

SUPPLEMENT TO THE AGENDA FOR

General Overview & Scrutiny Committee

Tuesday 19 January 2016**2.00 pm****The Council Chamber - The Shire Hall, St. Peter's Square,
Hereford, HR1 2HX**

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6. OVERVIEW OF STRATEGIC HOUSING DOCUMENTS	3 - 160
<p>To seek the views of the committee of engagement undertaken with the housing sector and of proposed new strategic housing documents for Herefordshire, including homelessness review and strategy, allocations policy and housing strategy, in order to inform the recommendations to cabinet.</p> <p>Supplementary papers:</p> <ul style="list-style-type: none">• Draft homelessness review 2016-2020• Draft housing allocation policy for Herefordshire 2016• Draft interim housing strategy 2016-2020	<p>3 - 68</p> <p>69 - 124</p> <p>125 - 160</p>

Homelessness Review 2016 - 2020

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1. EXECUTIVE SUMMARY

Herefordshire Council's Homelessness Review and the accompanying Homelessness Prevention Strategy have been developed in a challenging environment of significantly reduced council budgets, the uncertain impact of radical reforms to housing and social welfare policy and increasing pressures on local services. If we are to continue to build upon our existing success in preventing homelessness there must be a commitment to do so from across the council and from external stakeholders and partner agencies.

The strategic objectives set out in our Homelessness Prevention strategy, which accompanies this Homelessness Review, reflect the council's commitment to prevent homelessness happening whenever it is possible to do so and, where this has not been possible, to prevent it happening again.

1.1 Homelessness Act 2002

The Homelessness Act 2002 requires every local authority to carry out a review of homelessness in their district every 5 years and to publish a Homelessness Strategy based on the findings of the review. The legislation emphasises the importance of working strategically with social services and other statutory, voluntary and private sector partners in order to tackle homelessness more effectively.

The Homelessness Code of Guidance for Local Authorities, July 2006 states that the purpose of the review is to establish the extent of homelessness in the district, assess its likely demand in the future, and identify what is currently being done, by whom, and what level of resources are available for preventive and responsive work.

Herefordshire's Homelessness Review provides an evidence base for the development of our Homeless Prevention Strategy 2016-2020 through an assessment of:

- The national policy context.
- The local context.
- The housing market in Herefordshire.

The Review of homelessness includes:

- A review of homelessness trends, current levels of homelessness and likely future levels.
- A review of activities that contribute towards homeless prevention.
- A review of the activities that contribute towards securing accommodation.
- A review of the activities that contribute towards providing support.
- A review of the resources and activities that contribute to homelessness prevention.

1.2 Extent of Homelessness

- The number of households making a formal homeless application reduced from 372 in 2012-2013 to 220 households in 2014-2015, a reduction of 40%. The number of households being accepted as statutorily homeless also reduced from 70% of total applications in 2012-2013 to 53% in 2014-2015.
- The above should be understood in the context of a preventative approach, which reduces the number of households counted as making a formal homeless application. This should not, therefore, be taken to mean that homelessness is a decreasing issue in Herefordshire. Statistics show that 148 households were prevented from becoming homeless in 2013-2014 and 511 in 2014-2015.
- By far the most significant and consistent reason for the determination of 'priority need,' between 2012-2015, was that the household contained a dependent child or children. In total, 361 households were owed the full homeless duty for this reason.

1.3 Strategic Objectives

Our strategic objectives are built around preventing homelessness and finding solutions for those who often face the biggest barriers in accessing and sustaining a home and who, therefore, require more intensive support to do so.

Objective 1:

Minimise rough sleeping and increase tenancy sustainment opportunities for rough sleepers and people with complex needs.

Objective 2:

Maximise homelessness prevention activity by building on current success and promoting positive opportunities for homeless people.

Objective 3:

Improve the health and wellbeing of homeless people and those who are at risk of homelessness.

Objective 4:

Ensure that affordable housing and support services are available for homeless people and those at risk of homelessness.

We are working in a challenging environment of significantly reduced council budgets, the uncertain impact of radical reforms to housing and social welfare policy and increasing pressures on local services. If we are to continue to build upon our existing success in preventing homelessness there must be a commitment to do so from across the council and from external stakeholders and partner agencies.

2. INTRODUCTION

2.1 Overview of Local Housing Authorities Homelessness Duties

The homelessness legislation, Part 7 of the Housing Act 1996, places a general duty on housing authorities to ensure that advice and information about homelessness, and preventing homelessness, is available to everyone in their district free of charge.

The legislation also requires authorities to assist individuals and families who are homeless or threatened with homelessness and apply for help.

In 2002, the Government amended the homelessness legislation through the Homelessness Act 2002 and the Homelessness (Priority Need for Accommodation) (England) Order 2002 to:

- Ensure a more strategic approach to tackling and preventing homelessness, specifically by requiring the housing authority to develop a homelessness strategy for their area.
- Strengthen the assistance available to people who are homeless or threatened with homelessness by extending the priority need categories to homeless 16 and 17 year olds; care leavers aged 18, 19 and 20; people who are vulnerable as a result of time spent in care, the armed forces, prison or custody, and people who are vulnerable because they have fled their home because of violence.
- The legislation places duties on housing authorities, and gives them powers, to meet these aims. But it also emphasises the need for joint working between housing authorities, social services and other statutory, voluntary and private sector partners in tackling homelessness more effectively.

Homeless people are often perceived to be those who are sleeping rough. However, a household will be considered as statutorily homeless by their local authority if they meet specific criteria set out in legislation.

Homeless households are not necessarily or generally those who are 'roofless,' but they will be threatened with the loss of, or unable to continue to live in their current accommodation.

Simplistically, somebody is statutorily homeless if they do not have accommodation that they have a legal right to occupy, which is accessible and physically available to them and their household and which it would be reasonable for them to continue to live in. It would not be reasonable for someone to continue to live in their home, for example, if it was likely that this would lead to violence against them, or a member of their family.

In cases where an authority is satisfied that an applicant is eligible for assistance, is in priority need, and has become homeless through no fault of their own, the authority will owe a main homelessness duty to secure settled accommodation for that household i.e. they have been 'accepted' as homeless.

Priority need groups include households with dependent children or a pregnant woman and individuals who are vulnerable in some way. Vulnerability can arise as a consequence of:

- Mental illness or physical disability
- Being a young person 16 to 17 years old, or 18 to 20 years old and vulnerable as a result of previously being in care
- Previously being in custody
- Previously being in HM Forces
- Forced to leave home because of violence or the threat of violence

When a main duty is owed the authority must ensure that suitable accommodation is available until a settled home can be secured. In the meantime, households are either assisted to remain in their existing accommodation, or are provided with temporary accommodation.

Where the authority has found that the main duty is not owed, this will be for one of the following three reasons, the applicant has been found to be (i) 'not homeless,' or (ii) 'not in priority need' or (iii) 'intentionally homeless.'

Where a main duty is not owed the authority must make an assessment of the applicant's housing needs and provide advice and assistance to help the household find accommodation for themselves.

Where an applicant falls into a priority need group, but is intentionally homeless, the authority must ensure that accommodation is available for a reasonable time to allow the household to find a home.

3. THE COSTS OF HOMELESSNESS

3.1 Financial Costs:

'Evidence Review of the costs of homelessness, DCLG, August 2012

The Evidence Review was intended to provide an initial overview of evidence held by government and other organisations on the magnitude of financial costs to government from homelessness. Due to the considerable difficulties in estimating costs across the whole of the homeless population, the evidence related primarily to single homeless rough sleepers and hostel dwellers.

The report states that drug and alcohol dependency, especially when combined with a mental illness, are linked to homelessness as causal risk factors and triggers, but also as a consequence of being homeless. Triggers can also include bereavement, job loss, crime, leaving an institution (including the armed services), and relationship or family breakdown.

Information in the review would suggest that the most significant costs to health and support services are likely to come from drug and alcohol treatment and mental health services.

Estimated gross costs of homelessness are calculated to be between £24,000 and £30,000 per person, with a **total annual gross cost of up to £1billion.**

The above comprises benefit payments, health costs in supporting homeless persons with mental health, substance abuse or alcohol dependency problems, and costs to the criminal justice system from crimes committed by homeless people.

3.2 Costs to Health and Wellbeing

A review conducted by Homeless Link on behalf of Public Health England and published in June 2015, strengthens existing evidence on the impact of early intervention in reducing health inequalities.¹

A good quality stable home is critical to health and wellbeing. It helps people to be, and remain healthy, and provides a foundation from which to seek and find employment, feel part of a community and experience personal value and self worth.

For people experiencing homelessness or prolonged periods of rough sleeping, the rate at which health problems occur increases rapidly, particularly amongst single homeless people:

- 73% report a physical health problem, for 41% this is a long term problem compared to 28% of the general population.
- 45% have been diagnosed with a mental health issue compared to 25% of the general population.
- Factors which contribute to unhealthy lifestyles such as smoking and drug and alcohol use are also more prevalent than the general population.
- Research also highlights higher rates of communicable health diseases such as TB and higher rates of premature mortality.

As identified above, homelessness also places substantial costs on the NHS and other support services. Department of Health estimates show that people who are sleeping rough or living in a hostel, a squat or sleeping on friends' floors consume around four times more acute hospital services than the general population.

The Homeless Link Review identifies existing prevention activity, which has been developed in response to health and wellbeing needs and delivered by, or in partnership with, the wider health workforce.

The researchers claim, however, that there is still considerable potential for commissions across the NHS and public health to incorporate co-ordinated preventative approaches within the services they already commission, and to target those known to be more at risk of homelessness. This has the potential to maximise health and wellbeing gains, whilst reducing overall costs to services.

¹ Preventing Homelessness to improve Health and Wellbeing. Putting the evidence into Practice, Homeless Review, June 2015

3.3 Homelessness Link Health Needs Audit

Addressing health inequalities is a key priority for the NHS, Public Health teams and Clinical Commissioning Groups, but to do this good evidence base about homeless people's health and the services they use is needed.

Homeless Link's 'Health Needs Audit,' was developed in partnership with a series of pilot organisations across England, funded by the Department of Health. At a local level, the audit has been designed to enhance recognition of the health needs of homeless people in the commissioning process, filling in gaps left by local evidence gathering procedures such as Joint Strategic Needs Assessments.

The Health Needs Audit Toolkit, which is free to use, is designed to be used in partnership by representatives from the local authority, voluntary sector, and health services. It sets out the following steps:

- i. Planning between voluntary sector, health and local authority.
- ii. Audit conducted by local agencies over an agreed timescale.
- iii. Analysis and interpretation of the data.
- iv. Identifying action in partnership.
- v. Implementation and review.

In gathering the data as outlined above, the audit aims to:

- Increase the evidence available about the health needs of people who are homeless.
- Bring statutory and voluntary services together to develop responses to health need and gaps in services.
- Give homeless people a stronger voice in local commissioning processes.

3.4 Groundswell Homeless Health Peer Advocacy (HHPA)

Groundswell is a registered charity, which aims to enable homeless and vulnerable people to take more control of their lives, have a greater influence on services and to play a full role in the community. They specialise in peer-led work, involving people with experience of homelessness in finding solutions to homelessness.

Groundswell's Homeless Health Peer Advocacy offers one-to-one support for people experiencing homelessness to make and attend health appointments, overcoming the practical, personal and systemic barriers, which prevent them from addressing their health needs. The program is delivered by Peer Advocate volunteers, who all have personal experience of homelessness. In addition to providing practical support such as accompanying people to appointments, Peer Advocates build the skills and confidence of clients to access health services independently.

4. NATIONAL POLICY CONTEXT

The Ministerial Working Group on Homelessness was set up in 2010 by the (then) Housing Minister, Grant Shapps. The Working Group remit was to help communities to tackle homelessness by bringing together the relevant government departments to share information, resolve issues and avoid unintended policy consequences.

4.1 Vision to end rough sleeping: No Second Night Out nationwide

In July 2011 Grant Shapps announced £20 million Homelessness Transition Fund, which was to be administered by the umbrella group Homeless Link, to enable the countrywide roll-out of 'No Second Night Out (NSNO).'

The focus of NSNO was on single homeless people, including those sleeping rough, to whom local authorities do not have a statutory duty to secure housing. Sleeping rough is the most visible form of homelessness and where people are most vulnerable.

Rough sleepers and people in unstable accommodation have significantly higher levels of mental and physical ill health, substance abuse problems and higher rates of mortality than the general population. They can also experience difficulties registering with a general practitioner in the local area, accessing follow-up care or staying on a course of treatment.²

The NSNO plan sets out six priority areas where government departments and partners committed to work together to end rough sleeping, as follows:

- New rough sleepers should be identified and helped off the streets immediately so that they do not fall into a dangerous rough sleeping lifestyle.
- Members of the public should be able to play an active role by reporting and referring people sleeping rough.
- Rough sleepers should be helped to access a place of safety where their needs can be quickly assessed and they can receive advice on their options.
- They should be able to access emergency accommodation and other services, such as healthcare, if needed.
- If people have come from another area or country and find themselves sleeping rough, the aim should be to reconnect them back to their local community, unless there is a good reason why they cannot return. There, they will be able to access housing and recovery services, and have support from family and friends.

The final evaluation of NSNO services³ suggested that the project had been successful. The report stated that, in total, 67% of rough sleepers worked with were taken off the streets after their first night of sleeping rough, and of these 78% did not return to the streets once helped.

² 'Evidence Review of the costs of homelessness, DCLG, August 2012

³ 'No Second Night Out,' Homeless Link, February 2014

However, despite the input of these resources, the latest figures on rough sleeping for autumn 2014, published February 2015⁴ show a 14% increase on the autumn 2013 figure. The official counts of rough sleepers have recorded increases in consecutive years since 2010.

The 'Homelessness Monitor,' Crisis February 2015 notes that these official figures are likely to be a considerable underestimate of the reality. Their own exploratory estimates suggest that, on any typical night in England during 2010-2011, between 4,000 and 8,000 people would be sleeping rough, whereas the official estimates were of less than 2,000 people.

In Herefordshire a Rough Sleeper Outreach post was funded through the SASH Partnership, (Services Addressing Single Homelessness), formed between Herefordshire and Worcestershire councils, to support people who are sleeping rough or at risk of sleeping rough, access suitable accommodation, health and employment services. The post was funded from August 2013 on a fixed term contract running until December 2015.

Through partnership with St Peter's Night Shelter, Worcester, funding was also secured in September 2013, to employ a Hospital Discharge Worker on a fixed term contract, to work in Herefordshire.

The two posts are complimentary; the post holders work very closely together and have been very successful at homelessness prevention and sustained re-settlement.

4.2 'Making Every Contact Count: A Joint Approach to Preventing Homelessness,' DCLG , August 2012

The foreword to 'Making every contact count,' states that

'For many people, becoming homeless is not the beginning of their problems; it comes at the end of a long line of crises, a long line of interactions with public and voluntary sector services, a long line of missed opportunities. We must change that.'

'No single voluntary sector organisation, government agency, local authority or central government department can prevent homelessness alone but working together we can make a big impact.'

'Making every contact count,' encourages better cross-service working between councils and all partner agencies, including charities, health services, housing and the police to focus on earlier support for people likely to become homeless. The report contains five Government commitments and sets out what action is being taken to fulfil each of these:

- Tackling troubled childhoods and adolescence.
- Improving health.
- Reducing Involvement in crime.
- Improving access to financial advice, skills and employment services.
- Pioneering innovative social funding mechanisms for homelessness.

⁴ 'Rough Sleeping,' House of Commons Library, March 2015

The report also sets out a number of the 'local challenges' including the following:

1. To adopt a corporate commitment to prevent homelessness, which has buy in across all local authority services.
2. To actively work in partnership with voluntary sector and other local partners to address support, education, employment and training needs.
3. To offer a Housing Options prevention service to all clients, including written advice.
4. To adopt a 'No Second Night Out' model or an effective local alternative
5. To have housing pathways agreed or in development with each key partner and client group that include appropriate accommodation and support.
6. To develop a suitable private rented sector offer for all client groups, including advice and support to both client and landlord.
7. To have a homelessness strategy, which sets out a proactive approach to preventing homelessness and is reviewed annually to be responsive to emerging needs.
8. To not place any young person aged 16 or 17 in Bed and Breakfast accommodation.
9. To not place any families in Bed and Breakfast accommodation unless in an emergency and for no longer than 6 weeks.

