

## Cabinet Member Report

**Date:** 21<sup>st</sup> March 2011

**Subject:** Social Housing Supply and Allocation 2011/12

### Summary

This annual report reviews the demand for and supply of social rented housing and low-cost home ownership in 2010/11, and considers supply and demand projections for 2011/12.

The report also makes proposals for the allocation of the supply of social housing in 2011/12 to meet the Council's statutory obligations, meet the varying demands for social housing and to reduce the numbers of people living in Temporary Accommodation who are waiting for social housing.

In particular the report sets out:

- Projected supply and the proposed allocation of social housing for 2011/12.
- An update on the supply of future temporary and social housing
- The continued focus on measures to reduce instances of homelessness and reduce levels of Temporary Accommodation (TA)
- Proposed amendments to the Housing Allocations Scheme to in light of changes in Government policy; in particular to introduce increased priorities for working households, those with long-standing local residency, together with changes to allocations for homeless households and the use of the Family Quota

### Recommendations

- (i) The projected supply and proposed allocation of rented housing, as discussed in paragraph 3.1 and set out in Appendices A, B and B1, be noted
- (ii) The recommendations made in paragraph 5.1 are included in the Council's Allocations Scheme
- (iii) A change is recommended to the City Council's allocations policy for intermediate housing opportunities located in Westminster. The change is recommended to give the 380 family quota applicants on the waiting list for a council property a higher preference for intermediate homes when the family quota scheme ends in April 2011.



City of Westminster

## Cabinet Member Report

Date:	21 <sup>st</sup> March 2011
Classification:	FOR GENERAL RELEASE
Title of Report:	Supply and Allocation of Social Housing and Low Cost Home Ownership 2011/12
Report of:	Director of Housing
Wards involved:	All
Policy context:	To promote the quality of life for Westminster citizens by working with all our partners to improve the housing experience of our residents and the safety and social care of vulnerable people and their families
Financial summary:	The proposals set out in this report are contained within the budget provisions for 2011/12. In particular the gross Housing General Fund homelessness budget for 2011/12 is £56.2 m and includes £49.2 m for the provision of temporary accommodation. The net budget for homelessness is £3.1 m and for temporary accommodation is £4.6 m
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## **1. Background Information**

- 1.1 The supply and allocation of social housing report is published in March each year and reviews the demand for and supply of social rented housing and low-cost home ownership in current year, and considers supply and demand projections for the following year.
- 1.2 The report also makes proposals for the allocation of the supply of social housing in 2011/12 to meet the Council's statutory obligations, meet the varying demands for social housing and reduce the numbers of people living in temporary accommodation.
- 1.3 In particular the report sets out:
  - Projected supply and the proposed allocation of social housing for 2011/12.
  - An update on the supply of future temporary and social housing.
  - A description of progress made on meeting overcrowding targets, in particular initiatives to meet the needs of the most severely overcrowded households
  - Proposed amendments to the Housing Allocations Scheme to in light of changes in Government policy; in particular to introduce increased priorities for working households, those with long-standing local residency, together with changes to allocations for homeless households and the use of the Family Quota
  - The initiatives in place to reduce levels of rough sleeping and meet the needs of vulnerable tenants.
- 1.4 The Housing Panel Allocations Working Group met in December 2010 and has provided valuable feedback on supply and allocation of social housing, in particular the support for the continuation of initiatives to address overcrowding and the need to maximise the supply of affordable housing.
- 1.5 In January 2011 The Housing and Community Services Policy and Scrutiny Committee considered the priorities to be included in the 2011/12 Supply and Allocation of Social Housing report and in particular supported the proposed amendments to the Allocations Scheme and initiatives to reduce Temporary Accommodation and rough sleeping.

## **2. Recommendations**

It is recommended that:

- (i) The projected supply and proposed allocation of rented housing, as discussed in paragraph 3.1 and set out in Appendices A, B and B1, be noted
- (ii) The recommendations made in paragraph 5.1 are included in the Council's Allocations Scheme
- (iii) A change is recommended to the City Council's allocations policy for intermediate housing opportunities located in Westminster. The change is recommended to give the 380 family quota applicants on the waiting list for a council property a higher preference for intermediate homes when the family quota scheme ends in April 2011.

### 3. Social Rented Housing Supply and Allocation Projections

3.1 The following table summarises the position regarding the demand for and allocation of social rented housing over the past three years.

<b>Demand Profile</b>	<b>31.3.08</b>	<b>31.3.09</b>	<b>31.3.10</b>	<b>31.2.11 (y.t.d)</b>
Homelessness Applications (p.a.)	1380	1153	1125	1058
Homelessness Acceptances (p.a.)	522	446	378	387
Households in Temporary Accommodation (Total)	2875	2454	2041	1749
• Bed and Breakfast	240	361	115	175
• Stage 2	774	261	475	578
• Private Sector Leasing	1861	1655	1353	966
Category A Transfer Applicants	60	58	46	76
Family Quota Applicants	528	302	405	384
<b>Allocation Profile</b>	<b>31.3.08</b>	<b>31.3.09</b>	<b>31.3.10</b>	<b>31.12.10 (y.t.d)</b>
Homeless Households	452	498	557	551
Tenant Transfers (includes: Category A, Overcrowded and Management Transfer)	97	140	124	123
Family Quota	80	60	63	31
Children Act Panel	14	13	16	9

#### 3.2 Demand for Social Housing

3.2.1 The demand for social housing in Westminster continues to outstrip the supply of available accommodation to let, whether as a result of homelessness, overcrowding, priority needs or demand from vulnerable groups. This is particularly the case for units of two bedroom or larger, reflecting the make-up of Westminster's social housing stock.

3.2.2 Applications from households, who are either homeless or threatened with homelessness, have increased slightly during 2010/11 in comparison with the numbers received in 2009/10 but overall demand is significantly lower than in previous years. However even these reduced numbers of homeless households outstrip the supply of new affordable housing.

3.2.3 All social housing is let according to the authority's Housing Allocation scheme.

### 3.3 Supply Projections

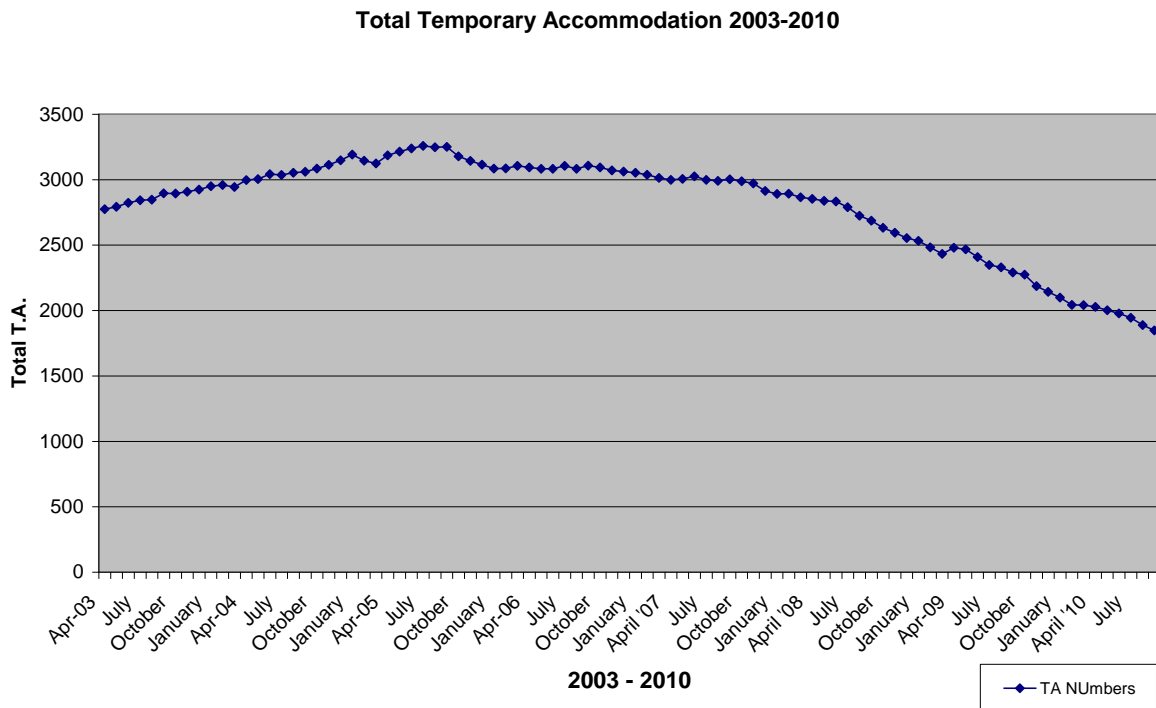
- 3.3.1 The projected total supply of lettings of affordable accommodation for 2011/12 is 927 a decrease of 84 in the total number of lettings forecast for 2010/11, reflecting lower levels of new housing development.
- 3.3.2 The number of new affordable units projected to be delivered for the next 2 years is 51 rented and 69 intermediate homes in 2011/12 and 80 rented and 37 Intermediate homes in 2012/13. These projections are based upon affordable housing developments that are currently under construction or have secured planning permission and are due to commence building works shortly.
- 3.3.3 While the majority of the City Council's new affordable housing supply in 2011/2012 and 2013/2014 will be delivered on S106 sites as part of private led residential developments, Westminster anticipates in the region of 1,500 new homes to be delivered over the next 5 to 15 years on Housing Renewal and Community Build sites
- 3.3.4 The City Council has identified 5 key Housing Renewal Areas at Church Street, Westbourne, Tollgate, Brunel and Ebury Bridge Estates were the majority of this new Council housing supply will be delivered. In the Church Street and Tollgate Renewal areas a series of options have already been worked up for consultation , while other Renewal Areas are at a earlier master planning stage
- 3.3.5 Westminster Community Homes will continue to bring forward smaller infill opportunities on the Council's Land and Estates to provide affordable housing opportunities. These opportunities will be in addition to schemes at Warwick Under crofts , Avenue Gardens , Gloucester Terrace and John Aird Court where affordable housing developments have already been delivered or are currently under way
- 3.3.6 As part of the reforms to the Housing Revenue Account, the City Council will have more flexibilities in delivering new housing from 2012. The Homes and Communities Agency will be encouraging Local Authorities to bid directly for grant funding to deliver new affordable housing supply as part of these new flexibilities, and is currently in discussions with Communities and Local Government about Council 's being able to charge higher rents on both new affordable supply and a proportion of relets to existing stock in order to secure grant

### 3.4 Temporary Accommodation

The Housing Options Service (HOS) provides the Council's statutory housing assessment and advice function. Local authorities have a statutory duty to provide housing under homelessness legislation, where the applicant is homeless and is in priority need and has a local connection. When the supply of suitable affordable accommodation is not available, the Council is required to

procure Temporary Accommodation (TA) to provide housing until affordable housing is available.

Since 2004 the City Council has through better gate keeping and increased prevention activity been working towards reducing Temporary Accommodation (TA). The reduction in TA numbers over recent years can be seen below highlighting that levels have reduced from over 3100 to the currently 1749.



### 3.4.1 Estimates of the future demand for Temporary Accommodation

The following section sets out the factors that will impact upon the future levels of TA and estimates how this will impact upon numbers and size of units of TA needed in the future.

### 3.4.2 Current Demand Profile

The reduction in TA can be accounted for by new acceptances having been well exceeded by homeless rehousing and by accepted cases being placed in the private sector by way of qualifying offers. A number of households also move out of TA of their accord.

### 3.4.3 Current and proposed HB changes

In April the previous Government imposed a cap of £500pw for all private sector temporary accommodation properties.

The June Emergency Budget proposed a series of changes to Housing Benefit and subsequently confirmed the following from April 2011 for new applicants and

from 2012 for existing claimants the introduction of caps on the Local Housing Allowance (LHA) rate based on property size.

- £250 a week for a 1 bed unit
- £290 a week for a 2 bed unit
- £340 a week for a 3 bed unit
- £400 a week for a 4 bed or larger unit

The changes in HB and the introduction of caps described above will impact on the level of demand and the aim of the following paragraphs is to set out the implications of this.

### 3.4.4 Private rented sector demand

The thinking behind the Housing Benefit cap is that households on low incomes who want to live in the private rented sector should seek housing in areas where rents are below the cap levels. Having identified how the level of impact is greater in Westminster than other boroughs, the following table sets out the number of households by bedsize in the private sector in receipt of Housing Benefit where rents are higher than the cap levels in February 2011:

HB Claim Anniversary Date	HB Loss in £'s per Week														Grand Total
	0-50	51-100	101-150	151-200	201-250	251-300	301-350	351-400	401-450	451-500	501-750	751-1000	1001-1500	1501-2000	
JUL-10	1														1
NOV-10		2	1												3
DEC-10	1	1			1										3
JAN-11			1					1							2
FEB-11	2	14	3		4										23
MAR-11	18	111	14	20	42	4	4	4	22		7		2		248
APR-11	51	173	16	62	5	8	4	21	2	1	7	1	3		354
MAY-11	56	189	13	83	3	6	9	29	3		3	1	1		396
JUN-11	58	218	24	73	4	3	7	37			6		1	3	434
JUL-11	70	203	22	35	67	8	6	17	18		6		1		453
AUG-11	60	236	16	39	61	2	6	36	1	1	6	1		1	466
SEP-11	58	223	11	33	75	6	10	9	42		11	2			480
OCT-11	52	205	22	40	72	5	7	12	35	2	8			1	461
NOV-11	56	85	142	31	96	5	5	6	39		7	1	2		475
DEC-11	54	101	120	28	80	2	1	8	18	18	10	2	1	2	445
JAN-12	48	58	151	29	42	31	1	10	20		8	1	2	2	403
FEB-12	56	65	157	28	55	29	7	8	30	9	10	2	2	2	460
MAR-12	8	47	7	10	16	2		2	11		1	1	1		106
#N/A		1													1
Grand Total	649	1932	720	511	623	111	67	199	242	31	90	12	16	11	5214



It is not yet clear (and is unlikely to become so for some time as the market responds to the cap levels) what the general response from landlords will be to the cap, whether to reduce rents to the cap levels, sell the property or retain existing rent levels and seek non HB tenants (having in many cases improved the quality of accommodation.)

