



CABINET

7.30 pm	Wednesday 20 October 2021	Council Chamber - Town Hall Hybrid Meeting
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Members 8: Quorum 3

Councillor Damian White (Leader of the Council), Chairman

Cabinet Member responsibility:

Councillor Dilip Patel

Deputy Cabinet Memembr for Business Recovery

Councillor Robert Benham

Cabinet Member for Education, Children & Families

Councillor Osman Dervish

Cabinet Member for Environment

Councillor Joshua Chapman

Cabinet Member for Housing

Councillor Jason Frost

Cabinet Member for Health & Adult Care Services

Councillor Roger Ramsey

Cabinet Member for Finance & Property

Councillor Viddy Persaud

Cabinet Member for Public Protection and Safety

**Andrew Beesley
Head of Democratic Services**

**For information about the meeting please contact:
Debra Marlow tel: 01708 433091
e-mail: debra.marlow@onesource.co.uk**



**Please note that this meeting will be webcast.
Members of the public who do not wish to appear
in the webcast will be able to sit in the balcony,
which is not in camera range.**

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Members of the public are entitled to report on meetings of Council, Committees and Cabinet, except in circumstances where the public have been excluded as permitted by law.

Reporting means:-

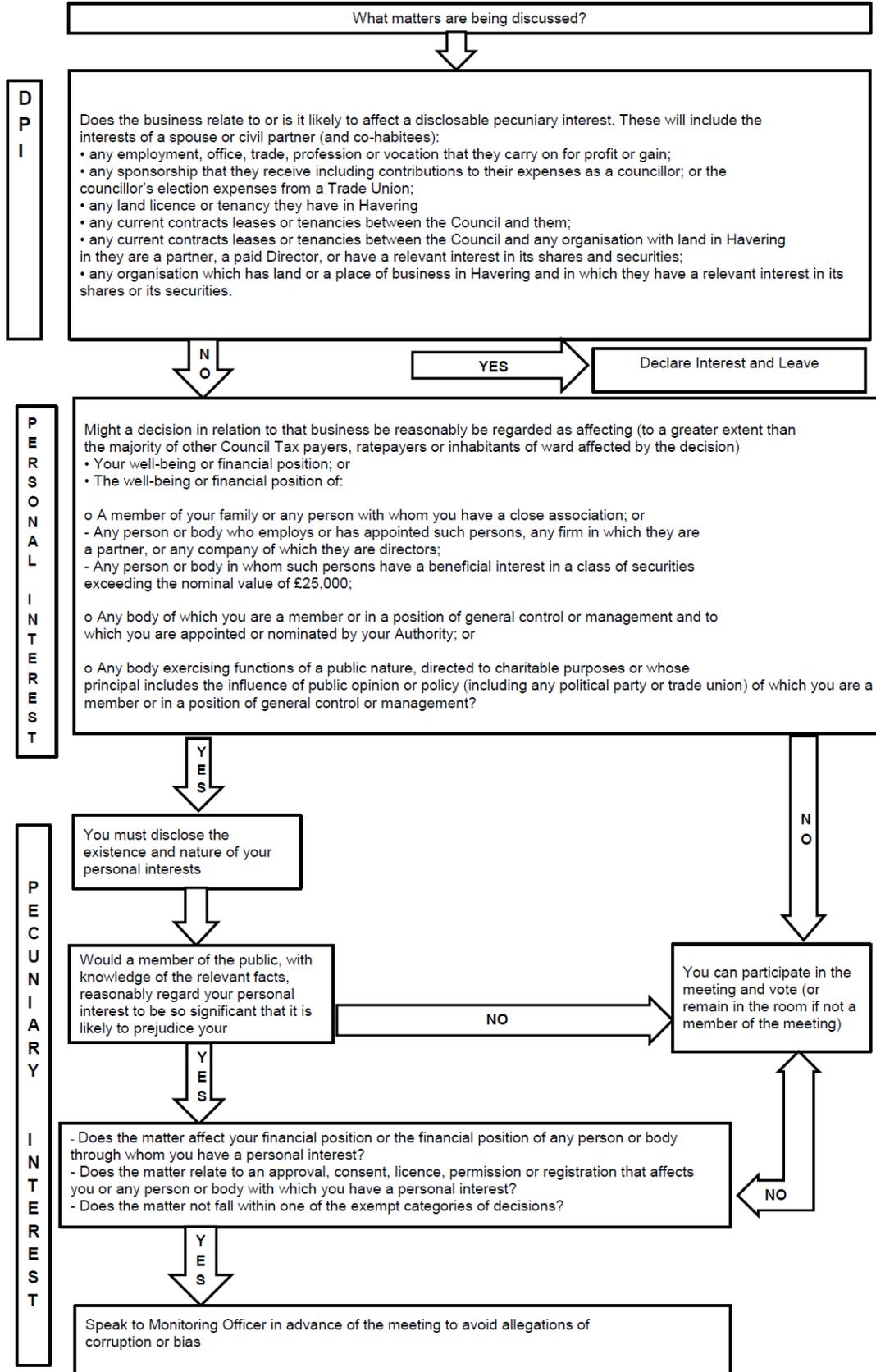
- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing, so that the report or commentary is available as the meeting takes place or later if the person is not present.

Anyone present at a meeting as it takes place is not permitted to carry out an oral commentary or report. This is to prevent the business of the meeting being disrupted.

Anyone attending a meeting is asked to advise Democratic Services staff on 01708 433076 that they wish to report on the meeting and how they wish to do so. This is to enable employees to guide anyone choosing to report on proceedings to an appropriate place from which to be able to report effectively.

Members of the public are asked to remain seated throughout the meeting as standing up and walking around could distract from the business in hand.

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



AGENDA

1 ANNOUNCEMENTS

On behalf of the Chairman, there will be an announcement about the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

2 APOLOGIES FOR ABSENCE

(if any) - receive

3 DISCLOSURES OF INTEREST

Members are invited to disclose any interests in any of the items on the agenda at this point of the meeting. Members may still disclose an interest in an item at any time prior to the consideration of the matter.

4 MINUTES (Pages 1 - 8)

5 UPDATE OF THE COUNCIL'S MEDIUM TERM FINANCIAL STRATEGY (MTFS) AND BUDGET FOR 2022/23 (Pages 9 - 30)

6 HOUSING ALLOCATIONS POLICY 2021 (Pages 31 - 156)

7 HOUSING ASSET MANAGEMENT STRATEGY (Pages 157 - 222)

8 DECISION TO EXCLUDE THE PRESS AND PUBLIC

The report included in agenda item 8 contains exempt documents, namely Appendix A. Cabinet will consider whether the public and press should be excluded from the meeting on the grounds that it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public were present during that item there would be disclosure to them of exempt information within the meaning of paragraph 3 of Schedule 12A to the Local Government Act 1972; and, if it is decided to exclude the public and press on those grounds, Discussion of public papers can be transacted in public. Cabinet to resolve accordingly on the motion of the Chairman in relation to discuss on exempt matters.

9 PHISH - PRIVATE HOUSING INVESTMENT FOR SETTLED HOMES PROPOSAL (Pages 223 - 250)



MINUTES OF A CABINET MEETING
Council Chamber - Town Hall
Wednesday, 7 July 2021
(7.30 - 8.00 pm)

Present:

Councillor Damian White (Leader of the Council), Chairman

	Cabinet Member responsibility:
Councillor Dilip Patel	Deputy Cabinet Memembr for Business Recovery
Councillor Robert Benham	Cabinet Member for Education, Children & Families
Councillor Osman Dervish	Cabinet Member for Environment
Councillor Joshua Chapman	Cabinet Member for Housing
Councillor Jason Frost	Cabinet Member for Health & Adult Care Services
Councillor Roger Ramsey	Cabinet Member for Finance & Property
Councillor Viddy Persaud	Cabinet Member for Public Protection and Safety

1 APOLOGIES FOR ABSENCE

There were no apologies for absence.

2 DISCLOSURES OF INTEREST

There were no declarations of interest.

3 MINUTES

The minutes of the meeting were agreed as a true record of the same and the Chair was authorised to sign them.

4 CONSIDERATION OF THE REPORT OF A TOPIC GROUP - COVID-19 PANDEMIC COMMAND RESPONSE TOPIC GROUP

Cabinet were grateful for the care and work put into the Topic Group report and were very pleased to consider it.

At its meeting on 13 October 2020, Overview & Scrutiny Board commissioned a number of Topic Groups to review the impact of the COVID pandemic and the Council's response to it. The terms of review for this Topic Group was the Council's response to the COVID pandemic; specifically, the emergency planning arrangements and Communication strategy.

The Overview & Scrutiny Board recognised that the scope of the pandemic was such that commissioning a single Topic Group to assess its impact and the preparedness of the Council in responding to it was unrealistic. It therefore established three separate Topic Groups charged with exploring specific areas of interest.

The focus for this Topic Group concerned the Council's emergency planning arrangements and the operation of its Command Structure. It therefore concentrated on the following key areas:

1. Review the Council's influenza-pandemic plan and develop an understanding of the Council's Command structure. Challenge and review planning assumptions contained within the plan (was the response proportionate to the risk);

2. Understand and explore the relationship between the Command structure and the Borough Resilience Forum;
 - a. With reference to the Community Resilience Development Framework, was there sufficient support for individuals identified at being of greatest risk? How are we doing it and what worked well/not so well (lessons learnt)
 - b. Promotion of the pandemic plans/Command responses into Member organisations from the business and voluntary sector. How was it communicated and were there any areas for improvement?
 - c. Was the Resilience Plan tested pre-Covid? If so, what were the improvements gleaned from it?

3. Communication roles between Command, the Resilience Forum and Elected Members. How the council communicated government guidance on responding to the pandemic and impacts on service provision.

The findings and recommendations were discussed and welcomed.

Cabinet agreed to refer this matter to Full Council where all members could review and consider the recommendations

5 DECISION TO INCREASE ALLOWANCES AND BENEFITS FOR IN-HOUSE FOSTER CARERS.

Cabinet considered the report and noted that as corporate parents it is the ambition of members and the Council to recruit and retain the best foster

carers to provide the best possible care for the Looked After children in Havering.

This decision proposes to improve the offer to prospective and existing carers, by increasing some specific allowances to “in-house” foster carers, in addition to providing additional benefits such as council tax exemption, complimentary access to leisure facilities at borough leisure centres, free parking and free green bin collections for all in-house carers.

In spite of concerted efforts to recruit and retain, the Borough is no longer competitive as a destination for potential carers at levels 1-3. Many new carers come via word of mouth and feedback from the Havering Foster Carers Association is that our offer is no longer preferable to other boroughs and the independent sector. The Borough is not unique in this challenge; Ofsted published a national report in November 2020 noting that recruitment of in-house carers was a significant difficulty for all the local authorities and agencies used in their study. The shortage of suitable carers was the most significant barrier to making a good match with the child and ultimately a successful caring place for them.

The proposals were discussed and welcomed to fulfil the ambition to attract the very best carers for looked after children of the Borough. The Leader indicated this as firm intention now and for the future and all Group Leaders shared this ambition and agreed the recommendations.

Cabinet:

AGREED to increase both the support and the financial incentives provided to ‘in-house’ carers in order to increase retention of our in-house foster carers by:

- a. Increasing the financial allowances as set out in Appendix 1 one of the report and improve a comprehensive wrap-around support package as covered in this report;
- b. Approving Havering resident foster carers as a class subject to Council Tax Relief from 1 April 2021.
- c. Approving the amendment to the Council Tax Discretionary Policy to include Havering foster carers with effect from 1 April 2021
- d. Providing complimentary access to the borough’s leisure centres for in-house carers and children in their care;
- e. Waiving free green bin refuse collection charges; and
- f. Offering free parking in resident bays and council carparks borough-wide, this will not include paid for parking bays.

6 DECISION TO BEGIN A CONSULTATION IN RESPECT OF HAVERING'S STREET TRADING POLICY

The report was presented to Cabinet by Councillor Viddy Persaud. It was noted by Cabinet that Havering adopted Street Trading in 1999 as part of its Environment Strategic Policy. Following natural changes in the Borough since the adoption of the relevant provisions of the London Local

Authorities Act 1990 (as amended) in 1999 a new Policy is now required for street trading in the Borough.

A Street Trading Policy enables the authority to control various factors such as

- **Economic promotion**
- **Public order and decency**
- **Prevention of crime and disorder**
- **Public safety**
- **Effective traffic and pedestrian progress on the highway**

Before the authority can introduce a new Street Trading Policy there is a requirement under the London Local Authorities Act 1990 to consult on the proposed policy.

It is intended that this consultation follow the standard public consultation format and that additional direct consultation be focused on business users. In accordance with the London Local Authorities Act 1990 there will also be consultation with the Commissioner of Police of the Metropolis, existing street trading licence holders or bodies representing them, Highways, British Railways Board, London Regional Transport, Network Rail Infrastructure Limited and Transport for London.

There followed general discussion and particular concern was expressed regarding the safety of children around ice cream vans. This should be addressed in particular.

Cabinet:

APPROVED the commencement of a 10 week public consultation on a draft Street Trading Policy beginning on 1st September 2021.

7 EAST LONDON JOINT RESOURCES AND WASTE STRATEGY - APPROVAL OF PUBLIC CONSULTATION

Councillor Osman Dervish was delighted to present this report to Cabinet and recommend the proposals within it.

The Preliminary Draft of the new East London Joint Resources and Waste Strategy (ELJRWS) had been developed in close cooperation between officers and Members of the Partner Authorities and could be seen at Appendix 1 of the report.

The Preliminary Draft of the ELJRWS will be subject to public consultation to understand the public opinion on its priorities and actions. Future service changes will be subject to consultation as appropriate in line with statutory obligations.

Councillor Dervish stated that this will allow residents who are increasingly more concerned with the reuse and recycling of waste to be sure that all available options are explored for disposal with a particular focus on ensuring that waste is reused and recycled where ever possible.

There followed discussion and Group Leaders were all in agreement with the recommendations.

Cabinet:

1. **APPROVED** the release of the Preliminary Draft of the East London Joint Resources and Waste Strategy (ELJAWS) and associated documents to the four statutory consultees (Environment Agency, Greater London Authority, Historic England and Natural England).
2. **APPROVED** the start of wider public engagement in line with the proposals in this report.
3. **DELEGATED** to the Director of Neighbourhoods in consultation with the Cabinet Member for Environment, the decision to make minor amendments to the proposal set out in this report. Such amendments will be limited to changes in the public consultation timeline and minor changes within the Strategy document.

8 EXCLUSION OF THE PRESS AND PUBLIC

Cabinet resolved to exclude members of the public and press for agenda item 10 and so the webcast was closed.

9 PUBLIC REALM TRANSFORMATION- NEW OPERATING MODEL

Councillor Osman Dervish presented the report to Cabinet who were addressed by Barry Frances and Peter Gay who gave a history of this matter to Members.

In September 2019, the Council started the procurement process for an integrated public realm services contract, tendering for a single contract to include waste and recycling collection, street cleansing, grounds and tree maintenance and associated services. Tendering had commenced but the outbreak of the Covid-19 pandemic introduced a period of uncertainty with bidders concentrating on service delivery and not new business jeopardising the procurement project plan timetable, leading to a significant risk that the programme would fail with severe disruption to services. Consequently, in September 2020 Cabinet agreed to stop this procurement.

The Public Realm Transformation programme has been reviewed again, concluding the market has now recovered to restart a procurement exercise. In the light of the previous Options Appraisal, Business Case and the present circumstances, three main service delivery models have been reconsidered:

- Continuing with the current operating model, with waste and recycling collection services and tree maintenance outsourced while street cleansing and grounds maintenance remain in-house. The Tree maintenance contract was extended for one year and is due to expire on 31st March 2022. The Waste and Recycling Contract will expire on 29th July 2023.
- Conduct a procurement exercise and engage an external contractor to deliver waste and recycling collection, street cleansing, grounds and tree maintenance and associated services in a single contract, or various permutations of these services to be included in the procurement with waste services
- Deliver public realm services through a Local Authority Company either by setting up a new company, using an existing company founded by the Council or partnership arrangement to deliver the services.

Assisted by Eunomia, a recent review indicates that the option likely to deliver the best outcome for the Council is to tender a waste and recycling collection service combined, and integrating, the street cleansing service. The research also indicated that retendering a standalone waste and recycling collection contract was likely to reduce bidder participation, reducing competition.

An integrated waste and recycling collection and street cleansing service contract will provide the Council opportunities to:

- Remove demarcation inefficiencies about who is responsible for litter and spillages in the street scene to achieve cleaner streets
- Improve supervision across waste collection and street cleansing services
- Share processes, procedures and ICT systems for swifter rectification of waste and street scene issues
- Lower its carbon footprint and improve local air quality with the introduction of ULEZ compliant vehicles, and may include electric and/or hydrogen vehicles where practicable
- Improve service performance within a framework of best value for money
- Increase value of the potential contract to the market which could lead to improved competition demonstrating value for money.

The recommendations were discussed and the other options available considered.

Following this consideration:

Cabinet:

APPROVED the new operating model whereby waste and street cleansing, trunk road cleaning, recycling collection and weed control services are

combined in one single integrated contract offering and the commencement of the procurement of that contract; and

DELEGATED authority to the Director of Neighbourhoods, in consultation with the Cabinet Member for Environment and Director of Legal & Governance, to take all necessary steps to award the contract post procurement at the estimated value of £10 million per year and deliver an integrated contract for street cleansing, trunk road cleaning, waste and recycling collection and weed control.

Chairman

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CABINET

Subject Heading:

Update of the Council's Medium Term Financial Strategy (MTFS) and budget for 2022/23

Cabinet Member:

The Leader, Councillor Damian White

SLT Lead:

Jane West
Chief Operating officer

Report Author and contact details:

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Policy context:

The report provides an update on the Medium Term Financial Strategy for the period 2022/23 to 2025/26. It also sets out the process and timetable the Council will follow in order to achieve a balanced budget for 2022/23 including proposals for consultation.

Financial summary:

This report includes:

- the current national funding outlook
- a summary of the Council's current financial situation
- the approach to setting the Council's 2022/23 budget and MTFS for the following years
- proposed arrangements for budget consultation

Is this a Key Decision?

Yes – Significant effect on more than two wards

When should this matter be reviewed? February 2022

Reviewing OSC: Overview and Scrutiny Board

The subject matter of this report deals with the following Council Objectives

Communities making Havering	[X]
Places making Havering	[X]
Opportunities making Havering	[X]
Connections making Havering	[X]

SUMMARY

The Cabinet and full Council last received a report on the Council's Medium Term Financial Strategy (MTFS) in March 2021 when the MTFS and balanced budget for 2021/22 was agreed. Since then the lockdown has ended and the Council has resumed many of its services. The post lockdown period has resulted in a significant increase in demand for Council services particularly related to Social Care. This report sets out how that increase in demand has affected the 2021/22 position and the steps the Council is taking not only to meet that demand but also to balance the 2022/23 budget.

This report updates Cabinet on the Council's current financial position. It presents an overview of the national economic and financial environment within which all local authorities are currently developing their financial plans in the medium term. It explains the continued uncertainty caused both by the pandemic and the Government's approach to financially supporting local authorities.

The report goes on to set out the Council's approach to achieving a financially balanced budget in 2022/23 and the medium term financial strategy thereafter. The report includes proposals for budget consultation during the autumn.

This report consists of the following sections:

- Background and strategic context
- Summary of the Council's current financial situation
- Update on the Medium Term Financial Strategy
- Proposals to close the funding gap

- Risks and uncertainties
- The proposed consultation process

RECOMMENDATIONS

The Cabinet is asked to:

1. Note the financial context and position set out in the report
2. Agree the proposed consultation process and associated timetable as set out in section 6.

REPORT DETAIL

1. Background

This report presents an update of the Medium Term Financial Strategy (MTFS) between 2022/23 and 2025/26 that will be developed to continue to deliver the Council's vision, objectives and priorities. The report includes an update on the current financial position as the Council continues through the recovery period following full lockdown. The Council needs to maintain tight financial control in this difficult period and the MTFS continues to ensure prudent levels of reserves and balances are maintained.

The pandemic has fundamentally changed the way the Council operates and has also presented emerging pressures particularly in increased demand for Social Care. North East London had the highest infection rates in the country and therefore had greater demand both into and out of Hospital. The number of hospital discharges to nursing homes has increased significantly in 2021. In the last six months alone there were 76 discharges to nursing homes whereas in the preceding 18 months there were 49. Whilst this rate will eventually flatten this is currently placing a huge pressure on care provision. In addition the number of cases in the learning disabilities section continues to rise and is expected to add over £2.5m in additional costs in 2021/22. These clients in general will require longer term care over many years and whilst every effort is made to both provide the appropriate care for the clients and minimise costs it is highly likely that this pressure will remain and indeed grow in the medium term

Havering is also experiencing additional pressures in Childrens Social Care following the pandemic. London went into lock down pre-Christmas before the rest of the Country resulting in a greater impact on children in the capital. The number of children with complex needs coming into the system continues to rise and there is a significant risk that there is hidden demand from the

lockdown which will only become apparent in the coming months and years. The risk extends to children with other complex needs such as learning disabilities and mental health and the numbers of new clients in the last few months indicate a significant pressure in this area. The number of Unaccompanied Asylum Seeking Children (UASC) children will swell considerably in the next few years based on the trend in the last few months and the information from the hub authorities in the south east.

The COVID pandemic has accelerated structural changes to the ways businesses operate. This has led to the decline of the High Street and town centres which is being experienced across the country including London. The pandemic has accelerated the decline of the local centres as increasingly people do their shopping online. Businesses have closed and the high streets increasingly risk being reduced to shops providing face to face services such as hairdressers, banks, bookmakers and fast food outlets. The sale of goods online has led to an increase in business in web-design, ecommerce, warehousing and logistics.

The decline of the local town centres also has a direct relationship with the level of crime and antisocial behaviour in an area. The current position has also reduced the amount of tax collectable in the system as businesses either reduce their footprint by going online or go into administration.

Leisure Centres were closed during lockdown and then had to adopt stringent social distancing measures when they were able to re-open. This had led to a reduction in footfall and whilst this is now recovering it will be sometime before the centres are operating at the levels planned before the pandemic.

These issues present pressures in the medium term financial planning process. The Council had anticipated these issues in setting the 2021 budget and medium term plan which identified a gap for 2022/23 back in March 2021. This has allowed the Council to work throughout the current financial year to close this gap and identify efficiencies and savings to balance the budget. This report sets out the updated budget and MTFs and sets out the proposed savings to close the budget gap.

The report also launches the budget consultation which will seek to gather views on these proposals from a wide range of partners and key stakeholders

2 National Update on the Government approach to the 2022/23 financial settlement

- 2.1 The Government have announced that there will be a 3 year spending review which will be presented by the Chancellor on 27th October.

SR21 will set out the following aims:

- Ensuring strong and innovative public services – making people's lives better across the country by investing in the NHS, education, the criminal justice system and housing;
- Levelling up across the UK to increase and spread opportunity; unleash the potential of places by improving outcomes UK-wide where they lag and working closely with local leaders; and strengthen the private sector where it is weak;
- Leading the transition to Net Zero across the country and more globally;
- Advancing Global Britain and seizing the opportunities of EU Exit;
- Delivering our Plan for Growth – delivering on the Government's ambitious plans for an infrastructure and innovation revolution and cementing the UK as a scientific superpower, working in close partnership with the private sector.

The Chancellor set the spending envelope for the next three years as part of the launch announcement on September 7th

The main points to note are:

- Core day-to-day departmental spending will follow the path set out at spring Budget 2021, with the addition of the net revenue raised by the new Health and Social Care Levy and the increase to dividend tax rates. The Government will make available around an additional £12 billion per year for health and social care on average over the next three years.
- This additional funding for health and social care allows the Government to announce an SR21 settlement for NHS England and Improvement rising to £160 billion by 2024-25
- In total, day-to-day spending will increase to £440 billion by 2024-25, increasing by nearly £100 billion a year in cash terms over the Parliament.

2.2 It is positive news in that public funding will not be reduced as part of any measures to balance the books following the pandemic but there still remains a distribution risk across public services. This announcement has allowed the Council to review its medium term plan assumptions which are shown later in this report. There remains significant medium term financial risk for Havering though until the distributional impact of the various reviews are announced. It is anticipated that next year's funding will remain similar to the current year's but beyond 2022/23 there is considerable continued uncertainty in respect of the following factors:

- The Fair Funding Review

The Fair Funding Review will review the formula used to distribute grant between local authorities. The formula will not be introduced before 23/24 at the earliest as further consultation will be required before proposals can be confirmed. This does not allow enough time for inclusion in the 2022/23 financial settlement to be announced at the end of this year. The early exemplifications of the review were adverse for London and the South East

and so there remains a risk that the introduction of the new formula will lose grant for Havering

- The levelling Up White Paper

The Government have promised a White Paper this year on levelling up. The result of the review is likely to be increased investment to tackle deprivation in targeted areas. It is unclear what the exact funding mechanisms will be for this investment so there is a risk that there will be a re-distributional effect away from London to support this initiative.

- Future Funding for Adult Social Care

The Government announced their plans for Health and Social Care on September 7th. The plan contained proposals for an increase in National Insurance to fund a lifetime cap on social care costs but did not address the long term funding issues faced by local government from an aging population with increased often complex demand. It is hoped that the Spending Review will fully commit to a long term funding plan for this area as well

- The 2021 Census

In 2021 there was a national census. The information from the census will be at some point introduced as source data for the distribution of the Local Government Finance settlement. This will create variance from the previously used ONS estimates and there will be a distributional effect on the grants for each authority. If the data creates a large variance in assessed need for an authority it is possible the new data will be introduced with transitional arrangements to smooth the impact over a number of years

- Business Rate Reform

The Government has promised an overhaul of the business rates system used to collect revenue primarily to fund local government. There are increasing numbers of businesses that operate remotely and service the online market. The current system based on rateable premises is outdated and need to be modernised to a fairer tax which captures revenue in a different way. It is unclear at this stage when this review will be completed and when the results will be introduced into the mechanism to fund local government.

3 The Council's Current Financial Position

- 3.1 The Council set a balanced budget for 2021/22 in March which included budgeted contributions to reserves in order for the Council to move towards its target of £20m general balances. Since then significant pressures have

emerged primarily in relation to demand and rising placement costs in Social Care.

The period 4 revenue monitoring report showed a potential overspend of £16.5m which includes both the increased demographic pressure on Adults and Children and the continued impact of the COVID pandemic on areas such as Leisure and Transport.

In Adult Services there are increases in both the numbers and complexity of cases. There are increasing client contacts to the Adult Social Care Front Door which are also indicative of current demand pressures including:

- increasing levels of complexity leading to significant increases in clients receiving one to one support or even double handed packages of care,
- increased complexity and new demand in supported living services,
- increases in homecare needs,
- and ongoing nursing care system pressure.

Demand and the unit costs for Adult Social Care is increasing which is shown in the tables below. This is reflective of the increasing complexity of placements post lockdown and the increase in nursing placements as a result of hospital discharges from the pandemic

Total Clients and Average Weekly Costs by Service Type									
Year	Homecare		Day Care		Direct Payments		Supported Living		
	Clients	Average Cost	Clients	Average Cost	Clients	Average Cost	Clients	Average Cost	
18/19	1,112	£ 215.48	92	£ 261.69	637	£ 284.05	151	£ 970.01	
19/20	996	£ 226.45	111	£ 282.80	689	£ 291.17	168	£ 1,071.33	
20/21	1,034	£ 253.83	102	£ 266.25	681	£ 310.86	188	£ 1,075.67	
21/22	1,050	£ 294.71	106	£ 258.95	656	£ 325.56	205	£ 1,125.90	

Total Clients and Average Weekly Costs by Service Type					
Year	Residential		Nursing		
	Clients	Average Cost	Clients	Average Cost	
18/19	433	£ 828.70	252	£ 601.06	
19/20	431	£ 879.36	277	£ 653.35	
20/21	418	£ 919.51	247	£ 775.90	
21/22	409	£ 963.49	297	£ 852.34	

Demand pressures are also increasing across Children's services. Havering received 824 referrals in the first quarter of 2021/22 (Apr-Jun). This equates to a rate of 558 per 10,000 children; the highest since 2017/18. The service completed 640 assessments in the first quarter of 2021/22. This equates to a rate of 434 per 10,000 children; close to the levels last seen in 2017/18. Also in the first quarter, 80 children were the subject of an initial child protection conference. This equates to a rate of 54 per 10,000 children; the highest seen since 2016-17.

Our ability to maintain a low "in care" population has been a success of the service since 2018; As a result 2020/21 saw very low numbers of children becoming looked after in Havering. However in the first quarter of 2021/22, the total number of children entering care was 34 which equates to a rate of 23 per 10,000 children; a level last seen in 2017-18. The proportion of entries to care due to Abuse or Neglect for this period has significantly increased, to 65% which is likely to relate to reduced visibility of children during lockdown measures and their needs now coming to the fore. The last four years has seen an increase in the number of young people with complex mental health needs, as well as those with learning disabilities. There are also an increasing number of young people in custody, some for the most serious of offences, alongside an increasing cohort of young people vulnerable to exploitation.

Over the last six months (Jan-Jun 2021) there has been a sharp increase in younger children (under 10) entering care. This trend, combined with the ongoing challenge of placement shortages (within Havering, across London, and nationally) made worse by the Covid-19 pandemic, is now resulting in higher placement costs.

Actions Taken to mitigate the Overspend

The Council has acted quickly to mitigate the reported overspend and has developed a robust action plan in order to control spend and minimise the impact of the increased demand in social care.

The action taken includes:

- All overspends to be reviewed and challenged to identify any non-recurrent Covid spend
- All use of consultancy to be reviewed by senior management
- All new one-off projects to be put on hold
- Recruitment Panel to refer new appointments to senior management for sign off
- Major contracts approaching expiry to be reviewed
- Contain Outbreak Management Fund to be examined to ensure the Council is funding all appropriate costs to the scheme
- Review of Planning to be undertaken including new funding from s106 or the Community Infrastructure Levy (CIL)

- Managers to review all vacancies to explore the possibility of different working opportunities
- Additional Business Grant Scheme to reviewed for potential savings
- oneSource to deliver in-year savings of £1 million
- Further in-year savings target for Havering services of £5 million to be spread across departments based on controllable budgets
- Review of the revenue implications of the Capital programme to take account of the latest forecast spend and use of internal borrowing

These steps will continue to be actioned through the remainder of the year but have already had a significant impact on the Councils position reducing the overspend to £14.1m in the Period 5 monitor. It is fully expected that the position will continue to improve through the remainder of the year as a result of the actions taken although this must be caveated with the backdrop of further potential social care demand increases from the fallout of the COVID pandemic.

The Council is confident that the actions taken will significantly reduce the overspend for 2021/22. Services are closely reviewing the current increase in demand to ascertain how much of the pressure is likely to continue in the medium term and how much is a short term position directly relational to post pandemic factors such as increased hospital discharges to nursing care. The outcome of these projections are included in the medium term financial strategy update later in this report.

4 The Council's Medium Term Financial Position

4.1 Forecasting the medium term financial position of the Council is a challenge with so much uncertainty about future service requirements and the ongoing impact following the COVID pandemic. The Council has been proactive in addressing this task and has used the following process to firstly establish the gap for 2022/23 and then to identify savings and efficiencies to close that gap.

4.2 Process to update the Medium Term Financial Strategy to identify the financial gap

We have updated the plan to take account of the following items:-

- Reviewed all other pressures in the plan including demographic and inflationary assumptions
- Reviewed all savings assumptions already built into the medium term financial strategy for 2022/23 and assessed the likelihood of their delivery
- Considered corporate adjustments that need to be made in order to recognise the ongoing impact of the pandemic including the ongoing impact of the increase in demographic demand
- Reviewed the local government funding settlement assumptions in the plan

The Medium Term Financial Strategy at budget setting in March 2021 forecasted the following future year gaps:

Description	2021/22	2022/23	2023/24	3 Year Plan
	£m	£m	£m	£m
Corporate Pressures	11.221	9.233	6.731	27.185
Savings proposals unachievable in 20/21 due to COVID	7.207	0.000	0.000	7.207
Demographic Pressures	3.131	5.026	4.923	13.080
Inflationary Pressures	3.436	2.537	2.557	8.530
TOTAL PRESSURES	24.995	16.796	14.211	56.002
Projected Changes in Government Grants	-2.012	5.505	0.000	3.493
Savings Proposals	-17.133	-3.354	-1.227	-21.714
Social Care Precept (3.0%)	-3.900	0.000	0.000	-3.900
Council Tax increase (1.5%)	-1.950	0.000	0.000	-1.950
NET POSITION	0.000	18.947	12.984	31.931

The Plan is a live document and is continually reviewed by senior management to ensure the projections are based on the most up to date data available. Since March the plan has been updated to reflect the following changes:

Corporate Pressures:

- The cost of Concessionary Fares and the Freedom Pass

The numbers of people using London Transport is still significantly lower than pre-COVID levels. This is particularly the case with Freedom Pass Holders which is reflected in the latest usage data. The Concessionary Fares settlement is reflective of data from usage over the previous two years and the continued low uptake has resulted in an expected reduction of £1.7m to costs for next year

- The Revenue cost of the Capital Programme

The Capital Programme has slipped significantly in 2021/22 within regeneration resulting in a re-profiling of the programme both in 2021/22 and in later years. The Council has also reviewed its opportunities for new capital receipts in order to fund

future expenditure and as a result is able to update its forecasts for both interest payable and MRP (Borrowing repayments). The revenue cost of capital financing for 2022/23 is expected to reduce by £2.0m from previous estimates as a result.

- Update on the Local Government Finance Settlement

There is still considerable uncertainty regarding the Local Government Finance Settlement and the various reviews that the Government have proposed in recent years. The Government have stated that there will be an Autumn Budget announcement on the 27th October. At the same time there will be a Spending Review to set out the plan for public spending over the next three years. The Government has stated that the spending control totals nationally will be in line with previous budget announcements and in light of that Havering is able to remove the prudent £2.0m pressure we had included in 2022/23 for loss of central grant.

- Update on Levies

The main Levy the Council pays each year is in respect of waste disposal to ELWA. (East London Waste Authority). In 2021/22 ELWA returned £5m of unused balances which the Council has applied to general balances. In 2022/23 the Levy is expected to return to previous levels and this had been forecasted in the MTFs. A further update and indicative levy is expected in December

- Planned Contributions to General Balances

The Council's General Balances stood at £10.9m on March 31st 2021 which is higher than was anticipated in the March 2021 budget setting report. The Council has a strategic aim to increase balances to £20m and has included in its balanced 2021/22 budget further contributions of £8m to general balances. (This includes a one off reimbursement of £5m from ELWA). This position allows the additional previously planned additional contribution of £2m to general balances (on top of the current base budget contribution of £3 million) to be removed from the 2022/23 budget plans

- Public Health Grant Shortfall

The medium term financial strategy for 2022/23 included pressures for Public Health in the expectation of both reduced reserves and additional burdens. The financial position of the Public Health reserve is better than previously anticipated which allows the planned budget contributions to be deferred to 2023/24.

Demographic and Inflationary Pressures

- Adult and Children's Social Care Demographics

Adult Social Care has experienced significant increases in demand during 2021/22. Some of the increases are a direct result of post lockdown period and can be expected to stabilise in the medium term. In particular there are increased numbers of clients with Learning Disabilities requiring Council support which is a major

pressure in the medium term. The main drivers of demographic pressures for Adult Social Care are:

- Increased discharges due to increased admissions into local hospitals since COVID
- Complexity of client conditions on discharge
- Increased support needs for existing service users not addressed during last 18 months
- A rise in carer breakdown after 18 months of lockdown (across all care groups) turning into placements in care homes and supported living schemes
- NHS Discharge Guidance - brought in to support the system during COVID – this led to discharges at higher NHS rates – these become very challenging to move onto LBH's usual rate
- High-cost placements for young people transitioning from children's services to adults

Children's services have been experiencing a significant increase in demand post lockdown causing a pressure on the revenue budget. This is causing pressures in supporting Unaccompanied Asylum Seeking Children leaving care and across placements generally. The numbers of children entering the system is at its highest for 5 years and the Council is showing an in year pressure in 21/22 to meet statutory demand.

The MTFs had already provided significant additional resources for both contractual increases and increases in numbers for both Adult Social Care and Children's Services. It is recommended however that additional funds are added to next year's budget to meet this demand. It is hoped that as part of the Local Government Finance Settlement further funding will be released to help mitigate this pressure. This increase will take the overall additional demographic provision up to £7m which is expected to be sufficient to meet new demand including the current year position.

- Inflationary Pressures

The Council has included provision in the MTFs for a pay increase of 2% and contractual inflation where it is apparent it is needed. The pay settlement is set nationally and contractual inflation requirements is explained in greater length in the Social Care sections of this report. It should be noted however that general costs of other services are increasing driven by increased wage costs, shortages of supply, energy inflation and difficulty in transporting goods through driver shortages. There is a risk that current budget levels may need to be reviewed in light of these increased inflationary costs

- Increase in National Insurance Contributions

The Government has announced a 1.25% increase in National Insurance contributions to help fund Social Care reforms. This is a direct pressure to the

Council which will need to be included in the MTFs. There is an additional risk that providers will levy the additional NI cost in their fees for placements to the Council.

- Inflationary increases in fees and charges

The Council has included in its planning inflationary increases in fees and charges. All fees and charges will be reviewed over the autumn to ensure that 2022/23 rates are both in line with market conditions but also reflective of the post COVID ability of customers to pay those charges.

Extension of Medium Term Financial Strategy to 2026

The medium term financial strategy presented to Council in March 2021 provided figures only to 2023/24. This was due to the extreme uncertainty at the time of future Government funding and the speed and length of the recovery period from the pandemic.

The position has now changed with the recovery period well underway and the promise of a three year spending review on the 27th October. Accordingly it is appropriate to extend the medium term financial strategy to 2025/2026. It is sensible and prudent to assume there will be inflationary and demographic pressures across this period so these have been introduced into the new updated plan

Summary

The table below sets out the changes to the Medium Term Financial Strategy and the forecasted current gap before any new savings and efficiencies are included.

	Movement in MTFs	2022/23	2023/24	2024/25	2025/26	4 Year Plan
		£m	£m	£m	£m	£m
	Opening Gap March 2021	18.947	12.984	0.000	0.000	31.931
	Reduction in Concessionary Travel Costs in 22/23	-1.693		0.300	0.300	-1.093
	Updated Levy Projections (ELWA)	0.954	0.109	0.521	0.555	2.139
	Updated Capital borrowing and repayment costs	-2.000				-2.000
	Updated Government Funding projections	-2.000				-2.000
	Updated Capital Financing Costs	0.059	-0.109	2.690	0.241	2.881
	Increase in National Insurance and other inflation	1.007		2.557	2.557	6.121
	Reprofile Public Health Pressure	-1.567	1.567			0.000
	Reduce budgetted contribution to balances	-2.000				-2.000
	Updated Demographic Pressures	0.501		3.500	3.500	7.501
	assumed taxbase growth	0.000	-0.500	-0.500	-0.500	-1.500
	Other adjustments	-0.350	-0.150			-0.500
	Latest Gap before Savings proposals	11.858	13.901	9.068	6.653	41.480

These changes result in the updated medium term financial strategy set out in the table below:

Updated MTFS	2022/23	2023/24	2024/25	2025/26	4 Year Plan
	£m	£m	£m	£m	£m
Corporate Pressures including govt grant	5.322	7.571	3.511	1.096	17.500
Demographic Pressures	5.527	4.923	3.500	3.500	17.450
Inflationary Pressures	3.544	2.557	2.557	2.557	11.215
TOTAL PRESSURES	14.393	15.051	9.568	7.153	46.165
Savings Proposals	-2.535	-1.150	-0.500	-0.500	-4.685
NET POSITION	11.858	13.901	9.068	6.653	41.480

Proposals to close the remaining Gap for 2022/23

The Medium Term Financial Strategy presented to Council in March 2021 highlighted a significant financial gap that would need to be closed in order to set a balanced budget for 2022/23. The Council has used its four key themes (Cleaner, Safer, Prouder, Together) to review processes over the summer in order to both deliver the key strategic aims of the Council but also to identify efficiencies and savings to balance the budget.

This work has continued through the summer and has resulted in a series of areas which the Council is considering to reduce costs. A key part of this process is gathering the views of key stakeholders including our partners and the general public. The Council is launching a budget consultation process this autumn which will gather those views in order that they can be considered by Councillors before the 2022/23 budget is set next year.

The main proposed savings are shown in the table below and then described in more detail in the paragraphs that follow. The anticipated savings exceed the current gap to allow an element of flexibility in reviewing the more detailed proposals:

Proposed Savings	Anticipated Value (£m)
Staffing reduction through efficiency	7.0
New Models of Delivery	4.0
Prevention	1.5
Better use of data through Business Intelligence	1.0
Regeneration proposals	0.5
TOTAL	14.0

Staffing reduction through efficiency reducing headcount by approximately 400 – (£7m anticipated saving)

- Undertake and Council wide review of staffing structures to delete vacancies, reduce management costs and remove activities that do not benefit residents.

- Reduce the Council's dependency on expensive agency staff and consultants.
- Improve retention, career management and succession planning.
- Create a One stop shop for residents for 'Life Events' or change of circumstances
- Review of Business Processes across the Council to deliver greater efficiency
There are a number of processes in the Council that have not been updated for some time. Technology has moved on significantly and in some cases systems have been introduced on a like for like basis, but the processes have not been changed to exploit the new capability or functionality within the system. There are also some process issues that are being highlighted through the Transformation Team service reviews.
- Review of oneSource – This would be a joint review with Newham to see if there are any further services that could be shared. In addition, the review of oneSource should include the potential to expand the reach of oneSource to include services in other councils.
- Efficiencies from the development of the Havering Digital Portfolio: - The Council has included significant investment in its current Capital programme to develop its digital offer. This is expected to allow significant efficiencies through modernising work processes and improving service offers to our customers and partners

New Models of Delivery – (Anticipated saving £4m)

- Strategic review of Passenger Transport
 - A full review of Passenger Transport is expected to improve efficiency through initiatives such as updated route mapping, reviewing taxi provision and reducing out-borough placements by accommodating children more locally.
- Preparations for the retendering of the waste contract
 - Initiatives to reduce waste, increase householder recycling and reduce overall tonnages collected. In addition initiatives aimed at recycling more materials
- Review of enforcement activity
 - Enforcement of high level environmental crimes resulting in increased income
 - Efficiency across all enforcement services via a locality approach and increased use of digital solutions.

- Front Door / prevention demand in Children's Services
 - Early Help Manager now based full time within the MASH, to ensure conversations regarding support and interventions, including cases stepping up or stepping down, are timely and effective.
 - Closer engagement with primary schools, aligned to early intervention principles and consistent with Ofsted feedback

- Placements / sufficiency in Children's Services
 - Fostering Cabinet decision to increase rates and benefits to 'in-house' carers to reduce the use of Independent Fostering Agencies, generating savings against IFA placements
 - Dynamic Purchasing System (DPS) to support the commissioning of some types of short breaks; being introduced for the commissioning of Semi-Independent accommodation, this will allow us to better manage the cost and quality of provision.
 - In house/local provision has been developed in the form of Park End, Widecombe and more recently Brunswick Court to accommodate young people leaving care. These provisions are giving us greater control over costs and quality of provision.
 - Longer term plans to develop a specialist residential and 6 bed short break unit in Havering for children with additional needs.
 - Potential sub-regional with Health to develop a bid that we can then submit to the DfE for capital funds to develop a sub-regional children home.

- Housing Services
 - Convert Royal Jubilee Court old building into supported housing - 5 units
 - Open two new complex needs HMOs for mental health - 16 units.
 - Introduce price per property repairs service for Private Sector Leased accommodation.
 - Additional support for hoarder/self-neglect tenants – enable tenants to remain in their homes longer.
 - Additional investment in in telecare/assistive technology - enable tenants to remain in their homes longer.
 - Under-occupation – buying properties at the sea-side to assist people to move out of their homes – saving on PSL and ASC costs in the long run.
 - Segregated waste for recycling in tower blocks.

- Adult Services
 - Reset Better Living model of practice (impacted by COVID) to scale up cost avoidance.

- Specialist resources engaged –to review all high cost placements and contributions from Health. This improves the robustness of how we challenge decisions we don't agree with. Resources are in place to undertake the reviews with some initial success already.
- is the Health system is employing nurses to review onsite all requests for one to one support to clients
- Council to approve all hospital referrals for care home placements following discharge
- Review of young people currently in transition moving through to Adult Social Care in next 12 months – to review current costs, and opportunities to jointly commission provision across the three boroughs Havering, Redbridge and Barking and Dagenham to reduce costs as these young people turn 18.
- Current high cost Learning Disabilities and Mental Health placements to be reviewed, looking at opportunities to reduce costs with collective bargaining power of Havering, Redbridge and Barking and Dagenham.
- Short term / medium term – consider building on success of Brunswick Court in creating temporary capacity in decanted sheltered schemes for short term service offer for young adults with Learning Disabilities, Autism and Mental Health issues.

Prevention – (Anticipated Saving £1.5m)

- Reviewing opportunities that the new Borough Partnership between the Health system and the Council gives us, particularly around the prevention agenda
- Long term sustainable funding to Local Area Coordination
- NHS Investment into Council's recovery plan.

Better use of data through Business Intelligence – (Anticipated Saving £1m)

- Data matching in relation to tracking people in temporary accommodation eg Private Sector Leased properties
- Bringing properties into Council Tax
- Removing erroneous Single Person Discounts
- Removing erroneous Freedom Passes
- Improving debt collection

Regeneration proposals – (Anticipated Saving £0.5m)

- 80-84 Market Place: This property is no longer managed by the Council and therefore carries no cost to LBH. Therefore the current budget of £32k is no longer required

- Social Value Sponsorship to an Existing Community Scheme or Project: There is an opportunity to utilise the Social Value programme to deliver a saving to the Council of around £40k, either through sponsorship from the JV/supply chain or by having partners deliver a Council project.
- General Fund Savings by Appropriating Acquired Bridge Close Assets to the HRA. This will generate a saving in borrowing costs to the general fund
- Corporate Saving - Potential acceleration of MLH Pipeline Schemes & will increase the revenue yield back from loans to MLH and enable these schemes to progress in order to deliver longer term solutions for the Council
- Impact of reviewing the Rainham Beam Park Joint Venture: Assessment of options to examine benefits to the Council from the Rainham joint venture.
- Review of all Regeneration JVs and major schemes with a view to speeding up schemes with long term general fund benefits
- Assess whether the management of new regeneration sites could be overseen by the Council and used to create income. Most sites will have outright sales and income could accrue to the general fund.
- Acceleration of works previously planned for 2022/23 in order to maximise use of Government Grants

Land review by Director of Regeneration to identify potential disposals. This potentially will create Capital receipts which can be utilised to partly fund the Capital programme reducing the need for long term borrowing

- Increased income from telecom masts
- Income from Electric vehicle charging points
- Refurbishment of white goods/furniture and onward sale through a social enterprise
- Monetisation of government credits – carbon neutrality, research & development (SMEs), recycling, new technologies
- Income derived from letting out council office space (suitable co-location with other public services)
- Central Romford business hub offering wraparound business support

5 Risks and Uncertainties

- 5.1 There are a number of risks associated with the current MTFS position. These include significant risks in relation to:

- Continued impact of the COVID pandemic particularly in relation to additional demographic demand but also in respect of the impact of the conclusion of Government support packages such as the furlough scheme
 - Central Grant Funding uncertainty. A three year spending review is welcomed but there is still a significant risk to Havering that the Government may change the distribution mechanism of funding adversely affecting Havering
 - The current year revenue monitoring position. There is a significant overspend in 2021/22 but it is fully expected that through robust and decisive action this position will improve considerably over the second half of the year.
- 5.2 The Council maintains a finance risk register and reviews it regularly in order to ensure that it has considered all risks in setting the budget each year. Assessment of the risks is also included in the S151 statement of robustness which forms part of the Council Tax setting report in February each year. The current financial risk register can be seen at Appendix B
- 5.3 Each year part of the Council Tax residents pay funds GLA services such as transport and the police. The Council is a collection agent for the GLA and has no control over how much this element of the Council Tax increases as the rate is set by the Mayor of London and the GLA Assembly. The GLA budget like all others has faced extreme pressures and difficulties due to the impact of the COVID pandemic. There is a risk to taxpayers that the Government will allow the Mayor to increase the precept significantly to recover a proportion of these costs. Whilst this will not impact on the Havering budget it would result in a Council Tax increase for residents.

6 Budget Consultation

- 6.1 Consultation on the budget is an important part of the annual budget cycle. It is proposed to consult with residents and key stakeholders on the impact of the COVID pandemic and how this has affected Council services. This will then inform the budget setting process in the new year. This consultation will be launched on 1st November 2021 and will run until 4 January 2022 .
- 6.2 The Council will seek views from the general public, all key stakeholders and business ratepayers during this period. The Council will run both an online consultation and also face to face sessions with a cross-section of the public to gather views on the difficult decisions the Council faces.
- 6.3 During the consultation period an All Member Briefing will be held and the Overview and Scrutiny Board have requested that this report be presented to the November meeting.

REASONS AND OPTIONS

Reasons for the decision:

The Council has a statutory obligation to consult on its budget proposals. This report sets out the proposed method to be used for the 2022/23 budget and MTFS. The Council strongly values the opinion of its residents and key stakeholders and welcomes their input into the budget process.

Other options considered:

N/A

IMPLICATIONS AND RISKS

Financial Implications and Risks

The financial implications of the Council's MTFS are the subject of this report and are therefore set out in the body of this report. The consultation process set out in this report will be used to inform decision making on the budget.

Legal Implications and Risks

Under S151 of the Local Government Act 1972 a local authority has to make proper arrangements for the administration of its financial affairs.

Under S28 of the Local Government Act 2003 a local authority has to review its budget calculations from time to time during the financial year and take appropriate action if there is any deterioration in its budget.

The Council is under a duty to "make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness." In accordance with S3 Local Government Act 1999. As part of that process it must consult tax payers, those who use or are likely to use services and others who may have an interest in an area where the Council carries out its functions.

