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**Resources Department
Town Hall, Upper Street, London, N1 2UD**

AGENDA FOR THE HOUSING SCRUTINY COMMITTEE

Members of the Housing Scrutiny Committee are summoned to Council Chamber, Town Hall, Upper Street, N1 2UD on, **6 February 2024 at 7.30 pm.**

Enquiries to : Ola Adeoye
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Despatched : 29 January 2024

Membership

Councillor Jason Jackson (Chair)
Councillor Ilkay Cinko-Oner (Vice-Chair)
Councillor Phil Graham
Councillor Valerie Bossman-Quarshie
Councillor Michael O'Sullivan
Councillor Mick Gilgunn
Councillor Gulcin Ozdemir
Councillor Ernestas Jegorovas-Armstrong
Dean Donaghey (Resident Observer) (Co-Optee)
Rose Marie McDonald (Resident Observer) (Co-Optee)

Substitute Members

Councillor Jilani Chowdhury
Councillor Ben Mackmurdie
Councillor Heather Staff
Councillor Rosaline Ogunro
Councillor Caroline Russell
Councillor Marian Spall
Councillor Dave Poyser

Quorum is 4 Councillors

A.	Formal Matters	Page
1.	Apologies for Absence	
2.	Declaration of Substitute Members	
3.	Declarations of Interests	
4.	Minutes of Previous Meeting	1 - 2
5.	Chair's Report	
6.	External Attendees (if any)	
7.	Order of Business	
8.	Public Questions	
B.	Items for Decision/Discussion	Page
1.	Main Scrutiny Review 2023/24 - New Build Homes - Witness Evidence - Presentation To Follow	
2.	Housing Scrutiny Committee Strategic Review of Overcrowding and Under-Occupation progress report.	3 - 8
3.	Housing Ombudsman Paragraph 49 Investigation and Action Plan	9 - 20
4.	New Temporary Accommodation Framework	21 - 66
5.	Work Programme 2023/2024	67 - 68
C.	Urgent non-exempt items (if any)	Page
D.	Exclusion of press and public	Page
E.	Confidential/exempt items	Page
F.	Urgent exempt items (if any)	Page

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Agenda Item 4

London Borough of Islington

CommitteeName - MeetingDate

Minutes of the meeting of the CommitteeName held at MeetingLocation on MeetingDate at MeetingTime.

Present: **Councillors:** MembersPresentShortRolesSubsList

ChairPresentList in the Chair

The meeting ended at MeetingActualFinishTime

CHAIR

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Agenda Item B2

Recommendation Number	Housing Scrutiny recommendations from the overcrowding strategic review 2023/2024	Actions/Progress	RAG rating
1	Housing Services to undertake a comprehensive Tenancy and welfare audit of all its housing stock with a view of identifying overcrowding, under occupiers, and victims of domestic abuse etc. this is currently being trialled in Halton Mansions	Pilots completed, with evaluation completed and attached to this report. These audits to commence once the Housing management restructure is in place.	Amber
2	Committee recommend that Housing Services rigorously promote issues around existing incentives for under occupiers such as mutual exchanges, that financial incentives be reviewed, - The downsizing scheme to receive a comprehensive review and the outcome of this review to be reported to the November 2023, Housing Scrutiny Committee. The council will also conduct regular sessions/ briefings/community drop-in sessions to promote downsizing and mutual exchanges to address overcrowding	Review completed as part of the strategic review and incentive payments increased, plus the housing allocations scheme changed to promote estate under-occupied moves and one additional officer to be appointed. The new housing allocations scheme to be launched April 2024. Recruitment to the additional position commenced. Increase in incentive payments and new promotion material to be launched March 2024 Drop ins to promote the under-occupation scheme planned for Spring 2024 and on-going	Amber
3	Complete review of the housing allocation scheme by making sure we are addressing that needs	Completed and approved on the 20 th of July 2023 Executive meeting.	Green

	as it is clear that there are thousands of people who are living in overcrowded accommodation but not on the housing register - what fits on the local estate or local community		
4	Council will build larger 4–5-bedroom accommodation	Discussion continuing with the new build team to prioritise the development of 4- and 5-bedroom properties. The purchase of ex right to buy properties to also focus on the purchase of 4- and 5-bedroom properties. Since the 19 th of October 2023, when the Executive approved the ex-right to buy property purchase programme 4 x 4 ex right to buy properties have been purchased or exchange conducted.	Amber
5	Working with the GLA to try and develop /design a scheme that allows LA to access funds because at the moment it is possible to buy properties to accommodate people from Afghanistan and Ukraine but there is no grant that helps addressing overcrowding residents and rehousing them.	Discussions on-going	Amber
6	Adopt a communication plan across the council, i.e., children services - simple tips on how to address overcrowding	It is aimed this communications plan will commence from February 2024, with the support of the Corporate Communications team.	Amber

6	Committee should consider reviewing its tall building policy, in the long term – not just building on existing top of roof tops	On-going communications continuing with all departments across the council and progress to be reported during May 2024.	Amber
8	Increase in supply of 4- and 5-bedroom properties for families in need of larger homes using all means possible	The promotion of the under-occupation scheme to commence in March 2024. The promotion of the purchase of ex right to buy 4- and 5-bedroom properties conducted in November 2023. Drop-in sessions to focus on under-occupation moves planned for the Spring 2024.	Amber
9	Collaborating more with community groups to promote advocacy services within all communities, to enable all sections of society to benefit from the council's positive work in this area	Partnership newsletter produced for all partner and community groups. Promotion material to be provided to all community and partner agencies in March 2024. Council wide community newsletter to focus on under-occupation incentives and helping hand framework to move from the Spring 2024.	Green
10	Explore alternative schemes – GLA, seaside and community home scheme for those over fifty-five	This work is on-going and promoted to all residents overcrowded and under-occupying Islington Council and Housing Association homes.	Amber
11	Council in its partnership with RSL's assist in identifying more voids /abandoned homes	This has been promoted with the new Housing Association partnership	Green

		agreement and discussed at the Housing Association liaison meetings.	
12	As statutory overcrowding is difficult to address, the Council lobby and liaise with GLA on redefining the Overcrowding standards as they are long overdue for a change.	These discussions are continuing.	Amber
13	Council should address issues of language barriers as this may hinder under occupiers' residents and especially those who do not engage in mutual swaps	Partnership work with all community based voluntary sector and faith organisations are continuing. Community language translation services offered to all residents.	Green
14	In response to evidence from Islington law centre, indicated that Islington residents do not meet the council's adverse threshold to bid for larger properties. – Conduct detailed annual analysis for those accommodated through the Choice Based Lettings scheme and amend policies accordingly to ensure overcrowded households are rehoused as an equal proportion of those on the housing register.	Analysis to be completed for the 2023/2024 financial years activities and the results presented to the Housing Scrutiny committee in June 2024.	Amber
15	When a void property which is a 3-, 4- or 5-bedroom property these properties should be fast tracked through the voids process	Void performance to be reported to the April 2024 Housing Scrutiny committee as agreed at the February 2024 Housing Scrutiny Committee	Amber
16	Undertake right size	This to be launched	Amber

	moves on our estates to promote a series of chain lettings to increase lettings locally and reduce overcrowding.	in April 2024 when the new housing allocations scheme approved on the 20 th of July 2023 Executive meeting will be launched.	
17	During the community drop-in sessions, the council seeks the views of residents on how to improve services to people who are overcrowded, or under-occupying properties and the council then produces policies and procedures considering this feedback	This was completed at the 2023 60 Community Drop-in sessions, and this will continue going forward with the results of this work considered at the November 2024 Housing Scrutiny Committee.	Green
18	The council empowers residents through the resident empowerment framework to help the council to develop new ways of working to address overcrowding.	On-going and to be promoted through the tenancy audit work, community drop in work and the resident's empowerment framework.	Amber
19	The council designs a seamless service offer between Health, Adult Social Care, Housing, and Children's services to ensure we address overcrowding, damp and mould, education attainment and health improvements for people living in overcrowded households	Regular liaison meetings conducted with Housing, Adult Social Care, Health, Children's services now taking place to promote positive partnership work and outcomes.	Green
20	The council develops data platforms across the council to capture a holistic approach to benefit residents who are overcrowded, and this ensures services are developed using this data and empowering residents	Working with Adult Social Care and Health to develop this platform. Progress to be reported to the Housing Scrutiny Committee in the summer of 2024.	Amber

	to influence the way we work.		
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Homes and Neighbourhoods Directorate
222 Upper Street, N1 1XR

Report of: Ian Swift, Director of Housing Operations

Meeting of: Housing Scrutiny Committee

Date: 6th February 2024

Ward(s): All electoral wards

Subject: Housing Ombudsman Paragraph 49 Investigation Update

1. Synopsis

- 1.1. The aim of this report is to provide the Housing Scrutiny Committee with an update on outcomes of the Housing Ombudsman paragraph 49 investigation into Islington Council, which concluded, and report published in October 2023.
- 1.2. The Housing Ombudsman made 21 recommendations in the special report on Islington Council.
- 1.3. An action plan has been created to address all 21 recommendations, as set out in the Housing Scrutiny Committee report presented to committee on 8th January 2024.
- 1.4. The Homes and Neighbourhoods service has recently met with the Housing Ombudsman as part of the investigation monitoring process.

2. Recommendations

- 2.1. For the Housing Scrutiny Committee to note this update and progress made against the next steps following the paragraph 49 investigation.
- 2.2. To approve that the report of updates related to the investigation, action plan and updates from the Housing Ombudsman are provided at quarterly Housing Scrutiny Committee meetings in 2024.

3. Update

- 3.1. The Acting Corporate Director Homes and Neighbourhoods and Head of Integrated Services met with representatives of the Housing Ombudsman and the investigation leads on Monday 15th January 2024.
- 3.2. The current version of the action plan (appendix 1.) was presented and sent to the Housing Ombudsman, including additional supporting documentation, as agreed during the 15th of January 2024 meeting.
- 3.3. The Homes and Neighbourhoods service is awaiting feedback from the Housing Ombudsman on the current version of the action plan and confirmation of timelines for the monitoring period.
- 3.4. The Homes and Neighbourhoods service is confident we will address all 21 recommendations with specific, measurable, achievable, realistic and time-based actions.
- 3.5. The service is using the Housing Ombudsman special investigation report to ensure the best services are offered to Islington Council residents and will be the best housing service in the country in the next two years.

4. Implications

4.1. Financial Implications

- 4.1.1. There are no financial implications and the costs for this work will be incorporated within existing budgets.

4.2. Legal Implications

- 4.2.1. There are no known Legal Implications associated with this report.

5. Reasons for recommendations

- 5.1. To ensure appropriate and transparent governance.

6. Appendix

- 6.1. HO Action Plan - 20231220

Homes & Neighbourhoods - Housing Ombudsman Action Plan

Ref	Objective	Measure	Action	SRO	Priority	Status	Start Date	Due Date	RAG	Link to Key Plan (Origin)
HO1	Rec 1 - Take a consistently SMART approach to improvement measures, using active language to plan and to drive accountability, with regular oversight from senior staff.	Confirmation that all live action plans have been updated and that SIB are overseeing Departmental Action Plan. Work SRO identified on Departmental Improvement Plan	All action plans to be implemented using SMART methodology and overseen by Service Improvement Board. Reporting on progress to Housing Scrutiny Committee. Progress against plan being overseen by Service Improvement Board	Hannah Bowman	High	In Progress	01/11/23	31/01/24	Green	Housing Ombudsman Report Action Plan
HO2	Rec 2 - Enable and empower services to work together effectively, both internally and with external agencies. This should include allocating ownership of cross departmental issues, to co-ordinate the investigation and analyse the issue before planning the most effective response.	See an improvement in the confidence of staff to resolve issues and feel empowered in their roles.	Departmental practice of allocating a Senior Responsible Officer for all significant improvement projects – who is responsible for strategic ownership and ensuring buy in from all services.	Hannah Bowman	High	Complete	01/11/23	31/12/23	Green	Housing Ombudsman Report Action Plan
HO3		See a reduction in complaints that involve cross team issues.	To undertake a pulse survey in January 2024, for all officers across the Homes and Neighbourhoods service led by Human Resources to produce an action plan to promote empowerment, autonomy and promoting a coaching environment. Undertake a follow on survey in June 2024 - mapping increases in confidence in staff and empowerment to resolve issues.	HMT	High	In Progress	01/11/23	28/02/24	Green	Housing Ombudsman Report Action Plan
HO4	Rec 3 - Improve the quality of the investigations into service requests carried out by its staff or contractors to address the failings identified in this report.	Reduction in complaints escalating through the complaints process.	Actions meeting this requirement are contained within this plan at points: [ADD LIST OF ACTION POINTS] HO7, HO9, HO10, HO11, HO13, HO16, HO21,HO22, HO23,HO25, HO36, HO48, HO55, HO88 - 93, H99, H100	Ian Swift	High	In Progress	See relevant actions for details	See relevant actions for details	Green	Housing Ombudsman Report Action Plan
HO5	Rec 4 - Train its staff and its contractors on how to communicate clearly and appropriately with residents about who will do what, why, and when.	Monitor all required staff have attended the training.	Develop a programme of communications training offer for Frontline staff and managers.	Hannah Bowman	High	In Progress	01/12/23	31/03/24	Green	Housing Ombudsman Report Action Plan
HO6		See a downward trend in the number of complaints involving communication failure, using new trend reporting available from our new complaints management system.	Deliver a compulsory training programme with staff to attend identified by each service. Setting out clear standards for communicating, the need to adapt communication to the needs of the resident, agreeing a lead	Hannah Bowman	High	In Progress	01/12/23	30/11/24	Green	Housing Ombudsman Report Action Plan
HO7		Ensure all e-learning Housing Ombudsman training is undertaken by all front-line officers and the Leaders of each service area across the Homes and Neighbourhood service	Ensure that contractors are providing suitable communications training to staff.	Mike Hall	High	In Progress	23/11/23	31/01/24	Amber	Housing Ombudsman Report Action Plan