### 3.4.5 Homeless Rehousing

The decision to prioritise homeless rehousing during the first part of 2010/11 was driven by the need to reduce TA levels. Given the likely pressures on homeless acceptances during 2011/12 and 2012/13 and the need to reduce resources the percentage of total rehousing made available to homeless households (currently c. 73%) are to be retained, in particular for larger units.

### 3.4.6 Temporary Accommodation Level Forecasts

These assumptions together with others relating to reductions in the principal causes of homelessness and the reduced ability to use the in borough private rented sector as a prevention option for households on benefits are reflected in the following table that describes the impact on TA levels which will increase during the first year following the caps, return to current levels by year 3 and reduce further in year 4.

<b>Assumptions based on current activity</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>
TA level	1729	2034	2009	1724
Acceptances	400	400	400	400
Rehousing	450	450	450	450
Leave TA of own accord	125	125	125	125
<b>Assumptions increasing demand</b>	<b>480</b>	<b>330</b>	<b>190</b>	<b>170</b>
<b>Assumptions reducing demand</b>	<b>0</b>	<b>180</b>	<b>300</b>	<b>400</b>
<b>Closing TA</b>	<b>2034</b>	<b>2009</b>	<b>1724</b>	<b>1419</b>

Essentially this means that homeless acceptances are forecast to increase by 480 in the first year following the changes to Housing Benefit levels. This represents less than 10% of households who are impacted by the changes but does mean that total acceptances double from current levels. This increase will reduce to 150 in year 2 and by 2013/14 demand forecasts reduce by 110.

### 3.4.7 Information Management

Whilst grounded in long term experience of managing homelessness the above figures are estimates and emerging trends, in particular on the numbers and demographics of enquiries to HOS, homeless applications and acceptances will need constant and close scrutiny to ensure the Council is targeting resources appropriately. To deliver this weekly reports are now being produced to cover numbers of:

- Approaches to Housing Options
- Homeless applications
- Homeless acceptances including the reasons for homelessness and the composition of the household
- Homeless rehosings each week

Many of the calculations above are based on assumptions regarding reductions in the numbers of Housing Benefit claims. In order to be able to tie in the changes in homeless applications to changes in Housing Benefit claims Housing Benefit services will provide monthly data on numbers of claims in payment.

These are then analysed by:

- Difference between cap levels and LHA award
- Location by ward of claimants
- Size of property

This analysis will allow comparison to be made between homeless applications and acceptances as a result of loss of private rented sector tenancies and the level of Housing Benefit claims.

### 3.4.8 Supply of Temporary Accommodation

There are four principal suppliers of Temporary Accommodation: Notting Hill Housing Trust, A2 Dominion, Pathmeads and AJ Bush. In addition there are block booked bed and breakfast units and blocks of self-contained single person accommodation.

Westminster is in negotiation with these principal suppliers of Temporary Accommodation to retain existing provision. These discussions are ongoing, reflecting the landlord's response to the introduction of the £500 TA benefit cap introduced in April. Officers remain confident that the great majority of provision can be retained (with the possible exception of some of the largest units where the caps have been most strongly felt.)

### 3.4.9 New TA Procurement

There are three issues that will require new procurement of TA from 2011:

- The forecast increase in homelessness acceptances following the introduction of Housing Benefit caps
- The current suppliers of TA reducing current supply of TA as lease ends are not renewed
- The implications of the HB caps being applied to TA procurement from 2013

To respond to this, three organisations are being engaged to expand levels of TA:

- Expanding the AJ Bush contract (whilst reducing one bedroom property numbers)
- Engaging Orchard and Shipman (who have been contracted to identify prevention units) to procure new units of TA up to a total of 250
- Delivering added value to the HOS prevention structures RMG will procure new units of TA

### 3.4.10 Allocation of Temporary Accommodation

Section 208 of the Housing Act 1996 requires the Council to discharge its housing functions (which includes temporary and section 193 accommodation) in their district 'so far as reasonably practicable.' As a result TA will continue to be secured in borough as far as reasonably practicable, reflecting that the current funding framework of TA is based upon each households individual financial circumstances which in practice means that the great majority of households claim Housing Benefit.

This strategy predicts future demand to 2014 based upon past levels of demand combined with an assessment of whether anticipated future events will lead to a change in demand over the relevant period. This has been accompanied by an analysis of the expected availability of future accommodation within borough following the introduction of the caps. The policy of placing households in suitable temporary accommodation based upon CLG guidance will continue.

### 3.4.11 Homeless prevention

The Housing Options Service has been restructured, making use of additional revenue funding made available by CLG (see 3.4.12 below) for Council's to respond to the introduction of the Housing Benefit caps. In particular this funding can be used to:

- Work with landlords to negotiate lower rents and allow tenants to keep their homes where possible

- The cost of providing additional money advice to private rented sector tenants
- Case work assistance to households moving out or moving into the borough,
- Financial assistance with removal or other expenses
- Targeted outreach support to more vulnerable people affected by the changes
- Additional procurement costs
- Any additional out of borough resettlement costs

In particular the Housing Options service to when working with people who are at risk of losing their privately rented home as a result of the HB cap will ensure potential applicants understand the realities of waiting times for social housing in Westminster and the proposed new tenancy policies and will offer to provide assistance to find private rented sector properties where possible.

The success of this approach relies on the work of skilled and experienced advisors at the Housing Options Service. Officers are confident that based on current projections that the existing resources within the Housing Options Service and making full use of the additional resources secured from CLG (see below) will enable HOS to respond to the increased activity during the period when housing advice requests and homeless applications are forecast to increase.

Housing Benefit services have begun writing to each claimant setting out the implications of the changes to HB cap levels on each individual claim and the potential options. This will very likely lead to a large number of enquiries to Housing Options Service about their future housing options.

#### 3.4.12 Homeless Prevention Grant

CLG has allocated £900,000 as part of the Homelessness Grant allocation to assist with managing the impact of the benefit changes

The increased homeless prevention grant allocation reflects CLG's view that to prevent an increase in homelessness and its associated costs requires additional resources for local authorities. This reflects the bidding exercise completed in November when authorities were asked to set out their requirements to manage the impact of the Housing Benefit caps. Westminster bid for £1.6m and received £900K, a far higher allocation than any other authority. As a result Westminster's Homeless Prevention Grant allocation at £8.3m is over £6m more than any other borough and is 20% of London's total allocation. This reflects the impact of rough sleeping in Westminster and the numbers of households affected by the Housing Benefit caps (but other boroughs consistently raise the issue of the distribution of the grant as being unreasonable.) The increased grant funding is required to deliver the projections set out above. In particular the financial planning around the impact of the Housing Benefit caps.

## **4. Service Issues that impact upon the supply and allocation of housing**

### **4.1 Affordable Rent Tenure**

- 4.1.1 Affordable Rent is part of a package of measures announced by the Government which will be taken forward through the Localism Bill to create a more flexible social sector. It is also part of a new funding regime for social housing development.
- 4.1.2 From 2011/12, Registered Providers of Social Housing (RPs) will be able to convert vacant social rented properties to Affordable Rent at a rent level of up to 80% of local market rent levels for an equivalent property for that size and location. The Homes and Communities Agency (HCA), the government body responsible for allocating funding for social housing is currently inviting RPs to submit proposals to them for the delivery of new affordable rent supply in May 2011.
- 4.1.3 Conversion of existing social housing rent voids to these affordable rent levels will be subject to agreement with the Homes and Communities Agency (HCA) based upon the proposals by RP's on how the additional income raised from these higher rents will enable the delivery of new affordable housing supply. Broadly local authorities are expected to support proposals, but there is no ring fencing of the reinvestment from Affordable Rents at borough level, although providers are encouraged to reinvest in new supply in the same wider housing market area i.e. London.
- 4.1.4 Affordable Rent tenancies will have a fixed tenancy period of 2 years as a minimum but RPs will have the flexibility to grant longer tenancies. Where an RP decides not to renew a tenancy they will need to give advice and assistance on alternative housing. Affordable Rented housing is anticipated to replace new social housing provision.
- 4.1.5 Affordable Rents will be eligible for Housing Benefit and local authorities will be able to discharge their homelessness duties through an affordable rent tenancy.
- 4.1.6 Though RPs will still be able to provide new affordable housing opportunities at social rents, it is unlikely that the HCA will provide grant funding towards this form of affordable housing tenure in future. The HCA anticipates that new affordable rent programmes partially cross funded from higher rental streams generated by conversions of existing social rent voids to affordable rents will reduce the amount of grant subsidy required to deliver new affordable housing supply.
- 4.1.7 The HCA's national housing investment budget for the four year period 2011-12 to 2014-15 will be £4.5bn and this is anticipated to deliver 150,000 new

affordable homes. The equivalent budget for the previous housing investment programme in 2008-11 was £8.4bn.

- 4.1.8 The HCA is currently inviting RPs to submit proposals to them towards the delivery of new affordable rent supply, with allocations of grant funding unlikely to be announced until July 2011.
- 4.1.9 A number of S106 schemes in the City currently at planning stage where affordable housing is a requirement and which had originally been anticipated to be delivered primarily as social rent will need to be reappraised on the basis of affordable rent.
- 4.1.10 The following section considers the impact of Affordable Rent on the development of new social housing in Westminster.

## **4.2 Changes to funding arrangements for affordable homes/ intermediate products**

- 4.2.1 The Government has published a framework setting out how new affordable housing supply will be developed over the next four years. The framework will significantly impact on the City Council's projections for homes available in the City in both the intermediate housing market sector and the social rented sector.
- 4.2.2 The framework sets out a new approach that is based on allocating public grant to selected four year development programmes (agreed between Registered Providers and the Homes and Communities Agency / London Board) as opposed to the existing system of bidding for grant on a scheme by scheme basis.
- 4.2.3 The key components of development programmes which are most likely to attract funding from the Homes and Communities Agency (HCA) / London Board are:
  - (i) **Offering homes as Affordable Rent:** The HCA has been clear that Affordable Rent is the primary housing product supported by grant and that funding for the development of social rented housing will only be considered in exceptional cases (like replacement homes on regeneration schemes). Affordable rent homes are properties offered on flexible fixed term tenancies for a minimum of two years and with a rent that can be charged at up to 80% of local private market rents. The intention is to encourage Registered Providers to build new homes for Affordable Rent and to use the new flexibilities to convert existing social rented homes, where appropriate, to generate additional revenue and debt serving capacity to back development plans to produce new homes.

(ii) **Requesting modest / minimal grant to make development viable:**

Registered Providers will be expected to supplement HCA grant with other sources of revenue to make their development plans work. This could include capital receipts from disposals of existing social housing stock, converting social rented homes to Shared Ownership sales, and cross subsidising housing products not attracting grant from other revenue. Local authorities are encouraged to consider contributions to enable development programmes, such as using public land for development and adopting flexibility on S106 Agreements.

4.2.4 The changes to the Affordable Homes Programme are still in the early stages of consideration by stakeholders, with the deadline for funding bids for four year investment programmes due 3<sup>rd</sup> May 2011. However early identification of some of the likely challenges for Providers and the City Council are:

(i) **Diminishing opportunities for allocation to social rent homes:** As there will be no grant available to produce new build social rent homes - and with the expectation that Providers are likely to convert a proportion of void social rent homes in the City to other tenures, the future supply of homes from Registered Social Landlords advertised on Choice Based Lettings over the next four years is increasingly likely to become an Affordable Rent offer.

(ii) **Setting rent levels for the Affordable Rent product whilst maintaining affordability for local households:** Westminster is a high value housing market area which means that homes with a rent of up to 80% of private rents could prove unaffordable to applicants in housing need, particularly those needing family size homes. The introduction of the Universal Credit and maximum amount of benefit paid to a household are likely to further restrict affordability for some properties. Providers and local authorities are being encouraged to work together and to be flexible in agreeing rental levels that meet a spectrum of local affordability requirements. This might mean that the majority of Affordable Rent homes are set at a level that is below benefit caps and can be allocated via a system of points based needs on Choice Based Lettings, with a minority of properties that are closer to private market rents being allocated via the City Council's intermediate housing service.

(iii) **Limited subsidy available for low cost home ownership schemes:** There will be no grant funding for Rent to HomeBuy and reduced availability of grant for shared ownership schemes and equity loan products. Grant funding for low cost home ownership is only likely to be approved where the tenure is offered in conjunction with an HCA approved development programme that includes Affordable Rent homes, and in low market value areas where rents are unlikely to be high enough to generate the revenue required to support development plans. Under the new arrangements it will not be possible to produce large numbers of low cost home ownership opportunities in the City

via a specific new build scheme. Home ownership opportunities are likely to be less in number over the four year period, and sourced from a Registered Provider's conversion of social rent homes and future conversion of Affordable Rent homes to shared ownership tenures. At the same time the plans for regeneration schemes set out in paragraph 3.3.4 above will deliver high levels of new supply.

