than social rented housing in Harrow. Households wanting to remain in Harrow will need to increase their income to meet their housing costs or choose to live in a property that is smaller than they need. Housing Needs work in partnership with Xcite, the Council's employment service, and Learn Harrow, the adult education service, to support residents in this area. In taking this approach, the Council will continue to meet housing need, prevent homelessness and reduce the use of temporary accommodation.

The PRS in Harrow is now approximately twice the size of the social rented sector. Through a combination of government policy changes and pressures on social housing it is increasingly important as a source of accommodation for households in housing need. For many, this is their only realistic housing option in meeting need within a reasonable timeframe and, the Council has used the PRS both to prevent homelessness and also in

qualifying offers to end homelessness duties.

The shortfall of social rented housing and changes to welfare benefits mean that while Harrow Council will seek suitable PRS accommodation in the Borough, it may not be affordable in the long term for all households. The high demand and competition for lower quartile PRS accommodation means that accommodation further away from Harrow and London will increasingly be the only realistic option for low-income or households in receipt of welfare benefits.

The Homelessness (Suitability of Accommodation) Order 2012 (as amended by the Homelessness Reduction Act 2017) and the Housing Act 1996 lay the rules which local authorities must consider when discharging homelessness duties into the PRS. The Council assesses on a case by case basis and issues that the Council must take in to account include:

- The location of the accommodation offered is suitable for all members of the household and where the accommodation is outside Harrow, the distance of the accommodation to Harrow;
- the significance of any disruption caused by the location of the accommodation to the employment, caring responsibilities and education of the applicant or their household;
- The proximity and accessibility of the accommodation to medical facilities and other support current used by the applicant or a member of their household or are essential to the well-being of the same;
- Properties meet acceptable standards of condition and repair
- Tenancies granted are for the statutory minimum period and if the landlord has provided the Council with a copy of the tenancy agreement – the expectation is that most households can occupy the home for far longer as a permanent home.

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

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

The use of the PRS continues to be an important way of meeting the Council's homelessness obligations. The Council is committed to assisting households unable to resolve their housing difficulties with the help of advice or referral alone or by improving their ability to access suitable and economically realistic housing either within or outside the borough. It is equally committed to supporting landlords to ensure services meet their needs, such as the need to improve the condition of their stock.

The support package offered to landlords, through the Council's 'Help2Let' agency provides a range of services from tenant finding to full management services for landlords. The Council offers advice and assistance, floating support, quick lettings and better liaison with the Housing Benefits service to landlords working with the Help2let agency. The Council is looking to increase the number of Landlords it works with, as well as at opportunities to contract Help2Let's services to provide advice and assistance where social landlords will not renew a fixed term tenancy.

The Council's preference for an enabling approach towards landlords allows households to remain in their PRS accommodation. Landlord Forums hosted by the Council are important opportunities for consultation and engagement with landlords.

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

#### Access to Home ownership

The Council works with Housing Association partners and the GLA to offer low cost home ownership products. Households not entitled to assistance under Homelessness duties or not able to buy a suitable home on the open market may be entitled to support under the GLA's scheme. In Harrow, priority for the schemes is given to groups under the criteria set out in the Mayor's First Steps scheme. Details of the GLA's scheme can be found at [www.shareto-buy.com](http://www.shareto-buy.com)

#### **Objective 4: Providing extra help with housing advice and options to vulnerable groups**

The fourth objective is to provide extra help with housing advice and options to vulnerable groups.

Many people can become homeless or be threatened with homelessness because of a specific support need or complex needs. There can be many reasons for this and by identifying support needs we can prevent homelessness through targeted and specialist support.

People with low to medium support needs may be able to access the private rented sector to meet their housing needs, while some will be able to access social housing.

The Council commissions floating support services to support vulnerable residents settle into and maintain their tenancies and homes. There are generic and specialist support services available, though there are fewer services than in previous years due to changes in funding. Homeless households with support needs are provided with advice and support on their housing options, benefits entitlements and any other issues connected to housing. Work has also been undertaken by Harrow Council and local partners to address hoarding and support residents who engage in hoarding behaviours.