The budget consultation and approval process is separate from individual decisions which may need to be taken for example in relation to service delivery; these may require a separate consultation process and equality impact assessment before a final decision is taken.

Where consultation is undertaken it must comply with the 'Gunning' principles;

namely it must be undertaken at a formative stage, sufficient information should be provided to enable feedback, adequate time should be given for consideration of responses and the feedback should be taken into account in any decision taken. The plans set out in the report in relation to the budget consultation comply with these rules.

Human Resource Implications and Risks

The Council continues to work closely with its staff and with Trades Unions to ensure that the effects on staff of the savings required have been managed in an efficient and compassionate manner. All savings proposals or changes to the funding regime that impact on staff numbers, will be managed in accordance with both statutory requirements and the Council's Managing Organisational Change & Redundancy policy and associated guidance.

Equalities and Social Inclusion Implications and Risks

Havering has a diverse community made up of many different groups and individuals. The Council values diversity and believes it essential to understand and include the different contributions, perspectives and experience that people from different backgrounds bring.

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:

- (i) the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) the need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are: age, gender, race and disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council demonstrates its commitment to the Equality Act in its decision-making processes, the provision, procurement and commissioning of its services, and employment practices concerning its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing of all Havering residents in respect of socio-economics and health determinants.

All front line proposals relating to the Medium Term Financial Strategy for the period 2022/23 to 2025/26 will be subject to an Equality and Health Impact Analysis or

assessment, which will be developed following the consultation process for inclusion in the further reports to Cabinet before the budget is finalised in February 2022. This will further highlight where the MTFs has the potential to positively impact on health and wellbeing of residents through targeted provision of services, and where any identified negative impacts may be mitigated.

BACKGROUND PAPERS

None



CABINET REPORT

20th October 2021

Subject Heading:

Housing Allocation Scheme (2021)

Cabinet Member:

Councillor Joshua Chapman, Lead Member for Housing

SLT Lead:

Patrick Odling-Smee, Director of Housing

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Policy context:

(a) This is a comprehensive revision of the Council's Housing Allocation Scheme (2016) to ensure that all available Council housing is allocated consistently, fairly and in compliance with all current legislative and regulatory requirements.

(b) This Scheme also takes into account the impact of COVID 19 on all affected stakeholders.

Financial summary:

It is anticipated that the implementation of this Scheme may involve minor financial implications.

Is this a Key Decision?

Yes. It will significant effect all wards in Havering.

When should this matter be reviewed? Two year from implementation.

Reviewing OSC: Towns and Communities.

The subject matter of this report deals with the following Council objectives

Communities making Havering	<input checked="" type="checkbox"/>
Places making Havering	<input checked="" type="checkbox"/>
Opportunities making Havering	<input type="checkbox"/>
Connections making Havering	<input type="checkbox"/>

SUMMARY

- 1.0 The Housing Act 1996 Part VI requires local authorities to publish an allocation scheme that sets out their policy for allocating affordable housing provided by the council or housing associations in the borough. Councils are required to give reasonable preference to certain categories of applicant and have due regard to statutory guidance and the law.
- 1.1 Demand for social housing in Havering significantly exceeds the number of properties available. In the financial year 2019-2020, only one in every 5 households on the Council's Housing Register had a realistic prospect of securing social housing.
- 1.2 This scheme (please see appendix 1) proposes a number of revisions to the current Scheme (dated 2016) to set out how Council housing is prioritised to ensure that it is fairly allocated to households in the greatest need.
- 1.3 It also sets out how the Council will enable access to other forms of affordable housing, such as shared ownership and intermediate rented housing.

RECOMMENDATIONS

1. To approve the Housing Allocation Scheme attached in appendix 1.

REPORT DETAIL

- 2.0 Following a review of the current housing allocation scheme, approved in 2016, the proposed Scheme, attached in appendix one was subject to statutory public consultation between January and April 2021. The outcome from the public consultation is attached as appendix 2.
- 2.1 The six year residency criteria has been retained as it has shown to ensure that social housing is allocated to local people who have made a long term commitment to living in Havering, and effectively helps us to managing the supply and demand for housing in the borough. The community contribution policy has also been retained, reflecting the desire to allocate housing to those who can demonstrate they have made a contributions to their communities through work and volunteering. The use of a banded prioritisation has been retained although the prioritising within the band has been amended to reflect current housing demand, see below.

2.2 The key changes to the Scheme are as follows:

2.2 Housing Register Qualification Criteria

- **Income cap**

The gross caps income cap for applicants has been amended, to between £36,000 and £50,000, to reflect changed affordability levels in the borough and households sizes. Applicants who come above this threshold will not qualify to join the Register. This will be reviewed annually by the Director of Housing and discretionary changes applied, where necessary.

- **Savings limit**

A savings limit of between £20,000 and £30,000 will apply depending on household size. This is because we are of the opinion that people should be able to save up for a deposit for acquiring accommodation without being penalised.

- **Residency criteria exemptions**

In order to comply with the latest legal position, a residency exemption will be granted to applicants of refugee status or from travelling community, provided they have resided in the borough for five years continuously and can demonstrate a community contribution such as paid, unpaid or voluntary work in the borough or being a recognised carer for an elderly person, or disabled adult or child. There are also exemptions for households that are members of the armed forces and those that fall within the reasonable preference categories under Part 6, Housing Act 1997.

2.3 Changes to the Housing Banding structure

- The number of applicable priority bandings offered to Housing Register applicants is to be re-configured.
- The introduction of a new band – Band 2C. This will enable those that wish to move to be allocated to the best level of banding based on eligibility. This action will reduce the size of those in the current Community Contribution level 1 band, now called Band 2A.
- Applicants previously placed under the Reduced Priority banding will no longer qualify for social housing, reducing the waiting list by around 200, unless they fall within a reasonable preference category and have access to the scheme.
- The full new banding structure is set out in the table below.

Band 1 – Urgent Need

Category	Criteria Guide
Urgent medical or disability (Reasonable preference category S.166A(3)(d))	This applies to an applicant, or someone in their household: <ul style="list-style-type: none"> • who is in hospital or residential care, and who cannot return home due to the unsuitability of the property; • who has a severe mobility issue; is housebound, and is unable to leave their accommodation without assistance that will result in a high risk to the applicant, household member or their carer/s.
Hardship and Welfare Criteria (Reasonable preference category S.166A(3)(c)-(e))	This applies to an applicant, or someone in their household, whose circumstances, or a combination of circumstances, are considered to be life-threatening, and where the need to move is supported by health professionals, the Council's Housing and Social Services, a senior Police Officer and/or a MARAC ¹ assessment.
Decants - major works or demolition (Reasonable preference category S.166A(3)(c))	This applies to secure Council tenants who are required to move because their current home is due to: <ul style="list-style-type: none"> • be sold, and/or • be demolished or • have extensive works completed, or • be refurbished (which may include conversion works), meaning that they will need to move out their current accommodation while the works are taking place. <p>Please note: that this condition does not apply private sector leased properties.</p>
Domestic Abuse (Reasonable preference category S.166A(3)(a)(d))	This applies to existing secure tenants of the Council, or spouses or civil partners of existing secure tenants (including where living together as husband and wife/civil partners), where they need to permanently leave or have had to already leave their current accommodation because they or a household member have been experiencing domestic abuse and it is unreasonable to expect them to remain at/return to the Council accommodation..

Band 2a

Category	Criteria Guide
British Armed Forces/Reserve Forces personnel	This applies to: <ul style="list-style-type: none"> • A household member who is, or has been: <ul style="list-style-type: none"> - a serving (or former serving) member of the British Armed Forces/reserve forces, and who has made a Housing Register application within five years of their discharge; - a serving (or former serving) member of the regular or reserve forces, who needs to move because of a serious injury, medical condition or disability sustained as a result of their service;

¹ MARAC - A Multi Agency Risk Assessment Conference (MARAC) is a victim-focused information sharing and risk management meeting. The role of the MARAC is to facilitate, monitor and evaluate effective information sharing to enable appropriate actions to be taken to increase public safety.

	<ul style="list-style-type: none"> - a bereaved spouse/civil partner of a member of the British Armed Forces, leaving Services Family Accommodation following the death of their spouse. <p>Members of the armed forces or their spouses do not need to demonstrate a community contribution.</p>
Working households	This community contribution priority is given to an applicant who is part of a working household in paid employment of more than 16hrs per person a week for a continuous period of 12 months
Disability	<p>This applies to:</p> <ul style="list-style-type: none"> • A household member who is disabled and under retiring age, and who has been assessed as eligible for the support element of the Personal Independence Payment (PIP) scheme, due to a permanent disability which prevents them from working or volunteering and therefore not able to give a community contribution.
Care Leavers	<ul style="list-style-type: none"> • The applicant has been accommodated by Havering Council's Children and Young Adults Services, and where it has been confirmed by the service that they are now ready to move on to alternative (e.g. independent or supported) accommodation. • The applicant has been assessed as having the life skills to manage a tenancy - including managing a rent account - and has the appropriate support package in place. <p>Care leavers do not need to demonstrate a community contribution.</p>

Band 2b

Council tenants, with a fixed term tenancy coming to an end, referred to a new property	This applies to situations where the Council originally intended to grant a new tenancy for the current property, but has subsequently decided to grant a tenancy of an alternative property. For further information, please view the Council's Tenancy policy .
Council service tenants where there is a contractual obligation	<p>The applicant is a Council employee who has been living in tied accommodation (i.e. provided to them as part of their work) but needs to move out due to:</p> <ul style="list-style-type: none"> (a) retirement, or (b) redundancy, or (c) the Council is changing, or has changed, the terms of the employee's employment.
Succession rights where property is not suitable	The applicant lives in a Council property and has the right of succession following the death of the tenant, but the property is too large; has had adaptations to the property that they no longer require, and/or there is an age restriction that renders them ineligible to hold the tenancy of the property.

Release of adapted property (Reasonable preference category S.166A(3)(e))	The applicant is a Council tenant who is willing to transfer to a suitable, non-adapted property and is releasing an adapted house or designated older persons property.
Under-occupation (Reasonable preference category S.166A(3)(e))	<ul style="list-style-type: none"> • The applicant is a Havering assured² or secure³ tenant who wishes to downsize. • Please note that this excludes tenants living in privately leased accommodation.
Foster carers referred by the Council's Children's Service (Reasonable preference category S166A(3)(d) or (e))	The applicant is a registered Havering Council foster carer where their current housing situation prevents them from being able to start, or continue to provide foster care or adopt.

Band 2c

Category	Criteria Guide
Volunteer (Reasonable Preference category s166A(3)(c) and (d))	A member of the household has been a volunteer or an unpaid worker for more than 16 hours a week and has been continuously for the last 6 months.
Carer (Reasonable Preference category s166A(3)(c) and (d))	The applicant gives care to a Havering resident that is substantial and ongoing.
(b) Move on from specialist accommodation (Reasonable Preference category s166A(3)(c))	<ul style="list-style-type: none"> • The applicant is moving on from specialist accommodation provided by either; Havering Council's Social Services Team, North East London Foundation Trust (NELFT,) or another registered supported housing provider in line with an agreement with Havering Council's Housing Service. • The applicant has been nominated as part of an agreement with a single homeless accommodation provider in Havering, where they are in need of settled accommodation and unable to secure it. • The applicant has been assessed as having the life skills to manage a tenancy, including managing a rent account and the necessary support package in place.
Homeless households owed a full homeless duty under section 193(2) or 195(2).	<ul style="list-style-type: none"> • Where it is in the overriding interest of the Council to prioritise an allocated place, in order to make best use of Havering's resources. • Where the landlord wants the temporary accommodation property back and where; a) the tenant has been in

² An *assured tenancy* is for a fixed period , for example; one year

³ A secure tenancy is for a lifetime period.

(Reasonable Preference categories s166A(3)(a)(b))	temporary accommodation for 7 years, b) the Council has been unable to find alternative suitable temporary accommodation (i.e. end of lease agreement).
Unsanitary conditions where the conditions pose an ongoing and serious threat to health (Reasonable preference category S.166A(3)(c))	<p>The applicant is the owner-occupier/private tenant and the Council's Environmental Health Team has determined that:</p> <ul style="list-style-type: none"> • the property poses a category 1 hazard under the Housing Health and Safety Rating System (e.g. crowding and space, excessive cold or risk of falls) and the Council is satisfied that the problem cannot be resolved by the landlord within six months, and • as a result, continuing to occupy the accommodation will pose a considerable risk to the health of the household (this would include properties that have severe damp and major structural defects such as subsidence, flooding, collapse of roof) or • the household is living conditions which are represent a statutory nuisance, and there is no prospect of the problems being remedied within a 6 month time period, or that; • as an owner-occupier/private tenant, the applicant has been issued with statutory notice by the Environmental Health Team, stating it is an unfit property to be demolished under the Housing Act 2004.
Reciprocal arrangement	The Council will only agree to reciprocal requests from other authorities and Registered Providers where they can demonstrate that there is imminent personal risk to the tenant or their family, and the accommodation is required in Havering, and that the reciprocal property being offered will be beneficial to Havering residents with high priority to move.

Band 3

People who have a need to move but do not qualify for Community contribution priority.

Category	Criteria Guide
Homeless households owed a full homeless duty under section 193(2) or 195(2). (Reasonable Preference categories s166A(3)(a)(b))	The Council has accepted a duty to accommodate within the meaning of the Housing Act 1996, Part 7.

Homeless Households (Reasonable Preference category s166A(3)(a))	People who are homeless or threatened with homelessness (within the meaning of Part 7, as amended by the Homelessness Reduction Act 2017).
Overcrowding (Reasonable Preference category s166A(3)(c))	The applicant is living in a property that has one or more bedrooms less than required under the Havering Council housing bedroom standard.
Applicants living in unsatisfactory housing lacking basic facilities (Reasonable Preference category s166A(3)(c))	<ul style="list-style-type: none"> • The applicant is living in a property without access to one or more of the following facilities:- <ul style="list-style-type: none"> - a bathroom or kitchen; - an inside WC, or - hot or cold water supplies, electricity, gas or adequate heating • The applicant lives in private property which is in disrepair and is unfit for occupation. <p>Please note that:</p> <ul style="list-style-type: none"> • Applicants who only have access to shared facilities do not qualify under these criteria. • The above applies to private tenants living in a property that has a Category 1 risk as defined by the HHSRS.
Moderate medical grounds (Reasonable Preference category s166A(3)(d))	<ul style="list-style-type: none"> • The applicant's housing is unsuitable for severe medical reasons or due to their disability, but they are not housebound or their life is not at risk due to their current housing. However, the housing conditions directly contribute to causing serious ill-health.
Need to move for care or support (Reasonable Preference category s166A(3) (c) and (d))	<ul style="list-style-type: none"> • The applicant needs to move to receive care that is substantial and ongoing; • The applicant needs to move in order to access Social Services facilities, and is unable to travel across the Borough; • The applicant wishes to move to a certain locality, where not doing so would cause hardship (which includes those approved under Right to Move Scheme).
Housing for older people (Reasonable Preference category s166A(3)(d))	<ul style="list-style-type: none"> • Older, or disabled residents, seeking sheltered or extra care housing who are unable to meet their housing needs from their own resources (i.e. asset rich but cash poor), but agree to lease their property to the Council to use as temporary accommodation.

2.4 Outcomes from the new bands

Increase priority has been awarded:

- to care leavers, as part of the council's commitment as a corporate parent,

- disabled households and those with medical conditions affected by their housing
- Working households, volunteers and carers
- tenants currently occupying their current homes, in order to enable them to move to smaller homes, thereby freeing up their homes for another family on the housing register.

Opportunities Register

The new scheme proposes the establishment of a new Opportunities Register that on which a member of the public can record their preference for housing options other than social housing. Applicants who are found not to qualify for the Housing Register will be referred to the Housing Opportunities Register. The Opportunities Register will also be used to market low cost home ownership products to local people.

REASONS AND OPTIONS

- 3.0 The recommendations throughout this report have been made so that the Council's Housing Register more accurately reflects the level of housing need in the borough, ensuring that those with the greatest need continue to be prioritised.
- 3.1 The table below shows the number of successful allocations for each band, under the current scheme, for the last four years:

Financial Year	ER	CC1	CC2	H	RP	Total
17/18	260	133	9	24	2	428
18/19	280	131	13	9	2	435
19/20	203	171	30	48	3	455
20/21	103	242	71	130	15	561
Average	211	169	31	53	6	470
Total	846	677	123	211	22	1879

3.2 Reasons for the decision:

- 3.3 The above table shows applicants in the Community Contribution bands make up the most allocations, accounting for 56% of allocations in the last financial year.
- 3.4 Home seekers make up the second highest proportion of allocations with 130 lets.
- 3.5 Interestingly, 26% of properties allocated to Home seekers were of family size (2 bed plus) with the highest proportion of successful applicants being 4 beds. Greater access to properties has presented better chances for applicants in the Home seeker bands to be successful in getting larger accommodation.
- 3.6 The Housing Act 1996 Part VI requires significant changes to the Housing Allocation Scheme to be consulted on with stakeholders and housing applicants.
- 3.7 Consultation with affected parties is essential to good practice. In terms of administrative law, 'consultation' has a specific meaning and should be proportionate, fair, and inclusive.
- 3.8 Following the authorisation of this draft Scheme, a formal consultation was conducted in the spring of 2021. The consultation was based on a proposed 10-year residency criteria and income thresholds, both of which have subsequently changed. The consultation consisted of:
- The draft Scheme and public consultation questionnaire published on the Council's consultation portal;
 - The questionnaire being sent to all key stakeholders, including housing associations, neighbouring boroughs and voluntary sector organisations.
- 3.9 129 people responded to the Public Consultation. Their feedback is detailed in appendix 2, with recommendations for the adoption of the Housing Allocation Scheme (2021).
- 3.10 The key issues raised in the consultation were:
- The concern that increasing the threshold will mean that poorer households will be excluded from the housing register. This is based on a misunderstanding that the threshold is the minimum that people can earn rather than the maximum, however in response to these concerns the thresholds have been amended to reflect different household sizes.
 - Concern was also raised about the impact of the continuous residency criteria on households who move out of the borough for a short time but return. There are exemptions in the Scheme that will enable some households, who have had to move for reasons beyond their control, e.g. domestic abuse, to still access the housing register.
 - There was also concern raised regarding the impact of the move from a residency criteria of 6 years to 10 on exiting households on the

Housing Register. As a result of the consultation and the updated EQHIA the decision was taken to keep the existing requirement at 6 years, with a 5 year mitigation for refugees and travellers.

3.11 Implementation of the new scheme

The implementation of the new scheme requires formal notification to be sent to all the applicants currently on the housing register, the housing computer system changed to reflect the new scheme, and the on-line application form to be amended to reflect the changes.

A project team has been established to implement these changes and it is anticipated that three months will be required from the date of decision before the new scheme “goes live”.

3.10 Other options considered:

No changes to the Scheme.

In this case, the Scheme would not comply with the relevant case law and would be subject to challenge through the courts and the Judicial Review process, ultimately at the expense of the local authority.

IMPLICATIONS AND RISKS

Financial implications and risks:

The implementation of this Scheme has minimal financial implications. However, there could be legal fees incurred in defending challenges against this Scheme. These costs would be met from Housing budgets.

Legal implications and risks:

- i. Pursuant to Section 166A of the Housing Act 1996, every local authority must have an allocation scheme and must not allocate housing accommodation except on accordance with the allocation scheme. The allocation scheme must include the procedure for allocation of accommodation as well as the persons or description of persons by whom decisions are made.
- ii. Public Sector Equalities Duty
The proposed changes relating to the mitigation to residency requirements, income threshold and savings limit are changes that are open to the Council to make. In deciding whether to implement the proposed changes, the Council must have regard to an Equality Impact Assessment and consider the impact each of the proposed changes would have on persons with protected characteristics with a view to eliminating any potential unlawful

discrimination. Where potentially negative consequences of the Scheme change have been identified, effective mitigation should be put in place to reduce the impact. Travellers and refugees have a protected characteristic of race, and who by the nature of their status will be less likely to satisfy a residency criteria. In the circumstances of these groups the residency requirement has been amended and is 5 years rather than the 6 year residency requirement for other applicants to the scheme. A failure to include an effective mitigation to the residency requirement for these groups could lead to the risk of successful challenge of the scheme by an applicant within this group. It is noted in the EQHIA that the impact on those with this protected characteristic is neutral/positive depending on the accommodation size required. Further the scheme is now including those who have a reasonable preference as being exempt from residency requirements and being able to access the scheme has been stated in the EQHIA to likely include those within the traveller/ refugee cohort. In particular with reference to refugees, the EQHIA notes that all of the data from previous years is that those who are refugees also had an accepted homelessness duty, and under the changes as set out in the new Scheme would therefore have access to the Scheme even if the residency requirement was not satisfied. This is due to the reasonable preference category exemptions to the residency requirement. As such, this appears on information from previous years to provide an effective mitigation to any discrimination that may be suffered as a result of the residency requirement for this cohort. The impact of the new Scheme should of course be kept under review as it is implemented.

The relevant legal framework for this exercise is set out in Section 149 of the Equality Act 2010 and known as the Public Sector Equality Duty (PSED).

iii. Reasonable preference groups and reduced priority banding.

It is a legal requirement under Section 166 A (3) of the Housing Act 1996 to ensure that 'reasonable preference' is given to persons falling within that section.

This section includes those who are homeless within the meaning of Part 7 of the Housing Act 1996, and not just those who are owed the full housing duty. Established case law supports the position that an allocation scheme should not seek to exclude groups of people within the reasonable preference categories.

The revised Scheme exempts those within reasonable preference groups from the 6 year continuous residency period, allowing these individuals to access the housing register. Recent case law in the Administrative Court has also confirmed that "the legislation does not prohibit a disqualification criterion that affects some persons falling within a reasonable preference category, provided that as a whole the scheme does give reasonable preference to that category of persons". As such the Scheme as proposed meets the statutory requirements around reasonable preference criteria, and

the latest line of case law. It is noted that this is a fruitful area of legal challenge and so decisions in the Courts will need to be monitored to ensure that the Council's Scheme remains in line. This can be done through the periodic review of the Scheme.

iv. Consultation, legitimate expectation and due regard to existing policies.

When considering the proposed changes, the Council is required to have regard to its internal policies, including the Homelessness Strategy and Tenancy Strategy. The Council is also required to have regard to the London Housing Strategy. The legal framework for this requirement is outlined below.

Section 166 A (12) for the Housing Act 1996 provides that:-

A local housing authority in England must, in preparing or modifying their allocation scheme, have regard to—

- (a) their current homelessness strategy under section 1 of the Homelessness Act 2002,
- (b) their current tenancy strategy under section 150 of the Localism Act 2011, and
- (c) in the case of an authority that is a London borough council, the London housing strategy.

Prior to making the proposed changes, the council should consult with stakeholder and those who could be affected by the proposed changes. Additionally, the Council has a statutory duty to consult with every private registered provider of social housing and registered social landlord as well as its secure tenants. The form of consultation should be inclusive and robust to ensure that the duty to consult is satisfied.

The relevant statutory framework is outlined below:

Section 166 A (13) of the Housing Act 1996.

Before adopting an allocation scheme, or making an alteration to their scheme reflecting a major change of Scheme, a local housing authority in England must—

- (a) send a copy of the draft scheme, or proposed alteration, to every private registered provider of social housing and registered social landlord with which they have nomination arrangements (see section 159(4)), and
- (b) afford those persons a reasonable opportunity to comment on the proposals.

(14) A local housing authority in England shall not allocate housing accommodation except in accordance with their allocation scheme.

Section 105 of the Housing Act 1985

Consultation on matters of housing management.

(1) A landlord authority shall maintain such arrangements as it considers appropriate to enable those of its secure tenants who are likely to be substantially affected by a matter of housing management to which this section applies—

(a) to be informed of the authority's proposals in respect of the matter, and

(b) to make their views known to the authority within a specified period; and the authority shall, before making any decision on the matter, consider any representations made to it in accordance with those arrangements

In addition to the above, the Council required to consult with those who would reasonably expect to be consulted. The Council should check and ensure that all those who were consulted when the 2016 allocation scheme was implemented (or when any previous amendments to the council's allocation scheme were made) are consulted also.

Prior to presenting this Scheme, extensive consultation in accordance with the statutory requirements has been carried out and the results of this exercise are set out in Appendix 2. The Council is required to take into consideration all of the information received from the consultation exercise when deciding whether to implement the proposed changes and in this case the result of the consultation have led to the proposed 10-year residency requirement having been kept at 6 years per the existing policy, with the relevant statutory and required exemptions to that residency requirement.

v. Part 6 Final Offer to Part 7 homeless applicants

Where an offer of accommodation under the Council's allocation scheme is made on the basis that a refusal would end the duties under homelessness legislation, the council must comply with the requirements of section 193 of the Housing Act 1996 which outlines the format for such an offer. The process regarding making an offer of accommodation is appropriately dealt with in Part 4 of the proposed Scheme, with the appeals process also detailed at Part 5.

Human Resources implications and risks:

The recommendations made in this report do not give rise to any identifiable HR risks or implications that would affect either the Council or its workforce.

Equalities Health and Wellbeing implications and Risks

It is anticipated that the implementation of this Scheme will generate positive health and wellbeing benefits to directly affected residents. Significant decisions entailed in implementing aspects of the Scheme will be informed by the accompanying Equality and Health Impact Assessment (EqHIA - please see appendix 3) which will serve to identify opportunities to maximise health benefits and mitigate potential harms arising from the specific actions proposed.

BACKGROUND PAPERS

APPENDIX 1: Housing Allocation Scheme (2021)

APPENDIX 2: Public Consultation report

APPENDIX 3: Equalities and Health Impact Assessment (EqHIA)

Housing Allocation Scheme

2021

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1. Introduction

Social housing is provided by social landlords – generally, local authorities or housing associations. However, it has been clear for some time that housing supply is not keeping up with demand. Affordable housing however is broader and includes all housing that has received a public subsidy or grant in its development.

Demand for social housing in Havering significantly exceeds the number of properties available. In the financial year 2019-2020, only one in every five households on the housing register had a realistic prospect of getting social housing. This scheme sets out how the council will prioritise access to the available housing.

1.1 Purpose of this scheme

The purpose of this scheme is to explain how Havering Council (“the Council”) decides how available social housing is allocated. It sets out the Council’s eligibility, qualifying and housing need criteria to ensure priority is fairly allocated in accordance with the statutory requirements and Council’s aims. It also sets out how the Council will enable access to other forms of affordable housing such as shared ownership and intermediate rented housing.

The Housing Act 1996 Part 6 requires local authorities to give reasonable preference in the way they allocate their available social housing to certain specified groups of persons referred to at 1.3 below.

1.2 Aims of this scheme

The aims of this scheme are to:

- ensure that we make the best possible use of the social housing stock;
- provide housing that is suitable to the specific needs and requirements of households;
- prioritise households that have been assessed to be in most need and to those who make a positive contribution to our community;
- reward residents with a long attachment to the borough;
- help build strong, mixed and sustainable communities and neighbourhoods,
- help applicants to make realistic decisions about their future housing prospects, by offering information on a range of options; and
- ensure social and affordable housing is allocated in a clear, fair and transparent manner.

1.3 Scope of this scheme

This scheme applies to new applicants, (including homeless households), and to existing Council tenants transferring from one property to another.

The Housing Act 1996, (as amended by the Homelessness Act 2002 and the Localism Act 2011), requires local authorities to make all allocations and nominations in accordance with an Allocation Scheme. A summary of the Allocation Scheme must be published and made available free of charge to any person who asks for a copy.

This document is available on the Council’s website: www.havering.gov.uk and a summary will be available as a paper copy on request.

The Housing Act 1996 (as amended) requires local authorities to give reasonable preference in their allocations policies to people with high levels of assessed housing need. The 'reasonable preference' categories are:

- People who are homeless as defined by the Housing Act 1996, Part 7;
- People who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985), or who are occupying accommodation secured by any such authority under section 192(3);
- People occupying insanitary or overcrowded housing, or who are otherwise living in unsatisfactory conditions;
- People who need to move on medical or welfare grounds (including any grounds relevant to a disability); and
- People who need to move to a particular locality in the district of the Council, where failure to meet that need would cause hardship (to themselves or to others).

The Council can also give additional preference to households in one of the reasonable preference groups listed above. By law the Council must give additional priority to applicants who are current or previous members of the armed forces and who are in housing need.

The Act also requires local authorities to state within the scheme what its position is on offering applicants a choice of housing accommodation, or offering them the opportunity to express preference about the housing accommodation to be allocated to them.

1.4 Timescales for this scheme

This scheme will commence on **XX XXXX** 2022. It will apply to all applicants whenever they joined the housing register.

1.5 Annual Lettings Plan

Each year the Council sets out an annual lettings plan. The purpose of the plan is to fulfil the Council's statutory and local lettings priorities as set out in this scheme. The plan will enable the Council to estimate:

- The number of Council and Housing Association properties likely to be available in the coming year;
- How many of these properties are likely to be allocated to particular banding groups.

In some instances, the estimated lettings figures in the annual plan may change due to the following circumstances:

- Where there are local lettings plans for particular developments, blocks of flats or roads (see section 3.6 for more information of local lettings plans);
- Where the Council wishes to fulfil a local housing priority or unforeseen circumstance during the lettings year.

Annual Lettings Plans are agreed by the Lead Cabinet Member for Housing.

1.6 Legal Context

This scheme complies with the principles, requirements and guidelines of the following:

- Housing Act 1996
- Children Act 2004
- Equality Act 2010

- Localism Act 2011
- Homelessness Reduction Act 2017
- Allocation of accommodation: guidance for local housing authorities in England (June 2012)
- Providing social housing for local people (December 2013)
- Right to Move (March 2015)
- Improving access to social housing for victims of domestic abuse in refuges or other types of temporary accommodation (November 2018)
- Homelessness Code of Guidance for Local Authorities (2018)
- Prevention of Homelessness & Rough Sleeping strategy 2020-25
- Havering Housing strategy
- Havering Corporate Plan
- London Housing strategy
- Domestic Abuse Act 2021

The Council reserves the right to expand, change or alter any element of this scheme, as and when necessary, in order to meet changes in housing demand, capacity, resources, relevant case-law and legislation.

1.7 Equality and Diversity statement

All applicants will be invited to provide details of ethnic origin, sexuality, disability and other equalities information. Provision of this information will not be obligatory or a requirement for acceptance of an application. Such information however will help the Council monitor the number and types of applicants with protected characteristics seeking housing and their position under the scheme, and therefore applicants will be encouraged to supply the relevant information to be used for this purpose.

Equalities data will be kept and monitored on a regular basis to ensure properties are being allocated fairly. This scheme itself will be monitored to ensure it does not operate in ways that discriminate against, or unfairly disadvantage, any particular group.

The Council will seek to ensure that this scheme is operated in a manner that is fair to all sections of the community. The information provided will be kept confidential and treated with respect at all times.

1.8 Data Protection Statement

The Council takes personal privacy very seriously and will never share an applicant's personal data without their prior knowledge and approval, unless required to do so by law. Section 166(4) of the Housing Act 1996 provides:

“The fact that a person is an applicant for an allocation of housing accommodation shall not be divulged (without his consent) to any other member of the public.”

For full details about how the Council protects personal data, please visit [Havering Council Data Protection Policy](#).

2. The Housing Register

2.1 Eligibility, qualification and housing need

The decision to accept an application to join the Housing Register will be made following an assessment of each of the following criteria:

- Eligibility – section 160ZA, Housing Act 1996;

- Qualification - set by the Council.

2.2 Eligibility

Only persons in one of the categories below will be eligible for social housing:

- i. United Kingdom citizens;
- ii. Certain Commonwealth citizens with a right of abode in the UK;
- iii. Those EEA nationals with 'settled status' granted under the EU Settlement Scheme will be treated as persons subject to immigration control and will have eligibility pursuant to reg. 5 of the Allocation of Housing and Homelessness (Eligibility)(England) Regulations 2006, Class C (subject to habitual residence).
- iv. Supreme Court upholds the judgment. Whether a local authority maintains a list of such persons or advises them of a possible future right (or both) is clearly a matter for each individual authority¹.
- v. Persons who are exempt from immigration control under the Immigration Acts, include diplomats and their family members based in the UK and some military personnel. This means that people subject to immigration control and certain other people from abroad, (outside the categories identified above), will not usually be eligible for social housing.

The Supreme Court will be considering the position of EEA nationals with pre-settled status - the subject of the Court of Appeal's recent *Fratila* judgment which determined that they will be treated as not being subject to immigration control and so, as has "always" been the case, their eligibility depends upon whether they are exercising a relevant EU right to reside (reg. 6(2), 2006 Regulations - eg. they are a worker or self-employed. That position is presently stayed.

Because of the uncertainty at present it is important that applications are made even where there is some doubt as to eligibility in order that each case can be properly assessed and determined.

2.3 Qualifications

To be placed on the Council's Housing Register, all of the following criteria must be satisfied:

i. **Age - Applicants must be 18 years of age or over**

The Council will not normally grant a tenancy to anyone under the age of 18 years unless another adult is prepared to act as their guarantor and hold the legal title to the tenancy in trust for the young person until they reach the age of 18 years, and agree to cover the rent or any arrears.

Exception: The age qualification criterion will not apply where a young person, aged under 18 years, is owed a duty under current legislation², but is unable to access suitable accommodation other than by being given an offer of council or housing association accommodation. In exceptional circumstances, the Council can grant permission to occupy a property to an applicant under 18 years by means of an Equitable Tenancy Agreement (and an adult will hold the legal title – see the paragraph above).

ii. **Residency - Applicants must have lived in the borough of Havering continuously for at least six years**

¹ Correct at the time of writing but may change as a result of changing regulations

² Under the Homelessness Reduction Act 2017 and the Children Act 2004

Local residency qualification within the terms of this scheme will normally mean that an applicant has lived in this borough continuously, through their own choice, (not through detention or hospitalisation), for a minimum of six years up to and including the date of their application. The applicant should remain resident in-borough in order to continue to qualify.

Time spent placed by the Council in designated temporary accommodation outside of the borough will count towards time spent in Havering.

Those placed in Havering via temporary accommodation, residential or supported housing by another local authority will not normally be considered as having met the local residency qualification.

Time spent away from the main/principal home in Havering due to periods of study, such as at university, will count as time in the borough.

Exceptions:

- a) The residency qualification criterion will not be applied to the groups specified in The Allocation of Housing (Qualification Criteria for Armed Forces)(England) Regulations 2012:
 - Members of the Armed Forces and former Service personnel, where the application is made within five years of discharge;
 - Bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner;
 - Serving or former members of the Regular or Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service.

- b) People who are under-occupying their current social housing tenancy.

- c) Persons who fall within the statutory 'reasonable preference' groups:
 - people who are homeless (within the meaning of Part 7);
 - people who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any such authority under section 192(3);
 - people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions;
 - people who need to move on medical or welfare grounds (including any grounds relating to a disability); and
 - people who need to move to a particular locality in the district of the Council, where failure to meet that need would cause hardship (to themselves or to others).

- d) Emergency cases where homes are damaged by fire, flood or other disaster - where it is not possible to repair the existing home, or if any work to repair is to take such a long period of time that there will be serious disruption to family life.

- e) Cases nominated under the Police Witness Protection Scheme or other similar schemes of which the Council has agreed to be party to.

- f) Households who need to move to the borough and where failure to meet that need would cause exceptional hardship to themselves or to others. Hardship grounds include applicants with the need to move:
 - Under the Right to Move scheme³ where there is a genuine intention of taking up an offer of work;
 - To specialist facilities where they receive care;
 - To receive or give care/support which could otherwise result in higher care costs, or even the use of residential care for those who cannot move.
- g) People who qualify for assistance through specialist external mobility schemes (e.g. Housing Moves, HomefinderUK⁴).
- h) Cases with exceptional need that are not covered under this scheme. For example, where child or public protection issues require rehousing, or for domestic abuse cases where it is not possible for the applicant to remain in their home.
- i) Applicants who the Director of Housing and, at the very least, one other statutory agency (e.g. the Police, NHS), has agreed are unable to access suitable accommodation other than that given by the Council or a housing association.
- j) To ensure compliance with the judgment of the Court of Appeal in *R (Ward & Ors) v Hillingdon LBC; R(Gullu) v Hillingdon LBC, Equality and Human Rights Commission intervening* [2019] P.T.S.R. 1738.

This paragraph applies to an applicant whose household is either Irish Traveller / Romany Gypsy or non-UK national with refugee status in the UK and who would qualify under the scheme for inclusion on the housing register, or once included be entitled to additional preference, but for their inability to demonstrate at least six years continuous residence in Havering.

If, in the opinion of the Council, such inability is the result of their racial origin or related circumstances or lifestyle, the residence requirement will in the case of each provision be reduced from six years to five years provided the applicant can demonstrate to the Council's reasonable satisfaction that they have for the whole or substantial part of that period made a community contribution such as helping borough residents, undertaking paid, unpaid or voluntary work in the borough or being a recognised carer for an elderly or disabled adult or child, or other special reason to be decided on a case by case basis by the Council.

iii. Tenure - Applicants must not be the owner of a residential property

People who singularly, jointly or part-own a property in this country or abroad, which is reasonable for them to occupy, will not qualify to join the Housing Register.

People who have previously owned a property and have sold it within the last five years will be asked to provide proof of the sale, together with evidence of the proceeds received from the sale and what has become of them.

³ Right to Move is a central government scheme to assist social tenants who need to move to take up a job or live closer to work.

⁴ Housing Move is a housing mobility scheme provided by the Mayor of London that allows tenants of London boroughs or housing associations to move outside their existing borough to a different part of London.

Unless they are unable to meet their housing needs from their own resources and require adapted or supported housing, they will not qualify to join the Housing Register.

Exceptions:

- a) Applicants where, at Housing Service's discretion, the Service is satisfied that the homeowner has exceptional circumstances. Examples include, but are not limited to, instances where they have a serious medical condition, are unable to remain in the property and are unable to afford suitable accommodation in the private market.
- b) Applicants aged over 55 years who have been assessed as being unable to meet their housing need from their own resources. The options for them will include the offer of being rehoused into sheltered or extra care accommodation and, in turn, agree to lease their property to the Council to use as temporary accommodation.
- c) Applicants who wish to be considered for low cost home ownership or intermediate rented products.

iv. Financial capacity.

Applicants whose income, savings and assets are above the level set by the Council will not be able to join the Housing Register, as they will be expected to meet their own housing needs or take up one of the other housing options in the borough through the Housing Opportunity Register.

This is because of the severe shortage of social and affordable rented properties in the borough.

Applicants will be asked about their income, savings and other assets when they apply to join the Housing Register. An income assessment will be made to assess whether they can afford to privately rent or buy in the borough.

The below table sets out the qualifying criteria based on financial caps:

Household	Income cap	Savings cap
Single	£36,000 per annum	£20,000
Couple	£36,000 per annum	£30,000
Family (three or more persons)	£50,000 per annum	£30,000

The Council will on an annual basis review the income threshold based on local housing costs and household incomes and publish a new threshold for the year. Any decisions to change the income threshold remains at the discretion of the Director of Housing. Applicants whose gross annual household income exceeds this amount will only be eligible to join the Housing Opportunities Register.

Income Assessments

Income assessments take into account the incomes of both the main applicant, their partner and any non-dependents. The assessment will include both gross income and income from benefits (excluding disability benefits). Households will not normally be placed on the Housing Register or offered social housing if their total income is above the set income level.

As part of the assessment, applicants will be asked to provide evidence of their household income, for example:

- Employed applicants – their last six months’ payslips.
- Self-employed applicants – their last 18 months audited accounts. These applicants will be asked to provide evidence of their savings and details of any assets owned, which include:
 - bank current account statements;
 - building society, post office or any other savings accounts statements;
 - details of any other financial assets, such as stocks and shares, premium bonds etc.

Applicants who deliberately deplete savings or move them into the accounts of other family members may be disqualified from applying to join the Housing Register and maybe prosecuted for providing false information.

Applicants who cannot provide satisfactory evidence of their household income, savings and assets, or who choose not to complete the savings and income section of the application form, will be treated as having sufficient resources to rent privately in the borough and will not be accepted on to the Housing Register.

Exceptions:

- Members or former members of the Armed Forces where financial compensation has been received due to injury sustained on active service, this will be disregarded from any financial assessment.
- There may be exceptional circumstances where there is a real emergency need to move. These will be considered on a case-by-case basis, with a decision being made by the Director of Housing in consultation with relevant partners.

v. Applicants convicted of or found responsible for unacceptable behaviour

Applicants who have been found responsible for unacceptable behaviour that makes them unsuitable to be a tenant will not be able to join the Housing Register. This type of behaviour would entitle the Council to take formal action against them. Examples of such behaviour include:

- Any person convicted of housing or welfare benefits fraud, where the conviction is unspent under the Rehabilitation Offenders Act 1974. The person may re-apply once the conviction is spent.
- Any person found guilty of sub-letting a Council or housing association property, or it being proved that they have done so in the civil courts.
- A person who obtains a tenancy by deception and/or false representations or omissions.
- A person who threatens, or uses, violence towards Council employees, contractors or Council members. This includes behaviour where there is persistent abusive or racist language directed at Council staff, Council members or other partner associations.
- Anti-social behaviour by the applicant or a member of his or her household which causes nuisance or annoyance.
- Racial harassment and hate crime.
- Transfer applicants who have caused damage or not looked after their property.

The Council will normally only determine that an applicant has been guilty of “unacceptable behaviour” where the Council or a current or former landlord of the applicant has successfully taken formal court action, civil or criminal, against the

applicant or a member of the applicant's household in respect of conduct, under any of the above headings by:

- the applicant;
- a member of the applicant's household;
- a visitor to the applicant's property.

Formal action will have had to have taken place within two years before their application to join the Housing Register and may take the form of:

- obtaining a legal remedy or criminal conviction;
- service of a possession notice, a pre-action protocol letter or other letter before claim;
- entry into an agreement for the purpose of avoiding/settling legal proceedings, including an acceptable behaviour agreement, and
- issue of an agreement to undertake works.

All applicants who do not qualify under this criterion may submit a new Housing Register application if their circumstances change and there has been a sustained period of change for at least the past year.

However, where the applicant has not complied with the terms of the formal action taken, (such as complying with a suspended possession order, or with an agreement to avoid or settle legal proceedings), or where new unacceptable behaviour has, in the Council's view, arisen, (whether or not further formal action has been taken in respect of it), the Council will normally continue the disqualification.

vi. Housing Need - Applicants must meet one of the housing need criteria.

Applicants who do not meet or breach any of the above criterion are considered not to have a housing need and will be signposted and given relevant information/advice to solve their housing situation. They will be held on the new Housing Opportunities Register, where the Council may contact them in relation to alternative housing options that might assist in securing suitable housing.

Exception:

- Applicants who are eligible for sheltered housing or other affordable housing products other than social housing.

vii. Formal action against an applicant already on the Housing Register

If formal legal action is taken against an existing applicant relating to the allocation scheme results in a successful prosecution or conviction, the Council will remove and suspend the applicant from the Housing Register for a period of two years. Any existing or pending offers of accommodation will also be withdrawn.

Exception:

The Council recognises that there may be exceptional circumstances where the only way an exceptional housing need can be resolved is through the use of discretion. From the outset, the applicant will need to give a firm assurance that the unacceptable behaviour will not be repeated.

However, it should not be assumed that this alone will be considered sufficient grounds to end to the matter. The discretion to waive this criterion in such circumstances will ultimately require the approval of the Director of Housing, or a delegated officer.

A person who is not permitted to join the Housing Register, or has been removed from the Housing Register has the right of appeal. Details about how to appeal can be found in section 5.1 of this scheme.

2.4 How housing need is determined

The following explains the grounds on which the Council determines housing need priority:

2.4.1 Medical

The medical element of the assessment is based on whether the applicant's health, or a member of their household's health, would improve by moving to alternative accommodation.

Consequently, medical priority is awarded according to the extent to which the health or welfare of one or more members of the applicant's household, is affected by their current housing conditions and the expected benefits of providing suitable alternative housing.

Applicants are asked to complete a Medical Assessment Form. A Housing Assessment Officer will consider the information supplied by the applicant, along with any further and necessary information supplied by other parties such as health professionals and housing officers.

Applicants claiming to have a severe and enduring mental illness will need to demonstrate that they currently have, or have recently had, access to Havering Mental Health Services.

Depending on the circumstances, medical priority can be awarded under the Band 1, Band 2a or band 3. The following table is used as a guide to how medical priority is determined:

Medical Condition	THE EFFECT OF CURRENT HOUSING ON THE APPLICANT'S HEALTH		
	Severe	Moderate	Low
Serious	Band 1	Band 2a	No medical priority
Moderate	Band 2a	Band 3	No medical priority

Applicants who clearly have an urgent need to move because they have a critical medical Condition, or very serious disability, will be placed in the Band 1 - Urgent Need.

2.4.2 Hardship & welfare

a) Young people leaving care

If a young person who has been looked after by the Council, including those who have been placed out-of-borough, is ready to move into their own accommodation, they may be considered for housing on welfare grounds. To qualify, a young person must have been a 'relevant child' under the Children (Leaving Care) Act 2000. This means that they would have been looked after by the Council for a certain period of time, as directed by the Council's Leaving Care team, and would have had a pathway plan drawn up.

In most cases, young people leaving care will be ready to move into independent living with the support of Children Services. If the young person is ready to move-on and has

developed the required life skills, (e.g. managing a budget, cooking, cleaning, etc.), the Council will support her/him to find suitable private rented accommodation.

However, some young people are more vulnerable than others when leaving care, and accommodation in the private rented sector would have a detrimental effect on their transition to independent living.

Such applications will be considered by a Care Leavers Panel, consisting of senior officers from Housing Services and Children Services, who will determine whether to award priority for their social housing. See Shared Council Housing – For leaving carers 3.4.3

Applications from young people with other mitigating circumstances will also be considered.

b) Move-on from specialist or supported accommodation

Residents currently placed in supported housing, including those in institutional care, who are ready for independent living will be considered for move-on accommodation to help them achieve independence.

For the purpose of this scheme, these will be people currently receiving social care services for a mental health problem; a physical disability or who have learning disabilities.

Applicants referred for move-on to independent accommodation will be considered for the full range of provision available - including private sector accommodation - to meet their housing need. Only cases with a demonstrable need for long-term settled accommodation will be prioritised for social housing.

c) Reciprocal Agreements

Other local authorities and housing associations sometimes request a rehousing arrangement on a reciprocal basis.

This arrangement would be considered where the nominated household would be 'at risk' in their current property, and the referring organisation is unable to intervene to mitigate the risk or rehouse the nominated household themselves.

Once accepted, the Council will provide assistance on the following basis:

- the Council will have nomination rights to the resulting vacancy or another property of similar type or size;
- the applicant will be placed in the Band 2b as an exceptional case and the nominated household be made one reasonable offer;
- the accommodation will be of a similar size and type to that currently occupied by the nominated household;
- the offer of accommodation will be at a safe distance to the current accommodation.

People approved under the Right to Move scheme⁵, and any other relevant schemes, will be covered within this provision.

2.4.3 Homelessness

⁵ Right to Move is a national scheme that allows Council tenants who need to relocate for a job to be prioritised for social housing in areas to which they previously did not have a personal link, placing them at the same priority on the housing list as veterans of the armed forces.

This applies to people who are homeless, or threatened with homelessness, within the meaning provided for in Part 7 of the Housing Act 1996 (as amended).

2.4.4 Overcrowding

When assessing overcrowding levels, the Council will only take into account those people who are part of an applicant's household.

If the applicant needs an extra room for medical reasons, they will be assessed to determine medical priority – see 2.4.1 above.

Where an applicant is pregnant and entitled to a larger property, priority will only be given for overcrowding from when the baby is born. Where the applicant is not the main person who cares for the children named on a housing application, the children may not be taken into account in the assessment of overcrowding.

The applicant's living room and kitchen will not be counted as bedrooms. However, if their accommodation has more than one living room, only one of the living rooms will be counted as a living room and the others will be counted as bedrooms. Bed-sit and studio accommodation will be considered to have no living room.

Please note that bedroom areas less than 4.6 sq. m (50 sq. ft.) will not be taken into account when making the assessment.

2.4.5 Households living in unsanitary conditions or unsatisfactory housing conditions

A tenant is living in unsanitary housing if their current accommodation does not have:
a bathroom or a kitchen;

- an inside toilet;
- hot or cold running water.

A tenant is living in unsatisfactory housing if their current accommodation:

- does not have electricity;
- does not have gas;
- does not have adequate heating;
- is in disrepair;
- is unfit for human habitation.

The condition of their current accommodation will be verified by a member of the Council's Environmental Health Team and must have at least one 'category 1 hazard' that is or cannot be resolved by the landlord within six months. Examples of where this would apply include accommodation that has:

- severe damp;
- a major structural defect including subsidence, flooding, collapsed roof;
- been issued with a notice of statutory nuisance by an environmental health officer;
- been declared unfit for human habitation and is due to be demolished under the Housing Act 2004.

2.4.4 Secure tenants of the Council/partners of such tenants leaving accommodation due to domestic abuse

The Council want to ensure that those experiencing domestic abuse are treated fairly and appropriately when approaching it for housing assistance. In particular, where a secure tenant or their partner applies to join the register because they have left or need to leave their current accommodation because of domestic abuse experienced by them or another member of the household with whom they are presenting then they will be given an urgent priority for housing so long as it is accepted by the Council:

- (a) that they have and/or the said household member has experienced domestic abuse. 'Domestic abuse' is used in the sense provided for at section 1 of the Domestic Abuse Act 2021⁶;
- (b) they need to leave/needed to have left the Council accommodation because of the domestic abuse;
- (c) it is not reasonable to expect them to remain at/return to the said Council accommodation, even if the abuser can be excluded from there.

2.5 The Community Contribution priority

The Council believes that people who make a community contribution should have greater priority for accommodation allocated by the Council than those who do not, and operates a Community Contribution priority scheme. This scheme gives successful applicant's increased priority for housing.