(iv) **No ring-fencing of revenues generated locally to reinvest in new local supply:** Although Providers with agreed development programmes are encouraged to reinvest in new housing supply within the same wider market area as its Affordable Rent stock, the revenue raised from this product will not be ring-fenced for increasing local supply. In the Westminster context this means that the revenue raised from Affordable Rent offered within the City could be used to fund the development of new supply within the wider London area. The HCA has been clear that it will not support local authorities that attempt to apply a ring fence on local Affordable Rent revenues for new supply in borough.

4.2.5 An event was held in March discussing all the issues described above with all the principal Registered Providers in Westminster and the outcome of this will inform the development of Westminster's Affordable Rents Statement.

4.2.6 A focus on new models for delivering affordable homes and product development (with or without public subsidy) has become more important to both increase and diversify Westminster's supply pipeline. The City Council is developing an intermediate housing strategy during 2011 to govern the commissioning of future affordable housing schemes (for either rent or ownership) aimed at the mid-market of households which do not qualify for social rented homes but also cannot afford home ownership.

#### 4.3 Tackling worklessness

4.3.1 Tackling worklessness is a key priority for the City Council and is one of the principles underpinning the Housing Renewal Strategy. The importance of enabling existing and future tenants to gain skills and access employment opportunities is fully recognized.

4.3.2 With changes to the allocations policy for working households and the proposed affordable rent model this is an opportune time to embed our approach into mainstream working, ensuring that households have access to information and guidance on employment and are provided with opportunities to improve their skills and gain access to employment opportunities.



4.3.3 The housing department is involved in commissioning a programme of employment projects which are outlined below and will be seeking to bid for additional resources to expand activity in this area where it is available.

### **Westminster Works**

4.3.4 The Housing sector has played an important role in the LDA funded “Westminster Works on Estates” project. CWH, Peabody, Genesis and Octavia are key delivery partners of the programme, employing advisors, delivering jobs fairs, training front line staff to make referrals, and recruiting people to register onto the programme by way of targeted recruitment on a door to door basis. Performance for this strand of work is outlined below.

<b>Westminster Works on Estates Outputs</b>	<b>April 2009 – December 2010</b>
No of Clients Enrolled	563
6+ hours of Support	290
Nos into employment on leaving the programme	91
Nos into sustainable employment	27
Nos into further job search/training	108
Nos into Volunteering	37
Nos into work placement	17

4.3.5 The LDA funded programme has been the cornerstone of Westminster Works but the funding ends on 31<sup>st</sup> March 2011. Some of the partners involved in Westminster Works have formed a consortium to enable them to bid for any future funding. Such funding opportunities are scheduled to become available later in the year through the Government’s Work Programme. In order to deliver some continuity and maintain a service without the LDA funding the Westminster Works Board has worked with partners and external agencies to provide a “Transition Fund” of £220k for the six months between ending of LDA and possible new funding. Housing Commissioning has contributed £50,000 to this which will deliver an outreach programme on estates through which tenants can access advice, training and employment opportunities. These opportunities will be advertised as part of the communications strategy on changes to the allocations policy. Discussions are ongoing with RSLs on how to sustain this work should future funding not become available.

### **Homelessness Employability and Learning Project**

4.3.6 Another route through which we have focused assistance around employability is to households in temporary accommodation through the HELP delivered by Vital Regeneration. This project has a successful track record in engaging with these households despite their unstable circumstances and this success is recorded below.

4.3.7 The service provides 1-2-1 advice sessions and referrals to training, volunteering, work placement and employment opportunities as well as ESOL, literacy and employment aftercare support. Over the last year HELP has supported 110 TA and 20 Hostel clients to achieve:

- 45 Training outcomes
- 20 Volunteer outcomes
- 20 Employment outcomes

4.3.8 The LAA provided part funding for the last two years but this will cease at end of March 2011. Some funding has been secured to continue the project through 2011/12. The project will continue to work with households in temporary accommodation but will broaden its reach to work with:

- households in the private sector who may need to increase their income to avoid homelessness or having to move.
- adult children of tenants who wish to access intermediate housing but who need to earn more

### **Construction Training Initiative**

4.3.9 Operated by NHHT the Construction and Training Initiative (CTI) provides training opportunities in the construction industry using RSL development schemes across a 24 London boroughs.

4.3.10 At 31st December 2010 8 Westminster trainees (out of a London wide total of 107 in the scheme) were working towards qualification in the following trades:

<b>Trade</b>	<b>Numbers</b>
Carpentry	1
Electrical	1
Plumbing	2
Bricklaying	1
Plastering	3

### **InComE project**

4.3.11 We are working with Shepherd's Bush Housing Association to explore the possibility of participating in the InComE initiative. This initiative is open to non-dependant adults living in an overcrowded home who are offered support in accessing training and employment. They are offered accommodation in studio flats provided by the participating local authority and given an AST for 2 years.

They are supported by Shepherd's Bush with college and / or their employer. Once they have gained their qualification or employment experience they are then supported to find independent accommodation.

#### 4.4 Overcrowding

4.4.1 There are approximately 1,000 council tenants currently registered for a move to a larger property.

4.4.2 We have had a number of initiatives in place for the past few years aimed at addressing the problem of overcrowding, including:

- De-converting and extending a small number of homes to create larger dwellings;
- Encouraging under-occupying households to move out of their homes to make them available for larger households in housing need;
- Awarding extra points to the most overcrowded households to prioritise them for a move into a suitably-sized home;
- Increasing the proportion of larger family-sized homes developed within the new supply programme;
- Providing homework clubs and other activities for children in overcrowded families, to minimise the negative impact of not having enough space at home.
- Engaging a company to assist under occupiers who are moving with everything from decluttering to hanging curtains in their new home.

4.4.3 To the end of February 2011 172 overcrowded households were rehoused into larger homes.

4.4.4 In addition we have been undertaking home visits to the most overcrowded households to develop a tailored action plan for each household, and to inform the range of solutions we develop in the future. The Cash Incentive Scheme has also been revised to improve the offer to under-occupying households and bring forward a greater number of larger homes for re-letting to overcrowded families. To the end of February 2011, 385 overcrowded households have been visited and given tailor made advice and over the last three years over 1600 households have assisted to relieve pressures of overcrowding

#### 4.5 Mental Health and Housing

4.5.2 In Westminster we have developed a wide variety of supported housing services for people who require support to live independently, preventing the need for residential care and inappropriate use of temporary housing. There are currently 372 units of supported housing, ranging from high support 24 hour schemes to semi-independent units with visiting support.

- 4.5.3 Services are jointly commissioned by Housing, Adult Services and NHS Westminster through the Supporting People Commissioning Body. Everyone housed within these services has a case open and allocated to mental health teams and on the Care Programme Approach (CPA.) In addition there are over 550 units of floating support for people living in their own independent accommodation who require support to prevent the loss of tenancy, the majority as a result of mental ill health.
- 4.5.4 Individuals are supported to move from supported housing into independent living along a pathway of care and support in order to prevent future tenancy breakdown and free up supported housing for people who will require this in the future.
- 4.5.5 There is an established Mental Health Service Users Housing Panel. The panel is currently working to establish their role in our contract monitoring process for the 15 providers of supported housing and has already piloted a peer reviewing process in the context of scheme visits..
- 4.5.6 The range of supported housing services has been expanded since the beginning of the Supporting people programme by opening four new mental health schemes and redeveloping a rough sleepers scheme to work with people with low level mental health problems.
- 4.5.7 There is a strong focus on homeless prevention for people with mental health problems where officers act as mediators or negotiators to prevent people from being evicted from their family homes or from their tenancies.
- 4.5.8 Quarterly training on housing issues for CHMT's are held together with guidance on how to address housing issues for people with mental health problems. In addition bi monthly housing surgeries are facilitated which reinforce the information shared at the housing training and allows mental health practitioners specifically to discuss service users' housing needs. Through the JAS service there are housing and mental health specialists who work along side the care coordinators in the CMHTs to facilitate move on and resettlement.
- 4.5.9 We involve all partners in support planning for residents in order to ensure that people experience consistent and co-ordinated care.
- 4.5.10 As part of the pathway of care, mental health services receive an annual quota of independent housing units from the City Council for people with mental health problems living in supported housing who are able to live independently. To support this, a detailed protocol has been established between housing and mental health services. The quota in turn frees up supported housing bed spaces which can then be used for people in hospital or residential care.

4.5.11 Readiness for independent accommodation is assessed robustly by care coordinators and housing providers and then again by the panel that accepts or rejects MSHS quota applications. The panel only accepts applications for people where all parties are agreed about the service user's readiness for independent living. Once accepted onto the quota the panel members liaise closely with the Housing Options Service who have the capacity to restrict and delay bidding where it is felt that a situation has changed and people can be removed from the quota when necessary. Once people have moved there are a range of community support services available including floating support services that are able to support the person through the move, to settling in and establishing themselves in the community and other support provisions including flexi care, befriending and day services.

4.5.12 We have an established mental health referrals panel that works to prevent homelessness and gate keeps all of the mental health placements. The panel where possible avoids using out of borough placements and this is achieved by ensuring that there is a steady flow of people through all of our in borough supported accommodation.

#### 4.6 Housing Strategy for People with Learning Disabilities

Following on from the updated Westminster Housing and Support Strategy for People with Learning Disabilities, an operational Pathway Plan has been agreed which sets out specific targets on a three year plan to deliver the action points of the Westminster LD Housing and Support Plan.

4.6.1 The strategy has links with the Supporting People Strategy, The Housing Business Plan, The Older Persons Housing Strategy and the Mental Health Housing Strategy and the following outcomes have been achieved:

- The Learning Disability Housing Panel continues to manage and monitor placements and voids and to the end of January 2011 there have been 13 positive moves into settled accommodation.
- 5 people have been housed into independent housing so far this financial year including two people from family home and two from supported housing schemes.
- Campus re-provision funding of £540K has enabled one person to move on to shared ownership two bed flat by utilising the grant for adaptations. Further funding from the Campus re-provision grant has been used to develop Johnson Place four units of self contained flats with staff on site 24/7
- 23 units of registered care will be deregistered by May 2011

- Grant application has been made to provide 5 self contained flats with staff on site in Victoria
- The Business Case to develop up to 40 units of accommodation for people with complex needs and Autism in Westminster on the PCT owned Harrow Road site is nearing completion

4.6.2 The Dolphin Sq Foundation have nominated five 2 bed houses for people with learning disabilities in Queens Park Hub. Yarrow will provide housing management and currently WLDP are identifying people placed by Adult Services in out of borough residential care placements or currently inappropriately placed to take up these houses.

4.6.3 Supported housing provision has been realigned into two bandings of high (£200 per person per week) and low (£75 per person per week) into all the supported housing both remodelled and new stock

#### 4.7 Housing and Physical Disability

4.7.1 The CityWest Homes budget for 2010/11 for major adaptations is £500K. In addition, £360K was transferred from DDA for this financial year only to meet the demand and like for like replacements. The current spend on adaptations is £740K as at 28 Feb 2011. Works are prioritised for those tenants who have been assessed as having an urgent and high priority need.

4.7.2 CWH had received 174 major adaptations referrals from April 2010 to February 2011 and 49 minor adaptations requests; of these 146 major adaptations have been reported as practically complete. There have been 8 cancellations and 4 requests on hold awaiting for the client's decision regarding transfers to other adapted properties. There are 68 cases still in progress.

4.7.3 The target set is to complete as many cases as possible with an average of 6 weeks for Urgent works and 12 weeks for High and Standard priority works from date of receipt of OT recommendation to work commencement. This target has been exceeded, with 6 weeks on average for Urgent works and 10 weeks for High and Standard priority works .

4.7.4 The anticipated expenditure level on private sector adaptations (including those RSL adaptations where grant applications are made to the Council) is anticipated to be £950k approximately in 2010/11. A target of approving applications within an average of 16 weeks, set under a Local Area Agreement, is being met.

4.75 A consultation exercise with RSLs about future funding and performance reporting was undertaken and the Council will seek to agree a protocol with RSLs in respect of these matters in 2011/12.

4.7.6 A survey into the user experience of the adaptations process across all tenures was carried out in the latter part of the year and this will be reported on in April 2011.

4.7.7 Adult Services re-tendered the Occupational Therapy contract and a new contract and a new contractor will begin on the 1st April 2011.

#### 4.8 Rough Sleeping and Associated Street Activity

4.8.1 The new Rough Sleeping Strategy 2010/ 13 was published in summer 2010 and builds on the successes of the Building Based Services approach, as evidenced by the reduction in core rough sleepers to below 100 on a single night, sustained for over two years. This is a reduction of over half from highs above 200 in 2004 and 2005. All policies identified in the Strategy have been developed within the framework of the necessity to reduce the level of rough sleeping. The key strategic objectives continue to be to sustain the number of rough sleepers at below 100 and then to as near zero as possible. At the last count in November 2010, 99 core rough sleepers were counted plus 29 individuals from A10 countries who had no recourse to public funds and therefore cannot be accommodated. This confirms that the reduction in the number of rough sleepers is being sustained at under 100 and work is ongoing towards the London Mayor's target of zero rough sleeping across London by 2012.