4.3 Supreme Court Judgement on assessing 'priority need,' May 2015 Case Hatak v Southwark, Kanu v Southwark Johnson v Solihull:

The Supreme Court in three appeals (above) was asked to decide how Local Authorities should approach the statutory test of 'vulnerability' contained in the Housing Act 1996.

The court determined that to assess the 'vulnerability' of a single homeless person, local authorities must now decide if s/he is in greater danger than an 'ordinary' person facing the prospect of homelessness. Previously, councils have determined someone's vulnerability, and therefore eligibility for priority housing, by comparing their mental and physical health to other homeless people, who are statistically more likely to have drug addictions, learning difficulties and other disabilities.

Prior to this judgement, research by Crisis⁵ used mystery shoppers, with previous experience of homelessness, to examine the quality of advice and assistance provided by 16 local authorities to single homeless people.

The research found that in just over a third of visits, mystery shoppers did not receive an assessment and were not given the opportunity to make a homelessness application. The report makes recommendations, which include the following:

⁵ Turned Away: the treatment of single homeless people, October 2014

- All people who approach their local authority as homeless must be given the opportunity to make a homelessness application and should have the process clearly explained to them. All homeless households, whether or not they are deemed to have a priority need must be provided with meaningful advice and assistance.
- All applicants should be provided with a letter summarising the outcome of their visit, including the result of any homelessness application and how it can be appealed; what advice they have been given and next steps to be taken by them and the authority.

These recommendations already form part of Herefordshire council's standard practices, when advice and assistance about homeless or threatened is sought.

4.4 'Addressing complex needs: Improving services for vulnerable homeless people,' DCLG March 2015

The report summarises the work of the cross-government Ministerial Working Group on Homelessness since its inception in 2010 and sets out the issues around 'complex needs homelessness.'

People with complex needs have multiple support requirements, which overlap and compound each other, but as services tend to be structured around single 'issues,' they often struggle to access mainstream services.

The authors of research commissioned by the Lankelly Chase Foundation⁶ state that:

'We still categorise people in separate boxes defined by single issues. So a person who takes drugs to deal with childhood trauma, who falls into offending as a consequence, and loses their home when entering prison acquires three quite distinct labels. Each of these labels triggers a different response from statutory and voluntary systems, different attitudes from the public and media, different theoretical approaches from universities, different prescriptions from policy makers.'

The research sought to provide a statistical profile of people with multiple needs involved with the homelessness, substance misuse and criminal justice systems in England annually. The main findings of the study were:

- Each year, over a quarter of a million people in England have contact with at least two out of three of the homelessness, substance misuse and/or criminal justice systems, and at least 58,000 people have contact with all three.
- People affected are predominantly white men, aged 25–44, with long-term histories of economic and social marginalisation and, in most cases, childhood trauma of various kinds.
- In addition to general background poverty, the most important early roots of this type of multiple disadvantage arise from very difficult family relationships and very poor educational experience.

⁶ Hard Edges: Severe and Multiple Disadvantage in England, Bramley, Fitzpatrick et al, January 2015

- The 'average' local authority might expect to have about 1,470 active cases over the course of a year, as defined by involvement in two out of the three relevant services.

In addressing complex needs the government believes that, as the voluntary sector has expertise in working with people with complex needs, they are best placed to deliver the specialist services that are needed.

4.5 The 'Housing First' model of provision

'Addressing complex needs' refers to the 'Housing First' model of provision. This places homeless people with complex needs straight into long-term settled accommodation from which support needs are addressed, rather than using a 'stepped' approach of specialist temporary, followed by longer term move-on accommodation. Using this approach, results from pilot projects in other parts of Europe and North America have been very positive with around 90% tenancy sustainment being achieved.

A number of small-scale Housing First projects have been run in the UK and in February 2015 the results of an observational evaluation of nine of these was published.⁷

In general, people using these services were much more likely to have severe mental illness, very poor physical health and learning difficulties than the general population. They often experience social exclusion and marginalisation, lack social support networks and have histories of contact with the criminal justice system. Rates of problematic drug and alcohol use are also high.

The main findings of the research were:

- The average estimated length of homelessness per person was 14 years.
- Most of the Housing First services had been operational for less than three years and some for much shorter periods, which meant assessment of long-term effectiveness was not yet possible. However, 74% of service users had been successfully housed for one year or more.
- There was evidence of improvements in mental and physical health. 43% reported 'very bad or bad' physical health a year before using Housing First, this fell to 28%.
- 52% reported 'bad or very bad' mental health a year before using Housing First, falling to 18% when asked about current mental health.
- There was some evidence of progress away from drug and alcohol use, but also some evidence that this pattern was uneven.
- Indicative costs suggested potential savings in support costs of between £4,794 and £3,048 per person per annum.
- Overall potential savings in public expenditure could be in the region of £15,000 per person per annum.

⁷ Housing First in England, An Evaluation of Nine Services, Joanne Bretherton and Nicholas Pleace, University of York, February 2015

- There are strong arguments for exploring the potential of Housing First as a more cost effective approach to long-term and recurrent homelessness. However, it is not a 'low cost' option as it is a relatively intensive service offering open-ended support.
- There is the potential to use such schemes in new ways, for specific groups of homeless people, such as women and young people with high support needs or as a preventative model, targeted on vulnerable individuals who are assessed at heightened risk of long-term homelessness.

4.6 Localism Act 2011

The Localism Act 2011 introduced very significant changes to housing policy and planning in what the government described in, 'Laying the Foundations, A Housing Strategy for England, November 2011 as a 'radical programme of reform of social housing.'

Key reforms relating to housing and planning include:

- Social housing reform: This gives individual social housing providers new powers to grant tenancies for a specified fixed-term, where they choose to do so, rather than a 'life-time' tenancy.
- Allocation reform: This gives local authorities greater control over who is entitled to register for social housing.
- Reform of homelessness legislation: This gives local authorities powers to discharge their housing obligations to homeless people through the private rented sector on a minimum one-year Assured Shorthold Tenancy.
- National Planning Policy Framework (NPPF) 2012: This establishes a presumption in favour of sustainable development, the introduction of Neighbourhood Plans and the abolition of Regional Spatial Strategies.

4.7 Welfare Reform Act 2012

The Welfare Reform Act 2012, contained important changes to benefit entitlement, each of which is intended to reduce the overall cost to the Treasury. These include:

- The introduction of Universal Credit, which merges a number of different benefit entitlements, including Housing Benefit and Job Seekers Allowance, into a single monthly payment. There is a benefit cap that limits the amount of benefit a household is entitled to receive.
- Universal Credit is being rolled out in Herefordshire from March 2015 for single people, who would have been eligible for Job Seekers Allowance. It remains to be seen if this will impact negatively on access to the private rented sector through, for example, any reluctance by landlords/lettings agencies to offer tenancies to claimants on Universal Credit.

- From April 2013 new rules were introduced to restrict the amount of Housing Benefit working-age council or housing association tenants could claim if they were deemed to be under-occupying their home. For one spare bedroom, Housing Benefit entitlement was reduced by 14% per week and for two or more bedrooms by 25%.
- In October 2012 a new harsher sanctions regime for Job Seekers Allowance was introduced by the Welfare Reform Act. This set out three levels of fixed periods of sanction for failure to undertake agreed work search activity, ranging from four weeks up to a maximum of three years for repeated failures. Some research⁸ has indicated that sanctions are having a disproportionate impact on vulnerable groups, including homeless people, single parents and disabled people.

4.8 Summer Budget July 2015: Key measures relating to Housing and Welfare

The Budget announced around £17 billion of spending cuts, including £12 billion by 2019-20 from welfare reforms. The main reductions are as follows:

- From April 2017, the overall benefit cap, currently set at £500 per week (£26k per year) for a working age household with children, will be reduced to £385 (£20k per year) or £442 (£23k per year) in London.
- Housing Benefit will be frozen for four years from April 2016, along with both Child and Working Tax Credits and a number of other working age benefits, including Jobseekers' Allowance, Employment and Support Allowance, Income Support and Child Benefit
- The Universal Credit work allowance will be abolished entirely for non-disabled, childless households. For all other households whose claim includes housing costs, it will be reduced to £44.30 per week (£192 per month).
- From April 2017 parents claiming Universal Credit, including lone parents, will be expected to prepare for work when their youngest child is two and to look for work when they are three.

4.8.1 Removal of Housing Benefit entitlement for 18-21 year olds

- From April 2017, 18-21 year olds submitting a new claim for Universal Credit will not be automatically entitled to receive the housing costs element (the equivalent of Housing Benefit). There will be exceptions for:
 - Those who are parents and whose children live with them.
 - Vulnerable groups.
 - Those who had previously been living independently and working continuously for 6 months.
- 18 -21 year olds receiving Universal Credit will also be subject to a new youth obligation. They will be expected to participate in a programme of support at the start of their claim and

⁸ The Homelessness Monitor, Crisis and JRF, February 2015

to apply for an apprenticeship or traineeship, gain work place skills or go on a work placement after six months.

Following these announcements, the Chief Executive of Crisis claimed that more young people were likely to become homeless as a result of the proposed cuts.

*'Under-25s already make up a third of homeless people and there is a real danger these changes could make things even worse. For many young people, living with their parents simply isn't an option.'*⁹

4.8.2 Social Housing Rents

- From April 2016, government will require all social landlords to reduce their rents by 1% every year for the next four years (rather than increasing them by Consumer Price Index (CPI) +1%, as previously identified). This will be taken forward via the Welfare Reform and Work Bill and will apply to both social and affordable rents.
- Tenants in social housing who earn more than £30,000 per year, or £40,000 per year in London, will be expected to pay market or near market rents. This was subsequently withdrawn and replaced by a voluntary system for housing association providers, whilst being retained for council tenants.

The National Housing Federation (NHF)¹⁰ has responded to the announcements in the Summer Budget as follows:

- Whilst a cut in rents over the next four years will be a real help to some tenants, the reduction in rental income will impact on housing associations ability to plan for and invest in new housing development. An initial estimate suggests that at least 27,000 new affordable homes will not be built as a result of this loss.
- Modelling indicates that the reduction in the benefit cap could affect 205,000 households including 68,000 households living in housing association properties. The lower cap will impact on affordability in all areas of the country and a lower benefit cap outside London takes no account of regional variations in rents. Initial analysis indicates that, for a couple with three children, the weekly shortfall for a three-bedroom property is likely to be in the region of £44.34 using average rent data.

Whilst there are plans for a national living wage for over 25s (set at £7.20 per hour from 2016 and rising to £9.00 per hour by 2020) estimates in the Institute for Fiscal Studies post-budget briefing paper¹¹ indicate that this will not provide full compensation for the majority of losses that are likely to be experienced overall.

⁹ Jon Sparks, Chief Executive, Crisis, July 2015

¹⁰ National Housing Federation Briefing Paper: Summer Budget 2015, July 2015

¹¹ Paul Johnson, Institute for Fiscal Studies, July 2015

If the above initial projections for reduced household incomes are accurate, it is possible that homelessness will increase, across all household types, as tenants in the social and private-rented sector, subject to cuts in benefit entitlement, are unable to afford their rents.

4.9 Autumn Statement and Comprehensive Spending Review

In November 2015, the Chancellor of the Exchequer presented his Autumn Statement for 2015 and the Comprehensive Spending Review covering the period up to the 2020 General Election.

Main announcements affecting housing include the following:

- Funding for new affordable homes will be doubled, but will be refocused so that most of the funding will be spent supporting new homes for low cost home ownership, rather than to rent.
- Housing benefit in the social housing sector will be capped at local housing allowance rates for new tenants. This includes extending the shared room rate, whereby single people under 35 are only eligible for enough support to cover the cost of a room in a shared house. The change will apply to tenancies starting from April 2016 and will take effect from 2018.
- The cuts to working tax credits announced as part of the summer budget will not now be implemented. However cuts to child tax credits will still go ahead as planned.
- There will be changes to the way the management of temporary accommodation is funded. The management fee currently paid by the Department for Work and Pensions to local authorities on a per household basis will end from 2017-2018 and instead an up front fund will be established.

Whilst additional spending on housing is to be welcomed, focussing government support only on home ownership will not help those in housing need who are not able to save a deposit or get a mortgage. This will include substantial number of families and single people and families in need in Herefordshire.

Information in the 'Understanding Herefordshire Report,' 2015 confirms that the county is still one of the worst areas within the West Midlands region for housing affordability, where house prices at the lower end of the housing market cost around 8.1 times the annual earnings of the lowest earners.

Capping housing benefit for new tenants in the social housing sector to local housing allowance rates could also have a major impact on young people. This change is likely to make it more difficult for single people under 35 to find a home in Herefordshire that they can afford.

4.10 Housing and Planning Bill 2015

Extending the Right to Buy to housing association tenants

The government's proposed Housing Bill will:

- Extend the Right to Buy to housing association tenants,¹² offering discounts worth up to £102,700 in London and £77,000 in the rest of England, but not in Scotland or Wales, where Right to Buy is being abolished.
- There are around 2.5 million housing association tenants. Whilst they already have the Right to Acquire, the discounts are much less generous, ranging from £9,000 to £16,000 depending on location. In addition, the Right to Acquire is currently not available in rural areas where there are fewer than 3,000 properties.
- To fund the policy the Housing Bill will require stock-owning councils to sell 5% of their most valuable housing properties when they become vacant and replace them with cheaper homes. Cash from the sale proceeds will be used to create a £1bn Brownfield Regeneration Fund.
- The government has made a commitment to ensure there would be 'one-for-one' replacement for all the properties sold under extended RTB. However, figures released by the Department for Communities and Local Government (DCLG), June 2015, show that 12,304 homes were sold under the Right to Buy in England in 2014-2015, whilst only 1,903 homes were started or acquired to replace them.
- The Housing Bill contains measures to deliver an extra 200,000 new homes through the new Starter Homes initiative, which will offer a 20% discount to first-time buyers under 40. It is intended that these will be built predominantly on brownfield sites that were not previously identified for housing development.

Locally, there could be a loss of housing association properties in Herefordshire, but at present, there are too many variables to allow any accuracy of predication.

4.11 Making Every Adult Matter (MEAM)

The MEAM report, 'Solutions from the front line,' June 2015 sets out how policymakers, local authorities, commissioners and frontline services can respond to the challenges faced by people experiencing multiple needs. The findings are based on qualitative research with 50 people who have either had experience of multiple needs or are practitioners supporting those who do.

Respondents emphasised the need for better joint working between different sectors, which would prevent people from being 'bounced backwards and forwards' between services without anyone taking full responsibility for their welfare.

¹² There may be some Right to Buy exemptions, for example properties that will be difficult to replace in rural areas. Tenants may be provided with a 'portable discount' as an alternative.

One of the ways suggested ways in which this could be achieved was through a central point of contact, responsible for linking all of the different services together on behalf of the person concerned.

One of the recommendations was that Commissioners should be accountable for ensuring local areas have joined-up services, and identifying where people with multiple needs fall through the gaps. The report states that:

'In every local area people with multiple needs and exclusions are living chaotic lives and facing premature death because as a society we fail to understand and coordinate the support they need. Yet evidence shows that by working together local services can develop coordinated interventions that can transform lives.'

5. HEREFORDSHIRE HOUSING MARKET

Housing is a fundamental requirement for good health and wellbeing. Inequalities in a range of health issues can be tracked to the quality of housing, examples include the effects on the general quality of living and mental/general health, people rough sleeping when their housing needs are not met and terminal illness or death due to inadequate living conditions.

The following information is taken primarily from Understanding Herefordshire 2015.¹³ The report provides strategic intelligence for commissioning and business planning for the whole county.