Homelessness amongst older people is low and the Council will continue to provide appropriate support and services to ensure that this continues. The 17 Council sheltered schemes and 17 Registered Provider sheltered housing schemes for older people in Harrow help to meet housing need from this client group.

The Council is committed to addressing the needs of other vulnerable groups including victims of domestic abuse, people with substance misuse issues and ex-offenders.

Supported Housing may be available in Harrow or further away for specific groups such as people with mental health needs, people with learning disabilities and older people with support needs. The referral routes vary but referrals are often made through Adult Social Care.

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

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

Housing and Children's Services operate successfully under a protocol covering the provision of accommodation and support for homeless 16 and 17 year olds.

Harrow Council's Children's Services publishes the Harrow Children's Pledge and the Harrow Careleavers Charter (for 16 to 25 year olds) which outline the Council's commitment to assisting children in care and care leavers with their housing needs.

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

### **Objective 5: Supporting rough sleepers to find housing solutions and access other key services**

The fifth objective is to supporting rough sleepers to find housing solutions and access other services such as health, benefits, education and employment

Historically, recorded rough sleeper numbers in Harrow has been low and in the 2018 annual count of rough sleepers an estimated 13 rough sleepers were returned. This annual rough sleeping assessment in November showed an increase in rough sleeping but may mask higher numbers of single non-priority 'sofa surfers' or hidden homeless. The CHAIN data recorded 33 rough sleepers in 2017/2018. We estimate during the course of a year 100 or more people could spend one or more nights as street homeless in Harrow.

Local charities support rough sleepers in accessing local services such as a GP, Job Centre Plus, mental health care, drug and alcohol services and where possible help to find long term accommodation.

Harrow Council has had no specific services for rough sleepers but recent external funding has meant that dedicated services can now be established.

Harrow Council will continue to work with local and West London partners to provide services to prevent and address rough sleeping.

### **Objective 6: Communicating key homelessness messages to residents and professionals**

The sixth objective is to tell residents, professionals and elected members about current housing demand and supply issues and challenging myths about access to social housing as well as telling concerned members of the public how they can help rough sleepers.

Housing Services deliver briefings to colleagues, professionals and elected members to provide up to date information about housing and homelessness to ensure that correct information is disseminated to residents.

The key messages include:

- Harrow has a small social housing stock.

- Homelessness is not a route to securing social housing in Harrow.
- We are likely to discharge/end our duty with an offer of a permanent housing solution in the private rented sector.
- Most homeless families won't be able to afford accommodation locally.
- If you want to stay locally you may need to increase your income or choose to live in a smaller home.
- If you are at risk of losing your home call Housing Advice immediately on 020 8424 1093.
- If you are working with a homeless family please speak to Housing Needs about any housing concerns for up to date and correct information and advice.

Members of the public are often concerned about rough sleepers, particularly in very cold and very hot weather. We communicate information about the council's out of hours service, Street Link and the SWEP so that members of the public can report concerns to the appropriate service.

Key communication priorities relating to homelessness and rough sleeping form part of the Housing Services Communication Plan.

### **Partnership working**

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

Internally a Homelessness Task Force operates to consider and address homelessness and rough sleeping across all council departments.

The Council works with partners across Harrow, West London and London to address homelessness and rough sleeping, including FirmFoundation, West London Alliance, West London Housing Partnership, Street Link, St Mungo's, London Councils and the Greater London Authority, as well as national partners such as MHCLG.

### **Homelessness Reduction Boards**

The MHCLG consultation 'Tackling homelessness together: A consultation on structures that support partnership working and accountability in homelessness' (February 2019) outlined the government's proposal to require local authorities to convene Homelessness Reduction Boards that would be responsible for tackling homelessness in the local area. The boards would be forums made up of relevant local delivery partners, ensure a strategic and coordinated approach to reducing homelessness and identify and deliver the services and interventions to meet agreed objectives and outcomes. We await the outcome of this consultation.

### **Equality and diversity**

An Equalities Impact Assessment has been completed on this Homelessness & Rough Sleeping Strategy, taking into account the evidence base and the consultation outcomes.