HO8	Rec 5 - Put in place formal procedures for proactive managerial oversight of record keeping designed to ensure records are complete and accurate, and stored in the correct place.	Procedure in place, which has been tested and reviewed by frontline managers.	Develop a simple procedure for record keeping for all key areas of service – setting the standard for the department and an audit form for team leaders to use to ensure staff are implementing the form (procedure) and a framework document to be completed by each service to provide assurance to the Service Director of the services arrangements.	Ian Swift	High	In Progress	11/12/23	29/02/24	Green	Housing Ombudsman Report Action Plan
HO9		Evidence shared of audit activity with next line managers.	Managers to audit notes taken by staff members and feedback on quality and quantity to staff as part of the monthly check-in process. Measuring staff against the procedure.	Matt West/Ian Swift	High	In Progress	01/04/24	31/05/24	Green	Housing Ombudsman Report Action Plan
HO10		Audit to be carried out by service delivery teams (tenancy services, repairs & HD, legal disrepair) management structure – to check impact of system and that information is reliably recorded.	Housing Ombudsman Knowledge and Information Management training made mandatory for managers and recommended for staff	Ian Swift	High	In Progress	01/11/23	31/4/24	Green	Housing Ombudsman Report Action Plan
HO11		New IT system to enable analysis of complaints and show trends in this area	Include the importance of record keeping as part of the communications training. Ensure contractors have adequate training in place for this too.	Ian Swift	High	In Progress	01/12/23	30/11/24	Green	Housing Ombudsman Report Action Plan
HO12		New IT system in place with the required functionality	Include record keeping failures in quarterly complaints reports and alert service managers where trend identified within a specific team.	Hannah Bowman	High	In Progress	02/01/24	31/01/24	Green	Housing Ombudsman Report Action Plan
HO13		Audit outcome show clear improvement of recording.	Ensure the new single view IT system for Homes and Neighbourhood addresses the findings of the Housing Ombudsman for all management of records and data.	Ian Swift	High	In Progress	01/01/24	TBC	Green	Housing Ombudsman Report Action Plan
HO14		Improvement in record keeping evidenced through audit process and overseen by the Group Leaders meetings.	Undertake spot audits of our ASB and tenancy management records, including listening to call recordings.	Ian Swift	High	In Progress	On-going	On-going	Green	Housing Ombudsman Report Action Plan
		Audits show that staff are implementing the procedures and policies consistently.	See action 15 above plans for audit of cases and address issues of non-adherence through one to ones.	HMT	High	In Progress	See relevant actions for details	See relevant actions for details	Green	
HO15	Audits show that staff are implementing the procedures and policies consistently.	Property services actions - 1) All orders are to be managed on OneServe and records are kept up to date on jobs and close when complete. 2) Works in progress team to manage complex jobs to completion (weekly review meetings), 3) W in P call over tracker in place overseeing all legal, D&M and high risk cases (including leaks), 4) Quarterly audit, including reviewing call recordings to ensure call quality.	Mike Hall	High	In Progress	On-going	on-going	Green	Housing Ombudsman Report Action Plan	

HO16	Rec 6 - Ensure that its staff are properly considering any vulnerabilities of a resident and how that might impact the landlord's response.	Review of implementation to demonstrate the policy is being used and benefitting residents.	Develop a vulnerability policy with colleagues across the council that reflects Islington's needs and levels of vulnerability and consolidate our vulnerability data and ensure system flags are appropriate. Benchmark against best practice nationally and consult residents and partners before formally launched	Ian Swift	High	In Progress	09/10/23	30/06/24	Green	Housing Ombudsman Report Action Plan
HO17		Reduction in the number of complaints and HO determinations (after full implementation) which include findings that vulnerabilities not properly responded to.	Promote the new policy with staff and embed with local training within team meetings.	Ian Swift/Matt West	High	Not Started	TBC	31/07/24	Green	Housing Ombudsman Report Action Plan
HO18			Review the implementation of the policy through complaints reviews, consultation with residents and managerial audits.	Ian Swift	High	Not Started	TBC	30/06/24	Green	Housing Ombudsman Report Action Plan
HO19			Ensuring all home visit audits record vulnerabilities and these are recorded onto core IT system.	Ian Swift	High	In Progress	01/01/24	29/02/24	Green	Housing Ombudsman Report Action Plan
HO20			Undertake annual training for front line staff on empathy and trauma informed service provision for people with vulnerabilities .	Ian Swift	High	In Progress	On-going	On-going	Green	Housing Ombudsman Report Action Plan
HO21			Ensure contractors have adequate training in place for their staff or extend our training offer to them.	Mike Hall	High	In Progress	On-going	On-going	Green	Housing Ombudsman Report Action Plan
HO22			Work with Health Colleagues to improve our data quality on vulnerability. Ensure the locality based working between Adult Social Care and Homes and Neighbourhoods is harmonised	Ian Swift	High	In Progress	01/09/23	On-going	Green	Housing Ombudsman Report Action Plan
HO23	Rec 7 - Carry out comprehensive research into the reasons for ineffective appointments and create an action plan to reduce the number.	Reduction in % of missed appointments, though service monitoring within the council and Partners.	Complete a review of missed appointments across the repairs and surveying teams. Check list has been provided to staff to ensure appointment issues such as sickness/timescales are signed off by supervisors – to reduced missed appointments.	Mike Hall	High	Complete	01/07/23	31/12/23	Green	Housing Ombudsman Report Action Plan
HO24		Downward trend in complaints referencing missed appointments	Back stop team in place that are working through live work orders. A new process that is on-going with Housing Direct to ensure missed appointments are minimised.	Mike Hall	High	In Progress	On-going	On-going	Green	Housing Ombudsman Report Action Plan
HO25		Partners produce a report or data on ineffective appointments and an produce action plan to implement measures to reduce.	Through clienting arrangements, discuss with Partners a mirrored review of missed appointments within their repairs service. Seek best shared practise with directly managed service. Agree implementation plan with Partners.	Hannah Bowman	High	In progress	Nov-23	31/01/24	Green	Housing Ombudsman Report Action Plan

HO26	Rec 8 - Improve oversight of repairs which involve third party contractors or managing agents.	Audit demonstrate that information in the system is of a consistent quality where third parties are delivering repairs	Ensuring monthly operational meetings with contractors to go through and focus on Works in Progress and ensuring they update the systems. 100% of contractor repairs are post inspected. Reviewed through Property Service Management Team meetings.	Mike Hall	High	Complete	Complete	Complete	Green	Housing Ombudsman Report Action Plan
HO27			Moving forward, looking at ways where contractors can access Oneserve remotely so the council can have live updates on work orders.	Mike Hall	High	In Progress	01/12/23	TBC	Amber	Housing Ombudsman Report Action Plan
HO28			Increased oversight and quality assurance of the repairs process.	Mike Hall	High	Complete	Complete	N/A	Green	Housing Ombudsman Report Action Plan
HO29			Ensure record keeping is maintained to a consistent standard to in-house delivery. Include in audits of jobs to check this is happening.	Mike Hall	High	Complete	01/09/23	31/01/24	Green	Housing Ombudsman Report Action Plan
HO30		Monthly audits	SPV and increased clienting team monthly audits of repairs delivery in addition to Rydon's repairs supervisors carry out 10% technical sample checks of responsive repairs and 100% of major repairs. Partners Special Purpose Vehicle carries out a 10% sample check of repairs data to analyse for repeat repairs to identify failures. The SPV post inspect 5% of responsive and 50% of major works to communal areas.	Hannah Bowman	High	Complete	01/11/23	31/12/23	Green	Housing Ombudsman Report Action Plan
HO31			Annual report to HMT/Housing Scrutiny as part of Partners clienting arrangements and performance Report. Last report submitted in July '23	Hannah Bowman	High	Complete	Jul-23	Annually	Green	Housing Ombudsman Report Action Plan
HO32			The Clienting team will also carry out a 50% sample check of cases deemed as Major Works within the PFI contract and will implement a process to seek an expert technical opinion on the quality or standard of a repair or works where a complaint has not been upheld by Partners.	Hannah Bowman	High	Complete	01/11/23	31/12/23	Green	Housing Ombudsman Report Action Plan
HO33		Rec 9 - Proactively consider what can be done to mitigate the impact of more complex repair situations on the resident as far, and as soon, as possible.	Performance measures in place to check that there has been an improvement in timescales through the weekly call over meetings and reduction of chase up calls and missed appointments.	HPS actions: 1) Backstop team now in place which deals with live updates and back-office operations to ensure works are completed, 2) leaks team now in place that all remedial woks are monitored to completion, 3) Weekly call overs in place.	Mike Hall	High	Complete	Complete	N/A	Green

HO34		Positive feedback from partner organisations.	Reviewing idea of structure and expanding leak team to undertake more complex works across the service. Ensure that consideration of vulnerabilities are embedded in to these reviews.	Matt West	High	In progress	01/11/23	31/01/24	Green	Housing Ombudsman Report Action Plan
HO35			Further partnership events to be held to review changes we have made and their impact/improvements	Ian Swift	High	In Progress	01/11/23	31/03/24	Green	Housing Ombudsman Report Action Plan
HO36			The clienting team to discuss with directly managed services to understand the definition of a complex repair and the processes and teams in place and how they manage these types of works to share with Partners. The clienting team will carry out a weekly desktop audit of around 50% of repairs deemed as Major Works within the PFI contract to check that they are on track and that there are no avoidable or unnecessary delays to completion.	Hannah Bowman	High	Complete	15/11/23	30/11/23	Green	Housing Ombudsman Report Action Plan
HO37			Clienting team to hold quarterly joint meetings with the SPV, Rydons and directly managed services to share practises and updates or improvements on key repairs policies.	Hannah Bowman	High	Complete	01/11/23	30/11/23	Green	Housing Ombudsman Report Action Plan
HO38			Review of major works transfer procedure to ensure complex repairs and appropriate responses of residents are included in the procedure.	Ian Swift	High	In Progress	01/08/24	28/02/24	Green	Housing Ombudsman Report Action Plan
HO39			Communication training – including within this the need to adapt how we communicate with people and finding out their needs – see recommendation 4.	Hannah Bowman	High	In Progress	01/12/23	31/11/2024	Green	Housing Ombudsman Report Action Plan
HO40	Rec 10 - Include in its damp and mould procedure an early risk-assessment that specifically factors in any vulnerabilities, with corresponding timescales for a surveyor visit dependent on the preliminary risk assessment. The damp and mould procedure should also clarify the escalation trigger points and be clear about ownership	Monitor the use of the risk assessment to ensure it is being used by the call centre. DAM24 work orders are raised when applicable or from site following diagnostic inspection.	Develop a short risk assessment for use in Housing Direct to identify and record risk factors and share with Partners. The Damp and Mould Team Manager to use this to prioritise property visits. Flags currently on system ensure HD prioritise property visits. Further work with Colleagues in Public Health to identify residents that are vulnerable to add to the system.	Mike Hall	High	In Progress	01/09/23	28/02/24	Amber	Housing Ombudsman Report Action Plan
HO41	and accountability for ensuring a final resolution for the resident.	Further work with Colleagues in Public Health to identify residents that are vulnerable to add to the system.	Update the damp and mould procedure to include trigger points.	Mike Hall	High	Complete	Complete	N/A	Green	Housing Ombudsman Report Action Plan

HO42		Monitor the success of the use of trigger points through a damp and mould case review.	Stand alone damp and mould team, that carry works out two types of priority. DAM20 & DAM24. If members are contacting us with regards to vulnerabilities DAM24s are raised which means we will be attending that property within 24 hours.	Mike Hall	High	Complete	Complete	N/A	Green	Housing Ombudsman Report Action Plan
HO43			Produce a revised repairs policy including a damp and mould Section for agreement by Executive.	Mike Hall	High	In Progress	01/09/23	30/04/24	Green	Housing Ombudsman Report Action Plan
HO44			Partners have implemented Damp and Mould processes in line with the required framework. The Clienting Team to carry out a comparison exercise with the councils processes to ensure that there are no gaps. Including sharing the councils short term risk assessment with Partners to adopt. Link Partners with colleagues in Public Health to identify and improve their data on vulnerable residents. Ensure Partners adopt the same attendance targets where cases of damp are reported, for residents with vulnerabilities.	Hannah Bowman	High	In Progress	01/12/23	31/12/23	Green	Housing Ombudsman Report Action Plan
HO45			The team to work closely with the repairs service to understand updates and improvements made to the Damp and Mould process and ensure Partners capture these within their service.	Hannah Bowman	High	In Progress	15/11/23	30/01/24	Green	Housing Ombudsman Report Action Plan
HO46			Share councils revised repairs policies with Tenant Management Organisations. Organise briefings through Managers Forum and other joint TMO platforms.	Hannah Bowman	High	In Progress	01/12/23	31/01/24	Green	Housing Ombudsman Report Action Plan
HO47	Rec 11 - Create an action plan for additional steps designed to establish communication with the residents it has identified as having previously reported damp and mould	Confirmation that the live action plans have been updated. Action plan will be developed with this approach – amending any action points that are not SMART	Create SMART action plan to establish communication with residents Islington Council have identified as having historic reports of Damp and Mould	Matt West	High	In Progress	01/12/22	31/01/24	Green	Housing Ombudsman Report Action Plan
HO48	Rec 12 - Review its void process and procedure to remove unnecessary hand-over points and use the void period more effectively to address any disrepair.	See a reduction in the amount of works carried out after the resident is in occupation through voids in occupation team reports. Reviewed through call over meeting with Group Leaders.	Monitor the embedding of any changes and reduction in post occupation void works.	Mike Hall	High	Complete	on-going	on-going	Green	Housing Ombudsman Report Action Plan
HO49			Currently reviewing Voids process and void standard review in place with colleagues in tenancy. Review voids process to ensure they address disrepair during the voids period and avoid unnecessary hand over points.	Mike Hall	High	Complete	01/05/23	31/01/23	Green	Housing Ombudsman Report Action Plan