- Within the West Midlands region, Herefordshire is ranked as the third most expensive unitary or shire authority when median rents for all dwelling sizes are compared.
- The difficulties in acquiring housing are compounded by having one of the worst affordability levels within the West Midlands region; with houses at the lower end of the market costing around 8.1 times the annual earnings of the lowest earners. This puts greater pressure on the affordable housing options that are available across the county and with a high demand against limited supply, there is a substantial shortfall.
- The Local Housing Market Assessment 2013 identified that, to balance the housing market over the longer term (2011-31), an average of 35% of new homes built would be a viable level of affordable housing. The report recommended a range of tenures to cater for a range of housing needs and a range of circumstances, particularly for those that can afford to pay more than social rents, but still cannot access the market.
- Between April 2011 and March 2015, an additional 434 new affordable homes were built or acquired for those in housing need in the county.
- The last decade has seen a large increase in the number of concealed families, i.e. those that live in a household containing more than one family (including grown-up children

¹³ Understanding Herefordshire 2015: An Integrated Needs Assessment

who have a spouse, partner or child living in the household; elderly parents living with their family; or unrelated families sharing a home).

- In 2011 there were almost 850 concealed families, an increase of 87% on 2001 compared with 70% nationally.

This increase could be related to:

- A combination of the affordability of housing and the availability of finance since the credit crunch.
- There may also be some connection to increased migration following the expansion of the European Union. The 2011 Census shows that a relatively large proportion of people in the white non-British ethnic group live in some form of shared housing.
- The 'heads' of just over half of the concealed families were aged under 34, mostly either lone parents with dependent children or couples with no children.

5.1 Structural Factors impacting on homelessness

The 'Homelessness Monitor England'¹⁴ is an annual state-of-the-nation report looking at the impact of economic and policy developments on homelessness. The current report is the fourth of a five year project (2011-2016). Research for the report is being conducted by Heriot-Watt University and the University of York on behalf of Crisis.

The Monitor states that the continuing shortfall in new house building, relative to household formation, is a prime structural factor contributing to homelessness and other forms of acute housing need.

The research quotes household formation projections for England, which indicate that household numbers will increase at an average rate of 220,000 a year up to 2021. This means that the rate of new house building would need to almost double from the 2012-2013 levels of 125,000 just to keep pace with the rate of new household formation and without alleviating existing housing pressures.

The impact of structural factors is reasserted in the Housing of Commons Briefing Paper, August 2015,¹⁵ which states that where there is an insufficient support of affordable housing, prices are pushed up beyond the reach of the larger population. This puts additional pressure on the rented sector, which in turn inflates rents and results in more people applying for social housing.

Against this rising demand, the social housing sector has declined as a proportion of all housing in recent years. In 1981 it accounted for 5.5 million households (32% of all households) but by 2013-2014 this number had dropped to 3.9 million (17% of all households).¹⁶ This decline is a consequence of the low build rate and the impact of the Right to Buy scheme.

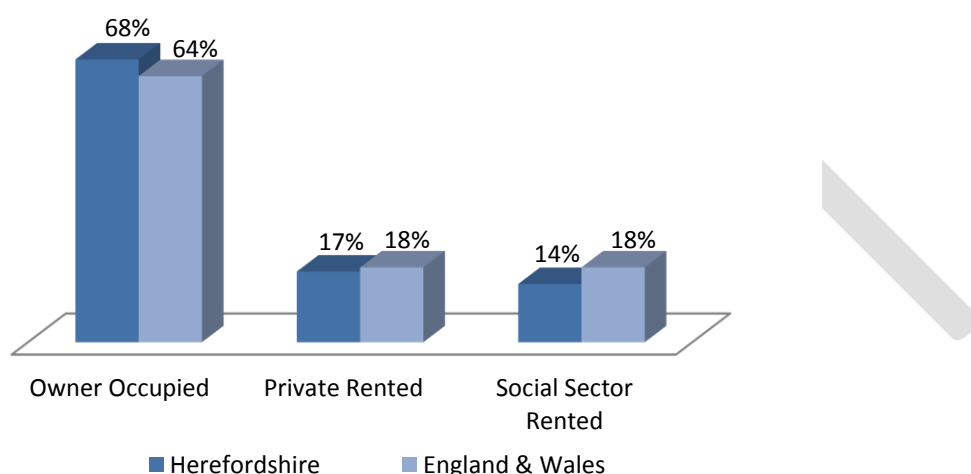
¹⁴ The Homelessness Monitor, Crisis, February 2015

¹⁵ House of Commons Briefing Paper Number 01164, Statutory Homelessness in England, August 2015

¹⁶ English Housing Condition Survey Household Report 2013-2014, published June 2015

The briefing paper suggests that, although the Right to Buy scheme has enabled the home ownership aspirations of many families and single people to be fulfilled, it has nevertheless removed vast numbers of social homes from public ownership and limited the scope for local authorities to house homeless families and others in housing need.

Locally, as can be seen from Chart 1 below, social rented housing is the smallest tenure in Herefordshire and at only 14% of total stock is substantially lower than the average for England and Wales.¹⁷



Whilst it is possible to identify the wider structural issues that underlie homelessness, relatively little is known about the personal, social and economic circumstances of homeless families and other vulnerable households that are represented in the statutory homeless statistics of local authorities.

It is recognised that people moving in and out of institutional care are vulnerable to homelessness. People leaving prisons, hospitals, psychiatric placements, as well as young people leaving care, are at particular risk of social exclusion and other factors which can lead to homelessness.

6. REVIEW OF HOMELESS TRENDS

Statistical data on homelessness in England is compiled by the Department of Communities and Local Government (DCLG) from statutory P1E Returns, which are submitted quarterly by local authorities. The P1E contains statistics on statutory homelessness, rough sleeping and homelessness prevention and relief.

¹⁷ Herefordshire Census data 2011

These official figures do not, however, give a full picture of homelessness in England. They exclude those who are homeless, but who do not approach a local authority for assistance and households who do not meet the statutory criteria.¹⁸

In the Homeless Monitor 2015¹⁹ it is suggested that headline statutory homeless acceptance figures are of declining usefulness in tracking national trends. This is because local authorities are increasingly refocusing homelessness management towards an approach aimed at encouraging applicants to choose informal 'housing options' assistance rather than making a statutory homeless application. Applications outside the statutory framework are not recorded as 'homelessness' in the P1E Statutory Returns. They will instead be counted as homelessness 'prevention' or 'relief.' To illustrate, in a survey of local authorities conducted by Crisis for the Homelessness Monitor, 63% agreed with the statement that:

'Because of a continuing shift towards a more prevention-focused service, post-2010 homelessness trends in our area cannot be accurately gauged by tracking our statutory homelessness assessment statistic.'

6.1 Official Figures: Extent of homelessness

Official DCLG homelessness statistics show that, nationally, in the three years up to 2012-2013 households 'accepted as homeless' rose by 34% from 40,000 households to 52,000. In 2013-2014, however, the numbers of homeless acceptances declined by 2%.

In Herefordshire, as shown in Chart 2 below, the number of households making a formal homeless application reduced from 372 households in 2012-2013 to 220 households in 2014-2015, a reduction of 40%.

The number of households being accepted as statutorily homeless also reduced from 70% of total applications in 2012-2013 to 53% in 2014-2015.

These figures should not, however, be taken to mean that homelessness is a reducing issue in Herefordshire but, as shown below, is a reflection of the successful homeless prevention work that has been undertaken.

¹⁸ That is households who are (i) homeless or threatened with homelessness within 28 days, (ii) eligible for assistance, (iii) have a priority need, (iv) not be homeless intentionally, (v) and have a local connection with the area (except in cases of domestic abuse)

¹⁹ Crisis, February 2015

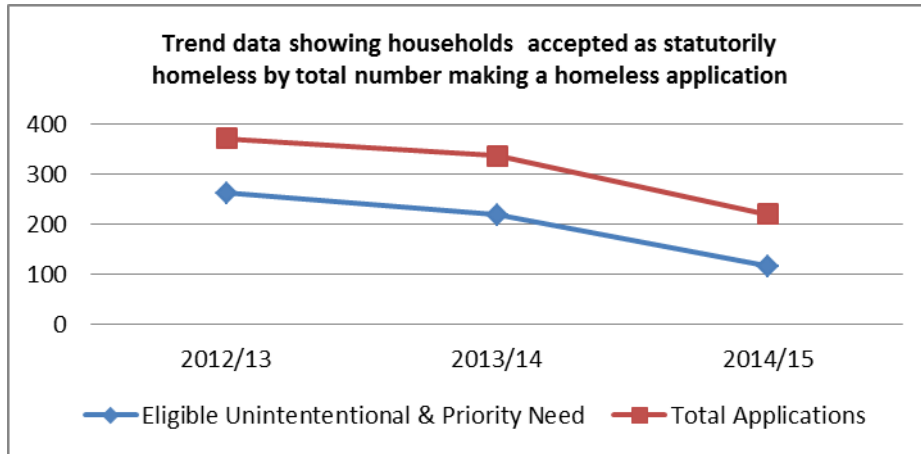
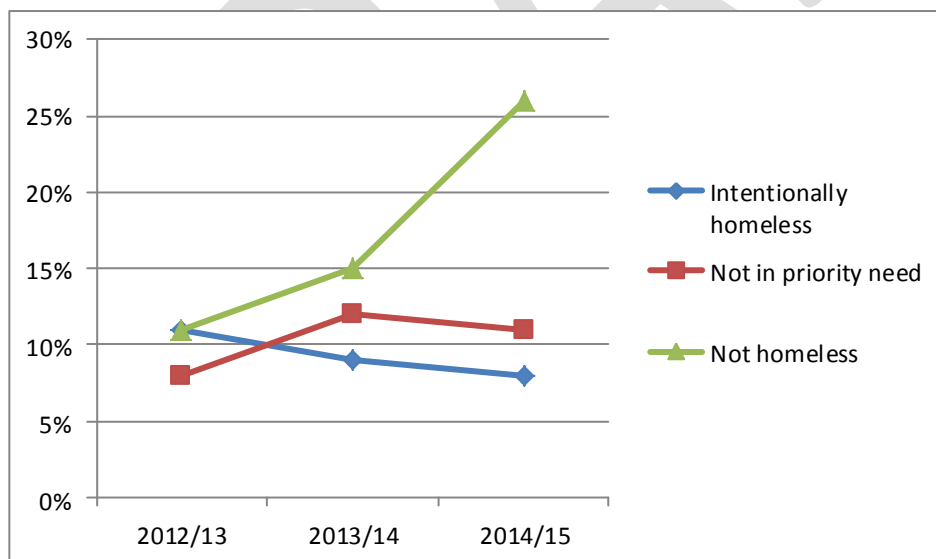


Chart 3 below shows that proportionately, over the three year period, the main reason for the full statutory duty not being owed was that the applicant was found to be ‘not homeless.’ At 26% of all applications for 2014-2015 this is close to the averaged national figure for that financial year at 25%.

Whilst the ‘not homeless’ figure has risen very significantly, there has been relatively little change in the proportion of decisions where the household was found to be ‘not in priority need’ or ‘not homeless.’



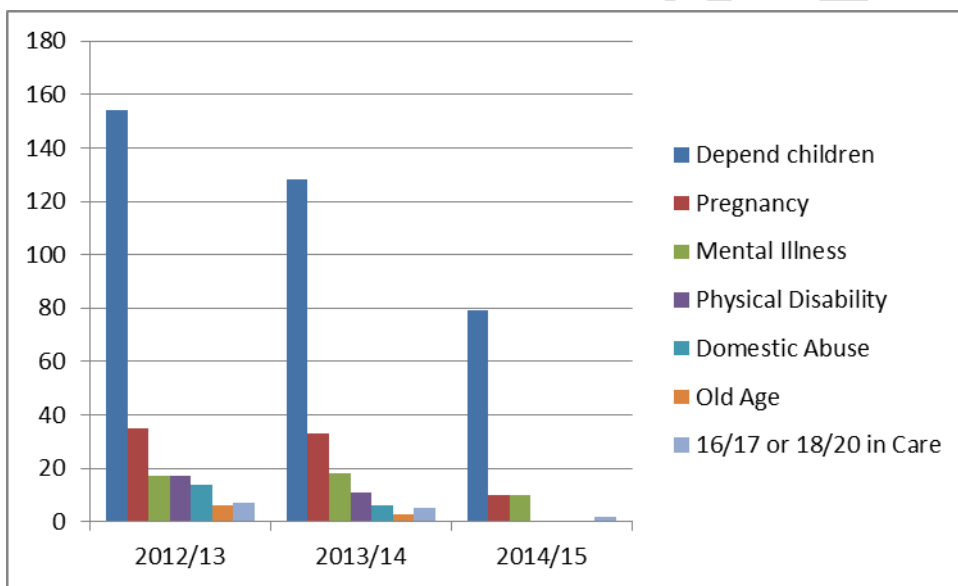
6.2 Priority Need

As illustrated in Chart 4 below, by far the most significant and consistent reason for the determination of ‘priority need,’ over the period, was that the household contained a dependent child or children.

Household member being pregnant was the next highest reason for priority need, although, in total, this represented 283 fewer households. The local situation mirrors the national picture where the presence of dependent children established priority need in 67% of total cases, followed by household member pregnant at 7%.

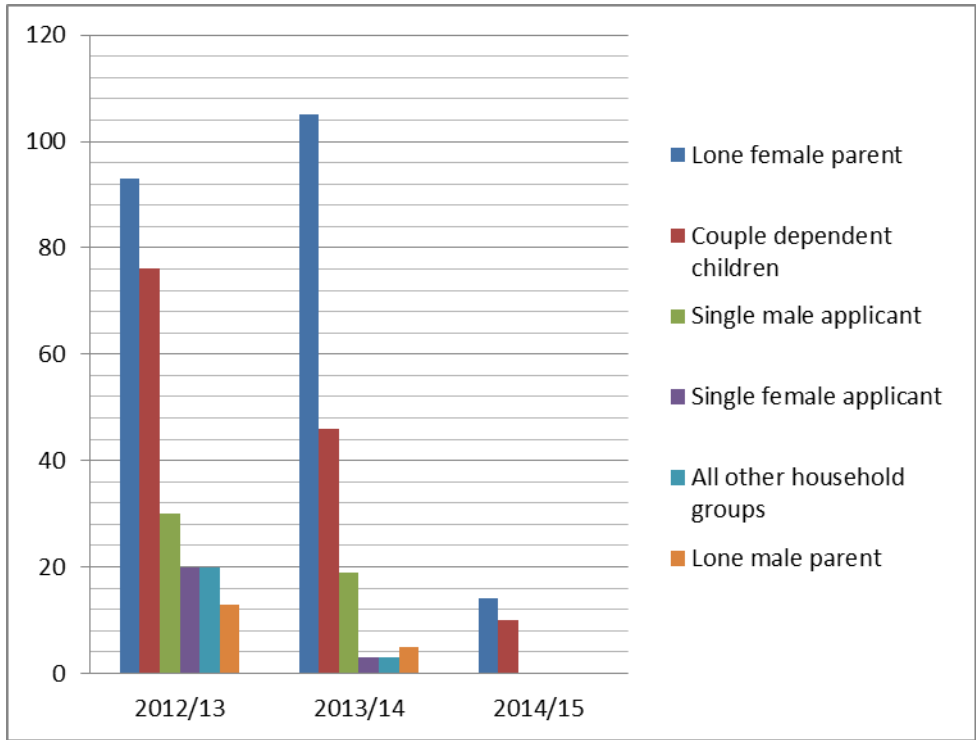
Over the three-year period 45 households were in priority need due to mental illness and 28 households consisted of or contained a disabled person. At respectively 6% and 5% of total applications this is consistent with national figures where priority need was established through mental illness in 8% of applications and physical disability in 7%.

It remains to be seen if the Supreme Court Judgements, *Hatak v Southwark*, *Kanu v Southwark* *Johnson v Solihull* relating to the application of the ‘vulnerability test’ for determining priority need will increase these acceptance figures.