### **Review**

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



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

### **Homelessness Accommodation Selection Policy**

#### **1. Introduction**

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

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

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

The lack of affordable housing and impact of the on-going welfare reforms mean that it is challenging to procure sufficient affordable accommodation locally and some households will need to move out of Harrow or out of London.

#### **2. Objectives**

The objectives of the Homelessness Accommodation Selection Policy are to:

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

#### **3. Responsibilities**

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

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

In its Judgment in *Nzolameso v City of Westminster* (2015) the Supreme Court stated that local authorities should ideally have, and keep up to date, policies for procuring sufficient temporary accommodation units to meet anticipated demand, and a policy for allocating these to individual homeless households. The Council's creation of a Homelessness Accommodation Selection Policy aims to meet this objective.

This Policy takes into account the Council's statutory obligations under the Housing Act 1996, as amended by the HRA 2017, the Children Act 2004 and the Homelessness Act 2002.

The Council aims to procure and allocate accommodation that meets the standards set out in the Homelessness (Suitability of Accommodation) (England) Order 2012 as amended by the HRA 2017 and meet the requirements of S149 of the Equalities Act 2010 which refers to the Public Sector Equality Duty placed on local authorities.

## **5. Policy**

### **5.1 Allocation of accommodation**

When allocating accommodation under this Policy:

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

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

#### Priority for Local (Category A) Accommodation

- a) Families who have a child or children with particular educational needs that can only be met locally at their existing school or college, such as a child who is in key stages of education in years 11 or 13 (and in some cases years 10 and 12, depending on the curriculum) and due to take exams; or who have a Statement of Special Educational Needs (SEN) or Education Healthcare Plan (EHC Plan) that cannot be transferred or similar services obtained elsewhere; or who have other exceptional educational needs;
- b) Families where one or more family members are in employment and similar employment is not available in another area where they could be accommodated or

who could not commute within a reasonable time and at an affordable cost to their existing employment from another area where they could be accommodated;

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

Local (category A) accommodation includes accommodation in Harrow and nearby in neighbouring boroughs of Watford, Barnet, Brent, Ealing, Hillingdon and Three Rivers.

#### Priority for Intermediate (category B) Accommodation

This includes accommodation located elsewhere in Greater London, and up to around 35 miles North West of Harrow or travelling time of up to about 1 hour 30minutes.

This accommodation will be prioritized for other households who can demonstrate a need for regular access to Harrow (or for Harrow residents to be able to regularly visit the applicants) but who do not have a priority for local category A accommodation.

#### Other (category C) accommodation outside London such as the Midlands

This is accommodation further away than that outlined above in categories A and B.

This accommodation will usually be provided to all other applicants without a priority for category A or B accommodation.

In line with the Children Act 2004 the needs of the children are considered. Generally, even if accommodation is located in a different area, if it is suitably sized self-contained affordable accommodation it will promote the welfare of a child better than smaller accommodation that significantly reduces the family's resources.

Homeless Applicants will be notified in their Personalised Housing Plan which location (Category A, B or C) that they are likely to be offered if they are likely to be in priority need requiring accommodation. This is to ensure at the earliest opportunity an applicant understands what help may be available, so he/she can make appropriate decisions about their housing options. The category will be indicated in the Plan as part of the steps the Local authority will take and an applicant can therefore request a review of the category. The Plan itself is also periodically reviewed and may be updated, so the category included in the plan may change.

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

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

1. Those who are in shared accommodation and are owed a duty under S193
2. Those who need to move because their current S193 accommodation is unsuitable
3. Those who have waited longest in shared B&B accommodation and would likely be assessed as unintentionally homeless
4. Those who will shortly become homeless, would need to be offered s188 accommodation, and would likely be assessed as unintentionally homeless
5. Those who have been accommodated under s193 duty and will shortly become unintentionally homeless from that accommodation
6. Other families in s193 accommodation in order to end their homelessness and the homelessness duty
7. Other families in s193 accommodation to make best use of the limited supply of accommodation that we have.
8. Other applicants to whom the council has a duty to offer accommodation; and if supply and resources allow, accommodation may be offered to homeless applicants where an accommodation duty does not exist.