HO50			Clienting team to validate that Partners Voids specification incorporates checks for damp and mould and other potential disrepair issues and share the councils revised voids standard with Partners.	Hannah Bowman	High	In Progress	01/02/24	31/01/24	Green	Housing Ombudsman Report Action Plan
HO51			Clienting team to monitor complaints and disrepair from voids through regular contract review meetings (CRM) and progres on improvements form a recent audit of the service has lead to improvements in identify complex or lengthy works to the property, such as damp and mould, early on in the voids servicing to avoid delays where structural works are required.	Hannah Bowman	High	In Progress	01/12/24	31/01/24	Green	Housing Ombudsman Report Action Plan
HO52			Share council's revised voids policies with Tenant Management Organisations. Organise briefings through Managers Forum and other joint TMO platforms.	Hannah Bowman	High	Complete	01/12/23	12/01/24	Green	Housing Ombudsman Report Action Plan
HO53	Rec 13 - Review its mutual exchange policy to ensure it does not place unreasonable onus on the resident to identify damp and mould or other disrepair.	Policy updates complete and changes promoted with tenancy officers in the council and Partners through briefings.	Review the council's policy and procedure, which is used by the council and Partners and update resident facing documents and information.	Hannah Bowman	High	In Progress	01/09/23	28/02/23	Green	Housing Ombudsman Report Action Plan
HO54	Rec 14 - The repairs policy should contain a clear escalation pathway if repairs are delayed beyond agreed or expected dates, ensure senior involvement and oversight, and processes to ensure all relevant teams within the landlord work together in a resolution-focussed way.	Web pages updated	Overhaul of the Repairs page on the website – as part of the service	Mike Hall	High	In Progress	01/09/23	30/04/24	Green	Housing Ombudsman Report Action Plan
HO55		Policy in place and meet requirements.	Changes to repair policy will address this issue as well as back stop, leaks team and damp team arrangements will	Mike Hall	High	In Progress	01/09/23	30/04/24	Green	Housing Ombudsman Report Action Plan
HO56		Monitoring service against agreed timeframes.	Policy has clear guidelines on priority times. Additional 'Repairs stories' being	Mike Hall	High	In Progress	01/09/23	30/04/24	Green	Housing Ombudsman Report Action Plan
HO57			Partners will need to respond to any changes in our policy. – Stacey to	Hannah Bowman	High	In Progress	01/12/23	31/01/24	Green	Housing Ombudsman Report Action Plan
HO58			Clienting team to determine current escalation processes within Partners repairs policies. Share council's revised Repairs Policy with Partners to mirror	Hannah Bowman	High	In Progress	01/12/23	31/01/24	Green	Housing Ombudsman Report Action Plan
HO59	Rec 15 - Self-assess against the recommendations in Time to be Heard and use this insight in its policy development. In particular, the landlord should ensure its Good Neighbourhood policy and ASB policy work together coherently.	Assessment will be completed and shared with senior leaders of the Council and the Housing Ombudsman. Actions that arise from the self-assessment will be tracked via a departmental action plan and will pass through the governance	Self-assessment against these recommendations began in August 2023 and is due to be finalised by the end of October 2023.	Ian Swift	High	Complete	01/08/23	31/10/23	Green	Housing Ombudsman Report Action Plan
HO60		Present to Policy and Performance Scrutiny Committee 2 nd November 2023 and incorporate their feedback.	Review on how best to advise residents on recording noise for reporting issues to us - new process in place.	Ian Swift	High	In Progress	01/06/23	31/07/24	Green	Housing Ombudsman Report Action Plan
HO61			Conduct monthly audits to ensure best practice is taking place.	Ian Swift	High	In Progress	on-going	on-going	Amber	Housing Ombudsman Report Action Plan

HO62			Attend the Policy and Performance Scrutiny committee in November 2023, to provide a transparent presentation on	Ian Swift	High	Complete	01/11/23	30/11/23	Green	Housing Ombudsman Report Action Plan
HO63	Rec - 16 - Ensure that relevant staff are fully empowered and supported in applying the procedures for responding to reports of ASB or noise.	All relevant staff are trained across the council and Partners .	Develop staff and frontline manager training programme on the ASB and Neighbourhood policy and applying this	Ian Swift	High	In Progress	01/04/24	31/08/24	Amber	Housing Ombudsman Report Action Plan
HO64		Audits show that staff are implementing the procedure consistently.	Ensure all staff are trained and follow up on cases in check-in meetings.	Ian Swift	High	Complete	31/03/24	01/06/24	Green	Housing Ombudsman Report Action Plan
HO65		Staff survey shows staff feel empowered in their roles and are	Audit cases across the team to ensure that processes are being correctly	Ian Swift	High	In Progress	15/01/24	On-going	Green	Housing Ombudsman Report Action Plan
HO66			Complaints team to identify with Service Head any failures to adhere to the ASB and related policies identified through complaints investigation	Hannah Bowman	High	In Progress	02/01/24	On-going	Green	Housing Ombudsman Report Action Plan
HO67			Conduct annual staff opinion surveys to monitor empowerment, satisfaction etc.	Ian Swift	High	In Progress	01/11/23	28/02/23	Green	Housing Ombudsman Report Action Plan
HO68	Rec 17 - Put in place structured proactive processes for monitoring officers' compliance with its policy and effectively addressing any failures	Audits show that staff are implementing the procedures and policies consistently.	See action HO9 above plans for audit of cases and address issues of non-adherence through one to ones.	Ian Swift/Matt West	High	Not Started	01/04/24	On-going	Green	Housing Ombudsman Report Action Plan
HO69	Rec 18 - Put in place more effective executive and board level oversight, including its member responsible for complaints, to ensure accountability, and effective and timely learning from complaints.	Reports in updated format.	Housing Management Team quarterly complaints report – consistent approach to learning from complaints to be implemented – moving away from case studies towards trends across the board	Jed Young	High	In Progress	01/11/23	On-going	Green	Housing Ombudsman Report Action Plan
HO70		Learning from complaints incorporated into departmental action plan and measurements of success included in objectives.	Significant actions from complaints learning to be incorporated into Departmental Action Plan. Outcomes of actions to be measured through the	Jed Young	High	In Progress	02/01/24	On-going	Green	Housing Ombudsman Report Action Plan
HO71			Produce an annual report to the Housing Scrutiny covering all Housing Ombudsman and housing related Local Government & Social Care Ombudsman outcomes, complaints and compliments.	Jed Young	High	Complete	01/11/23	01/12/23	Green	Housing Ombudsman Report Action Plan
HO72	Rec 19 - Provide mandatory complaint handling training to all staff, even those not directly involved in responding to complaints, to promote the benefits of complaints and ensure all staff appreciate the importance of complaints, as well as raising the standard of investigation and response.	Ensure that all staff have been trained in complaints handling and the importance of complaints.	Develop a programme of complaints handling training over the next year. Maintain records of staff who have had	Jed Young	High	Complete	30/11/23	30/11/23	Green	Housing Ombudsman Report Action Plan
HO73		Monitor impacts on quality and timeliness of responses within the complaints process to ensure improvement.	Train staff in priority order and include training as mandatory for new starters.	Jed Young	High	Not Started	19/02/24	30/11/24	Green	Housing Ombudsman Report Action Plan
HO74		Assess the benchmark results annually going forward	Undertake benchmarking against best in class in England for the management of	Jed Young	High	Not Started	02/01/24	28/02/24	Green	Housing Ombudsman Report Action Plan
HO75		To further improve the quality of our services	Undertake independent and external facilitated annual mystery shopping exercises across all Homes and Neighbourhood services. To review the Chartered Institute of Housing Better	Jed Young	High	In Progress	03/12/23	On-going	Amber	
HO76	Rec 20 - Put in place a coherent complaints process and procedure with clear expectations of quality.	Quality audits see an improvement in responses.	Review complaints procedure and enhance quality requirements.	Jed Young	High	In Progress	13/03/24	31/05/24	Green	Housing Ombudsman Report Action Plan
HO77		Lower levels of escalation through the complaints process.	Restructure complaints team to include two team leaders to review quality of complaints and identify staff who need	Jed Young	High	In Progress	05/12/23	13/03/24	Green	Housing Ombudsman Report Action Plan

HO78			Work with service teams to improve the quality of information provided to	Jed Young	High	In Progress	19/02/24	On-going	Green	Housing Ombudsman Report Action Plan
HO79			Carry out quality audits of complaints responses at all levels, feed findings into	Jed Young	High	In Progress	08/01/24	28/02/24	Green	Housing Ombudsman Report Action Plan
HO80	Rec 21 - Ensure that complaint response letters that are escalated to	That CCU can demonstrate these have been shared with the CE	Recommendation adopted and in place	Raj Chand	High	In Progress	01/12/23	22/12/23	Green	
HO81	Stage 2, or apology letters in response to orders from an Ombudsman, are brought to the attention of the Chief Executive and are signed off by a suitably senior member of staff.	Housing complaints team to maintain records to show HMT sign-off of stage 2 responses.	A member of HMT to sign-off all stage 2 responses.	Ian Swift	High	In Progress	02/01/23	On-going	Green	Housing Ombudsman Report Action Plan

Priority	Status	RAG	Link to Key Plan	Consumer Standard
Low	Complete	Red	Damp, Condensation & Mould Action Plan	Safety & Quality Standard
Medium	On Hold	Amber	Housing Ombudsman Report Action Plan	Transparency, Influence & Accountability Standard
High	In Progress	Green	Housing KIM Audit Action Plan	Neighbourhood & Community Standard
	Not Started		Housing Property Services Improvement Action Plan	Tenancy Standard
	Delayed		Pilot Inspection Lessons Learned Log Action Plan	
			Resident Engagement Strategy Action Plan	
			Spotlight Reports on Noise Complaints Action Plan	

Homes and Neighbourhoods 222 Upper Street

Report of: Cllr O'Halloran Executive Member for Homes and Communities

Meeting of: Executive

Date: 20th July 2023

Ward(s): This report impacts on all electoral wards in Islington

Subject: New Temporary Accommodation Framework

1. Synopsis

- 1.1. To say that we have reached a national crisis in temporary accommodation would not be an exaggeration. Shelter have estimated that there are now over 250,000 people in temporary accommodation across the UK, including many children, with an already desperate situation worsened by the effects of the Covid-19 pandemic and the cost of living crisis. In London, London Councils have reported in March 2023 that there are 166,000 homeless households living in Temporary Accommodation in London, with 81,000 children now living in Temporary Accommodation. This is equivalent to one child in every classroom across London living in Temporary accommodation.
- 1.2. London is disproportionately impacted and in Islington, with over 1,058 homeless households placed in temporary accommodation at the end of June 2023 compared to 750 before the pandemic in March 2020, the challenge of finding appropriate and affordable accommodation for residents is immense.
- 1.3. This report brings forward an action plan for the ongoing procurement of temporary accommodation, fully utilising the Council's own stock whilst also giving the Council more flexibility to find good quality accommodation in a greater range of locations for leasing and to support private rented sector offers. We do not make this latter change lightly – searching for appropriate housing in Islington and as close to Islington as possible remains a core principle in line with legislation. However, given the constraints of the Local Housing Allowance and the Benefit Cap which continues to price residents out of the local area, the Council is having to broaden its search.

- 1.4. As set out in this report and detailed in our policies, households will continue to receive up to two offers of private rented sector accommodation and will retain their right to bid for council housing in Islington. The impact of this policy change will be closely monitored including through a new annual Temporary Accommodation report, which will be presented for scrutiny.
- 1.5. Alongside this change, we are bringing forward a significant investment in quality through our new Good Homes Standard for Temporary Accommodation. This builds on our existing commitment not to use Bed & Breakfast accommodation for families, recognising that 'Temporary Accommodation' can actually be someone's home now for several years, especially given the growing waiting list for general needs council housing and reduced number of lettings. Among other things, the Islington Good Homes Standard, will improve tenure security for those in temporary accommodation, and also seek to secure essentials like a cooker and fridge for people, when they first move into a property.
- 1.6. Ultimately, the Temporary Accommodation crisis will only be solved with a focus on the root causes of homelessness, the building of more social housing, and a more accessible, affordable and secure private rented sector.

2. Recommendations

- 2.1.1. To note the Temporary Accommodation Policy and Action Plan Report and agrees to publish and implement The Islington Good Homes Standard (for homeless households) (Appendix 5).
- 2.1.2. To agree an annual temporary accommodation (TA) scrutiny report be produced.
- 2.1.3. To note homeless households in temporary accommodation placed outside of the borough will retain their rights to bid for Islington's permanent social housing.
- 2.1.4. To agree the revised Temporary Accommodation Procurement Policy for Homeless Households (Appendix 1) including a revised Temporary Accommodation Supply Action Plan.
- 2.1.5. To approve the revised Private Rented Sector Offers Policy for Homeless Households (Appendix 2) .
- 2.1.6 To approve the revised Temporary Accommodation lettings framework (Appendix 3).

3. Background

- 1 This report aims to deliver revisions to existing approved policies to expand on our provision and access to good quality and affordable housing solutions for homeless families and individuals. This also meets key priorities of our Homelessness Prevention and Rough Sleeping Strategy, namely preventing, tackling rough sleeping and responding to the local housing market.
2. Revisions to the existing homelessness policies aim to increase access to affordable and suitable accommodation as well as introducing the Islington Good Homes Standards. The new policies will:
 - remove restrictions on geographical limitations for procuring good quality homes.
 - confirm a standard for private rented sector (PRS) and temporary accommodation homes.
 - confirm that the PRS will be used to prevent homelessness from the first point of contact with the council, through a rapid re-housing framework that is focussed on the needs of the resident.
 - improve 'trust and reliability' in the service so that when we say we will do something, we follow through with it.
 - encompass a restructure across the Housing Needs and Strategy service that aims to streamline the communication process and allow empathetic relationships to form between officer and customer.
 - aim to resolve the housing enquiry at the first point of contact with the service user being informed of the expected journey through the service from the outset.
 - provide accommodation in the private rented sector for care leavers as part of the council's corporate parenting duty.
3. The proposed approach remains in line with legislative requirements, government guidelines, relevant case law and our equality commitments. The first priority is still to secure good quality, affordable accommodation in Islington and where this is not possible to secure then to look at areas as close as possible to Islington until good quality, affordable accommodation is secured.