4.8.2 The first response to an individual rough sleeping is always to seek a diversion or reconnection to their last settled area or area where they have some service, employment or family ties. Day centres and outreach teams give a 'hard sell' on reconnection, where appropriate, and withdraw services in cases where they feel an individual is not taking up a reasonable option. Referring an individual to hostel accommodation in Westminster is in the main only considered in cases where a person has a longer rough sleeping history in Westminster, where they have no ties to any areas, or where they have a legitimate and documented reason why they cannot return to an area. These people will have been met bedded down in Westminster and have been assessed to have support needs that mean they could not be referred to schemes to help them access the private rented sector. Of the 1693 rough sleepers met in Westminster over 2009/10, the majority were successfully given reconnection advice. A further 618 met the broad criteria of having 'support needs and no feasible reconnection options' and were booked into hostels in Westminster. Typical presenting issues include: mental health issues below the severe and enduring level (most typically depression, anxiety, personality disorder (stemming from childhood trauma), self harm), substance misuse (alcohol, crack and heroin etc) family breakdown and

bereavement, hospital and prison discharge, learning difficulties, domestic violence etc and often these issues are in combination. In terms of institutional history: 38% of rough sleepers have been in prison in the past, 11% have a history in care and 5% in the armed forces.

- 4.8.3 The Mayor of London's work overseeing the target to reduce rough sleeping to zero by 2012 has moved onto a focus on those new to rough sleeping with a pilot due to start in April 2011 in which accommodation is provided to facilitate reconnection and prevent a second night sleeping out for new rough sleepers. Westminster are trialing this enhanced way of working from Jan 2011 onwards to ensure any potential problems are identified and a new way of working is developed that will work in Westminster.
- 4.8.4 The wide selection of presenting issues listed above explain the need for the selection of different hostels needed to meet needs effectively. In years gone by hostels tended to be large and 'one size fits all' with minimal gatekeeping. It is now well documented that specialized hostels, in good quality accommodation, gatekept for those in most need, deliver better outcomes and the WCC Rough Sleeping Commissioning Team are responsible for ensuring effective gatekeeping, understanding the profile of needs and ensuring the mix of hostels best meets these needs, remodeling where necessary. At present the hostel pathway includes: short term assessment accommodation, a high support hostel for men with substance misuse issues, mixed accommodation including for couples with high support needs, accommodation for people with mental health issues (below the severe and enduring level), accommodation for older men, accommodation for people with alcohol dependency and challenging behaviour etc and a range of move on accommodation including abstinence accommodation. The pathway will need to be re geared to take account of the planned decommissioning of the last identified building which is not fit for purpose, where it has not been possible to secure capital funding for improvements, This loss of beds will be challenging.
- 4.8.5 The range of hostels in Westminster and the speed at which they move people on (typically within 1 to 2 years) enable the BBS teams to get vulnerable rough sleepers without other options off the streets reasonably quickly, reducing the toll rough sleeping takes on individuals (and in particular their health) and communities. Once in hostels, support is given to address needs with the aim of recovery, building skills and moving on independently and the majority of residents move on to accommodation outside of Westminster., including the Private Rented Sector (PRS). To this end WCC will continue to commission a voluntary sector organisation called Hope Worldwide to deliver 120 units of shared accommodation for the client group.



4.8.6 As well as the emphasis on reconnection and effective accommodation services, the rough sleeping strategy includes a variety of themes including strands to tackle the most long term rough sleepers:

- An intensive case conferencing approach is in place to assist the most long-term, entrenched rough sleepers off the streets. This targeted group are known as the Westminster 150 and every effort is made to find solutions that will enable these individuals to come in doors. All aspects of the lives of the individuals concerned are explored to find creative solutions including personalised budgets. This also includes work to improve cross-border co-operation for this client group, who often move between boroughs on a regular basis. The London Mayor is supporting this model of working across the inner London boroughs.
- Many of the long term group have mental health issues including personality disorders and pilots have commenced to better support workers including rolling out the Department of Health's standard training package on personality disorder and a case discussion clinic with the Waterview (a specialist personality disorder service).

Other strands of work relate to tackling the anti social behavior that can be associated with rough sleeping:

- The City-wide Controlled Drinking Zone continues to be enforced and the teams have supported the introduction of dispersal zones across the borough in response to particular examples of poor behaviour. This enforcement has been enhanced by new legislation ( Sect 27) which empowers the police to exclude individuals from specific area for 24 hours.
- Monthly multi- agency Anti-Social Behaviour meetings continue (attended by the police, BBS, ASBU, SPT, Street Management etc ), specifically targeting rough sleepers and hostel residents and agreeing actions including: warning letters, Acceptable Behaviour Agreements, and ASBOs. The Street Population Team (SPT) is tasked with tackling the behaviour of individuals raised at this meeting. The Rough Sleeping Team also put forward cases for consideration at the new monthly Anti Social Behaviour Action Group meetings, multi agency meetings that seek to address anti social behaviour across the borough.
- A new dedicated team tackling all aspects of anti social behaviour is being created out of the two separate teams currently working with rough sleepers engaged in anti social behaviour or involved with the criminal justice team. The new team will extend the work of the Street Population Team (SPT) which commenced work in February 2008. The team provide a resource to tackle street-based anti social behaviour such as street drinking, substance abuse, begging and sex work, and the team work closely with BBS teams as well as

enforcement agencies including the Met Police Safer Streets Homeless Unit (SSHU). The SPT also work very closely with other Westminster enforcement departments, such as Street Management Teams and Safer Neighbourhood teams to ensure a co-ordinated response. The separate Homeless Criminal Justice Team (HARRT) continue to work with rough sleepers with serious offending histories (which can present barriers to their moving off the street), and achieve excellent outcomes with this particularly challenging group. It is felt that the two remits will fit well together and savings will be achieved by combining teams.

- 4.8.7 The number of foreign nationals on the streets of Westminster with no recourse to public funds is a major challenge and can total up to a third of those on the street. A dedicated project 'Operation Ark' started in April 2010 to reduce rough sleeping among EU Nationals and to date has had success in reducing numbers but flow remains high.
- 4.8.8 Work continues with the newly configured drug and alcohol services to ensure individuals misusing substances have access to appropriate treatment and recovery options. Pathways have been remapped to improve communication and clarity for hostel residents.
- 4.8.9 Work is underway to confront worklessness in the rough sleeping and hostel populations. The project has identified several gaps in service and co-ordinated projects including a literacy strategy, resources for hostel workers and Jobs Fairs.
- 4.8.10 Agencies continue to ensure the effective implementation of the Severe Weather Protocol (SWEPS.) During the 2009 and 2010 extreme weather SWEPS worked very well and we had at one point identified a potential pool of c200 beds in and out of the City of Westminster. Most importantly there have to date been no reported deaths as a consequence of the extreme conditions.
- 4.8.11 Westminster Council are currently consulting publicly on our proposals for a Byelaw to regulate Soup Runs and Rough Sleeping in a designated area in South Westminster. The General Purposes Committee gave authority to proceed with the consultation on 22<sup>nd</sup> February 2011, and it is due to run until 25<sup>th</sup> March. Subject to the responses to the consultation, Westminster will then seek approval to proceed with the byelaw from the Communities and Local Government Department.
- 4.8.12 This is the latest in a raft of attempts that have been made to reduce the burden on the local community from soup runs and rough sleeping, and to reduce the counter-productive over-provision of free food on the streets in this part of Westminster, which the Council and many voluntary sector partners believe actively works against attempts to move people off the streets.

4.9 Funding for homeless hostels

4.9.1 The Council has received allocations totalling £3.26 million from CLG to refurbish hostel stock. The Council is also contributing £695,000 as the interest earned since the beginning of the programme in 2004. The development programme is nearing completion :

The building works at **Centrepoint's 25 Berwick Street** hostel is now completed and the redesigned service is providing supported housing to homeless young people

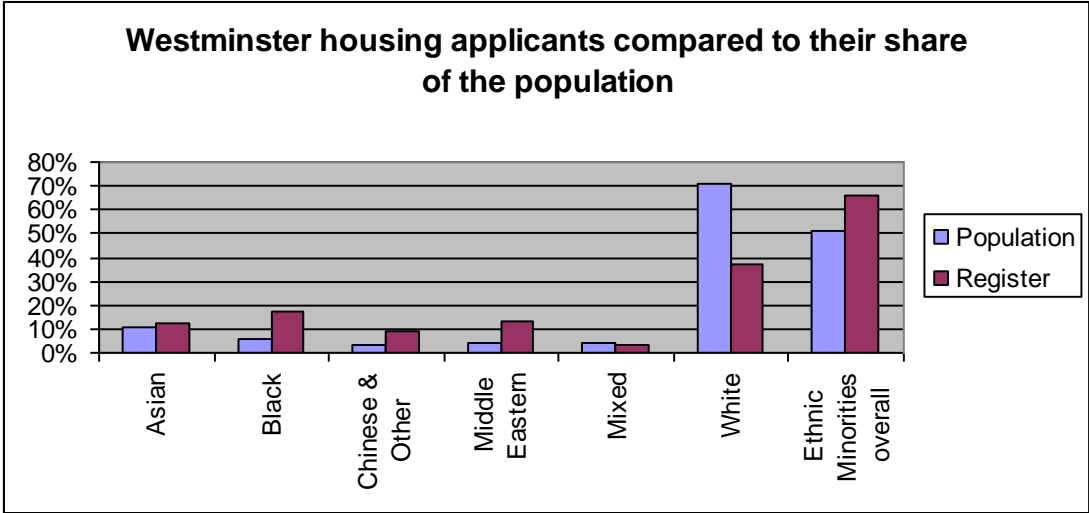
**Passage House, Longmoore Street, SW1.** Formerly the Passage Night Shelter, where half the bed spaces are still in dormitories. Building work is continuing to refurbish the building and remodel the communal and reception areas. Completion of the works is set for November.

4.10 Equality and Diversity

The annual equalities reports looks at access to social housing and housing services and outcomes to ensure they are fair and accessible. Key findings for 2009/10 are:

**Access to housing**

4.10.1 Ethnic minorities continued to have higher levels of housing need than White British households, making up 66% of all those applying for housing compared to their 51% share of the Westminster population. They also have a greater need for larger bedroom properties (3 plus bedrooms).



4.10.2 Black and Middle Eastern groups continued to have the highest levels of housing need, with Black groups making up 17% of all those needing housing compared to a 6% share of the population and Middle Eastern groups making up 13%, compared to an estimated 4% population share.

- 4.10.3 Homelessness is more of an issue for ethnic minority groups, with them making up 77% of the homelessness list. Notably Black Africans and Arabic households are most affected.
- 4.10.4 The majority (51%) of applicants on the housing registers are between, 25-44, which is a slight over representation when compared to their 45% share of the population.
- 4.10.5 The proportion of older people on the housing registers was similar to their share of the population, and they make up only a small proportion (2%) of the homelessness list.
- 4.10.6 Less than 1% of households on the housing registers need a fully wheel chair adapted property which compares with a 2005 housing needs survey estimate of 1% of Westminster's population overall.

### **Housing outcomes**

- 4.10.7 Broadly it is expected that lettings to different groups are compatible with their share on the housing register, although this is dependant both on their level of priority and the availability of properties to meet their needs and aspirations. During 2009/10:
- 4.10.8 67% of lettings were to ethnic minority groups compared with their 66% share of the housing register. A larger proportion were to White groups (43%), compared with their 37% share of the register. This is due to a shortage of larger bedroom units, which some ethnic minority groups have a greater need for. Ethnic minority groups made higher than average numbers of bids per letting
- 4.10.10 Lets to people needing adapted or level access properties were in line or greater than their proportion on the register.

### **4.11 Housing Allocation and Domestic Violence**

- 4.11.1 The introduction of the Multi Agency Risk Assessment Conference for serious cases of domestic violence has strengthened the focus on the links between good housing and homelessness service practice in strengthening the multi-agency response to domestic violence. Case management involves full OHMS database checks to be carried out for all cases as well as further checks with the landlord or housing provider as appropriate. In addition, many cases require ongoing supervision by the MARAC housing representative. This involves attending case conferences and providing email guidance to front line officers dealing with the cases.
- 4.11.2 From a housing perspective, MARAC referrals from housing and homelessness agencies have increased significantly following a series of training sessions delivered to CWH and HOS staff and other awareness-raising work delivered via the Housing / DV Lead Officers meeting and the Supporting People Provider

Forum. During the last quarter, HOS has referred on average 4 cases per month. Other housing agencies, including CWH, RSLs and SP-funded hostels, have referred on average 2.5 cases per month during this period.

4.11.3 During the last twelve months, housing staff at HOS and CWH have received four training sessions specifically on the MARAC and completing risk assessments and the link between domestic violence and child protection issues.

4.11.4 The effectiveness of the response to domestic violence issues continues to be monitored through an annual mystery shopping exercise.

#### 4.12 Supporting People

The following section provides a summary of the Supporting People programme in Westminster (that funds many voluntary sector provided homelessness services) and how the removal of the ring fence from the grant will be managed.

4.12.1 On 1<sup>st</sup> April 2003 funding from a range of sources were transferred by ODPM (now CLG) to a single grant payable to local authorities to implement the SP programme to provide housing and support services to vulnerable people. In Westminster over 4400 people are supported across over 150 housing projects and services including hostels for rough sleepers, sheltered housing for older people, specialist mental health housing services, homes for people with learning disabilities and young persons homeless prevention services.

4.12.2 The level of acute housing related support need presented in Westminster in particular by rough sleepers is unique in the country and to meet this need has required an active partnership between Social Care, Criminal Justice, primary health, Community Protection, housing and homelessness services and the voluntary sector. In order to respond effectively to the demands of the SP regime the City Council has put in place effective local decision-making and planning structures. A comprehensive strategic planning framework is in place and services are commissioned through a joint SP Commissioning Body made up of the City Council's Housing, Adults Services and Children's Departments, the Primary Care Trust, the London Probation Service and the voluntary and Community Sector.