Offers of private rented accommodation will usually be made as a final offer during the relief duty and when we make such an offer to applicants in temporary accommodation under S193 duty it will be made as a private rented sector offer (PRSO).

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

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

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

## 5.2 Size of accommodation

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

### 5.3 Offer of accommodation

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

### 5.4 Right to review

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

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

### 5.5 Exceptions to this policy

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

## **6. Equality and diversity**

An Equalities Impact Assessment has been completed on the Homelessness & Rough Sleeping Strategy (incorporating this Homelessness Accommodation Selection Policy), taking into account the evidence base and the consultation outcomes.

## **7. Staff training**

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

## **8. Publicity**

The Homelessness Accommodation Selection Policy will be made available publicly.

## **9. Review**

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

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

### **Homelessness Accommodation Procurement Strategy**

#### **1. Introduction**

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

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

#### **2. Objectives**

The objectives of the Homelessness Accommodation Procurement Strategy are to:

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

#### **3. Responsibilities**

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

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

In its Judgment in *Nzolameso v City of Westminster* (2015) the Supreme Court stated that local authorities should ideally have, and keep up to date, policies for procuring sufficient temporary accommodation units to meet anticipated demand, and a policy for allocating these to individual homeless households. The Council's creation of a Homelessness Accommodation Procurement Strategy aims to meet this objective. The Homelessness Accommodation Procurement Strategy takes into account the Council's statutory obligations under the Housing Act 1996 (as amended by the Homelessness Reduction Act 2017), the Children Act 2004 and the Homelessness Act 2002.

The Council will aim to procure accommodation that meets the standards set out in the Homelessness (Suitability of Accommodation) (England) Order 2012 (as amended by the Homelessness Reduction Act 2017) and meet the requirements of S149 of the Equalities Act 2010 which refers to the Public Sector Equality Duty placed on local authorities.

## 5. Strategy

### 5.1 Forecast of demand

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

The Council aims to facilitate or procure 600 units of accommodation for use as self-contained longer term or permanent accommodation over each of the years 1st April 2020 to 31<sup>st</sup> March 2021 and the subsequent 2 years. Any change to procurement numbers will be agreed with the Portfolio Holder for Housing.

### 5.2 Procurement Plan

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

<b>Accommodation</b>	<b>Number of units</b>	<b>Local</b>
Private Sector Leasing (PSL) Housing Association Leasing (HALS) and Private Rented properties (on Assured Shorthold Tenancy) managed by the council with guaranteed rent Total net increase	130	Y
Nominations to Assured Shorthold Tenancies (managed by landlord)	65	Y
Nominations to Assured Shorthold Tenancies (outside of local area e.g. Home Counties and Midlands)	80	N

Harrow Council Housing used as Homelessness Accommodation (non-secure tenancy)	50	Y
Securing tenancies for households who have identified their own accommodation (this may include offering Insurance for Deposits, and/or against Arrears)	215	Estimate 75% local, but applicant's choice
Purchasing or developing properties for use as temporary accommodation (local)	25	Y
Social Housing outside London (HomeFinder)	35	N

These targets are subject to refinement as the market changes.

### 5.3 Inter Borough Accommodation Agreement (IBAA)

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

### 5.4 Accommodation standards

We aim to procure temporary accommodation that we believe meets the standards set out in the Homelessness (Suitability of Accommodation) (England) Order 2012, as amended by the HRA 2017:

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



Where accommodation is managed by a private landlord or agent, we will ensure that if the property falls within a selective licensing area that the landlord has a license. If a license is not required we will encourage the landlord to join an approved accreditation scheme, if they are not already accredited.

#### **5.5 Emergency Accommodation**

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

### **6. Equality and diversity**

An Equalities Impact Assessment has been completed on the Homelessness & Rough Sleeping Strategy (incorporating this Homelessness Accommodation Procurement Strategy), taking into account the evidence base and the consultation outcomes.

### **7. Staff training**

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

### **8. Publicity**

The Homelessness Accommodation Procurement Strategy will be made available publicly.