BACKGROUND INFORMATION

4. The council has specific duties towards homeless persons as set out in the Housing Act 1996 Part VII as amended (HA96), and the Homelessness Reduction Act 2017 (hereafter referred to as HRA17), including the duty to carry out enquiries to establish the level of duty owed to a household. If the Council has reason to believe that a homeless applicant may be eligible, homeless and in priority need, it has a duty to ensure that suitable temporary accommodation (TA) is available to the household.
5. The Homelessness Reduction Act 2017 (HRA17), introduced relief duties, following on from new prevention duties, requiring councils to take reasonable steps to help secure accommodation for any eligible person who is homeless for up to 56 days.
6. Where a main housing duty is accepted then the household remains in TA until they are permanently rehoused or until the duty ends for any other reason. In Islington, this has

meant waiting for a Part 6 offer of social housing. As the supply of social housing continues to be outstripped by demand, this has resulted in an increase in TA numbers.

7. The background leading to the implementation of these proposed policies is set against a national housing crisis, a rental market that is largely unaffordable due to central government welfare reforms and a continued fall in social housing annual lettings due to the Right to Buy outstripping our own ambitious new build homes project.
8. The Local Housing Allowance (LHA) rates and benefit caps set by central Government now make it almost impossible to re-house people into private rented accommodation locally in Islington. Additionally, the available move on options through the allocation of a social housing lettings has further decreased in the last 4 years by 21%. By way of context, there were 1,186 social housing lettings in 2019/20 in contrast to 937 lettings in 2022/2023. The reduction in lettings has resulted in residents occupying temporary accommodation for significantly longer periods with no guarantee that social housing will ever be provided. Using the Government's own data homelessness is expected to increase by 20% over the next 12 months and it is anticipated lettings of Islington Council and Housing Association accommodation lettings will continue to decline in numbers due to the financial fallout of Brexit and COVID19 and the cost of living crisis.
9. In an effort to address these challenges, a considered and measured needs assessment that adopts an honest, holistic and transparent enabling approach will be conducted. It is intended that the new service to be designed will support the aim to reduce the numbers of people in temporary accommodation. Homeless people would still receive housing advice, assistance and support when needed and the service offer will be designed to ensure the best accommodation is offered to homeless people in need, but the offer would not rely on expensive temporary accommodation. This offer of secure private rented accommodation would be made through a streamlined communication process and allowing empathetic relationships to form between officer and customer. The aim would be:
 - inform the service user of their likely journey from the outset.
 - to resolve and prevent homelessness at the first point of contact.
 - to ensure a Rapid Rehousing focus at the heart of the service offer
 - increase stability, with no need to move from one address to another address as is common in TA
 - eliminate the use of nightly paid temporary accommodation within the next 24 months
10. The Housing Needs and Strategy service will redesign its service with the aim of making Private Rented Sector Offers (PRSO) to households, as an option, where appropriate, at an earlier stage in homelessness prevention and relief activities. This re-design is aligned with best practice examples already adopted by a number of other councils in London.
11. The Procurement Policy (Appendix 1) is required to demonstrate Islington Council's procurement and allocations of temporary accommodation following the Supreme Court decision in *Nzolameso v Westminster City Council*. The Private Rented Sector Offer policy (Appendix 2) is required to give effect to existing provisions in Islington Council's Housing Allocation Scheme to discharge housing duty to statutory sets out the legislative framework and Islington Council's policy for making PRSOs to homeless households by

making a PRSO, subject to suitability and compliance with the Homelessness (Suitability of Accommodation) Order 2012. The Lettings framework (Appendix 3) addresses the provision of temporary accommodation and creates three bands for the assessment of suitable temporary accommodation and is required to evidence compliance with the 1996 Housing Act (as amended) and the Localism Act 2011.

12. A large number of recent reports from Shelter, Crisis, etc. have demonstrated the negative effects of homelessness and temporary accommodation on people's physical and mental health. More stable and settled accommodation available in the private rented sector may contribute positively in addressing the effects of homelessness and periods in temporary accommodation. The aim of this new policy framework is to provide good quality accommodation for the resident following the first point of contact with the Housing Needs and Strategy service to build stability in the resident's life and remove the temporary nature of accommodation historically provided by the council.
13. The gross cost to the council's General Fund for providing temporary accommodation for homeless households is shown in table 1 below:

Financial Year	Gross Cost
2017/2018	£9,403,602
2018/2019	£9,963,767
2019/2020	£11,184,865
2020/2021	£12,406,383
2021/2022	£13,755,210

This cost does not include the costs of the Housing Needs and Strategy Team, or costs contained within the Housing Revenue Account (HRA). The 46% increase in cost to the council's General Fund since 2017/18 demonstrates the ever increasing pressure on the council's finances and provision of temporary accommodation. The budgeted cost to the council for each homeless presentation using the current framework is approximately £2,500 per year, actual costs for larger households are often far in excess of budgeted costs.

14. While demand for housing and homelessness has steadily increased over the past few years, this has grown much more rapidly both in Islington and across London. There are now over 990 homeless households in TA at the end of February 2023, whereas in April 2018 there were under 745. Table 2 below shows the homelessness approaches recorded by Islington Council as an indicator of the growth in homelessness demand over the last three financial years. The 2020/21 increase represents a 37% increase in approaches from 2018/19.

Table 2: Homeless approaches

Financial Year	Number of homeless approaches
2018/2019	853
2019/2020	975
2020/2021	1167
2021/2022	1030
2022/2023	1498

15. There is a fair degree of certainty that homelessness presentations will continue to rise over the immediate future. This is anticipated on the basis of:
- increasing demand to date.
 - the Covid-19 pandemic which saw a further spike of 20% over the course of 2020/21 (in contrast to the previous year);
 - continued and impending financial fallout of the pandemic;
 - Brexit;
 - Lifting of the evictions ban.
 - The enactment of the new Domestic Abuse Act.
 - Central Governments own projections indicate a further 20% increase in the next 12 months;
 - Cost of living crisis.
16. The Accommodation Procurement Policy (Appendix 1) responds to the acute difficulties in procuring sufficient temporary accommodation within Islington and London for homeless households. It provides an action plan for meeting demand and sets out the procurement principles that will be followed for sourcing properties, both for temporary accommodation and for private rented sector offers.
17. The policy aims to provide enough housing for homeless households to meet demand. It aims to contain temporary accommodation costs by ensuring that supply is affordable to the council and within subsidy levels and this is a key procurement principle. The policy also aims to ensure that housing, for both temporary accommodation and for private rented sector offers, is affordable to low income households and within benefit levels, so as to remain sustainable in the longer term. This means that some properties procured will sometimes be located outside Islington.
18. The policy also aims to ensure that locations where properties are procured are suitable for homeless households.

19. The Private Rented Sector Offers Policy (Appendix 2) sets out that an offer of a suitable private rented tenancy may be made to any homeless household where the law allows. The policy acknowledges that a private rented sector offer is not appropriate for everyone. It excludes households which the council determines would be unable to manage a private rented sector tenancy and for households needing sheltered or wheelchair accessible housing. In these cases social housing will continue to be offered.
20. In order for private rented offers to be affordable to homeless households within benefit levels (or as close as possible), many of these offers are likely to be outside Islington. Support will be offered to households relocating outside Islington and to other households where needed, in order to minimise adverse impacts and to enhance the prospects of relocated families integrating into the new area.
21. The policy aims to reduce temporary accommodation use and contain costs by offering homeless households private rented housing, as an alternative to them spending potentially several years in temporary accommodation waiting for social housing. The policy also aims to help to improve outcomes for homeless households in that they will receive a quicker permanent offer of housing, in an area where they are able to settle and put down long-term roots.
22. Every effort will be made to find affordable properties in Islington or as close to the borough as possible and the evidence in the Accommodation Procurement Policy (Appendix 1) supports this by assessing availability and affordability in Islington and exploring incrementally outwards from the borough.
23. Accommodation will normally only be procured if it is affordable. Under the existing welfare reform conditions, it is necessary to ensure that households are not placed in accommodation that will result in them enduring avoidable financial hardship. Equally, it is not the intention of the policies for the council to have to provide ongoing financial support to cover housing costs for large numbers of households as this would be financially unsustainable given the significant financial pressures on public services.
24. Due to this shortage of affordable accommodation, out of borough placements into more affordable areas have become more prevalent particularly across London and the Southeast generally. In London, the data shows that 37% of households placed in temporary accommodation are placed in a different borough to the one which owes them a duty. In comparison, in quarter one, 2010/11; the equivalent proportion was only 13%.
26. The Temporary Accommodation lettings framework (Appendix 3) explains Islington Council will continue to seek accommodation within Islington wherever possible, however, more housing for homeless households will likely be outside Islington. This policy sets out how households will be prioritised for properties, both for private rented sector offers and for temporary accommodation, in different locations.
27. Over the last 3 years, there has been a 35% increase in homeless approaches to the local authority which has been further amplified with the recent Covid-19 pandemic and cost of living crisis.
28. It is noted that with the increase in temporary accommodation this will mean there will be a requirement to also source private rented accommodation outside of Islington. However, to ensure residents are empowered, Islington will operate within the PRSO

policy so that residents are able to source the property independently through our Self Help Scheme or through the assistance of Islington Council whom have built up a number of links to access private accommodation.

29. In each instance, the council will conduct a number of checks to ensure the property is affordable, meets the needs of the household and is at a standard of quality in which residents would be happy to reside.
30. The council will need to be alive to the possibility there may be less of a need for residents to travel into Islington for employment purposes as a result of Covid-19 and therefore consideration of other areas will also be an option for a number of our residents.
31. Accommodation in the private rented sector within Islington is often not affordable for many residents who approach the council. The local housing allowance (LHA) sets the amount of housing support paid out either as part of Universal Credit (UC) or under the legacy Housing Benefit, to those living in the PRS. LHA rates are set by calculating the 30th percentile of rents in 'Broad Rental Market Areas'. In Islington's case, the area includes neighbouring boroughs where rents are cheaper. The shortfall between LHA rates and private rents in Islington is stark, as shown in Table 3 below:

Table 3 Accommodation type Market Rents and LHA rates

Average Market Rent per month	LHA rates per month
Studio £940	£668
1 bedroom £1,450	£1,280
2 bedroom £1,880	£1,586
3 bedroom £2,100	£1,915
4 bedroom £3,250	£2,573

32. Therefore, the following framework is proposed to extend our provision of quality services and access to affordable housing solutions for homeless families and individuals. The council's order of priority will be to:
 - secure accommodation in Islington as a default.
 - where it is not possible to secure good quality, affordable accommodation in Islington, secure accommodation in surrounding boroughs.
 - where it is not possible to secure good quality, affordable accommodation in surrounding boroughs, secure accommodation in other London boroughs.

- where it is not possible to secure good quality, affordable accommodation in other London boroughs, secure accommodation in other areas within the M25 or further afield if required.

The council will also work to secure accommodation for those households who wish to live outside of this area.

34. The accommodation offered will be within 90 minutes reasonable journey time by public transport from the address the household was living at before they became homeless. Travel times will be measured using the Transport for London online Journey Planner. However, applicants who have as part of their household, a child or children who are enrolled in public examination courses in Islington, with exams to be taken within the next six months will be allocated accommodation as close to the school as possible and with Wi-Fi connection provided for the household. Please note the council's aspirations is to re-house people as close to Islington as possible and the aspiration is to accommodate people within one hour of Islington.
35. Therefore, the Accommodation Procurement Policy for Homeless Households (Appendix 1) and the Private Rented Sector Offers Policy for Homeless Households (Appendix 2) will apply the Islington Good Homes Standard (for homeless households).
36. The proposed Islington Good Homes Standard for homeless households would move all families from nightly paid accommodation into Private Sector Leased accommodation or Private Rented Sector where affordable. The Good Homes Standard would also build on and advance the council's work which eliminates the use of Bed and Breakfast accommodation usage by families, by providing tenancies to all homeless families after 28 days, something which is currently not achieved by the Housing Needs and Strategy service.
37. The council's current framework to provide accommodation for homeless households does not meet the following elements of the proposed Good Homes Standard:
 - As a tenancy in the household's name (with a rent review clause to ensure any future increases are fair and reasonable). At the moment this standard is not implemented for Nightly Paid households. However, for all other households this standard currently exists.
 - Has a cooker that is in good, clean, working condition. This is not a standard currently available in 100% of our temporary accommodation properties.
 - A written contract, including clear details of when and how your rent should be paid. At the moment this standard is not implemented for Nightly Paid households. However, for all other households this standard currently exists.

Cost assumptions

38. It is assumed that any current homeless household living in Nightly Paid Private Sector Leased accommodation will be moved to more affordable private rented sector accommodation. There are approximately 531 homeless households currently living in this accommodation.
39. The payment of incentives will need to continue to be paid to Private Sector landlords through the existing framework, which is assumed will remain as is. The average cost of

the incentive payments per property is £2,800, which is a recurring cost to the authority every three years. The incentive costs are based on the existing homeless households and assume all properties meet the Good Homes Standard and remain in the accommodation for the rest of the financial year.