4.12.3 Supporting People has been characterised since 2003 by annual grant announcements that reduced Westminster's grant allocation by £1.5m between 2003-2010 and have not included additional resources for new development or inflationary uplifts. However the December 2007 announcement was of a 3 year settlement for Westminster of £17.05m each year to 2010/11. As part of this Supporting People was paid as a separate ringfenced grant with its own grant conditions stipulating that the grant could only be spent on eligible welfare services. This ring fence has now been removed with from 2011/12 Supporting People grant paid as part of the Council's Formula Grant.

4.12.4 The programme is viewed nationally as an Invest to Save preventative programme and a recent exercise using the national benefits realisation model developed by Cap Gemini and used as part of the Comprehensive Spending Review analysis identified that the spending on Supporting people in Westminster provided a saving to the Westminster of £27m. The grant is used to commission 44 voluntary and community sector agencies to provide services under contracts awarded and approved through the Council's Procurement Code. This follows the 'Strategy for Supporting People Services 2009-13' contract award report approved in 2009 by DCB, CRB and Cabinet member that set out the medium-term procurement strategy for each service. The implementation of this plan and the negotiations with service providers taking place reflect the current economic climate and the need for further efficiencies.

4.12.5 Responding to this challenging financial climate has required a robust approach to managing efficiencies. In total £2.6m of savings will be delivered during 2011/12 through the removal of funding from services that are not strategically relevant or delivered from properties that are no longer fit for purpose, the outcome of competitive tendering and negotiating down contract values.

## **5. New Policy proposals**

### **5.1 Proposed amendments to the Housing Allocation Scheme**

- 5.1.1 The Council is required to have an Allocation Scheme for determining priorities and the procedures to be followed in allocating housing and housing can only be allocated in accordance with the scheme. The 2009 Code of Guidance 'Fair and flexible: statutory guidance on social housing allocations for local authorities in England', and the Government's recently issued consultation paper 'Local decisions: a fairer future for social housing' recommend reviewing allocation schemes.
- 5.1.2 Although councils remain obliged to give reasonable preference to groups seen as in greatest need, and set out in the Housing Act 1996, the code highlighted that they can give extra priority within these groups to, for example, those working or those with local residence. Additionally recent case law has established the position that councils do not have to give cumulative priority to those who have more than one reason for needing housing; e.g. they are both homeless and have a medical need.
- 5.1.3 The current Allocations Scheme is being reviewed. A revised version is being produced and will be presented to the Cabinet Member for Housing for agreement in April 2011.
- 5.1.4 At the same time in November 10 the consultation white paper 'Local decisions a fairer future' was published. The paper proposed a range of reforms to be taken forward through the Localism Bill including the option for local authorities to award Flexible Tenancies for a minimum of two years, rather than secure tenancies for life.
- 5.1.5 In its response to the consultation the City Council indicated that it is likely to let all new council tenancies using the flexible tenancy for a period of two years, with light touch reviews and roll over for households that have circumstances that are unlikely to change. This is with the exception of older people living in sheltered accommodation, households that have been decanted due to regeneration in their area and transferring tenants when they are downsizing.
- 5.1.6 The following policy changes are recommended for inclusion within the Allocations Scheme. If approved, the implementation will involve the positions of all applicants being changed with some moving up and some down their respective housing lists. The intention is that Housing Options will make all the changes resulting from the recommendations below in the first quarter of 2011/12 with a go-live date of 4<sup>th</sup> July 2011.

## 1. Housing Register

There are approximately 11,500 people who are currently registered on the housing register or waiting list for rehousing by WCC. These are people who are not existing tenants of the Council and do not fall into a reasonable preference group set out in the Housing Act and do not meet the Council's threshold for a priority housing group. No-one has been rehoused from this general housing register for many years and the demand from priority groups means that there is no prospect of being housed from the register. The Housing Act 2002 abolished the requirement to hold a register.

Although some indication of the level of housing need, the list is not an accurate reflection of such need as many people will not have registered, being aware that there is no chance of rehousing. Other boroughs, such as LB Barnet are discontinuing their housing register as part of their 'lean review' of processes.

It is proposed to discontinue the general housing register to avoid raising the unrealistic expectation that because a person has been on the list for many years that they will eventually be housed and to save on administrative costs.

In future applicants will be assessed and if they do not meet the Council's priorities for housing, their application will be closed and the applicant notified.

## 2. Choice Based Lettings

When Choice Based Lettings was introduced in November 2004 applicants were put on priority group lists and given points. The groups were arranged in bands set out below;

<b>Band A</b>	Cash Incentive Scheme
	Homeless with extra medical/welfare priority
	Statutory overcrowded households
	Category A medical priority
	Decants/major works transfers
	Community Care
<b>Band B</b>	Tenant Transfers
	Family Quota
<b>Band C</b>	Homeless
<b>Band S</b>	Housing for Older People

A lettings plan which is set out in Appendix B enables the re-housings to each priority group to be controlled.

Officers now believe that the bands add an additional layer of complexity to the scheme which is no longer necessary. In order to simplify the scheme it is



recommended that the current bands are removed and a simpler priority system is adopted based on points and length of time waiting. The proposed new priority groups and points are set out at the end of this section.

Due to the different supply and demand issues for studio and 1-bedroom accommodation and the introduction of a 'Pathways Model' it is proposed to treat family sized accommodation separate to studio and 1-bedroom properties.

It is also proposed that properties identified as wheelchair units (mobility categories 1 and 2) will be withdrawn from Choice Based Lettings and let as direct offers. This is because there is a limited number of wheelchair properties in the borough and applicants registered for this type of property have specific needs.

### **3. Prioritising those in employment**

Although the legal requirement to give reasonable preference to certain groups such as the overcrowded and the homeless remain, there is greater flexibility to give additional priority within these groups to reflect local priorities. Figures from November 2010 suggest that 75% of homeless households and 33% of tenants are currently not in employment. In order to give an extra incentive to take up employment and to recognise the contribution of those who work, it is proposed to give some additional priority to applicants within the homeless and overcrowded priority need groups who have been employed for two years.

This will be done by giving extra points to a working applicant applying on the same day as a non-working applicant with the same priority in order to place them higher on the list. Applicants meeting the employment test can apply to have the points at any point and once given will remain on the application.

It is proposed that applicants must be able to demonstrate that they have been in employment for a minimum of two years. It is also proposed that households in temporary accommodation that have engaged with the Homelessness Employment and Learning Project described above for two years will be eligible for additional worker points.

Priority will be given where the following are met;

- The main applicant or his/her partner must be in employment; and
- Have a contract (permanent or temporary) or be self employed; and
- Have been working continually for a minimum of two years; and
- Work at least 16 hours per week

It will be the responsibility of the applicant to provide proof of their working status and only the originals of official documents such as payslips, P60 or tax returns

will be accepted. Letters on headed paper from an employer will not be acceptable proof.

Existing applicants are to be asked to provide this information between April and 17<sup>th</sup> June 2011 in order that the new points can be applied across all lists by 4<sup>th</sup> July 2011.

#### **4. Local Residence**

There is a perception among some residents that long standing residents lose out to those with less links to Westminster when seeking housing. Although the legal requirement to give reasonable preference to certain groups such as the overcrowded and the homeless remain, the greater flexibility to reflect local priorities means that additional priority can be given to those with a stronger residence connection.

The requirement to accept a homeless duty to those with six months out of the previous twelve months or three years out of the previous five years or no connection anywhere remains unchanged. A recent review of a sample of 100 accepted homeless cases identified that approximately one third of households had a minimum of ten years' residency in the borough at the time they approached and a further third had five years.

It is proposed that priority households with ten years continual residence in Westminster at the time of being accepted for housing are given more points than those with less residence. The extra points will result in them being housed more quickly than an applicant with less than ten years residence.

This will be applied to new applicants (main applicant and/or partner) registering from April 2011 with the onus on the applicant to prove their continuous residence. The priority for local residence will be assessed at the point of application. Time in temporary accommodation will not count.

Tenants will receive residence points included as part of their priority as it is assumed they already have a significant connection to Westminster.

In addition it is proposed to change the criteria that put applicants in a low priority group. At present anyone (other than a homeless applicant because of the legislation) who applies for housing is put on a low priority list and is ineligible for housing if they have less than two years residence in Westminster. It is proposed to raise this to three years.

## **5. Medical priority**

The current scheme awards medical/welfare priority to applicants depending on the severity of their medical circumstances and housing need. Non-homeless applicants can be admitted to the medical priority group or be given Category B medical points if appropriate. Category B medical points are awarded to those where there is a medical need to move but is not severe enough to receive the highest medical priority. Homeless applicants are also given extra priority if they have medical needs.

The medical priority group will continue, as we have a legal duty to give reasonable preference to those with medical and welfare needs. However it is proposed that Category B medical points should no longer be used as recent case law has indicated that it is not necessary to take into account composite need.

It is also recommended that priority points on medical grounds will only be awarded once per application and not to each member of the household with a medical condition. Some applicants in the medical priority group have been registered for many years. During the course of 2011/12 all applications will be reviewed to see what the blockages are that have prevented them bidding successfully and find solutions.

It is also proposed that accepted homeless applicants requiring general needs properties will no longer be given additional medical points. Households will continue to be assessed to see whether they fall into a mobility category (1, 2 or 3).

## **6. Reciprocals**

Reciprocal arrangements are agreed where the council re-houses a tenant of a Registered Provider (RP) in exchange for nominating a priority applicant from the housing register to the vacated RP property or similar size property.

Households currently agreed for a reciprocal move can remain on the list indefinitely with unlimited bidding. It is proposed that households are given a time limit of three months for bidding for a home. If unsuccessful after this time one direct offer of a suitable property will be made and if the direct offer is refused the application will be closed. This change will also be applied to applications currently registered (at present there are six households).

## **7. Homeless Households – time limiting**

Housing Options undertook a very successful project in 2010/11 to review all the single homeless applicants in temporary accommodation. Many could have been

rehoused long ago but for various reasons had not used the bidding system. The project has demonstrated a need to increase the circumstances in which direct offers are made and make clear to applicants that the Council's duty will come to an end if a suitable offer is refused. Single homeless people now have a time limit for bidding and if unsuccessful during that period, are made a direct offer.

It is therefore proposed that the ability to time limit bidding followed by a direct offer is also extended to homeless families as this will encourage households to make sensible decisions about the properties they are refusing in order to move out of temporary accommodation sooner and into social housing.

In addition some households currently have unlimited bidding which allows them to refuse what is often considered a suitable property. Where an applicant has sufficient priority to obtain a social housing via Choice Based Lettings that applicant may be given a direct offer. It is therefore proposed that the homeless duty be discharged on homeless households that refuse a suitable property without sufficient reasons. This includes homeless households that have regularly bid for properties (and viewed) but refuse a property without good reason.

It is also recommended that the homeless duty be discharged if an applicant in temporary accommodation on which the lease is coming to an end is made a direct offer of a suitable social housing. Currently these households are placed into alternative temporary accommodation if they refuse a suitable offer.

It is proposed that where applicants living in temporary accommodation have possession proceedings brought against them due to anti-social behaviour that their priority is reduced pending the outcome of the possession action. If the action is successful the rehousing duty will be discharged. If unsuccessful, bidding will be reinstated.

## **8. Family Quota**

Currently adult sons and daughters of council tenants and lessees can apply for priority housing under the Family Quota scheme. Each financial year the council has allocated a number of properties to Family Quota applicants (80 in '10/11) with priority being given to the most overcrowded applicants.

However it is proposed to stop the Family Quota scheme as there are other options for these adults such as sub-market rent schemes, low cost home ownership opportunities and – for younger working age single applicants – renting in the private sector with friends/share house arrangements. With flexible tenancies likely to be introduced it is inconsistent to create an expectation among tenants that their children have an entitlement to social housing.

There are currently 380 Family Quota applicants registered on the list of which 309 are single applicants requiring a studio size property and of these, 157 are aged 25 or older.

All Family Quota applicants will be contacted and sent details of Catalyst Housing Group operating as Homeownership Westminster which acts as the single gateway to advice and information on the variety of products available in the intermediate housing market. It is also proposed that current Family Quota applicants are registered in group 1 for top priority assistance with opportunities on Catalyst's register.

They will also be given information about accessing home ownership opportunities within the wider London area through the Mayor of London's First Step service.

In addition it is hoped that we can work with Shepherd's Bush housing association scheme (InComE Project). See 4.3.11 above.

## **9. Overcrowding**

There are approximately 1,000 council tenants currently registered for a move to a larger property. Their priority level depends on how many bedrooms they are lacking. At present this is assessed against one bedroom standard while the number of rooms allocated to a family being rehoused is counted on a slightly different bedroom standard. It is proposed in future to use the bedroom standard below as the single standard.

A single person is entitled to one room (a bed-sit or studio); plus usual facilities (some or all of which may be shared). Couples are entitled to one bedroom and a living room; plus all facilities (some or all of which may be shared).

For larger households additional bedrooms will be allocated to the following:

- A single adult over 18 years old
- An adult who is not the partner or same-sex sibling of the applicant (although this will be dependent on the availability of accommodation, and such households may be offered two bed-sits)
- An adult who is acknowledged to be a carer and not the partner or same-sex sibling of the applicant
- An applicant and partner (unless agreed medical evidence specifies they require separate bedrooms)

- One child

**Or**

Two siblings of the same sex where there is less than a ten-year age gap. (Two adult siblings of the same sex will usually be offered a one bedroom flat with separate sitting room so that they have the option of using the bedroom and sitting room as two 'bed-sitters').