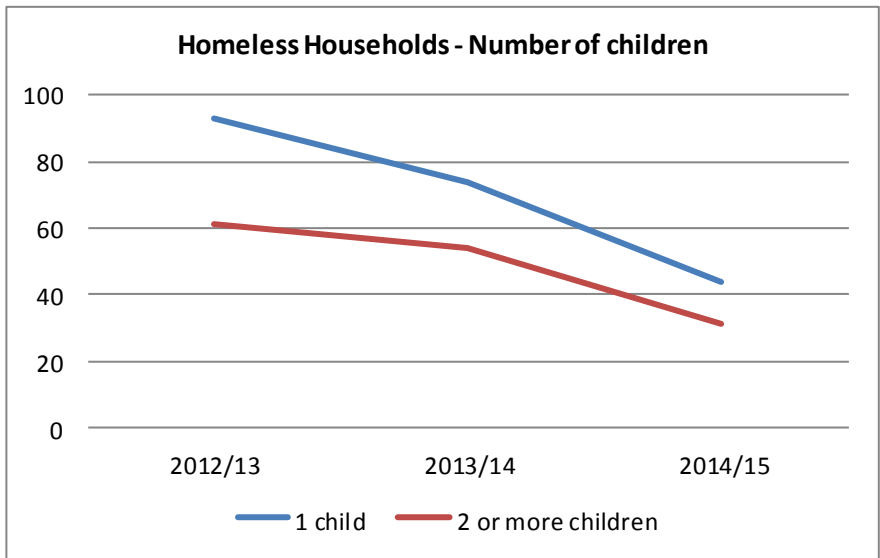


6.2.1 Priority Need – Dependent Children

Unsurprising given the priority need statistics above, the most frequently occurring household type in acceptance homeless figures are those which contain a dependent child/children, with lone female parents accounting for 36% and couples with dependent children accounting for 22% of homeless acceptances over the three year period. Chart 5 below provides more detail.



The majority of families whose priority need was established through the presence of a dependent child or children have one child. This has been consistent over the three year period, as shown in Chart 6 below.

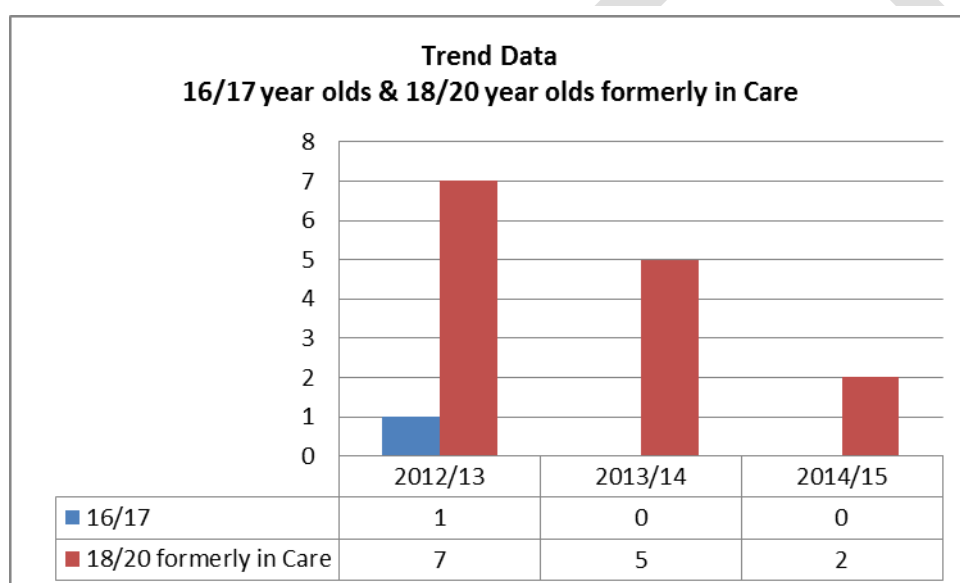


6.2.2 Priority Need – Young People

A priority need is established if an applicant is aged 16 or 17 or is aged 18 to 20 years and formerly in care.

The DCLG report, 'Making Every Contact Count',²⁰ quotes research which shows that the main 'trigger' for youth homelessness is the breakdown of family relationships, often compounded by difficulties at school, overcrowding at home, mental health problems, substance abuse and crime.

Chart 7 below shows that in Herefordshire, for the last two years, there have been no homeless acceptances for 16 – 17 year olds and reducing acceptances for 18 – 20 year olds, who were formerly in Care. This does not mean that potential homelessness is not an issue for these young people in the county, but is rather a reflection of a successful preventative approach.



6.2.2(i) Children Act 1989 and the Housing Act 1996

Very broadly, the Children Act 1989 places a duty on local authorities to 'safeguard and promote the welfare of children within their area who are in need' (section 17) and requires that they provide accommodation for any child in need within their area who has reached the age of 16 and whose welfare is likely to be seriously prejudiced if they do not do so.

Children who are accommodated and supported by local authorities under section 20 of the Children Act 1989 become 'looked after children,' which entitles them to additional support, from the age of 16 years, while in the care of the local authority and to when they leave care support.

²⁰ Making Every Contact Count: A joint approach to preventing homelessness, DCLG, August 2012

The Homelessness legislation, Part 7 of the Housing Act 1996, requires that in some specified circumstances the local authority will owe a main duty to secure settled accommodation for a homeless person, or someone threatened with homelessness within 28 days. Any need beyond housing is not addressed by this legislation.

The legal interrelations between the Housing Act and the Children Act are complex and have been subject to a number of court cases.²¹ As a consequence, in 2010 the government issued statutory guidance on 'Provision of accommodation for 16 and 17 year-olds who may be homeless and/or require accommodation.'

The guidance specifically states that the Children Act takes precedence over the Housing Act. If a young person aged 16 or 17 seeks help from the local authority because of homelessness, their needs should be assessed under section 17 of the Children Act 1989 and if the child is found in need of accommodation they should become a looked after child under section 20.

For homeless 16 and 17 year olds housing options, which provide security and safety, are usually very limited. With restricted access to welfare benefits, requirements for rent in advance and bond payments and tenancy law issues, very few reputable private sector landlords are willing to offer a tenancy.

This is why it is so important that local authorities have protocols in place that clearly identify respective responsibilities under the Children Act 1989 and the Housing Act 1996 and how statutory duties will be fulfilled.

However, Research published by the Law Centres Network²² concluded that some local authority protocols for dealing with homeless 16 and 17 year olds did not comply with the law, resulting in homeless young people failing to receive the support they are entitled to. It further claims that,

Local Authorities do not, as a matter of course, make their protocols publicly available. Nor do they routinely provide information that is accessible to homeless young people outlining the assessment process or the support they can expect from the Local Authority. This makes it very difficult for young people, without access to independent advice, to understand the nature of the support and accommodation they should be offered and the implications of any choices they make.

The above findings have been reinforced by the Children's Society's report, 'Getting the house in order,' March 2015, which claimed that:

- Only half of young people who present as homeless receive assessment under the Housing Act 1996 and/or the Children Act 1989. In a large minority of cases the Children Act is not given precedence over the Housing Act as it should and as has been established in case law.

²¹ R (G) v Southwark, 2009 and others

²² Supporting Homeless 16 and 17 year olds, February 2013

- As few as one in five of those who present as homeless get accommodated. Of these, only 20% are accommodated under section 20 of the Children Act 1989 as required by the statutory guidance.
- The remaining four young people in every five do not receive assistance. Many are encouraged to return home to their parents, but less than 5% receive support to help rebuild their relationship with their parents or carers.

The following table, which is taken is taken from ‘Keeping homeless older teenagers safe,’ Children’s Society, March 2015, sets out respective legislative responsibilities.

Looked after under Section 20, Children Act 1998	Accommodated under Housing Act and/or Section 17 Children Act
Pathway Plan developed by Children’s Services, prompting them to think ahead.	Minimum support and no requirement for a Pathway Plan to be put in place.
Accommodation paid for by Children’s Services up to the age of 18 years.	Young people are responsible for claiming benefits and paying for their accommodation and all other expenses.
Pathway Plans include education and career planning. All looked after children have named health professionals and have improved access to health services, including mental health services.	There is a duty on young people to participate in education or training but no specific support. Young people do not have any additional entitlements for health support.
All looked after children are entitled to advocacy support if they want to make a complaint or representation about the services they receive.	There is no automatic entitlement to advocacy support.
If a crisis occurs at the accommodation, e.g. as a result of behaviour deteriorating, Children’s Services continue to provide support and will provide a new placement.	If there is a crisis in their accommodation, which results in eviction, the young person may be seen to be intentionally homeless and therefore, receive limited support with continued accommodation provision.
Entitled to support from Children’s Services up to age of 21 years and 25 years in some cases.	

6.2.2(ii) Keeping homeless older teenagers safe,’ Children’s Society, March 2015,

The research set out in the above report is based on information obtained from three sources: freedom of information requests, analysis of 74 cases from Children’s Society practice; and the findings of focus groups and interviews held with practitioners and young people. It established that out of approximately 6,000 young people who presented as homeless:

- Almost one third had a serious mental health problem.
- Almost one third had experience of the criminal justice system.
- Over one third were at risk of child sexual exploitation.
- One quarter had problems with drugs and alcohol.
- Fifteen percent were not in education, employment or training

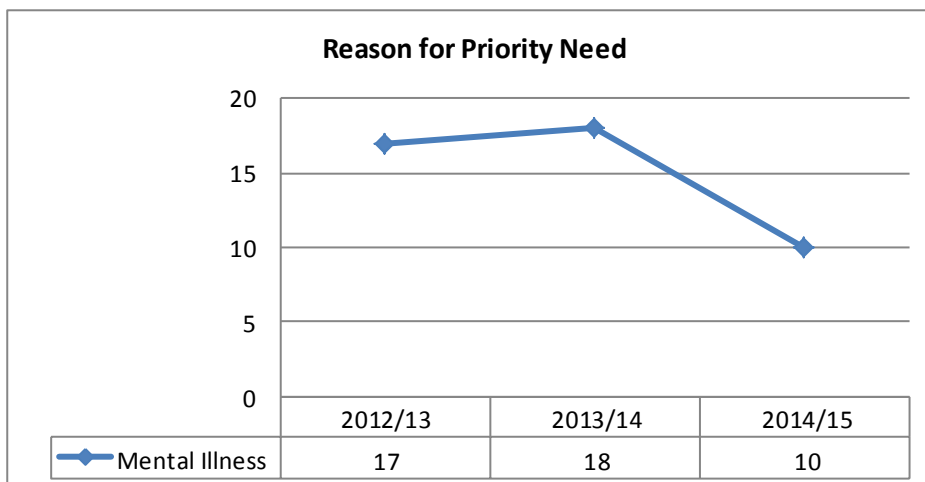
Case studies showed that often young people do not leave home simply because of arguments with their parents, but that they were often living in families where there were issues with problems such as substance abuse, unemployment, depression, bereavement or domestic violence. To quote from the report:

‘The provision of accommodation can be life-changing for some young people, but accommodation alone will never be sufficient to help them resolve all the issues they face. They need support from different services and in many cases different services will have to work closely together to ensure that young people can move into adulthood successfully.’

6.2.3 Priority Need – Vulnerable due to Mental Health

Chart 8 below shows that the number of households owed the full homeless duty due to vulnerability, as of consequence of mental illness, has declined over the three year period. However, the proportion of all homeless acceptances for this reasons has remained relatively consistent, particularly over the last two years at 9% and 8% respectively for the financial years 2013-2014 and 2014-2015. This is reflective of the national statistics for England as a whole, which average at 8%.

Whilst the number of people whose priority need was established through mental illness are small, the costs to the individual and social care and health services are considerable, particularly in a predominately rural county such as Herefordshire.



The MEAM (Making Every Adult Matter) submission²³ states that whilst it is recognised that homelessness is an extreme form of social exclusion, which has a substantial detrimental impact on the health of individuals, homeless people still often experience considerable difficulty in accessing health care.

The document further claims that, in particular, homeless people face inequalities in accessing mental health services, yet their mental health can be exacerbated as a result of homelessness and mental ill health can itself be a risk factor in homelessness.

A secure, affordable home is essential in supporting positive mental health and emotional wellbeing and, as a consequence, reducing the overall demands on expensive health and social care services.

This finding is reiterated in the 'Five Year Forward View Mental Health Taskforce: Public Engagement Findings',²⁴ which states that:

'Many people discussed the importance of addressing the broader determinants of good mental health and mental health problems, such as good quality housing, debt, poverty, employment, education, access to green space and tough life experiences such as abuse, bullying and bereavement.'

The council's Housing Solutions Team works closely with mental health and a supported housing provider in Herefordshire to help prevent homelessness amongst people who have a co-existing mental health and substance use issues.

6.2.4 Priority Need – Vulnerable due to Domestic Abuse

Homelessness acceptances, where priority need has been established as a consequence of domestic abuse, have decreased over the last three years as follows:

- 2012-2013 - 14 households
- 2013-2014 - 6 households
- 2014-2015 – 0 households

This should not be taken to mean that incidents of domestic abuse have declined in the country or in England as a whole, but is rather a reflection of homelessness prevention and relief activity. Depending on each circumstance this may mean the provision of alternative accommodation or putting in place measures to enable the household to remain safety in their current accommodation.

In addition, domestic abuse is still largely a hidden crime. Those who have experienced abuse from a partner or ex-partner will often try to keep it from families, friends, or authorities. Whilst domestic violence is most commonly experienced by women and

²³ Submission to the Mental Health Taskforce on Multiple Needs, June 2015

²⁴ Report from the Independent Mental Health Taskforce for NHS England, September 2015

perpetrated by men, men can also sometimes be victims in both gay and heterosexual relationships.

- In Herefordshire, in the year up to September 2014, calls to the Women's Aid Helpline totalled 4,193, an increase of 42% on the previous year.
- In 2014-2015, 316 children were involved in MARAC (Multi-Agency Risk Assessment Conference) cases, a 59% increase from the previous year. In the same period, West Mercia Women's Aid also reported an 18% rise in the monthly average number of children in their services from 122 in 2013-2014 to 147 in 2014-2015.

The Herefordshire Domestic Violence and Abuse (DVA) Needs Assessment,²⁵ states that DVA has a huge impact on society. It causes pain and suffering for the victim and their family, but also has a significant cost to public services and the local community. It is often a hidden crime, with victims reluctant to report their experiences.

Domestic abuse affects people in a number of ways, including poor physical and emotional health including, physical injury, homelessness, loss of income or work and isolation from families and friends. As a result of witnessing domestic abuse, children can experience both short and long term cognitive, behavioural and emotional effects. The consequences are not only personally damaging, but also have very significant financial costs.

The following are headline conclusions from the Herefordshire's Needs Assessment:

1. Domestic violence and abuse is prevalent across all of society and across the whole of the county.
2. Almost anyone is vulnerable to becoming a victim of domestic violence, although there are some scenarios which put the victim at higher risk.
3. By the time children reach secondary school, as a consequence of exposure to domestic violence and abuse, many have already developed inappropriate behaviour and attitudes to such abuse, as well distorted perceptions on healthy relationships.
4. Survivors do not experience violence and abuse in silos and neither should agencies respond in silos.
5. There is a strong correlation between domestic violence and child abuse.
6. Domestic violence frequently co-exists with alcohol, substance abuse and mental health problems, although these are rarely causal factors. Victims with multiple risk factors are often the most problematic to provide effective support.
7. For many agencies, victims only become engaged or are engaged with, at the time of crisis. This can lead to a 'revolving door' syndrome.

²⁵ Herefordshire Council Research Team & Herefordshire Community Safety Partnership, July 2013

Nationally:

- One incident of domestic violence is reported to the police every minute.
- One in seven children and young people under the age of 18 will have experienced living with domestic violence.

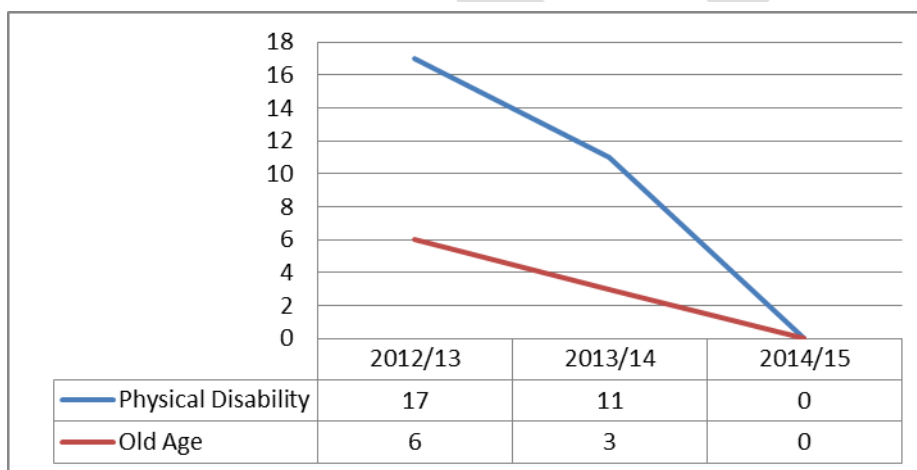
At the time of writing there were no spaces available in the Herefordshire refuge and no refuge spaces and no safe houses available across Worcestershire.