### **9. Review**

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

## Appendix 3: Prevention or Relief Assistance Policy

### Prevention or Relief Assistance Policy

#### 1. Introduction

The purpose of this Policy is to set out how the Council will assist different categories of applicants owed the Prevention and/or Relief Duty under Part VII Housing Act 1996 as amended by the Homelessness Reduction Act 2017 (HRA 2017). Those duties only apply if the Council is satisfied that the applicant is homeless or threatened with homelessness within 56 days and eligible for assistance. The HRA 2017 requires that the authority must **take reasonable steps** to help the applicant to secure that accommodation does not cease to be available for their occupation or **take reasonable steps** to help the applicant secure accommodation for their occupation that is likely to be available for at least 6 months.

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

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

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

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

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

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

#### 2. Assistance during the Prevention Duty

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

Help that may be available for families with dependent children:

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

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

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

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

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

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

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

Help that may be available for families with dependent children:

- Contribution towards deposit, rent in advance & Admin fees, if appropriate
- Negotiations with prospective landlords
- Information, advice and training session on the Private Rented Sector (PRS) and obtaining accommodation
- Possible payment to friend or family who can provide housing for a while
- Emergency accommodation pursuant to S188 Housing Act 1996
- Resettlement support, if needed
- Possible offer of AST or other longer term private sector housing
- Employment advice or assistance
- Budgeting advice.

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

- Contribution towards deposit, rent in advance & Admin fees, if appropriate
- Negotiation with prospective landlords
- Information, advice and training session on the Private Rented Sector (PRS) and obtaining accommodation
- Possible payment to friend or family who can house for a while
- Emergency accommodation. S188 Housing Act 1996
- Resettlement support, if needed
- Possible offer of AST or other longer term private sector housing- may be shared accommodation
- Possible sheltered social housing, if appropriate
- Employment advice or assistance
- Budgeting advice.

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

- Voucher, subject to resources- currently £500 payable to a landlord who provides the applicant with a suitable tenancy
- Discussion/negotiation with friend or family who may be able to accommodate
- Employment advice
- Information, advice and training session on the Private Rented Sector (PRS) and obtaining accommodation
- Possible room in shared housing if street homeless, but unlikely to be local.

Help available to Rough Sleepers

- A caseworker to assist in finding an accommodation solution and other bespoke support to move off the streets

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

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

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

The Policy sets out the Council's approach in complying with its duties pursuant to Part VII Housing Act 1996, as amended.

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

There is a right to review the reasonable steps offered by the Council under s.202 of the Housing Act 1996 as amended.

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

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

## **8. Equality and diversity**

An Equalities Impact Assessment has been completed on the Homelessness & Rough Sleeping Strategy (incorporating the appendices), taking into account the evidence base and the consultation outcomes.

## **9. Publicity**

This Policy will be made available publicly.

## **10. Review**

A review of this policy will take place when the Homelessness Strategy is reviewed, or earlier if legislation or the nature of homelessness changes significantly.

## **Appendix 4: Statutory duties Housing Act 1996 Part VII**

The duties in Part VII Housing Act 1996 have been amended and extended by the Homelessness Reduction Act 2017 (HRA 2017).

### **Duties**

Under the Housing Act 1996, a homeless application will have to be taken if local authorities have reason to believe that the customer may be homeless or threatened with homelessness such that it is likely they will become homeless within 56 days. There is a requirement to provide interim accommodation, pending investigations, if there is reason to believe that the customer may be homeless, eligible for assistance and have a priority need.

### **Homelessness framework**

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

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

- **Eligibility**

A person is eligible for assistance if:

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

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

- **Homeless criteria**

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

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

- living in very overcrowded or unsanitary conditions.

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

- **Priority need**

Priority need is the term the Housing Act 1996 (defined in section s.189) uses to define types of people who may be considered vulnerable in relation to homelessness. If a homeless person is classed as having a priority need then they may be owed certain duties by the Council. A person will normally have a priority need if they

- have dependent children living with them or might reasonably be expected to live with them;
- have been made homeless by an emergency such as a fire, flood or other disaster,;
- are aged 16 or 17 who is not a 'relevant child' or a child in need to whom the Council owes a duty under s20 of the Children Act 1989 (social services may also have a duty to accommodate and support);
- are pregnant or a person with whom she resides or might reasonably be expected to reside;
- are a care leaver who is under the age of 21;
- are vulnerable (more vulnerable than the average street homeless person).