**Or**

Two children of the opposite sex under 10.

The new bedroom standard does not give additional points for sharing facilities (bathroom, toilet, kitchen and living room), adult children (over 18) sharing a bedroom or give sex separation points which are currently given where two members of the household of the opposite sex, both over ten years old have to share a room for sleeping.

50 points will be given in future to those lacking one bedroom, 150 to those lacking two and 250 to those either lacking three bedrooms or assessed as having a band A hazard rating for overcrowding under the HHSRS.

Tenants will receive 50 additional points if they are working (see section 3 above).

One of the main drivers for rehousing overcrowded tenants is the negative impact on children. They may have nowhere to play or do homework, suffer from low self esteem and could be at risk of falling into anti social behaviour. For this reason it is proposed that overcrowded families whose household composition includes children will be give priority over all-adult households whose applications will be reduced by ten points.

Although it is proposed to stop the Family Quota, we will continue to take a case management approach to households who are overcrowded by two or more rooms. This will include working with adult members of such households to identify alternative housing options, such as the private sector and intermediate housing as described in section 8 above.

## **10. Overcrowding Registered Provider Quota**

In the past overcrowded tenants of Registered Providers were able to register with WCC and were given priority if they had a band A hazard under the HHSRS. Following discussion with our RP partners through the HACE (Housing Association Chief Executive) group it is now proposed instead to have a small

quota to rehouse tenants put forward by the RPs themselves. They will each be asked to nominate a maximum of four households who are overcrowded and who the RP is for some reason unable to assist.

## **11. Like-to-Like Moves**

Tenants wishing to move to a property of the same size are currently able to register for a like-to-like move, but have little or no priority for a move. The government are proposing to enhance mutual exchange opportunities nationwide and there is already a successful web based Homeswapper scheme. There is a fee to register with Homeswapper and the Council currently pays this on behalf of the tenant to encourage take-up of the scheme.

It is proposed to discontinue like to like moves and instead signpost tenants to mutual exchange schemes through which they find another council or housing association tenant and 'swap' homes.

Households that require a move to the same size property on urgent or medical grounds will as now be assessed under a different priority group eg Medical Priority or via a Management Transfer.

There are also approximately 200 single tenants in studio flats who are registered to move to one bedroom homes. Although under the bedroom standard their need is only for a studio, the oversupply of one bedroom homes in the council's stock means that these moves should be encouraged. Ideally almost all single applicants should be rehoused into studios (unless they have some medical need for more space) and once they have successfully completed one year as an introductory tenant they should be eligible to move to a one bed, freeing up the studios for rehusings through the Pathway (see section 18 below).

It is proposed to continue these moves, clarify the requirement to complete the probationary year, and to publicise the scheme through CityWest Homes to encourage take-up.

## **12. Westminster Community Homes (WCH)**

Westminster Community Homes Ltd is a Housing Charity set up by Westminster City Council to acquire existing homes and build new homes for use by Westminster residents. It has recently become a Registered Provider.

The properties are managed by CityWest Homes and WCH has entered into a nominations agreement with the City Council to provide 100% nominations to all first lettings and all re-lets. Assured tenants of WCH properties are able to register for a transfer on the City Council's transfer list.

The following tenancy schemes are operated by WCH with Family Homes and Settled Homes properties being advertised through Choice Based Lettings:

**i) Family Homes (Social Rented Homes)**

Family Homes (including 2, 3 and 4-bedroom properties) are let on assured tenancies by Westminster Community Homes to priority applicants in housing need including overcrowded households. For all practical purposes the rent, security of tenure, the rights and responsibilities under the tenancy and day to day management arrangements will be same as a normal assured council tenancy.

However the collection of payment for water charges differs to other council tenancies in that it is payable by the tenant to the water company rather than collected in the total rent charge.

In addition to Family Homes above WCH also manages properties let on assured tenancies under the Community Build Scheme. These are available to applicants via Choice Based Lettings and households within the local community are prioritised through a local lettings scheme (see section 13).

**ii) Settled Homes**

Settled Homes are available to homeless households and are properties owned by Westminster Community Homes. These properties are let initially on an assured shorthold tenancy for four years. After this period the tenant will be offered an assured tenancy.

Tenants signed up to Settled Homes tenants are ineligible to apply for a transfer whilst they have an assured shorthold tenancy.

However there may be occasions where the household requires an urgent transfer, for example on medical grounds, during the assured shorthold tenancy. It is proposed that for this purpose discretion will be granted to allow applicants to move under the same criteria as Family Homes.

**iii) Intermediate Rent Scheme**

Westminster Community Homes offers 12 month assured shorthold tenancies to working households (not entitled to housing benefit at the time of application) through the Intermediate Rent Scheme. Tenancies offered under this scheme can be renewed up to a maximum of five years. These properties are not intended to be permanent homes and



households are expected to move on to alternative housing such as market rent or low cost home ownership after five years.

Households applying for properties under this scheme must apply through the First Step service.

### **13. Local Lettings Schemes**

From time to time the council will engage in local lettings schemes. The objectives of the schemes are to encourage residents to develop lasting connections with the area and contribute to a sustainable community and to reduce overcrowding as well as tackle other housing needs in the local area.

The Council is currently undertaking significant regeneration of its housing estates via its estate renewal areas and community build schemes and where possible local people will be prioritised when it comes to allocating new units with first priority being given to those who have been displaced by the works. They will have first choice of any of the new properties that meet their needs.

The next priority will be given to other residents on the estate according to their needs – in particular overcrowded households and those in need of wheelchair adapted property (some wheelchair properties may be excluded from a scheme depending on demand).

If it is not possible to let all the available properties via local lettings, the remaining properties will be re-advertised and the residential criteria will not be applied.

An example of a local lettings scheme in operation is at Little Venice and Bourne Terrace Undercrofts. Schemes currently planned for 2011-12 and beyond include John Aird Court, Avenue Gardens and Gloucester Terrace.

Westminster has recently operated local lettings initiatives at Lillington and Longmore Estate and at Peel House Regency Street:

At Charlwood House, initial priority for the 23 new homes was given to local tenants of the Lillington and Longmore Estate who were in priority housing need.

At Peel House, in Regency Street, 11 of the new 2-bedroom homes were set aside for local Peabody tenants who were under occupying. The resultant Peabody family sized voids were offered to Westminster nominees who were overcrowded or in need of family sized accommodation.

There are four Community Build schemes which are either currently under construction or shortly due to start on site for which priority will be given to local

tenants who have a need to be re-housed. These developments are being provided by Westminster Community Homes (WCH).

Local tenants with priority because of overcrowding or those local tenants who need to move for mobility (disability) reasons will be offered these new homes first before offers are cascaded.

The Community Build schemes are as follows:

- Undercrofts at Bourne Terrace and Little Venice: Handover on these units is expected in March 2011 delivering 14 new homes (4 x 1-beds, 6 x 2-beds, 3 x 3-beds and 1 x 4-bed). A number of these new homes are designed to disability standard and priority for these units will be given to local residents with mobility needs. Other non mobility units will be offered to local tenants in priority housing need.
- Avenue Gardens: Two 4-bedroom homes are due to be delivered in Autumn 2011 - priority will be given to local tenants in priority housing need.
- Gloucester Terrace - The development of 8 social rented units is expected to commence at this site by end of March 2011. Access to these new homes initially will be provided to local existing tenants who have priority for a housing transfer. In the event that priority local tenants are re-housed in the new homes at Gloucester Terrace. Homes to be provided at Gloucester Terrace
  - 1 x 1-bed 2 person-social rent
  - 1 x 2-bed 3 person-social rent
  - 4 x 2-bed 4 person-social rent
  - 1 x 3-bed 5 person-social rent
  - 1 x 3-bed 6 person-social rent
- John Aird Court W2 is due to go on site in March 2011 and is expected to deliver nine homes. Five homes will be for social rent and two shared ownership homes. Two further homes are proposed for market sale, but these may be converted to shared ownership depending on the availability of additional grant funding to make this possible.

The social rented homes will be made available firstly to local tenants in priority housing need. Local tenants will also be given priority to buy the two shared ownership units, and the resultant void council homes will

be offered to local tenants in priority housing need. Should market homes be provided, existing local lessees will be able to purchase these homes, potentially on an equity share basis. Their old homes will then be provided as social housing by WCH.

Homes to be provided at John Aird Court:

1 x 3-bed 5 person—social rent (fully wheelchair compliant)

2 x 4-bed 6 person—social rent

1 x 2-bed 4 person—shared ownership

1 x 2-bed 4 person—shared ownership (fully wheelchair compliant)

2 x 2-bed 4 person—market sale/shared ownership

To ensure best use of stock it is proposed that in circumstances where a tenant is underoccupying a property that they will only be offered accommodation with one additional room than they need.

#### **14. Key Workers**

The current scheme includes a section on Key Workers. In 2003 Communities and Local Government set out which categories of Key Workers are eligible for Government-funded Key Worker initiatives (primarily Open Market Homebuy, New Build Homebuy and Intermediate Rent).

All Westminster Key Workers are required to register with the Homebuy Agent (Metropolitan Housing) if they are interested in these options. There is no requirement for households to be registered on the council's waiting list.

It is therefore recommended that the Key Worker section of the scheme is updated particularly as we are also proposing to no longer hold a housing register for non priority applicants from April 2011.

#### **15. Pathways Model for Single Applicants from certain groups (studios and 1-beds)**

The success of the single homeless move on project in 2010/11 demonstrated the value of using a Pathways Model for achieving settled and sustainable tenancies for vulnerable groups.

Experience of managing homeless applications from single applicants has shown that the vast majority of these vulnerable applicants require a period living in accommodation with support before moving on to general needs accommodation. However it is important that Westminster's supported sector does not become 'silted up' due to a lack of suitable move on for those who no longer require support, so places are not always available.

It is proposed to introduce a pathway model for vulnerable singles/couples accessing studio and one bedroom accommodation. New applicants will receive a housing needs assessment which will identify their support needs and signpost them to the most suitable supported accommodation, enabling them to develop the independent living skills they will need to manage an independent tenancy.

It is proposed to increase the quota of lettings to applicants already living in the supported sector who no longer require support, in order to create the spaces needed for new applicants referred in via the pathway.

## **16. National Witness Mobility Scheme**

The National Witness Mobility Scheme was established in 2003. The scheme supports people who are witnesses to serious crimes to move away from the area where the perpetrator lives, to minimise the risk of intimidation or repercussions when they give evidence in court. The council is supportive of this scheme and will consider any requests for assistance via the scheme on a case by case basis. WCC usually agrees to accept single applicants rather than those needing family sized accommodation.

## **17. Multi Agency Public Protection Arrangements (MAPPA)**

Occasionally the council is asked to house individuals who are subject to Multi Agency Public Protection Arrangements (MAPPA). This is after careful consideration by the Multi Agency Public Protection Panel chaired by the police and attended by housing, and is for risk management purposes. Such requests are considered on a case by case basis and the full range of housing options will be considered.

## **18. Foster Care Re-housing**

Existing council tenants who would need larger accommodation to be able to accommodate a foster child are assessed by social services and referred for re-housing. The current scheme includes Foster Care re-housings as part of the Community Care quota, however for future re-housings it is recommended that allocations for this priority group come out of the Children Act quota as this would be more appropriate.

## **19. Community Supportive Housing**

The new scheme will also reflect the changes previously agreed (Supply & Allocations Report 16<sup>th</sup> March 2010) for Community Supportive Housing following the phasing out of the distinction between sheltered and supported accommodation and moving to a single category of older people's housing. The scheme will be updated to include the new minimum age of 60 years old (55 in exceptional circumstances) for applicants applying for this type of accommodation.

### **5.1.5 Consultation and Communication**

The council has an obligation to consult with Registered Providers and residents/service users on changes to the Allocations Scheme and various consultations have taken place including an Equalities Impact Assessment (EIA) to assess the risks the new policies may have on certain groups of applicants.

The proposals were discussed with targeted audiences which included residents (Allocations Working Panel), service users of the Housing Options Service (Service Improvement Group), Housing Association Chief Executives and Members (Policy and Scrutiny Committee) as well as circulated to Westminster's Partners Forum which consists of advice agencies, law centres, medical centres and ethnic minority advice groups. In addition a small diversity project group met to discuss the potential impacts of the proposed changes as part of an Equalities Impact Assessment and included officers from the Housing Options Service (disability liaison officer), Housing Strategy team and Westminster Equalities Partnership.

The main issues raised through the consultation were that some vulnerable applicants or disabled people may be unable to work or be disadvantaged in seeking work. However this issue is addressed by the proposed Pathways Model as single vulnerable applicants will not be subject to workers priority. In addition applicants requiring wheelchair properties will be given a direct offer instead of competing with other priority households through Choice Based Lettings. There is also a risk that certain groups can be disadvantaged as having less of a connection to Westminster such as newer communities and younger vulnerable people. There is no data held confirming this view however and for single vulnerable applicants a Pathways model is being introduced. While the policy may disadvantage some new applicants who have come to live in Westminster, this needs to be balanced against the overriding objective to prioritise people with a longstanding connection to the city.

The proposed amendments will result in changes in the position of almost every applicant on the housing lists as some move ahead of others. There will be a surge in the number of queries, complaints and requests for a review

If approved, letters will need to be sent to applicants advising them of the changes. It is proposed to send letters in stages in order for the Housing Options Service to be able to manage the anticipated high volume of enquiries and correspondence that is likely to arise. It is anticipated that during the first weeks of implementation that the Housing Options Service will receive a high volume of requests from applicants wishing to have their case reviewed.