40. The council will discharge its homeless duty through the proposals above to homeless households in the future in order to enable the council to balance the precise housing needs of each household, meet our legislative duties and help to deliver a service within the budget provided for the service.
41. The proposed Good Homes Standard is a positive step forward and a step to provide greater security to homeless households. This new approach therefore sets out a framework which will take steps to eliminate unstable forms of temporary accommodation, namely nightly rate temporary accommodation.
42. A further proposal is to confirm an approach for providing shared nightly rate accommodation for single homeless households. This provision will be in line with legislative requirements and guidance, with The Homelessness (Suitability of Accommodation) (England) Order 2003 and The Homelessness (Suitability of Accommodation) (England) Order 2012 of particular relevance. The 2003 Order states that families should not reside in shared B&B for more than 6 weeks, this includes pregnant households. However, this ruling does not extend to single people.
42. The council would not look to place anyone into shared accommodation if there were health risks associated with this and a suitability assessment will be completed for any placements into this type of accommodation.
43. Access to shared temporary accommodation for single households makes a significant difference to the cost pressures on the General Fund budget.
44. TA is demand driven and nationally, homeless levels have steadily increased over the last decade and continue to do so (an increase of 151 households in the last 12 months). This is largely due to the impact of welfare reforms and the unaffordable nature of the private rental market. However, these factors have been seriously exacerbated by the cost of living crisis, and the impact will continue to be felt with more business failures and rising unemployment. Furthermore, as government financial assistance schemes cease and an inevitable spike in private sector evictions occurs, all leading to considerable budget uncertainty throughout next year and beyond. It is therefore necessary to review the current policy framework with a view to maintaining the council's statutory homeless obligations but in a more cost effective and sustainable way. The policy changes proposed have been carefully considered and will help to reduce the budget pressure going forward.
45. The new approach is targeted at some of the most disadvantaged households and the new approach is in line with a recognition that we are spending more funds at a time the council's finance are under considerable strain as a result of COVID19.

Conclusion

46. Islington Council is working within a housing and homelessness crisis, and this is set against a backdrop of financial austerity.

47. The continued financial pressures faced by Islington Council have been exacerbated by the cost of living crisis and the proposed revised policies are required to balance these pressures against maintaining a provision of quality, affordable homes. We are still not able to re-house all the homeless people who approach the Housing Needs and Strategy service for housing advice, assistance and support within council and housing association homes due to the severe reduction in available social housing lettings.
48. Consequently, the council has experienced a significant increase in households in temporary accommodation from the 745 on 31 March 2018 to 976 as at the 1st of March 2023 (24% increase).
49. The current framework is still heavily reliant on rehousing homeless people in temporary accommodation which is causing extreme financial hardship for homeless people due to the expensive nature of this type of accommodation. If these homeless people could be rehoused into Private Rented Accommodation at the Local Housing Allowance rates, then the family's financial well-being would greatly be improved.
50. The current framework of rehousing homeless people into expensive nightly paid accommodation is placing severe financial pressure on the council, access to a greater supply of suitable and affordable good homes would help relieve some of this pressure.
51. Further to the Equalities and Health Analysis (Appendix 4) and quarterly briefings of the impact monitoring on these policies, the council will work in partnership with Crisis to fully review the policy implications of this report following the 12 month anniversary/implementation of the new policies.
52. The council will provide honest, transparent support and services to all homeless customers designed around the council's core principles.

Policy implications

53. The proposed policies take account of the existing overarching Council policies:
 - Achieve budget savings over the next three financial years to achieve the council's Housing Investment Strategy.
 - Provide clear leadership and management to ensure the council is able to deliver commitments as set out in the Housing Strategy and the action plans contained therein.
 - Look for housing solutions that consider how children will have the best start in life.
 - Delivering the Islington Homelessness Prevention and Rough Sleeping Strategy

54. Implications

a. Financial Implications

- i. It is not possible to quantify the financial impact of this report. The number of households impacted cannot be determined and nor can

the costs of the areas they are placed. There are some 'On-costs' that are not quantifiable, but likely to occur, such as:

- ii. The cost of travel for those being resettled out of the borough
- iii. The cost of any legal challenges or liabilities from those offered accommodation outside of the borough.
- iv. The cost of resettlement i.e. removal costs.
- v. It is arguable that even with the costs highlighted above, the overall net costs will fall if these recommendations are implemented. The average net cost to the Council of TA is high in Islington and invariably lower in other boroughs. The Housing Needs service will need to monitor the on-costs combined with the net costs of housing cases in other borough compared to housing cases in borough to ensure value for money is maintained at all times.

b. Legal Implications

- i. The proposed policies and procedures annexed to this report provide a framework for the provision of accommodation in discharge of the council's homelessness duties, which meet the legislative requirements of Part VII of the Housing Act 1996, statutory orders, guidance and case-law.
- ii. The council has a duty to provide temporary accommodation to homeless households:
- iii. (i) who are eligible for assistance and have an apparent priority need, whilst enquiries are carried out; or
- iv. (ii) where a full re-housing duty is accepted pending a final housing offer.
- v. Temporary accommodation offered by the council must be suitable and as required by s208 (1) of the Housing Act 1996 must be, so far as reasonably practicable, within the borough of Islington. In the case of *Nzolameso v Westminster City Council (2015)* the Supreme Court gave guidance that whilst it is lawful to provide temporary accommodation outside the borough, a local authority should have policies as to how temporary accommodation is procured and how it is allocated to homeless households.
- vi. The Private Rented Sector Offer Policy for Homeless Households sets out how the council will use its powers to make offers of private rented accommodation to discharge its duties to homeless households owed the prevention duty, the relief duty or the full re-housing duty.
- vii. The proposed policies and procedures also address the general duty the council is under, pursuant to s11 Children Act 2004, to have regard to the need to safeguard and promote the welfare of children within their area.

viii. In discharging its functions to homeless persons, the council must also have due regard to the Public Sector Equality Duty in s149 Equality Act 2010. This duty has been considered in the formulation of the proposed policies and procedures for the procurement of accommodation, the framework for temporary accommodation lettings and the criteria for the use of PRSOs.

c. Environmental Implications and contribution to achieving a net zero carbon Islington by 2030

i. There are no known environmental implications associated with this report.

d. Equalities Impact Assessment

i. The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.

ii. An updated Equality Impact Assessment (EIA) is attached at Appendix 4. Overall, the EIA concludes that not all of the potentially negative impacts on households can be mitigated, but that equality implications have been fully considered and that the policy approaches have been justified. It is required to consider the potentially negative impacts on protected groups and whether these impacts are justified by the council's wider objectives in implementing the policies. The impact of the policies and in particular the equality impact of the policies will in any event be kept under regular review.

55. Conclusion and reasons for recommendations

Risk Management Implications

56. There is a risk that there will be limited affordable private rented properties to meet the needs of homeless households. While the research gave an indication of different locations where properties may be available, market changes can happen quickly and the actual availability of properties depends on the willingness of landlords to let accommodation to homeless households. To mitigate this risk, incentives will continue to be offered to landlords to secure properties in line with local market intelligence.

The supply and availability of properties will be kept under review but it needs to be noted that building up supply to meet demand is likely to take time.

57. There is a risk of legal challenges where offers are outside Islington and potentially outside of London, or where shared accommodation is offered in light of Covid-19 risks. To minimise this, an individual suitability assessment will be carried out before an offer is made in line with legislation and statutory guidance.

Consultation

58. The council recently consulted residents and partners during the housing allocations scheme consultation exercise on the proposals contained within this report and the results of this consultation exercise are as follows:

59. The council received 950 responses from residents following the eight-week consultation period relating to the Housing Allocations scheme and the proposal received the following responses.

Prevention of homelessness by using the Private Rented Sector	66% of responses are in favour of the proposals	13% of the responses do not support the proposals	21% of the responses have no opinion.
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60. The new temporary accommodation framework promotes the council’s CARE values and makes Islington a more equal place to live.

Appendices:

Appendix 1 Accommodation Procurement Policy for Homeless Households

Appendix 2 Private Rented Sector Offers Policy for Homeless Households

Appendix 3 Temporary Accommodation Lettings Framework

Appendix 4 Islington’s Accommodation Procurement Policy for Homeless Households, Private Rental Sector Offer of Accommodation Policy and Temporary Accommodation Lettings Framework: Equality and Health Analysis

Appendix Five Quality Standard for homeless households living in temporary accommodation

Background papers:

- None.

Final report clearance:

Approved by:

Cllr O'Halloran Executive Member for Homes and Communities

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Appendix 1 Accommodation Procurement Policy for Homeless Households

Section 1: Introduction and Scope

1. This policy sets out:
 - Challenges facing the council in procuring accommodation for homeless households, both for temporary accommodation and for private rented sector offers (“PRSOs”) to discharge the council’s homelessness duties (see below for a detailed explanation of the differences between them).
 - The general principles that will be followed when procuring private accommodation for homeless households.
 - An estimate of the number of properties that are needed for these purposes and an action plan for meeting these needs.
 - An action plan for procuring properties for homeless households.
2. This policy will be monitored and formally reviewed after it has been in operation for 12 months and annually thereafter.
3. Temporary Accommodation comprises two forms of accommodation. First, emergency accommodation (called stage 1), for use during the relief stage of homelessness and provided to a household with apparent priority need whilst a household’s their homeless application is being assessed. Secondly, there is longer-term, (stage 2) accommodation. This accommodation is for households where the council has accepted a housing duty to them and is provided until suitable longer longer-term accommodation is available.
4. Stage 1 accommodation is generally ‘nightly-booked’ as it is only intended to be for short periods of time and is more expensive than longer term Stage 2 accommodation. In addition to this, the council has 69 reception centre spaces for general needs homeless households, which is cost neutral to the council.
5. The council has arrangements with local landlords and also a small number of registered providers (housing associations) to provide Stage 2 accommodation. In addition to these leased forms of accommodation, the council uses its own vacant stock which is decanted and planned for regeneration.
6. Private rented sector offers (“PRSOs”). These are offers made by the council to homeless households under either:
 - the prevention duty;
 - the relief duty; or
 - the full re-housing duty.

The offer made is of private rented accommodation on the basis of a fixed term Assured Shorthold Tenancy. The council has decided to make these offers to provide people with sustainable, affordable and more settled accommodation as an alternative to a long wait in temporary accommodation for social housing.

Section 2: Procurement challenges

7. There are severe constraints on the amount of temporary accommodation that can be procured from registered providers or by direct purchase. While the council will continue to pursue such opportunities where they are available, a key component in the council's procurement strategy is accommodation sourced from the private sector.

Accommodation Procurement Policy for Homeless Households:

8. The council aims to procure as much private accommodation for homeless households in Islington - or as close to it as practicable – as it can. This is the best way of helping households to remain in their communities and to enable the council to meet its legal duty to house homeless households in Islington wherever “reasonably practicable”.
9. However all local authorities are finding temporary accommodation increasingly difficult to procure to meet increasing demand, as the private sector rents increase and the number of landlords willing to let to households on benefits is reducing.
10. Securing private rented properties which are affordable to homeless households in Islington is extremely (and increasingly) challenging. Private rents here are amongst some of the most expensive in London (and, indeed, the United Kingdom as a whole) and the majority of homeless households have low incomes. Currently around 90% of the 930 households in temporary accommodation are in receipt of either Housing Benefit or Universal Credit.
11. Table 1 shows the difference between allowable temporary accommodation Local Housing Allowance (LHA) rates and average rents from the Government own data in Islington as at the 31st March 2023. The gap in the weekly rates is most pronounced for larger bedroom properties.

Table1:

Average Market Rent per month	LHA rates per month
Studio £940	£668
1 bedroom £1,450	£1,280
2 bedroom £1,880	£1,586
3 bedroom £2,100	£1,915
4 bedroom £3,250	£2,573

12. For vulnerable households struggling to pay their rent, initiatives such as assuring private tenants' rent may help to retain their tenancies and avoid homelessness. In exchange, the households must show the council that they have taken steps to increase or maximise their incomes, including by embarking on training programmes or engaging with the council's IMAX team.

13. The overall benefit cap for non-working single people is £296.35 per week and £442.31 per week for couples and families in London. It can therefore, be seen from table 1 the challenges homeless households face with the low benefit cap thresholds in London.
14. Considerable work has been done to procure and to retain as much temporary accommodation within (or as close to it as practicable) to Islington as possible. Rising rents and a very competitive market locally and in London is making it harder to procure new properties here or nearby. Frequently, given the current demand for rented property, when current leases end in Islington landlords often move into new markets for which they can achieve higher rents. The result is that emergency nightly booked is being used for longer periods after a housing duty has been accepted; this is helping to drive up the cost of temporary accommodation.
15. Rising homelessness levels across London and the resulting growth in demand have led to an increasingly competitive temporary accommodation market in London and the South East. Most London boroughs face similar challenges and are finding few properties with rents that are near LHA rates more difficult to procure.
16. The reduction in the household benefit cap for non-working households (from £26k to £23k in London for families and couples and from £18k to £15.4k for single people) will make it harder for all boroughs to find affordable private rented accommodation for non-working households. 1,094 households claiming Universal Credit in Islington as at the end of March 2023 have been Benefit Capped.

Section 3: Procurement principles

17. The following principles will apply when procuring properties for both temporary accommodation and private rented sector offers:
 - The council will act to ensure it is compliant with all relevant legal obligations and have regard to all relevant legal guidance.
 - The properties need to be affordable and sustainable in the longer term to the households that occupy them so they are within benefit levels and temporary accommodation subsidy rates. This will give homeless households the best opportunity to settle in an area and the lowest likelihood of them having to move again.
 - The properties we offer to households will be suitable, compliant with health and safety specifications and be in a decent condition.
 - The council's first priority will be to secure accommodation in Islington, where it is not possible to secure good quality affordable accommodation in Islington the council will next look in surrounding boroughs, then in other London boroughs and then in other areas increasingly further afield. The council will also work to secure accommodation for those households who wish to live outside of this area.

- Regard will be had to the Pan London Agreement on Inter-Borough Accommodation. This aims to ensure that where a borough is placing a household in temporary accommodation they will not offer the landlord more than the receiving borough would.
- Landlords may on occasions be offered incentives above temporary accommodation subsidy rates or LHA levels in order to procure properties to prevent homelessness - and where the practice will help secure longer-term savings. Where these incentives are offered the council will not offer more than the host borough if the properties are outside Islington.
- The affordability of properties will be a key factor when procuring properties. Properties should be cost neutral to the council and within allowable subsidy rates or benefit levels in order to meet budgetary targets. Over the last financial year temporary accommodation gross cost to the council is over £12 million as it has not been possible to procure properties within the subsidy rate.
- Where the council is procuring properties outside Greater London it will, as far as possible, focus on more urban areas whose diversity so far as practicable reflects that of Islington and so are likely to have more facilities and support networks for people from Islington with particular protected characteristics. Evidence of the scope and range of employment opportunities will also be taken into account.