Examples of the community contribution are:

- working
- membership of the British armed forces
- volunteering

Full details are contained in appendix 1.

An applicant can apply for a Community Contribution priority at any time they apply to join the Housing Register, or at any time once they have been placed in the band 3 on the Housing Register.

It is the applicant's responsibility to apply for the reward and to provide proof to demonstrate that they meet the qualification criteria.

The Community Contribution priority will be reviewed each year and if an applicant is no longer making a community contribution then they will be moved to a lower band.

The Community Contribution priority will only be given to applicants who also meet the Housing Register qualification criteria. Verification will be sought at the point of application.

2.6 Housing bands

Havering Council's housing bands system is used to help determine how applications for housing are fairly prioritised.

It comprises five levels (bands) of priority and has been framed to help ensure that 'reasonable preference' is given to applicant households in order of their assessed housing need:

- **Band 1 – Urgent Need**

People who have an urgent need to move.

Category	Criteria Guide
Urgent medical or disability (Reasonable preference category S.166A(3)(d))	This applies to an applicant, or someone in their household: <ul style="list-style-type: none"> • who is in hospital or residential care, and who cannot return home due to the unsuitability of the property; • who has a severe mobility issue; is housebound, and is unable to leave their accommodation without assistance that will result in a high risk to the applicant, household member or their carer/s.
Hardship and Welfare Criteria (Reasonable preference category S.166A(3)(c)-(e))	This applies to an applicant, or someone in their household, whose circumstances, or a combination of circumstances, are considered to be life-threatening, and where the need to move is supported by health professionals, the Council's Housing and Social Services, a senior Police Officer and/or a MARAC ⁷ assessment.
Decants - major works or demolition (Reasonable preference category S.166A(3)(c))	This applies to secure Council tenants who are required to move because their current home is due to: <ul style="list-style-type: none"> • be sold, and/or • be demolished or • have extensive works completed, or • be refurbished (which may include conversion works), meaning that they will need to move out their current accommodation while the works are taking place. <p>Please note: that this condition does not apply private sector leased properties.</p>
Domestic Abuse (Reasonable preference category S.166A(3)(a)(d))	This applies to existing secure tenants of the Council, or spouses or civil partners of existing secure tenants (including where living together as husband and wife/civil partners), where they need to permanently leave or have had to already leave their current accommodation because they or a household member have been experiencing domestic abuse and it is unreasonable to expect them to remain at/return to the Council accommodation..

- **Band 2a**

Category	Criteria Guide
British Armed Forces/Reserve Forces personnel	This applies to: <ul style="list-style-type: none"> • A household member who is, or has been: <ul style="list-style-type: none"> - a serving (or former serving) member of the British Armed Forces/reserve forces, and who has made a Housing Register application within five years of their discharge; - a serving (or former serving) member of the regular or reserve forces, who needs to move because of a serious injury, medical condition or disability sustained as a result of their service; - a bereaved spouse/civil partner of a member of the British Armed Forces, leaving Services Family Accommodation following the death of their spouse.

⁷ MARAC - A Multi Agency Risk Assessment Conference (MARAC) is a victim-focused information sharing and risk management meeting. The role of the MARAC is to facilitate, monitor and evaluate effective information sharing to enable appropriate actions to be taken to increase public safety.

	Members of the armed forces or their spouses do not need to demonstrate a community contribution.
Working households	This community contribution priority is given to an applicant who is part of a working household in paid employment of more than 16hrs per person a week for a continuous period of 12 months
Disability	This applies to: <ul style="list-style-type: none"> • A household member who is disabled and under retiring age, and who has been assessed as eligible for the support element of the Personal Independence Payment (PIP) scheme, due to a permanent disability which prevents them from working or volunteering and therefore not able to give a community contribution.
Care Leavers	<ul style="list-style-type: none"> • The applicant has been accommodated by Havering Council's Children and Young Adults Services, and where it has been confirmed by the service that they are now ready to move on to alternative (e.g. independent or supported) accommodation. • The applicant has been assessed as having the life skills to manage a tenancy - including managing a rent account - and has the appropriate support package in place. <p>Care leavers do not need to demonstrate a community contribution.</p>

- **Band 2b**

Council tenants, with a fixed term tenancy coming to an end, referred to a new property	This applies to situations where the Council originally intended to grant a new tenancy for the current property, but has subsequently decided to grant a tenancy of an alternative property. For further information, please view the Council's Tenancy policy .
Council service tenants where there is a contractual obligation	The applicant is a Council employee who has been living in tied accommodation (i.e. provided to them as part of their work) but needs to move out due to: <ul style="list-style-type: none"> (a) retirement, or (b) redundancy, or (c) the Council is changing, or has changed, the terms of the employee's employment.
Succession rights where property is not suitable	The applicant lives in a Council property and has the right of succession following the death of the tenant, but the property is too large; has had adaptations to the property that they no longer require, and/or there is an age restriction that renders them ineligible to hold the tenancy of the property.
Release of adapted property (Reasonable preference category S.166A(3)(e))	The applicant is a Council tenant who is willing to transfer to a suitable, non-adapted property and is releasing an adapted house or designated older persons property.

Under-occupation (Reasonable preference category S.166A(3)(e))	<ul style="list-style-type: none"> The applicant is a Havering assured⁸ or secure⁹ tenant who wishes to downsize. Please note that this excludes tenants living in privately leased accommodation.
Foster carers referred by the Council's Children's Service (Reasonable preference category S166A(3)(d) or (e))	The applicant is a registered Havering Council foster carer where their current housing situation prevents them from being able to start, or continue to provide foster care or adopt.

- Band 2c**

Category	Criteria Guide
Volunteer (Reasonable Preference category s166A(3)(c) and (d))	A member of the household has been a volunteer or an unpaid worker for more than 16 hours a week and has been continuously for the last 6 months.
Carer (Reasonable Preference category s166A(3)(c) and (d))	The applicant gives care to a Havering resident that is substantial and ongoing.
(b) Move on from specialist accommodation (Reasonable Preference category s166A(3)(c))	<ul style="list-style-type: none"> The applicant is moving on from specialist accommodation provided by either; Havering Council's Social Services Team, North East London Foundation Trust (NELFT,) or another registered supported housing provider in line with an agreement with Havering Council's Housing Service. The applicant has been nominated as part of an agreement with a single homeless accommodation provider in Havering, where they are in need of settled accommodation and unable to secure it. The applicant has been assessed as having the life skills to manage a tenancy, including managing a rent account and the necessary support package in place.
Homeless households owed a full homeless duty under section 193(2) or 195(2). (Reasonable Preference categories s166A(3)(a)(b))	<ul style="list-style-type: none"> Where it is in the overriding interest of the Council to prioritise an allocated place, in order to make best use of Havering's resources. Where the landlord wants the temporary accommodation property back and where; a) the tenant has been in temporary accommodation for 7 years, b) the Council has been unable to find alternative suitable temporary accommodation (i.e. end of lease agreement).
Unsanitary conditions where the conditions pose an ongoing and	The applicant is the owner-occupier/private tenant and the Council's Environmental Health Team has determined that:

⁸ An assured tenancy is for a fixed period , for example; one year

⁹ A secure tenancy is for a lifetime period.

<p>serious threat to health (Reasonable preference category S.166A(3)(c))</p>	<ul style="list-style-type: none"> the property poses a category 1 hazard under the Housing Health and Safety Rating System (e.g. crowding and space, excessive cold or risk of falls) and the Council is satisfied that the problem cannot be resolved by the landlord within six months, and as a result, continuing to occupy the accommodation will pose a considerable risk to the health of the household (this would include properties that have severe damp and major structural defects such as subsidence, flooding, collapse of roof) or the household is living conditions which are represent a statutory nuisance, and there is no prospect of the problems being remedied within a 6 month time period, or that; as an owner-occupier/private tenant, the applicant has been issued with statutory notice by the Environmental Health Team, stating it is an unfit property to be demolished under the Housing Act 2004.
<p>Reciprocal arrangement</p>	<p>The Council will only agree to reciprocal requests from other authorities and Registered Providers where they can demonstrate that there is imminent personal risk to the tenant or their family, and the accommodation is required in Havering, and that the reciprocal property being offered will be beneficial to Havering residents with high priority to move.</p>

- Band 3**

People who have a need to move but do not qualify for Community contribution priority.

Category	Criteria Guide
<p>Homeless households owed a full homeless duty under section 193(2) or 195(2). (Reasonable Preference categories s166A(3)(a)(b))</p>	<p>The Council has accepted a duty to accommodate within the meaning of the Housing Act 1996, Part 7.</p>
<p>Homeless Households (Reasonable Preference category s166A(3)(a))</p>	<p>People who are homeless or threatened with homelessness (within the meaning of Part 7, as amended by the Homelessness Reduction Act 2017).</p>
<p>Overcrowding (Reasonable Preference category s166A(3)(c))</p>	<p>The applicant is living in a property that has one or more bedrooms less than required under the Havering Council housing bedroom standard.</p>
<p>Applicants living in unsatisfactory</p>	<ul style="list-style-type: none"> The applicant is living in a property without access to one or more of the following facilities:- <ul style="list-style-type: none"> a bathroom or kitchen;

<p>housing lacking basic facilities (Reasonable Preference category s166A(3)(c))</p>	<ul style="list-style-type: none"> - an inside WC, or - hot or cold water supplies, electricity, gas or adequate heating <ul style="list-style-type: none"> • The applicant lives in private property which is in disrepair and is unfit for occupation. <p>Please note that:</p> <ul style="list-style-type: none"> • Applicants who only have access to shared facilities do not qualify under these criteria. • The above applies to private tenants living in a property that has a Category 1 risk as defined by the HHSRS.
<p>Moderate medical grounds (Reasonable Preference category s166A(3)(d))</p>	<ul style="list-style-type: none"> • The applicant's housing is unsuitable for severe medical reasons or due to their disability, but they are not housebound or their life is not at risk due to their current housing. However, the housing conditions directly contribute to causing serious ill-health.
<p>Need to move for care or support (Reasonable Preference category s166A(3) (c) and (d))</p>	<ul style="list-style-type: none"> • The applicant needs to move to receive care that is substantial and ongoing; • The applicant needs to move in order to access Social Services facilities, and is unable to travel across the Borough; • The applicant wishes to move to a certain locality, where not doing so would cause hardship (which includes those approved under Right to Move Scheme).
<p>Housing for older people (Reasonable Preference category s166A(3)(d))</p>	<ul style="list-style-type: none"> • Older, or disabled residents, seeking sheltered or extra care housing who are unable to meet their housing needs from their own resources (i.e. asset rich but cash poor), but agree to lease their property to the Council to use as temporary accommodation.

2.7 Applying to join the Housing Register

Before applying to join the Housing Register, applicants are asked to check that they are suitably eligible, qualified and in housing need.

Applications to join the Housing Register are made by completing an online self-assessment form on the Council's website.

Havering Council's Housing Register team (telephone 01708 434343) will help any applicants requiring assistance with completing the online self-assessment. Those wishing to apply but are unable to access the internet at home can get free access at all Council libraries.

2.8 The Effective Date

The 'effective date' is the date that the applicant joined the Housing Register once they are approved.

If the application to join the Housing Register is re-assessed and the applicant achieves the Community Contribution priority, they will be given a new effective date, which is the

date they applied to be re-assessed. The new date will continue to apply if the applicant successfully re-applies for a higher Community Contribution priority.

If an applicant successfully applies for Band 2a from Band 2c, then their effective date will change to the date of this new banding. This also applies to applicants who successfully apply from other lower priority to higher priority bands.

If the application is re-assessed and the applicant qualifies for Band 3 only, the effective date will revert back to the original date when their Housing Register application was approved.

3. Finding a home

3.1 Tenancy types

Most applicants will be offered a fixed-term, tenancy. These allow the landlords to review the tenant's needs and situation with regularly.

The Council will normally only offer joint tenancies to applicants (including existing tenants) who have satisfied the Council of their intention to live together on a long-term basis. A joint tenancy will not be offered where an ineligible person is one of the joint tenants.

Applications for a joint tenancy will not be considered in cases where:

- there is a current Notice of Seeking Possession or Notice to Quit against a proposed joint tenant;
- the Council is contemplating serving or reserving a Notice of Seeking Possession or Notice to Quit upon the proposed joint tenant;
- there are management problems such as nuisance or anti-social behaviour on the part of the tenant or someone living with or visiting them;
- the proposed joint tenant is not maintaining an acceptable agreement in respect of rent arrears;
- One tenant was made homeless intentionally.

3.2 Housing options

Social housing is a scarce resource and while applicants may wish to consider other housing options, available both in and out of borough, to inform their choice. To enable this to happen the Council operates a Housing Opportunities Register, on which a member of the public can record their preference for housing options other than social housing. Applicants who are found not to qualify for the Housing Register will be referred to the Housing Opportunities Register. Examples for the options available are considered below.

3.2.1 Mutual Exchange

The waiting time for a social tenancy in Havering can be lengthy, so many existing tenants seeking a new property decide to opt for a mutual exchange.

A mutual exchange is when two or more tenants swap their homes; a process that requires the prior permission of the social landlord (i.e. usually councils or housing associations). Havering Council tenants can register for a mutual exchange.

The Council will only say no to a request for a mutual exchange for a limited number of reasons, as defined by law¹⁰. For example, a tenant may not be able to swap tenancies

¹⁰ the Housing Act 1985 and the Housing Act 2004

straight away if, for example, they owe rent or there are repairs needed to the property that the tenant has to carry out. However, once these matters have been sorted out, the tenant should be able to move.

A full list of reasons for not giving consent for a mutual exchange is available from the Housing Choice and Applications team. If the Council refuses a mutual exchange request, the applicant will be informed, in writing, of the reasons.

The applicant has the right to appeal the decision directly with the Council. If the applicant is disagrees with the appeal outcome, they have a further right to refer the decision to the County Court.

3.2.2 London Living Rent

London Living Rent homes are for middle-income households who now rent and want to build up savings to buy a home. This can be either through shared ownership or outright purchase. Landlords are expected to encourage their tenants into home ownership within 10 years.

The homes will be offered on tenancies of a minimum of three years. Tenants will be supported to save and given the option to buy their home on a shared ownership basis during their tenancy. They will also be given extra priority for other shared ownership homes across London. To be eligible for a London Living Rent home, you must:

- be renting in London
- have a maximum household income of £60,000
- be unable to currently buy a home (including through shared ownership) in your local area.

3.2.3 Intermediate Renting

Intermediate Rent homes are provided by housing associations offering the opportunity to rent a home at a rent that is 20% less than the market rate. The rent charged is up to 20% less than you would expect to pay for a home in a similar area if it were renting from a private landlord.

There are a range of different types of intermediate rental homes including studios, one, two and three bedroom flats and shared apartments.

3.2.4 Shared Ownership: Low-cost home ownership

Shared Ownership is where a person can buy a share of a property, paying a mortgage on that share and rent on the remaining share (a part-own/ part-rent arrangement).

If someone is on a low income, shared ownership can give them a chance to own their own home in stages. The minimum share purchase is 25% and the maximum 75%.

When their income increases, they can buy further shares in the property until they own 100% of it. For more information about Shared Ownership schemes that are currently available, please contact the Council's Home Ownership team.

Applicants who do not qualify for social housing due to coming above the required income threshold will be new Housing Opportunities Register.

3.2.5 Housing Moves & HomefinderUK

The Housing Moves scheme enables tenants of London boroughs or housing associations to move to a home in another borough, for work reasons, training or education, to free up larger homes or to care for a family member or friend.

The Council's Housing Register qualification rules do not allow someone to go on the housing waiting list if they have not lived in Havering for at least six years. However, an exception is made for applicants who apply through Housing Moves.

The HomefinderUK National Mobility Scheme enables households on the Havering Housing Register to access social housing in other parts of the UK.

3.2.6 Tenant Incentive Scheme

The tenant incentive scheme allows a secure tenant to apply for a grant to purchase a home on the open market. The Council have in its gift to offer a grant which will amount to the value of the deposit to obtain a mortgage up to a maximum value.

3.2.7 Downsizing Incentive scheme

The Council has a 'Downsizing Incentive Scheme' to enable council tenants to move to smaller accommodation that meets their needs, and offers a cash incentive based on the level of room reduction and the associated costs to move in the event of financial hardship. It is designed to help meet the increasing demand from people living in overcrowded conditions who are on the housing register. The scheme however, is subject to change from time to time.

3.3 Bedroom size entitlements

Havering Council is committed to making the best and most effective use of its limited social housing stock by making sure those properties are not being under-occupied. Consequently, the size and type of property an applicant is allocated will depend on the size of their household.

The housing size standards operated by the Council are:

- A single parent will be treated as a couple.
- people aged 16 years or older not living as a couple should not have to share a bedroom
- people of opposite sex where one or both is over the age of 10 should not have to share a bedroom unless they are both over 16 and living as a couple
- no more than two people should have to share a bedroom
- a confirmed pregnancy over 24 weeks supported by details of the expected date of delivery counts as a child.

In exceptional cases, an extra bedroom may be agreed on medical or welfare grounds where the nature of a condition suffered by a household member makes it essential to have a separate bedroom.

Applicants may bid for properties that are a bed size smaller than their housing requirements. This decision is at the discretion of the Choice and Allocations Manager.

Where there is shared care of children

For the purpose of this scheme, a child can be a son or daughter of any age.

Where an applicant has shared care of one or more children, and that care is for less than 50% of the week, the child/children will not be included in the assessment for bedroom entitlement.

Where an applicant has shared care of one or more children, and that care is for at least 50% of the week, the Council will further assess whether or not the child/children will be included in the assessment for bedroom entitlement.

The starting point will be to determine whether or not the child is already adequately accommodated¹¹. If it is established that the child/children are not already adequately housed, the child/children can be counted as part of the bedroom entitlement.

In all cases, applicants will need to provide evidence of the shared care of any child/children which will include:

- A copy of the child's birth certificate, and
- Evidence of parental responsibility for the child/children and;
Proof of a Court Order or written agreement by the sharing parent to evidence shared care and any benefits received for the children e.g. Child Benefit or Child Tax Credits. It is expected that parents with shared care will also share any State Benefit provided for the child.

3.4 Specialist Accommodation

3.4.1 Adapted properties

The Council has a small number of properties that have been specifically adapted for disabled people. These properties are in short supply, so it is essential they are allocated to people who really need them.

Adapted properties, and those suitable for adaptation, for applicants with a substantial disability may be advertised or offered directly to the most eligible applicant. If there are several applicants for whom the property would be suitable, allocation will be decided in band, and then date, order.

Council tenants who are currently living in adapted accommodation but no longer need it are encouraged to move to suitable non-adapted accommodation. These applications will be placed in Band 2a.

3.4.2 Housing for older people

The Council offers two types of supported housing schemes¹² for older people – Sheltered Accommodation and Extra Care Accommodation – the main difference being in the facilities and level of support provided.

- **Sheltered Accommodation**

Sheltered Accommodation is offered to people who require a medium or high level of support due to frailty, ill-health or restricted mobility. Communal facilities include a lounge

¹¹ "Adequately accommodating" means that the child either has his/her own bedroom or is sharing appropriately in line with the Bedroom Standard.

¹² Supported housing is a housing scheme offering housing, support and sometimes care services in a single, complete package.

and laundry facilities, and a dedicated scheme manager provides residents with advice and support.

In order to be eligible for supported accommodation, applicants must meet all of the following criteria:

- 55 years old or over
- Single or joint applicants with no dependants
- In need of the housing support provided by the scheme

In addition, applications may be considered from owner-occupiers aged over 60 and who have been assessed as being unable to meet their housing needs from their own resources.

The Council can assist these people by offering supported accommodation on the basis that the owner agrees to lease their property to the Council to be used as temporary accommodation. In this case, applicants will be visited and assessed to ensure that they can live independently (with a care package, if required).

If the applicant's accommodation and support needs are considered too high for sheltered accommodation, the application will be referred for consideration for Extra Care housing.

- **Transferring within a Sheltered Housing scheme**

Where an applicant lives in Council owned sheltered accommodation, on the first or higher floor without a lift, priority can be awarded to facilitate a move to the ground floor due to medical needs.

The decision to award the priority is made by the Housing Choice and Applications manager. Applicants should identify why they need to move to a lower level – this will typically be as a result of deteriorating health and mobility issues. Where an urgent move is necessary, a medical assessment will be carried out in line with the criteria for Medical Priority.

- **Extra Care housing**

Extra Care housing is for people who require a substantial amount of personal care and housing support, and who might otherwise have to move into residential care.

Applications for Extra Care housing can be made direct to the Council's Social Care or Housing teams.

Please note that Extra Care housing is allocated outside of the Council's Choice Based lettings process and that a separate eligibility criteria and process applies.

3.4.3 Shared Council Housing – For leaving carers

Young people leaving care are an identified group at risk of failing to sustain their tenancy.

The scheme will enable this group to share two-bedroom accommodation as part of their tenancy and skills development programme.

In the event there is a failure of tenancy this group will be referred back to supported accommodation for further development of their independent living skills.

3.5 Special circumstances

3.5.1 Decants

Decants occur when the Council has decided that a transfer to alternative accommodation offers the best way of ensuring that development, modernisation, conversion or essential repair works go ahead without causing huge disruption or hardship to the tenants. Decants can be on a temporary or permanent basis.

The Council will consider the likely impact of the planned repairs and improvements, and whether they will be so disruptive that it would be unreasonable to expect the tenant to remain in the property while the works are carried out.

Additionally, the Council will consider whether or not, for technical or safety reasons, it is feasible for the tenant to remain in their home while the works are carried out around them.

For the tenant to be awarded decant priority, equivalent in priority need to the band 1, the Council must be satisfied that the work will be so disruptive that it cannot be completed with the tenants remaining in occupation and either:

- The work is likely to take more than three months to complete; or
- The health of the tenant or a member of their household will be severely affected if they have to leave their home and then move back again at a later date

Permanent decants

This will take place if the work is likely to take more than three months to complete and/or it would not be reasonable for the tenant to have to leave their home and then move back again at a later date.

The tenant may be awarded priority for a transfer to suitable alternative accommodation. If a tenant does not want to be permanently decanted to alternative accommodation, they will have the right to return to their existing home.

Tenants that need to be decanted from their homes on a permanent basis as a result of redevelopment or regeneration will be moved in a planned way.

Each redevelopment/ regeneration scheme will be subject to consultation, equalities impact assessment and approval by Cabinet. When decant status has been authorised, tenants will be placed Band 1 on a phased basis so they may bid for an alternative home.

If they fail to successfully bid for a property a direct offer of accommodation will only be considered in exceptional circumstances and if none exist the Council may decide to take possession proceedings. Existing secure tenants whose homes are due to be demolished will have priority for the new replacement homes being provided on their estate in accordance with the provisions agreed for each estate, before they are made available to any other applicants.

Further details about this are available in the Council's Regeneration - Local Lettings plan. Please note: This does not apply to applicants living in temporary accommodation.

3.5.2 Property under-occupation

While council tenants have the right to continue to live in a property even if it is too large for them, the Council encourages them to move to a more-suitably sized property, to make larger homes available to younger families who need somewhere to bring up their children.

Older under-occupiers are also encouraged to move to a property more suited to their needs and more cost effective to run. Applications from Council or housing association

tenants who are under-occupying by one or more bedrooms and are willing to move to a property with fewer bedrooms will be accepted and will be placed in Band 2a.

3.5.3 Tenants in service

Employees of Havering Council who have a service tenancy associated with their employment may be re-housed in the following circumstances where the council has a contractual obligation to do so:

- Upon retirement
- Upon redundancy or where the council is changing the terms of their employment
- If the property is due to be sold and/or demolished, or have extensive works completed, necessitating a decant.

3.5.4 Succession rights

Where a person lives in a Havering Council property and has the right of succession following the death of the tenant, but the property is:

- So large that they would be under-occupying
- Has adaptations that they do not require; and/or
- There is an age restriction that renders them ineligible to hold the tenancy of the property.

If an 'under-age' spouse living in sheltered accommodation succeeds the tenancy on the death of the tenant, they must agree to move to non-sheltered accommodation. In exceptional circumstances, and at least where one other statutory agency agrees, the Director of Housing Services may decide that there are good reasons to grant a tenancy of the property currently occupied.

3.5.5 Exceptional circumstances

If an applicant has an exceptional need that is not covered by this scheme, the Director of Housing has the authority to make a decision based on the merits of the case.

3.6 Local Lettings Plans and Sensitive Lettings

Sometimes, a Local Lettings plan (LLP) will be developed by the Council or the housing provider (e.g. the housing association) which, upon mutual agreement, will be put in place for a specific area or estate on new developments.

The aim is to work towards creating more balanced local communities, by taking into account local considerations such as household types; child density or the proportion of households in employment. In all cases, the approach will reflect any particular communal issues or problems that may present within the area/estate.

In order to implement the scheme, it may be necessary to offer the social housing to applicants who are in a housing need band that is lower than we would usually offer to.

The Council may also make targeted offers to suitable applicants in particular circumstances. The offer will be made to those with the earliest priority date in the highest band that meets the criteria within the local lettings scheme.

The enforcement of a Local Lettings plan will adhere to the following principles:

- They will be developed to meet the specific needs of a local area;
- There will be a clear evidence based need for the plan;

- There will be developed and approved with an agreed procedure that must have specific aims that may be reviewed periodically;
- Equality Impact Assessment must be done;
- Local Lettings plans must be consulted on

The decision to implement a Local Lettings plan is approved by the Director of Housing, in consultation with the Lead Cabinet Member for Housing.

For homes in the borough owned by a registered social landlord where the Council has nomination rights, approval is made between the Director of Housing and a senior manager from the registered social landlord.

3.6.1 Sensitive lettings

Sensitive lettings allocate tenancies to contribute to sustaining communities where concentrations of anti-social behaviour are disproportionately high.

Sensitive lettings requests will only be accepted where it can be demonstrated that:

- The neighbouring tenants have experienced either harassment, noise nuisance or un-tenant like behaviour over a period of time or of an excessive nature, and
- Incidents have been recorded, and
- Action has been taken by the landlord or there is a public protection issue that must be managed.

3.7 Choice-based lettings

Havering Council aims to maximise the choice of accommodation offered to those wishing to rent a social or affordable home in Havering by operating a Choice-based lettings (CBL) system.

A CBL scheme gives people the chance to choose which Council house or housing association accommodation they want and makes the complex decision of which property to choose one for the applicant. It works on a bidding principle, as and when properties become available.

The Council's CBL scheme is called Choice Homes, and anyone placed on the Housing Register can bid for a home they want to live in. The bidding system does not involve any payment for a property – it is merely an indication of the applicant's preference in a particular property.

When a property becomes vacant, the Council will first check whether the property is particularly suited to an applicant with special requirements; for example, a household that urgently requires an adapted property for disabled people; where there is a recommendation from the police, social services or other professional agency for a specific type of accommodation to meet an individual need, or where a vulnerable applicant is unable to participate in the bidding system. If so, the property will be offered directly to the applicant without advertising it.

3.7.1 - Advertising available homes

Available properties that have not been directly offered are advertised on the [Choice Homes](#) website, although the means of advertising properties may change from time-to-time.

The available property will be described (sometimes called 'labelled') in a way that provides as much relevant information as possible, including:

- the size and type of property
- the floor level of the property
- the type of heating
- the rent and/or service charge
- any special facilities or adaptations
- whether pets are allowed, or not

Applicants are strongly advised to study the description carefully, as some properties may be restricted to particular groups. When an applicant sees a property that they are interested in, they are strongly recommend to visit the road, neighbourhood and consider local schools, shops, parks and other amenities before placing their bid.

3.7.2 The bidding process

Applicants must meet the labelling criteria and place their bid by the publicised deadline. Applicants will generally be able to make expressions of interest each weekly advertising cycle, and bid for up to two properties per cycle.

Applicants who require assistance with using the scheme will be able place a bid for a property by telephone or by the smartphone app. Additionally, they can bid by means of the Choice Home website, or by mobile phone text messaging.

Bids are prioritised by band; from Band 1 to Band 3, with applicants having the longest waiting time coming first in the band. The applicant can withdraw their bid at any time during the bidding cycle.

3.7.3 Auto-Bids

For those unable to bid due to support needs, the Council offers an auto-bidding system that will automatically place bids for all appropriately-sized properties requested by the applicant.

The applicant specifies the area and type of property they are interested in and housing officers can set up the bidding system to automatically place bids on up to two properties matching their description every week. The system will also tell the applicant how many other people with a higher priority have bid for the same property.

3.7.3 Monitoring bidding activity

The Council monitors online bidding activity.

If an applicant does not bid for suitable properties that have been advertised for six months from the date they are accepted on the Housing Register, they will be contacted to find out the reason/s why.

They will also be advised that their place on the Housing Register could be suspended for a period of six months. The applicant will be notified when this decision is made.

In making the decision, the Council will take into account if there have been no suitable properties advertised or whether there are special circumstances for the applicant not bidding.

1. How housing applications are processed

4.1 – How bids are shortlisted

When the advert deadline has passed, a shortlist of eligible applicants will be produced firstly by Banding order and then by Effective Date order - with the oldest effective date given top priority.

4.2 – Viewing a property

Following production of the shortlist, arrangements will be made by the relevant landlord (i.e. Havering Council or a Housing Association/Registered Provider) for the shortlisted applicants to view the property as soon as possible.

The invitation to view a property is made via a telephone call and/or an SMS text message. This is immediately followed up by an email or letter confirming the viewing.

4.3 - How housing offers are decided

The Council operates a Priority Viewing system, which means that a shortlisted, priority applicant will be invited to view the property.

At the time of being contacted by phone and/or SMS text message, the Council will ask the applicant to confirm within 24 hours that they will attend the viewing. Failure to confirm attendance will be taken as withdrawing the bid and the next shortlisted applicant will be invited to view the property.

In instances the property has proven difficult to let, the Council may carry out multiple viewings, whereby a set number of bidders will be invited to view the property at the same time. The top priority applicant will be asked to view the property and if they do not accept then the next applicant will be offered the property, and so on.

Viewings are conducted in adherence to Council's Health and Safety guidelines and usually requires only the named applicant to attend the viewing. During the viewing, an applicant will be given further information about the property, the repairs to be carried out, the date when the property is expected to be available and any special conditions of tenancy.

Applicants must advise the landlord before leaving the viewing whether they would accept the property. If the applicant does not give their decision within 24 hours of the viewing, or does not attend, it will be will take that they are no longer interested in the property, in which case the next shortlisted applicant will be invited to view the property.

Once the applicant has indicated that they will be willing to accept the property a formal, written offer will be made.

Failure to bid or serial viewings

Applicants that on the housing register who have a reasonable chance of being successful in bidding for a properties, who do not bid for a period of 6 months will be contacted and advised on the process of bidding and offered any support required. If they then fail to bid for another six months then they may be suspended from the register.

Applicants who are successful in coming top of a shortlist and viewing properties for successive properties, and either do not accept the property or fail to attend the viewing, will be contacted and offered advice and support in looking for suitable properties.

The Council reserves the right to remove them from future shortlists if it is believed they may not accept the property or attend the viewing.

4.4 Tenants moving to a new property

Transferring tenants will be expected to give notice on their current tenancy. Council tenants will be required to pass a transfer inspection of their existing property before any new tenancy agreement is signed. Failure to pass the inspection will result in the offer being withdrawn.

Registered Provider tenants may also need to undergo an inspection and should advise their housing officer as soon as the offer has been made.

4.5 Feedback on let properties

The Council considers feedback on let properties as important, because it helps applicants to assess their housing prospects and make informed choices about their future housing. The Council will publish feedback on each property that has been let through its Choice Homes choice-based lettings scheme on a monthly basis, giving:

- The size, type and location of the property
- The number of applicants who bid for the property
- The band and effective date of the successful bidder.

Additionally, the feedback will include information on any 'direct lets'- let properties that were not advertised through Choice Homes.

4.6 Withdrawing an offer of accommodation

The Council will withdraw its offer of accommodation if it is discovered that the applicant:

- Or others on their housing application are, or have been, guilty of unacceptable behaviour, and it is of a type and severity that would have entitled the Council to have obtained a possession order had we been the landlord.
- Has breached a tenancy with the Council or another landlord owing through fraudulent behaviour or causing serious damage to property.
- Has previously gained a tenancy, or attempted to do so, by means of:
 - a. knowingly or recklessly has given false information in respect of any matter relating to their application
 - b. has withheld information or failed to notify the Council of any changes in their circumstances may affect their eligibility, qualification and/or priority for housing. This could lead to their possible removal from the Housing Register.

Offer withdrawal may also take place if

- The property details available at the time that the written offer was made were found to be incorrect and it was subsequently discovered that the size and type of the property did not, in fact, match the applicant's needs, and/or
- The relevant housing officer decides that, taking all factors into account, the property should not have been offered to the applicant.

4.7 Refusing an offer of accommodation

If an applicant refuses a formal offer, they will be asked to complete a form setting out their reason/s.

Their reasons will be duly considered and if it is decided the offer was unreasonable, the applicant will be allowed to remain on the Council's Housing Register and continue to bid for properties.

If, on the other hand, it is decided that the offer was reasonable then, depending on the applicant's circumstances, we will write to the applicant to:

- explain the reason/s why their refusal was decided to be unreasonable
- confirm that:
 - c. their application will be cancelled and that they will be disqualified from re-applying for housing for 12 months, **or**
 - d. the Council's duty to provide accommodation in relation to the applicant has been discharged.

Applicants must think carefully about whether to accept or refuse an offer as this could have a significant impact on whether, and/or when we will make an applicant another offer.

The property will not usually be held vacant while the reasons for the refusal are considered. It will normally be offered and let to another applicant unless the offer is to an applicant that the Council is ending its rehousing duty to; for example, a homeless household, management transfer tenant etc.

In such cases, the offer may be held for a short period, (usually no longer than 48 hours), while the reasons for the refusal is considered. The applicant will be advised of the possible consequences and given a chance to reconsider their decision to refuse the offer.

Please note that an applicant can ask for a suitability review of the accommodation offered, regardless of whether they accept the offer or not.

5. Appeal procedure

Applicants have the right to information about certain decisions, which are taken in respect of their application, and the right to review those decisions.

5.1 – Stages of appeal

Stage 1 - Notification of the decision

An applicant will be notified of the decision in writing by the Housing Choice & Applications Officer.

The notification will give clear grounds for the decision and must be based on the relevant facts of the case. It will advise that the applicant has 21 days from the date of refusal to appeal the decision.

Where a notification is sent to an applicant at the given contact address, but the applicant does not receive it, it can be treated as having been received if a copy of the notification is available on the applicant's file.

Where an applicant has difficulty in understanding the implications of a decision, the Council will make arrangements to advise the applicant verbally.

Applicants can request representations on an appeal decision via a named representative. The Council will acknowledge this representation so long as it is authorised with the applicant's written consent.

Stage 2 - 21 Days to Appeal

Applicants who wish to appeal for a review of a decision should, in the first instance, contact the housing officer who has dealt with their case, giving their reasons why they think that the decision is unreasonable.

The applicant will be notified, usually within 48 hours from the date of refusal, whether the decision still stands and provided with supporting information.

If the applicant then wishes to request a review of the decision, it should be made in writing within 21 days, either by email to: housingapplicationappeal@havering.gov.uk or by post to:

The Reviews & Appeals Officer
Housing Demand Service
Havering Council
Mercury House
Mercury Gardens
Romford, RM1 3DT

Where an applicant is unable to request a review in writing, they can ask someone else to do this on their behalf, or ask us to hear their case orally. It will also be possible for their nominated representative to submit an appeal on behalf of the applicant.

Stage 3 – The review

An officer who is senior to the original decision maker will carry out the review of the decision.

The review will be considered based on the processes set out in this scheme, legal requirements and all relevant information relating to the application, including any further relevant information was not available at the time of the original decision.

Stage 4 - Notification of the outcome

The applicant will be notified about the outcome of the review within 56 days from the date the appeal was received. The notification will also detail the reasons why the original decision has been changed or upheld.

There is no further mechanism to review the decision, however, the applicant can take legal action to challenge the Council's decision through judicial review proceedings.

The applicant may also complain to the Housing Ombudsman if they consider the Council's actions amount to maladministration.

Please note that the onus to explain any change of circumstances will remain with the applicant throughout.

5.2 Appeal procedure for the statutory homeless

If the Council has accepted a full statutory duty to house an applicant under the Housing Act 1996 Part VII as amended by the Homelessness Reduction Act 2017, and they have refused a suitable property offered to them (including an offer of private rented accommodation), the Council will end its statutory duty.

The applicant can request a review of the decision to end the statutory duty and/or the Council's decision that the property is suitable. The request should be made, in writing, to the Council within 21 days from the date the offer of accommodation was made to the applicant and should set out the reason/s why they think the property is unsuitable.

The review appeal will be considered by a senior officer who was not involved with the original decision, and will aim to reply, in writing, to the applicant within 56 days (eight weeks) from the date the request was received.

If an applicant is dissatisfied with the Council's decision on review, or no decision has been made within the 56 days (unless there has been an agreed extension), the applicant may appeal to the County Court. Appeals to the County Court, including the procedure and time limits are technical matters, and the applicant may wish to seek independent legal advice (e.g. from the Citizens Advice Bureau or from a solicitor) before doing so.

5.3 Comments and complaints

Havering Council is committed to responding quickly, thoroughly and effectively to any comments or complaints it receives, and to use this information to help further improve the service it provides to local residents.

We welcome complimentary feedback when we get it right, and any service improvement suggestions you may wish to offer. Like most large organisations, occasionally we don't get things quite right and you may decide to raise a complaint about the service you have received.

In the first instance, please would you raise the matter with the officer that you have been dealing with, and, if the matter is not satisfactorily resolved, escalate the matter to their supervisor. Often, this is the quickest and easiest way of dealing with such matters.

However, if you feel uncomfortable doing this, or remain dissatisfied with the way the matter has been handled, we have a formal complaint procedure that can be used, which is detailed on our website at www.havering.gov.uk/complaints.

We constantly endeavour to deliver the best possible standards of service to our residents and treat complaints very seriously. We will aim to reply to any complaint with 10 working days from the date of receipt.

6. Implementation of this scheme

This scheme will take immediate effect from XX XXX 2021.

6.1 Monitoring and review of this scheme

In the interests of continuous improvement, this scheme will be reviewed annually to ensure it remains relevant, up-to-date and fit-for-purpose for Council and the residents of Havering.

For further information about the details of this scheme or assistance, please contact the Housing Choice and Applications manager at Havering Council by email at housingneeds@havering.gov.uk.

6.2 Delegated authority to make minor changes to this scheme

To ensure that this scheme operates fairly and legally, the Director of Housing in consultation with the Lead Cabinet Member of Housing will be able to approve minor

amendments to the scheme. These are amendments that do not significantly change this scheme or associated procedures.

Housing Allocation scheme

APPENDIX 1 – Community Contribution reward: Qualification Criteria

Community Contribution Reward - scheme 1

	Definition	Supporting evidence required
Working households	<p>The sole or one of the joint applicants:</p> <ul style="list-style-type: none"> • Works at least 16 hours per week for 6 out of the last 12 months • For those aged 70+ years, works at least 5 hours per week for 6 out of the last 12 months. • Has a permanent contract, temporary contract, or • Is self-employed and can demonstrate that they have been for at least 12 months. <p>Breaks in employment Where an applicant loses employment they will no longer qualify for the Reward. However, we recognise that in the current economic climate, people can lose their job from time-to-time. If further employment is gained within the next 6 months, the application can be reinstated with no loss of accrued waiting time</p> <p>Pregnancy and maternity/paternity leave</p> <ul style="list-style-type: none"> • Applicants who are on maternity leave or paternity leave but remain in employment can also qualify for this award. 	<p>Original contract of employment, payslips, P60, bank statements or a verifying letter on headed paper, or can prove that you are registered at Company House in order to qualify.</p> <p>If the applicant is self-employed, we will need to see a minimum of 12 months continuous documented tax returns containing reference to the self-employed activity.</p> <p>In the case of pregnancy and maternity, we will need written evidence of statutory maternity pay.</p>
Ex-services personnel	<p>The sole or one of the joint applicants:</p> <ul style="list-style-type: none"> • who have served in the British Armed Forces at any time in the five years prior to making an application, or • are close to leaving at present, and • was not dishonourably discharged. <p>This includes people who have served in the Royal Navy, Royal Air Force and British Army.</p>	<p>Original Certificate of Cessation of Entitlement to Occupy Service Living Accommodation will need to be provided.</p> <p>Service with the armed forces will be confirmed with the Royal British Legion.</p>
Fostering or adopting	<p>Applicants living in Havering who would like to foster or adopt a child (and/or more children),</p>	<p>A letter from Havering Council's Children and Young Adult Service</p>

	<p>but are unable to as they currently live in an inappropriate property.</p> <p>The property must be considered inappropriate either due to the property size or the tenure type.</p> <p>The applicant must have the support of Havering Council's Children and Young Adult Service and they must confirm that your current home is barring you from adopting or fostering a child (and or more children).</p>	<p>stating that the applicant(s) will be accepted as a foster carer(s) or adoptive parent(s) and will only be able to adopt or foster a child (and or children) if they move to another property.</p>
Disabled households	<p>A disabled applicant under retiring age who has been assessed as eligible for the support element of Employment and Support Allowance due to a permanent disability which prevents them from participating in work related activities.</p>	<p>A letter from Department of Work and Pensions confirming receipt of Employment and Support Allowance.</p>
Volunteering	<p>The sole applicant or one of the joint applicants volunteers for:</p> <ul style="list-style-type: none"> • a minimum of 16 hours a week • those aged 70+ years, for a minimum of 5 hours a week • Not for profit organisations or groups, including a charity, or community or faith group recognised by Havering Council's Active Living programme, or <ul style="list-style-type: none"> - registered as a charity with a premises in Havering, or - registered with Havering Volunteer Centre (Havco) • a continuous period of at least 6 months up to the point of application and continuously until the point of offer. • Within the London Borough of Havering. 	<p>An original letter on the organisations headed paper from the manager responsible for volunteers confirming the applicant's involvement in the minimum hours per month of voluntary work for the past 12 months.</p> <p>This person must not be related to the applicant in any way.</p>
Carers	<p>An applicant who is:</p> <ul style="list-style-type: none"> • Providing full time care (minimum of 35 hours per week) to an elderly person or disabled child and • Is in receipt of full carers' allowance • Where carers' allowance is not payable because of the carer's age or other benefit restriction, evidence will be required to prove the applicant's status 	<p>Confirmation of receipt of carers' allowance or other evidence from a statutory agency or relevant medical practitioners.</p>
Downsizing	<ul style="list-style-type: none"> • The applicant is a Havering social housing tenant holding a secure, assured or fixed term tenancy who wishes to move to a property with 	<p>A reference from the landlord (either the Council or a housing association) confirming that the applicant is living in a</p>

	<p>fewer bedrooms and is not impacted by housing benefit/bedroom tax. NOTE: this does not apply to Private Sector Leased (PSL) tenants, or</p> <ul style="list-style-type: none"> • The applicant is a housing association tenant not living in Havering who wishes to move to a property with fewer bedrooms and Havering Council can nominate someone to their current property if they move. <p>If the applicant want to downsize you must move to a property with fewer bedrooms.</p>	<p>property that is too large for their needs. If you are a housing association tenant not living in Havering, we must have the association's agreement that we can nominate to your property if you move.</p>
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Housing Allocation scheme

APPENDIX 2 – Adapted Housing – mobility categories

Vacancies which are adapted or which are suitable for adaptation for applicants with a substantial disability may be advertised or offered directly to the most appropriate applicant. The Council reserves the right to allocate to a high priority applicant in need of such accommodation.

The categories used are in line with the categories described by the London Accessible Housing Register (LAHR). The LAHR has been developed to help make better use of accessible homes and to enhance the choice of homes for people with mobility needs.

Mobility Categories - Assessment of Mobility Need

A household’s mobility needs will be assessed based on three categories (A, B & C) of mobility. These are in line with the categories described by the London Accessible Housing Register (LAHR). Qualifying applicants will be advised of their mobility category in writing.

The Council will use the following categories to identify the mobility needs of those using Havering’s Choice Homes website and to show the types of adaptations in homes:

Category	Applicant profile	Examples of adaptations
MOBILITY - A 	The household has a member with significant mobility needs and who uses a wheelchair indoors and outdoors at all times.	<ul style="list-style-type: none"> • Level access • No stairs • Property adapted to a wheelchair standard • Level platform at main entrance • No changes in level throughout (inside and outside), or adapted to include lift/ramp access.
MOBILITY - B 	The household has a member with mobility needs who mainly uses a wheelchair outside and cannot manage steps or steep gradients.	<ul style="list-style-type: none"> • With level access throughout (inside and outside), or adapted to include lift/ramp access • Wide Main/Communal door/s • Bathroom containing toilet, basin and accessible bath/shower.
MOBILITY - C 	The household has a member with some mobility needs who is able to manage up to two steps to access the home	<ul style="list-style-type: none"> • On the ground floor with up to 2 steps access • Pathway/driveway/ramp from pavement level or parking space, no steep gradients • Bathroom suitable size to be adapted

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Housing Services

Housing Allocation Scheme (2021)

Public Consultation report

This report was created on Friday 09 April 2021 at 10:22.

The consultation ran from 11/01/2021 to 04/04/2021.

Total responses to this survey: **129**.

Comments from Hope4Havering were received after the close of this consultation. However, their have been included in the Comments section.

1.GENERAL INFORMATION

Question 1: What is your name?

There were 126 responses to this question.

Question2: What is your email address?

There were 124 responses to this question.

Question 3: What is your telephone number?

There were 118 responses to this question.

Question 4: What is your home address?

There were 119 responses to this question.

Question 5: Which of the following applies to you?

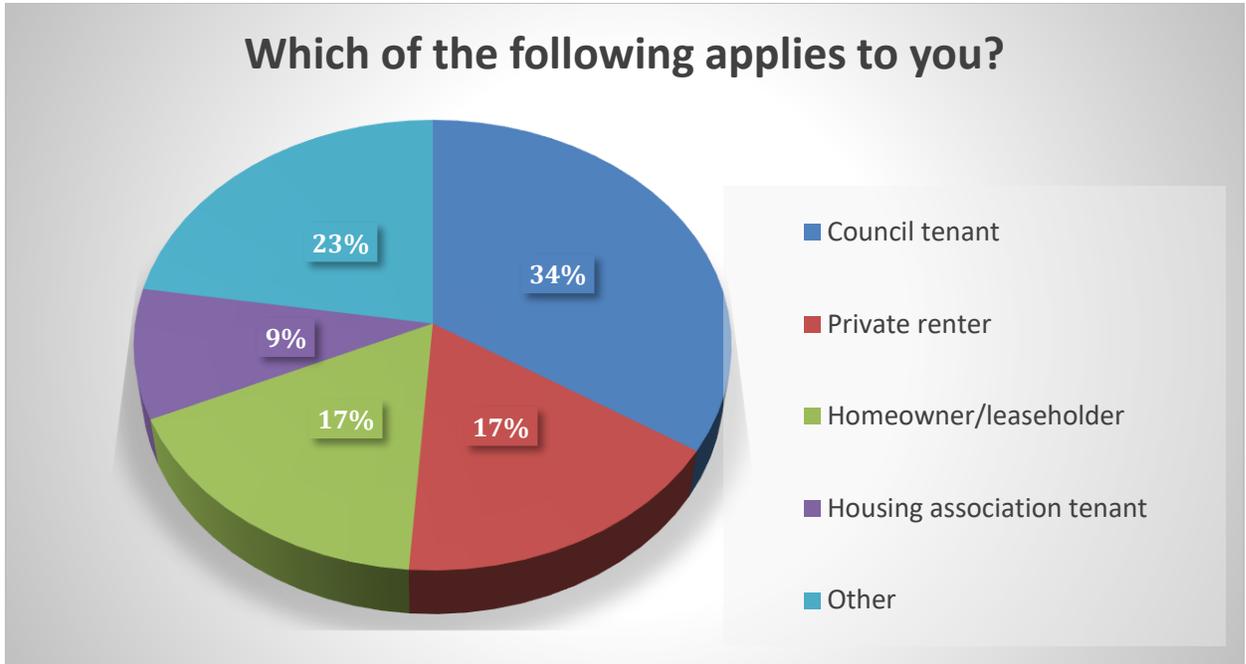
There were 129 responses to this question:

Council tenant	44	34.1%
Private renter	22	17.1%
Homeowner / leaseholder	22	17.1%
Housing association tenant	12	9.3%
Private landlord	5	3.9%
Letting agent	1	0.8%
Third sector charity / voluntary organisation	2	1.6%
Other housing provider	5	3.9%
Statutory organisation (e.g. NHS, Metropolitan police)	0	0.0%
Other public sector	1	0.8%
Business	0	0.0%
Other	15	11.6%
Not Answered	<u>0</u>	<u>0.0%</u>
TOTALS:	129	100.0%

If 'Other', please specify:

There were 21 responses to this question, labelled under 'Other –unspecified' (15), 'Other public sector' (1) and 'Other Housing provider' (5).

The following pie chart incorporate all 'Others' with segments that represent 5% or less of the total population (e.g. Third sector charity/voluntary organisations, Letting agents, private landlords, etc):



Question 6: Please indicate here if you do NOT wish us to retain your contact details for further consultation and feedback purposes.

There were 129 responses to this question:

Yes, I agree you can contact me	89	69.0%
No, I don't agree you can contact me	39	30.2%
Not Answered	1	<u>0.8%</u>
TOTALS:	129	100.0%

2. SURVEY ANSWERS - YOUR VIEWS

The Council has just under 1,000 households in temporary accommodation and approximately 2,000 households waiting for a Council property.

Although the demand is highest for two and three bedroom homes, there is a special focus on specialist supported accommodation.

We also have increasing demand for genuinely affordable homes.

Question 7: Aim 1

The Council is seeking to make best use of the social housing stock.