Funding is being sought from the HCA to build a new refuge, which if approved would have nine self-contained apartments.

6.2.5 Priority Need – Vulnerable due to Physical Disability / Older Person

Chart 9 below shows that for the past three years very few accepted homeless households were in priority need because of physical disability or old age and that there were no acceptances for these reasons during the 2014-2015 financial year.

This does not necessarily mean that homeless is not issue or does not happen, but is rather a reflection of work done around homeless prevention.



6.2.6 Priority Need – Vulnerable due to having been in custody/on remand

Over the last three years only one person has been accepted as having a priority need established through having been in custody or on remand. This was for the quarter January – March 2015.

‘Better together: Preventing Re-offending and Homelessness’,²⁶ identifies the significant contribution of homeless services to the prevention of re-offending. The report, the result of 12 months research, identifies the complex links between homelessness and re-offending.

²⁶ Homelessness Link, September 2011

Data quoted in the report shows that amongst people who are homeless there is a vast over-representation of offending backgrounds.

- Over 75% of homelessness services in England support clients who are prison leavers. One in five clients using homelessness services has links with the probation service.

In turn, homelessness increases the chances of re-offending.

- Ex-prisoners, who are homeless upon release, are twice as likely to re-offend as those with stable accommodation. Offenders, who are homeless upon entering prison, have a much higher reconviction rate within one year of release, with 79% being reconvicted, compared to 47% who have accommodation.

The report also identifies the above average incidence of mental ill-health amongst offenders both in prison and the community. In addition, mental health needs among those in contact with the criminal justice system are often complex:

- 72% of male and 71% of female prisoners have two or more mental ill-health problems, including schizophrenia, bi-polar, depression, anxiety, personality disorder, alcohol misuse and drug dependence. This against 5% and 2% respectively for the general population.

After leaving prison, people with mental health difficulties still require support to avoid relapses and to make sure they can comply with the conditions of their release and any supervision requirements.

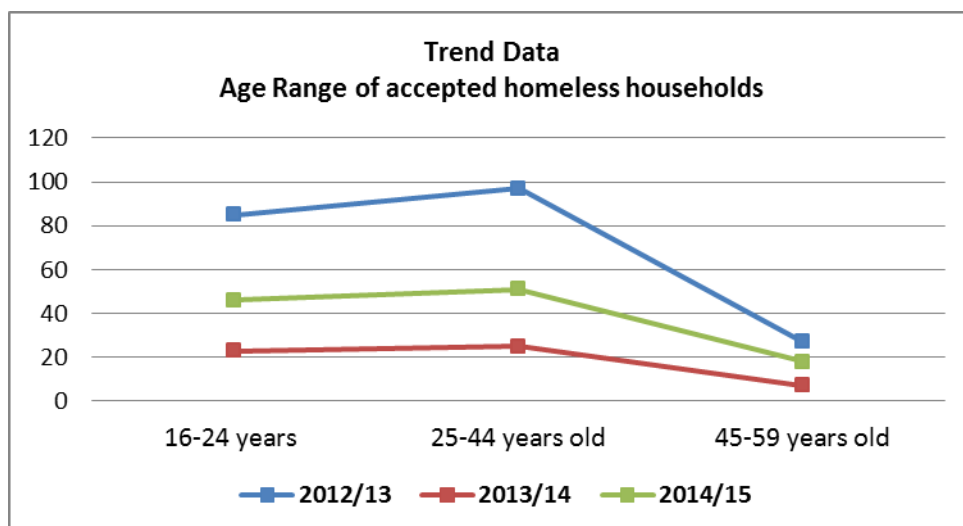
6.2.7 Priority Need - Vulnerability due to Substance Dependency

In 2012-2013, two households were accepted as being homeless and having a priority need through vulnerability due to alcohol dependency and two households as a result of vulnerability due to drug dependency. From 1st April 2013 to 31st March 2015 there has been no acceptance for this reason.

6.3 Age of Statutory Homeless Households

Chart 10 below, shows that, consistently over the three year period, the majority of accepted households were aged between 25-44 years (53%), which is in line with the national average at 58%. Acceptances for 16-24 year olds were marginally lower (47%) although significantly higher than the national average of 24%.

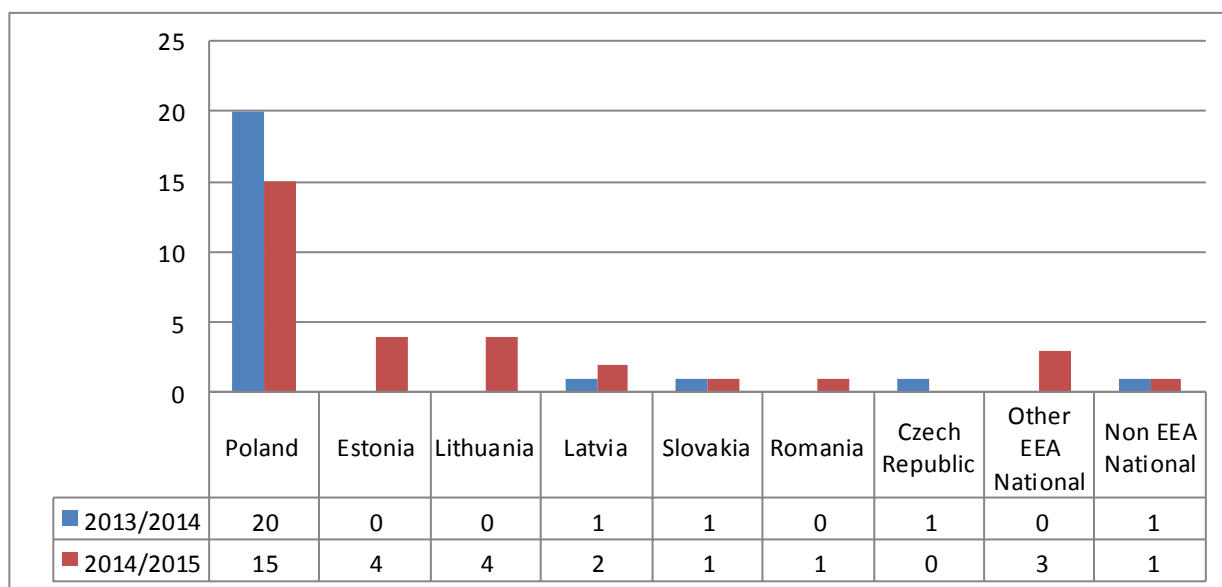
Only one household, over the period, contained a person who was between 65-74 years.



6.4 Foreign National Households

Chart 11 below shows the country of origin and the numbers of non-UK households who were accepted as being owed a full duty under the homelessness legislation during the 2013-2014 and 2014-2015 financial years. As can be seen, for both years, Poland was the primary country of origin.

The number of foreign national households accepted as homeless in Herefordshire rose from 12% of all acceptances in 2014-2014 to 27% in 2014-2015. The England average acceptance rate for 2014-2015 at 13% was considerably lower.

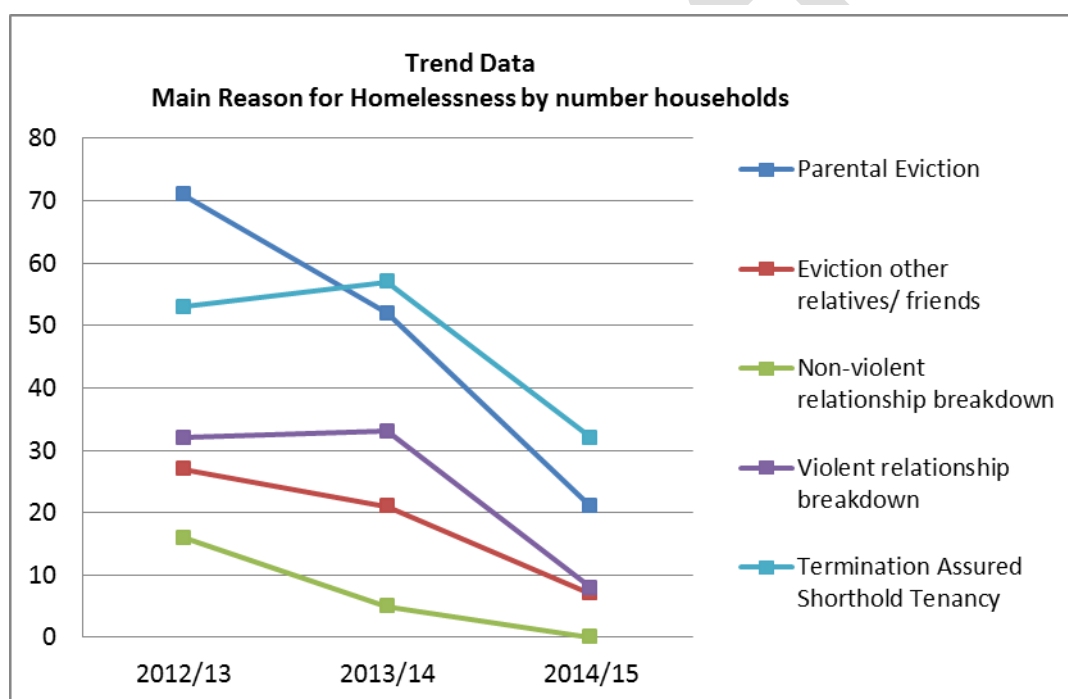


6.5 Accepted Homeless Households - Reason for Homelessness

6.5.1 Termination of Assured Shorthold (AST) Tenancy:

The most frequently occurring reason for homelessness for the last two financial years has been termination of Assured Shorthold Tenancy with a private landlord. 57 households (34% of total) became homeless for this reason in 2013-2014 and 32 households (47% of total) in 2014-2015. As shown in Chart 12 below.

This is substantially higher than the average national figure, even though the increase in statutory homeless acceptances in England over the last six years has resulted from the sharply rising numbers made homeless for this reason. Between 2009-2010 and 2014-2015 the figure more than doubled from 11% to 26%.²⁷



The rising levels of homelessness due to termination of Assured Shorthold Tenancy should be seen in context of the shift in housing tenure in Herefordshire from owner occupation to the private rented sector over the last decade (2001-2011) rising from 9% to 14%.²⁸ This reflects the national trend, where the number of households living in the private has almost doubled over the ten year period up to 2013-2014 to reach 4.4 million households.

There have been concerns that the implementation of a £20,000 benefit cap (outside London) from April 2016 could potentially increase homelessness through higher levels of rent arrears in both the private and social rented sector.

²⁷ The Homelessness Monitor, Crisis, February 2015

²⁸ Herefordshire Census data 2011

‘As the cap is initially being implemented by “squeezing” Housing Benefit entitlement, housing organisations in both the social and private rented sectors expressed concern about its potential impact on rent arrears, evictions and increases in homelessness amongst those affected.’²⁹

6.5.2. Other main reasons for homelessness

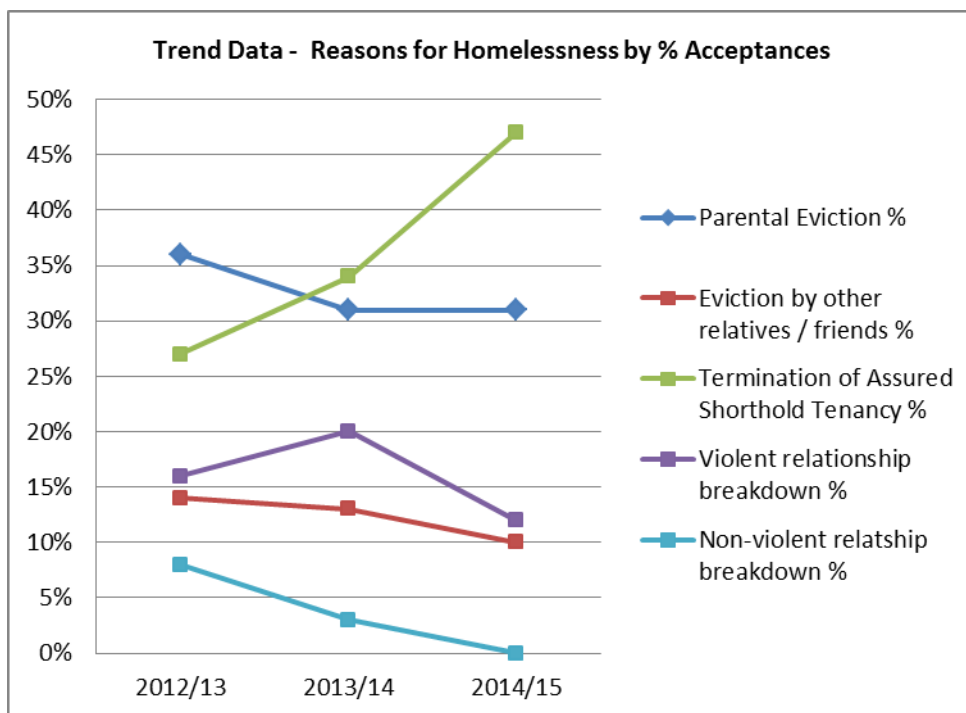
Table 1 below shows other main reasons for statutory homelessness in Herefordshire:

	Termination AST Tenancy	Parental Eviction	Violent Relationship Breakdown	Eviction other Rels/Friends	Non-violent Relationship Breakdown
2012/13	53	71	32	27	16
2013/14	57	52	33	21	5
2014/15	32	21	8	7	0

- Parental eviction was the highest cause of statutory homelessness in 2012-2013 at 36% of all acceptances. By 2014-2015, however, the number of households accepted for this reason had declined by 70% to 21 households.
- Violent breakdown in relationship has consistently been the third highest cause of homelessness over the three year period at 32 households in 2012-2013, reducing to 8 households in 2014-2015 – a reduction of 75%.
- Eviction by friends / other relatives (non-parents) although a lesser cause of homelessness in Herefordshire has still been significant over the three year period, reducing from 27 households in 2012-2013 to 7 households in 2014-2015.
- Homelessness due to non-violent breakdown in relationship, as a reason for homelessness, has declined from 16 households in 2012-2013 to no households in 2014-2015.

Chart 13 below shows that termination of Assured Shorthold Tenancy is **the only cause of homelessness that has increased proportionately** over the three year period from 27% of total to 47%. The range of other reasons have declined or remained static

²⁹ House of Commons Briefing Paper, The Benefit Cap, July 2015



It should be born in mind that the above figures will be influenced by the authority's successful homelessness prevention and homelessness relief activity. In addition, it may be that termination of Assured Shorthold is more difficult to address in the time available between notification of threatened homelessness and actual homelessness.

The DCLG Statutory Homelessness Statistical Release, June 2015 states that, for England as a whole, the end of an Assured Shorthold Tenancy has been an increasingly frequent cause of loss of last home over the last six years.

Data quoted in the Homelessness Monitor 2015³⁰ reinforces this, claiming that almost three quarters of the increase in homelessness acceptances over the past four years is attributable to the sharply rising numbers made homeless from the private rented sector.

This is not, perhaps, surprising given that the number of households living in the private rented sector has doubled in the last ten years to reach 4.4 million households by 2013-2014.

7. THE ROLE OF THE PRIVATE RENTED SECTOR (PRS)

The PRS is now the largest rental sector in England and is increasingly significant as both a potential solution to homelessness (by providing housing opportunity to households who might otherwise become homeless) and also as a cause of homelessness (with loss of private tenancies now the single largest reason for statutory homeless acceptances nationally).

³⁰ Crisis, February 2015

However, the ability of the PRS to house those who are homeless and/or on low incomes is heavily dependent on housing benefit and access is, therefore, constrained by government welfare reform policy.

The following quotation from research undertaken for the 'Homelessness Monitor,' February 2015 is illustrative:

'We're definitely seeing more and more homelessness applications from people because their private tenancies are ending. And that's happening either because they want to sell or they know that if they get rid of those tenants they can charge a much higher rent.' (A Local Authority key informant in a rural authority).'