Section 4: Estimating and meeting need

18. Temporary accommodation demand and supply comes from new households that are accepted as homeless and households that need to move within temporary accommodation (because they are overcrowded, for example). Homeless demand in the longer term is difficult to predict as it is driven by a complex range of socio and economic factors, including changes to national legislation and policy. A national shortage of truly affordable housing and unaffordable rents in the private sector in and around Islington remains an important driver. These factors have led to a continued increase in homelessness applications shown in the following tables:

Homeless approaches

Financial Year	Number of homeless approaches
2018/2019	853
2019/2020	975
2020/2021	1167
2021/2022	
2022/2023	

Numbers of homeless households living in temporary accommodation

31 st March 2020	749
30 th May 2021	930
31 st March 2022	848

19. The council is rolling out a policy to offer homeless households private rented tenancies to discharge the council's main housing duty (Appendix 2). This is intended to contain temporary accommodation demand and costs and to help give homeless households more sustainable, long-term housing options and avoiding the uncertainty of long waits for social housing. The focus will always be on the prevention of homelessness and the use of this policy is to improve the well-being of our residents.

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Appendix 2 Private Rented Sector Offers Policy for Homeless Households

Section 1: Introduction

1. The Localism Act 2011 (sections 148 and 149) introduced provisions which enable the council to bring its statutory housing duty under section 193 of the Housing Act 1996 as amended (HA96) to an end, by making an offer of a private rented sector tenancy rather than a social housing tenancy.
2. Amendments under the Homelessness Reduction Act 2017 extend the powers in the Housing Act 1996 to encourage local authorities to embed an approach to use private sector accommodation to discharge its Prevention Stage and Relief Stage duties to homeless households and households threatened by homelessness.
3. The aim of the Homelessness Reduction Act is to assist households with resolving their homelessness situation. Households that reject a private rented sector offer (“PRSO”) during the Prevention Stage and Relief Stage would still have the same entitlement towards be assessed for a full housing duty.
4. This policy sets out the basis on which the council will use these powers.
5. The policy should be read in conjunction with:
 - The Temporary accommodation lettings framework – this sets out how homeless households will be prioritised for private rented sector properties in different locations.
 - The Accommodation Procurement Policy for Homeless Households – this sets out the council’s approach to procuring private rented sector properties including those for PRSOs.

Section 2: Who private rented sector offers (PRSOs) will be made to

6. The council’s policy is that a PRSO may be made to any homeless household where the law allows it.
7. Paragraphs 1 and 2 set out the legislative framework where this can be applied.
8. The council will use the powers set out in the Homelessness Reduction Act to make PRSO offers to Prevention Stage and Relief Stage homeless households.
9. The council will use the powers set out in the Localism Act to make PRSO offers to accepted cases i.e. statutory homeless households to which the council owes the full housing duty (Section 193 HA96). The number of households that will be made a PRSO each year will depend on the supply of suitable private rented sector properties.
10. The following groups will ordinarily be excluded from PRSOs:

- a. Households eligible for sheltered housing - as it is unlikely that this type of housing can be provided in the private rented sector.
 - b. Households that need wheelchair adapted properties – as these can be hard to procure in the private rented sector.
 - c. Any household which the council determines would be unable to manage a private rented sector tenancy.
11. Exceptions may also be made for other households in respect of whom there is a compelling reason why a PRSO would not be appropriate. A decision will be taken after a consideration of each household's individual circumstances.
12. The following general principles will apply when making private rented sector offers:
- Two suitable offers will be made. Duty will be discharged to households that refuse the second suitable offer although households will have the right to challenge this through a statutory review.
 - Support to move may be offered. In the main this will focus on households that are relocating from London and will be tailored to the individual needs of each household and may include help to: transfer any care and support packages, access to employment support, enrol children in schools, and register with a GP and to access other local services. Support to other households that are not moving outside London may also be offered in some circumstances and the need for it will be assessed on a case by case basis.
 - The principles behind the accompanying TA Lettings Framework and the Accommodation Procurement Policy for Homeless Households will be applied when making private rented sector offers for available properties to appropriate households. Generally, this means we will only place households somewhere that is deemed suitable for them and we will seek to acquire properties within or as close to Islington as is possible.

Section 3: Reviewing and monitoring the policy

13. The policy will be reviewed after it has been in operation for twelve months and the outcome will be reported to the Executive.

Appendix 3 Temporary Accommodation Lettings Framework

1. Introduction

2. If you have approached Islington Council for housing advice and assistance and the council has been unable to help prevent you from becoming homeless, despite your co-operation, then the next step could be that you are offered temporary accommodation (TA).
3. The requirements for the provision of temporary accommodation are set out in the Housing Act 1996 as amended ('HA96'). This policy also takes into account the statutory requirements on local authorities in respect of suitability of accommodation, including Suitability Orders, case law, and the Homelessness Code of Guidance 2006.

2. Deciding on the right accommodation for you

4. When you ask for help with housing, we ask about your circumstances so we can decide how best to help you. For example, we will ask about:
 - What factors are putting you at risk or causing you to be homeless.
 - Where your children go to school and whether they have any special educational needs
 - Whether your children have exams in the next six months
 - Whether you or your children have any health needs
 - Whether your children are subject to a child protection plan
 - What GP or hospital you are registered with and what treatment you are receiving
 - Whether you work and how much you earn
 - What benefits you are claiming
 - What local services you are accessing, particularly whether you are getting support from social services
 - The potential relocation of families at risk of exploitation.
5. When we offer you temporary accommodation, we use the information you have given us to match you up with a suitable property. Due to shortages of properties available within Islington, unless you fall into one of the categories set out in the scheme as having priority for an Islington home, it is likely that we will offer you accommodation outside the borough. We will always ensure that any home we offer you is suitable for your specific needs.
6. Wherever possible, the Council will avoid placing: families with dependent children; pregnant women; and, young people aged 16/17 in shared bed and breakfast accommodation. Where no other suitable accommodation exists and such placements are necessary in an emergency situation, the Council will move these households to more suitable self-contained accommodation as soon as possible and within six weeks.
7. The types of accommodation offered. In most cases, while we work with households to resolve their homelessness, those eligible for temporary

accommodation will initially receive Stage 1 TA. This is 'emergency' housing booked for you on a nightly basis, like a self-contained letting in the private rented sector. Where possible, this will be self-contained.

8. If we have still not resolved your homelessness situation during the 56 day Relief Period and if the Council decides it has a duty to house the household (section 193 HA96), you will be moved to longer-term accommodation as soon as a suitable property becomes available. You are likely to remain in this accommodation while you wait for your 'final stage' home which could be in the private rented sector or social housing i.e. a council home.
9. **How the council finds temporary accommodation**
10. The council's Accommodation Procurement Policy for Homeless Households sets out how we obtain temporary accommodation and why an increasing amount of temporary accommodation is located out of Islington.
11. **Where the temporary accommodation is located**
12. The council aims to offer accommodation within the borough. However, Islington is one of the most expensive and highly sought-after places in the country to live and this means that there is not enough temporary accommodation available here for everyone. Where it is not possible to offer you accommodation in-borough, we will offer you a home that is as close as reasonably practicable to where you were living before you became homeless.
13. Since 2019, the number of households approaching the council because they are homeless has increased by 20%. This is due to a number of factors such as COVID19 Pandemic, Welfare Reform impacting households through the Benefit Cap, frozen Local Housing Allowance rates and the rising rental costs in London generally.
14. **Deciding who gets which property on any given day**
15. Every day, our Temporary Accommodation team obtains a list of all the properties that are available from our various suppliers. These could be 'nightly booked' properties that we use as emergency housing, or longer term 'stage 2' accommodation, and they could be located in Islington, in other boroughs or out of London.
16. Next, the team looks at the list of people who are currently waiting for an offer of temporary accommodation and matches each available property with the household whose needs match it. The team has a list of everyone waiting which includes information about how long they have been waiting and details of their particular circumstances and needs – such as what size, type, location of property would be suitable for them.
17. There are a huge number of factors to consider when allocating a property, for example – how big is it, does it have stairs, where is it located, is it 'nightly booked' or 'longer term', how close it is to public transport links. Our team

takes all these issues into account when making an offer. Whilst we would like to offer everyone a property in Islington, there simply aren't enough homes available here to do that. Therefore, we usually offer any available in-borough properties to households who have been assessed as needing an in-borough offer. Level access properties will usually be offered to those who have severe mobility needs or where someone uses a wheelchair.

18. On the rare occasions that we receive a property that is in particularly short supply, such as a very large home or a longer term, in- borough home and we do not have a family who has been assessed for that type of home waiting, we may decide to hold that property back until a family that really needs it comes to our attention. This is because we know that it may be a long time before another property of that type becomes available again and given the heavy demand we face from homeless families who need housing, it is very likely that in the next few days a family will come in whose need for that particular home are greater than those waiting today.
19. **Examples**
20. Every household's circumstances are different and we assess everyone on a case by case basis taking into account the full range of needs that the household has. As noted, our aim is to offer properties in Islington wherever we can but that in many cases, this may not be reasonably practicable due to a shortage of supply and requirements of suitability (including affordability).
21. The following are examples of the types of households who we would assess as needing to be housed in-borough, as needing accommodation within a specified travelling distance to Islington and those who could be housed further afield.

Band 1 – Islington and adjacent boroughs

- Children with a Statement of Special Educational Need, Children Leaving Care, Child In Need or Child Protection Plan receiving such a significant package of care from a variety of providers that transferring them elsewhere will create significant risk to the safety and sustainability of the caring arrangements.
- Households with complex needs who are engaged with services and where a move out of borough may severely disrupt this engagement thus creating significant risk to the safety and sustainability of the caring arrangements.
- Households who have a longstanding arrangement to provide care and support to another family member in Islington who is not part of the resident household and would be likely to require statutory health and social support if the care ceased.
- Any other special circumstance will also be taken into account.

Band 2: In borough or the rest of Greater London

- Applicants who have been continuously employed in Greater London for a period of six months, and for 24 hours or more per week. Women who are on

maternity leave from employment and meet the above criteria would also be prioritised for placements in Greater London.

- Applicants who have as part of their household, a child or children who are enrolled in public examination courses in Islington, with exams to be taken within the next six months.
- Relocation of families at risk of exploitation.
- Any other special circumstance will be taken into account.

Band 3: In borough or further afield

- Non-working households.
- Households with children at nursery, primary or secondary school, who are not sitting public exams.
- The household is receiving services locally but support could be transferred to another area without severely disrupting caring arrangements.

22. Vulnerabilities

23. Our scheme sets out how we determine who gets priority for in borough temporary accommodation, when there is not enough available for everyone.
24. The council has a duty to have regard to the need to safeguard and promote the welfare of children. If your child has a statement of Special Educational Need or is currently the subject of a Child In Need or Child Protection Plan, we will liaise with Children's Services to ensure that any offer we make is suitable and meets your child's needs. Where your child is currently in a public exam year, we will ensure that any accommodation offered is within reasonable travelling distance of school so they can continue their studies uninterrupted.
25. We also have a monthly liaison meeting with Children's Services where we discuss the needs of those families we know are threatened with homelessness so we can jointly plan how best to meet their housing and support needs in the future.
26. The council recognises that in many cases it may be in the best interests of children to remain at existing schools where they are settled. Unfortunately due to the difficulties in procuring accommodation referred to above it is not always possible to offer accommodation which avoids the need for parents to consider moving their child's school and we have to prioritise the needs of the most vulnerable children.
27. If your children are not sitting a public exam and do not have any special needs, you may decide that moving your children to a school nearer your temporary accommodation may be preferable to travelling back and forward. Section 14 of the Education Act 1996 requires that all local authorities provide school places for all resident children. Once moved to your new address, you can apply for a school place from the local council – in most cases the relevant forms are available on the council's website. If you need help with this, please tell us and we will be happy to assist.

28. Temporary accommodation offers and refusals

29. Applicants will be given two offers of suitable interim or longer-term temporary accommodation and they will be asked to accept the second offer straight away. There is no obligation upon the Council to enable applicants to view the accommodation prior to acceptance. In making the offer, the household's individual circumstances will be considered, taking into account the factors set out in section 2 of this policy and the Council's criteria on out of borough placements.
30. If an applicant is dissatisfied with an offer of temporary accommodation (which may include out of borough placements), they can lodge a complaint and provide their reasons. This applies to new applicants to whom the Council has an interim duty to accommodate under Section 188 (1) of the HA96, those where the Council exercise their discretion to accommodate under Section 188 (3) of the HA96, as well as those seeking a transfer from existing TA.
31. If an applicant refuses the second offer and the Council is satisfied that the offer was suitable then applicants will not be offered further accommodation and the Council may discharge its temporary accommodation duty towards them and the households will be required to make their own arrangements. There is no right of appeal against the suitability of accommodation offered to applicants under Section 188 HA96 (although they can apply for judicial review through the courts)
32. This also applies to all customers who are provided with temporary accommodation by the Council pursuant to its relief duties under S.189B HA96.
33. If an applicant is accepted as homeless and is owed a rehousing duty under Section 193 of the HA96, they can request a statutory review of the offer pursuant to Section 202 HA96 of accommodation (including subsequent offers where they are required to move to) within 21 days of the offer. The applicant can make representations in support of their review and the Council will consider the reasons given and undertake further enquiries as necessary. If the Council accepts the reasons for the review and agree that the offer is unsuitable, the offer will be withdrawn and a further offer of accommodation will be made. If a customer rejects an offer of accommodation and the Council determines that the accommodation is suitable, the Council will discharge its full housing duty towards the applicant and they will be required to make their own arrangements.
34. If the applicant is resident in emergency accommodation, they will usually be asked to vacate the property within 7 days and advised that no further assistance will be provided. If they are already in longer-term temporary accommodation, the current housing provider should be advised that the duty has been discharged.
35. Where applicants whom the Council has accepted a s193 duty refuse a suitable offer and submit a review request, they will only continue to be

accommodated during the review period in exceptional circumstances. Each case will be considered on an individual basis, taking into account the overall merits of the review request, any new information or evidence that may affect the original decision, and the personal circumstances of the applicant and the potential impact of the loss of accommodation.