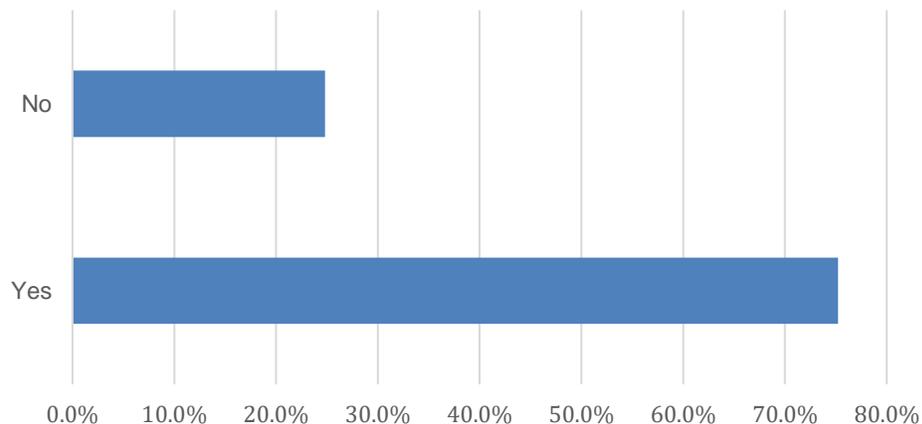
Do you agree with this aim?

There were 129 responses to this question:

Yes	97	75.2%
No	32	24.8%
Not Answered	<u>0</u>	<u>0.0%</u>

TOTALS: 129 100.0%

Aim 1: Do you agree with this aim to make best use of social housing stock?



There were 71 comments to this question.

Question 8: Aim 2

To provide housing that is suitable to the specific needs and requirements of households.

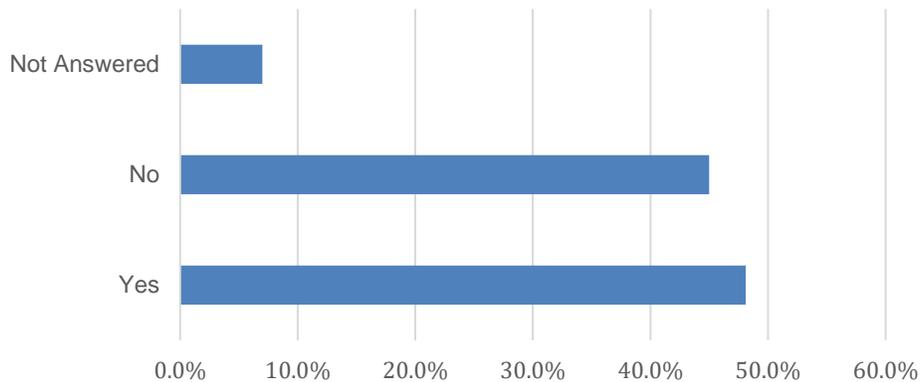
Has this aim been achieved through the proposed Allocations scheme?

There were 121 responses to this question:

Yes	62	48.1%
No	58	45.0%
Not Answered	<u>9</u>	<u>7.0%</u>

TOTALS: 129 100.0%

Aim 2: Has this aim been achieved through the proposed Allocations scheme?



There were 47 comments to this the question.

Question 9: Aim 3

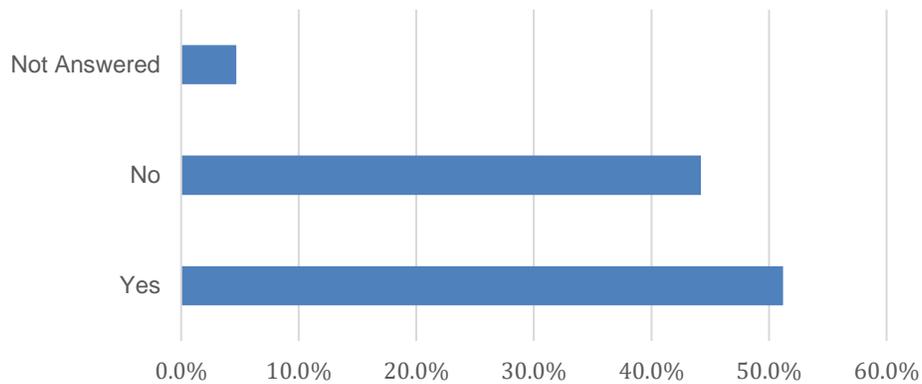
To prioritise households that have been assessed to be in most need and/or to those who make a positive contribution to our community.

Has this aim been achieved through the proposed Allocations scheme?

There were 123 responses to this question:

Yes	66	51.2%
No	57	44.2%
Not Answered	6	4.7%
TOTALS:	129	100.0%

Aim 3: Has this aim been achieved through the proposed Allocations scheme?



There were 51 comments to this question.

Question 10: Aim 4

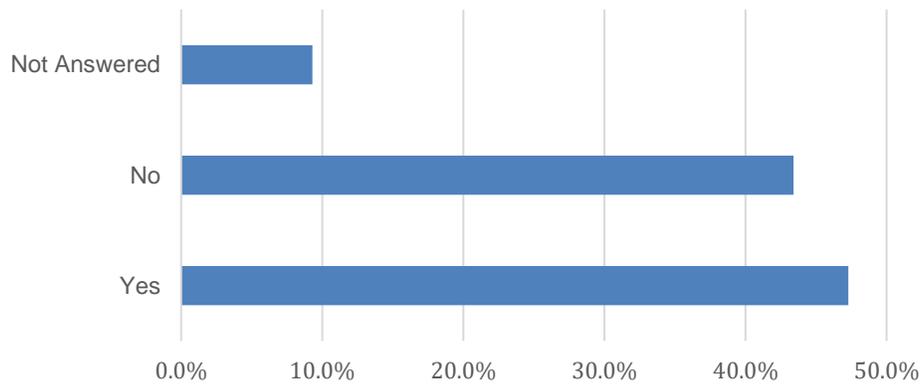
To help build sustainable communities and neighbourhoods.

Has this aim been achieved through the proposed Allocations scheme?

There were 117 responses to this question:

Yes	61	47.3%
No	56	43.4%
Not Answered	12	9.3%
TOTAL:	129	100.0%

Aim 4: Has this aim been achieved through the proposed Allocations scheme?



There were 37 comments to this question.

Question 11: Aim 5

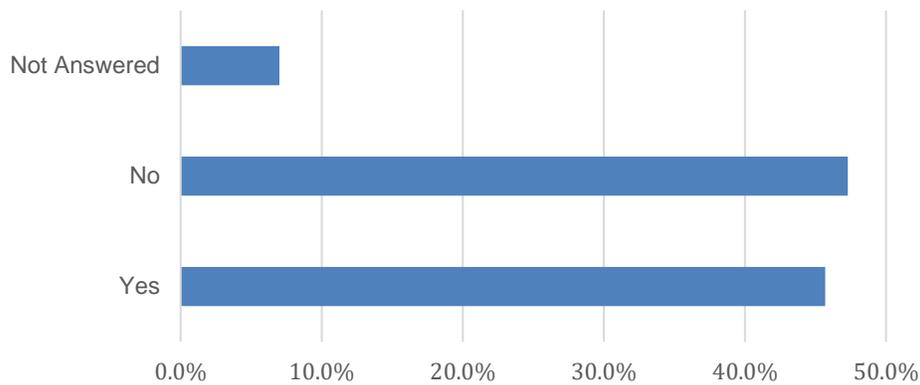
Ensure social and affordable housing is allocated in a clear, fair and transparent manner.

Has this aim been achieved through the proposed Allocations scheme?

There were 120 responses to this part of the question:

Yes	59	45.7%
No	61	47.3%
Not Answered	9	7.0%
TOTALS:	129	100.0%

Aim 5: Has this aim been achieved through the proposed Allocations scheme?



There were 44 responses to this part of the question.

Question 12: Aim 6

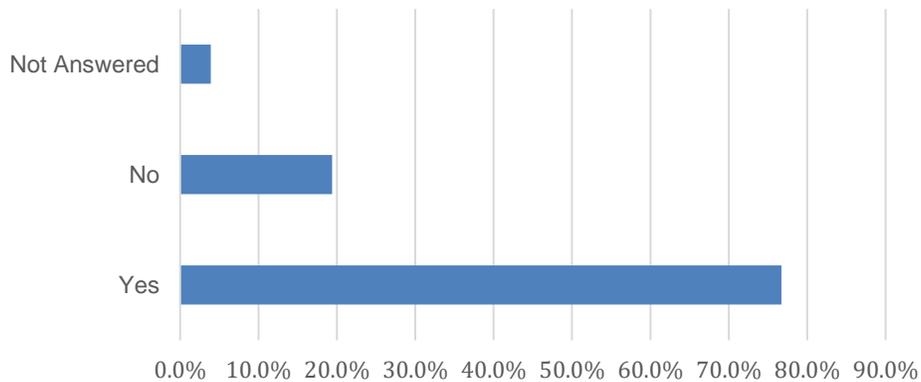
Do you think the Council should be developing low cost home ownership options, such as shared ownership, as well as to socially-rent homes? Building low-cost homes

There were 124 responses to this question:

Yes	99	76.7%
No	25	19.4%
Not Answered	5	3.9%

TOTALS: 129 100.0%

Do you think the Council should be developing low cost home ownership options?



There were 53 comments to this question.

PUBLIC FEEDBACK

Aim 1: The Council is seeking to make best use of the social housing stock. Do you agree with this aim?

- Local people should be given priority over travellers and refugees most local people make a substantial contribution to the community and have lived in the most if not all of their lives the area already has too many refugees and the travellers are a pain in arse the demographic of havering is being altered too much and it's becoming a horrible area to live in
- The homes should be a lot more cheaper like the older council properties.
- I don't feel the earnings bracket should be reduced. People on that wage can rent privately and people under it can claim benefits to help pay their rent until they can improve their situation
- The income threshold increase is ridiculous, people who are on low income already rely on the council to be housed and are waiting for ridiculous times to be housed. If you increase the income, more people will apply for social housing and the people with lower income will have to wait even longer to be housed.
- If people have to earn over £36,000 and up to £50,000 in order to afford to rent affordable housing, I'd strongly suggest that the housing is therefore not affordable. The council and HAs should not be building properties that people on an average wage, or less than this cannot afford. Leave that to the private sector where those on £36000+ should be more than able to rent. If they take housing stock, this means there is less available for others, including key workers who are often not well paid. Increasing eligibility from 6 to ten years living in the borough seems a cynical way of getting the number of people on the housing list down.
- Travellers & refugees must be treated the same to the rules for social housing. This is discrimination against all community members who pay taxes . But travellers & refugees can jump the que . Absolutely disgusting .
- How can travellers and refugees get housing before people have lived in the area all there life and gone to school and worked in the area I think it's disgusting you treating own community like this before people who come to the Borough your own community should come first not refugees or travellers should wait longer

- Being a mum of 3 I'm in a 2 bed flat every Friday I go onto the bidding system hoping I will be lucky I'm literally coming up 180+ For a 3 bedroom property

The thing is you don't realise some people's situation I'm on benefits and I am currently sleeping in my front room as I had to separate my 2 eldest and my son has behaviour issues he needs his own space and some days his temper is really dangerous it isn't right for my daughters mental health aswell as mine and for there safety I had no choice but to move my bed into the front room which is causing us less space aswell as being in lockdown it has been terrible horrible in fact ..

He also has started sleep walking we are living on a 2nd floor flat so you can imagine the worries we have now aswell as he isn't aloud to go on the balcony because he don't always think things through so my door is constantly locked if it's in his mind he will just do it ..

Also you don't realise I'm currently living In a flat with a nightmare neighbour just say asbos I got to the point were I was having anxiety attacks chest pains made myself really ill because of the hell we are still currently going through ... after reading the article on the 12th feb about the housing situation I'm now scared as it won't be looking likely that my children and I won't have no chance on actually having our forever home .. I don't ask for a new build I just ask for somewhere safe and where my children and myself can actually breath you don't realise being stuck in such a cramped home plays many effects on ourselfs where as someone states people that earn that wage are able to save up a deposit to privately rent ..

With living with asbos and living in a 2 bed the only option was to private rent .. but being on benefits I could not afford the £3,000 first months rent or deposit that is ridiculous I tried Believe me I tried so hard to save it as we need out of here but no luck so my only option is to wait many years now for a council property if I had the money I would of definitely looked for a 3 bed private accommodation because I have no choice but to look for a bigger home especially with my sons disabilities my children are 8 6 and 1 so they are getting older it's hits them massively academically especially my daughter as she has no free space to study and our relationship is literally on a thin ice as we dont have no where to take time out

It isn't fair that people like myself are having to struggle im 31 and I'm still not finally settled in constantly fighting to move so with this possibly happening In April I am feeling less positive that we have no chance of moving or even getting any kind of help

It's disheartening

Many thanks for taking your time in reading this I could go on an on but I won't I'm guessing you understand the situation we are in

Kind regards

- People that have been waiting for the 6 year residency rule, to go onto the housing list will now be told sorry its now 10 years. What happens when it's reviewed again in the future will it be 15 years?

What you are saying is these people will never get onto the housing list.
Your just moving the goalposts each time.
If people have waited their 6 years, what's the problem if they go on the list?

- The local born and bred in the areas should awarded a place before anyone else is considered.
- No I think British citizens British born or war veterans including rough sleepers should be on a short housing list. Refugees are illegal immigrants they should be sent back to their country or the first safe country they passed.
- This will be extremely detrimental to my young family. I lived in Havering with my family before having my children and settling in a different borough (Barnet). I was housed by Barnet in a property and after some time it came to light we were all being evicted due to "it being built against planning permission". I approached the council there and got no where other than come back on the day of my eviction. On this said day I decided the best thing to do was pack up my small children and go to my parents house in Havering and stay there until I could get something sorted. My parents lived in a 1 bedroom so was very over crowded I approached both Barnet and Havering for help with housing both in fairness was just as useless. In the mean time I was driving my eldest daughter to school in Barnet every day which in the end became unbearable for the both of us I then got my daughter into a school in havering as we were still at my parents. On approaching Havering council I got zero help just being passed back to Barnet in the end I have managed to find my own accommodation all be it small & expensive. The only thing I had in my favour at that time I was told was that after 3years I could apply to go on the council register however once I nearly reached that and it was then changed to 5years that was such a low point to know that me and my children had all settled both of my children attending nursery and school, my family living within the borough and myself working for the local council it being upped to 10years will absolutely destroy any hope I have of providing an affordable decent home for my children and myself, it also makes my working situation harder as increasing my hours and looking to go full time in this situation is near impossible as my rent is so much. I agree that so many points raised are great and validated however the implication on some with the idea of raising it to 10 years will be significant on some people/families i have never got help with accommodation and I feel this is taking away my only bit of hope. I hope what I said is really thought about and taken into consideration. Thankyou
- I was raised in Havering then moved away now i have been back for five years currently i private rent next year when i am 66 and retire i will not be rleageble to even go on the housing list till i am 70 what am i suposed to do next year when my income will halve and i will be evicted due to not being able to pay my rent
I have a heart condition disbetes sciatica but not classed as disabled i did not

joint the army navy or airforce what shall i do next year when i get evicted
Wait four years?

- Everyone is equal no preferential treatment should be given to refugees travellers or in fact any colour creed or race this system should be fair whether you are male female single married etc, social housing should revert back to that. If you cannot afford a mortgage or extortionate rents you should be accepted onto the housing register and be housed according to your place on the list. If you earn £50,000 a year you should not receive social housing above someone earning 15,000 a year.
- Residents should have grown up in the area. 10 years is not long enough. People in genuine need of council housing would probably not be able to save up £16,000-£30,000 and should not use low rents to give them an advantage over private renters paying full market rates.
- I agree with the 10 years living in borough rule and also strongly agree with the community contribution banding style. However I disagree that the income goes up to £50,000!! This is outrageous and nearly 3x the average wage!! If someone has a household income of £50,000 they really don't need to take social housing and can afford to private rent and get a mortgage easily ! And if they have £30,000 in savings then they have a deposit !
- I believe that travellers choose to travel and should have the same 10 years in the borough like everyone else.
- This will put many people who are already being pushed backwards after years of waiting further backwards in favour of those who join..
- I feel that we need to be focusing on our own borough first and to prioritise those who are working parents single parent who can not afford to rent private or save for a deposit not only this even if they do have savings for a deposit they may not have the credit needed to get a mortgage children should not be brought up in flats and houses should be prioritised not building more flats or small houses families need space not to be squashed up in small bedrooms also the properties that are already council old council properties need to be assessed and fixed or done up suitable for the families living in them before new properties are built the building I'm in has faulty electrics windows with gaps damp in the walls and subsidence plumbing issues also. I think if a property is made available for whatever reason and a resident on the bidding list is of a higher band and is paying full rent inquiries about it due to being close to family or suitable for children schools and safety they should be entitled to view the property I personally am paying full rent and council tax am a single parent with 3 little girls 2 have special needs and under chams living in the worst 3 bed maisonette 1st floor I am bidding due to being a victim of domestic violence I've been bidding nearly a year have asked about a property

now available opposite my mum and dad and 8 doors away from my nan and grandad perfect for us in regards to safety commuting and caring needs while I'm working I also have osteoarthritis in my spine and now can't carry my shopping up the 4 flights of 7 steps to get to my property and when it's wet the stairs are dangerous to be told no and keep bidding when I am still in the 50s and there are never any properties that are suitable for us I'm a NHS worker also and need to be close to work and schools my mum has water on the brain and heart and struggles to get home when I'm on late and she has my children in the pandemic I've gone weeks without seeing my girls and them in tears as they have to sleep on my mum's floor when they are there if I could even be considered for the property opposite would be so much better for us I'd even clear it out and decorate it myself I would move in as it is ASAP but the council don't work like this and property will most likely not even go on the bidding like the other 7 properties I've now seen in Harold Hill boarded up have not been on bidding the system needs re-assessing to work for those who contribute and are already living here 1st and the older building needs a lot of work done before new buildings are considered

- I moved out of Barking and Dagenham to Havering 3 years ago I've been trying to get on Havering's housing list as I was homeless and fleeing domestic violence with young children and was told I have to wait 6 years to get on the council list I tried to contact my previous borough but they stated to me I was not allowed to get my name back on their borough due to I left too long ago I am a single mum left with no choice but do private renting but it can be a struggle every month but I am getting there with the help would be nice if they didn't up the years.
- I agree that council should seek to make best use of social housing stock but the new suggested criteria do not meet that aim. The new suggested scheme prioritises people better financially situated and limits chances for people on low income but living in the council for less than 10 years. Best use of social housing stock means provide place for living for people in bad life situation, this is the main idea of social housing.
- I do agree with a few points, for a household who has an income of 50,000 a year? I mean if the council wants to prioritise, shouldn't prioritise those really in need? I mean I'm a single mother living in a share house with other 5 men who take drugs and drink all the time, where they harassed me and my son constantly, where I've got infections due to the lack of hygiene from them, where I haven't sleep at all for days because they threatened me and much more, and the council wasn't able to help, closed their ways and pretend I didn't exist. That you should change, that should be one of the most important aims CHILDREN and their mothers/fathers. Thank you
- It's unfair to people who've lived in the borough 5 years to have to wait an extra 5 to be considered while immigrants are exempt and raising the minimum

income just pushes the band higher ignoring more of the residents who are on benefits.

- I don't agree, because it should be consider the people who are living in this borough for more than 10 years, which is my case I have been living in this borough for 17 years and in my current address 10 years. So I will need to be in the waiting list for 10 years more? Is not fair regarding that I have 2 kids and my flat is only one bedroom, that at the moment I'm sleeping in the living room, to give them a space that they deserve as a children.
- No. 10 years is too long. It is excluding.
- Havering is such a rubbish area
- No I disagree, as I have been on the council waiting list in temporary accommodation for more than 10 YEARS having lived in the Borough for 18 years consistently. Also working as a Teaching Assistant in a mainstream primary for 9 years and still not been able to, even as a single mum, secure a permanent home is really upsetting.
- To up the number of years to 10 before you can apply for council housing would be detrimental to many residents including myself . I am 1 month shy of the 6 years needed , will I have a special allowance seeing as special allowances to other groups of only 5 years is being permitted ? Or will I have to wait another 4 years despite already waiting nearly 6 ? The other considerations seem fair , but I completely disagree with upping the residency to 10 years .
- I think more could be done
- I think as a secure tenancy council tenant of 26 years, if which I have mainly paid full rent. This should be considered in priority. I have been on the list since June 2015 (Then a CC1 band). Due to D.V. and relationship ending (arrest made), and having to take redundancy from 10 years Essex police employee, to look after my son, I was placed in Band H, since September 2015. I would have thought a house would have been obtained by now, some 6 years later. The Scheme states longest on the list but newcomers all seem to be gaining the properties.

Aim 2: To provide housing that is suitable to the specific needs and requirements of households. Has this aim been achieved through the proposed Allocations scheme?

- Again, I do not agree with the increased earnings threshold
- No because the specific need is for affordable housing for people who are on a low income.
- No I don't think it has as I'm in band H
I've spoke to many advisors
I have been told only way I can
Move my band and have a better chance of bidding is getting a diagnosis for my son
It's all well and good but I've been fighting for him to be put on the system since the age of 2 he is now 6 in June and we only got on the system 2 weeks ago my sons disability is so sever he does really need to see someone but with back Log aswell they can't tell me when he is likely to be seen it's going to take a while so I literally have no chance on being successful on our bidding system as over crowded
- I'm not happy with it
- It missed big time to older persons who gave been widely affected by the past year and is excluding them
There are many i council housing earning wrll over the av wage who do not need council housing
- My sons are unable to get social housing one works one unemployed neither are able to even get on the register.
- If you stopped giving tendencies to newham and Hackney residents they'd be more for those in Havering.
My son has been on the list for years and still waiting in Havering.
- After 11 years of being removed then added then removed and added to housing list this still will kit help those who are already supposedly suitably housed but are in fact not
- This doesn't put the residents 1st or those who are working 1st
- The new income threshold 50 000 pounds will open up an opportunity for people who are able to rent privately or apply for a mortgage and it will close the opportunity to people who are really in need and have not lived in the

council for the full 10 years. Criterion of 10 years continuous residency should be verified and set at a lower level.

Additionally, and very importantly, the people already on the Housing Register list who have not lived for the full 10 years in the council, should not lose their place. These families must keep their position on the list. At the time of submitting the original application, there were different rules that these people complied with and it would be unfair if these families were now eliminated from the list, especially that all these families are on low income. Many of them have no other chances of getting a flat or house and their hopes for a council house/flat would be taken away from them, for some perhaps forever. Instead, opportunities will be created for families who are much better financially, and their only advantage is that they have lived in the council for over 10 years.

- Other boroughs are paying 25 to 35k to their residents and guaranteeing properties in Havering. I know this personally to a Havering Council subcontractor employee. I think this is unfair and misleading to Havering residents.
- I do not agree that someone is allowed on the housing register to bid for a 1 bed and earning £50k but the same amount for a 4 bed need. It is very unfair and should be staged. Someone surely can easily afford private rented earning over £3000 a month. It may be different if they were a family wanting a 4 bed but this does not seem fair.
- Veronica Close used to have age restrictions especially for ground floor. Since this has been lifted, there has been a number of young families placed in one bedroom properties. The anti social behaviour of some has not boded well with the older / established residents.
- As mentioned, I feel that for those who do not qualify to join the housing register/key workers could be offered more support with affordable housing options such as key worker housing schemes/support to part buy/part rent schemes etc.
- I would like to see a certain volume of homes made available to Service Veterans - as per the scheme currently in operation in Lewisham and other Boroughs.
- Not all people who can't work are lazy. Some are ill
- The Scheme doesn't create any metrics in defining specific needs.
- This is just moving the pieces around the chess board, without resolving the fundamental problem of a chronic lack of genuine social housing, which is the only solution to the country's housing crisis.

- You need to consider long term residents that have fallen on bad times
- Personal answer no as I tick all boxes to be housed or at least helped but no change to anything for my situation.
- I'm not sure?
- Also there should be a clause that when a tenant becomes under-occupied they should be forced to downsize, allowing over-crowded waiting lists to decrease
- Well not yet
- Properties should go to English residents first who have lived here for 10 years (the councils new scheme). Why should properties be given to others who do not have a need and who aren't English!!!
- There is a section of society that is trapped in private renting which is expensive and unaffordable. They earn too much to get on the Housing list but their current rent is so expensive it eats up most of their income meaning that they cannot save a deposit to buy, and struggle to meet all their bills, getting into arrears. Not enough weight is given to the current property being unaffordable.

Aim 3: To prioritise households that have been assessed to be in most need and/or to those who make a positive contribution to our community.

- How does waiting 10 years decide how much good someone is doing for the community???
- People who have lived in the borough for less than 10 years still have a housing need. This would not be met if the proposed changes are made. Those most in need are likely to be on a low income. If homes are built that they can't afford this means there will continue to not be enough homes available for them. The focus should instead be on building more homes that people on below or average earnings, can afford.
- Give people housing on where they were born not people from out of area.
- What is a positive contribution classed as
I volunteered for NHS responded till advised by my universal credit advisor not to do it as i should be looking for employment not volunteering
- As said give the stock to those that live in Havering already and the homeless.
- Again I've been involved in the community and am still on the bottom rung after 11 years. The assessment and allocation based on needs is flawed already and I cannot see how this will make it better for those who are constantly overlooked..
- People really in need, who haven't lived in the council for the continuous 10 years, will lose their chance to get the house. People who are not in urgent need, like people with higher income threshold will get the chance of getting cheap flat. It is totally unfair.
- It should not be a lottery
- As stated before someone who earns 50k can afford their own property if 1 bed need, should be a lot less.
- Right to buy must be abolished. If tenants can afford to save £30k for property (especially if couples both working), they should be in private rented. Social housing is for those who are in need.

- Not everyone can make a contribution to the community some people are ill and with covid the jobs are few and far between
- The change in Scheme does not seem to provide housing for the most in need locals in Havering.
What is the metric for community contribution? - needs detail.
- Whilst I welcome the diversity of the population of the United Kingdom. I do feel prioritising refugees when there is a chronic shortage of housing for the Indigenous population is wrong.
- Long term residents need to be considered
- Not for myself ! I'm currently working and previously went to education gaining a degree to work within education myself which I do now, I also worked for a care home during the pandemic. Before that I worked in retail. I have always contributed to my community and I'm still in a unstable place with a child having to sofa surf when I can no longer stay in one place with my son
- No because it seems people who are able to buy different types of property seem to be buying up everything that is council available
- How do you assess whether a person makes a positive contribution to the community? I work in the art and culture industry and deliver mindful creative projects to Havering to help the community, would this be considered a positive contribution?
- Two conflicting criteria have been conflated in this aim, Households most in need for instance maybe with full time caring responsibilities for a disabled family member are extremely unlikely to have the capacity for making a positive contribution to the Havering community.
Those with inadequate income from one job may be working several jobs and also not have free time to commit to the wider community.
- Time on the waiting list does not relate to need. So although this would mean less people on the list and give those on the list more opportunity to move it may be by excluding people in more need.

Being more proactive in relation to mutual exchanges would be a cheaper way to go, although this is hampered by introductory and fixed term tenancies.

- No idea
- You haven't defined positive contribution well enough. My son is a foster carer and needs a 4 bedroom house but cannot get on the list and will not be offered

one because he is single. This means in order to foster care he has to private rent which is excessively costly on that size property.

- Definitely feel that the council need to work on this area as many vulnerable and disable residents are not given the priority they need .

Aim 4: To help build sustainable communities and neighbourhoods.

- Trying to fill houses with people who earn more will mean they are not around to build a community.
- There would be a danger of pricing out those on a low income from certain areas of the borough, which has already happened in other boroughs.

So instead of having diverse communities, where people from all walks of life come together, they are likely to become gentrified.

- Travellers have housing someone to live, what if joe bloggs just parked up a caravan and that was their place of living? They'd be evicted
- It isn't an achievement
- No so why change to another system that doesn't work...
Keep the stock fir those in Havering
- You place people from out of the Borough above our own and also those who have no desire to work or contribute above those who do whilst claiming to build a community. It's laughable that those who do contribute to a community are looked down on and dismissed in favour of benefits generation..
- The green spaces need to be kept and done up for the younger children with bits for the older children to do we do not have enough free or cheap activities for the youngsters to be involved in to stop youth crime or them hanging about the streets they need to learn respect and who to be responsible setting an example to the young not encouraging bad behaviour we need youth clubs and summer clubs young cooking clubs and so on that the older children can support younger children in doing we need community events and fundraisers we need to feel that government is looking out for us not working towards making money
- No more homes should be built people should do a swap
- We could become greener
- Our neighbourhood has become an overcrowded concrete jungle.
- Long term residents need to be considered

- It needs to be better if you have a park have a small reasonable priced cafe or stall for people to communicate in ways
- We do not have the infrastructure to take in more people from outside the Borough.
- No as I'm currently fighting on the system and literally don't see a light at the end of the tunnel to even being close on moving

I can't afford to go privately so have no choice but to be on the bidding system we're I don't have a leg to stand on

- Avoid these properties being sold to "Buy to Let" owners - as these tend to lead to a "transit" population, and less likely to contribute to a stable community.
- know what you mean by sustainable communities / neighbourhoods.
- If that is the case why do people have to have lived in the Borough for 10 years before they are able to try for a council house but refugees, Travellers need only have to be in the Borough for five years this is not right or fair.
- I currently live in a one bedroom flat with my 16 year old daughter. She sleeps in the bedroom and me living room. She is disabled. As of today I have a smashed window by my neighbour which has yet to be fixed. We are scared in our own home. We are overcrowded yet see people who have had the joy of a family home and refuse to downsize this is wrong
- I think people who are already in accommodation should be given the option of the 5 bands allocation as well.

Aim 5: Ensure social and affordable housing is allocated in a clear, fair and transparent manner.

- No Scheme will ever make that possible. It's all dependant on people.
- Don't think this is a fair process on earnings or residency for all reasons previously given.
- No affordability of property in london borough who can pay these rents
- Just one sided allocations never taking into account changing circumstancess
- It's never been a fair and will definitely not be now. Housing staff are not interested in helping those that work..
- Housing prices for new builds is so expensive residents are struggling and most of them are being paid by benefits working people can't afford them I couldn't so it can't be classed as affordable my massionett has a massive lounge and kitchen small bedrooms (not ideal) as no space for wardrobes but new builds are smaller more cramped and double my rent this needs reassessing homes need to have big bedrooms for space especially sharing rooms a nice lounge and either separate dinning rooms or big kitchens to fit a table and chairs people need space and places to store items gardens should be fair sizes not to big but not small and need storage spaces for outside equipment these things need considering not just get as many properties as we can to make money especially if half of them are paid by benefits it doesn't make sense you need to come live where we live for 6months and see what we all deal with and the struggles if small spaces we have the dramas with kids in the streets and noisy new because of thin walls
- New Allocation Scheme doesn't ensure that. It prioritises people better financially and closes the chances for people worse financially but living in council less than 10 years. It is not fair at all. It is not what social housing is for.
- Homes are built on green belt woodland and countryside wildlife habitat shouldn't be destroyed this will push wildlife animals to extinction
- Please read previous comment. You're ignoring the majority of the residents for those with higher income or immigrants
- This is a badly designed survey. I don't know what i am saying yes or no to. It is very unclear.

- Long term residents need to be considered
- Citizens Advice Havering does not believe gross annual income is a fair test of a household's ability to afford current rents. Gross income does not take account of different households having different priority expenditures or different property requirements. Will the Council consider (a) assessing individually each household's ability to pay the rent for the property they need or (b) having different thresholds for different categories of housing – eg a one bedroom flat would have a different threshold from a three bedroom house?
Having a single income threshold with no account taken of individual circumstances is not fair. A better way to judge this would be by undertaking an income and expenditure exercise for each individual application or setting a percentage of rent to income limit. So for example, if someone is in private rented accommodation and the rent is more than 40% of their income then they meet the eligibility criteria.
- Nothing is transparent, maybe collating information of who has been housed would show transparency.
- Until the scheme is in place - one cannot make a comment to this question. All future applications and judgements would need to be scrutinised by an independent community panel - to ensure these homes go to deserving families to contribute to the Borough community.
- If that is the case why do people have to have lived in the Borough for 10 years before they are able to try for a council house but refugees, Travellers need only have to be in the Borough for five years this is not right or fair.
- I believe people should be given the opportunity to move accommodation through the council and not just through mutual exchange.
- I feel there little information shared on this
- Your own community needs to come first
- 10 years residency exemption:
Within this criterion, a residency exemption will be granted to applicants of refugee status or of traveller background of five years, provided they have resided in the borough for five years continuously, and can demonstrate a community contribution such as paid, unpaid or voluntary work in the borough or being a recognised carer for an elderly or disabled adult or child

WHY SHOULD REFUGEES OR PEOPLE OF TRAVELLER BACKGROUNDS BE ABLE TO LIVE IN THE BOROUGH FOR A LESS AMOUNT OF TIME YET BE EXEMPT FROM THE 10 YEAR RESIDENCY. ITS CERTAINLY NOT PUTTING THE ENGLISH FIRST.

- The increase in salary cap from £36-£50 is counter intuitive. A person on a £50k salary should be able to afford private accommodation. Monthly salary of over £3k and average rental for a 3 bed house in Havering is £1,400 pcm which constitutes less than 40% of disposable income.
- New properties are too expensive
- News homes are NOT affordable
- I'm not sure it is being allocated very fair. I think there needs to be a overcrowded band for people like myself who are not homeless but our living situations are very uncomfortable, I am a single mother living in a box room with my two toddlers and to just put me in the home seeker band which gets overlooked and comes last. It's unfair. When there's 100 other people who will claim homeless just to get a social house.
- The earnings threshold is too high when those who earn that could easily rent or save for a deposit.

Aim 6: Do you think the Council should be developing low cost home ownership options, such as shared ownership, as well as to socially-rent homes? Building low-cost homes

- No, it never works, is hard to manage and just reduces the stock availability
- No just renting so there is housing for everyone
- This is a difficult one the idea is good but it needs to be more fair we need more affordable rent and it need to be cheaper than private renting all these new builds over 200 a week are more than some private properties and rent up front if you are already a council tenant your rent should carry over
- The housing market is hard to get on to and many people in this area struggle to make ends meet. Focus on rentals and let them know there is no shame in renting.
- I think the council should be building property s purely for renting
- The focus must be In providing good quality homes for the majority of the United Kingdom population who are living In Insecure, often poor quality private rented housing, subsidised through housing benefit, as a top up to the poor wages of an ever increasing cohort of the United Kingdom population.
- Help to buy is a valid scheme. Shared ownership is a total rip off high rent plus mortgage payments extortionate service charges per property which should be investigated.
- There wont be enough council properties if Havering council developed low cost home ownership options.
- We just need more rented social housing
- We just need council homes for rent !
- The councils around the UK shouldn't build thousands of homes everywhere. This will destroy wildlife habitat and Push wildlife animals to extinction. We won't have any green belt woodland or countryside left. So called asylum seekers are causing the housing shortages around the United Kingdom and adding to the population of England. The local councils should encourage people to do a home swap

- Unless the sales of such properties will be ringfenced for investment in building more social Housing
- Social housing only and no right to buy. If people can afford to buy a private home, they should move out of council homes and free them up for those in need.
- Shared ownership is not secure.
- Council should do more to rent property.

Keep properties for rent

- I feel at the current time and shortage it should focus on social rented properties, at the moment people are struggling to buy food and pay rent let alone save up for deposits
- I think the councils place people that are in urgently in need for homes before they sell the available property some new changes should come and more homes available to bid.

Is there anything else you would like to add relating to the proposed Allocations scheme?

- Leave it as it is. All this will do is make it harder for new people to get housed
- Please listen to your residents and don't just pretend to put money aside for a moment and think how you would like to live and look at what we live in and then make your decision
- There are many people on their own living in bigger properties than they need. I think they should be offered an incentive to move to a smaller property in an area they would like to move to. You would then have more properties available for families who need them
- Provide designated sites for the travelling community, and deprioritise refugees until the United Kingdom Indigenous population is adequately housed.
- 10 years is too long to have had to live and contribute to a borough when migrants, refugees and travellers do not have to this is a form of discrimination.
- You need to make it fair for the English residents of Havering who have a real need for housing and who have lived in Havering for 10 years and/or have made a contribution.
- I think the £50000 earning limit is too high and should be £40000 max. Also the savings cap should stay at £16000. You will just be encouraging people who can afford to buy to then get a council house for the discount and loads more will be lost through rtb.
Also I think the community contribution band is very good and should stay. Hopefully it will encourage more people into work
- Build accessible homes for disabled / elderly.
- Priority should be given to those who work that shows them to be worthy tenants by never falling behind with rent payments.
- Seems all fair . Hope it helps out more people to rent properties
- I am happy residents that have lived in the borough for over 10 years will get priority, I am hoping that the new proposal will help me in getting a 2 bed social rent property and improve my chances of work n better prospects

- More homes or flats should be available I can see more properties getting build but non of them are in bidding for people waiting to be placed in social homes
- A Fair Practice should be enforced. Several properties on this estate alone have become available, never on the bidding site and then allocated. It's not fair!
- The increase in saving and earnings limit are unfair to people who genuinely need social housing anyone earning 50k with savings of 30k are more than capable of privately renting a home
- Havering does not have enough social housing for single people. With more households than ever in this category, we should be building more for them. At the moment single people are very much the poor relations where housing allocations are concerned. This would also help with homelessness as many people find themselves homeless and in need of housing support after a relationship break up.
- You are favouring those who decide to have a faniky just to get housing allocations and leaving okder people out in the cold
- I really think we should do the 10 years in the borough but one size fits all. No special treatment for travellers they choose to travel, they're need is no greater than anyone else's.
- Try looking at the people who are working and those that don't. The system constantly punishes those who contribute to local economy and community in favour of those who never have any intention of working. There are families on the housing list who will never get houses because those who play the system or just don't care get seen to and processed first... after 11 years of being treated worse than those on benefits I don't and won't hold my breath that this council will help anyone who's making an effort to help themselves whilst needing help..
- I hope my suggestion will be taken into consideration. I feel really bad as I have waited for a council house for a long time and now these chances can be taken away from me, even though my financial situation does not allow me to get the house in a different way.
- As I said before so called asylum seekers are putting local councils around the UK under pressure to build thousands of homes everywhere in a 100 years time England won't have any green belt woodland or countryside left. All will be gone due to mass illegal immigration entering the UK pushing up the population of the United Kingdom

- HELP struggling single mothers, 2 bids a week with 700 other people is not enough and it is not fair. There's more houses than it shows, work with out of London councils there's enough housing for priorities, and if there's someone in high priority list then put them in the house don't let them fight for housing like dogs getting 2 bones (2 bids a week)
- Have more consideration for the residents who are already here
- Redo this badly designed survey.
- I feel by increasing the residency it will reduce the numbers of people on the housing register but also hides the fact that there are people requiring help and they will have to be assisted through other routes. I feel that qualifying time should remain the same but priority given to e.g downsizer who will free up accommodation for other families. I really disagree with the blanket income Scheme and think this is very unfair.
- Havering already has highest waiting time of 6 years just to join in council housing list. Making it 10 years will be too much for people like who is thrown out from Newham to havering because of homelessness.
- The scheme should take into account DV people who have fled to make a new safe life for them selves.
- You need to consider long term residents that have fallen on hard times
- The council must seek to quickly resolve the housing crisis by creating more social housing whether renting or low cost ownership to help meet the genuine housing needs of hapless residents.
- Please please look into bands properly as I feel like lower bands get no hope ! I have no idea if I'm getting any closer or just being left behind as the bidding list is very confusing and limited into what your doing right and wrong. U bid and get no response.
- They should treat all of us equally
- I have lived in the borough for 6 years and have been moved from two properties because the landlord wanted them back. I am self employed earning very little and now am in property that I cannot afford. Will I be exempt from the 10 year rule because I work or will I be moved down the list because I do not earn enough. I am very worried about this new proposal
- I just want a small flat for me and my baby with bath and garden

- In June 2020 national Citizens Advice research showed an estimated 2.6 million private renters had already missed, or expected to miss, a rent payment because of coronavirus. In the first two months of the lockdown Citizens Advice nationally helped people with over 1,000 issues related to possible eviction, despite the government's protections. Those numbers can only have increased in the nine months since they were published. When the current ban on evictions comes to an end (extended to 31 May 2021) these people, including many in Havering living in private rented accommodation will be at risk of homelessness.
How is the Council planning to deal with what could be a real crisis and how will the proposed Allocations Scheme respond to this threat?

- Yes, and I hope that everyone would be fair benefit on this scheme.
- Please don't forget the people that are actually in need

The ones that actually do need rehousing due to circumstances

The ones that have actually lived in havering all there lives

Ones that have no other option but to be put on the bidding system as they cannot afford to be housed any other way

Don't forget the residents like myself as you honestly don't understand that the bidding system is the only thing that is keep people positive at the moment I'm like 180+ I have a long way to go but it's something with the hell I'm going through currently I'm thankful but I cannot live like this anymore it isn't right

- If that is the case why do people have to have lived in the Borough for 10 years before they are able to try for a council house but refugees, Travellers need only have to be in the Borough for five years this is not right or fair.
- More needs to be done with people in homes that are too big. With the greatest respect of you want to you can purchase. They had their time and should think of those in overcrowding homes
- You should really consider offering the brand new accommodation to existing tenants as well as the people on the register.
- Thanks for the good work.,however the ten year residency seems to be quite too long considering the ever demanding reasons people keep moving

- The increase in Havering residency from 6 to 10 seem punitive to residents who may have contributed locally for 5 years. Also disadvantages younger members of society where 10 years is proportionately a larger portion of their life.
- I will say to help band 2A because healthy people getting depression because of a house and fight argument all this makes us depression of when we will move and sometimes feel like why am here I don't like this life anymore
- Hopefully I won't still be sharing a bed with my son when he turns 5,6 or even 10 as it's effecting my mental and physical health. If you want to make a change start putting us overcrowded/honest people on a peddle stool instead of leaving us at the bottom.
- Please do not up the criteria to 10 years. It will remove hope of council housing to people who have already waited years to register . If this is to go ahead there should be some allowances for people close to reaching the original criteria of 6 years
- Only that it appears to be a Good Proposal & Wish u Luck with all you Aim to Achieve..Just hope you never get that " One In A Million " tenant Who has a Complaint that Noone Understands??
- I think each case should be looked at independently not just as to who fits in each box. As A family of 6 living in a 2 bed flat with medical needs it feels like we are getting overlooked.
- Currently sleeping on a
- Bring back age restrictions on some properties.
- More should be available for mental health not just care places but actually flats
- to take into account that I work and I have a lot since I've been in the zona
- There are many many people living alone in 3 bedroom houses and this poor use of social housing. This section should be continuously assessed in order to free up more housing options to people who are struggling in overcrowded situations
- Hopefully proposal is acceptable by deciding panels and properties are not overpriced.

- I feel that the 36000 jump to £50000 should be 36000 - 60000 as there are a lot of working people crying out for houses especially with more than 1 child and also are willing to pay rent and bills on time due to working

So please bear this in mind

- Household threshold of 50k is too high. A family on such income and with savings can easily afford rent privately or buy a flat.
- There is a lack of affordable housing for people in need in Havering. A Scheme that reduces the number of people that will eventually secure affordable housing doesn't help those in the community who are living in poor conditions. We need to develop more options as a more sustainable longer term strategy.
- Do not flood the housing market with sub standard, high density developments. Listen to your residents
- Please help us
- We would love to move to a bigger home as we are overcrowded as your standards but we had gone over by £800 leaving us stuck and not knowing what to do I pay £115 a month this would bring me under but is not talking in to a count raising it would help the average price to rent in havering for a 3/4 bedroom is £1550 to £1800 a month we could not pay this and save up to buy our home which is our plan one day.
- I disagree with prioritising the Armed Forces
- Yes I think people in situations like myself there should be help to house them. I was told that I could go on the list because I am over 60 and have health conditions and that I would be helped but when I complete the on line forms it will not allow me because I own 5% which is not like I own my home. I have repairs that need doing that I cannot afford I have no proper heating my kitchen is not big enough to get a fridge in and I also need a downstairs toilet as I have copd and struggle with the stairs but I can't get housed
- I'm pleased with this Allocation Scheme proposal. I hope this will eventually benefit people who have been waiting for very long time on the register but not successfully got a permanent offer.
- People who rent should be allowed to join the housing register. It is more difficult for renters to save a deposit with high rents. We shouldn't be penalised for renting because there is no other option as housing through the Council is impossible.

- I think it is important to allocate housing to those who have lived in the area for a long time and therefore have family and friends close by . This then allows people to live in a closer, happier community.
- In previous conversations it was mentioned that you would agree that residents who move into the YMCA to receive their supported accommodation would not lose their Havering Status as a result of this - please can you let me know if this is the case?
- give tenants who got evacuation from their temporary accommodation from council because they turned down an offer, another chance to rehousing.
- I would again say please please look at all cases case by case and take circumstances into consideration. I feel that it is very unfair that people are penalised forever for situations that they found themselves in the past
- These updated criteria needs to replace the old criteria as there has been a lot of inflation and changes since it was first introduced and is a bit outdated so there needs to be some new criteria like the plans suggested.
- Yes please take look at the family with over crane citations first we need a help. Thanks.
- I do feel that the Local authority should feel comfortable is presenting their expectations from other providers. if local landlords wish to continue to receive state funds to support their rents, then they should be supporting the local challenge and make the appropriate changes to support the local mission

Do you have any further comments or suggestions?

- I would just like to reiterate that the room standard needs to be revised as a matter of urgency. Legal requirements for room standards have not been revised for a long time, and, in line with modern standards, having teenage boys sharing with girls under 10 is outrageous. These girls will be more heavily exposed to pubescent boys exploring all manner of new things that are not acceptable for a little girl to hear or see.
- Build more homes and flats for young people, offer council mortgages or shared ownership schemes
- PUT YOUR COMMUNITY FIRST NOT PEOPLE WHO HAVE BEEN HERE LESS TIME THAN THOSE THAT HAVE LIVED IN BOROUGH SINCE BIRTH OR HAVE BEEN ON HOUSING REGISTER FOR A LONG TIME SORT YOUR OWN OUT FIRST STOP LETTING US DOEN
- Personally , my 6 continuous years living in the Borough will be met in May..... I am in desperate need of joining the council housing waiting list for various reasons including medical grounds . I have already been declined a housing application despite working for years for this community , due to not meeting the 6 year criteria.....so to up the criteria to 10 years in April would mean I would loose out by a couple of weeks ! I believe that if the criteria is to be changed , then genuine residents like myself that are so close to meeting the original criteria should still be allowed to apply under the original criteria. If not , then this change will be a massive unfair blow to myself , and anyone in the same position as me .
- I suggest the council should tell people to do a home swap
- key worker housing schemes
- support to secure affordable housing/help to buy
- It is good that savings threshold is being raised to £30000 but I suggest that people earning over 50,000 should also be eligible for social housing where they meet the Residency requirements and want to remain in the Borough.
- Changes to the allocation needs to be made to prioritise those who have been resident in Havering longest and those in greatest need and therefore deserving this accommodation. This will make the allocation fairer and will support the neediest residents.
- I agree to the changes. However, it will be unfair for people who have lived in the borough for 9 and half years to be affected with the changes after contributing to the community and the love I have for Havering. I think 8 or 9

years of living in havering should stay on the register while the rest can be rejected

- Priority on council houses are being manipulated by them. Every Thursday night at 12:00 am, when the properties became available, the site don't workuntil 2 or 3 am, so when I get back I am already on 40 or 50 place bid. Coincidence? don't think so
- I think it would be better to go back to allocating people with homes as bidding just gets people hopes up and it isn't fair
- I agree, even though my borough is barking and dagenham there needs to be more affordable social housing as I'm being told my borough has no properties! Making me stuck in a situation that is impossible to live properly and I am 30 years old
- I have been in a private flat for 6 years in June. By you changing it I will have to remain for a further 4 years. I cannot afford this and this is not fair for people like me. I'm a single parent & a teacher, my wages barely cover my rent and I'm always struggling. Please think of us
- I applied in September of 2020 having lived in my current property for just over 6 years. Will my current application be affected now that that the residency for havering applicants will be changed to 10 years?
- My son and daughter live in havering one in the rip off disgusting YMCA the other in a badly managed social housing flat. Great flat poorly looked after by management, who waste council money on poor workmanship.
- Where's the shops that were promised with new build at Taybury court on Briar Road.
- Clamp down on sub-letting.

If you have tenants who are able to work but choose not to (preferring benefits) they should be the ones made to move out of the area, not those who have local work and would lose their jobs if they were reallocated.

- Make sure this scheme is monitored effectively. I am convinced that there are already many people who have moved into this Borough and have been given priority over long standing residents.
My children had zero chance of being housed by this council
- Havering already has highest waiting time of 6 years just to join in council housing list. Making it 10 years will be too much for people like who is thrown out from Newham to havering because of homelessness.

Also household income should stay in 36000 max. If people earn more than 36000 i am sure they can afford private rental or buy a property.

- As you would have gathered, I think these changes are the opposite of what we should be doing. Our focus should be on building truly affordable housing, plus making sure all private developments include a significant number of affordable homes, not just a token amount.
- So far a great work, just the priorities are a bit confusing.
- It would be interesting to see more about the different categories for bidding.
- Everyone's circumstances are different. This new proposal will affect many lives and the council must treat people as an individual and not a whole. Each person should be contacted about their own personal concerns and statuses.
- Look after the people of Havering with the stock, stop giving houses to other boroughs and use them fir those in need in the borough.
- I think it would be very good idea to let pregnant people be eligible for a 2 bed. So if someone is pregnant they can go on the list for the amount of rooms they would require once the baby is born. It then gives them a head start as far too many family's are overcrowded especially in tiny 1 bed flats for far too long
- I'm pleased with this Allocation Scheme proposal. I hope this will eventually benefit people who have been waiting for very long time on the register but not successfully got a permanent offer.
- Citizens Advice Havering congratulates the Council for not using bed and breakfast accommodation and for having an ambitious house building strategy that will result in 3,500 new homes in the next ten years of which 50% will be affordable. With more new housing stock in the pipeline Citizens Advice Havering believes it should not be necessary to increase the continuous residency requirement to 10 years. This is far longer than many other London Boroughs
- Thank you for all you do in these very challenging times
- As stated more priority for care givers who cannot work when in actual fact being a carer is a FULL TIME JOB.
- No - just sell the homes to owners - and NOT to "Buy-to-Let" landlords, who would simply rent these out to the same families that get no return or ownership for their rent payments!!