7.1 Discharge of duty to Homeless Households through use of private-rented accommodation.

Since November 2012, the Localism Act 2011 enabled local authorities to discharge their duty to accepted homeless households by using private rented accommodation in accordance with the legislation and supplementary DCLG guidance.³¹ These changes allowed local authorities to end the main homelessness duty with a private rented sector offer, without the applicant's consent. The duty can only be ended in the private rented sector in this way with a minimum 12 month assured shorthold tenancy. A further duty arises if a household placed in the private rented sector becomes unintentionally homeless within 2 years and reapplies for assistance.

In England, during the 2013-2014 financial year, 1,040 households accepted an offer of accommodation in the private rented sector.

In Herefordshire the figures were:

- 11 household in 2013-2014
- 7 households in 2014-2015

This figure includes those who were in temporary accommodation arranged by the council, and those who were still living in the accommodation from which they had been accepted or were in temporary accommodation that they had arranged themselves. It excludes those whose homelessness was prevented or relieved, as identified below.

In February 2014, Shelter and Crisis published the final report of a study conducted between 2010 and 2014 into the long-term outcomes and wellbeing of vulnerable homeless households resettled into the private rented sector.³²

The objective of the research was to rectify the dearth of evidence about people's experiences of the private rented sector, by tracking 128 survey participants over a 19th month period. The authors claim that:

³¹ Supplementary Guidance on the homelessness changes in the Localism Act 2011 and on the Homeless (Suitability of Accommodation (England) Order 2012

³² A Roof Over My Head: The final report of the Sustain Project, February 2014

'The research has demonstrated that there are significant problems in the PRS including regulation, enforcement practices and a lack of security for tenants. The PRS presents challenges for any vulnerable people resettled into it and is not currently functioning in a way which supports their wellbeing. It is clear that the PRS is not a suitable housing option for everyone, and there are particular questions about its suitability for people with vulnerabilities.'

8. HOMELESSNESS PREVENTION AND RELIEF

The DCLG defines homelessness prevention and relief in the following terms:

- Homelessness prevention involves providing people with the means to address their housing and other needs to avoid homelessness. This is done by either assisting them to obtain alternative accommodation or enabling them to remain in their existing home.
- Homelessness relief occurs when an authority has been unable to prevent homelessness, but helps someone to secure accommodation even though the authority is under no statutory obligation to do so.

The DCLG clearly encourages all local authorities to offer prevention assistance to all households, who approach as being at risk of homelessness in the near future, including single persons and others who may not fall within a priority need category. Providing prevention assistance cannot, however, be used to avoid statutory obligations.

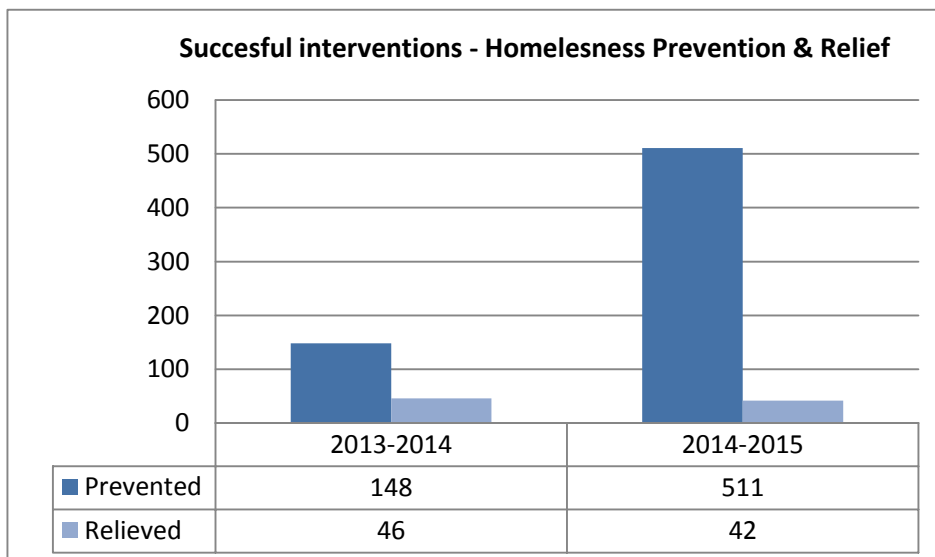
Aggregated national P1E data shows that activity under statutory homeless provisions has accounted for only a small proportion of all local authority homelessness work for a number of years, with informal homelessness prevention accounting for more than 75%. This situation is reflected locally with, in the region of, 74% of homelessness activity being logged as prevention work and statutory homeless cases at 26% of total.

In the 'Homelessness Monitor'³³ it is suggested that, as a reliable indicator of the changing scale of homelessness in recent years, the statutory homeless statistics now have limited value. It is further noted that, whilst most local authorities responding to a survey stressed that they still informed all relevant households of their legal right to make a homeless application, it is clear that the housing options / prevention route was being strongly encouraged across England.

As Chart 14 below shows, the council has been very effective in its homeless prevention activity over the last two years, with 148 households prevented from becoming homeless in 2013-2014 and 511 in 2014-2015. This represents a 245% increase in success rate for homeless prevention over the two year period.

³³ Crisis, February 2015

In England in 2014-2015, 93% of successful homeless interventions were preventions and 7% were homelessness relief. Herefordshire's figures are consistent with this at 92% and 8% respectively.



8.1 Type of homeless prevention activity:

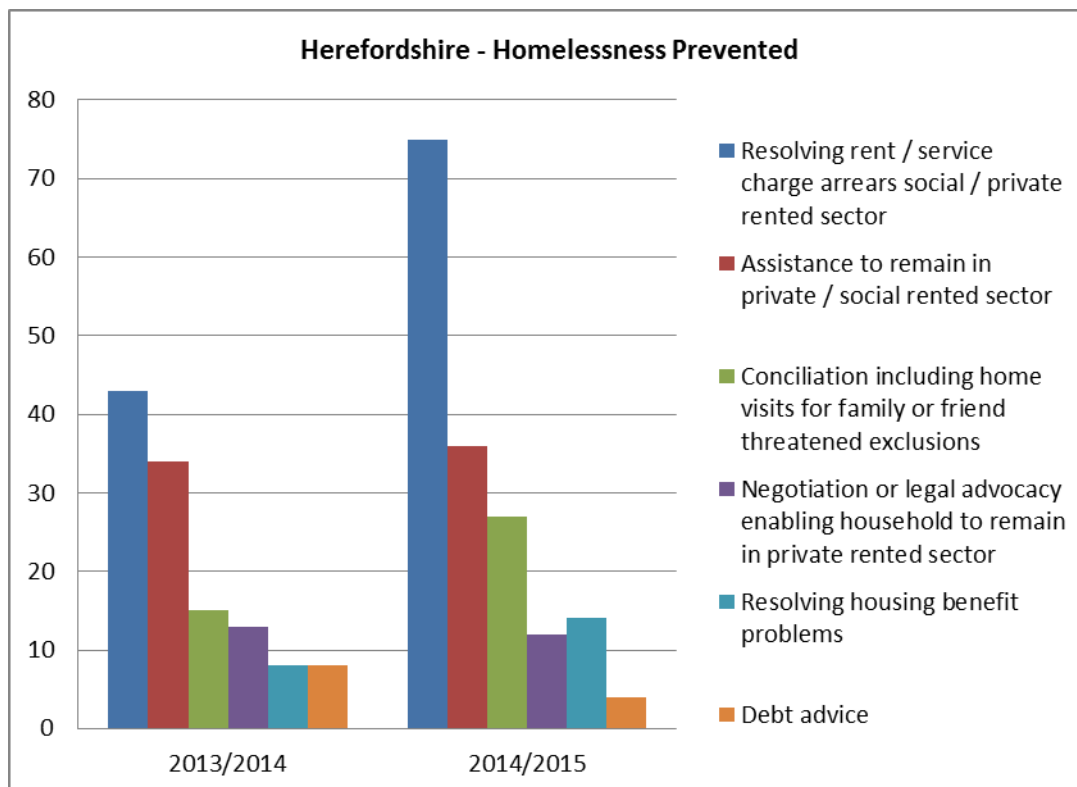
Of the 2014-2015 prevention outcomes for homeless households in Herefordshire, 30% (153 households) were assisted to remain in their current accommodation, which is lower than England as a whole at 53%. The remaining 70% (358 households) were assisted to find alternative accommodation.

As illustrated in Chart 15 below, of the cases who were assisted to remain in their own homes, the most common preventative actions were around 'resolving rent or service charge arrears in the social or private rented sector.'

The next most successful intervention recorded on the P1E statutory return was 'provision of assistance to remain in the private or rented sector,' a 'catch-all' classification which, unfortunately, is too broad to be of any significant analytical value.

42 threatened homelessness cases were alleviated through conciliation, which enabled the household to remain in their existing accommodation with family or friends.

The Herefordshire figures differ somewhat from national averages in that resolving housing benefit problems has been the signal most frequent type of homeless prevention assistance for the last two years at 22% in 2013-2014 and 24% in 2014-2015. It should be borne in mind, however, that as the P1E classifications are quite general, variations in local recording practice are likely to have a significant impact on the national picture.



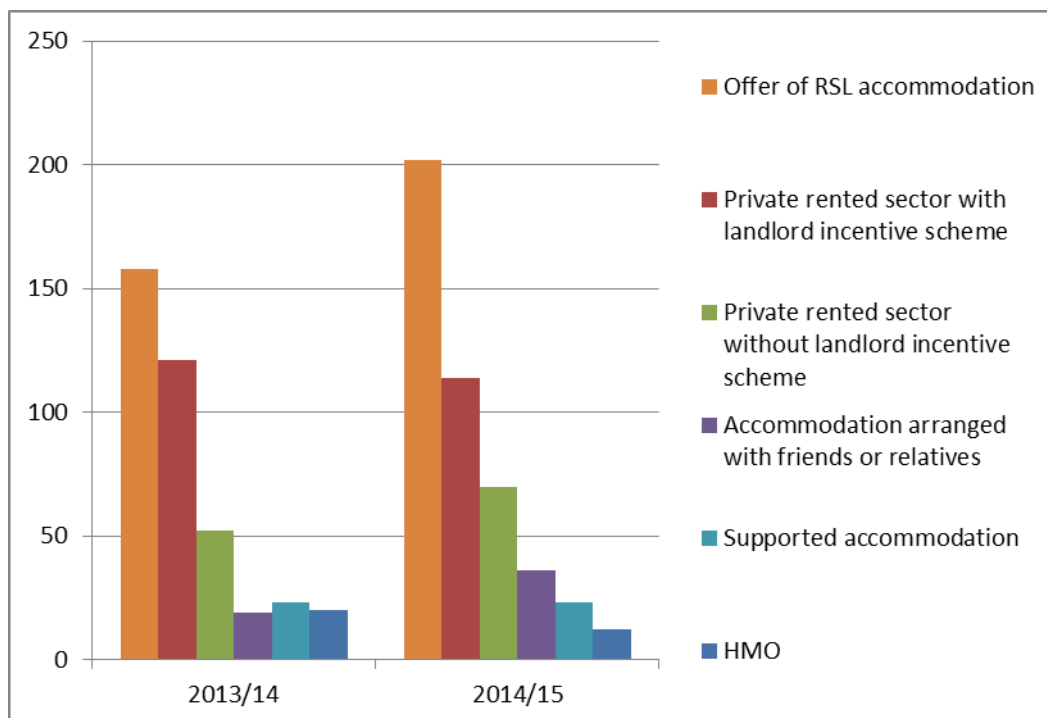
8.2 Homelessness prevention/relief through the provision of alternative accommodation

Of the households who were assisted to find alternative accommodation over the two year period in total, 360 households accepted an offer of accommodation from a Registered Social Landlord (RSL). The figures also show, however, significant use of the private rented sector at 357 households in total whose homelessness was prevented or relieved through assistance to access accommodation in this sector.³⁴ This does not include the 32 households who were assisted to gain access to private rented sector houses in multiple occupation (HMOs) and who are likely to be homeless single people and couples without children.

The data would tend to suggest that access to the private rented sector is a realistic option for some households who are homeless or at risk of homelessness, although more specific analysis is required around household type and income etc., against the profile of the accommodation that is being provided.

Chart 16 below illustrates the most significant types of successful homeless prevention and relief activity in Herefordshire between 2013 and 2015.

³⁴ For clarity, this figure relates to homelessness prevention and relief as distinct from the 11 households in 2013-2014 and the 7 households in 2014-2015 where a statutory duty was accepted and fulfilled through discharge of duty through a private-rented sector offer of accommodation.



9. NON-PRIORITY NEED HOUSEHOLDS

Where households are found to be homeless, but not in priority need, the council must make an assessment of their housing need and provide advice and assistance to help them find accommodation for themselves. There is no statutory duty to provide accommodation, whether temporary or permanent, even though the person may actually be street homeless/rough sleeping or hidden homeless ‘sofa sufferers’ relying on the goodwill of friends or relatives.

The DCLG Statistical Release for January – March 2015 shows that in England 19% of households who made a homeless application were found to be homeless, but not in priority need.

For Herefordshire, as shown in Table 2 below, the proportions of households found to be not in priority need to the numbers applying are much lower than the national figure.

Eligible Not in priority need		
	Number	%
2012/13	28	8%
2013/14	40	12%
2014/15	20	9%

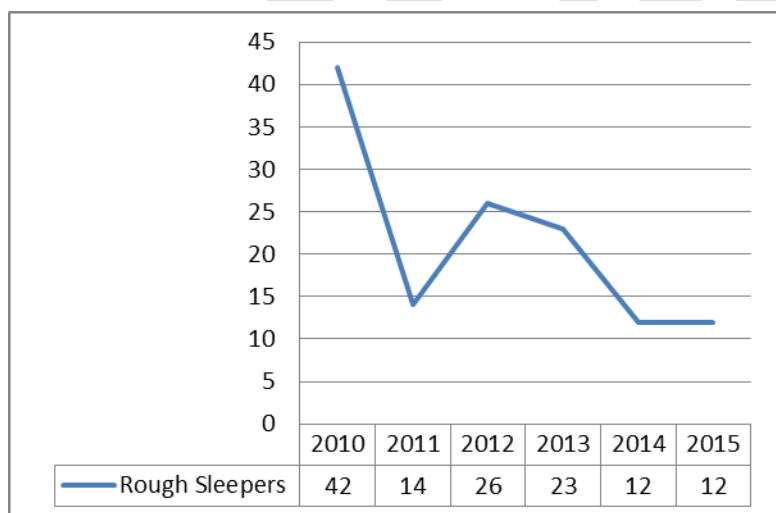
10. ROUGH SLEEPERS

Rough sleepers are defined by the DCLG as people sleeping / bedding down in the open air, on the streets, in tents, doorways, parks and bus shelters etc. It also includes those in buildings or other places not designed for habitation, such as stairwells, barns, sheds, car parks and makeshift shelters such as cardboard boxes.

Rough sleeping counts and estimates are single night snapshots of the number of people sleeping rough in local authority areas on any night between 1st October and 30th November. Local authorities decide whether or not to carry out a count or an estimate based upon their assessment of whether local rough sleeping problems justifies this. Local authorities are encouraged to gain intelligence for counts and estimates from outreach workers, the police, the voluntary sector and members of the public and to submit the count or estimated figures by completing the DCLG rough sleeping statistical return.

It is clear that accurately counting or estimating the number of rough sleepers within the local authority area is inherently difficult. Key issues here include the problem that no street count can ever be wholly comprehensive and that, given the shifting populations involved, 'snapshot' counts inevitably understate the numbers of those affected over a given time period.

Chart 17 below shows the overall trend in the count of rough sleepers in Herefordshire between 2010 -2014. The count is undertaken during November.



10.1 St Peter's Winter Shelter, Hereford

St Peter's Winter Shelter in Hereford has opened every year for the past seven years. The service is provided in accordance with DCLG and Homeless Link³⁵ good practice guidance on Severe Weather Emergency Protocols (SWEP).

³⁵ SWEP and extended winter provision: Engaging rough sleeping in winter, September 2015

Extreme cold can cause serious health problems and death for those who are exposed overnight or for long periods of time. Every local authority should have a Severe Weather Emergency Protocol (SWEP), which is instigated, at minimum, when the temperature is forecast to drop to zero degrees zero degrees Celsius (or below) for three consecutive nights.