Applicants currently registered under Family Quota, like to like transfer and Reciprocal list will be written to advising them of the changes to their list and where appropriate alternative housing options available to them.

Other priority applicants will be sent letters requesting that they provide information regarding their working status by 17<sup>th</sup> June to allow HOS staff enough time to update applications prior to the go live date of 4<sup>th</sup> July 2011. It is also proposed that in order to implement the scheme HOS will operate a basic service during that week.

It is proposed that all changes are made well in advance of moving to the new housing IT system which is due to be launched in September 2011.

The proposed priority groups and points are;

Points Table for Family Sized Accommodation						
				Additional Points		
		Priority List	Priority Points	Workers	Residence	All Adult Households
<b>Underoccupation</b>	Transfer List	Cash Incentive	500	N/A	50*	N/A
<b>Urgent</b>	Transfer List	Management Transfer, Decants/ Essential Repairs, Community Care Nominations, Children Act, Foster Care, Learning Disabilities	400	N/A	50*	N/A
	Waiting List	Succession/Assignment, Reciprocal, Community Care Nominations, Children Act, Foster Care, Learning Disabilities	350	N/A	N/A	N/A
<b>Medical Priority</b>	Transfer List	Medical	250	N/A	50*	N/A
	Waiting List	Medical	200	N/A	50	N/A
<b>Overcrowding</b>	Waiting List	Registered Provider Quota	200	N/A	N/A	N/A
		HHSRS band A Hazard or Part X Housing Act 1985	250	50	50	-10
	Transfer List	HHSRS band A Hazard or Part X Housing Act 1985	250	50	50*	-10
		Lacking 3 bedrooms	250	50	50*	-10
		Lacking 2 bedrooms	150	50	50*	-10
		Lacking 1 bedroom	50	50	50*	-10
<b>Homeless</b>		Accepted prior to 1 <sup>st</sup> April 2011**	50	50	50*	N/A
		Accepted after 1 <sup>st</sup> April 2011**	50	50	50	N/A

\*Homeless applicants (accepted before 1<sup>st</sup> April 2011) and WCC tenants will automatically be awarded residence points.

\*\*Stage 2 Lease End applicants will receive 300 points in addition to points for homeless, residence or employment as set out above.

Applicants will be prioritised according to their points and eligible date.

Points table for applicants registered for studio/1-bedroom accommodation or Community Supportive Housing (applicants will not receive additional residence or working points);

<b>Studio and 1-Bedroom Accommodation</b>			
<b>Priority Group</b>	<b>Priority List</b>	<b>Priority Points</b>	<b>High Priority Medical/Welfare Points</b>
<b>Smaller Quotas</b>	Cash Incentive	500	N/A
	Social Services Nominations (including Community Care Nominations, Foster Carers, Rehousing with Carer and Learning Disability)	400	N/A
	Decants	400	N/A
	Tenants (Studio to 1-bed)	350	N/A
	Succession/Assignment	350	N/A
	Medical (Transfers)	250	N/A
	Medical (Waiting List)	200	N/A
	Homeless	50	N/A
	Hostel Move On/Street Homeless/Drug Alcohol Action Team (DAAT)	10	N/A
	Mental Health Hostel Quota	10	N/A
<b>Community Supportive Housing</b>	Cash Incentive	500	50
	Decants	400	50
	Council Tenants	0	50
	Homeless	0	50
	Waiting List Applicants	0	50
	Incoming Nominations	0	50

Applicants will be prioritised according to their points and eligible date.

**The following groups will not be able to participate in CBL;** Cash Incentive (Money to Move), Cash Incentive Outgoing Nominations, Children Leaving Care, Homeless (split households), Housing Department Staff, Incoming Nominations (general needs), Key Ring, Outgoing Nominations, Overcrowded Relief List, Returning Decant, Registered Provider Decants (general needs)



## 5.2 Amendment to the Council's priority awards for intermediate housing

5.2.1 A change is proposed to the City Council's allocations policy for intermediate housing opportunities located in Westminster. The change is recommended to give the 380 family quota applicants on the waiting list for a council property a higher preference for intermediate homes when the family quota scheme ends in April 2011.

5.2.2 Under the current priority awards, family quota applicants are placed into band three which is "all other social housing waiting list categories". But we are recommending that, from April 2011, all applicants with a verified waiting list number for the previous Family Quota Scheme be given first preference of intermediate opportunities alongside social housing tenants. All other award criteria remain the same.

5.2.3 The proposed priority group awards from April 2011 are set out below:

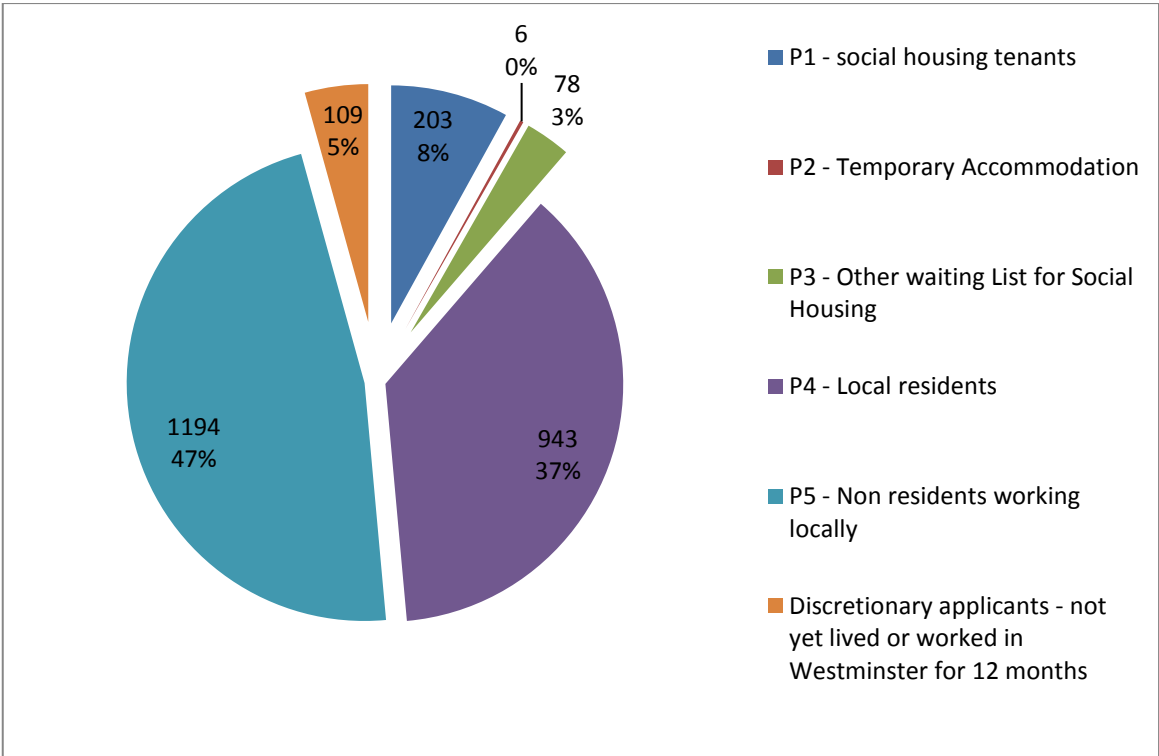
Referral Group	Proposed changes to priority groups from April 2011	
Social housing tenants giving up their property for nomination to WCC waiting list and ex Family Quota applicants (adult children of WCC tenants and leaseholders)	1	Social Housing tenants - all Council and RSL tenants living in Westminster. All ex-family quota category waiting list applicants with a WCC issued and confirmed list number as at 31 March 2011.
Waiting List for Council Housing	2	Homeless duty owed to re-house.
	3	All other Council Housing Waiting List categories.
Westminster residents	4	Currently living in Westminster.  (No nomination offer will be made until the term of residency is at least 12 months unless agreed by the Housing Development Manager.)
People working in Westminster	5	People employed in Westminster.  First preference within this group given to key workers meeting Westminster's definition, over other professions.  (No nomination offer will be made until the period of employment in Westminster is at least 12 months unless agreed by the Housing Development Manager.)

5.2.4 Properties offered to Westminster local authority nominations will be offered to households from the highest priority group. If they do not complete the purchase or let, then it is offered to the next highest priority household and so on until the property is taken. Where two nominations from the same priority group wish to accept the offer, prioritisation will be made according to:

- (i) lowest household income for one bed properties (followed by earliest date of registration should a tie still exist between applicants);
- (ii) the household with the greatest housing need for the number of bedrooms for a two bed or larger property (followed by lowest household income, then earliest date of registration should a tie still exist between applicants).

## 6. Review of Home Ownership - Intermediate Housing

6.1 Demand for intermediate housing remains consistent, with around 170 new applications to join the City Council’s intermediate housing register being received on a monthly basis by the Homeownership Westminster service. There are now 2,533 households registered for intermediate housing opportunities in the City, with the majority already resident in Westminster. The graph below shows the breakdown in priority award of registrants.



**Figure 1 Westminster Priority Awards**

6.2 During 2010/11 83% of opportunities for shared ownership sales and allocation to intermediate rent properties in the City were taken up by Westminster resident groups which receive first preference ahead of applicants whose local connection is an employment only one. All completions from the non-resident local worker group were Shared Ownership sales where no higher priority applicant could complete on the opportunity.

6.3 Sales of shared ownership schemes are continuing the trend of 2009/10 of taking longer to sell owing to a combination of a dip in first time buyer confidence and difficulties accessing competitive mortgage deals. Insufficient levels of deposits and high interest rates and restricted conditions on 90 – 95% Loan To Value arrangements are a significant barrier to those who would like to get on the property ladder via shared ownership.

6.4 There is a shift towards a greater proportion of intermediate housing opportunities being offered for rent as opposed to low cost home ownership in the foreseeable future until the property and mortgage markets recover. A focus on rental

opportunities over traditional products like shared ownership is also forecast under the Affordable Homes Programme 2011 - 2015 (as discussed at paragraphs 2.1 – 2.6). The table below sets out the new intermediate units completing during 2010/11 and the current projections (based on planning permissions) for new intermediate units from 2011/12 to 2012/13.

<b>New supply 2010/11</b>			Shared Ownership sales = 44 Intermediate Rent = 66
<b>Scheme name</b>	<b>Tenure type</b>	<b>Number of units</b>	
Peel House	Shared Ownership	14	
Merchant Square	Shared Ownership	16	
Murray House	Shared Ownership	5	
Murray House	Intermediate Rent	12	
Helix Court	Shared Ownership	5	
Du Fours Place	Shared Ownership	4	
Bentley House	Intermediate Rent	7	
WCH city wide acquisitions	Intermediate Rent	47	
<b>Total for 2010/11</b>		<b>110</b>	
<b>New supply 2011/12</b>			Shared Ownership sales = 12 Intermediate Rent = 25 Discounted sale = 32
<b>Scheme name</b>	<b>Tenure type</b>	<b>Number of units</b>	
Leinster Terrace	Shared Ownership	6	
Durweston Mews	Shared Ownership	2	
Duke Street	Shared Ownership	1	
Newman Passage	Shared Ownership	3	
Pocket Fermoy Road	Discounted sale	32	
WCH city wide acquisitions	Intermediate Rent	25	
<b>Total for 2011/12</b>		<b>69</b>	
<b>New supply 2012/13</b>			Shared Ownership sales = 37 Intermediate Rent = 31
<b>Scheme name</b>	<b>Tenure type</b>	<b>Number of units</b>	
Howick Place	Shared Ownership	3	
M'bone Magistrates Court	Shared Ownership	22	
John Aird Court	Shared Ownership	5	
Wolfson House	Shared Ownership	7	
Moreton Street	Intermediate Rent	31	
<b>Total for 2012/13</b>		<b>68</b>	

- 6.5 The HCA's 2011-15 Affordable Homes Programme Framework sets out that the HCA will no longer fund Rent to HomeBuy or Intermediate Rent as distinct products. However, one of the options that could be offered to Affordable Rent tenants at the end of their tenancies includes the option to purchase their home on shared ownership terms.

## **7. Financial Implications**

### **7.1 Homelessness**

7.1.1 The gross Housing General Fund homelessness budget for 2011/12 is £56.2m and includes £49.2m for the provision of temporary accommodation. The net budget for homelessness is £3.1m and for temporary accommodation is £4.6m

### **7.2 Homelessness and Housing Support Directorate (HSD) Grant**

7.2.1 For 2011/12 the City Council has been awarded a revenue grant of £8.3m for reduction in the use of bed and breakfast accommodation, homelessness prevention and rough sleeping services aimed at reducing the numbers of rough sleepers.

### **7.3 Supporting People**

7.3.1 As described above the former Supporting People grant allocation is now included as Formula Grant and the total planned expenditure is £14.4m

### **7.4 Capital Expenditure – Housing and Physical Disability**

7.4.1 The 2011/12 budget for gross capital expenditure on Disabled Facilities Grants to private sector tenants is £783k (supported by a government allocation of £470k). This budget is contained within the Housing General Fund capital programme.

7.4.2 In 2011/12, the HRA capital budget for Aids and Adaptations is £0.5m.

### **7.5 Capital Expenditure – Affordable Housing**

7.5.1 Within the Housing General Fund capital programme for 2011/12 there is £15m for the funding of new affordable housing supply via housing associations. This is combined with HCA Funding and Section 106 opportunities to maximise the supply of affordable homes.