- Just Thankyou..
- Listen to us look at us and hear us we are living in your decisions but would you live in them? Walk in our shoes for a while would you enjoy living like us struggling to show our kids a good life and struggling to keep a roof over our heads most of us can't decorate or take our kids out for a day let alone a holiday due to the bills we pay living is a very high cost and covid has made it worse and harder some don't even have jobs any more be considering of us
- Working as a Teaching Assistant in a mainstream primary for 9 years hasn't helped me yet to secure a permanent home. This really needs addressing.
- Increasing the residency requirements from 6 to 10 years is not a good idea. It should be lowered instead to say 3 years or lower! Residents in genuine housing need will have to wait for 10 years to be eligible for social housing?? This is postposterous! I think it is a shameful proposition.
- I would like to know what the government is doing to help DV people fleeing domestic violence and wanting to have a new start. Should this social housing scheme not be purposely built to help people in need ?
- To realise not everyone can contribute to the community through no fault of their own. Also to offer a cash incentive for people living in properties bigger than they need to down size. Sometime s people won't move purely because they can't afford to redecorate or moving costs
- More options for housing rather than more restrictions to reduce the number able to apply for housing. There are many families whose lives will be negatively impacted by this Scheme. Another generation of children living in poverty and in overcrowded conditions is not addressed by restricting who can apply.
- On the application form please state clearly what each question means and what needs to be included as when it comes to income and savings it can be a bit of a grey area on what is meant by savings and income.
- that I am a single mother and that I work but I can't afford to pay all the rent to the agency
- Help those who work not those who don't first..
- We would love to move to a bigger home as we are overcrowded as your standards but we had gone over by £800 leaving us stuck and not knowing what to do I pay £115 a month this would bring me under but is not talking in to a count raising it would help the average price to rent in havering for a 3/4

bedroom is £1550 to £1800 a month we could not pay this and save up to buy our home which is our plan one day.

- I think I should be considered for housing as I believe I am in need.
- Six years is enough no one should get any home who have been in the borough less than 6 years ten is too long circumstances change lives change thorough not fault this excluded too many
- Consider long term residents that may have not required social housing in the past
- Priority should be to English residents!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!
- I agree with it, it needs to be expanding to existing tenants as well as new tenants. It would be great to have the opportunity to have the option to pick the best level band accommodation.

Email response from Kim Merry, CEO of Hope 4 Havering, received 5 April 2021:

1. 10 years continuous residency

In my experience some of the homeless people we meet have to sofa surf or stay with people from outside the borough as they are not in a position to choose when they have no means. Also they maybe offered housing in another area such as Harlow or Southend because the rent in our borough is unaffordable whilst having all their original roots and family within the Havering Borough. This Scheme puts the most vulnerable at risk rather than helping them.

2. 10 years residency exemption

I wanted to query what would happen to a vulnerable refugee family before the 5 years in the borough do they not qualify for help or housing at all? I can't see how a traveller family who has their roots in Havering can be penalised by staying for periods in other areas if this is their home town. I like the fact that people are rewarded for contributing to their community but wonder whether the people themselves know that this is a criteria or whether they have the capacity in each of their circumstances to either work or volunteer.

3. The income threshold is too high

I can not understand how people who can fully support themselves with incomes upto £50k need the help of social housing. It would appear to me that this Scheme is helping those who have rather than those who have little. I would think the general public would find this both surprising and unfair if this was known widely. I am shocked personally to think that those earning those kind of amounts are qualifying for special support.

4. The Amount in Savings limit is too high

I am concerned that this scheme is very much benefitting the people who have rather than those who don't. I was extremely surprised to see that people with I would consider a large amount of savings would benefit from social housing. I thought social housing was meant to benefit those who couldn't help themselves.

I do understand that there is a fine balance between helping people move forward and enabling those who are stuck but don't wish to change and that there is a stick and carrot approach to this Scheme. But if these changes to the Scheme appear to not support those most vulnerable and therefore does not have my support. By increasing the savings and income surely the numbers who could be potentially housed increase rather than decrease? The Scheme would suggest to me that some kind of social segregation is being implied both by not providing enough affordable properties and making the possibility in the future even more remote. As more local authorities bring other people into our borough by paying larger incentives than Havering the case for housing for people indigenious to Havering becomes more and more an unattainable dream than a reality.

APPENDIX 2: Equality and Health Impact Assessment (EqHIA)

Question 15: Gender

There were 126 responses to **this part** of the question:

	Total	Percent
Man	24	18.60%
Woman	94	72.87%
Gender Neutral / Agender	2	1.55%
Trans Woman	1	0.78%
Trans Man	0	0.00%
Non-Binary	0	0.00%
Other	5	3.88%
Not Answered	3	2.33%

Question 16: Relationship Status

There were 124 responses to this part of the question:

	Total	Percent
Single	62	48.06%
Married	43	33.33%
Civil Partnership	1	0.78%
Co-habiting	4	3.10%
Widowed	4	3.10%
Prefer not to say	5	3.88%
Other	5	3.88%
Not Answered	5	3.88%

Relationship other

There were 3 responses to this part of the question.

Question 17: Age

Age

There were 125 responses to this part of the question:

	Total	Percent
Under 18	0	0.00%
18-24	4	3.10%
25-34	40	31.01%
35-44	31	24.03%
45-54	23	17.83%
55-64	13	10.08%
65-74	6	4.65%
75-84	1	0.78%
85+	0	0.00%
Prefer not to say	7	5.43%
Not Answered	4	3.10%

Question 18: Sexual Orientation

There were 122 responses to this part of the question:

	Total	Percent
Bisexual	8	6.20%
Gay	3	2.33%
Hetrosexual (straight)	89	68.99%
Lesbian / Gay Woman	2	1.55%
Prefer not to say	16	12.40%
Other	4	3.10%
Not Answered	7	5.43%

Other Sexual Orientation

There were 2 responses to this part of the question.

Question 19: Faith, Religion or Belief

There were 123 responses to this part of the question.

	Total	Percent
Christian	55	42.64%
Muslim	12	9.30%
Jewish	0	0.00%
Hindu	1	0.78%
Buddhist	0	0.00%
Sikh	1	0.78%
No Religion	35	27.13%
Prefer not to say	15	11.63%
Other	4	3.10%
Not Answered	6	4.65%

Other Religion

There was 1 response to this part of the question.

Question 20: Are you pregnant or have you given birth in the last 26 weeks?

There were 122 responses to this part of the question:

	Total	Percent
Yes	13	10.08%
No	101	78.29%
Prefer not to say	8	6.20%
Not Answered	7	5.43%

21: Do you have unpaid responsibility for a child as a parent / guardian etc.?

There were 124 responses to this part of the question:

	Total	Percent
Yes	37	28.68%
No	73	56.59%
Prefer not to say	14	10.85%
Not Answered	5	3.88%

Full or Part time childcare

There were 40 responses to this part of the question:

	Total	Percent
Full-time	33	25.58%
Part-time	7	5.43%
Not Answered	89	68.99%

Age of child/children

There were 57 responses to this part of the question:

	Total	Percent
Aged 0 to 4 (preschool)	32	24.81%
Aged 5 to 10 (primary)	33	25.58%
Aged 11 to 18 (secondary)	27	20.93%
Not Answered	72	55.81%

22: Are you a British / United Kingdom citizen or national?

There were 125 responses to this part of the question:

	Total	Percent
Yes	101	78.29%
No	15	11.63%
Prefer not to say	9	6.98%
Not Answered	4	3.10%

Citizenship and Nationality

There were 17 responses to this part of the question:

	Total	Percent
EU National	9	6.98%
EEA National	0	0.00%
Indefinite Leave to remain/enter	4	3.10%
Refugee	1	0.78%
Asylum Seeker	0	0.00%
Other	3	2.33%
Not Answered	112	86.82%

Other Nationality

There were 5 responses to this part of the question.

23: Ethnic origin is not about nationality, place of birth or citizenship. It is about the group to which you perceive you belong.

White

There were 82 responses to this part of the question:

	Total	Percent
White - British	67	51.94%
White - Irish	2	1.55%
White - Gypsy or Irish Traveller	0	0.00%
White - European	10	7.75%
Other - White background	3	2.33%
Not Answered	47	36.43%

Mixed/multiple groups

There were 8 responses to this part of the question:

	Total	Percent
Mixed/multiple groups - White and Black Caribbean	1	0.78%
Mixed/multiple groups - White and Black African	4	3.10%
Mixed/multiple groups - White and Asian	2	1.55%
Mixed/multiple groups - Other mixed background	1	0.78%
Not Answered	121	93.80%

Asian/Asian British

There were 12 responses to this part of the question:

Option	Total	Percent
Asian/Asian British - Indian	1	0.78%
Asian/Asian British - Pakistani	3	2.33%
Asian/Asian British - Bangladeshi	4	3.10%
Asian/Asian British - Chinese	0	0.00%
Asian/Asian British - Other Asian background	4	3.10%
Not Answered	117	90.70%

Black/Black British

There were 11 responses to this part of the question:

Option	Total	Percent
Black/Black British - African	4	3.10%
Black/Black British - Caribbean	4	3.10%
Black/Black British - Any other	3	2.33%
Black/African/Caribbean background		
Not Answered	118	91.47%

Other ethnic group

There were 4 responses to this part of the question:

	Total	Percent
Other ethnic group - Arab	1	0.78%
Other ethnic group - Prefer not to say	1	0.78%
Other ethnic group - Other ethnic group	2	1.55%
Not Answered	125	96.90%

Prefer not to say ethnicity

There were 16 responses to this part of the question:

	Total	Percent
Yes	16	12.40%
No	113	87.60%

24: Do you consider yourself to have a disability, impairment or health condition?

Disability

There were 124 responses to this part of the question:

	Total	Percent
Yes	31	24.03%
No	78	60.47%
Prefer not to say	15	11.63%
Not Answered	5	3.88%

Impairment

There were 35 responses to this part of the question:

	Total	Percent
Sensory - e.g. mild deafness; partially sighted; blindness	1	0.78%
Physical - e.g. wheelchair user	4	3.10%
Mental Illness - e.g. bi-polar disorder; schizophrenia; depression	22	17.05%
Development or Educational - e.g. autistic spectrum disorders (ASD); dyslexia and dyspraxia	3	2.33%
Learning Disability / Condition - e.g. Down's syndrome; Cerebral palsy	0	0.00%
Long-term Illness / Health Condition - e.g. cancer, HIV, diabetes, chronic heart disease, stroke	11	8.53%
Other	8	6.20%
Not Answered	94	72.87%

Housing Allocation policy

Equality and Health Impact Assessment (EqHIA)

Document control

Title of activity:	Housing Allocation policy
Lead officer:	Darren Alexander, Assistant Director Housing Demand
Approved by:	Patrick Odling-Smee, Director of Housing
Authors:	Kwabena Obiri, Housing Choice & Applications Manager, Joe Agius, Strategy & Policy Officer
Date completed:	24/09/21
Scheduled date for review:	October, 2022

Did you seek advice from the Corporate Policy & Diversity team?	
Did you seek advice from the Public Health team?	
Does the EqHIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	No

1. Equality & Health Impact Assessment checklist

About your activity

1	Title of activity	Housing Allocation policy		
2	Type of activity	Policy Housing lettings		
3	Scope of activity	<p>This policy applies to new applicants, (including homeless households), and to existing tenants transferring from one property to another.</p> <p>The Housing Act 1996, (as amended by the Homelessness Act 2002, the Localism Act 2011 and the Homelessness Reduction Act 2017), requires local authorities to make all housing allocations and nominations in accordance with a Housing Allocation policy.</p> <p>A summary of this Housing Allocation policy must be published and made available free of charge to any person who asks for a copy.</p>		
4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes	If the answer to <u>any</u> of these questions is 'YES', please continue to question 5 .	If the answer to <u>all</u> of the questions (4a, 4b & 4c) is 'NO', please go to question 6 .
4b	Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?	Yes		
4c	Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?	Yes		

Completed by:	Kwabena Obiri, Choice and Allocations Manager Joe Agius, Strategy & Policy Officer
Date:	29/09/21

How this policy will impact on people?

Background

Social housing is provided by social landlords – generally, local authorities or housing associations. However, it has been clear for some time that housing supply is not keeping up with

demand. Affordable housing however is broader and includes all housing that has received a public subsidy or grant in its development.

Demand for social housing in Havering significantly exceeds the number of properties available. In the financial year 2019-2020, only two in every 10 households on the housing register had a realistic prospect of getting social housing. This policy sets out how the Council will prioritise access to the available housing.

Purpose of this policy

The Housing Act 1996 Part VI requires local authorities to give reasonable preference in the way they allocate their available social housing.

The purpose of this policy is to clearly explain how Havering Council, (“the Council”), decides how available social housing is allocated. It sets out the Council’s eligibility, qualifying and housing need criteria to ensure priority is fairly assigned and allocated to households in the greatest need. It also sets out how the Council will enable access to other forms of affordable housing such as shared ownership and intermediate rented housing.

Aims of this policy

The aims of this policy are to:

- ensure that we make the best possible use of the social housing stock;
- provide housing that is suitable to the specific needs and requirements of households;
- prioritise households that have been assessed to be in most need and to those who make a positive contribution to our community;
- help build sustainable communities and neighbourhoods, and
- ensure social and affordable housing is allocated in a clear, fair and transparent manner.

Scope of this policy

This policy applies to new applicants, (including homeless households), and to existing tenants transferring from one property to another.

The Housing Act 1996, (as amended by the Homelessness Act 2002, the Localism Act 2011 and the Homelessness Reduction Act 2017), requires local authorities to make all allocations and nominations in accordance with an Allocation Scheme. A summary of the Allocations Scheme must be published and made available free of charge to any person who asks for a copy.

This document is available on the Council’s website: www.havering.gov.uk and paper copies will be provided on request.

The Housing Act 1996 (as amended) requires local authorities to give reasonable preference in their allocations policies to people with high levels of assessed housing need. The main groups are:

- People who are homeless as defined by the Housing Act 1996, Part 7;
- People who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985), or who are occupying accommodation secured by any such authority under section 192(3);
- People occupying insanitary or overcrowded housing, or who are otherwise living in unsatisfactory conditions;
- People who need to move on medical or welfare grounds (including any grounds relevant to a disability); and

- People who will suffer hardship to themselves or to others if they are unable to move to a particular locality or district.

In addition to the above, the Council also exercises its statutory discretion to grant additional preference and/or to determine priority between applicants with reasonable preference. Applicants in reasonable preference categories makeup around 61% of the Council's housing register – comparatively reasonable preference made up around 47% of all Council allocations in 19/20, contributing to 214 of 455 lets. Whilst there is slightly larger demand for accommodation than supply for applicants of reasonable preference, the figures show that they are overall treated fairly, contributing to just under half of all Council lets.

The Act also requires local authorities to state within the policy what its position is on offering applicants a choice of housing accommodation, or offering them the opportunity to express preference about the housing accommodation to be allocated to them.

The current policy was agreed by the Cabinet in 2016 and since then there have been changes in the legislation and the review has been conducted to ensure that the policy meets with current legislation and guidance.

In summary – the proposed key changes

The new, Housing Allocation Policy will introduce the following key changes:

1. Qualification Criteria

- **6 years continuous residency:**

In order fulfil the Council's qualification criteria to join the Housing Register, an applicant will be required to demonstrate a continuous residency of six years in the borough of Havering.

- **Residency exemptions**

A new exemption to the residency criterion will be granted to applicants of refugee status or of traveller background of five years, provided they have resided in the borough for five years continuously, and can demonstrate a community contribution such as paid, unpaid or voluntary work in the borough or being a recognised carer for an elderly or disabled adult or child. Further exemptions will also be introduced for members of the armed forces, under-occupiers of social housing, people who fall within the reasonable preference groups, those who have the "right to move", victims of domestic abuse, and exceptional cases.

- **Income threshold:**

In a change to the previous policy, the gross income threshold for applicants has been raised from £36,000 to £50,000 and a change of the savings limit to £30k.

This is proposed in recognition of the changing financial climate. Applicants who come above this threshold will not qualify to join the register.

2. Banding Changes

- Change to five new bands and new prioritisations within the bands. Increased priority for households with medical conditions that affect their housing and care leavers.
- Applicants previously placed under the Reduced Priority banding will no longer qualify for social housing apart from those who fall within a reasonable preference criteria as defined by the Housing Act 1996, Part 6.

- Establishment of an “Opportunity Register” to enable households not able to join the register to join and have their housing needs recorded and access other housing options.

Who will be affected by the activity?	
Applicants to the Havering Council Housing Register to seek housing.	
Protected Characteristic - Age	
<i>Please tick (✓) the relevant box:</i>	Overall impact: Neutral
Positive	<p>This policy states an Age qualification for applicants to be placed on the Council’s Housing Register. This is:</p> <p><u>Age - Applicants must be 18 years of age or over</u></p> <p>The Council will not normally grant a tenancy to anyone under the age of 18 years unless another adult is prepared to act as their guarantor and agrees to cover the rent or any arrears.</p> <p>Exception: The age qualification criterion will not apply where a young person, aged under 18 years, is owed a duty under current legislation, but is unable to access suitable accommodation other than by being given an offer of council or housing association accommodation. In exceptional circumstances, the Council can grant permission to occupy a property to an applicant under 18 years by means of an Equitable Agreement.</p> <p>The policy therefore is inclusive of all eligible persons and does not discriminate on the basis of age, except in the case where persons are under 18 years old and in which case exemption is made according to the duty owed to some young people under legislation as stated above.</p> <p>Applicants to sheltered housing will not be affected by the residency criteria. There is also an exemption for those households that need to give or receive care.</p>
Neutral	
Negative	
	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>

Evidence:

Declining mortality rates mean higher life expectancies.

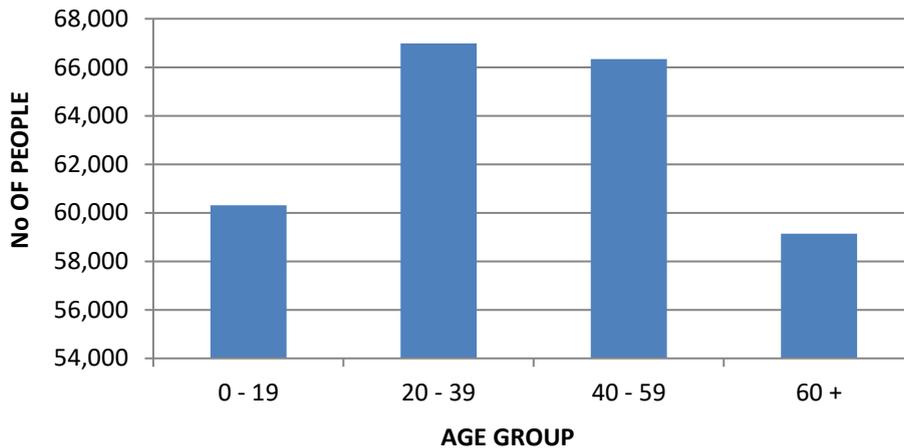
A newborn male baby in the UK today can expect to live for 79.2 years and a girl to 82.9 years, with 22.6% of newborn boys and 28.3% of newborn girls projected to live to 100 years old¹.

- Havering has the oldest population in London with a median age of 40 years, as recorded in the 2011 census.

¹ Article: ‘Living longer; how our population is changing and why it matters’ (Office for National Statistics, August 2018)

- The life expectancy at age 65 years in Havering is 19 years for males and 21.7 years for females. The life expectancy at birth for people living in Havering is 80.2 years for males and 83.9 years for females.
- From 2011 to 2016, Havering experienced the largest net inflow of children across all London boroughs. 4,580 children settled in the borough from another part of the United Kingdom during that five-year period.
- It is projected that the largest increases in population up to 2033 will occur in the following age brackets; children (0-17 years), and older people age groups (65 years and above).

HAVERING - BY AGE GROUP



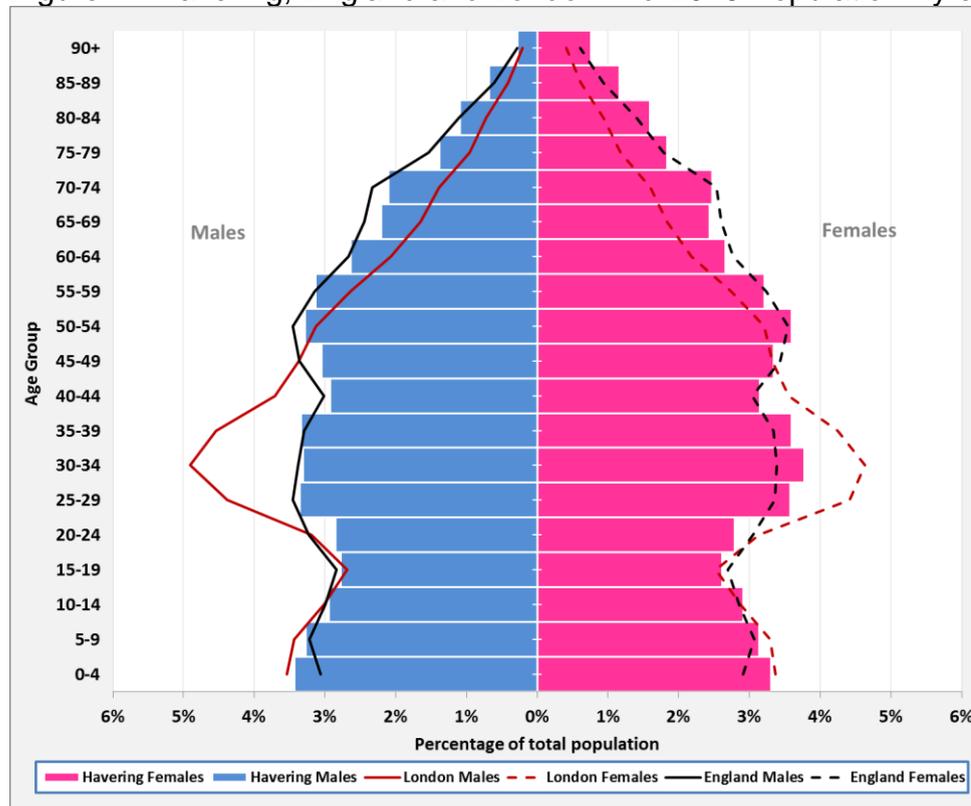
The Havering population is estimated to be 257,810 (ONS, 2018). The table below gives a breakdown by five year age bands and gender.

Age Band (Years)	Male	Female	Persons
00-04	8,850	8,520	17,370
05-09	8,429	8,081	16,510
10-14	7,595	7,503	15,098
15-19	7,166	6,743	13,909
20-24	7,351	7,198	14,549
25-29	8,642	9,220	17,862
30-34	8,526	9,742	18,268
35-39	8,614	9,268	17,882
40-44	7,542	8,125	15,667
45-49	7,868	8,624	16,492
50-54	8,460	9,279	17,739
55-59	8,072	8,290	16,362
60-64	6,806	6,860	13,666
65-69	5,696	6,272	11,968
70-74	5,417	6,379	11,796
75-79	3,561	4,741	8,302
80-84	2,817	4,121	6,938
85-89	1,747	3,000	4,747
90+	719	1,966	2,685
All Ages	123,878	133,932	257,810

Havering has the oldest population in London with a median age of 39 years. There are approximately 60,102 persons aged 65 and over in Havering. This is more than a fifth of the whole population (23.3%).

Figure 1 below shows a much older age structure for the population of Havering compared to London but similar to England.

Figure 1 : Havering, England and London Mid-2018 Population Pyramid



Data source: ONS 2018 Mid-year population estimates.

The increased age of residents within Havering could see mean that there is an increased pressure for smaller or sheltered type properties.

Sources used:

- This is Havering 2019/20 version 4.4, Public Health Intelligence
- ONS 2018 Mid-year Population Estimates

Protected Characteristic – Disability

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact: Positive

This policy decides on applicants cases based on a number of criteria, including an applicant's health and consequent housing need priority. The policy states:

MEDICAL

The medical element of the assessment is based on whether the

applicant's health, or a member of their household's health, would improve by moving to alternative accommodation. Consequently, medical priority is awarded according to the extent to which the health or welfare of one or more members of the applicant's household, is affected by their current housing conditions and the expected benefits of providing suitable alternative housing.

Applicants are asked to complete a Medical Assessment Form. A Housing Assessment Officer will consider the information supplied by the applicant, along with any further and necessary information supplied by other parties such as health professionals and housing officers.

Applicants claiming to have a severe and enduring mental illness will need to demonstrate that they currently have, or have recently had, access to Havering Mental Health Services.

Depending on the circumstances, medical priority can be awarded under the Band 1, 2a or Band 3. The following table is used as a guide to how medical priority is determined:

<i>Medical Condition</i>	<i>THE EFFECT OF CURRENT HOUSING ON THE APPLICANT'S HEALTH</i>		
	<i>Severe</i>	<i>Moderate</i>	<i>Low</i>
<i>Serious</i>	<i>Band 1</i>	<i>Band 2a</i>	<i>No medical priority</i>
<i>Moderate</i>	<i>Band 2a</i>	<i>Band 3</i>	<i>No medical priority</i>

Applicants who clearly have an urgent need to move because they have a critical medical condition, or very serious disability, will be placed in the Band 1. This is an improvement compared to their priority under the current Allocation Scheme.

Therefore, the policy makes due consideration of the disability and/or severe health issues of an applicant and provides a bespoke service to consider an individual's health circumstances in deciding their Housing Register application. This should improve the outcomes for disabled applicants.

Evidence:

- In 2017, 3,506 adults (aged 18-64 years) were estimated to be living with serious physical disabilities in Havering.
- The estimated rate of serious physical disabilities in Havering (2,323 per 100,000 population aged 18-64 years) is similar to England but significantly higher than London average. It is one of the highest rates within London local authorities (see Figure 22). One of the key reasons for this is likely to be due to the relatively older population in Havering compared to other London boroughs.

Please note: Rate per 100,000 calculation uses mid 2016 population.

The following shows the prevalence of various disabilities in Havering:

Table 1: Number of people aged 18-64 with disabilities in Havering by age band, 2020

Age band	Number with learning disability	Number with Impaired mobility	Number with serious visual impairment	Number with moderate or severe, or profound hearing impairment
18-24	519	192	12	347
25-34	911	366	24	791
35-44	882	1,790	23	1,652
45-54	792	1,685	22	4,271
55-64	721	4,438	21	8,143
18-64	3,824	8,471	102	15,204

Table 2: Number of people aged 18-64 with mental health problems in Havering, 2020

Mental health problem	Number
Common mental disorder	29,906
Borderline personality disorder	3,796
Antisocial personality disorder	5,184
Psychotic disorder	1,100
Two or more psychiatric disorders	11,327

Table 3: Number of people aged 65 & over unable to manage at least one mobility activity on their own in Havering, 2020

Age band	Number
65-69	1,023
70-74	1,642
75-79	1,506
80-84	1,740
85 and over	3,410
65 and over	9,321

Table 4: Disabled population with medical needs

Band	Medical Type	Total	% of Register
<i>ER</i>	<i>Special Needs</i>	<i>7</i>	<i>0</i>
	<i>Severe Medical</i>	<i>18</i>	<i>1</i>
<i>CC2</i>	<i>Disability</i>	<i>60</i>	<i>3</i>
<i>H</i>	<i>Moderate Medical</i>	<i>35</i>	<i>2</i>

Sources used:

This is Havering (2018)

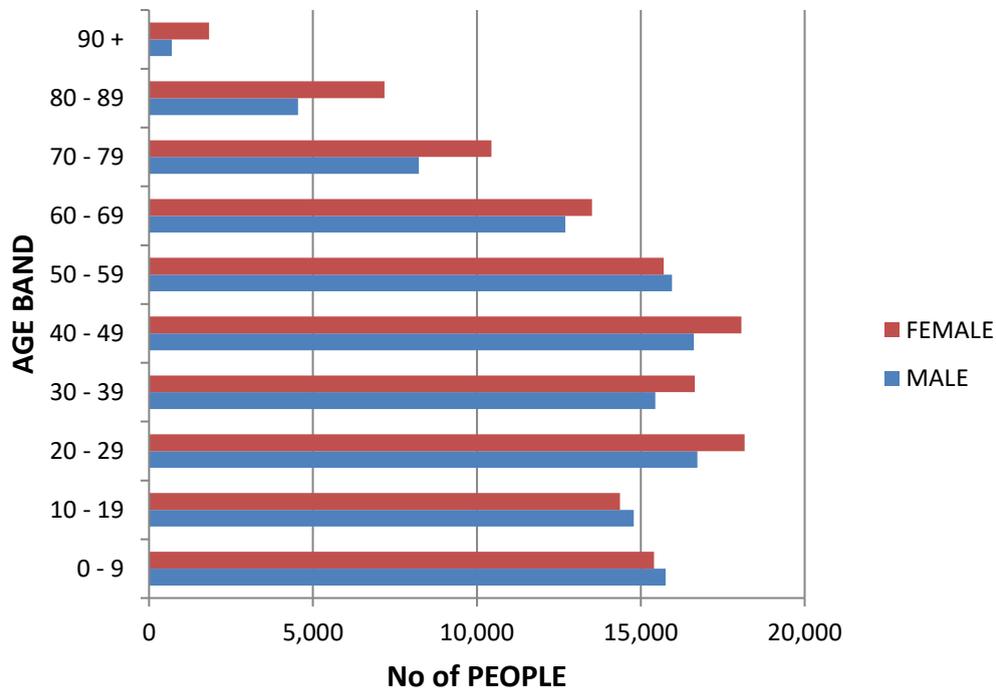
Projecting Older People Population Information: <https://www.poppi.org.uk/index.php>

Projecting Adults Needs and Services Information: <https://www.pansi.org.uk/>

Protected Characteristic - Sex/gender	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input checked="" type="checkbox"/>
Neutral	<input type="checkbox"/>
Negative	<input type="checkbox"/>
<p>Overall impact: Positive</p> <p>This policy changes will be positive for households.</p> <p>The majority of applicants on the housing register are from women headed households, mainly due to the higher levels of poverty in such households. The split in the income thresholds between families and single people will mean that lower paid single women and single parents will not be discriminated against.</p> <p>The increase in priority for households suffering domestic abuse will also have a positive impact on women, who are more likely than men to be the victims of abuse.</p> <p>There is a negative impact of the residency criteria policy that will affect women only headed households who cannot undertake community contributions due to childcare responsibilities.</p>	

Evidence:

HAVERING POPULATION
- BY GENDER AND AGE BAND



Gender	Total	% of Register
Male	402	21
Female	1511	79
Total	1913	100

Sources used:

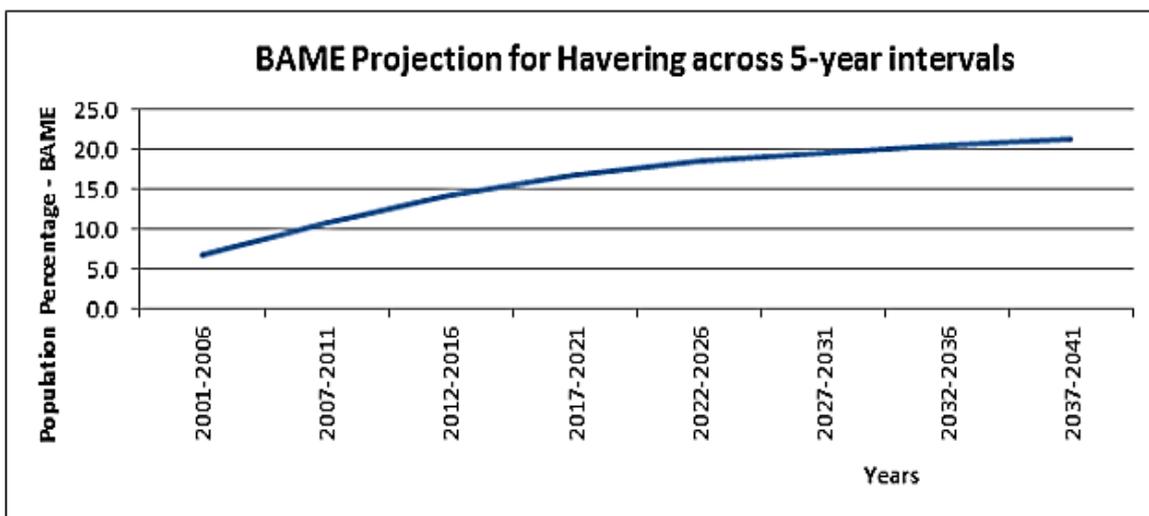
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates>

Protected Characteristic - Ethnicity/race	
Please tick (✓) the relevant box:	
Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>
<p>Overall impact: Neutral</p> <p>This policy offers an ethnicity neutral approach to making decision on the allocation of housing.</p> <p>There are no proposed changes to the residency criteria which may impact in terms of this protected characteristic.</p> <p>We know from the Hillingdon Court of Appeal cases that refugees and travelers fall within this protected characteristic group and that residency requirements can indirectly discriminate against these groups, as by virtue of their circumstances they are less likely to be able to satisfy a residency requirement. For an effective mitigation to be in place we need to show that the mitigations will eliminate or significantly reduce the discrimination. We have therefore introduced mitigations for travelers and refugees.</p> <ul style="list-style-type: none"> • Exception (Travelers & Refugees) – Reducing the residency criteria to 5 years which would reduce the impact of the 6 year residency criteria. Therefore the overall impact would be neutral for applicants of traveller background or refugee status. Single or couple applicants of refugee or traveller backgrounds stand to benefit from a reduction in residency with greater opportunities of success for 1 bed permanent accommodation. Travellers and refugee applicants are very likely to fall within a reasonable preference category, as shown in the analysis below, so will also benefit from that exemption to the residency requirement. Evidence suggests there is very little in the way of housing demand from the travelling community (see below). • Persons who fall within the statutory ‘reasonable preference’ groups: <ul style="list-style-type: none"> - people who are homeless (within the meaning of Part 7); - people who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any such authority under section 192(3); 	

	<ul style="list-style-type: none"> - people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions; - people who need to move on medical or welfare grounds (including any grounds relating to a disability); and - people who need to move to a particular locality in the district of the Council, where failure to meet that need would cause hardship (to themselves or to others). <p>The figures for the refugee applicants below shows that all those who have applied were homeless applicants and placed in the RP band, which reduced their chances of being rehoused. Under the changes being made in the proposed Scheme there is a mitigation that those falling within a reasonable preference group, which includes homeless households, will have access to the Scheme. As such homeless households will be placed in the Band 2c if they have a community contribution, and Band C if they don't. Any medical needs or other relevant factors will also be taken into account in accordance with the Scheme, and banding accordingly allocated as for all applicants with access to the Scheme. This will therefore improve their chances of being housed.</p>
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Evidence:

- Havering is one of the most ethnically homogenous boroughs in London, with 83% of its residents recorded as 'White British' in the 2011 census; higher than both London and England.
- However, the ethnically homogenous characteristic of Havering is gradually changing due to its growing cultural diversity.
- The Borough's white population is projected to decrease from the current 84% to 78% in 2032.
- The BAME population, notably those from Black African heritage (though many of whom are likely to be British born) is projected to increase from 4.1% in 2017 to 5.3% of the Havering population in 2032



According to the GLA ethnic projections (2020) There are approximately 40,500 (18%) people from BAME groups living in Havering, the majority being black Africans (11,700, 4.5%).

Table 1: The GLA ethnic population projections 2020

Ethnic Group	Male	Female	Persons
White British	94,850	101,950	196,810
White Irish	1,320	1,620	2,940
Other White	7,280	7,330	14,610
White & Black Caribbean	1,900	1,840	3,740
White & Black African	710	780	1,490
White & Asian	890	860	1,750
Other Mixed	900	920	1,820
Indian	4,050	4,530	8,590
Pakistani	1,290	1,510	2,810
Bangladeshi	1,190	1,140	2,340
Chinese	610	1,010	1,620
Other Asian	1,980	2,120	4,110
Black African	5,270	6,430	11,700
Black Caribbean	2,090	1,940	4,030
Other Black	790	970	1,760
Arab	290	220	510
Other Ethnic Group	660	570	1,220
Total	126,070	135,740	261,850

Table 2: Housing Register by Ethnicity

Racial Classification		Housing Register	
Race	Ethnicity	Total	% of register
White	British	1273	67
	Irish	17	1
	Other	88	5
BAME	Arab	2	0
	Asian Bengali	20	1
	Asian Indian	12	1
	Asian Other	27	1
	Asian Pakistani	13	1
	Black African	186	10
	Black Caribbean	47	2
	Black Other	18	1
	White & Asian	7	0
	White & Black African	28	1
	White & Black Caribbean	31	2
	Other Mixed	16	1
	Other	2	0
No response	Blank/Refused	126	6
		1913	100

2.3.2 (j) Exception (Travelers/Refugees) - From data sourced from P1E records, shows the number of accepted homeless cases under Part 7 between 2016-18 for travelers were as follows:

Table 3: Accepted homeless cases for applicants of traveler/gypsy background 2016-18

Year	Total
2016	0
2017	0
2018	0

For the year 19/20 data sourced from HCLIC showed there were five known traveler cases investigated under part 7 with one case accepted under s.193 main duty. Accepted applications to the housing register did not fare better for applications from travelers, with one application made in 2019 and zero acceptances to the register between 2016 and year-end 2020. This appears to suggest there is very little housing demand from the travelling community.

Table 4: Accepted applicants from traveler/Gypsy community to the housing register

Year	Status	Homeless	Residency Met?	Banding	Year Residency Met	New Band	Bed Need	Rehoused
2019	Traveler	Yes	No	RP	-	-	1	No

Opportunities for non-UK residents/asylum seekers appear to be relatively neutral to positive dependent on bedroom size required. Data obtained shows that between 2016-20 eight households were granted homeless decisions under s.193 of HA96. Of these eight households five went on to apply and become accepted on the housing register.

The below data shows the pathway of accepted Non-UK national applicants to the register, with the remaining three cases provided with alternative housing solutions such as discharge into private sector accommodation.

Table 5: Accepted Non-UK nationals/Refugees to the housing register

Year	Status	Homeless	Residency Met?	Banding	Year Residency Met	New Band	Bed Need	Rehoused
2016	Refugee	Yes	No	RP	2020	CC2	4	No
2018	Refugee	Yes	No	RP	-	-	1	Yes
2018	Refugee	Yes	No	RP	-	-	2	No
2018	Refugee	Yes	No	RP	-	-	4	No
2019	Refugee	Yes	No	RP	-	-	3	No
2019	Refugee	Yes	No	RP	-	-	2	No
2019	Refugee	Yes	No	RP	-	-	3	No
2019	Refugee	Yes	No	RP	-	-	3	No

For context, the only Non-UK national currently on the list with a higher priority banding resulting from RP banding (residency criterion) is currently in CC2 band with an effective date of 22 September 2020. For the purpose of context, an analysis of the number of properties the applicant would have been successful for based on lowered exception criteria by years is documented below:

Table 6: Prospective accommodation offer for eligible Non-UK national/refugee applicant

CC2 Band (having fulfilled residency criterion from RP Banding)		
Effective Date	Bedroom Eligibility	Potential Successful bids based on effective date
22/09/15 (5 year residency)	Four bedroom	13
22/09/18 (4 year residency)	Four bedroom	8
22/09/17 (3 year residency)	Four bedroom	8
22/09/18 (2 year residency)	Four bedroom	4
22/09/19 (1 year residency)*	Four bedroom	3
Total		32

Based on the data, there appears to be a sizeable impact to the applicant starting from RP band, who based on the five-year wait to achieve banding status would have missed out on 32 four bedroom properties to applicants in higher banding. This differs from a qualifying applicant as homeless who met initial residency placed under Homeseeker (H) band and subsequently qualified for CC2 under similar circumstances.

If expected waiting times are applied based on banding effective date stretching back five years (22/09/15) the results would show as follows:

Table 7: Waiting based on earlier effective date (2015)

Banding	Bedroom Need	Waiting Time (in Band – with residency served - no RP)	Total waiting time (with accrued RP years)
ER	Four bedroom	1 month	5 years
CC1	Four bedroom	1-6 months	5.5 years
CC2	Four bedroom	1-2 years	6-8 years
H	Four bedroom	3-7 years	8-12 years

From the above table there is a visible distinction in the prospective waiting times based on the above applicants placement in CC2 with an earlier effective date. With the current effective date (22/09/20) applied the waiting times would vary considerably:

Table 8: Waiting times based on current effective date (2020)

Banding	Bedroom Need	Waiting Time (in Band – with residency served – no RP)	Total waiting time (with accrued RP years)
ER	Four bedroom	6 months	5.5 years
CC1	Four bedroom	2-3 years	7-8 years
CC2	Four bedroom	3-5 years	8-10 years
H	Four bedroom	4-7 years	9-12 years

Figures published by the MHCLG show:

- in London, Black Caribbean households were over-represented in new social housing lettings (accounting for 11.2% of new lettings, compared with 4.3% of the population), as were Black African households (15.2% of lettings, compared with 6.6% of the population)

- in London, White British households were under-represented in new social housing lettings (accounting for 37.0% of new lettings, compared with 45.4% of the population), as were Other White households (7.5% of lettings, compared with 13.2% of the population) and Asian Indian households (2.0% of lettings, compared with 6.9% of the population). This reflects the higher levels of poverty and housing needs amongst BAME populations.

The table below shows the lettings to BAME and non-BAME communities in Havering in 2016 compared to the national average (England). This is the latest year that figures are available.

Table 9. Social Housing Letting 2016/17

	White			Other than White		
	%	Social housing lettings	Population estimate (2016)	%	Social housing lettings	Population estimate (2016) %
Havering	83.7	518	88.3	16.3	101	11.7
Average England	87.4	783	89.8	12.6	152	10.2
Average London	49.1	424	62.1	50.9	492	37.9

<https://www.ethnicity-facts-figures.service.gov.uk/housing/social-housing/new-social-housing-lettings/latest>

This shows that under the current policy non-white households accounted for 16.3% of the social housing lettings in Havering (compared to 50% in London and 12.6% nationally). Non-white households however made up 11.7% of the Havering population (compared to 37.9% in London and 10.2% nationally). In Havering 21% of applicants on the housing register are from non-white ethnicity (see Table 2) however they only received 16.3% of lettings.

The impact of the mitigations will be measured against the current figures:

- Currently only 62 applicants out of 1896 (3%) on the housing register are accepted under reasonable preference as homeless despite not having 6 years residency.
- 34 applicants out of above 62 (55%) identified are from within non-White British households
- 34 out of 1896 amounts to 2% accepted onto register as exceptions under reasonable preference.

Protected Characteristic - Religion/faith		
<i>Please tick (✓) the relevant box:</i>	Overall impact: Neutral	
Positive	This policy offers a religion/faith neutral approach to making decision on the allocation of housing. The Policy will be carried out with an emphasis on equality of treatment.	
Neutral		
Negative		
Evidence:		
Most recent available data (Census 2011) shows the majority of Havering residents are Christians.		
Table 7: Religion and Belief 2011 Census, Havering		
Faith	Number	%
Christian	155,597	65.6%
Buddhist	760	0.3%
Hindu	2,963	1.2%

Jewish	1,159	0.5%
Muslim	4,829	2.0%
Sikh	1,928	0.8%
Other Religion	648	0.3%
No Religion	53,549	22.6%
No Response	15,799	6.7%
Totals	237,232	100%

Sources used:

Census 2011

Protected Characteristic - Sexual orientation

Please tick (✓) the relevant box:

Overall impact: Neutral

Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>

This policy offers a sexual orientation neutral approach to making decision on the allocation of housing. The Policy will be carried out with an emphasis on equality of treatment.

It is not necessary for residents to disclose their sexual orientation therefore a neutral impact is expected.

Sources used:

There is insufficient evidential information at this time as to whether the impact on this protected characteristic will be positive or negative. It is currently envisaged that there will be neutral impact at the least.

Protected Characteristic - Gender reassignment

Please tick (✓) the relevant box:

Overall impact: Neutral

Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>

This policy offers a gender reassignment neutral approach to making decision on the allocation of housing. The Policy will be carried out with an emphasis on equality of treatment.

Evidence:

The Equality Act 2010 says employees must not be discriminated against in employment for being married or in a civil partnership.

In the Equality Act marriage and civil partnership means someone who is legally married or in a civil partnership. Marriage can either be between a man and a woman, or between partners of the same sex. Civil partnership is between partners of the same sex.

Marriages and registration of civil partnerships in the UK are currently suspended due to the COVID-19 pandemic.

Sources used:

<https://www.equalityhumanrights.com/en/advice-and-guidance/marriage-and-civil-partnership-discrimination>

Protected Characteristic - Marriage/civil partnership

Please tick (✓) the relevant box:

Overall impact: Neutral**Positive**

This policy offers a marriage/civil partnership neutral approach to making decision on the allocation of housing. The Policy will be carried out with an emphasis on equality of treatment. The policy will support households regardless of their marital status

Neutral**Negative**

Evidence: There is insufficient evidential information at this time as to whether the impact on this protected characteristic will be positive or negative. It is currently envisaged that there will be neutral impact at the least.

Protected Characteristic - Pregnancy, maternity and paternity

Please tick (✓) the relevant box:

Overall impact: Neutral**Positive**

This policy offers a pregnancy, maternity and paternity neutral approach to making decision on the allocation of housing. The Policy will be carried out with an emphasis on equality of treatment.

Neutral**Negative**

Evidence: There is insufficient evidential information at this time as to whether the impact on this protected characteristic will be positive or negative. It is currently envisaged that there will be neutral impact at the least. The changes proposed in the new policy will not impact this group.

Health & Wellbeing

Please tick (✓) all the relevant boxes that apply:

Overall impact: Neutral**Positive**

Do you consider that a more in-depth HIA is required as a result of this brief assessment? No ✓

Neutral

The process of reviewing this policy will assist the Council in ensuring that accommodation occupied by the tenants meets their housing needs. Housing plays a key role in the health and well-being of residents. Overcrowding of accommodation can lead to health issues and family disputes. Evidence detailed below demonstrates that this is a real problem in Havering. The review process will identify and enable the Council to allocate social housing to those in the greatest need.

Negative

Where resources permit, and eligibility for social housing remains, the Council will look to housing tenants in accommodation that meets the

tenants needs, either in council stock or through the use of reciprocal and nomination agreements with registered providers with whom the Council works in partnership.

Similarly, reviews of this policy will also indicate in terms of disability where the tenant's current home is no longer suitable – either where the tenant or a member of their household no longer has a need for a specifically adapted property or where the review identifies that the tenant has a need for an adaptation to their home.

Again, where resources permit, the Council will seek to allocate more suitable accommodation for the tenant or will assist the tenant to obtain a disabled facilities grant to adapt the home.

Evidence:

The table below shows the identified size mix for affordable housing in Havering using both the 2014 and 2015 round GLA long-term trend migration figures for comparison purposes. (*Affordable housing is considered to be housing of any tenure which is judged to be affordable to a particular group or household by analysis of housing costs, income levels and other factors*).

This takes account of both overcrowded households who require a move to a larger dwelling and also under-occupying households who require downsizing.

Fully objectively assessed housing need for Havering for affordable homes 2011 -2033

	GLA 2014	GLA 2015
1 bedroom	900	640
2 bedrooms	2,400	2,850
3 bedrooms	4,100	5,400
4 bedrooms	700	1,610
5 bedrooms	100	20
Total affordable housing	8,200	10,520
TOTAL	25,200	30,050

For both the 2014 and 2015 round data, the evidence points to a high need for three bedroom properties in the affordable housing sector. The main driver of this need in the affordable sector is the need to address overcrowded households in Havering who require larger affordable housing.

Affordable Housing in Havering

The review of this policy will assist the Council in identifying where downsizing may be appropriate to certain households and these properties can be placed back in to the churn of much needed council stock.

		Sources used: Outer North East London Strategic Housing Market Assessment for Havering – November 2016, by Opinion Research Services

Review

This EqHIA will be reviewed annually, or as and when new legislation or relevant influential data that may impact on the EqHIA arrives.

Scheduled date of review: October, 2022

Lead Officer conducting the review: Darren Alexander, Assistant Director Housing Demand.

1. Action Plan

The real value of completing an EqHIA comes from the identifying the actions that can be taken to eliminate/minimise negative impacts and enhance/optimize positive impacts. In this section you should list the specific actions that set out how you will address any negative equality and health & wellbeing impacts you have identified in this assessment. Please ensure that your action plan is: more than just a list of proposals and good intentions; sets ambitious yet achievable outcomes and timescales; and is clear about resource implications.

Protected characteristic / health & wellbeing impact	Identified Negative or Positive impact	Recommended actions to mitigate Negative impact* or further promote Positive impact	Outcomes and monitoring**	Timescale	Lead officer
Race/ethnicity	Residency criteria will impact predominantly BAME communities.	Mitigations have been added to the policy for refugees, traveler communities and homeless households.	The impact of the policy on these groups will be monitored.	Annually	Kwabena Obiri

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Add further rows as necessary

* You should include details of any future consultations and any actions to be undertaken to mitigate negative impacts

** Monitoring: You should state how the impact (positive or negative) will be monitored; what outcome measures will be used; the known (or likely) data source for outcome measurements; how regularly it will be monitored; and who will be monitoring it (if this is different from the lead officer).

Review

Scheduled date of review: October 2022

Lead Officer conducting the review: Kwabena Obiri

Please submit the completed form via e-mail to EgHIA@haverling.gov.uk thank you.