SWEP operates outside usual homelessness eligibility criteria, which trigger an authority's duty to provide temporary accommodation. It should include people who may otherwise be excluded or not entitled to service, for example:

- People with no recourse to public funds.
- People who may have previously been banned.
- People with no local connection to the area.

Whilst local areas should have adequate provision to prevent rough sleeping at any time of year, the winter period often presents greatest risks to people's health. It also provides increased opportunities to engage with entrenched rough sleepers and other hard-to-reach groups, who may be more willing to do so during periods of extreme cold.

It is important that the demographic and support needs data of people using the SWEP service is recorded, monitored and shared, with consent and in accordance data protection requirements. This enables more efficient health and support service referral processes and promotes effective future planning.

During the 2014-2015 financial year, the shelter opened to men on 1st December 2014 and to women on 1st January 2015, following the installation of separate female shower and WC facilities. The shelter, which had a maximum capacity of 16 men and three women, closed on March 29th 2015.

The following information was collected:

- A total of 60 men used the shelter, 42 UK and 18 non EU residents.
- The overall average of nights spent as the shelter was 15, but this ranged from between 1 to 92 nights.

Residents reported a high incidence of mental and/or physical health problems, drug and/or alcohol misuse and interaction with the Criminal Justice System.

Physical health problems included lung disease, cirrhosis, alcoholic neuropathy and alcoholic seizures. Self-reported mental ill health included schizophrenia and mania.

Where agreed, the Street Outreach Worker made referrals to health services and worked with residents to promote access to more stable accommodation.

11. HIDDEN HOMELESSNESS / CONCEALED HOUSEHOLDS

Hidden homelessness generally refers to households, who may be in a similar housing situation to those who apply to local authorities as homeless, but who do not do so.

Concealed households are family units or single adults living in the homes of other households and, who may wish to live separately given appropriate opportunity.

Estimates indicate that there were 2.23 million households containing concealed single persons in England in 2013. In addition to this there were 265,000 concealed couples and lone parents. Overall this is equivalent overall to around 12% of all households in England.³⁶

Census data for 2011 showed that, in Herefordshire, there were 850 concealed families. This, which represents an increase of 87% since 2001 compared to 70% nationally, would indicate that there is considerable tenure-wide housing pressure in the county

12. HOUSING ADVICE IN HEREFORDSHIRE

The homelessness legislation, Part 7 of the Housing Act 1996, places a general duty on housing authorities to ensure that advice and information about homelessness and preventing homelessness, is available to everyone in their district free of charge. The duty is provided through the council's Housing Solutions Team.

Herefordshire Council also commissions WISH (Wellbeing Information and Signposting for Herefordshire), which can signpost people to the Housing Solutions team as well as to any associated services and local activities which may help with other issues they may have.

13. FUTURE LEVELS OF HOMELESSNESS

Whilst there are inherent difficulties in predicting future levels of homelessness and threatened homelessness in Herefordshire, these will inevitably be influenced by the prevailing economic environment, national austerity and substantial local budgetary constraint.

The implementation of the welfare reform agenda could impact adversely on low income groups and those vulnerable to homelessness and housing instability. In addition, it is likely that the Housing and Planning Bill will, in time, reduce access to good quality affordable housing for these households. Restrictions in funding streams are also being felt by other statutory agencies and voluntary and community groups who have an interest in homelessness prevention.

Given the above landscape, whilst the council will continue to direct its efforts to homeless prevention, there is a limit to what prevention can achieve if there is simply not enough affordable accommodation in the area to address housing need.

³⁶ Homelessness Monitor England, Crisis, February 2015

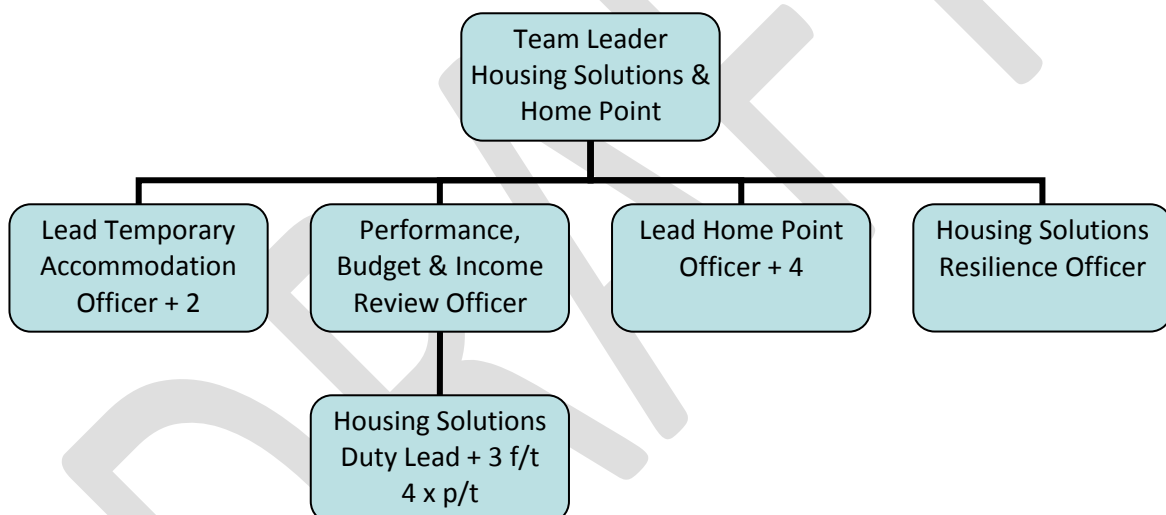
14. REVIEW OF RESOURCES AND ACTIVITIES THAT CONTRIBUTE TO HOMELESSNESS PREVENTION AND SUPPORT

As previously identified, the homelessness legislation, Part 7 of the Housing Act 1996, places a general duty on housing authorities to ensure that advice and information about homelessness and preventing homelessness, is available to everyone in their district free of charge.

The legislation also requires authorities to assist individuals and families who are homeless or threatened with homelessness and apply for help.

14.1 Housing Solutions Team

In Herefordshire, the duty to provide advice homelessness advice is fulfilled by the Housing Solutions Team, which is located in the Adults and Wellbeing Directorate incorporating housing and adults social care. The team structure and number of posts is illustrated in diagram 1 below:



There are a number of specialists within the Housing Solutions Team focusing on homeless prevention and relief, including:

- Private Sector Accommodation Officer.
- Dedicated Officer, who speaks five languages and focusses primarily on homeless prevention amongst European Foreign National households.
- Officer with specific responsibility for keeping up-to-date with housing, homelessness and related legislation and case law and ensuring that any developments are translated into operational practice.
- Dedicated officer for liaison with West Mercia Women's Aid.
- Housing Solutions Resilience Officer with dedicated responsibility for multi-agency cases.

- Local Welfare Provision Officer.
- Rough Sleeper Outreach Worker – currently externally funded on a fixed term contract but managed within the Housing Options Team.
- Housing Discharge Worker – currently externally funded on a fixed term contract but managed within the Housing Options Team.

14.2 Hospital Discharge Worker and Rough Sleeping Outreach Worker

The Hospital Discharge Worker (HDW) and the Rough Sleeping Outreach Worker (RSOW) are (at the time of writing) both currently employed externally, but managed within the council's Housing Solutions Team.

St Peter's Night Shelter secured funding in September 2013 for the HDW post through the Department of Health (DoH) Homeless Hospital Discharge Fund.

St Paul's Hostel, Worcester, secured funding through the SASH Project, (Services Addressing Single Homelessness), for the RSOW post. The post holder is employed by St. Paul's but works closely with Housing Solutions Team to support people across Herefordshire.

The RSOW post was funded through the SASH Partnership, formed between Herefordshire and Worcestershire councils, to help existing rough sleepers to find and sustain stable accommodation. There is also a strong focus on preventing street homelessness amongst single people who are at risk.

The HDW and the RSOW work very closely together and jointly support more than 100 individuals at any time. In the year to October 2015, permanent housing solutions were found for 122 single homeless people.

The RSOW:

- Visits food banks, prisons, police stations and other locations to identify people at risk and to work with them to find appropriate housing solutions.
- Has developed a wide range of partnership links with professional and voluntary organisations to support outreach and resettlement.
- Provides and/or enables extensive follow-up support to promote tenancy sustainment once accommodation is found.
- Submitted a successfully bid for the Prevention of Reoffending Fund and secured a grant of £10,500.

The HDW has developed a very close working relationship with colleagues in hospitals, attending A&E daily, undertaking visits to wards and participating in various multi agency forums.

Should future funding not be found to continue these two posts, the number of people presenting as homeless are likely to increase significantly. This will put additional resource pressures on the service, which could not be sustained and may require the use of B&B as emergency accommodation for the first time since 2012.

14.3 Families First

The Families First Programme in Herefordshire is a local programme with the ambition to make lasting positive changes to the lives of some of the most vulnerable families and communities across Herefordshire. It is Herefordshire's approach to the national Troubled Families Programme, which was initially a three year programme to 2014/15 but has been extended for an additional five years from 2015/16.

The Families First programme aims to work with families who locally are a cause for concern amongst local partners, cause high costs to the public purse and have problems relating to:

- Parents & children involved in crime or anti-social behaviour.
- Children who have not been attending school regularly.
- Children who need help.
- Adults out of work or at risk of financial exclusion and young people at risk of worklessness.
- Families affected by domestic violence and abuse.
- Parents and children with a range of health problems.

The service supports the identification of families, coordinating support with partners, monitoring the achievement of outcomes for families, evaluating the impact of the programme on securing cost savings and avoiding costs for partners by reducing demand on public sector services.

The Programme is a key priority area of the Health and Wellbeing Board and the Children and Young People's Partnership. Support for vulnerable families forms part of the emerging priority areas of both the Health and Wellbeing Strategy and the Children and Young People's Plan.

14.4 External Services Supporting Homelessness Prevention

The following external homelessness prevention services have been procured. These commenced on the 31st August 2015 for a minimum of three years:

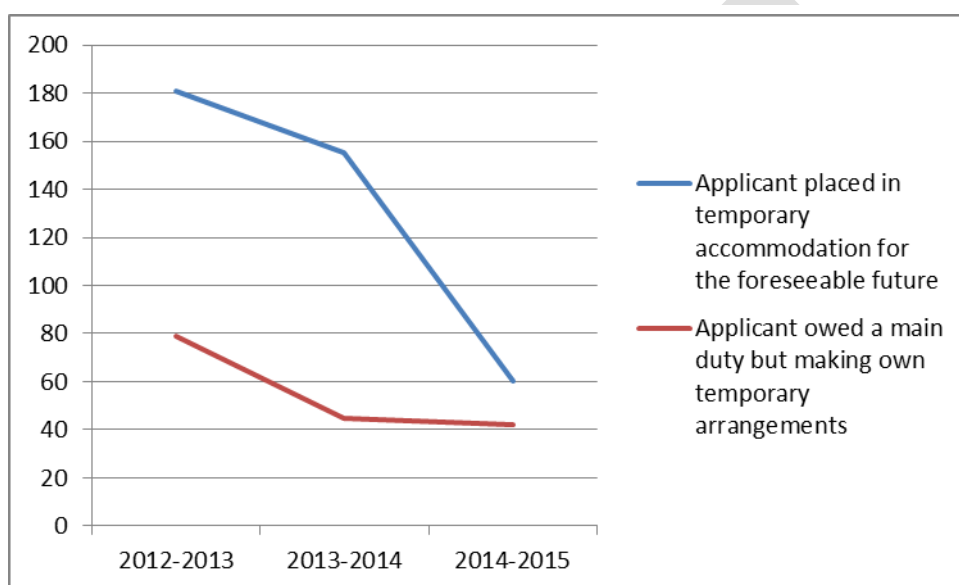
- Accommodation based housing support services for vulnerable people, over the age of 18 years, who are at risk of homelessness or homeless.
- Housing Related Floating Support Services for vulnerable people over the age of 18 years, who are at risk of homelessness or homeless, as a result of mental health issues, substance misuse, complex needs and/or a history of offending behaviour.'

15. USE OF TEMPORARY ACCOMMODATION

As can be seen from Chart 18 below the use of temporary accommodation has declined substantially over the last three years from 181 households during the 2012-2013 financial year to 60 households during 2014-2015. This represents a 67% decrease in usage.

At the same time accepted homeless households making their own temporary accommodation arrangements has also declined from 79 in 2012-2013 to 42 households in 2014-2015.

These statistics are reflective of the successful homeless prevention work carried out by the Housing Solutions Team, which circumvents the need to place homeless households in temporary accommodation, whilst a more permanent housing solution is found.



15.1 Changes to the way Temporary Accommodation is funded

It was announced in the November 2015 Comprehensive Spending Review that there will be changes to the way the management of temporary accommodation for homeless households is funded.

The management fee, currently paid retrospectively via housing benefit payments, will end from 2017-2018 and will be replaced by a stand alone grant paid to councils upfront. The government is encouraging councils to use this money flexibly to prevent homelessness.

This is, potentially, a positive move as it will allow councils to innovate to better meet the needs of homeless households. There are risks, however, as it effectively means a move from a demand-led system to a fixed budget. Whilst the overall budget is set to increase year on year until 2021 it is based on current levels of homelessness and may not incorporate increases if the demand for homeless temporary accommodation is greater than expected. This is a real possibility given the implications of the roll-out of the welfare reform agenda.

16. SOUTH WEST AUDIT PARTNERSHIP JUNE 2015

In June 2015 South West Audit Partnership undertook an audit of the homelessness service. The purpose of the audit was to provide an assurance level in relation to how effective the Council is in preventing homelessness and to ensure that the Council are fulfilling their duty of care in compliance with legislation.

Overall the audit found, through its evidence testing procedures, that Herefordshire Council is achieving its objectives of preventing homelessness through using a proactive approach.

17. HEREFORDSHIRE HOMELESSNESS FORUM

Representatives from the council attend the Herefordshire Homelessness Forum (HHF), which meets every two months, is well attended and has a wide representation from statutory and voluntary agencies and faith groups.

The Forum has, since its inception, made significant contributions to policy and practice for service providers. Its Vision Statement is:

‘Providing for the needs of homeless individuals and families across the county of Herefordshire.’

The Forum’s purpose and function include:-

- Enabling statutory and voluntary agencies to meet as equal partners.
- Comparing best practice across the county.
- Information sharing, and reviewing trends and forecasts.
- Acting as an independent "critical friend" to all bodies working in homelessness.

18. LINKS TO HOMELESSNESS PREVENTION STRATEGY 2016-2020

The analysis undertaken for this Homelessness Review has formed a robust evidence base for the development of the Homelessness Prevention Strategy objectives.

Homelessness can happen to anyone, but some people often face greater difficulty in accessing and maintaining a home. These include rough sleepers, young people, people with substance dependencies or mental health issues, people with challenging behaviours and people who are socially marginalised. For this reason we have focused our strategic objectives on helping those who face the greatest barriers in accessing and sustaining a stable home.

Successful delivery of these objectives will ultimately depend on effective co-ordinated action and commitment both within the council and across our statutory and voluntary sector partner agencies.

**HOMELESS PREVENTION
STRATEGY
2016-2020**

DRAFT

1. INTRODUCTION

The Homelessness Act 2002 requires every local authority to carry out a review of homelessness in their district every 5 years and to publish a Homelessness Strategy based on the findings of the review.

The legislation emphasises the importance of working strategically with social services and other statutory, voluntary and private sector partners in order to tackle homelessness more effectively.

The Homelessness Code of Guidance for Local Authorities, July 2006 states that the purpose of the review is to establish the extent of homelessness in the district, assess its likely demand in the future, identify what is currently being done and what level of resources are available for preventive and responsive work.

In December 2015, the Communities and Local Government (CLG) Committee announced an inquiry into the causes of homelessness, as well as the approaches taken by national and local government to prevent and tackle homelessness. The inquiry will include the effectiveness of the current legislative framework in England with a review of the different approaches taken in Scotland and Wales. The Homelessness Prevention Strategy will be reviewed in the light of any recommendations and/or changes arising from the inquiry.

Herefordshire's Homelessness Review provides an evidence base for the development of the Homeless Prevention Strategy objectives and should be read in conjunction with this strategy.