Reasons why a person may be classed as vulnerable include:

- have had to leave their home due to violence or threats of violence from another person which are likely to be carried out;
- are an older person, have mental illness, have a physical or learning disability or physical disability or other special reason, or with whom such a person resides or might reasonably be expected to reside,;
- have been in care, a young offender's institution, prison or the armed forces.

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

- **Intentionally homeless**

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

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

- **Local connection**

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

## Homeless priority decision

Following these investigations the Council must put its findings, in writing, to the customer. If the Council accepts that a person is eligible for help, in priority need and has not made themselves intentionally homeless, then there is a duty to find them accommodation.

This is often called the “main duty”. They are entitled to a priority on the Council’s housing register, recognising the fact that they are homeless and vulnerable, giving them priority in the **Allocations Scheme**. In addition the Council will provide temporary accommodation, if required, while longer term accommodation is being sought. The duty is discharged with the following:

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

If the customer is dissatisfied with decisions regarding his homelessness application they usually have a right to have the decision reviewed.

## Review and appeal process

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

The reviewing officer will contact the customer or his/her representative to identify themselves as the reviewing officer and providing an outline of the process of review, including timescales for providing any further submissions and the date the review decision is due. The applicant will be offered the opportunity to make oral representations if they wish. The review process must be completed within 8 weeks unless both parties agree to an extension. The reviewing officer will consider all the information before them and inform the customer of their findings in writing.

The reviewer can uphold, quash or overturn the original decision. If the applicant believes there is an error in law they may apply, within 21 days of receiving the decision, to the County Court for an appeal of the reviewing officer’s decision.

**The HRA 2017 amended the duties under the Housing Act 1996. This is a summary of the main changes and is not a definitive explanation of the Act.**

<b>Previous Duties: Housing Act 1996 (as amended by the <u>Homelessness Act (2002)</u>)</b>	<b>New or amended duties: <u>Homelessness Reduction Act 2017</u> (in force from 3<sup>rd</sup> April 2018)</b>
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<p>A duty to help someone who is homeless or threatened with homelessness within 28 days. A duty to prevent homelessness for people considered to be in priority need</p>	<p>A duty to help someone who is homeless or threatened with homelessness such that they are likely they will become homeless within 56 days. A new duty to assist an applicant in preventing or relieving their homelessness for all eligible applicants threatened with homelessness within 56 days, regardless of priority need</p>
	<p>A new duty on public services to notify a local authority if they come into contact with someone they think may be homeless or at risk of becoming homeless. This was brought in to force in two parts in February and April 2018.</p>
<p>Duty to secure that advice and information about homelessness and prevention of homelessness is available free of charge to any person in the district</p>	<p>Duty to provide or secure the provision of a service, available free of charge to any person in the authority's district, providing information and advice on preventing homelessness, and/or securing accommodation when homeless</p>
<p>General duty to provide advice and assistance</p>	<p>Duty to assess all eligible applicants' circumstances and agree or produce a personalised housing plan. This will include any steps the applicant is required to take in order to secure or retain accommodation and the assistance the council can offer. The plan should be kept under review until the council has decided a duty is no longer owed</p>
<p>Duty to provide interim accommodation where a person is eligible, homeless and in priority need, whilst assessment of duties owed is undertaken.</p>	<p>Duty to provide interim accommodation where a person is eligible, homeless and in priority need, whilst assessment of duties owed is undertaken and during the relief duty. Relief duty: The authority must take reasonable steps to help all eligible applicants to secure for themselves suitable accommodation available for at least six months.</p>
<p>Rights to review on decisions</p>	<p>Right to review on existing decisions and some review rights on new duties</p>

## Version History

<b>Summary of changes</b>	<b>Date of issue</b>	<b>Version</b>
Approved by Cabinet	14/11/2019	1.0
Error removed ('Guidelines recommend that this process take no more than 33 days, although this may take longer depending on the nature of the enquiries')	09/03/2020	1.1