CABINET	20th October 2021
Subject Heading:	Housing Asset Management Strategy
Cabinet Member:	Cllr Joshua Chapman, Cabinet Member for Housing
SLT Lead:	Patrick Odling-Smee. Director of Housing
Report Author and contact details:	Garry Knights, Assistant Director of Housing Property Services 01708 432834 Garry.knights@havering.gov.uk
Policy context:	LBH Corporate Plan HRA Business Plan
Financial summary:	The Housing Asset Management Strategy is the key document which will determine our long term approach to investing in our housing assets. It will therefore have a significant influence on the HRA Business plan and long term expenditure on our homes
Is this a Key Decision?	Yes, significant effect on two or more wards
When should this matter be reviewed?	October 2022
Reviewing OSC:	Towns and Communities OSC

The subject matter of this report deals with the following Council Objectives

Communities making Havering	[x]
Places making Havering	[x]

Cabinet, 20th October 2021

Opportunities making Havering
Connections making Havering

[x]
[]

SUMMARY

Havering Council owns and manages circa 11,200 properties (9,200 tenanted and 2,000 leasehold), including 10 tower blocks and around 1,000 medium and low rise blocks.

The high level objectives for our housing assets should be to;

- provide the best quality, safest and cost effective home for our residents which meet their needs
- maximise the value of the assets and ensure a positive impact on the HRA business plan
- address the social impacts housing can have on individuals and communities through investments in estates and environment
- meet the council's zero carbon objectives

In order to achieve this we have developed a new strategy, to replace the previous 5 year strategy adopted in 2016, which sets out our keys aims and action plan to deliver them effectively.

This report outlines the new proposed strategy and the full strategy is attached in appendix 1.

RECOMMENDATIONS

That Cabinet;

1. Adopt the Housing Asset Management Strategy and the associated action plan as set out in Appendix 1.

REPORT DETAIL

Havering Council owns and manages a diverse housing portfolio across a relatively large geographical footprint, when compared to other London boroughs. To effectively manage these properties we have developed a new Housing Asset Management Strategy (AMS) which sets out the context in which we operate, the current performance of our properties, the upcoming changes in the housing sector which we need to address, and the approaches to how we meet these challenges.

It is essential that the council has a clear strategic approach which is based around a thorough understanding of the assets and which continually assesses the most appropriate and affordable options to stock investment.

This has become even more relevant over the last few years, as emerging agendas of building safety, zero carbon, decent homes 2 and regeneration targets have put increased pressure on the HRA business plan.

In addition the Regulator for Social Housing has increased powers to ensure registered providers, such as the council, effectively manage their housing stock in line with the consumer standards and engage fully with residents in this process.

The council's previous 5 year AMS was adopted in June 2016 and given these changing agendas a new approach is now required.

In order to develop the new strategy a number of steps were undertaken to provide sufficient context in which to determine the appropriate approaches;

- Undertook a 25% stock condition survey and EPCs across circa 3000 homes
- Developed a new 30 year asset plan which was incorporated into the HRA business plan and adjusted to ensure the financial measures (IC) are met
- Developed a new asset assessment model based on financial (NPV) and social criteria to assess the stock
- Developed a zero carbon model to understand the requirements and costs involved in de-carbonising our housing stock.

The AMS includes a number of core objectives which will be delivered through the detailed action plan;

- Invest in our homes so they are well maintained, warm, safe and attractive to residents
- Contribute to delivery of the Council's carbon reduction plans, all housing stock to have an EPC band C by 2030 and carbon neutral by 2040
- Provide a social housing stock that matches future demographic and social needs in balanced communities
- To reduce inequality by providing homes and services that meet needs of diverse communities
- Ensure we derive good value for money from our housing and non-residential stock
- Contribute to an overall increase in the number of properties available to rent
- Ensure we meet our legal and contractual obligations as a social landlord
- Make decisions based on quality information about our assets and our customers
- Ensure our asset management strategy is affordable within the business plan
- To place residents are at the heart of our decision making and influencing the delivery and monitoring of all services.

The new AMS will ensure that we gather sufficient data on a regular basis to make informed decisions through a regular stock condition approaches. A cyclical 5-year stock condition approach will be implemented and option appraisals will be triggered using this information for;

- Stock with a negative NPV
- Stock with a marginal NPV (below £5,000)
- High market value/poor performing stock where there may be opportunities to release value to contribute to our development programme
- Stock where cost to bring to EPC C/zero carbon is prohibitive.

Appraisals will be a two staged approach which:

1. Will explore the reasons for poor NPV, and to understand how the delivery of our social objectives can be improved. We will carry out a high-level assessment of opportunities for improvement. We will then identify the available options to be appraised based on the location, property type and current occupancy and conclude with a high-level view on the solutions which merit more detailed appraisal.
2. Will be an in-depth appraisal of the identified options, including estate regeneration for identified estates or stock types alongside other options including tenure conversion and disposal where these fit with our social objectives and deliver the best outcomes for our business plan and our residents.

The strategy commits us to building on the work to date to understand our zero carbon position, by developing a full road map to achieve the Council's 2040 zero-carbon commitment and includes this in the HRA business plan.

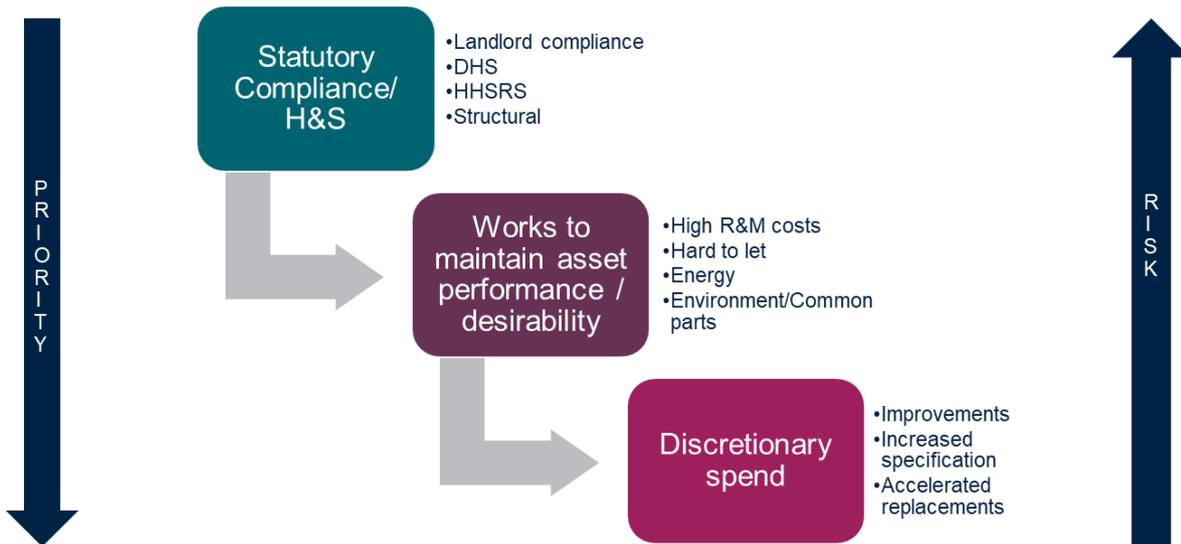
The strategy put residents safety as a paramount priority and makes it clear that we will prioritise spend in these areas ahead of other areas.

The recent government White Paper, the Charter for Social Housing Residents, made it clear that communication and engagement with resident has to improve significantly and we have therefore committed to a wider engagement strategy through resident boards and peer groups who will help us deliver and evolve the AMS.

The AMS will also support the delivery of new homes, by undertaking proactive assessments of our existing stock based on current financial and social performance, which will determine the best investments approaches, whether that be through planned programmes of works, regeneration or possibly stock disposal.

The strategy will be key to ensuring we have a robust HRA business plan, which is fully costed for works to all assets across all necessary areas and allows us to identify additional capacity for growth. The asset plans which flow from this strategy will feed into the HRA business planning activities due in October.

The strategy proposes to adopt the investment priorities approach for our existing stock as detailed below



The strategy also embeds value for money principles, through longer term procurement, approaches which move responsive works to more planned approaches and through the grouping of works whilst at a property (being mindful that we do not undertake works too early), which is especially relevant in blocks. This will maximise our investment capacity but also be efficient for leaseholders.

The AMS also includes a clear governance structure and a range of performance measure against which to measure progress and success;

- Overall growth in NPV above forecast
- Option appraisals within 24 months for all properties which meet the triggers established
- To have no properties with an EPC rating below C by 2030 with alternative options explored where this is not feasible
- Maintain decent homes standard including adopting any new guidance issued
- Adherence to planned works budget and timescales
- Compliance with all health and safety, regulatory and statutory standards
- Top quartile resident satisfaction.

REASONS AND OPTIONS

Reasons for the decision:

It is essential that Registered Providers can demonstrate a strategic approach to managing their properties and how they will meet the Regulator for Social Housings consumer standards. A fully developed and implemented AMS is therefore essential to meet this obligation.

The HRA assets also represents a significant financial value to LBH and it is important that we protect and grow the value of those assets, the AMS is the key document which helps determine how we achieve this.

Consultation:

The resident engagement panel, which included both tenants and leaseholders, has been consulted as part of the development of the strategy. The Cabinet Member for Housing has been consulted on this strategy and relevant changes incorporated.

Other options considered:

To continue with the previous AMS.

This was rejected because the previous strategy did not reflect on the new changing agendas and legislative changes and therefore no longer reflected our duties as a landlord and property owner.

IMPLICATIONS AND RISKS

Financial implications and risks:

The financial impact of adopting the Housing Strategy is likely to have Revenue and Capital, costs and income implications. The implementation of the various elements of the strategy will be subject to the availability of funding and further reports to the Cabinet.

Although provisional funding for the priorities is available in the latest HRA Business Plan, delivery of the strategy will be extremely challenging in the current economic climate and all provisional funding will be subject to annual review.

The costs of preparation of the Housing Asset Management Strategy and its constituent elements are being met from within existing revenue resources.

It is important to reflect that data provided in the Asset management strategy is current and relevant changes will be reflected in the annual review of the HRA business plan.

Legal implications and risks:

The Council has a statutory duty under Section 8 of the Housing Act 1985 to consider housing conditions in its district and the needs of the district with respect to the provision of housing accommodation.

The regulator of social housing derives its powers from the Housing and Regeneration Act 2008 and its stated objectives are to undertake economic regulation of providers of social housing, focusing on governance, financial viability, and value for money. As identified in this report, the White Paper on Social Housing published in November 2020 suggests that the direction of travel is for the regulator to have wider powers in enforcing a revised Consumer Standard and Code of Practice.

The proposed strategy covers those properties which are within the Housing Revenue Account (HRA). There are statutory requirements as to the keeping of a HRA as set out in the Local Government and Housing Act 1989. Section 76 of the Act sets out the duty on the Council to budget to prevent a debit balance on the HRA and to implement and review the budget.

Further, sections 167 to 175 Localism Act 2011 deal with housing finance, and replaced the subsidy system with self-financing arrangements, allowing Councils to implement longer term strategies and plans in respect of the HRA stock.

Stock within the HRA is set out as being predominantly rented as social housing with the Council as landlord, the remainder being leasehold properties. To rented properties under section 11 Landlord and Tenant Act 1985 the Council is under a duty to keep in repair the structure and exterior, provision for sanitation and heating. Amendments made to that Act by the Homes (Fitness for Habitation) Act 2018 have also introduced a requirement for properties to be fit for human habitation. Obligations to leaseholders will depend on the contractual arrangements set out in the Lease, but the Council is likely to retain a responsibility to repair and maintain communal areas and the exterior of the building, including the roof.

The Asset Management Strategy as proposed, is likely to assist the Council in complying with these statutory and regulatory obligations.

Further, the proposed Strategy makes specific reference to the need to address green energy and emissions targets. The Fire Safety Bill as referenced in the proposed Strategy and this paper, is now the Fire Safety Act 2021, having received Royal Assent on 29 April 2021, but is not yet in force. Further, the draft Building Safety Bill was published in July 2020. Flexibility has been built into the draft strategy to be able to respond to any such changes, and there is already a robust compliance process in place as set out in the strategy. If changes are required

then a delegation has been requested both in this report and the draft strategy to be able to make amendments if required during the 5 year period the strategy is intended to run.

Human Resources implications and risks:

There are no direct HR risks identified.

Equalities implications and risks:

An EqHIA has been undertaken (see appendix 2) and the strategy is consider to have a neutral impact on all groups

Health and Wellbeing implications and Risks

Provision of an effective housing asset management service is essential to ensure residents are able to safely and comfortably use their homes, being provided with good quality services which support promote good health and wellbeing

Poor housing has been shown to have serious negative impacts on individual's health and wellbeing and a significant negative impact on communities

The council is responsible for improving and protecting health and wellbeing of local residents under the Health and Social Care Act 2012

This strategy aims at ensuring LBH provide the right homes for our resident which are affordable, safe and of high quality, provide good communities in which to live and work, whilst meeting the challenges of zero carbon and building safety across the estates

The strategy promotes an intelligence led approach to ensuring appropriate decisions are made and that sufficient funding is available in the HRA to meet the challenges.

The strategy will work alongside the Housing Strategy to ensure future demographic changes and social need can be accommodated.

BACKGROUND PAPERS

Appendix 1 - Housing Asset Management Strategy

Appendix 2 - EqHIA

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London Borough of Havering Housing Services Asset Management Strategy 2021-2026



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Introduction



The London Borough of Havering is investing in significantly improving our council housing stock. We are dedicated to the aims and principles of providing high quality social housing for Havering residents.

As a social housing landlord, we manage 9,200 tenanted, and some 2,000 leasehold homes.

Whilst a proportion of council managed homes are flats, there are only 10 ‘high-rise’ blocks, 510 medium-rise and 592 low-rise blocks.

Many of our council managed homes are houses and we have a wide variety of non-traditional construction types across the borough.

These homes and estates are the bedrock of our communities and it is our responsibility to manage and maintain these homes on behalf of our residents for future generations.

Of course there are challenges. In today’s housing climate, we have an more pressure on our budget to carry out many building and maintenance projects on an ageing, diverse housing stock.

Therefore, it is essential for us to make the best use of our financial resources to improve existing homes and make best use of our current housing stock.

The rent we receive is held in the Housing Revenue Account (HRA) and this account is ring fenced, by law, to be spent on managing and providing council housing.

It is vital that we have a sound, comprehensive strategy for the management of our assets and plans for future investment.

The Council recognises that there is a need for high quality, affordable homes, especially for vulnerable residents, those on low incomes, and for first time owners, (via shared ownership schemes). Therefore, in this strategy we have set out our ambition for how we will meet these housing needs by using resources generated through the HRA Business Plan.

We will prioritise our investment approaches, ensuring our buildings are safe, meet our statutory and regulatory duties as a landlord and improve the estates and areas in which our residents live.

Running alongside these priorities is our zero carbon objective by 2040, and we will build measures to achieve this into all programmes and approaches touched on in this strategy.

In this strategy, we recognise the importance of sound asset management principles and applying these to our approach to investment. This document is designed as a robust, evidenced-based asset management strategy to lead and inform our business decisions.

Its foundations are rooted in the work we have undertaken to improve our understanding of our properties, and this strategy seeks to drive forward work to deliver value for money for the Council and its current and future residents. It is supported by a live action plan that we will use to direct and monitor activity over the next 5 years. This strategy will be reviewed annually and after 5 years, in line with the business plan.

Introduction

1.1 Aim of this strategy

The Asset Management strategy will contribute to the delivery of our business plan. It structures our ability to deliver three core components of effective asset management:

- Investment in the long-term sustainability of assets – how we keep properties at our agreed investment standard for the life of the business plan.
- Active Asset Management – the practice of taking decisions about on-going ownership and investment in individual properties and estates based on the understanding of their performance on a social, economic and environmental basis.
- Support for wider corporate objectives – consideration of where and how the management of our assets contributes to the delivery of the Council's wider strategic aims, including helping communities and creating great places to live.

1.2 - Scope of this strategy

This strategy sets out the London Borough of Havering's approach to the management of assets within its Housing Revenue Account (HRA).

It includes social rented and leasehold homes, as well as garages. This also includes assets managed by our Tenant Management Organisations (TMOs) for which we retain the responsibility for compliance, safety and performance.

Some blocks have shops underneath and some of our services are delivered from local offices. A clear strategy for these commercial premises needs to be developed in line with our approach to the nearby homes.

This is a high-level strategy for asset management, with the implementation supported by supplementary operational plans and policies.

1.3 - Delegated authority to make minor changes to this strategy

The Assistant Director of Property Services, in consultation with the Director of Housing, will be able to approve minor amendments that do not significantly change this policy or associated procedures.

1.4 - Data Protection

Havering Council takes personal privacy very seriously. Any personal information provided will be kept confidential and never shared without the individual's prior knowledge and consent, unless required to do so by law.



For full details about how the Council protects personal data, please visit [Havering Council Data Protection policy](#).

2. Background

There have been numerous national and local changes in recent years, of which this strategy outlines some of the key aspects affecting asset management.

2.1 - National Context

National priorities for housing are primarily focused around safety of existing buildings, and on the new supply of affordable housing.

'A New Deal for Social Housing', the 2018 housing green paper; and 'Fixing Our Broken Housing Market', the 2017 white paper, articulated the main areas of national housing policy focus. This has been followed by a social housing white paper 'The Charter for Social Housing Residents' published in November 2020.

The white paper strengthens the role of consumer regulation and seeks to strengthen the voice of customers in housing service delivery. It also promises a review of the 'Decent Homes Standard', which is expected to place a greater focus on investment and improvement of external and communal areas, thermal efficiency and building safety.

We wholeheartedly support these areas of focus and this asset management strategy sets out how we will ensure our investment meets residents' priorities, and that we operate with transparency and accountability.

The focus on data and safety has arguably never been higher. In March 2020, the 'Fire Safety Bill' clarified the responsibilities of landlords to manage and reduce the risk of fire.

The 2020 draft 'Building Safety Bill' sets out proposals for new building standards and regulations that will apply to new and existing homes. The Bill focuses landlords' attention on checking the accuracy of data held on assets and ensuring health and safety risks are properly managed. The Bill proposes new requirements for building safety management and greater involvement of residents.

The Regulator of Social Housing (RSH), has recently reminded local authority housing providers that their 'Home Standard' must be met and the white paper proposes increased oversight from the regulator.

The oversight will focus on the role of co-regulation to strengthen customer accountability, and the importance of good quality data to enable all social landlords to prove compliance.

The 'Equality Act' 2010 has brought together over 100 separate anti-discrimination measures including race, gender, disability, religious belief, sexual orientation, age and equal pay.



The Act requires us to have regard to reducing socioeconomic inequalities when we make strategic decisions. A full equalities impact assessment has been completed to support this strategy. This will be continuously reviewed to ensure that our asset management decisions minimise any possible negative impacts on diverse groups.

Energy efficiency, and readiness for changing environmental technologies, have also become more prevalent. The 'Climate Change Act' 2008 (2050 Target Amendment), Order 2019 was adopted in June 2019, and makes a statutory obligation of the net-zero emissions target by 2050 as recommended by the Committee on Climate Change.

Havering Council has signed up to the Amazon Climate Pledge making 'a commitment to be net-zero carbon by 2040

2. Background



2.2 - Local context

As a London borough, we operate in an area of very high housing demand.

This means we need to maintain a strong focus on housing affordability and availability. We are under particular pressure to assist those who find themselves homeless, and therefore, new supply, and making

existing housing supply available to let as soon as possible, are two key priorities for us.

We currently lose around 65 properties a year through right-to-buy and expect to lose 16.5% of our stock over our 30-year business plan period. To balance this, we have significant programmes of regeneration, new development, and acquisition, all funded through the HRA.

We have reviewed the financial capacity within our HRA to ensure viability. This will help with investment planning and scoping our asset management options as we implement this strategy.

The need for resources for new build and regeneration should be balanced by resources for investment in

our existing stock. We face significant investment requirements to ensure our buildings are safe from fire

and other risks. We also need to consider the need for improvements in energy efficiency and reduction in carbon emissions.

The Leader of Havering Council has published our commitment to be net-zero carbon by 2040.

In housing, we can play a big role in helping to achieve this target.

In 2020, we have faced restrictions on how we deliver asset management due to COVID-19. We are pleased to say that services have largely continued. Nevertheless we will see some short-term changes to our maintenance programmes.

We are considering the longer-term impact and the effect on procurement routes should further COVID-19 related issues arise. However, our asset management principles remain the same and are reflected in this strategy.

3. Asset Management: principles and objectives



The Council’s Corporate Plan (2019) articulates our vision and priorities that will underpin all of the Council’s activities, which naturally impact on the management of the Council’s housing stock.

Our vision is for a ‘Cleaner, Safer, Prouder, Together’ borough.

Some of the factors that will enable us to achieve this are: -

- **Community**

Working as a team with our community to tackle local challenges and improve health, wellbeing and experience in our neighbourhoods.

- **Technology**

Making better use of technology to make life easier for our residents and to provide value for money in all services.

- **Better use of assets**

Optimising the use of council assets to improve the customer experience, increase income and reduce cost.

- **Commercialisation**

Developing a more commercial approach to the way that we deliver public services by understanding the true costs of delivering services, which will lead to more efficient procurement and contract control.

Our core objective is to ensure the long-term viability of a stock base that matches the current and future needs of local residents. Principles for asset management are to: -

- Invest in our homes so they are well maintained, warm, safe and attractive to residents

- Contribute to delivery of the Council’s carbon neutral plans

- Provide social housing stock that matches future demographic and social needs in balanced communities

- Reduce inequality by providing homes and services that meet needs of diverse communities, including a focus on property accessibility

- Ensure we derive good value for money from our housing and non-residential stock

- Contribute to an overall increase in the number of properties available to rent (sub-market)

- Ensure we meet our legal and contractual obligations as a social landlord

- Make decisions based on quality information about our assets and our customers

- Ensure our asset management strategy is affordable within the business plan

- Place residents at the heart of our decision-making and able to influence the delivery and monitoring of all services.

4. Planning requirements and tools



We have a range of tools to assist in the process of delivering this strategy. Central to effective asset management is the collation and use of robust and integrated management information to enable effective planning.

The new strategy relies on information in the following areas that will need to be regularly updated to ensure it is fit for purpose, which will be maintained with an asset management database:

4.1 - Stock condition data

We recently commissioned Savills, an independent body, to carry out a stock condition survey of 25% of our stock alongside a Reduced Data Standard Assessment

Procedure (RdSAP) energy assessment. We will roll out an on-going stock condition survey programme with the aim to provide 100% coverage within five years, including both internal and external surveys.

This will require support from external consultants providing regular external validation of stock data and works required. This will enable us to build up a comprehensive asset register of all stock owned.

This will not only focus on homes, but all assets owned by the HRA, whether managed by housing or otherwise, to ensure we understand our opportunities, risks and costs in the short, medium and long term.

4.2 - Data and governance to support compliance

In order to be fully compliant in relation to the health and safety of our properties we need arrangements in place which clearly set out our responsibilities across the major areas of fire, gas, water, electrical, asbestos and lifts. We have therefore developed a suite of documents that set out the process to be followed, and how performance is monitored.

4.3 - Asset Performance Evaluation (APE)

We have committed to improving our understanding of the financial and social performance of the residential stock in our Housing Revenue Account (HRA). We have invested in Savills Housing Asset Performance Evaluation (SHAPE) tool which enables us to explore and report on this performance at a granular level.

We use the net present value (NPV) of operating cash flows to evaluate the “worth” of properties to the business plan. We also consider the social value of our homes.

We will use this information to lead informed decisions about where and when to invest in our assets, with a view to improving efficiency as well as quality of experience for our tenants.

4.4 - Skills and expertise

We plan to review our staff structures to ensure the correct resources are in place to deliver the objectives of this strategy.

4.5 - I.T. systems

We are committed to ensuring we have a robust asset management database /system. Currently, the Council uses Keystone which provides a comprehensive service in which we will continue to invest and develop, to provide a reliable source of information.

We want to develop a comprehensive asset register with links to mapping systems and existing management systems (Open Housing and Keystone).

We are also looking to introduce a tool, ‘Twinnedit’ which will allow us to demonstrate our building safety through a robust building safety case file and provide a ‘golden thread’ of information for the new Building Safety Regulator, fire service and other stakeholders.

These are the core tools required so that we can understand our assets, make informed decisions about their future, and deliver the component parts of this strategy.

5. Standards and regulations



As a social landlord we are subject to a range of statutory and regulatory requirements relating to the safety and quality of our properties and how we manage them.

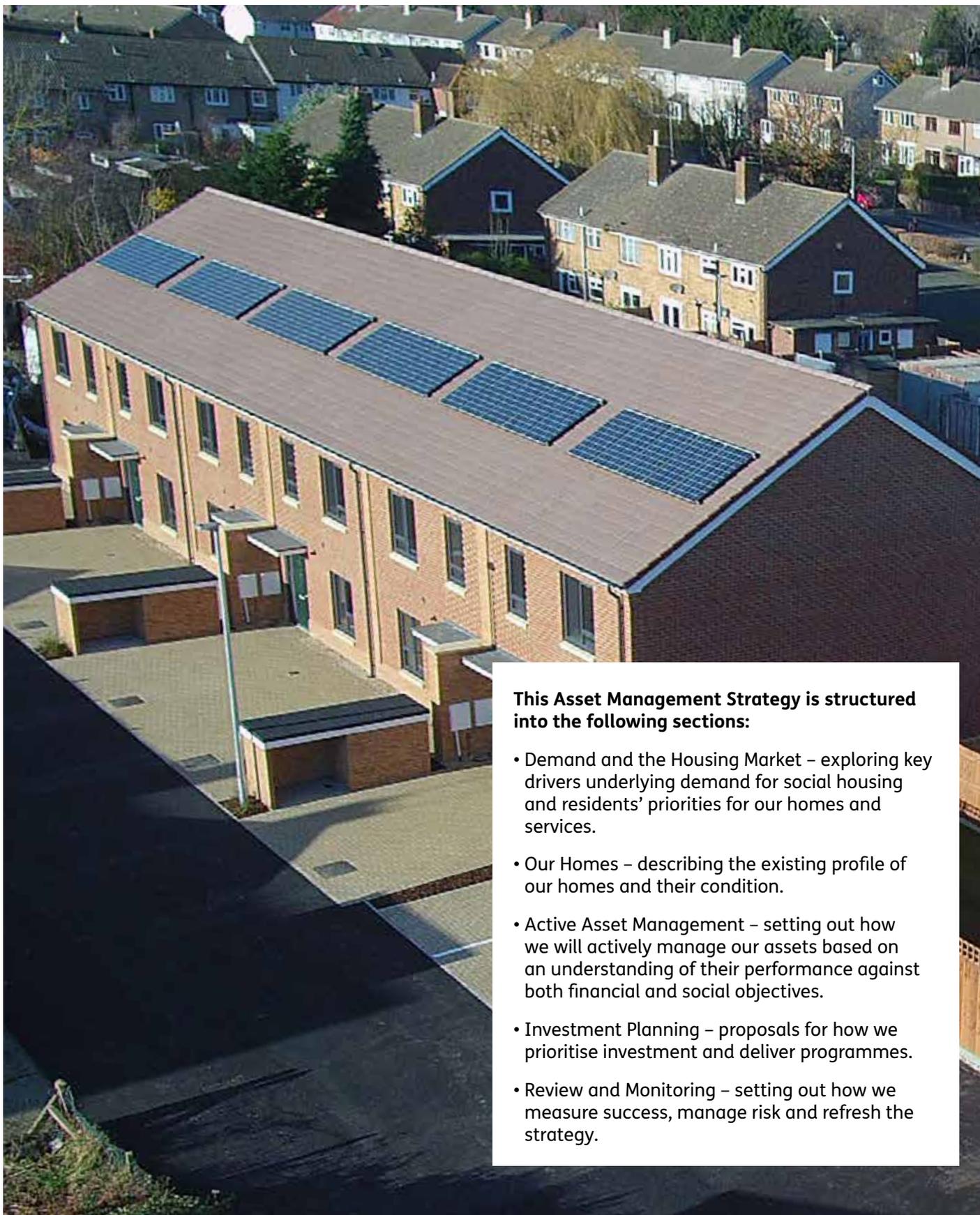
We have written policies that cover compliance, and these set out the specific obligations and how we will meet them.

London Borough of Havering is also subject to the Regulator for Social Housing's 'Consumer Standards', some of which relate to asset management. These

cover : - the *Home Standard*, *Tenancy Standard*, *Neighbourhood and Community Standard*, and the *Tenant Involvement and Empowerment Standard*. In addition, 2019 saw the introduction of the *Rent Standard* to local authorities.

The housing white paper introduces the prospect of proactive inspections with publication of findings to hold us to account for our service delivery and accountability to our residents. This will provide a useful framework for us to demonstrate compliance to the regulator and to residents.

6. Strategy structure



This Asset Management Strategy is structured into the following sections:

- Demand and the Housing Market – exploring key drivers underlying demand for social housing and residents’ priorities for our homes and services.
- Our Homes – describing the existing profile of our homes and their condition.
- Active Asset Management – setting out how we will actively manage our assets based on an understanding of their performance against both financial and social objectives.
- Investment Planning – proposals for how we prioritise investment and deliver programmes.
- Review and Monitoring – setting out how we measure success, manage risk and refresh the strategy.

7.1 Asset Management Strategy – Demand and the Housing market

Key points: Demand and the Housing market

- Although house prices in Havering are lower than in other parts of London, we have a shortage of affordable housing for those in need, with many people on low incomes unable to afford market housing
- Our population is growing. We have a larger than average proportion of householders with elderly occupants. Alongside this we also face demand for home ownership from younger households moving from higher value parts of London
- We need to increase our supply of larger family sized accommodation to meet need (3 and 4 bedrooms)
- We have plans to regenerate 12 of our estates, doubling the number of council properties in addition to an ambitious new build programme
- We are building new specialist provision to assist with homelessness
- Our residents are positive about the quality of their homes and neighbourhoods, but there is more that we need to do to improve overall satisfaction levels and resident engagement.

7.1.1 - Housing market in London Borough of Havering

The Council remains committed to doing everything we can to provide much needed new affordable homes for local people in Havering, and to support vulnerable members of society to have a home that they can be proud to live in. In our area, demand for properties is higher than the supply.

We have included several maps and charts that illustrate the key characteristics of our housing market in this strategy. The key points are summarised below.

The housing market has a bearing on our approach to asset management because it determines need for new homes, the demand for existing homes and the price for any stock sold. House prices in Havering, while lower than London as a whole, are higher than national averages. While we have pockets of high value, the average tends to be around £330,000 to £380,000.

There is a lack of affordable housing priced for those with household incomes of between £15,000 and £50,000 per annum, affecting c.18,200 households in Havering. This indicates a strong need for both more

social housing, and for a sub-market offer to other households who may not qualify for social housing but who cannot access the housing market.

7.1.2 - Housing demand

The population of Havering was estimated to be 260,882 in 2020 with a projected increase to over 285,000 by 2026 – an 8.5% increase. Population estimates in 2019 suggest 18% of Havering's population are aged over 65 compared to a London average of 12.1%. In Havering, 64.7% of households comprise of one family, whilst 29% comprise one person with the remaining 6.3% comprising 'other' households such as those all aged 65 and over, full time students and those with dependent children. There is an influx of younger families moving into the borough from central London locations driven by the relative value for money compared to other London boroughs. This is increasing the pressures on home ownership.

The population of Havering is diverse with 13% from Black, Asian and Minority Ethnic groups with BAME groups representing 19% of applicants on the Council's housing register. We value cultural differences and ensure our housing and facilities meet the needs of different communities as far as possible.

Our asset management challenge is to ensure that the profile of our properties (e.g. size and location) matches what people need. While demand is high across all our stock, we face acute shortages of larger family sized accommodation our research has indicated a far higher ratio of households waiting for larger accommodation (4 bed +) compared with those waiting for one bedroom/bedsit accommodation.

We have recently converted eight of our sheltered schemes operating as bedsits into one and two bedroom properties to meet demand for these property types.

Whilst the supply of Council properties to let has increased from 428 in 2017 to 455 in 2019, the increase has been focussed on smaller property sizes in this strategy. This reflects the lower turnover of larger family homes (2.28% for 3+ bed properties compared with 4.55% for studio/bedsit, 1 and 2 bed properties).

1. Havering Population Projections 2019, source table GLA 2017 – All Ages
2. Havering Data Intelligence Hub – Population estimates
3. Havering Data Intelligence Hub – Household composition
4. ONS Population in England and Wales by ethnic group 2016
5. LBH Allocations Policy Review July 2020

7.1 Asset Management Strategy – Demand and the Housing market



In order to meet demand through our asset management strategy, we will improve re-let times, and continue to explore opportunities for extensions and conversions where feasible. We will also review our acquisition strategy to focus on the size of properties most needed.

We have targets in our Prevention of Homelessness and Rough Sleeping Strategy to encourage under occupiers to free up larger properties and develop our tenant incentive scheme targeted at underoccupiers to enable them to move into home ownership.

Our asset management actions will be linked to our Housing Strategy review. We are looking to create and develop a new Housing Strategy for the borough setting out the major changes in the housing sector, as well as the demographic and economic changes and the impact on our council housing tenants and communities. The housing strategy will set out the strategic aims of housing for the next five year period and beyond, and forms part of a joined up, strategic approach to tackling the housing challenges for all residents of Havering.

The housing strategy will also set out our proposed solutions to what types of housing are genuinely needed in our borough and how new housing relates to infrastructure planning and ‘place-making’, so making that crucial link with social care, healthcare, mental health and wellbeing of those living in our homes.

6. Source Prevention of Homelessness and Rough Sleeping Strategy 2020 - 2025

Our focus in our asset management strategy is to take action to preserve and enhance our housing properties, and to care about those living in our homes and their aspirations for the future.

7.1.3 - Regeneration and development

As part of our response to the need for more affordable housing, we have plans to completely regenerate 12 of our existing council sites. These plans are expected to deliver some 3,500 new homes for local residents over the coming years. We are working with partners to support delivery that will seek to double the amount of Council homes on these estates and more than double the number of affordable homes on these 12 sites .

Our HRA business plan assumes an increase in stock as a result of regeneration of approx. 1,950 rented and over 900 shared ownership properties. It also assumes another approx. 175 additional rented homes through new build and acquisition over the next two years for schemes already identified. As further schemes are identified, these will be included in the plan.

Our asset management team will lead the work to preserve and enhance our existing housing properties.

We expect this to lead to more opportunities for small-scale, place-enhancing regeneration. It will also provide useful information to inform the development of plans for existing projects. We also want to develop a systematic approach to reviewing land and other non-housing assets within the HRA in order to identify opportunities for small-scale regeneration.

7.1 Asset Management Strategy – Demand and the Housing market



7.1.4 - Specialist accommodation strategy

Our Prevention of Homelessness and Rough Sleeping Strategy includes objectives to work with partners to develop a long-term solution for the borough's rough sleepers and to develop a flexible tenure scheme to allow flexibility for those at risk of homelessness.

We are also looking to enhance our cold weather provision. We are phasing out our existing hostel accommodation and replacing it with a high quality welcome and assessment centre for families. As new provision is handed over, our asset management strategy will include plans for the long-term investment in these assets to maintain quality.

We are in the process of developing a Supported Housing Strategy to meet the needs of residents who require assistance in order to support their independence. The strategy covers both HRA and general fund (GF) council assets, however the key investment in supported housing for the HRA are:

- Development of a new welcome centre for homeless families in Harold Hill
- Disposal of two garage sites from the HRA into the GF for the development of supported housing

- Acquisition of properties for the use for single homeless people
- Conversion of selected former sheltered housing, due for regeneration, to be used as supported housing.

We will also explore the options for the development of new supported housing initiatives through the regeneration programme.

Each year, we undertake adaptations to our properties to meet the needs of disabled tenants. There are 134 households on the housing register who need to move on medical or welfare grounds including disability. We have a budget of £850,000 a year for major adaptations to our properties and also to carry out 2-3 extensions each year.

We are keen to build on our work with Adult Social Care to ensure all practical and viable options are explored to meet residents' needs, including helping residents to move when their needs could be better met in a new home. We will ensure our register of adapted properties on our system is up to date and that this data is linked to our 'Open Housing' database to maximise the re-use of adaptations to those with a need at re-letting.

7.1 Asset Management Strategy – Demand and the Housing market

7.1.5. - Resident priorities

We are keen to ensure that we understand the priorities our residents have for their homes, and that we use this information to inform our investment programmes and service delivery. We are therefore focusing on resident engagement. We are also increasing resources for resident communications through work programmes including resident liaison officers and clerks of works.

Our 2020 resident satisfaction survey showed that the aspects that residents were most positive about was that their homes were safe and secure, that rent provided good value for money, satisfaction with the neighbourhood as a place to live and the overall quality of homes. Residents were also pleased with the repairs response during the pandemic.

However overall tenant satisfaction scores have reduced from 79% in 2017 to 73%. Leaseholder satisfaction is lower at 51% compared with 53% in 2017.

Residents were more critical of the extent to which their views were listened to and acted upon, repairs to communal areas, complaints and anti-social behaviour handling. Many of these issues we can address through our asset management strategy.

The residents' priorities identified through the survey focus on repairs and maintenance, anti-social behaviour, value for money and listening to residents' views and acting on them. We are investigating the driving factors and reasons behind these scores to enable us to continuously improve our services.

The global pandemic in 2020 and impact of coronavirus has made engagement with tenant groups more difficult. Going forward we plan to build on engagement with tenants through the Resident Engagement Panel and refine the way in which we work. We will engage with residents on repairs and asset management issues and enable residents to scrutinise our service delivery.

We will develop a regular and systematic approach to gathering and recording resident feedback in future with an aim to carry out a bi-annual satisfaction survey to provide an understanding of our performance against a number of key indicators. We are committed to a regular programme of faster feedback mechanisms (e.g. following repairs).



Key actions: Demand and the Housing market

- We will build a plan to increase the availability of larger family homes through improvements in re-let times, incentives for under-occupiers, conversions/extensions and acquisitions
- We will use our understanding of asset performance to identify additional opportunities for small-scale regeneration alongside a review of land opportunities within our estates and agree a preferred approach/strategy for sites
- We will consult with residents and seek more information to understand the current and future needs of diverse groups and assess the impact of current policies and approaches on these groups
- We will establish an appraisal process for major disabled adaptations, working with Adult Social Care and Children's Social Care to explore all viable options to meet residents' needs
- We will ensure our register of adapted properties is up to date on Keystone and linked to Open Housing to inform re-letting
- We will increase our engagement with residents through more detailed satisfaction surveys and a systematic approach to gathering and recording feedback
- We will establish a resident group specifically focussed on repairs and asset management, as a sub group of the Resident Participation Panel, and;
- Develop mechanisms for regular and timely feedback from residents.

7.2 Asset Management Strategy – Our Homes

7.2 - Our Homes

Key points: Our Homes

- The council is responsible for approx. 12,000 homes across the borough.
- A large proportion of our stock was built in post-war period and as a consequence we have high numbers and a wide variety of homes built with non-traditional construction techniques, some of which will need significant structural work to extend their lives
- Our investment standard has followed the government's Decent 'Homes Standard' and we are looking to revisit this in consultation with our residents and reflect the proposed review of this standard set out in the Social Housing White Paper
- We have up to date survey data on 25% of our stock and aim to complete 100% surveys over the next five years
- This information tells us we need to spend over £500m on planned investments in our homes and estates over the next 30 years.



7.3 Asset Management Strategy – Portfolio Summary

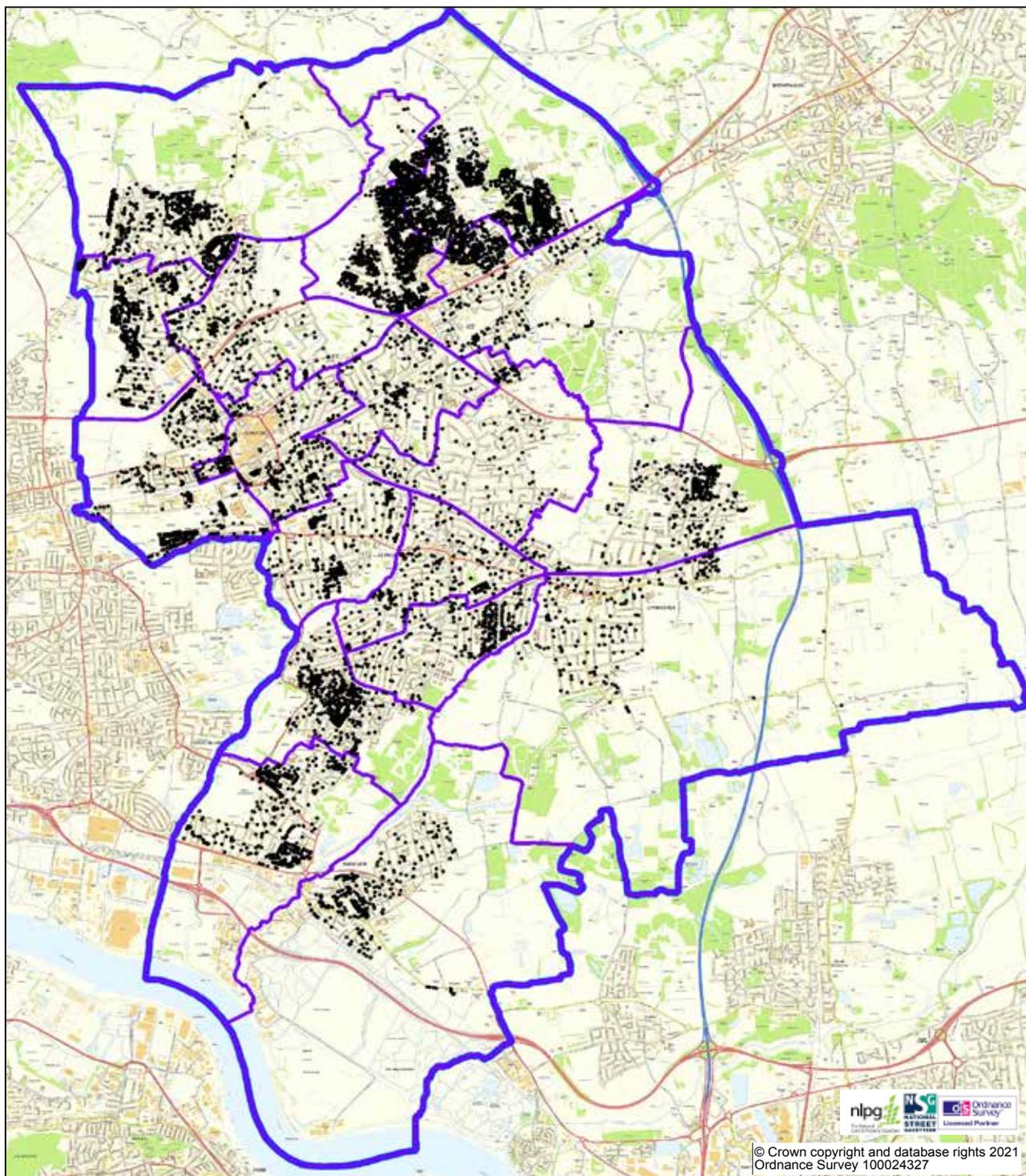
7.3.1 - Overview

This strategy covers all HRA assets. This includes tenanted homes along with properties occupied by leaseholders and a variety of non-residential assets including commercial properties (shops) and

garages. Excluding properties on estates undergoing regeneration, this strategy focusses on the condition and investment plans for the circa 8,250 properties remaining.

The location of our homes is illustrated below.

Map of existing Council housing

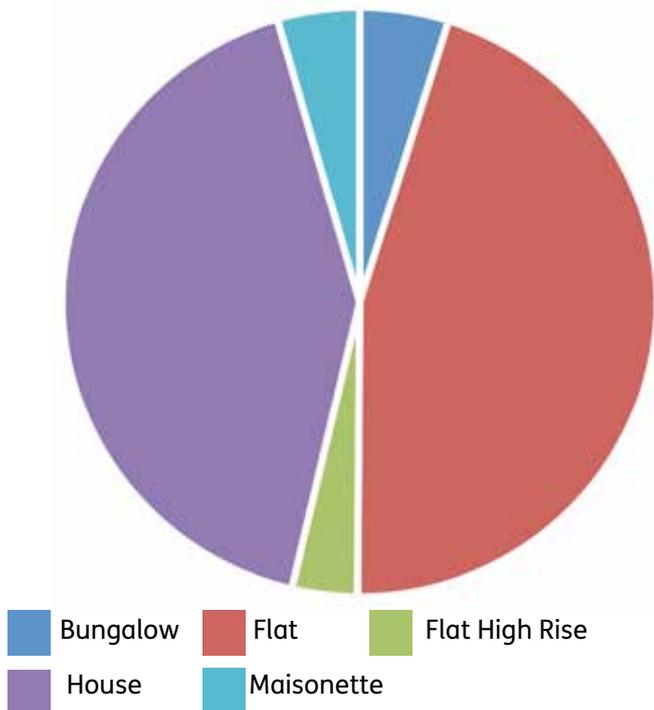


7.3 Asset Management Strategy – Portfolio Summary

7.3.2 – Size and type

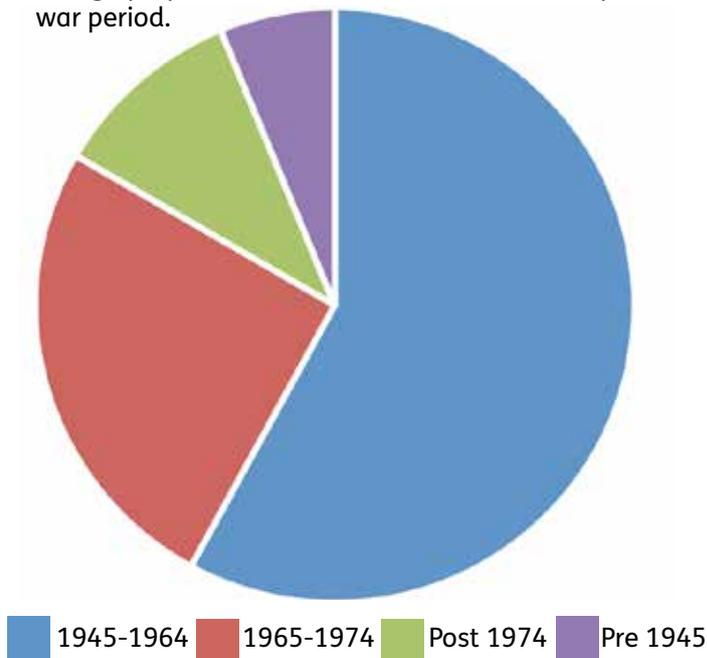
53% of our stock are flats spread across some 1,000 blocks including 10 ‘high-rise’ dwellings, (these are buildings which are over 18 metres in height).

Property Type – tenanted

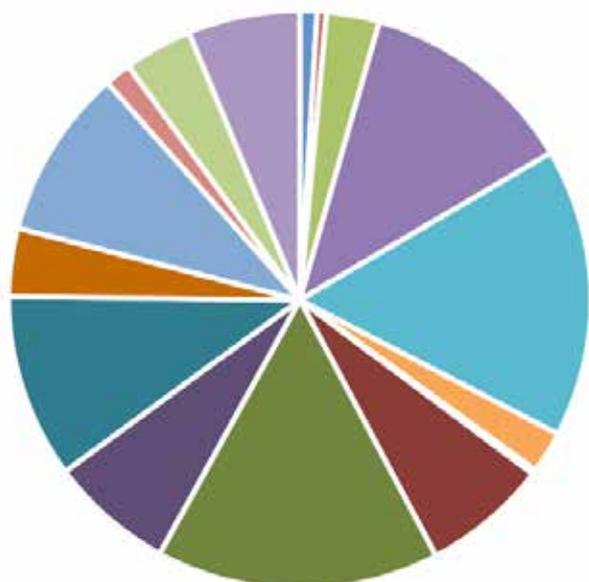


Property Age – tenanted

A large proportion of our stock was built in the post war period.



Non-traditional construction types



- Airey Type PRC
- Cornish Type (II) PRC
- No-Fines
- Stent Type PRC
- Belfry Type PRC
- Hillrise
- Non Traditional
- Timber Framed
- BISF Type (A1)
- Intacon Type
- Orlit Type (II) PRC
- Unity Type (II) PRC
- Cornish Type (I) PRC
- Llewellyn Type
- Scottwood Type
- Wates Type PRC

We have a significant proportion of properties (circa 1,150 homes / 14%) built of the type of non-traditional construction types common of the post war period.

We have carried out significant investment to upgrade external wall insulation to improve the thermal efficiency of these homes.

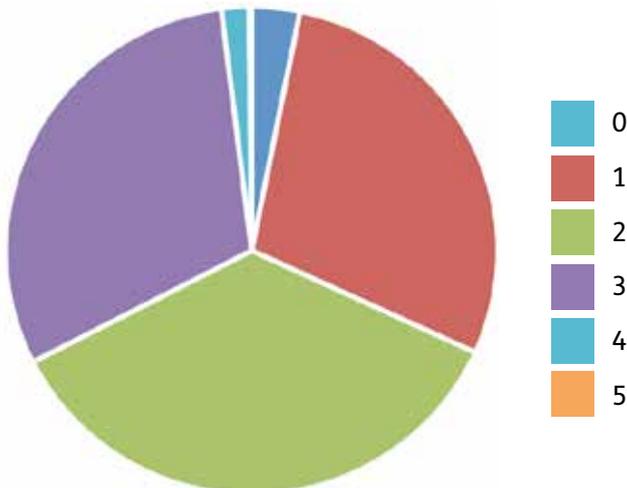
There remains some risk of future structural defects on some construction types; this is kept under review with regular surveys to identify issues in good time.

7.3 Asset Management Strategy – Portfolio Summary

7.3.2 – Size and type (continued)

Property Type – bed size

32% of our rented homes are one beds or bedsits and we have very few larger family homes as set out in the previous section.