36. **Properties for rent on property search websites**
37. You would have been issued with a Personal Housing Plan (PHP) when you approached our service for assistance. The PHP is a live document that sets out what steps you can take to prevent homelessness and may include advice about where to look for properties to rent.
38. If you would like to move to a private sector flat, please talk to us about this as we may be able to help you with a deposit and checking that the property is appropriate and safe.
39. Islington has on-going relationships with a variety of temporary accommodation providers and the majority of our available stock comes from these providers. Procuring temporary accommodation in this way allows us to obtain 'economies of scale' and best value from these arrangements.
40. We do not do 'bespoke searches' of property websites when trying to find temporary accommodation for our clients. This is not reasonably practicable given the inefficiency of this method. For example, we would have to check each property for quality before offering it to you, and most private landlords are unwilling to afford us the time to do this. Many landlords are not willing to let their properties to local authorities or those claiming benefits. We tend to find that many properties advertised are not actually available – rather the provider is offering an 'example' property to the market to attract the prospective tenant to their service. Finally, the majority of private rented accommodation available on the open market in Islington is very expensive and beyond the budget of those claiming benefits.
41. **The Islington Choice Based Lettings flyer**
42. The properties you may have seen advertised via our Choice Based Lettings are 'final stage' social rented homes. When we accept a duty to provide you and your family with accommodation, we add you to a housing register for these homes and you be allocated re-housing points in accordance with our housing allocation scheme.
43. There are not enough of these homes to go around and most people wait several years before they can be offered one. Your temporary accommodation is where you live while you wait.

Appendix 4

Islington's Accommodation Procurement Policy for Homeless Households, Private Rental Sector Offer of Accommodation Policy and Temporary Accommodation Lettings Framework: Equality and Health Analysis

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates
Accommodation Procurement Policy for Homeless Households, Private Rental Sector Offer of Accommodation Policy and the Temporary Accommodation Lettings Framework

Equality analysis author

Director Housing Needs and Strategy: Ian Swift

Department Homes and Neighbourhoods

Period analysis undertaken 1st April 2022 to the 31st of March 2023

Date of review March 2024

Section 2: Brief description of policy/decision/business plan

1.1 Brief description of policy/decision/business plan

This Equalities Impact Assessment (EIA) forms part of the review of the EIA assessment completed on the 1st March 2023. The initial assessment examined the impacts (individual and cumulative) of a suite of new Islington Council policies, providing the framework for the use of private rented accommodation to help meet the council's duties to homeless households.

These policies included the following:

- Private Rented Sector Offers (PRSO) Policy for homeless households – the policy sets out the council's intention to make more homeless households offers of private rented accommodation to discharge its rehousing duty to them.
- Accommodation Procurement Policy for homeless households – this explains the council's temporary accommodation needs, issues in procuring temporary accommodation and the principles the council will follow when procuring rented properties, both for temporary accommodation and private rented sector offers.
- Temporary Accommodation Lettings Framework – this sets out how households will be prioritised for properties, both for temporary accommodation and private rented sector offers, in different locations.

At the point of the initial EIA, the assessment was based on the available information prior to implementation. The policies aim to increase access to affordable and suitable accommodation that meets our Good Homes Standards. The new policies:

- remove restrictions on geographical limitations for procuring good quality homes,
- Confirm an approach to offer shared temporary accommodation for singles.

Legal framework

Within this EIA assessment, the legal requirements are set out confirm the operating perimeters applicable when devising the policies. This includes the Housing Act 1996 in which local housing authorities have duties to secure suitable accommodation for homeless people with a local connection and with a priority need, as defined in the statute. Where permanent housing cannot be provided immediately, homeless households are placed in temporary accommodation. The Localism Act 2011 gave local authorities the power to discharge this main housing duty to homeless households through an offer of an assured shorthold tenancy in the private rented sector, without any requirement for applicant's prior agreement. This change effectively ended the previously direct link between Parts 6 and 7 of the Housing Act 1996 because where a suitable PRSO is made by the council, the applicant no longer has priority for social housing. Until now, the council has only offered private rented tenancies to a small number of households, and with their consent.

The Homelessness Reduction Act 2017 also places Prevention and Relief duties on local authorities which can also include the provision to secure accommodation. The 1996 Act and supporting regulations require local authorities to place homeless households in borough wherever "reasonably practicable". Location is one of the factors that must be taken into account when considering whether temporary or permanent accommodation provided to meet any of the homelessness duties is suitable. The proposed amendments will continue to comply with the relevant legislation, government guidelines and case law.

Overall these policies are intended to ensure availability of enough suitable private sector accommodation for homeless households to allow the council to meet its duties at a cost that it can sustain and which are affordable to homeless households, against the background of an increasingly difficult market, marked by rapid increases in rent costs. Temporary accommodation already costs the council over £12 million per year, at a time when, in common with other local authorities, it faces medium-term financial pressures. This means that it cannot sustain an uncontrolled increase in costs. The policies will have the effect of off-setting the impact of continuing high numbers of homeless households presenting to the council and the loss of social rented supply.

Modelling suggests that without the policies the cost of temporary accommodation could increase by a further £500,000 in 2023/24. The policies are also intended to provide more certain and sustainable outcomes for homeless households, enabling them to secure suitable private rented housing more quickly rather than waiting in temporary accommodation for many years (and often subject to multiple moves over this time) until a social home becomes available. For other households, this approach will help free up resources that can be used to help prevent homelessness

from arising in the first place – the approach being given increased priority locally, regionally and nationally.

Details of each of the policies is given below:

Private rented sector offers (PRSO) policy

The private rented sector offers policy is needed to set out clearly and transparently how the council will use its powers under the Localism Act. The policy sets out council's policy intention to make more private rented sector offers to homeless households, where the law allows it. Homeless households might either be offered a private rented tenancy as soon as they are accepted as homeless or from their temporary accommodation – meaning they will spend less time in temporary accommodation. This will help to contain temporary accommodation costs which are described above.

Another of the policy's objectives is to help improve outcomes for homeless households. Currently, they can wait for more than 3 years in temporary accommodation for social rented housing (these waits tend to be longest for households requiring two or more bedrooms). Households often have to move a number of times within temporary accommodation. The nature of temporary accommodation therefore means it can be difficult for households to settle in an area, establish local links and get on with their lives. The policy (which will be backed by a package of support for the households concerned) is intended to help ensure that the offer of a private tenancy will mean that households can move into more settled accommodation that is affordable to them more quickly, enabling them to settle in a neighbourhood, engage with local services and opportunities and plan their futures with more certainty.

The current long waits in temporary accommodation are due to a significant mismatch between the supply of social housing and demand for it, at the beginning of March 2023, there are over 15,600 households on the housing register for social housing with around 976 of these being homeless households in temporary accommodation. Only around 1,000 social rented housing units became available last year in Islington and the nature of the social housing stock available is that a proportion of this is comprised of one bedroom units, while the great majority of homeless households (84%) require two bedrooms or more.

The council seeks to maximise provision of new affordable housing in the borough, including through its ambitious new build development programme, but the scarcity and cost of sites in Islington restricts its ability to meet increasing demand in this way.

These supply and demand factors are unlikely to improve as homeless acceptances are forecast to remain high at least in the medium term (primarily as a result of changes to the benefit system, COVID19, Brexit and poverty).

Social rented supply is also likely to reduce, at least in the short term, due to a number of national policies mainly imposed by the Housing and Planning Act 2016, such as the extension of right to buy to housing association tenants

Accommodation Procurement Policy

This policy is needed to provide an action plan for procuring enough accommodation both for PRSO and for temporary accommodation and to meet housing needs for temporary accommodation and to meet housing needs for homeless households. It is also needed to set out the principles the council will follow when procuring properties. Having such clear key principles is needed because although the council will, wherever possible, seek to acquire affordable accommodation within Islington and in neighbouring boroughs, this is becoming increasingly difficult, due to the lack of properties within benefit levels and subsidy thresholds.

A key principle for the procurement of temporary accommodation is that it is affordable to the council within relevant subsidy levels, in order to help to contain temporary accommodation costs and to prevent them from rising excessively.

Another key principle is that rents need to be affordable to low income people within benefit levels as otherwise it will not be sustainable to them in the long term. Both of these considerations are likely to become increasingly pressing if private sector rents continue to rise and the tendency for landlords to let to more affluent tenants continues. They are likely to be further exacerbated by the introduction of Universal Credit which has now been fully rolled out across Islington.

The policy also sets out other factors which will determine where properties are procured – these are needed to ensure the locations are suitable for homeless households and have health, social and employment opportunities.

Temporary Accommodation Lettings Framework

This policy is designed to complement the Accommodation Procurement and PRSO policies and is needed as the amount of housing available for temporary accommodation (and for private rented sector offers) in Islington and Greater London is likely to continue to decline while costs are likely to continue to increase. Although, as set out above, the council aims to place households in or as close to Islington as possible, where sufficient affordable accommodation is not available, it will have to seek alternative accommodation further afield.

The council therefore needs to prioritise households for properties in different locations in ways that take account of their needs. The particular focus of the policy is to prioritise allocation of accommodation in or near Islington to households with the greatest need to be housed there. These locations are grouped in bands:

- Band 1: Islington and adjacent boroughs
- Band 2: Greater London
- Band 3: Further afield.

The priority categories are designed to apply to those with compelling needs to be accommodated close to Islington or within Greater London. The needs of children and disabled people and by extension those who care for them are a particular focus of the priority categories.

Alongside this, some priority is given to working households. The council will also consider individual compelling claims to be entitled to locational priority which do not fit into the defined categories, on their own merits. Further, any offer of accommodation under the homelessness legislation is subject to an individual suitability assessment. These factors provide a safety net which allows for the consideration, for example, of cultural reasons for a particular placement which may affect certain ethnic minority households.

Proposed changes

The general trend of increasing number of homeless approaches to the council has been further exasperated as a result of the Covid-19 pandemic. The proposed changes have been suggested in order to meet the needs of our residents while also reducing financial expenditure.

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

Potential impacts (positive and negative) of proposed policy/decision/business plan

Potential health impacts (positive and negative)

There are some age ranges of the lead household member makes up the majority of homeless approaches and would therefore be subject to the be affected by changes to the policy.

Previously we had reported the age range of applicants making an approach consisted of households aged between 25-44. There is no significant change in this proportion of approaches.

Conversely, those aged over 65 are under-represented and so less likely to be directly affected. Households with children (or expecting a first child) are disproportionately represented among accepted homeless households (85%).

The proposed changes will positively benefit single residents aged between 18-35, as they will have greater access to a supply of accommodation that the council can offer. Conversely the council will be exercising the discharge of duty ability across all age ranges through the offer of one suitable offer.

Age - Children

The EIA identifies children will potentially be negatively affected if they need to move outside of Islington London. This is due to the potential requirement to start new schools, which can be disruptive particularly if they are at key exam stages. The policy and legislation however requires children taking exams not to be placed where this would affect their ability to attend schools. This also includes those attending specialist schools.

Age – Older people

Older people eligible for sheltered housing will not usually be made private rented offers. However older people could be offered temporary accommodation outside

Islington and London until this type of housing is available (although generally waits are much shorter). They may potentially be negatively impacted by this, if they have long established links to the local area and also as they are more likely to receive care and support packages which would need to be transferred.

Also they may be more likely to receive informal support, possibly from family members, which might be harder to sustain at a distance. The data shows that people in these age groups are significantly under-represented among homeless people however.

It is anticipated the good homes standard will have a positive impact upon households across all age groups as they will be able to benefit from a better standard of property.

Mitigating actions to be taken

Age – Children

Some children and families will be prioritised for in borough/adjacent borough accommodation, including:

- Households where at least one of the children has a Statement of Special Educational Needs or an Education, Health and Care Plan, is receiving education or educational support in Islington and where it is demonstrated that a placement would be significantly detrimental to their well-being
- Households with a child where Islington Family Services has demonstrated serious concerns about the child and is working with them intensively
- Households where there is a recommendation through a joint assessment with Children's and Adult's Services
- Households which include a registered Islington Council approved foster carer who is fostering a Islington looked after child
- Households which (a) include a Islington Council approved person who is caring for a Islington looked after child, (b) include a Islington child that is subject to a Islington Special Guardianship Order or (c) have a private fostering arrangement with a carer resident in Islington where they have notified the council.

Some children and families will be prioritised for accommodation in Greater London, where a child is at their final year of Key Stage 4 (generally Year 11) or in Key Stage 5 (A levels or equivalent Level 3 vocational courses, such as BTECs, or GCSE re-sits in English and Maths) at a school or further education college in London.

Any special circumstances demonstrating a compelling need for accommodation in a certain area will be considered and this might particularly benefit children.

Resettlement support will be offered for some private rented offers. This could include help to enrol children in new schools and to find nursery places.

Support will also be offered to households moving into temporary accommodation outside London and as above this could include help to enrol children in local schools and to find nursery places.

Age – Older people

Some older households will be exempt from private rented sector offers i.e. those that are eligible for sheltered housing and disabled households needing wheelchair accessible housing.

The focus on procuring properties and with good transport connections to Islington, where possible, will help people in temporary accommodation maintain their location connections and this might be particularly important for older people.

Support will also be offered to households moving into temporary accommodation outside London and this could involve help to transfer any care and support packages.

All residents placed in temporary accommodation or placed in private accommodation provided by the council will have a suitability assessment completed which will help to identify any of the above.

Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Only a small proportion of accepted homeless households have members needing a wheel chair adapted property or a level access property.

Overall, less than 1% of homeless households have members with a physical disability which impacts on the type of properties needed.

During the same period, the total applicants approaching with mental health or a learning disability is similar with 1%. This data relates to the main applicant and therefore it is likely that household members could be under reported. This is also reflected in the data as the majority of the applicants with mental health or learning disability are single applicants.