## **8. Legal Implications**

8.1 Local Authorities have a legal duty under the Housing Act 1996 to assist people if they have nowhere to live and satisfy the criteria below :-

- Eligible for assistance in accordance with section 185 of the Housing Act 1996
- Homeless in accordance with section 175 of the Housing Act 1996.
- Priority Need (e.g. a family with children, pregnant, vulnerable due to old age, disabilities, mental health, care leavers, domestic violence)Section 189 of the Housing Act 1996
- Intentionality – whether or not someone has done or failed to do something which was a deliberate act the consequence of which led to the loss of their home in accordance with section 191 of the Housing Act 1996.
- Local Connection under Section 193 of the Housing Act 1996

8.2 The City Council is therefore required to allocate housing in accordance with its allocation scheme pursuant to the Housing Act 1996. The options set out in this report are consistent with the City Council's allocation scheme.

8.3 By virtue of Section 1 of the Homelessness Act 2002 many Housing Authorities are required to prepare and update a homeless strategy. However, being an excellent authority, the City Council is exempted from that requirement by virtue of Article 3 of the Local Authorities' Plans and Strategies (Disapplication) (England) Order 2005. This is a non statutory report prepared outside the homelessness regime

## **9. Staffing Implications**

9.1 There are none

## **10. Outstanding Issues**

10.1 There are none.

## **11. Performance Plan Implications**

11.1 Recommendations of this report support the following Business Plan aim:  
To promote the quality of life for Westminster citizens by working with all our partners to improve the housing experience of our residents and the safety and social care of vulnerable people and their families

## **12. Consultation**

12.1 The Housing Panel Allocations Working Group has provided valuable feedback on policy and service issues. Ongoing consultation on housing supply and allocations issues is also carried out with key stakeholders both within and outside the Council, through meetings with RSL's, the Housing Options Service Improvement Group and Partners Forum and the Supporting People Commissioning Body.

12.2 In January 2011 The Housing and Community Services Policy and Scrutiny Committee considered the priorities to be included in the 2011/12 Supply and Allocation of Social Housing report and in particular supported the proposed amendments to the Allocations Scheme and initiatives to reduce Temporary Accommodation and rough sleeping.

## **13. Crime and Disorder Act**

13.1 There are no Crime and Disorder Act issues arising from this report.

## **14 Health and Safety Issues**

14.1 There are none.

## **15. Co-operation with Health Authorities**

15.1 Westminster Primary Care Trust are a member of the Supporting People Commissioning Body and are fully engaged in the implementation of the Homelessness Strategy through the Health and Homelessness Steering Group.

## **16. Human Rights Act 1998**

16.1 There are no Human Rights Act issues arising directly from this report.

## **17. Risk Management Implications**

17.1 The projections contained in this report are based upon information received from partners about levels of future supply of accommodation, based upon previous years' levels of vacancies within social housing properties. Risks about the delivery of the different p[priorities and targets linked to this report are set out in the Housing Risk Analysis, reviewed by Housing Board quarterly.

## **16. Reason(s) for Decision(s)**

16.1 The proposals contained in this report set out the issues related to the development of allocation projections of the supply of social housing for 2011/12 to meet the Council's statutory obligations, meet the varying demands for social housing and to reduce the numbers of people living in Temporary Accommodation who are waiting for social housing

IF YOU HAVE ANY QUERIES ABOUT THIS REPORT OR WISH TO INSPECT ANY OF THE BACKGROUND PAPERS, PLEASE CONTACT GREGORY ROBERTS ON 020 7641 2834; EMAIL ADDRESS grobert2@westminster.gov.uk; FAX NUMBER 020 7641 1904
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## **Background Papers**

## Appendix A

### SUPPLY OF RENTED ACCOMMODATION PROJECTIONS 2011/12

	2011/12 Projection	2010/11 y.t.d.
<b>WCC Stock</b>		
Casual voids and returned from major works	456	418
Returned from conversion/rehab.	6	12
<b>HA Stock</b>		
2. First Let Nominations	51	186
3. Relet Nominations (inc. Homebuy)	270	259
<u>Total Net Voids</u>	<b>783</b>	<b>875</b>
<b>WCC Stock</b>		
4. Transfer (Existing WCC Tenants)	160	150
5. Less Decants for Major Works (-)	-16	-14
<u>Total Gross Voids</u>	<b>927</b>	<b>1011</b>

### Appendix B – Supply of Rented Accommodation 2011/12 – projections by property size

Supply	Bedsize						Total
	Studio	1	2	3	4	5+	
WCC Casual voids	145	198	73	29	10	1	<b>456</b>
Return from rehab		1	2	2	1		6
HA Stock all nominations	81	83	90	63	4	0	321
<b>Total Net Voids</b>	<b>226</b>	<b>282</b>	<b>165</b>	<b>94</b>	<b>15</b>	<b>1</b>	<b>783</b>
WCC Transfers	33	62	34	26	5	0	<b>160</b>
Less Decants for major works	-4	-6	-3	-2	-1		<b>-16</b>
<b>Total</b>	<b>255</b>	<b>338</b>	<b>196</b>	<b>118</b>	<b>19</b>	<b>1</b>	<b>927</b>



## Appendix B1 – Allocations projections of rented housing 2011/12 by property size

All allocations will be made via the City Council's Choice Based Letting Scheme except for those individuals who are identified for direct offers of accommodation. The following tables form a projection only but include all groups who access social housing; the actual allocation will be made after considering all the relevant issues relating to any applicant and his/ her household and will depend upon the bidding preferences of individuals under Choice.

### Family size accommodation

Category	Bed Size	2 Bed	3 Bed	4 Bed	5 Bed	TOTAL
<b>Tenant Transfers</b>						
Decants/Major Works		8	3	0	0	11
Cash incentives		17	1	0	0	18
Community Care Nominations		1	0	0	0	1
Children Act Rehousing		0	1	0	0	1
Medical, management transfer		21	18	5	0	44
Overcrowded		20	28	5	1	54
<b>TOTAL Tenant Transfers</b>		<b>67</b>	<b>51</b>	<b>10</b>	<b>1</b>	<b>129</b>
<b>Housing Register</b>						
Homeless		110	56	7	0	173
Category A		4	2	0	0	6
Community Care Nominations		1	0	0	0	1
Children Act Panel		2	1	1	0	4
Second Succession		3	0	0	0	3
Reciprocals		1	1	0	0	2
RSL and private severe overcrowded		8	7	1	0	16
<b>TOTAL Housing Register</b>		<b>129</b>	<b>67</b>	<b>9</b>	<b>0</b>	<b>205</b>
<b>TOTAL Family Lettings</b>		<b>196</b>	<b>118</b>	<b>19</b>	<b>1</b>	<b>334</b>

### Studio and One Bedroom Accommodation

	Studio and one beds*
Homeless including community supported housing	150
Other community supportive housing	130
Homeless split households	80
Cash Incentive	50
Pathways and small quotas; studio to one bed transfers	183
<b>Total</b>	<b>593</b>
<b>Total of all Lettings</b>	<b>927</b>

\*The high level of supply of studio and one bedroom properties means that broader quotas can be set.

## **GLOSSARY OF TERMS**

### **Affordable Housing**

Subsidised, low cost housing for rent or shared ownership.

### **Asylum Seeker**

Any person who has lodged an appeal for asylum but whose application has not yet been resolved (Home Office definition).

### **BBS**

Buildings Based Services for Rough Sleepers

### **Cash Incentive Scheme (CIS)**

Scheme offering financial and other assistance to encourage tenants occupying a property too large for their needs to move to smaller accommodation. Also applies to tenants moving out of WCC accommodation altogether.

### **Casual Void**

A vacant home which has become available at “no cost” to the Council, i.e. where the Council have not had to rehouse a tenant, either directly or indirectly, to create the void, eg. a tenant who moves into the private sector.

### **CLG –Communities and Local Government**

Formerly Department of Communities and Local Government, now abbreviated to Communities and Local Government. The Government department currently responsible for local government and housing.

### **Decant**

A permanent or temporary move of a tenant to allow major works/ refurbishment to be carried out, or prior to demolition and redevelopment.

### **English Partnerships (now part of HCA)**

Government agency responsible for promoting sustainable regeneration, housing, strategic brownfield development and best practice.

### **Family Quota**

Scheme for rehousing sons and daughters of existing tenants and leaseholders.

### **First Let Nominations**

Lettings from RSL housing not previously available to the City Council, e.g. newly built.

### **Floating Support**

A support service provided to people living in their own home, that is not a condition of residence, as opposed to a hostel or supported housing scheme.

### **GOL -Government Office for London**

Regional Government office covering the capital responsible for allocating resources and monitoring local authority housing strategies.

### **GLA -Greater London Authority**

Local authority responsible for certain strategic services (e.g. transportation, planning, etc) covering the whole of London. From 2008 the Mayor of London has responsibility at the strategic level for housing.

### **Homelessness Act 2002**

A new Act which reforms the legislation on homelessness and the allocation of social housing, and introduces a statutory requirement to carry out a homelessness audit or review and publish a homelessness strategy.

### **Homes and Communities Agency**

The Homes and Communities Agency is the new new housing and regeneration agency for England. It has been formed to join up the delivery of housing and regeneration, bringing together the functions of English Partnerships, the Housing Corporation, and a range of work carried out by the Communities and Local Government Department, including delivery in the areas of decent homes, housing market renewal, housing PFI, housing growth and urban regeneration.

### **Hostel Reciprocal**

An agreement whereby the Council nominates a vulnerable person to whom there is a statutory homelessness duty to a voluntary sector hostel for initial assessment and rehabilitation, and in turn the hostel has the right to nominate a person for social housing by the Council.

### **Housing Corporation**

Government agency responsible for funding and monitoring Registered Social Landlords principally housing associations. (Now Homes and Communities Agency)

### **Housing Panel Allocations Working Party**

A sub-group of the Housing Panel (body of representatives of tenants and residents associations in Westminster) to work with officers in developing allocation policies.

### **Housing Register**

A list of those requesting and eligible for council housing.

### **Key Worker**

People who are considered essential workers such as nurses, teachers, social workers and police officers.

### **LDA –London Development Agency**

Regional agency responsible for delivering the Mayor of London's Plan and economic objectives.

### **London Councils**

An organisation representing the London local authorities, formerly called Association of London Government

### **Move On Quota**

A rehousing quota available to a number of agencies working with rough sleepers.

### **Net Voids**

Total supply excluding tenant transfers, exchanges and reciprocals.

### **Primary Care Trust (PCT)**

The statutory organisation responsible for commissioning and providing primary health care services (GPs, community nursing etc). A PCT for the whole of Westminster came into effect in April 2002.

### **Priority Need**

Section 189(1) of the Housing Act 1996 defines the following groups as being in priority need:

- Pregnant Women
- Household with dependent children
- Those vulnerable because of mental-health, physical disability, old age or other special reason.
- A person who is homeless or threatened with homelessness as a result of an emergency such as flood, fire or other disaster.

This has since been amended by the homelessness Priority Need Order (see below).

### **Priority Need Order**

A statutory instrument, which came into effect on 31 July 2002, and which extends the categories of people who are classified as in priority need of housing assistance – to include 16/17 year olds, care leavers aged 18 – 21 and those leaving institutions.

### **Priority Rehousing Group**

The City Council has identified a number of groups of applicants who should receive priority consideration for rehousing because of their housing need (e.g. Category A Medical).

### **Reciprocal**

Exchange of nomination rights with another social landlord.

### **Registered Social Landlords (RSL's)**

Social landlords including housing associations and local housing companies registered with the Housing Corporation.

### **Relet Nominations**

Nominations to existing RSL stock.

### **Right to Buy (RTB)**

A statutory scheme that enables secure tenants to purchase their home at a discount, the level of which depends upon the length of public sector tenancy up to a maximum level.

### **Stage 2 Accommodation**

Self-contained, temporary housing.

### **Starter Homes Initiative**

A government initiative to fund shared ownership schemes for key workers.

### **Supporting People**

Funding framework for housing related support services for vulnerable people.

### **Vulnerable**

A priority need category under Section 189(1), Part VIII, Housing Act 1996 (see Priority Need).

**For completion by Cabinet Member**

**Declaration of Interest**

- I have no interest to declare in respect of this report

Signed ..... Date .....  
NAME:

- I have to declare an interest

State nature of interest .....

.....

Signed ..... Date .....  
NAME:

(N.B: If you have an interest you should seek advice as to whether it is appropriate to make a decision in relation to this matter.)

For the reasons set out above, I agree the recommendation(s) in the report entitled Supply and Allocation of Social Housing and Low Cost Home Ownership 2010/11 and reject any alternative options which are referred to but not recommended.

Signed .....

Cabinet Member for .....

Date .....

If you have any additional comment which you would want actioned in connection with your decision you should discuss this with the report author and then set out your comment below before the report and this pro-forma is returned to the Secretariat for processing.

Additional comment: .....

.....

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NOTE: If you do not wish to approve the recommendations, or wish to make an alternative decision, it is important that you consult the report author, the Director of Legal and Administrative Services, the Director of Finance and Resources and, if there are staffing implications, the Director of Human Resources (or their representatives) so that (1) you can be made aware of any further relevant considerations that you should

take into account before making the decision and (2) your reasons for the decision can be properly identified and recorded, as required by law.

**Note to Cabinet Member: Your decision will now be published and copied to the Members of the relevant Policy and Scrutiny Committee. If the decision falls within the criteria for call-in, it will not be implemented until five working days have elapsed for any call-in request to be received.**