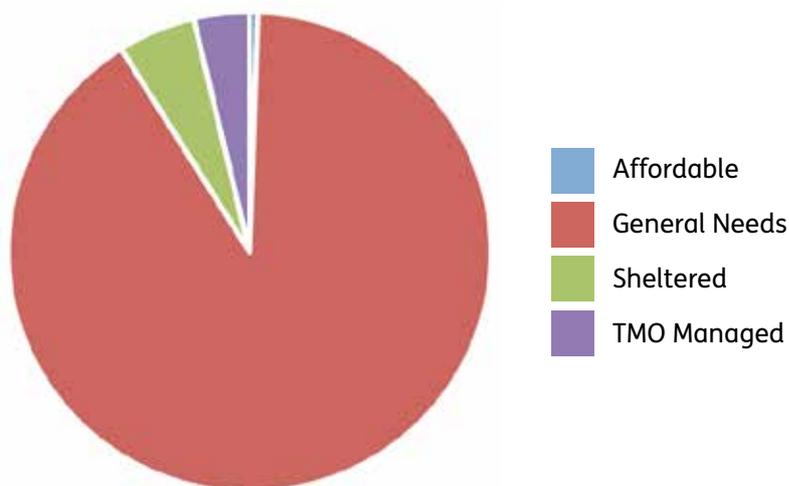
The majority of our homes are let to general needs tenants. We have a little under 500 sheltered housing properties or older people across 14 schemes. We believe that this level of provision broadly matches demand. We have carried out significant investment in our schemes to remove non-self-contained dwellings and bring all properties up to the decent homes standard.

We recognise however, that there will be further work to do in some of our schemes to ensure they remain attractive to residents in the long term, for example the installation of lifts and improvements to communal areas.

We are particularly keen to develop additional extra care facilities and this is being progressed in partnership with Adult Social Services and in conjunction with our regeneration plans.

We are reviewing our current extra care provision to decide our future development needs. We are developing a Retirement Village with 172 flats; these are a mix of sheltered affordable rented, shared ownership and outright sale for older people.

Property Type – tenure



In addition to the rented homes described above, we manage some 2,000 leasehold properties.

We remain responsible for repairs to shared facilities such as lifts, lighting, shared heating and hot-water

systems, the roof and structure of the building, as well as internal and external communal areas, and the cost of these works is recharged to leaseholders under the Council’s policy.

7.3 Asset Management Strategy – Portfolio Summary



7.3.3. – Investment standard

Our 'Investment Standard' to date has followed the Government's 'Decent Homes Standard'. This means that we aim to keep properties warm and safe, and to ensure that components are replaced regularly to ensure they remain in good condition. When we replace things, we also aim to bring them up to modern standards.

When putting together programmes of investment we consider age and condition of components. We have taken an enhanced approach to bring forward the replacement of kitchens to 20 years and bathrooms to 30 years. We are mindful that the expectation of our residents is that we also maintain the communal and external areas to a reasonable standard and we need to consider how our investment approach can be expanded to reflect this. We also need to make sure that we contribute to national targets around thermal efficiency and reduction of carbon.

The Social Housing White Paper has promised a review of the case for a change in the 'Decent Homes Standard' by autumn 2021. In the meantime, we will work with our residents to review our approach to investment and standards. This will establish a Havering 'Investment Standard' that is affordable in our business plan and meets residents' priorities.

Our new 'Investment Standard' will also need to reflect enhanced requirements for building safety and ensure our homes are future proofed from a digital perspective including digital inclusion for our residents and smart technology to assist the maintenance of our homes and the comfort of our residents.

7.3.4. - Stock condition

We have up to date information on the condition of our stock, based on a 25% sample survey carried out by Savills in 2020.

The survey data indicates that we need to spend a total of £360m over the next 30 years to maintain our stock in its current condition. In addition, we estimate the need to spend £18.7m on environmental improvements and £19.6m on related assets (e.g. garages, paths etc.).

We have included additional allowances to address the need to remove asbestos from some of our properties when we carry out component replacements (£3m in the next 15 years) and an allowance of £10m over the next 10 years for mechanical and electrical repairs to our blocks.

We have included a further £18m for building safety improvements and £75m for zero carbon. All these estimates will need to be refined with further detailed survey work. This results in a combined total of over £500m of investment needed in the stock over the next 30 years. This is in addition to c. £13.2m per annum needed for regular repair and maintenance, cyclical decoration, void works and health and safety compliance.

We plan to continue a programme of surveys so that we have data on 100% of our stock within five years. We also have systems in place to update the data regularly as work is carried out on our homes. We aim to build up the data in our keystone system to provide a comprehensive register of all our stock holding. This will be fundamental to our ability to plan investment and consider options for the future of our stock.

Of our stock, 99.8% is currently at the decent homes standard. This reflects some programme delays in 2020 due to coronavirus restrictions. We continue to aim for our target of 100% compliance as these restrictions are relaxed.

In addition to the allowances above, we are aware that over time there is a risk that major structural work will be needed to extend the life of some of our homes of non-traditional construction. Further surveys will be carried out on this stock in order to inform our understanding of these properties and the cost of remedying any major defects in future.

7.3 Asset Management Strategy – Portfolio Summary



7.3.5 - Compliance and building safety

We are closely following the government’s consultation on building safety and the emerging ‘Building Safety and Fire Safety Bills’. In the meantime, we need to do everything that we can to make sure our homes are safe. We will need to invest to improve fire stopping and replace some of the older cladding on our tower blocks.

Our detailed policies covering our major areas of compliance including fire safety, asbestos, gas, legionella, electrical testing and lifts, and these have been subject to third party review. We are now focussing on ensuring we have the right checks and balances and competencies in place to support delivery including a documented controls environment.

We report on our position in all six areas monthly to the senior leadership team and Cabinet Members, and maintain an up to date risk register. Specialist third party support is provided to ensure information is scrutinised and acted upon appropriately.

Our data is currently held across a variety of systems and spreadsheets and we are working on consolidating this into our single asset register on ‘Keystone’. We expect the majority of data to be on ‘Keystone’ by 2021.

In addition, we have a continued commitment to carrying out works identified through fire risk assessments. We continue to monitor the progress of the Building Safety Bill so that we can put in place a proportionate response to any emerging requirements in a timely manner.

7.3.6 - Energy performance

We are committed to ensuring that our homes are warm, and easy to heat for our residents. The current fuel poverty regulations require a minimum EPC standard of ‘C’ by 2030, which is the target we are committed to make. We are also mindful of the government’s commitments to reduce carbon emissions to net zero by 2050, as well as the shorter timescales of 2040 endorsed by the Leader of Havering Council.

Currently we have approximately 2,620 homes below the standard required by 2030 (based on a SAP (-standard assessment procedure - rating below 69). The solutions for these properties will vary based on different property types.

Longer term our approach to carbon reductions will require a tailored approach for different buildings. We are working to understand the range of interventions that are possible, and the implications for the different options in terms of cost of works, reductions in cost of use for residents and reductions in carbon emissions.

Once this work is complete, we will refine the cost estimates in our business plan and develop an investment strategy that will deliver and comply with regulatory requirements.

Our delivery plan will need to take into account the lifecycles of existing components and upgrade facilities as they become due for renewal. At the same time, we will explore all possible options for funding to support this work, and work with other landlords and experts

7.3 Asset Management Strategy – Portfolio Summary



7.3.7 - Garages

It is recognised that parking is one of the three top issues for residents in Havering but it has also been long acknowledged that the garage sites in the HRA are not realising their maximum benefit.

We have approximately 1,000 garages and parking areas on hard standings that together generate an income of circa £320,000 p.a. for the HRA. To ensure garages don't remain void for too long, we have a dedicated garage manager who is developing a proactive approach to secure more lettings. Rents vary based on an assessment of demand in each area.

Various options have been explored for the future of sites in low demand, including demolition and provision of parking on-site via hard standings, exploring alternative uses for the site including redevelopment, and ultimately disposal. Our regeneration programme will address some of the issues on a proportion of these sites.

We will develop a strategy for the remaining garage sites. Where there is clear demand from residential customers and where this is the best use of the site, we will continue to make garages available, but, in other cases, we will seek to support corporate priorities relating to development and income generation through active management of our garage portfolio. Consequently, over time the number of garages available for rent will reduce.

Going forwards our strategy will be:

- Developing a proactive lettings policy, allowing use of garages for parking or storage, ensuring rent levels are aligned with market rates in high demand areas and investing to secure long-term demand
- Continuing to explore development potential across all sites, looking at the sites themselves and adjoining land and surrounding properties where these demonstrate the need for regeneration

- Targeting low demand sites for disposal where this would not create barriers to our own development or effective estate management and where there is no other viable commercial use.

Decisions to invest will be made based on a systematic assessment of the future financial viability of each site alongside the potential to increase income through proactive lettings and/or options for alternative use. All options for alternative use will be considered including storage, micro energy generation, Electric vehicle charging and advertising hoarding.

7.3.8 - Other non-residential assets

We have 175 shops across 11 sites held within the general fund, some of which have residential properties attached to them. Some of the sites are on our regeneration estates and their future will be considered as part of the master planning for each estate.

Others will be managed by the Council along with other corporate assets. We also have one community centre which is managed in this way. We will work with the Council's commercial management team to ensure the potential of these units is maximised for the benefit of local residents whilst exploring alternative uses where there is limited demand.

We have included an allowance in our stock condition survey for the maintenance of parking areas, bin stores, boundary fencing and garages on our estates but only limited allowances are included at this stage for any improvement due to the limits on business plan affordability.

We will add details of all non-residential assets to the comprehensive asset register that we are creating so that we can proactively manage their future in consultation with local residents.

7.3 Asset Management Strategy – Portfolio Summary



7.3.9 - Routine and planned maintenance

We want to move to a proactive repairs approach. The aim of this approach is to reduce the demand on repairs, moving from an ad-hoc to a planned basis.

We will do this by the introduction of a cyclical 'MOTs' programme in our properties and through the introduction of cyclical planned external redecoration, drain clearance and gutter clearance.

We will have a new repairs contract in 2022 and will monitor the impact of these cyclical programme on future repairs budgets and on resident satisfaction. We will continue to monitor the drivers for repairs volumes and use this information to inform planned investment.



Key actions: Portfolio summary

- Develop a Havering Investment Standard in consultation with residents
- Build a comprehensive asset register including up to date data on all our owned stock and its condition, with links to mapping and existing management systems
- Carry out additional surveys to understand level of investment needed in mechanical and electrical upgrade works in our blocks and the structural requirements for homes of non-traditional construction.
- Understand the range of solutions to improve the thermal efficiency of our dwellings and deliver zero carbon through a costed delivery strategy.
- Develop a systematic approach to evaluate the performance of our garages
- Ensure details of all non-residential assets are included in our asset register.
- Develop a proactive approach to the management of our shops, community centre, play areas and office space, maximising income while ensuring a viable provision of important community services, exploring alternative options where there is low demand
- Monitor the drivers for repairs volumes and use this information to inform planned investment.

8.1. Active Asset Management

– Understanding the performance of our stock

Key points: Active Asset Management

- We have a good understanding of the performance of our stock against our financial and social objectives. This is used to improve financial viability and target interventions and option appraisals.
- We are establishing a framework of option appraisals prioritising homes / schemes with poor financial performance. Appraisals are informed by the social performance analysis so that we take decisions in the context of the social value that our homes contribute.
- We have included information on the market values of our properties alongside our performance assessment to inform our approach to disposals of poor performing properties at void to remove major liabilities and release resources for new development.
- Clear principles are in place to guide consideration of property acquisition to support our regeneration and asset management strategies, should the opportunity arise.
- As our understanding of the costs of improving energy efficiency and reducing carbon emissions is better understood, we will build this into our performance assessment and options appraisal framework.

8.1 - Understanding the performance of our stock

We take an active approach to the management of our assets, supported by our understanding of the performance of our homes. The current evaluation was completed in 2020. The evaluation considers performance from three aspects:-

- The financial performance of properties in the business plan
- The social housing outcomes that we want to achieve
- Local markets and demand

The analysis relies on robust data including up to date information on the future investment needs of our stock, and a good understanding of the cost of day-to-day operations, as well as a good understanding of social issues including rates of anti-social behaviour, deprivation and fuel poverty (for example). Further details of the evaluation of stock follows: -

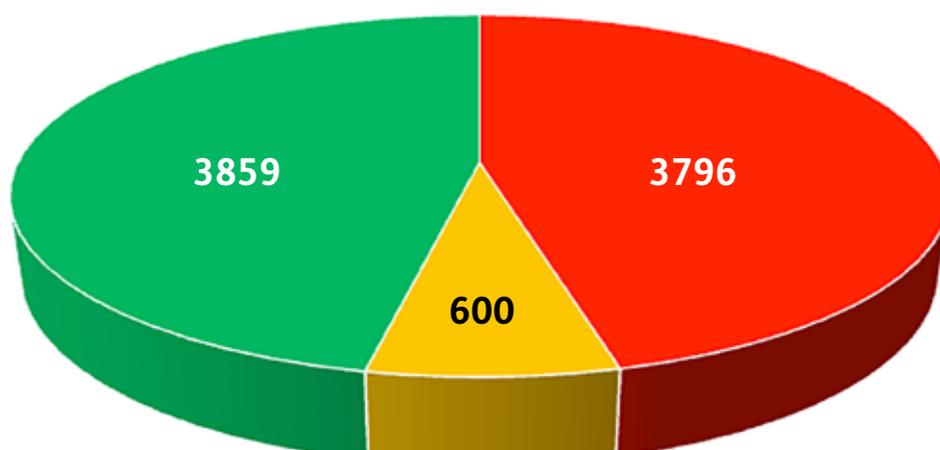
8.1.1 - Financial performance

Our evaluation shows a total NPV of £49.30m across 8,255 rented homes, equivalent to an average Net Present Value (NPV) of £5,973. Performance varies across the portfolio and this presents some challenges for our asset management strategy. 46% of the homes (3,796) show a negative NPV over 30 years representing a liability to the business plan of over £33.31m.

A further 7% (600 homes) show a marginal NPV (defined as between £0 and £5,000) representing a further risk to the business plan. Nearly 47% of homes show good strong cash flows above £5,000 per unit. It is these properties that support the business plan to allow the Council to deliver across all homes.

The range of performance is illustrated in the table below

Financial performance (NPV)



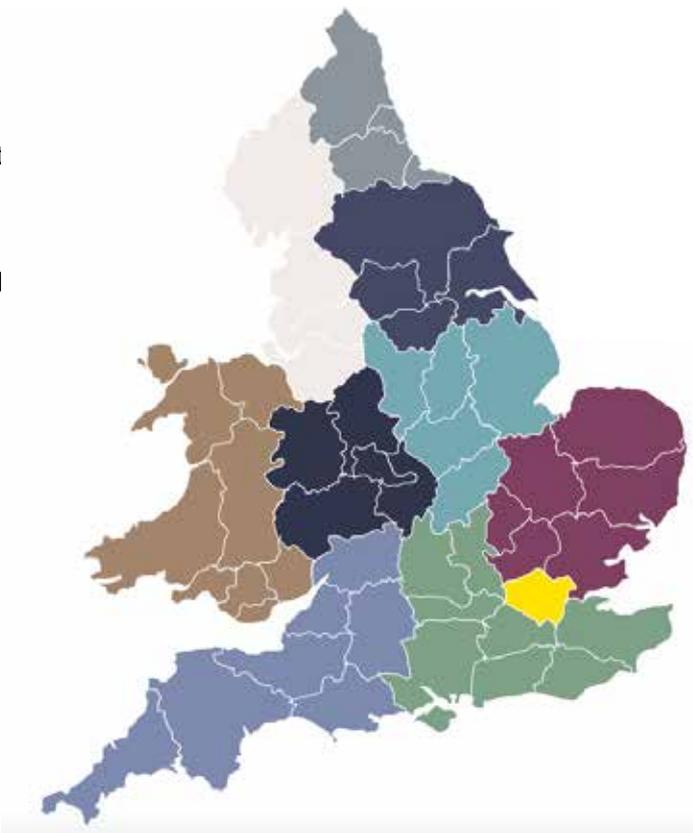
8.1. Active Asset Management

– Understanding the performance of our stock

Our NPVs are lower than benchmarks in London due to the lower rent levels that reflect Havering's position as an outer London borough. Our rent levels are closer to benchmarks in the East of England, reflecting the affordability of our market. Our costs are higher than benchmarked in both London and the East of England.

In part, this is due to the fact that we are using up to date survey data which reflects emerging requirements for building safety and initial estimates for zero carbon which are not necessarily present in comparisons from other providers.

Our operating costs are also higher than benchmarks and this is something that requires review.



East of England

- 14.1% of the sample
- Rents – £103.55 p.w.
- Void & bad debt – 1.48% p.a.
- M&M – £1,990 p.u. p.a.
- 30Yr SCS – £31,140 p.u.
- 30Yr NPV – £26,400 p.u.

London

- 12.6% of the sample
- Rents – £116.47 p.w.
- Void & bad debt – 2.25% p.a.
- M&M – £2,420 p.u. p.a.
- 30Yr SCS – £30,280 p.u.
- 30Yr NPV – £30,600 p.u.

Havering

- Rents – £100.52p.w.
- Void & bad debt – 1.92% p.a.
- M&M – £3,366 p.u. p.a.
- 30Yr SCS – £42,891 p.u.
- 30Yr NPV – £5,973 p.u.

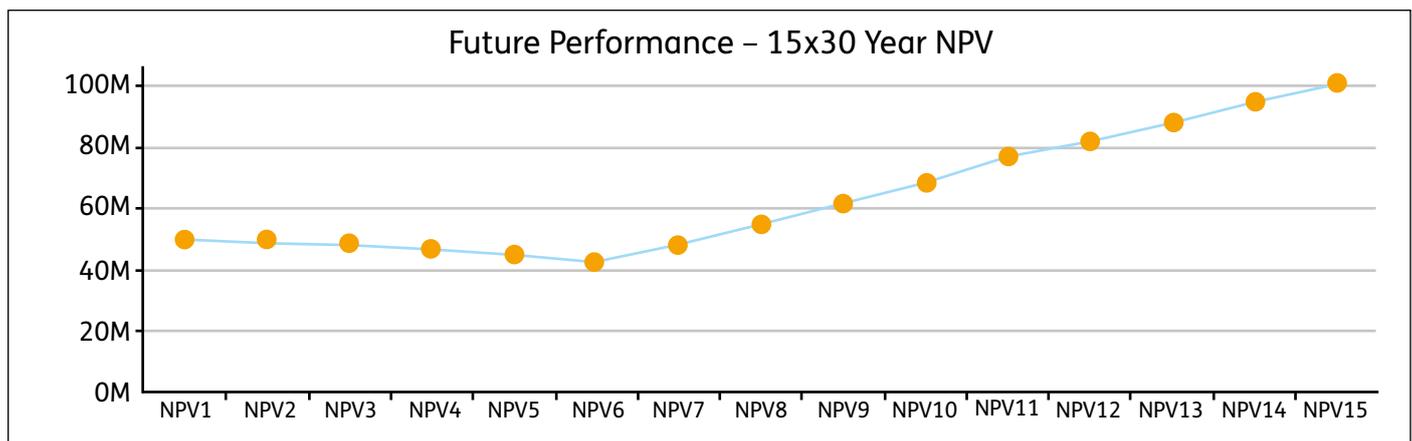
Benchmark NPV performance and key performance drivers

The model provides a projection of future NPV. In 2020, NPV growth was predicted to decline in the short term and then increase sharply reflecting reduced investment rates in later years.

Our framework of appraisals to tackle poor performance will aim to reduce this decline in the short term and improve on the longer-term growth rate in order to

increase business plan capacity to deliver the Council's social housing objectives.

The rate of growth should increase as new properties are developed as part of the regeneration programme, which are currently not included within the asset performance modelling.



8.1. Active Asset Management – Understanding the performance of our stock



8.1.2 - Analysis of social performance

We also looked at the performance of homes against our corporate objectives, looking at measures linked to our themes of helping communities, place making, providing opportunities, and improving connectivity.

This analysis showed a clear difference in our ability to achieve our social objectives in different parts of the borough. It enables us to identify areas where social sustainability is weak and take action through neighbourhood planning and asset management to improve the extent to which the Council is meeting its social housing objectives.

Where homes score poorly, these represent areas where our asset management and community investment strategies need to target social issues, alongside investment and regeneration of our existing homes.

8.1.3 - Market context - Analysis of social performance

Our development and regeneration strategies aim to increase the numbers of affordable homes available to our residents. Our asset management strategy includes actions to support these objectives.

We have included information on the values of our homes on the open market (based on valuations prepared for our HRA accounts) so that we can compare the value of homes in their existing use (measured by NPV and social performance assessment) with their value if disposed of vacant.

Where we have poor financial performance (measured by NPV) and relatively high open market values, we will consider whether disposal of properties that become void may release resources that could deliver an increased number of new affordable homes.

Before decisions on void disposals are made, the social value of the homes, as measured using our social performance assessment will be considered. Conversion for alternative uses such as temporary accommodation will be considered prior to disposal.

This analysis will enable us to develop a proactive strategy of void disposals that will retain stock where it is serving a strong social purpose and release resources where they may be better deployed on new homes.

We have a programme of acquisitions of properties including those previously sold under the right-to-buy. This supports our regeneration strategy as well as responding to local needs and to take opportunities from the market.

It provides an opportunity to meet housing need where development opportunities are more limited. The business case required will ensure we acquire properties with strong NPVs into our plan to increase capacity. The recent government consultation on the use of receipts from right-to-buy sales extends the period local authorities have to spend the receipts from three to five years.

The percentage cost of a new home that we can fund using right-to-buy receipts has also increased from 30% to 40%. This will make it easier for us to undertake longer term planning and fund replacement homes.

8.2. Active Asset Management – Using the results to inform strategy



8.2 - Using the results to inform strategy

The results from this performance analysis have been used in the development of this asset management strategy including:

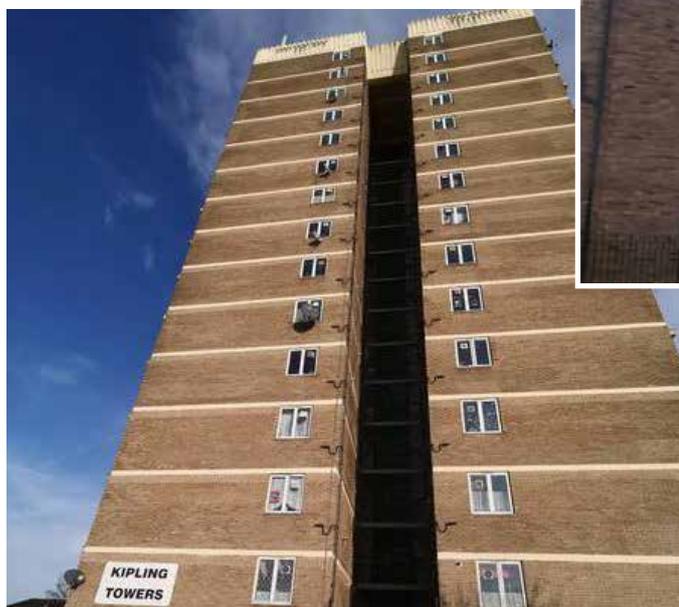
- Establishing a 5-year investment strategy for the stock, based on a transparent investment standard which prioritises investment decisions based on the performance of homes and business plan's affordability
- The production of a 30-year investment profile that manages critical points in the cash flow
- Identification of candidate asset groups for more detailed options appraisals

- Developing further local regeneration plans, using an understanding of the performance of existing assets to inform future regeneration priorities and opportunities to support future new homes.

Our aim over time is to replace poor performing stock with new housing of higher quality to meet our affordable housing needs. This will improve the satisfaction of residents with homes that are better suited to current aspirations, demand and household size.

It will also mean that over time our average NPV will improve, and NPV growth will be stronger in future increasing business plan capacity to deliver our objectives.

8.3. Active Asset Management – Options appraisals



8.3 - Options appraisals

We propose a framework of options appraisals to be carried out over the next 24 months targeted at properties that perform poorly on a financial basis, and informed by an understanding of social performance and market context. All feasible options for improvement will be explored where these deliver our objectives and improve our offer to residents.

Our approach will prioritise those properties that perform poorly at an asset group level, for example an entire block or street of houses is, on average, poorly performing financially. There will be pepper-potted properties elsewhere that show a negative NPV. These will be picked up at void.

Triggers for options appraisal will be:

- Stock with a negative NPV (3,585 properties in 67 asset groups)
- Stock with a marginal NPV (below £5,000) (503 properties in 13 asset groups)
- High market value/poor performing stock where there may be opportunities to release value to contribute to our development programme
- Stock where cost to bring to EPC 'C'/zero carbon is prohibitive.

Where we identify blocks where additional costs are needed to remedy building safety, and where we identify blocks requiring high costs to reduce carbon emissions, we will update our NPV assessment to inform our option appraisal framework.

Our appraisal process will follow a two-stage process:

- The first stage will explore the reasons for poor NPV, and to understand how the delivery of our social objectives can be improved. We will carry out a high-level assessment of opportunities for improvement. We will then identify the available options to be appraised based on the location, property type and current occupancy and conclude with a high-level view on the solutions which merit more detailed appraisal.
- The second stage will be an in-depth appraisal of the identified options, including estate regeneration for identified estates or stock types alongside other options including tenure conversion and disposal where these fit with our social objectives and deliver the best outcomes for our business plan and our residents.

We are developing our asset management team to provide resources to carry out these appraisals, with external support and validation. The parameters of the appraisals will be agreed with finance and our regeneration team in order to provide a co-ordinated approach.

In all cases, the appraisal process considers the social issues in the area and takes a broader neighbourhood view, including consideration of other non-residential assets (e.g. garages, land).

Success criteria for appraisals will consider the impact on the business plan and outcomes for residents. Success measures will include:

- NPV increase/increase in net income
- Agreed hurdle rates for redevelopment options in line with our regeneration approach
- Improvement in social scores
- Reduction in liabilities for poorly performing stock
- Release of value and/or land
- Growth in numbers of affordable homes.

8.3. Active Asset Management – Benefits of options appraisals



The benefits of this active asset management approach are that it would enable us to:

- Provide evidence to inform local management strategies to improve the financial performance and sustainability of neighbourhoods and the satisfaction of residents
- Strengthen our business plan
- Make more efficient use of capital resources available, releasing resources for new investment
- Consider long-term planning for obsolescence, putting in place short and medium term investment strategies for assets identified with limited financial viability in the longer term
- Obtain a balance between new build, remodelling and stock investment
- Test alternative strategies
- Improve asset led value for money, delivering a good return on social housing assets, where investment delivers an increase in value (to our business plan and to our residents) over time
- Address regeneration needs to improve the sustainability of neighbourhoods
- Communicate reasons for difficult decision to members, staff and residents, working with stakeholders to deliver improved outcomes
- Assist us in delivering our social and housing objectives.

As viable options emerge through the appraisal process, these will be presented to Cabinet and agreement sought to engage residents in consultation in order to develop local plans. The outcome of that consultation will be presented to Cabinet before decisions are taken to implement any recommendations for change arising from the appraisal.

Major investment decisions in properties identified for appraisal will be deferred until options appraisals are complete. An interim investment plan will be established for these properties to ensure essential health and safety requirements are maintained.

Appraisals will be prioritised based on those with the most immediate investment need first, in particular building safety, in order to minimise the time that properties need interim investment plans before long-term decisions are made.

Options for alternative use of void properties within our appraisal framework will be explored including use as temporary accommodation and other tenures.

8.4. Active Asset Management – Stock disposals



We will develop a strategy to assess properties as they become void and consider a range of potential options, the trigger for these assessments will include;

- Properties which we will not be able to bring up to required energy standards
- Properties where major structural improvements would be required to provide a long term life, to meet 'Decent Homes Standards' (including Housing Health and Safety Rating System – HHSRS) or to meet Building control, and that work is not financially viable
- Properties with major safety issues that cannot be remedied effectively
- High value properties that perform poorly in our business plan as social housing.

We will develop a model to enable us to identify candidate properties before void so that decisions can be taken promptly and so that if the decision is taken not to dispose, that defects can be remedied and the property brought back into use as quickly as possible.

This model will be used to develop a full divestment strategy indicating the number, type and location of properties likely to become available for alternative options, the likely level of receipts to support future affordable housing and the route market to effect the disposal. This will be presented to Cabinet for agreement on core principles.

Key actions: Active Asset Management

- Develop systems to enable updating of data and information on an ongoing basis, allowing us to update our performance model at least every two years
- Incorporate into our performance assessment the costs to deliver zero carbon, and any new requirements on 'Decent Homes 2' and Building Safety as soon as information is available either in the form of new guidance from Government, or as a result of further survey work
- Develop the resources of our team and our approach towards option appraising our stock which meets agreed performance triggers, establishing the principles of an options appraisal framework by June 2022
- Complete a programme of appraisals of poorly performing stock by the end of 2022
- We will develop a divestment strategy, policy and processes to be approved by relevant stakeholders.

9. Investment planning

Key points: Investment Planning

- The stock condition investment costs are affordable in the business plan overall
- We will prioritise investment based on the agreed criteria, with a focus on health and safety of our homes and repairs
- A resident group will be established as a sub group of the Resident Participation Panel to ensure investment priorities reflect resident's views.

- We will apply agreed investment rules and principles when deciding on elemental replacement with a focus on investment need rather than lifecycle
- Our approach to asset management will deliver value for money from efficiencies in programme delivery, benchmarking performance and maximising return on assets.

9.1 - Business plan affordability

Our stock condition data presents a position that is affordable in the business plan overall due to increased borrowing and drawdown of reserves. The business plan includes the amounts set out to replace existing building elements as they become due, and provides for full stock condition costs and environmental improvements.

It also includes additional provisions for building safety, compliance, works to related assets, aids and adaptations for disabled residents and some provision for the delivery of zero carbon. The full cost of zero carbon delivery, however, exceeds allowances currently in the business plan.

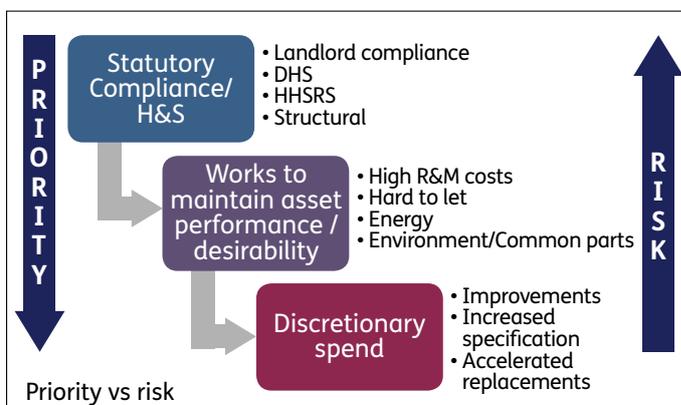
9.2 - Investment priorities

In order to ensure that the standard of investment that has been delivered to the stock is maintained, the investment programme will prioritise works to the long-term sustainable stock within available budgets under the agreed criteria including:

- **Overarching Priority:** We will consider zero carbon approaches in all programmes we develop, looking for opportunities to maximise benefits to residents and reduce carbon.
- **Priority 1:** Works that maintain the integrity of the building. This includes statutory and regulatory compliance such as fire safety, gas servicing, lift servicing, HHSRS, structural, risks to residents, disrepair, decent homes and Energy Performance band 'C'
- **Priority 2:** Works that impact on high responsive repair costs and potential future disrepair e.g. roof repairs, internal electrical and plumbing, damp proof course etc. and regular external and communal area maintenance and redecoration, and estate improvements already provided for within the business plan
- **Priority 3:** Further estate improvements and management of environmental areas, trees, footpaths and open spaces, enhancements to overall appeal of our estates, parking and security where not included in any new decent homes standard, and works to improve digital connectivity and innovation.

The highest priority items carry the greatest risk if they are not delivered. Generally, the higher the priority the

lower the scope for either delaying or not delivering the associated programme of work, illustrated in this table.



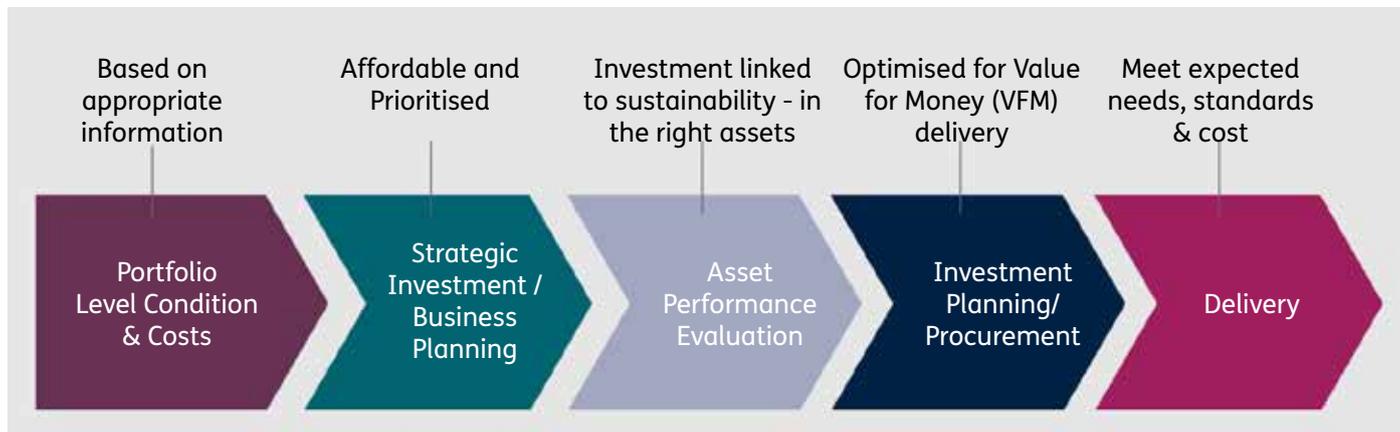
These priorities will be reviewed in consultation with residents, and as the review of 'Decent Homes Standard' progresses.

Some investment costs for Priority 3 are included within the current business plan, but not all, and currently whilst some provision is for the investment required within our estate improvement programme, environmental improvements will require additional capacity within our business plan, and attracting grant funding when available, and will be subject to business case to test the value of improvements delivered in line with our energy and regeneration strategies.

A resident group/panel will regularly revisit these priorities to ensure they reflect what residents feel is important to them. Residents will also be able to scrutinise investment plans and challenge investment decisions based on the criteria agreed above.

9. Investment planning

Investment planning process



9.3 - Investment planning

Our approach to investment planning can be summarised in the diagram above.

Whilst it is apparent that most dwellings will require some work, not every home will require all elements. In order to deliver a programme that is both affordable and meets our business plan, it is necessary to apply a clear set of investment rules and principles to decide when each element will be replaced.

The process and tests that we will follow in preparing investment plans is illustrated above. This ensures that our plans are rooted in investment need, adjusted to be affordable within the business plan, with a clear audit trail of any adjustments required. This is then overlaid with the sustainability modelling of asset performance to ensure investment is targeted at the long-term sustainability stock.

Work packages are then optimised for value for money of delivery. Success measures for delivery will be measured against need with outturn costs compared with target costs by element.

1. Ensuring the stock remains compliant with statutory regulations including:

- Rectification of works identified through fire risk assessments, electrical testing regime and the gas maintenance programme.
- Installation of modern smoke alarms and Carbon monoxide detectors where applicable.
- Targeting low energy rated properties with the aim to increase properties with an existing SAP rating of D, E & F to an EPC rating of 'C' by 2030 where they can demonstrate long-term viability in our plan.

2. Identifying means to address foreseen or unforeseen issues that are to the detriment of the building or the health and safety of the resident. This will be assisted by focusing investment on known elemental failure hot spots within the stock profile and in turn help mitigate disrepair claims.
3. Ensuring investment aligns with corporate objectives.
4. Ensuring planned works remain on a yearly basis within the constraints of the business plan.
5. Ensuring the investment planning process takes into account stock sustainability by giving consideration of the Asset Performance Evaluation model and requirement for option appraisal work.
6. Driving efficiency through programme delivery and procurement including:

- Dividing the stock in to priority geographical areas to enable compliance works to be targeted and maintained, works to be programmed on an equitable basis, manageable contracts to be let, works to be efficiently programmed over the five-year period and addressing sustainability issues.
- Developing work packages which incorporate associated replacement elements (e.g. chimneys with roof replacements) in order to maximise economic delivery, limit the number of site visits and minimise disruption to customers.
- Assess means of dovetailing planned works in accordance with other investment programmes such as cyclical decoration programme and estate improvement/kerb appeal schemes.

9. Investment planning



9.4 - Procurement

The delivery of our investment programme will be procured externally directly with the market or through existing external frameworks.

We will focus on securing longer-term contracts over e.g. five-year periods and package the works appropriately, grouping key components such as kitchens and bathrooms. These will be subject to approval with a strong focus on value for money.

9.5 - Value for money

One of the principles of our strategy is to use our assets wisely, generating a social and/or financial return.

This strategy includes actions that will evidence value for money through:

- Cost reductions from efficiency in delivery and procurement of our capital programme and day-to-day maintenance – releasing resources for reinvestment in our homes
- Benchmarking the performance of our contractors and delivery teams
- An approach to asset performance evaluation that enables us to maximise return on assets (social and financial)
- Actions to increase the number of homes in ownership through regeneration, bringing empty homes back into use, and new build development on our land

- An approach to investment planning which ensures works are delivered efficiently and remain affordable

- Correct identification of works through the stock survey and pre-works scoping to ensure sufficient quality information is available to build a programme based on correct volumes of replacements, thus minimising abortive work/visits and unplanned additional costs

- Ensuring we make best use of our non-housing assets such as our garage and commercial portfolio reviewing the current use and alternative options, whilst maximising income.

We will also explore value for money through developing commercial opportunities for us to provide services to other organisations, for example asset modelling and appraisals.

The acceleration of spend to deliver our zero carbon programme will create additional pressures on value for money.

Key actions: Investment Planning

- Utilise our resident group/panel to regularly revisit the identified priorities and ensure they reflect resident needs and what they say is important to them
- Follow our agreed investment planning methodology, and ensure we review and agree on an annual basis a one year, five year and 30 year investment plan
- Update our investment priorities and rules where required to reflect recommendations from the resident board and external reviews (e.g. building safety), including changes in regulation and legislation and affordability in the business plan
- Explore commercial opportunities for asset management service provision to others.

10. Dissemination and communication of this strategy

Housing Services will consult with all directly or indirectly affected stakeholders to ensure this strategy fulfils its purpose to be clear and transparent. It will be made available internally and externally in print and electronic formats.

It will also be made available in easy-read and multi-lingual versions, copies of which will be obtainable upon request.

11. Monitoring and review of this strategy

Key points: Monitoring and review

- A clear framework is in place for the governance of this strategy, including annual reports on progress of the action plan
- We have robust internal controls to ensure we have insight into asset management practices and outcomes, and can ensure they perform as intended
- The strategy covers a five year period from 2021 – 2026. Investment plans will be reviewed annually. The strategy will be reviewed annually
- Accountability for, and delivery of, this strategy sits with the Assistant Director of Property Services.

11.1 - Performance monitoring

Investment plans and the results from options appraisals leading to alternative proposals for assets will be reported to the Housing Management Team, Senior Leadership Team (SLT) and Cabinet.

Reports will include financial and quality out turns against plans. We will measure our success through a range of Key Performance Indicators (KPIs) which include:

- Overall growth in NPV above forecast
- Option appraisals within 24 months for all properties which meet the triggers established
- To have no properties with an EPC rating below 'C' by 2030 with alternative options explored where this is not feasible
- Maintain decent homes standard including adopting any new guidance issued
- Adherence to planned works budget and timescales
- Compliance with all health and safety, regulatory and statutory standards
- Top quartile resident satisfaction.

11.2 - Governance

The accountability for key aspects of this strategy is set out below.

Tasks	Executive Role	Cabinet / Cabinet Member Role
Drafting, maintaining and updating the Asset Management Strategy (AMS)	Prepares draft AMS for Portfolio Holder/Cabinet Member decision. Maintains AMS. Provides annual update of AMS. Provides full periodic reviews of AMS.	Approves draft AMS. Approves annual updated AMS and periodic reviews.
Implementing stock options appraisals and managing outcomes	Conducts stock options appraisals and makes recommendations in line with the scheme of delegation in the constitution. Implements SLT, Cabinet decisions.z Annual report to Cabinet on outcomes including use of proceeds/land.	Considers recommendations and takes decisions on implementation. Agrees a level of delegated authority for action based on agreed principles, process and policy.
Managing progress against delivery of ten year investment plans	Reporting and consideration of progress / corrective action via management – action monthly to Director of Housing, six monthly to SLT.	Receives and approves reports. Takes/approves corrective action where required. Regular monitoring.
Updating stock condition survey information	Annual programme of stock condition to maintain 100% survey every 5 years with regular external validation. Outcomes used inform investment plan and revisions to the AMS and to the Asset Performance Evaluation model.	Results reported for information as required and via annually updated investment plan and approval of revised active asset management strategy.
Updating asset performance evaluation model	Model will be owned and managed to support decision making and it will be updated every year or in response to changes in the stock portfolio (additions, disposals, transfers, investment etc.) and updated stock condition information.	Model outputs reported to Director of Housing, SLT and Portfolio Holder at each update to demonstrate progress in active asset management to improve value.

11. Monitoring and review of this strategy

11.3 – Internal controls

The main internal controls are in the following areas:

• Stock Condition Surveys (SCS)

The costs used in the SCS will be reviewed regularly to ensure they are consistent with sector benchmarks and that a process is in place to ensure they will be updated on a systematic basis based on actual prices obtained for works done and planned.

Updates to the SCS are captured by the asset management databases as the investment programme is implemented. SCS updates will form part of the annual investment planning verification process.

• Investment Plans

There is a planned investment programme in place with clear and robust contract management arrangements.

There are performance measures in place and there is effective and regular monitoring and management of actual delivery performance against these plans by the asset management team. Demand analysis and customer feedback from responsive repairs programmes is used to inform and update the planned investment programmes.

Our resident group will help ensure our investment plans reflect residents' priorities and scrutinise the quality of our delivery.

Repairs and maintenance delivery programmes, including gas servicing, are all in place and there is effective monitoring and management of outcomes.

• Procurement and Staffing

There will be effective and efficient procurement plans and processes in place with value for money confirmed through benchmarking and external validation exercises.

There are management systems in place to recruit, select, train and appraise staff with the skills to deliver the strategy.

• Responsive Repairs

There are detailed contract controls and performance measures in place for the service. Service outcomes and measures are used to inform forward planning of both responsive and planned repairs.

There are good levels of customer satisfaction with the service and this is routinely tested as part of the service.

• Asset Performance Evaluation

The asset performance evaluation model developed by Savills is owned and managed by the Housing Asset Management Team, with input from the Finance and Housing teams.

The Assistant Director of Property Services will ensure that it forms an integral starting point for investment planning and active asset management.

The model will be regularly updated, informed by new information including updated stock condition data following delivery of investment plans, responsive repairs spend, changes in management costs, changes in void rates, local option appraisal outcomes, new homes coming into management etc.

• Asset Management Strategy

The Asset Management Strategy will be updated as a key part of the annual capacity modelling and corporate planning process and outcomes from this exercise will inform the business planning and capacity modelling.

• Business Planning & Capacity Modelling

The annual business plan and capacity model review process will explicitly evidence a golden thread from the business plan through the asset management strategy, cash flow models, investment and procurement programmes, and stock condition surveys etc.

• Internal Audit & Risk Management Arrangements

The actions from the Asset Management strategy will be reported to the Housing Senior Management team and Senior Leadership Team.

The key risks will be reported on the Housing risk register.

This approach aims to ensure we continue to improve our practice and performance, and have consistency from asset model to stock condition survey and make best use of all of the key links in between.

11. Monitoring and review of this strategy

11.4 - Risk Management

This strategy recognises that housing assets can also become liabilities, for example having a negative impact on the organisation's viability as a landlord or on residents' lives. We must be aware of these risks and manage them appropriately.

Risks relating to asset management for the Council include:

- Failures to manage Health and Safety compliance could put residents, staff and contractors at risk
- Failures to meet statutory and regulatory standards can carry penalties and will damage the Council's reputation
- An incorrect scope or poor quality of stock investment will have a key influence on customer satisfaction and, in some areas, on demand for property
- Poor value for money in asset management will impact on our ability to deliver our objectives
- Potential loss of high performing stock through Right to Buy would reduce our contribution to operating surplus
- Failure to meet the standards of engagement with residents, leaseholders and other stakeholders as detailed in the recent white paper would lead to sanctions the regulator and reputational damage.

Cabinet and resident accountability is central to the co-regulation approach proposed in the social housing white paper. We will review our approach to reporting and managing risk in the light of these proposals.

We plan to introduce a high-level risk register specifically for strategic asset management, with major risks included on the corporate risk register. The reporting of these asset management related risks will ensure full visibility and accountability through our governance structures including to residents.

11.5 - Review

The strategy covers a five year period from 2021-2026. Investment plans will be reviewed annually. The strategy will be reviewed in December 2022.



11.6 - Authority and control information

Responsibility for this strategy is with the Assistant Director of Property Services.

Key actions: Monitoring and review

- Review and develop our approach to managing strategic asset management risks
- Review compliance against the Regulator of Social Housing consumer standards in respect of asset management
- Annual review of strategy
- Full update of strategy by 2026.