It is anticipated the good homes standard will have a positive impact upon households who have a disability as they will be able to benefit from a better standard of property.

Mitigating actions to be taken

We have reviewed the suitability assessment process to ensure all placements have a robust assessment completed when placed in temporary accommodation or placed in private accommodation provided by the council.

This will help to ensure any of the policy has been fully implemented and reduce unintended consequences of unsuitable placements. This must be audited at regular intervals.

The private rented sector offers policy excludes some disabled households who wouldn't be able to manage a private rented tenancy (for example, those who may

have care and support needs or a mental health condition which prevents them from managing a tenancy) and disabled households with members needing wheelchair accessible housing.

Some people with particular health problems or disabilities will be prioritised for in borough/adjacent borough accommodation, these include:

- Households where at least one member has a severe health condition or disability (including a severe mental health condition that requires intensive and specialised medical/mental health
- treatment/ aftercare that is either (a) only available in Islington or (b) where a transfer of care would create a serious risk to their safety or the sustainability of the treatment or care
- Households where at least one member is receiving support through a significant commissioned care package or package of health care options provided in Islington, where a transfer of care would create a serious risk to their safety or the sustainability of the care
- Some carers, and people being cared for, will be prioritised for in borough/adjacent borough accommodation

Resettlement support is offered to households being made private rented offers who are relocating out of London, and where needed where they are moving from Islington to another London borough. This support could include help to transfer care and support packages.

Support is also be offered to households moving into temporary accommodation outside London and as above this could include help to transfer care and support packages.

The Housing allocations scheme priorities households with physical disabilities to obtain accessible social housing. This is restricted to eligible households and therefore this will aim to meet the required need, limiting the need for a household with physical disabilities to move into private accommodation or temporary accommodation. While it is recognised the Good homes standard will generally be a positive change, there may be instances where the procurement process may involve additional amendments which would be suitable for the household. This will be processed on an individual basis.

Gender reassignment - The process of transitioning from one gender to another.

The council has begun including equalities questions about the sexual orientation and gender reassignment of the lead applicant for homeless households in the homelessness application. However, applicants can decline answering these and as this was only implemented in April 2021, it is too early to analyse any data collected.

There are no specific issues from the proposed changes which are felt could discriminate or disadvantage residents whom have undergone gender reassignment other than general matters detailed elsewhere in this report, and the significant reduction in the availability of affordable in Islington.

However that being said, transgender customers may be particularly at risk of housing crisis and homelessness arising from transphobic reaction by family, neighbours and members of the local community.

It is anticipated the Good Homes standard will have a positive impact upon households whom have undergone gender re assignment as they will be able to benefit from a better standard of property.

Mitigating actions to be taken

The focus on procuring properties in more urban areas, where their diversity as far as possible reflects that of Islington, might help to ensure there are facilities for transgender people, which may be more likely where the population is more diverse. In addition the focus on also procuring properties in areas with reasonable transport links to London might help transgender people in particular to continue to use local support services if there are fewer where they live.

Resettlement services provided to all residents placed into private and temporary accommodation to help link up with the relevant support. The Housing Needs and Strategy service has entered into a partnership with Stonewall Housing dedicated to provide support and advice to residents from the LGBTQ community. This will aim to promote the services and ensure any resident whom has gone through gender reassignment do not face any barriers to access social housing through the allocations scheme.

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination).

Our data shows that there are very little residents whom approach our service whom are married or have a civil partnership. Our current snapshot of data shows there are only 3% of households.

A joint income household will likely be able to have more disposable income. Therefore income assessments will take this into consideration when determining where an affordable property would be available in the private sector.

Lone parents are disproportionately affected by homelessness compared to their share of the population so are more likely to be affected by the policies.

The proposed changes to the policy are not likely to have an impact upon this specific group.

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection

against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

A significant number of lead applicants from accepted households are pregnant women.

A potential move outside of the borough for a pregnant mother or mother on maternity leave may impact upon services received from the health service. This will likely require services to be transferred to the new area if moved away from the area.

Additional properties identified further afield will assist in clients being offered permanent accommodation at an earlier stage and spend less time in temporary accommodation.

In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of pregnancy or maternity.

It is anticipated the good homes standard will have a positive impact upon households with a pregnant woman or a woman on maternity leave as they will be able to benefit from a better standard of property.

Mitigating actions to be taken

Every offer of accommodation will consider the household's individual circumstances and suitability of the accommodation offered to meet their needs. Any special circumstances will be taken into account when making offers to households – taking into account if there is a compelling need for the accommodation to be in a particular location. Resettlement support will be offered to households being made private rented sector offers where they are relocating out of London and where needed when they are moving from Islington.

Support will also be offered to households moving into temporary accommodation outside London. The completion of a suitability form will be completed for all households whom move into temporary or private accommodation.

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others.

A greater proportion of homeless decisions are made for ethnic minorities and therefore the policies will have a disproportionate effect on ethnic minority households.

Islington is ethnically diverse and this is reflective in the snapshot of residents in temporary accommodation with similarity to the population of Islington.

There may also be fewer cultural facilities for some ethnic groups in locations outside London, although this would very much depend on the area where the offer was made.

Poor quality information or language problems could impact negatively. English not first language – if households are allocated a private rented home they will need to receive adequate guidance to explain the rent charged and the ability to pay.

Members of gypsy and travelling communities may be reluctant to approach the Council for help due to suspicion of official organisations.

In addition to this, a lack of understanding of homelessness in gypsy and traveller communities means that this group may not be adequately planned for.

Larger properties with three, four, five or six bedrooms are often a requirement of some racial groups and lack of availability could disadvantage some families. The additional stock anticipated from procurement work further afield will be able to meet the needs of larger families.

In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of race.

It is anticipated the Good Homes standard will have a positive impact upon households across all races as they will be able to benefit from a better standard of home.

Mitigating actions to be taken

Places will be identified for procuring properties, where their diversity as far as possible reflects that of Islington, focussing on more urban areas where there are likely to be more facilities and support networks.

This might particularly benefit households of different ethnic origins. Procurement of properties outside Islington/London will, wherever possible, be focussed on urban areas in the South East in areas with reasonable transport links to Islington – in order to help households maintain local connections. This might particularly benefit households of different ethnic origins.

Discharge into the private rented sector decisions will be monitored by ethnicity. As applicants move on in the process, progress is monitored through the iWorld Northgate housing system which enables a series of reports that monitor by relevant equality characteristics.

All literature, forms and other information is readily available in the languages most commonly used. The Service ensures that people from whatever ethnicity can compete on an equal basis; this includes Gypsy and traveller communities. Translation services are made widely available. Islington has committed in the Homelessness Prevention and Rough sleeping strategy Action Plan to exploring factors behind BME households being over-represented as accepted homeless cases. With a better understanding it could be possible to improve prevention of homelessness in the first place.

The overall aim of this policy is to prevent homelessness and reduce the necessity for people to remain in inappropriate temporary accommodation. The delivery of the actions identified will have positive impact for BME, disabled and vulnerable, young

people and women, all of whom are over represented amongst those who are at risk of homelessness.

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Homeless applicants may, for example, regularly attend a place of worship. If they are allocated a private rented sector accommodation out of the borough it may make it difficult for them to continue to attend regularly.

Whilst the detailed recording of homeless applications and housing allocations by people of different faith groups can pin point adverse trends in relation to individual faith groups, the information should be treated only as an issue for further investigation since much will depend on the respective priorities of applicants and the particular areas they are aspiring to. Therefore, close monitoring in this area is essential to identify any patterns that may arise.

Please note that religion or belief alone would not have any bearing on the ability to access services. However this could impact on a household decision to move away for the existing community.

There is no evidence of inequality taking place as a result of the council homelessness work in this area.

It is anticipated the Good Homes standard will have a positive impact upon households across all faiths as they will be able to benefit from a better standard of property.

Mitigating actions to be taken

Sex - A man or a woman.

Women are disproportionately represented among lead applicants from accepted households.

Women are also more likely to be lone parents, who are disproportionately affected by homelessness in Islington.

Women are also more likely to be carers, who can be impacted by moves away from the people they are caring for, they are also more likely to be impacted if they move outside Islington and London and have to travel greater distances to maintain that care.

People with children, and lone parents (who are more likely to be women) in particular, will potentially be negatively affected if they move outside Islington and London as they are more likely to rely on local support networks for child care arrangements.

Households with children with special educational needs, where Family Services are working with them and where children are at key exam stages could be particularly affected.

Women of a working age are less likely than men of a working age to be in employment.

Women are 8 times more likely to be a victim of domestic abuse. Therefore, obtaining accommodation further afield will enable greater choice to women whom require permanent and temporary accommodation.

In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of sex.

Women are 8 times more likely to be victims of domestic abuse. Therefore they may require specific suitable temporary accommodation. The increase in the geographical area will enable the provision of more temporary accommodation available for this client group.

Mitigating actions to be taken

Some carers (who are more likely to be women) will be prioritised for in borough/adjacent borough accommodation.

Resettlement support will be offered for private rented offers which are out of London, and for moves within London where they are needed and this could include help to register children in local schools.

Support will also be offered to households moving into temporary accommodation outside London and as above this could include help to enrol children in local schools and to find nursery places.

Provision of temporary accommodation for victims of domestic abuse. Suitability assessments are completed to ensure victims of domestic abuse are removed from the areas of risk.

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

It is acknowledged that data on resident's sexual orientation has the potential to be inaccurate and on-going efforts should be made to encourage such information being given at the point of application.

While many people identify as heterosexual, many people also do not in the wider community. The Government estimates that approximately 6% of the population are gay men, lesbians or bisexuals.

Members of the LBGTQ community may face specific barriers not currently considered, and it may be that more information about this client group is needed.

Insufficient monitoring customer engagement and feedback means that it is not possible at this time to properly evaluate with any certainty what impact the service

has and whether some customers may be disadvantaged through their sexual orientation. There is a risk albeit small, that anyone in this position could be discriminated against and this could lead to an inequality in treatment.

A survey published in 2000, National Survey of Sexual Attitudes and Lifestyles, concluded that 5-7% of the UK population were likely to be lesbian, gay and bisexual. There is no evidence to suggest that people in these categories are likely to be disproportionately represented among those presenting themselves as homeless.

Homeless household sexual orientation information is inadequate but moves outside London may impact on the support networks and services available to Lesbian, Bisexual, Gay and Transgender (LGBTQ) groups, although there is no actual evidence of this, and it would very much depend on the location of any properties offered.

ONS data (2015) indicates that areas outside London have a smaller LGBTQ population. The proportion of the LGBTQ population in London is estimated to be 2.6% compared to 1.8% in the South East and 1.2% in the East of England. There may be impacts arising from the relative lack of support and other services designed specifically for LGBTQ people in some places outside London, but again this would very much depend on the area where the offer was made.

In assessing the policies, the changes have not identified any additional direct or indirect discrimination on the basis of sexual orientation.

It is anticipated the Good Homes standard will have a positive impact upon households across all groups as they will be able to benefit from a better standard of property.

Mitigating actions to be taken

The focus on procuring properties in more urban areas, where their diversity as far as possible reflects that of Islington, might help to ensure there are facilities for people of different sexual orientations, which might be more likely where the population is more diverse. In addition the focus on also procuring properties in areas with reasonable transport links to London might help people of different sexual orientations to continue to use support services, if there are fewer where they live

The Housing Needs and Strategy service responsible for the administration of the policies, have partnered with Stonewall Housing. This will help to continually examine the practices of the policy ensuring residents from the LGBTQ community are represented. Ensuring there is access to households from this group to access the service Stonewall Housing will focus on advice and advocacy including viewings, applying for benefits, referring to other agencies for assistance. In addition to the above, Stonewall Housing will focus upon wider community and outreach work.

It is acknowledged there is not an over representation of homeless approaches from the LGBTQ community and greater work must be completed to prevent homelessness. The Housing Needs and Strategy services will employ resettlement

officers to provide a customer care to all households placed out of the borough to ensure households have someone to contact regarding any issues.

Monitoring of this sector will enable specific issues for different segments of the population to be identified and addressed.

Human Rights

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol.

There are no anticipated negative impacts on Human Rights as a result of these policies.

Mitigating actions to be taken

None at this point. Will be reviewed as appropriate.

Further actions and objectives

- Ensure regular scheduled reviews and analysis of data is recorded.
- Improve our customer insight through focus group involvement and improved data collection.
- Develop appropriate early intervention and prevention measures to address any over representation.
- Develop improved understanding of why some BAME communities are disproportionately represented within homelessness services together with the development of appropriate early intervention and prevention measures to address this over representation
- Affects of the National Covid 19 pandemic on BAME, needs particular research and action in Islington, through close monitoring and work with public health.
- Ensuring households with mental health issues are able to successfully sustain a private tenancy. Resettlement service to ensure 12 month tenancy review are completed.

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HOUSING SCRUTINY COMMITTEE WORK PROGRAMME 2023/24

6 FEBRUARY 2024

- 1) Main Scrutiny Review 2023/24 -New Homes Build in Islington: witness evidence
- 2) Housing Scrutiny Committee Strategic Review of Overcrowding and Under-Occupation progress report.
- 3) Housing Ombudsman report and Action Plan
- 4) New Temporary Accommodation Framework
- 5) Work Programme 2023/24

18 APRIL 2024

- 1) Main Scrutiny Review 2023/24 -New Homes Build in Islington: – Witness evidence
- 2) Housing Performance Annual Report from Executive Member /Quarterly Review of Housing Performance (Q3 2023/24)
- 3) Communal Heating – 12 Month Report back
- 4) Housing Briefing on DAHA Accreditation
- 5) Work Programme 2023/24

13 MAY 2024

- 1) Membership, Terms of Reference and Dates of Meetings
- 2) Draft Work Programme 2023/24 and Potential Scrutiny Topics

20 JUNE 2024 provisional date subject to Annual Council in May 2024)

- 1) Draft Work Programme 2024/25

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