APPENDIX 1 – ACTION PLAN

	Objective	Actions	Timescale
OUR HOMES			
1	We will consult with residents and seek more information to understand the current and future needs of diverse groups, and assess the impact of current policies and approaches on these groups.	<ul style="list-style-type: none"> • Asset team will lead consultations on future work programmes, zero carbon, building safety to help establish resident priorities, aspirations and concerns. • Develop a clear Resident Engagement Strategy that covers Housing Services with buy-in from relevant stakeholders. • Measure increase in number of engaged residents /number of responses to consultations. • Ensure a clear feedback loop created. 	June 2022 - to establish an approach – ongoing for lifecycle of strategy.
2	Increase engagement with residents through more detailed satisfaction surveys and a systematic approach to gathering and recording feedback – leading to improved resident satisfaction.	<ul style="list-style-type: none"> • Resident Engagement/ Service Improvement will introduce regular satisfaction surveys to understand what is and isn't working (in partnership with contractors). • A suite of satisfaction reports will enable clear understanding of whether the works being undertaken are having a positive impact and delivering as required. • Success will depend on suitable mechanisms for completing, recording and analysing results being in place. 	June 2022 ongoing
3	Establish a resident group as a sub-group of the Resident Participation Panel, specifically focused on monitoring repairs and asset management.	<ul style="list-style-type: none"> • Put residents at the heart of our decision-making and ensure we deliver the service our customers need. • In line with the Resident Engagement Strategy that seeks to widen out the number of current engaged residents and establishes a network of resident groups reporting in to RPP. • Resident group will be recruited and trained as required to ensure they have the skills to make meaningful contributions to service improvement. 	April 2022
4	Develop a Havering 'Investment Standard' in full consultation and co-production with residents.	<ul style="list-style-type: none"> • The Asset team, will work with residents to develop a clear standard, over and above 'Decent Homes', which can be demonstrated to stakeholders and costed in the HRA business plan. This will allow for clear investment planning around an agreed standard and identify capacity in the HRA. • This standard will be published and promoted to tenants. 	January 2023
5	We will build a plan to increase the availability of larger family homes through improvements in: - 1. Re-let times 2. incentives for under-occupiers 3. conversions/extensions 4. acquisitions	<ul style="list-style-type: none"> • The Asset team will work with major works, regeneration and lettings teams to identify suitable opportunities in new build or refurbishments. • We will utilise asset intelligence to identify pipeline opportunities for downsizing, rooftop development and infills. • We will maximise the use of 'right to buy' receipts on acquiring larger homes 	Ongoing

APPENDIX 1 – ACTION PLAN

	Objective	Actions	Timescale
OUR HOMES			
6	We will use our understanding of asset performance to identify additional opportunities for small scale regeneration, alongside a review of land opportunities within our estates, and agree a preferred approach/strategy for sites.	<ul style="list-style-type: none"> The Asset team will establish all HRA assets and identify relevant opportunities, which will feed into the wider regeneration programme. We will assess if a decrease in the numbers of non-sustainable properties can be achieved within our stock. 	January 2024
7	Build a comprehensive asset register including up to date data on all our owned stock and its condition, with links to mapping and existing management systems, (including details of all non-residential assets on our asset register).	<ul style="list-style-type: none"> The Asset team will ensure all assets owned or managed by Housing are recorded on 'Keystone' and managed appropriately. The asset team will work with relevant teams to obtain and update data as required. 	January 2023 / ongoing
8	Improve our response to major disabled adaptations, working with Adult Social Care and Children's Social Care to explore all viable options to meet residents' needs.	<ul style="list-style-type: none"> Asset team will develop an appraisal tool to ensure appropriate properties are being adapted which will meet the long-term needs of residents, and, where necessary, encourage residents to move into more appropriate properties. Ensure our register of adapted properties is up to date on 'Keystone' and linked to 'Open Housing' to inform re-letting. 	June 2023
9	To allow full asset planning, we will improve our understanding of investment needed in mechanical and electrical aspects of our blocks and structural requirements for homes of non-traditional construction.	<ul style="list-style-type: none"> The stock surveying team will undertake a cyclical programme of stock surveys to improve our knowledge base. 	Commence programme in June 2022
10	Understand the range of solutions to improve the thermal efficiency of our dwellings and deliver net-zero carbon and develop a costed delivery strategy.	<ul style="list-style-type: none"> In order to enable us to deliver the government and LBH net-zero carbon objectives by 2040, the Asset team will develop the zero carbon strategy. We will bring average SAP (energy rating) to 'C' by 2030. 	June 2024 (strategy delivery)
11	Develop a systematic approach to evaluate the performance of our garages.	<ul style="list-style-type: none"> To ensure we maximise the potential of all assets, the Asset team will develop a garage investment model. This will provide a clear approach to garage and garage sites. 	January 2023
12	Develop a proactive approach to the management of our shops, the community centre, play areas and office spaces, maximising income while ensuring a viable provision of important community services.	<ul style="list-style-type: none"> The Asset team will ensure all assets owned or managed by Housing are recorded on 'Keystone' and managed appropriately. Asset review may include exploring alternative options where there is low demand. 	January 2023
13	Monitor the drivers for repairs volumes and use this information to inform planned investment.	<ul style="list-style-type: none"> The asset team will monitor all workstreams to identify properties which have high and low numbers of repairs. We will introduce targeted property 'MOTs' to allow us to move from reactive to proactive approaches. This will ensure there is a clear understanding of properties and how this impacts on stock sustainability. 	June 2023

APPENDIX 1 – ACTION PLAN

	Objective	Actions	Timescale
ACTIVE ASSET MANAGEMENT			
14	Develop systems to enable easy updating of data and information on an ongoing basis, allowing us to update our performance model at least every two years.	<ul style="list-style-type: none"> The Asset team will ensure all assets owned or managed by Housing are recorded on 'Keystone' and managed appropriately. Ensure all asset data is up to date and relevant and allows investment modelling. 	Ongoing process
15	Incorporate into our performance assessment the costs to deliver net-zero carbon, and any new requirements on 'Decent Homes 2' and 'Building Safety', as soon as information is available either in the form of new guidance from Government, or as a result of further survey work.	<ul style="list-style-type: none"> The asset team will ensure stock surveys include building safety and zero carbon inspections and will build this into stock appraisals. Ensure investment model includes all upcoming workstreams. The HRA business plan will include all known investment need over 30 years. 	Ongoing process
16	Develop the resources of our team and our approach towards option appraising our stock that meets agreed performance triggers, establishing an options appraisal framework.	<ul style="list-style-type: none"> Regular stock appraisals are undertaken, with the same comparable methodology and agreed outcomes.. 	June 2022
17	Complete a programme of appraisals of poorly performing stock by the end of 2022.	<ul style="list-style-type: none"> The Asset team will develop an appraisal framework. 	Ongoing process once framework is in place
18	Develop a divestment strategy to target major liabilities and release resources for regeneration.	<ul style="list-style-type: none"> To ensure that we retain the most viable stock which meets our tenants current and future needs, the Asset team will develop a clear divestment strategy including appropriate triggers and outcomes (supported by relevant stakeholders). 	January 2023
INVESTMENT PLANNING			
19	Follow our agreed investment planning methodology, and ensure we review and agree on an annual basis a one year, five year and 30 year investment plan.	<ul style="list-style-type: none"> A fully affordable business plan will be maintained which ensures all works to existing stock is included and identifies additional capacity. The Housing Finance team and Asset team will develop annual budgets, 5 year plans and 30 year plans. 	Annually in line with business plan and budget setting timetables
20	Explore commercial opportunities for asset management service provision to others.	<ul style="list-style-type: none"> We will review commercial opportunities to help manage other providers' stock where appropriate. This will potentially deliver more services to our customers through economies of scale and may create additional income streams. 	Ongoing process

APPENDIX 1 – ACTION PLAN

	Objective	Actions	Timescale
REVIEW AND MONITORING			
21	Review and develop our approach to managing strategic asset management risks.	<ul style="list-style-type: none"> Asset team will ensure the risk register reflects asset management risks and they are adequately managed. 	Ongoing process
22	Review compliance against the Regulator for Social Housing ‘consumer standards’ in respect of asset management.	<ul style="list-style-type: none"> The Asset team will ensure our properties meet the relevant regulatory standards. Ensure LBH fully meets the regulatory standards and is not at risk of sanctions. 	Annually
23	Annual review of strategy.	<ul style="list-style-type: none"> The AD of Property Services will review the strategy to ensure it remains in line with corporate objectives and current legislation. 	Annually
24	Full update of strategy by 2026.	<ul style="list-style-type: none"> Housing Strategy & Service Development will assist the AD of Property Services to conduct a full review of this strategy in 2026. 	December 2026

Asset Management strategy (2021-2026)

Equality and Health Impact Assessment (EqHIA)

Document control

Title of activity:	Asset Management strategy (2021-2026)
Lead officer:	Garry Knights, Assistant Director – Property Services
Approved by:	Patrick Odling-Smee, Director of Housing
Authors:	Garry Knights, Assistant Director – Property Services, Joe Agius, Strategy & Policy Officer
Date completed:	26/08/2021
Scheduled date for review:	October, 2022

Did you seek advice from the Corporate Policy & Diversity team?	YES
Did you seek advice from the Public Health team?	YES
Does the EqHIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	NO

1. Equality & Health Impact Assessment checklist

About your activity

1	Title of activity	Asset Management strategy (2021-26)
2	Type of activity	Strategy
3	Scope of activity	<p>This 5-year strategy applies to all Havering residents, Council Members and officers, as it sets out to explain how Housing Services will utilise its housing assets to deliver the best possible quality and value for money.</p> <p>A summary of this strategy will be published and made available free of charge to any person who asks for a copy.</p>
4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes
4b	Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?	Yes
4c	Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?	Yes

Completed by:	Joe Agius, Strategy & Policy officer
Date:	26/08/21

Protected characteristic: Age		
Please tick (✓) the relevant box:		Overall impact: Neutral This strategy does not discriminate on the basis of age . It is anticipated that this strategy will not impact either negatively or positively on the basis of age, as it will be applied in accordance with current equality legislation. The overall impact on age has therefore been assessed as neutral .
Positive		
Neutral	✓	
Negative		

Evidence¹:

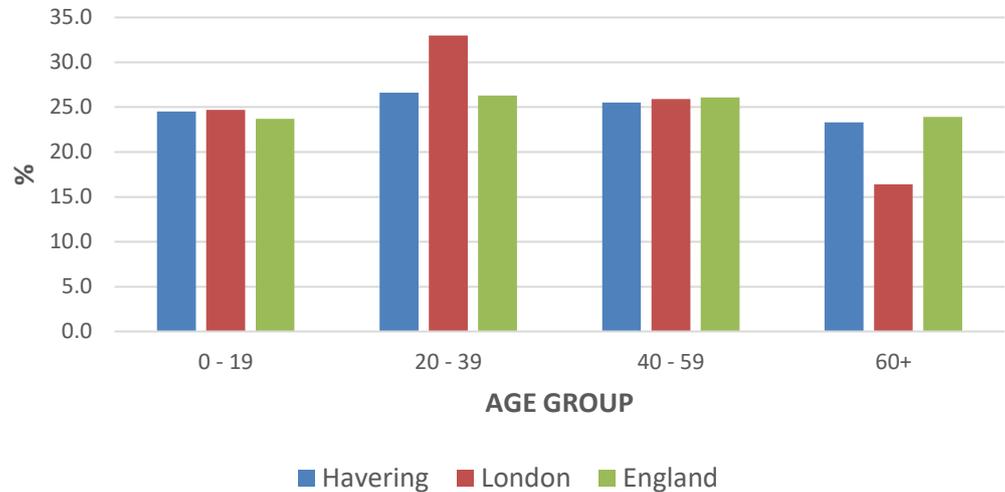
In 2019, Havering recorded an estimated resident population of approximately 259,500 people.

HAVERING			London		England	
Age	Count	%	Count	%	Count	%
0 - 4 yrs	17,367	6.7	606,004	6.8	3,299,637	5.9
5 - 9 yrs	16,824	6.5	602,992	6.7	3,538,206	6.3
10 - 14 yrs	15,570	6.1	537,605	6.0	3,354,246	6.0
15 - 19 yrs	13,864	5.3	467,602	5.2	3,090,232	5.5
SUB-TOTAL	63,625	24.6	2,214,203	24.7	13,282,321	23.7
20 - 24 yrs	14,474	5.6	565,427	6.3	3,487,863	6.2
25 - 29 yrs	17,548	6.8	770,010	8.6	3,801,409	6.8
30 - 34yrs	18,802	7.2	838,109	9.4	3,807,954	6.8
35 - 39 yrs	18,289	7.0	781,520	8.7	3,733,642	6.6
SUB-TOTAL	69,113	26.6	2,955,066	33.0	14,830,868	26.3
40 - 44	16,089	6.2	661,032	7.4	3,414,297	6.1
45 - 49	16,115	6.2	596,614	6.7	3,715,812	6.6
50 - 54	17,477	6.7	567,017	6.3	3,907,461	6.9
55 - 59	16,577	6.4	495,468	5.5	3,670,651	6.5
SUB-TOTAL	66,258	25.5	2,320,131	25.9	14,708,221	26.1
60 - 64	13,847	5.3	391,074	4.4	3,111,835	5.5
65 - 69	11,826	4.6	312,926	3.5	2,796,740	5.0
70 - 74	11,960	4.6	273,546	3.1	2,779,326	4.9
75 - 79	8,453	3.3	193,310	2.2	1,940,686	3.4
80 - 84	6,947	2.7	150,816	1.7	1,439,913	2.6
85+	7,523	2.9	150,917	1.7	1,397,051	2.5
SUB-TOTAL	60,556	23.3	1,472,589	16.4	13,465,551	23.9

¹ Source: haveringdata 2019 (as published in February 2021)/ONS.

TOTAL	259,552	100.0	8,961,989	100.0	56,286,961	100.0
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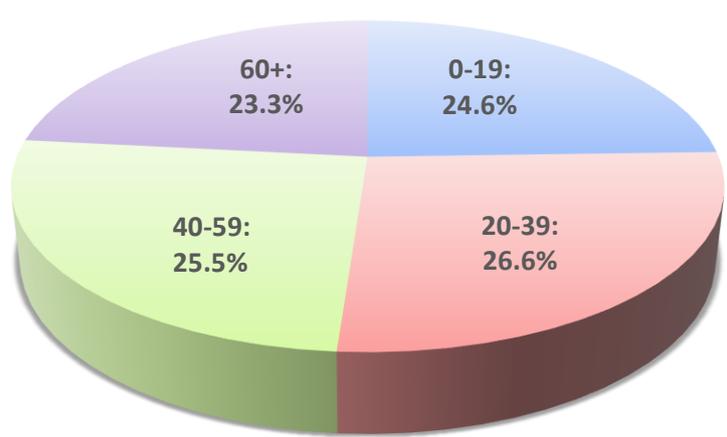
Havering, London and England - Age profile



Havering has a larger 60+ year old population compared to London, and a slightly lower level to England.

Current statistical data would suggest that this is on the decline and, as a result, the four age groups are becoming more evenly distributed:

Havering - Age profile (by age group)



One of the likely reasons for this may be the growing number of younger, out-of-borough households relocating to Havering.

Protected characteristic: Disability		
Please tick (✓) the relevant box:		Overall impact: Neutral This strategy does not discriminate on the basis of disability . It is anticipated that this strategy will not impact negatively or positively on the basis of disability, as it will be applied in accordance with current equality legislation. The overall impact on disability has therefore been assessed as neutral .
Positive		
Neutral	✓	
Negative		

Evidence²:

Approximately 52,800 people (20.3%) of Havering population suffers with a disability, which is slightly lower than London's disabled population (21.3%). Unfortunately, there is currently no evidence relating to the under 18-year olds and the over 64-year olds.

Therefore, Havering's disabled population can be broken down as follows:

MOBILITY IMPAIRMENT		%
Mobility impairment	8,374	89.0
Serious visual impairment	101	1.1
Severe hearing impairment	927	9.9
SUB-TOTAL	9,402	100.0

MENTAL DISABILITY		%
Common disorder	29,625	74.8
Borderline personality disorder	3,760	9.5
Antisocial personality disorder	5,143	13.0
Psychotic disorder	1,090	2.8
SUB-TOTAL	39,618	100.0

LEARNING DISABILITY	3,796	100.0
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SUMMARY		
Physical Disability	9,402	17.8
Mental Disability	39,618	75.0
Learning Disability	3,796	7.2

GRAND TOTAL: 52,816 100.0
 As a % of Havering's population: 20.3%
 As a % of London's population: 2.8%

² Source: PANSI (Projected Adult Needs and Service Information) estimates, as published in February 2021.

Protected characteristic: Sex

Please tick (✓) the relevant box:

Overall impact: Neutral

Positive

This strategy does not discriminate on the basis of **sex**.

Neutral



It is anticipated that this strategy will not impact negatively or positively on the basis of sex, as it will be applied in accordance with current equality legislation.

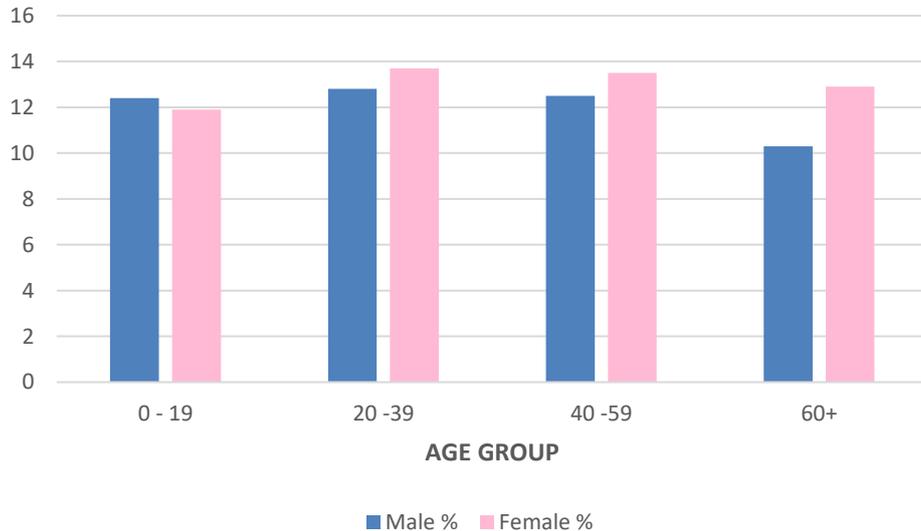
Negative

The overall impact on sex has therefore been assessed as **neutral**.

Evidence³:

In 2019, Havering’s population had a greater proportion of female residents (52%), than male (48%):

Age	Male	%	Female	%	TOTAL	%
0 - 19	32,178	12.4	30,881	11.9	63,059	24.3
20 - 39	33,216	12.8	35,552	13.7	68,508	26.4
40 - 59	32,438	12.5	35,033	13.5	67,470	26.0
60+	26,729	10.3	33,476	12.9	60,464	23.3
TOTALS	124,560	48.0	134,940	52.0	259,500	100.0



³ Source: haveringdata 2019 (as published in February 2021)/ONS, extrapolated to a population of 259,500.

Protected characteristic: Race		
<i>Please tick (✓) the relevant box:</i>		Overall impact: Neutral
Positive	<input type="checkbox"/>	This strategy does not discriminate on the basis of race .
Neutral	<input checked="" type="checkbox"/>	Based upon current evidence (given below), it is anticipated that this strategy will not impact negatively or positively on the basis of race, as it will be applied in accordance with current equality legislation.
Negative	<input type="checkbox"/>	The overall impact on ethnicity/race has therefore been assessed as neutral .

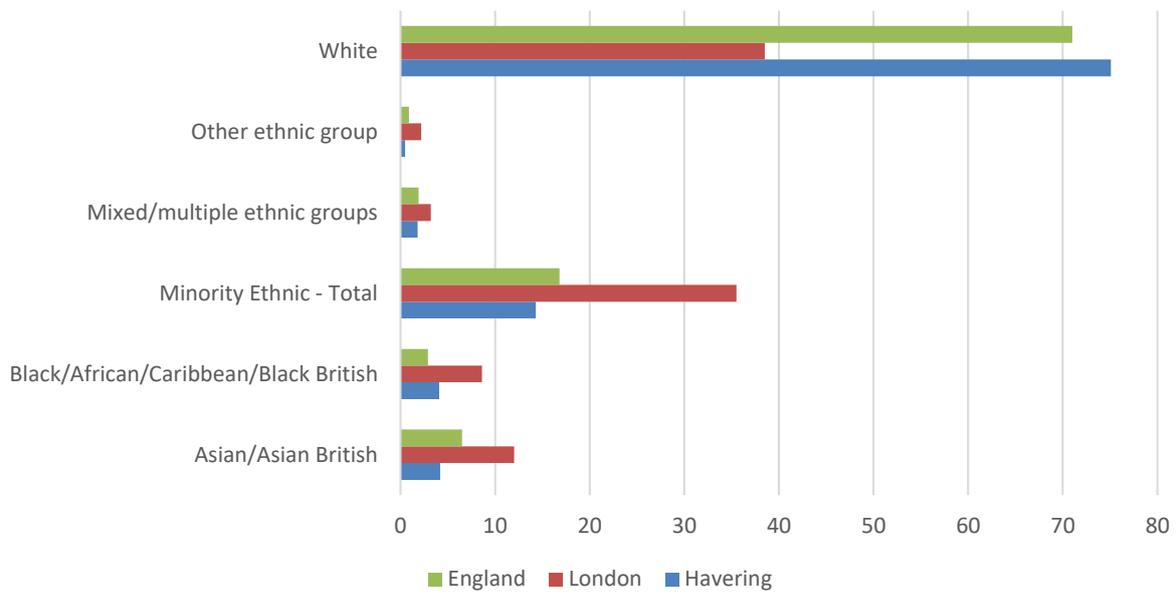
Evidence⁴:

In 2019, Havering was one of the most ethnically homogenous boroughs compared to London and England:

	HAVERING		London		England	
	Count	%	Count	%	Count	%
Asian/Asian British	10,899	4.2	1,511,546	11.9	4,143,403	6.5
Black/African/Caribbean/Black British	10,640	4.1	1,088,640	8.6	1,846,614	2.9
Minority Ethnic - Total	37,109	14.3	4,504,657	35.5	10,733,220	16.8
Mixed/multiple ethnic groups	4,671	1.8	405,279	3.2	1,192,879	1.9
Other ethnic group	1,298	0.5	281,041	2.2	548,418	0.9
White	194,885	75.1	4,887,435	38.5	45,281,142	71.0
	259,500	100.0	12,678,598	100.0	63,745,676	100.0

⁴ Source: haveringdata 2019 (as published in February 2021)/ONS, extrapolated to a population of 259,500.

Havering, London & England - Race breakdown (%)



- Over 92% of Havering's residents are UK-nationals, regardless of race heritage.
- Havering's race composition is changing, with its 'White British' population projected to decrease to 78% by 2032.

Protected characteristic: Religion/belief

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact: Neutral

This strategy does not discriminate on the basis of **religion/belief**.

It is anticipated that this strategy will not impact negatively or positively on the basis of religion/belief, as it will be applied in accordance with current equality legislation.

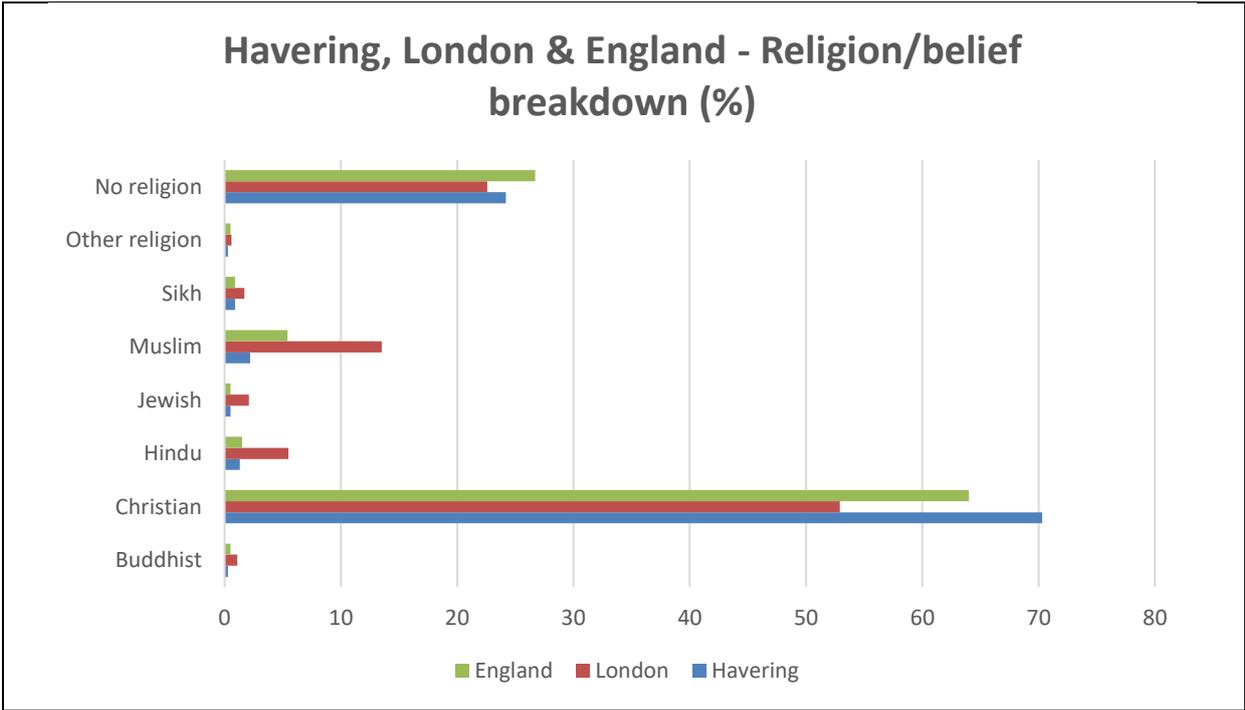
The overall impact on religion/belief has therefore been assessed as **neutral**.

Evidence⁵:

Christianity has the highest religion/belief presence within Havering's population (70.3%), compared to London and England, followed by those with no religious belief (24.2%):

	HAVERING		London		England	
	Count	%	Count	%	Count	%
Buddhist	777	0.3	82,026	1.1	238,626	0.5
Christian	182,429	70.3	3,957,984	52.9	31,479,876	64.0
Hindu	3,374	1.3	411,291	5.5	806,199	1.6
Jewish	1,298	0.5	148,602	2.0	261,282	0.5
Muslim	5,709	2.2	1,012,823	13.5	2,660,116	5.4
Sikh	2,336	0.9	126,134	1.7	420,196	0.9
Other religion	778	0.3	47,970	0.6	227,825	0.5
No religion	62,799	24.2	1,694,372	22.6	13,114,232	26.7
TOTALS	259,500	100.0	7,481,202	100.0	49,208,352	100.0

⁵ Source: haveringdata 2019 (as published in February 2021)/ONS, extrapolated to a population of 259,500.



London has a larger Muslim population, compared to other religions which, given the increasing movement of out-of-borough households into the borough, particularly from East London, is likely to be reflected in Havering’s future religion/belief composition.

Protected characteristic: Sexual orientation

*Please tick (✓)
the relevant box:*

Overall impact: Neutral

Positive

In the absence of supporting evidence, it is not possible to conclude what effect this strategy may have a have in terms of **sexual orientation**.

Neutral



The overall impact on this protected characteristic has therefore been given a **neutral** rating.

Negative

However, any identified issues/needs relating to those with this protected characteristic will be respected and considered on an individual basis.

Evidence:

Supporting evidence is currently unavailable.

Protected characteristic: Gender reassignment

*Please tick (✓)
the relevant box:*

Overall impact: Neutral

Positive

In the absence of supporting evidence, it is not possible to conclude what effect this strategy might have a have in terms of **gender reassignment**.

Neutral



The overall impact on this protected characteristic has therefore been given a **neutral** rating.

Negative

However, any identified issues/needs relating to those with this protected characteristic will be respected and considered on an individual basis.

Evidence:

Supporting evidence is currently unavailable.

Protected characteristic: Marriage/civil partnership

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact: Neutral

This strategy does not discriminate on the basis of **marriage/civil partnership**.

It is anticipated that this strategy will not impact negatively or positively on the basis of marriage/civil partnership, as it will be applied in accordance with current equality legislation.

The overall impact on Marriage/civil partnership has therefore been assessed as **neutral**.

Evidence⁶:

Nearly half of Havering residents are married, and a third are single.

0.2% of Havering’s population consists of a civil partnership relationship.

Havering’s figures are very similar to England as a whole, and, generally lower than London:

	HAVERING		London		England	
	Count	%	Count	%	Count	%
MARRIED (heterosexual marriage)	125,858	48.5	2,608,345	39.8	20,029,369	46.6
CIVIL PARTNERSHIP (same-sex marriage)	519	0.2	27,425	0.5	100,288	0.2
SINGLE (never married, or never registered a same-sex civil partnership)	85,635	33.0	2,888,944	44.1	14,889,928	34.6
DIVORCED (or formerly a same-sex civil partnership which is now legally dissolved)	20,760	8.0	484,106	7.4	3,857,137	9.0
WIDOWED (or surviving partner from a same-sex civil partnership)	20,501	7.9	328,853	5.0	2,971,702	6.9
SEPARATED (but still legally married, or still legally in a same-sex civil partnership)	6,228	2.4	211,500	3.2	1,141,196	2.7
TOTALS:	259,500	100.0	6,549,173	100.0	42,989,620	100.0

⁶ Source: haveringdata 2019 (as published in February 2021)/ONS, extrapolated to a population of 259,500.

Protected characteristic: Pregnancy, maternity and paternity

*Please tick (✓)
the relevant box:*

Overall impact: Neutral

Positive

In the absence of supporting evidence, it is not possible to conclude what effect this strategy may have in terms of **pregnancy, maternity and paternity**.

Neutral



The overall impact on this protected characteristic has therefore been given a **neutral** rating.

Negative

However, any identified issues/needs relating to those with this protected characteristic will be respected and considered on an individual basis.

Evidence:

Supporting evidence is currently unavailable.

Health & Wellbeing	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>
<p>Overall impact: Neutral</p> <p>The Council is committed to the health, safety and well-being of Havering's residents.</p> <p>This strategy is intended to have a positive impact on all residents.</p> <p>However, in the absence of sufficient supporting data at this time, the overall impact on Health & Wellbeing, has been assessed as neutral.</p> <p>Do you consider that a more in-depth Health Impact Assessment is required as a result of this brief assessment? No ✓</p>	
<p>Evidence:</p> <p>Supporting evidence is currently unavailable.</p>	

Review

This EqHIA will be reviewed in October 2022, or as and when:

- new and influential legislation comes into effect, or
- new, relevant data becomes available.

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CABINET	CABINET
Subject Heading:	Private Housing Investment for Settled Homes Proposal for Mercury Land Holdings
Cabinet Member:	Cllr Joshua Chapman – Lead Member for Housing
SLT Lead:	Patrick Odling-Smee, Director of Housing
Report Author and contact details:	Darren Alexander Assistant Director Housing Demand
Policy context:	The policy context is associated with the Council's statutory duty to prevent homelessness
Financial summary:	Over a period of 5 years the Council will fund the Company £59,352,000 through a mix of equity and loan for the purchase of 150 properties throughout Havering. In addition to this funding, the Council will also make a Contingency provision of £2,967,000 to the Company.
Is this a Key Decision?	Yes- Expenditure over £500k
When should this matter be reviewed?	12 months
Reviewing OSC:	Towns and Communities OSC

The subject matter of this report deals with the following Council Objectives

Communities making Havering	[X]
Places making Havering	[X]

Cabinet, 20 October 2021

Opportunities making Havering
Connections making Havering

[]
[]

SUMMARY

1. The Council intends to increase its mixed portfolio of accommodation options in the borough in order to prevent homelessness. The Council's wholly owned company, Mercury Land Holdings limited ("MLH"/the "Company") has the means and opportunity to give the Council access to properties that will provide affordable and better quality than is the case in the open private rented sector market.
2. This report sets out specific Housing Services property requirements associated rental rates to enable MLH to begin property acquisition through the Private Housing Investment for Settled Homes (PHISH).

RECOMMENDATIONS

3. For the reasons set out in this report and its appendices Cabinet is asked to agree that the Council:
 - Acting as Shareholder to MLH, approve the Company Business Case with heads of terms attached at exempt Appendix 1.
 - Enters into a service contract with MLH for the acquisition of assets to house homeless families delegated to the Director of Housing in consultation with Lead Cabinet Member for Housing.
 - Enters into loan agreements at market rate with the Company of up to £62,319,000 including delegating to the Chief Finance Officer, the ability to authorise drawdowns, refinance against the loan facility and approve the terms in consultation with the Lead Cabinet Member for Finance. This is to be in place throughout the duration of the loan in line with the agreement including ensuring appropriate secure charges are registered to protect the Council's interest as lender against each asset purchased.
 - Enters into agreements with MLH whereby the Council HRA provide the relevant support services associated with the management of the assets delegated to the Director of Housing in consultation with Lead Cabinet member for housing.

REPORT DETAIL

4. The Council's Prevention of Homelessness and Rough Sleeping Strategy, adopted by Cabinet in September 2020 set out the objective of reducing the number of households and the overall cost of temporary accommodation (TA). This proposal intends to meet both objectives through MLH's property acquisition and lettings service.
5. MLH will acquire properties from the open market and offer Havering the referral rights for households at risk of homelessness to occupy.

6. This will enable Havering to gradually reduce its Private Sector Lease (PSL) stock where properties are of poorer quality and value for money is no longer achieved. The mix portfolio will also assist in the eventual decant of our two main hostels and shortlife properties which are being released for regeneration purposes.
7. Our Find Your Own scheme yields over 400 properties a year and although it is a hugely successful prevention technique it does not control the market in terms of rent or quality and at times officers are held at the whim of landlords and agents tenant selection process at times over unsuitable accommodation. The council also uses other options to prevent homelessness such as Capital Letters.
8. The previous report “Review of Private Sector Leased Accommodation“ agreed by Cabinet in May 2019 set out the findings of a review of housing and support needs of households living in PSL and recommended a series of actions.
9. It described the Housing Services Department’s needs in terms of accommodation to be sourced and provided through MLH and sets out the basis on which the arrangements would work.
10. For residents in receipt of benefit, changes to the welfare benefit system - such as the Benefits Cap and the Local Housing Allowance (LHA) rates - have significantly reduced the number of properties within affordable reach.
11. LHA is the level at which Housing Benefit and Universal Credit is paid to private renters. LHA rates are calculated for every local area based on local rents. For Havering, those areas are Outer North East London and South West Essex. The maximum amount of support a household can claim will depend on where they live, the number of bedrooms they need, and their income. Most private renters that need their income topped up by housing benefit will face a monthly shortfall between the actual cost of their rent and the support available. Table 1 sets out this shortfall and indication of the direction of travel.

12. Table 1:

Number of Bedrooms	One Bed	Two Bed	Three Bed	Four Bed
2019				
Average monthly rent	£874	£1,111	£1,338	£1,716
Housing Benefit entitlement	£694	£858	£1,082	£1,396
GAP individuals and families need to find each month (average monthly rent – housing benefit entitlement)	£180	£253	£256	£320
Percentage gaps	20%	22%	19%	19%
2020				
Average monthly rent	£896	£1,189	£1,377	£1,802

Housing Benefit entitlement	£694	£858	£1,082	£1,396
GAP individuals and families need to find each month (average monthly rent – housing benefit entitlement)	£180	£253	£256	£320
Percentage gaps	20%	22%	19%	19%
2020 POST COVID 16 March 2020/2021				
Average monthly rent	£896	£1,189	£1,377	£1,802
POST COVID Housing Benefit entitlement (LHA uplift new 30 th percentile)	£898	£1,147	£1,371	£1,725
GAP individuals and families need to find each month (average monthly rent – housing benefit entitlement)	+2	-£42	-£6	-£77
Percentage gaps	0	1%	1%	1%

13. For households accommodated in PSLs, as they are classified as temporary accommodation by the DWP, the amount of Housing Benefit that they are eligible to receive is capped at the 2011 LHA rate less 10%. Rental charges paid to a landlord for a PSL is related closely to the market rent and therefore a significant gap is created which, on average, is in the region of £2,000 per property per year. The government has provided Flexible Homelessness Support Grant to meet this shortfall however there is no certainty that this will be provided in the future, and there is still a newt cost to the council. The PHISH scheme therefore seeks to minimise the risk and provide alternative accommodation that does not have this funding shortfall.

14. Impact of COVID - Unaffordable rents & increased demand

15. For residents in receipt of benefit, rises in local property prices have significantly reduced the number of properties within affordable reach. We know that the inability to afford, or sustain, an assured short hold tenancy (AST) in the private rented sector is a key cause of homelessness. This is not just an issue for people receiving benefits, but also for many in low-paid employment.

16. Since COVID-19, market rents in Havering have slightly reduced, however, there remains a sizable gap between average market rent levels for different bedroom sizes in the private sector and the level of rent that housing benefit will cover. The increase to the Local Housing Allowance (LHA) rates, due to COVID-19, will enable many more households to afford private sector accommodation, however, the details and the duration of this change is still not known, potentially giving a temporary and unrealistic sense of affordability. Taken across the London region, the disparity between monthly rent levels and housing benefit entitlement was greater, resulting in unprecedented affordability issues for inner London authorities.

17. This makes Havering more attractive to other boroughs as an option to house their residents, as it has become a more affordable rental area compared to their own boroughs, and provides an unrealistic view of affordability long-term if the LHA returns to its previous position or is frozen in future years as has been done in the past.

18. Increased unemployment will increase the number of households unable to afford to pay their rents or mortgages and will therefore increase pressure on homelessness. Between July 2020 and November 2020 we started to see a significant increase in applications of homelessness and this rise has remained consistent throughout the remainder of 2020/21.

19. When the council is unable to prevent homelessness then a full duty is accepted and temporary accommodation has to be provided.

	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	YTD
2019-20	155	186	160	195	177	165	187	174	111	233	160	129	2032
2020-21	114	141	165	166	228	269	236	256	175	239	255	292	2536

20. There is demand for settled accommodation and to move households who are currently in hostel and short-life units that need to be decanted for redevelopment – approximately 50 a year. PSL landlords are increasingly ending their leases with the Council as they can get higher rental rates by renting privately (Table 3)

Table 3 – PSL properties handed back - Feb 2020 to August 2021		
Bedroom size	Total	%
1 bedrooms	34	29%
2 bedrooms	47	71%
3 bedrooms	33	
4 bedrooms	5	
Total	119	

21. The Council is currently filling the supply gap by using vacant Council stock as short-life temporary accommodation awaiting demolition as part of its regeneration programmes. However, many of the short-life units will be required for redevelopment over the next 5-6 years and the Council will need a new stable supply to enable it to discharge its homelessness obligations.

22. The Council intend to substitute MLH properties for poorer quality PSL accommodation.

23. Mercury Land Holdings

24. Cabinet approved Mercury Land Holdings (MLH) Limited Business Plan 2020/22 on the 13 February 2019. This included the proposal to acquire and supply properties from the private sector housing market and in turn, would offer the properties to the homeless households approaching the Council for a minimum 1 year AST as part of the diversification of current private sector lease provision and to reduce the reliance on supply through the current PSL scheme. Therefore this presents an opportunity to have a mixed portfolio of temporary accommodation (PSLs) and private options to be let as assured short hold tenancies (AST) in discharge of homelessness duty.

25. MLH has proposed to acquire and deliver 25 units in the first year and 150 over 5 years. Subject to the current homeless demand management model continuing to be effective, there is demand for Havering Council to deliver 125 units a year and will have to diversify its supply options to alleviate the pressures and over-reliance on current PSL Accommodation Scheme.

26. Housing Services' expectations from the scheme are:

- Any grouping of units would be welcomed, as it simplifies management and engagement from a housing management perspective. Any block or site management acquisition, purchase or long lease, where a number of households could be managed would be beneficial.
- Any M&E, heating, lift services provided on site would need clarity on management company, or block management arrangements so that the Head of Property Services can be assured that there will not be any complication for occupants.
- Any converted stock needs to be of a good standard. All units should pass a HHSRS assessment which procurement team will agree. Portfolio acquisition would be suitable.
- Units should be acquired in locations which have public transport, services, schools and shops within reasonable travel distance.
- These properties will not be subject to Right to Buy.
- At the end of the Council's initial contract, the Company, in consultation with the Council, will assess whether to sell the properties on the open market, dispose back to the Council's HRA, or to another registered provider, to repay the Council or refinance for an additional period.

27. The proposal is to purchase 150 houses over a 5-year period where each property will be kept for 5 years and then sold on the open market. This will negate the need for the Council to provide for MRP on the share equity contribution to purchase costs. MLH will be provided with a drawdown lending facility by the Council where equity and senior debt is drawn down for each purchase.

28. MLH will purchase properties on the open market. An allowance has been made for any additional cost to be borne by the Council of bringing a property up to letting standard required by the Council etc. MLH will provide an Assured Shorthold Tenancy for tenants nominated by the Council. Rents will be set at the maximum LHA level for the area. Rent income will go to MLH. The Council will provide a comprehensive management & maintenance service for the properties for which it will receive appropriate allowances from MLH.

29. These will be based on average costs per property typically incurred by the Council on existing PSL stock (including tenant damage), together with an allowance to cover landlord repairs and maintenance costs such as gas servicing, day to day repairs etc. Any costs incurred above the allowance are the responsibility of the Council. The Council will cover rent arrears and void rent loss in excess of the allowance amount (including any Council tax, utility costs etc.).

30. MLH will make provision for any capital improvement costs required during ownership of the property. MLH will insure the properties.

31. Financial Assumptions

	Purchase price	Monthly rent
2 Bed House	£325,000	£1,150
3 Bed House	£375,000	£1,375
4 Bed House	£475,000	£1,730
+ Refurbishment £5k per property 2% inflation uplift added to these figures to bring rents to assumed 2022/23 start point		

32. Annual Council Allowance per property

Property Management Fee	£732.00
Repairs & Maintenance – (Current average)	£856.00
Additional R&M Contribution	£765.00
Arrears - 3.40% of average rent	£153.00
Voids - 3.60% of average rent	£161.00

33. Council Lending Return

21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	Total
£87k	£88k	£88k	£89k	£89k	£5k	£5k	£4k	£4k	£3k	£462k

- PWLB rate 1.96% (8 year rate)

- | |
|-------------------------------------|
| - Rate charged to MLH 3.2% |
| - Senior debt to equity ratio 60:40 |

34. How will Havering Discharge its Duty

35. Mercury Land Holdings (MLH) will make an offer of a private rented sector property with a 12 month Assured Shorthold Tenancy (AST) which can be renewed each year for the full 5 year term. The Council through a nominated discharge of duty protocol, will discharge its main duty to the household and relinquish responsibility after two years.

36. Officers will send a letter to the applicant when making an offer of private rented accommodation, setting out the following:

- a) the duty under which the offer is being made
- b) possible consequences of refusal or acceptance
- c) the right to request a review of the suitability of accommodation
- d) that the Council is satisfied that the accommodation is suitable
- e) that the Council regards itself as ceasing to be subject to its homeless duty.

37. During the first 2 years of a tenancy, the Council will provide support to the applicant to help sustain the tenancy.

38. In the event households continue to reside into the 4th year of the 5 year term they will fall within the agreed move-on policy where the Council will support a move through a range of alternative housing options.

39. Property sale and disposal

40. At the end of the 5 year term the Council will retain the option to purchase the properties at cost through the HRA.

REASONS AND OPTIONS

41. Reasons for the decision:

42. Supply and demand

43. The Council is short of accommodation alternatives and although new demand has been effectively managed through prevention of homelessness, there is an ongoing need for accommodation to continue to meet the housing need of existing homeless households.

44. Currently, the regeneration short-life properties are being used to fill the gap between supply and demand when PSL landlords cancel their lease arrangements

with the Council. However, many of the short-life units will be required for redevelopment over the next 5-6 years. Therefore, the supply sought of PSL properties is needed to continue to meet the housing need of existing households.

45. In order to reduce the reliance on PSL properties with landlords terminating leases at any time, the Council should seek to diversify the sources of supply of both temporary and settled accommodation for homeless households by developing a mixed portfolio of properties at local housing allowance rent levels. Officers should look into different scheme options and develop costed proposals in order to create sufficient alternative supply.
46. The arrival of mix of portfolio properties will also enable households who are either over-crowded or under-occupying their current PSL accommodation to be moved on in order to alleviate overcrowding as well as release much needed larger accommodation for other families who need it.
47. Their support needs should be taken into account when decisions are made about the type of alternative accommodation that is suitable for them in order to keep residents near their support network.

48. Pre-Localism Act households

49. The Council previously identified 145 Pre-Localism Act households who have lived in PSL temporary accommodation for more than 6 years. Those households in the original cohort will be excluded from the MLH scheme with the intention for the Council to continue to offer those remaining PSL residents a social tenancy. Officers will continue to monitor and report back on how this has progressed and when this is complete. The non-duty households should continue to be accommodated in their current accommodation until suitable settled accommodation is secured for them.

50. Other options considered and rejected

51. MLH to purchase and subsequently lease properties to the Council to be used as temporary accommodation
52. We considered the use of these properties as temporary accommodation however, the council have already assessed that the rental value and the housing benefit subsidy deficit would lead to the Council losing out financially.
53. The Council to purchase properties and use them as temporary accommodation
54. This was not a viable option for the Council as it conflicts with the existing Right to buy-back (RTB) programme which is also part of the balanced portfolio on schemes.
55. The Council to work with other investors who provide options to supply accommodation

56. The Council still consider this as a viable option in order to further increase the mixed portfolio profile it requires to meet the housing need and will carry out its due diligence of these offers as and when they arise.

IMPLICATIONS AND RISKS

57. Financial implications and risks:

58. In summary, the PHISH scheme proposes that MLH will purchase 150 houses over a 5-year period. The properties will be kept for 5 years and then sold on the open market.
59. The Council will receive revenue in the form of an allowance for the provision of a chargeable management and maintenance service, in addition to this as stated above, the Council will possibly generate £492k income by facilitating the loan to MLH.
60. Any costs incurred above the allowance are the responsibility of the Council.
61. It is anticipated the scheme is likely to reduce the Council's financial burden of the current rental gap funding requirements, because the rent charged by MLH will not exceed the LHA rate for that area.
62. The February Cabinet agreed a MLH Capital Budget of £59.352m over the next 5 years and we will request a contingency of an additional £3m to be agreed in February 2022 as part of the future capital programme to facilitate this scheme. The properties are purchased by MLH and MLH will receive the rental income.

63. Legal implications and risks:

64. General

65. Members established MLH, a company limited by shares and wholly owned by the Council subject to Part V Local Government and Housing Act 1989 and the Local Authorities (Companies) Order 1995. The company's business is the provision of homes for market rent, sale and if required through compliance with planning obligations the construction of affordable homes. Agreement is sought to approve the business case which affords provision of funding to MLH in the form of either equity or loans, and other support. Delegations are sought to make such decisions and finalise the various documents that will be required to facilitate the above as detailed in the recommendations to this report.
66. The Council has a statutory duty under Section 8 of the Housing Act 1985 to consider housing conditions in its district and the needs of the district with respect to the provision of further housing accommodation.

67. Housing Duty

68. When a family or individual presents to the Council as homeless, the Council has a statutory duty under Part 7 Housing Act 1996 to consider this application and make a decision as to whether the family/ individual is homeless, eligible, in priority need, and not homeless intentionally. If the decision is that these criteria are met, then a duty is owed to that family under section 193 Housing Act 1996 (often referred to as the full housing duty).

69. Once that duty is accepted, the Council must ensure that suitable temporary accommodation is provided pending discharge of the duty. This duty can be discharged in a number of different ways, including via an offer of permanent social housing pursuant to Part 6 Housing Act 1996 or refusals of suitable offers. Section 193(7AA) Housing Act 1996 provides that the acceptance or refusal of a private rented sector offer can discharge the full homelessness duty. To qualify a private rented sector offer has to be the offer of an Assured Shorthold tenancy, by a private sector landlord, and be for a fixed term of at least 12 months. The proposal outlined in this paper, for MLH to acquire properties and then let them to homeless households in discharge of the housing duty, are in line with the statutory provision and lawful. To those individuals or families who accept the offer of a tenancy from MLH the Council will no longer owe a homelessness duty.

70. However, if within 2 years of a private rented sector offer being accepted, the applicant reapplies to the Council for assistance, they will be automatically owed the full housing duty regardless of whether a priority need is still present.

71. Regulated activity

72. Provision of social housing is a regulated activity and requires registration of the organisation as a Registered Provider with the Regulator of Social Housing. MLH is not a Registered Provider of Social Housing. Social Housing is defined in the Housing and Regeneration Act 2008 as either low cost rental accommodation or low cost home ownership accommodation. Section 69 Housing and Regeneration Act 2008 defines low cost rental accommodation as: being made available for rent; the rent is below the market rate; and the accommodation is made available in accordance with rules designed to ensure that it is made available in accordance with rules designed to ensure that it is made available to people whose needs are not adequately served by the commercial housing market.

73. As set out in Table 2 in the report, LHA rates, which is the level at which rent will be charged by MLH on these properties, is within the lowest 30th percentile of market rent and there is currently minimal difference between LHA and market rents. As such at present it is not considered that the proposal comes within the definition of social housing, and is not a regulated activity. However, it is recommended that close scrutiny is given to the rent levels as the matter progresses to ensure that the risk of the activity becoming one that should be regulated.

74. Procurement

75. The Recommendations in the report include provision of services and works caught within the Public Contracts Regulations 2015 (as amended). This provides that where the Council procures, services, supplies or works they must follow the procedures set out in the Regulations. In order to make a direct award of contract the wholly owned Council Company is required to fall within the exemptions contained in Regulation 12. The work undertaken for the Council must be more than 80% of the work undertaken by the Company. The level of control exerted by the Council must be akin to the way the Council controls its internal departments. The Company is wholly owned by the Council and has no private capital participation. These requirements must be met continuously and so must be kept under review if the companies undertake non-Council work. The direct award of these contracts is considered to fall within the Regulation 12 exemption and therefore lawful.

76. Finance Arrangements

77. Section 24 Local Government Act 1988 (LGA 88) provides the Council with the power to provide a wide range of financial assistance to MLH (in respect of privately let housing) including making a grant or loan to it and as MLH is a body corporate the Council may under Section 24 (2)(d) also acquire share or loan capital in it. Privately let housing means any form of rented accommodation provided that is not let by a local authority.

78. If the Council exercise its powers under Section 24 LGA 88 then under Section 25 of the LGA 88 it must obtain the consent of the Secretary of State to do so. The Secretary of State has set out pre-approved consents in the 'General Consents 2010' (July 2011 update). If the circumstances of financial assistance meet one of the criteria in the General Consents then the Secretary of State's consent is given.

79. The current version of the General Consents 2011 contains Consent C. This permits financial assistance to be provided to any person (which includes MLH). The only form of financial assistance which may not be given under Consent C is support through the transfer of land – i.e. at nil or a reduced consideration.

80. If the Council intends to borrow to lend to MLH, Reg 25 Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 (SI 2003/3146) treats the giving of a loan by a local authority to a third party (such as MLH) towards expenditure (e.g. works on a new buildings) as capital expenditure providing that if the local authority itself incurred that expenditure (it borrowed to undertake the works itself) it would treat that expenditure (under proper accounting practices) as capital expenditure. It should be noted that the Council borrowing to lend to MLH in connection with revenue funding is not permitted. Any Council borrowing must comply with prudential borrowing code under **Part 1 Chapter 1 Section 1 Local Government Act 2003**, a local authority may borrow for any purpose relevant to its functions or for "the prudent management of its financial affairs".

81. In relation to entering into the financial arrangements the Council may also rely on Section 1 of the Localism Act 2011 which provides local authorities with the power to do anything that an individual may do subject to a number of limitations (this is referred to as the **General Power**). Together with Section 111 Local Government

Act 1972, which provides the Council with the power to do anything whether or not involving the expenditure, borrowing or lending of money or the acquisition of property rights which is incidental, conducive or calculated to facilitate the exercise of any of their functions. This would include the exercise of functions under Section 24 and 25 LGA 88 together with Section 1 Localism Act 2011. The Council could rely on these powers to provide the Company with loans and other support such as providing staff and the use of premises. Any support provided must be state subsidy control compliant and will be the subject of agreements between the Council and MLH.

82. State Subsidy Control

83. The Trade and Cooperation Agreement between the European Union and the UK (TCA) sets out the parameters for giving financial assistance or offering guarantees to 'economic actors' from public resources being generally prohibited if it is selective, confers an economic advantage and has or could have an effect on trade or investment between the UK and EU. TCA therefore requires the United Kingdom to adopt a subsidy control system in order to prevent grantors, that is governments and public bodies, from providing harmful subsidies to businesses.

84. It is important that any loans/credit/guarantee or other support provided to MLH are UK subsidy control compliant. Loans/credit/guarantees which the Council generally makes available to MLH for market housing must be made on commercial terms and at a commercial interest rate or where the Council is acting like any usual market investor. It will be necessary for the Council to obtain independent confirmation that such arrangements have been made on commercial terms prior to them being entered into including taking usual securities over land/assets under usual market conditions.

85. Fiduciary Duties

86. The Council's fiduciary duties could be briefly summarised as it acting as a trustee of tax and public sector income on behalf of its rate and tax payers. The Council in effect holds money but does not own it; it spends money on behalf of its business rate and Council-tax payers.

87. In making decisions concerning MLH, the Council considers whether making investment and/or extending loans to that body (and similar activities) should give proper consideration to the risks and rewards of approving the recommendations. In practice Members will want to consider whether the Council will achieve an appropriate return for its risk and that the Council has minimised the risk and potential cost to it if the Company were to become insolvent and/or defaulted on its loan(s).

88. Consideration should also be given to whether the Council's involvement in this arrangement is proportionate and properly balanced against the anticipated benefit as well as the wider interest of its local business rate and council tax payers. On a practical basis this means that Members should consider whether the monies that they are requested to approve for lending could be better used by the Council for

the wider interests of its local tax payers. This should include considering the impact on the Council (and therefore its local tax payers) if the Company became insolvent or otherwise defaulted on loans it had taken from the Council.

89. Human Resources implications and risks:

90. The recommendations made in this report do not give rise to any identifiable HR risks or implications that would affect either the Council or its workforce.

91. Equalities implications and risks:

92. The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have 'due regard' to:

- i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- ii) The need to advance equality of opportunity between persons who share protected characteristics¹ and those who do not, and;
- iii) Foster good relations between those who have protected characteristics and those who do not.

93. The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce.

94. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants. The scheme will benefit households at risk of homelessness by providing good quality, affordable housing. Households with protected characteristics are over-represented as homeless and therefore this scheme will have a positive impact on those groups.

95. Health and Wellbeing implications and Risks

96. It is anticipated that the implementation of this proposal and its subsequent delivery of better quality properties will generate positive health and wellbeing benefits to directly to households who have a need to be accommodated by the Council.

BACKGROUND PAPERS

Appendix 1 – MLH Business case (exempt)

¹ 'Protected characteristics' are age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex/gender, and sexual orientation.

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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