Homelessness can happen to anyone, but some people often face greater difficulty in accessing and maintaining a home. These include rough sleepers, young people, people with substance dependencies or mental health issues, people with challenging behaviours and people who are socially marginalised.

For this reason the strategic objectives are built around preventing homelessness and finding solutions for those who often face the greatest barriers in accessing and sustaining a stable home. The council will work towards achieving these objectives by 2020.

1.1. STRATEGIC OBJECTIVES

Objective 1:

Minimise rough sleeping and increase tenancy sustainment opportunities for rough sleepers and people with complex needs.

Objective 2:

Maximise homeless prevention activity by building on current success and promoting positive opportunities for homeless people.

Objective 3:

Help improve the health and wellbeing of homeless people and those who are at risk of homelessness.

Objective 4:

Ensure homeless people are able to access affordable housing and that support services are targeted effectively.

2. EQUALITY ACT 2010

Under the Equality Act 2010, public bodies such as Herefordshire Council must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Many factors combine to cause and contribute to homelessness. Homelessness, poor and insecure housing has adverse effects on the overall health and wellbeing of individuals and communities. Housing inequality also impacts on other factors such as income, education, health and wellbeing and life experiences.

In Herefordshire we have a strong commitment to promoting equality and tackling disadvantage. Herefordshire Council, along with other local organisations, has signed up to Herefordshire's Equality and Human Rights Charter. The Charter sets out an agreed vision of equality and human rights for the communities of Herefordshire.

3. HEADLINE FINDINGS FROM THE HOMELESSNESS REVIEW

Statistical data on homelessness in England is compiled by the Department of Communities and Local Government (DCLG) from statutory P1E Returns, which are submitted quarterly by local authorities. The P1E contains statistics on statutory homelessness, rough sleeping and homelessness prevention and relief.

The official figures do not, however, give a full picture of homelessness in England. They exclude those who are homeless, but who do not approach a local authority for assistance and households who do not meet the statutory criteria.³⁷

The following is a summary of some of the main findings as fully detailed in the accompanying Homelessness Review document.

³⁷ That is households who are (i) homeless or threatened with homelessness within 28 days, (ii) eligible for assistance, (iii) have a priority need, (iv) not homeless intentionally, (v) and have a local connection with the area (except in cases of domestic abuse)

3.1 Statutory Homelessness in Herefordshire: Totals and Priority Need

- The number of households making a formal homeless application reduced from 372 in 2012-2013 to 220 households in 2014-2015, a reduction of 40%. The number of households being accepted as statutorily homeless also reduced from 70% of total applications in 2012-2013 to 53% in 2014-2015.
- As identified in the Homeless Review document, the above should be understood in the context of a preventative approach, which reduces the number of households counted as making a formal homeless application. This should not, therefore, be taken to mean that homelessness is a decreasing issue in Herefordshire. Statistics show that 148 households were prevented from becoming homeless in 2013-2014 and 511 in 2014-2015.
- By far the most significant and consistent reason for the determination of 'priority need,' between 2012-2015, was that the household contained a dependent child or children. In total, 361 households were owed the full homeless duty for this reason.
- Household member being pregnant was the next highest reason, although significantly lower at a total of 78 households over the three year period. The local situation mirrors the national picture where the presence of dependent children established priority need in 67% of total cases, followed by household member pregnant at 7%.
- Over the three-year period 45 households were in priority need due to mental illness and 28 households consisted of or included a disabled person. At respectively 6% and 5% of total applications this is consistent with national figures.
- Whilst the number of people whose priority need was established through mental illness are small, the costs to the individual and social care and health services are considerable.
- In 2014-15 there were no homeless acceptances where priority need was established due to domestic abuse. As above, this does not mean that incidents are declining in the county, but that homelessness was prevented through effective joint working between the council's Housing Solutions Team and West Mercia Women's Aid (WMWA).
- Domestic abuse is still largely a hidden crime, but it is one that can sometimes have life-threatening consequences. In 2014, information suggests that 150 UK women were killed by men. One woman every 2.8 days.³⁸
- A research project undertaken by the London Metropolitan University, published January 2011, estimated the annual total financial costs of domestic violence in England to be £5.5bn.³⁹

³⁸ The 'Counting Dead Women Project'

³⁹ 'Islands in the Stream,' London Metropolitan University, January 2011

4. ROUGH SLEEPERS

Rough sleepers are defined by the DCLG as people sleeping / bedding down in the open air, on the streets, in tents, doorways, parks and bus shelters etc. It also includes those in buildings or other places not designed for habitation, such as stairwells, barns, sheds, car parks and makeshift shelters such as cardboard boxes.

Herefordshire's Rough Sleeper Count identified 26 rough sleepers in 2012. This figure had reduced to 12 people by the November 2015. Whilst there are a number of different reasons for this, the work of the Street Outreach Worker in helping rough sleepers off the streets and in sustaining accommodation has been very significant.

'It is vitally important to not lose sight of the scale of the human cost of single homelessness. The unique distress of lacking a settled home, which can be combined with isolation, high support needs and a disconnection from mainstream social and economic life, is perhaps the most damaging form of poverty and marginalisation that can be experienced in the UK.'⁴⁰

5. HIDDEN HOMELESSNESS / CONCEALED HOUSEHOLDS

Hidden homelessness generally refers to households, who may be in a similar housing situation to those who apply to local authorities as homeless, but who do not do so.

Concealed households are family units or single adults living in the homes of other households and, who may want to live separately given appropriate opportunity.

Census data for 2011 showed that, in Herefordshire, there were 850 concealed families. This, which represents an increase of 87% since 2001 compared to 70% nationally, would indicate that there is considerable tenure-wide housing pressure in the county.

6. STRATEGIC OBJECTIVES

The strategic objectives reflect the council's commitment to prevent homelessness happening whenever it is possible to do so and, where this has not been possible, to prevent it happening again.

Homelessness issues are complex, often requiring support and early intervention from many other service areas including health, social care, the wider criminal justice system, housing providers and voluntary and community organisations.

We are working in a challenging environment of significantly reduced council budgets, the uncertain impact of radical reforms to housing and social welfare policy and increasing pressures on local services. If we are to continue to build upon our existing success in preventing

⁴⁰ 'At what cost: An estimate of the financial costs of single homelessness in the UK, University of York, July 2015

homelessness there must be a commitment to do so from across the council and from external stakeholders and partner agencies.

6.1 OBJECTIVE 1:

MINIMISE ROUGH SLEEPING AND INCREASE TENANCY SUSTAINMENT OPPORTUNITIES FOR ROUGH SLEEPERS AND PEOPLE WITH COMPLEX NEEDS.

Rough sleeping is the most visible and damaging manifestation of homelessness.

As set out in the council's Homelessness Review document, homelessness places substantial costs on the NHS. In 2010 the Department of Health estimated that people who are sleeping rough or living in a hostel, a squat or sleeping on friends' floors consume around four times more acute hospital services than the general population, costing at least £85m in total per year.

Rough sleepers and people in unstable accommodation have significantly higher levels of mental and physical ill health, substance abuse problems and higher rates of mortality than the general population. In addition, they are more likely to die young. The data analysis in the 'Homelessness Kills,' research paper⁴¹ shows that rough sleepers and those in temporary homeless shelters have an average age of death of 47 years compared to 77 years for the general population.

'It is unacceptable that anyone has to sleep rough on the streets of Britain today. It is damaging to individuals and to communities. It is essential that tackling the issue remains at the heart of efforts to combat homelessness.'⁴²

ACTIONS:

1. Consolidate the Rough Sleeper Outreach Worker post and its funding through direct employment within the Adult Wellbeing Housing Solutions Team.
2. Investigate external funding opportunities to expand the assertive rough sleeper outreach service, focusing on preventative activity around known rough sleeping pathways and the provision of successful tenancy sustainment once suitable accommodation is obtained.
3. Consolidate the Hospital Discharge Worker post and its funding through direct employment within the Adult Wellbeing Housing Solutions Team.
4. Support Home Group in a Big Lottery Fund application to develop a Home Achievement Programme (HAP) project for Herefordshire through which homeless people with complex needs and those at risk of homelessness can be supported to address issues such as

⁴¹ 'Homelessness Kills: An analysis of the mortality of homeless people in early twenty-first century England,' University of Sheffield, September 2012

⁴² 'Let's Make the Difference,' Homeless Link, January 2015

substance misuse, domestic violence, offending behaviour, debt, tenant responsibilities and health matters.

5. Work with housing associations locally to establish opportunities for developing a 'housing first' pilot project for housing applicants undertaking HAP, and subject to a housing association exclusion policy, to be offered a social housing starter tenancy.
6. Continue to undertake annual rough sleeper assessments to inform our approach to 'No Second Night Out.'
7. 'Engage in joint working with other street based support services, as appropriate and continue to build on existing relationships with Integrated Offender Management.'
8. Strengthen joint working between the Hospital Discharge Worker and social care staff.

Case Study:

P was employed, living in settled rented accommodation and had a good relationship with his family. When he lost his job his life spiralled out of control, he became depressed and started using drugs. His need was such that, as soon as his welfare benefit payments were deposited, the money was withdrawn to buy any substance, which was available to him. His relationship with his family deteriorated and he was eventually evicted from his home. He began sleeping rough; his health deteriorated and he did not engage with any of the statutory services.

P became known to the Street Outreach Worker and slowly a relationship of trust was built. Through this contact he began to understand that he could change his life and, more importantly perhaps, that he really wanted to. The Street Outreach Worker found and successfully negotiated access to the type of substance rehabilitation support services that would give P the best chance of success.

After an uncertain start P reported that he was doing well. Relationships were being re-established with his family and he said that he was happy, feeling positive and looking forward to a future without addiction and criminality.

6.2 OBJECTIVE 2:

MAXIMISE HOMELESS PREVENTION ACTIVITY BY BUILDING ON CURRENT SUCCESS AND PROMOTING POSITIVE OPPORTUNITIES FOR HOMELESS PEOPLE.

*'We still categorise people in separate boxes defined by single issues. So a person who takes drugs to deal with childhood trauma, who falls into offending as a consequence, and loses their home when entering prison acquires three quite distinct labels. Each of these labels triggers a different response from statutory and voluntary systems, different attitudes from the public and media, different theoretical approaches from universities, different prescriptions from policy makers.'*⁴³

ACTIONS:

1. Identify the actions necessary to ensure that there is a corporate commitment to homeless prevention across Herefordshire Council and Health Services, and develop and agree actions for implementation.
2. Identify funding and other opportunities to actively work in partnership with others to help homeless people develop their skills and access the support, education, employment and training needed to achieve their aspirations and promote successful tenancy sustainment.
3. In partnership with voluntary and community groups and homeless people or those at risk of homelessness, explore the feasibility of developing a social enterprise to increase employment opportunities for homeless people
4. Continue to seek and maximise new funding opportunities for prevention initiatives, including supporting funding submissions by the voluntary sector and community groups to resource support and outreach work with socially excluded households at risk of homelessness
5. Work with private landlords to put in place packages of support and financial assistance that provide incentives for landlords to offer tenancies to people who are homeless or threatened with homelessness.
6. Investigate how the reasons why private sector landlords terminate Assured Shorthold tenancies can be more effectively captured as a basis for addressing homelessness from this tenure and identifying potential opportunities for prevention.
7. Work with the council's Children's Wellbeing Directorate and social housing providers to identify how the housing and support needs of homeless, and potentially homeless, 16-17 years old and young people leaving care can be most effectively met. Develop and agree

⁴³ Hard Edges: Severe and Multiple Disadvantage in England, Bramley, Fitzpatrick et al, January 2015

protocols for implementation. Develop new local models, which are appropriate and sharing of the management of risk.

8. Continue to work with vulnerable families under Herefordshire's 'Families First Programme' to prevent homelessness and deliver lasting positive change. Identified outcomes are to:
 - i. Improve children's school attendance and behaviour.
 - ii. Reduce both adult and youth crime and anti-social behaviour.
 - iii. Assist adults into employment or training.
9. Continue to work with West Mercia Women's Aid in their support for women who are homeless or at risk of homelessness due to domestic violence and abuse.

The following case study is illustrative of findings from a number of research projects including 'Rebuilding Shattered Lives, St Mungo's March 2014, which suggest that women's life experiences of violence and abuse can be a significant risk factor in the development of subsequent mental health problems.

It is suggested that these experiences can leave some women with very complex needs, including a combination of offending behaviours, alcohol and/or drug issues, homelessness, and for many, continued experiences of violence, abuse and exploitation.

Mental health consequences such as depression, anxiety, post-traumatic stress disorder, self-harm issues, and low self-esteem can be exacerbated by the lack of sustained access to appropriate services. Suicide attempts are much higher amongst women who have been abused compared to those who have not.

Case Study:

B was admitted to hospital after overdosing on drugs and alcohol. She had been in abusive relationships, had a history of mental ill health and, often, a very chaotic lifestyle. Her stay in hospital was challenging and resource intensive and there was a very real possibility that she would be homeless on discharge.

Prior to coming to Herefordshire B had been accommodated in a women's refuge in another part of the country. It was planned that she should return and travel arrangements were made. Unfortunately, before this could happen B was arrested, following an incident, and held at a police station. This changed the situation and considerable negotiation and discussion with all involved parties was necessary before it was agreed that could return to the refuge, where she would receive the support she needed to access and maintain and appropriate housing.

This is the sort of approach recommended in 'Making Every Contact Count,' DCLG, August 2012 which states that:

'For many people, becoming homeless is not the beginning of their problems; it comes at the end of a long line of crises, a long line of interaction with public and voluntary sector services, a long line of missed opportunities. We must change that.'

6.3 OBJECTIVE 3:

IMPROVE THE HEALTH AND WELLBEING OF HOMELESS PEOPLE AND THOSE WHO ARE AT RISK OF HOMELESSNESS

People who become homeless have some of the highest and costliest health needs in a local community, but those needs are often overlooked when healthcare and social care services are planned and commissioned.⁴⁴

ACTIONS:

1. Investigate the feasibility of carrying out the Homeless Link Health Needs Audit with voluntary and statutory agency partners. The Audit has been updated with funding from Public Health England. This is a big project and will require the commitment of all partner agencies if successful implementation and robust results analysis is to be achieved.
2. Investigate the feasibility of developing a Groundswell Homeless Health Peer Advocacy Project, which will support homeless people to access health care and be delivered by volunteers with personal experience of homelessness.
3. Demonstrate a commitment to improve the health of homeless people by working towards achieving the priorities in the St Mungo Broadway Charter for Homelessness Health through:
 - i. Identifying and including the health needs of homeless people in the Joint Strategic Needs Assessment, including people who are sleeping rough and those living in temporary supported accommodation.
 - ii. Providing leadership on tackling health inequalities through a stated public health commitment and the recognition of homelessness as a priority for the Herefordshire Health and Wellbeing Board.
 - iii. Commission for inclusion by working with the CCG to ensure that local health services meet the needs of people who are homeless and that services are welcoming and accessible.

⁴⁴ 'Homeless Health Needs Audit,' Homelessness Link, August 2015

Research has shown that street homeless people and those at risk often seek medical help at a later stage during illness, leading to costly secondary health care and reduced positive health outcomes. This can be intensified by reduced opportunity for recovery if homeless people return to inappropriate, insecure accommodation after medical treatment.

As the Case Study below illustrates, in some cases, accommodation may be lost during hospitalisation, resulting in further costs to health services where a patient has no suitable accommodation to return to upon hospital discharge. In addition, people can recover more quickly if they have appropriate accommodation to go to and they are less likely to be readmitted to hospital as emergency patients.

Research quoted in Homeless Link's, 'Evaluation of the Homeless Hospital Discharge Fund, January 2015, showed that the total cost of hospital usage by homeless people has been estimated to be about four times higher than the general population. If inpatient only costs are considered, the difference is eight times higher among homeless people.

Case Study:

L had been admitted to hospital due to self-neglect. She was dehydrated, insulin dependent and was also exhibiting acute symptoms of anxiety and depression. L had been living in insecure accommodation in the home of an acquaintance and due to changed circumstances was unable to return. The risks to L's health and her fragile emotional wellbeing meant that she could not be discharged from hospital without a suitable home to go to.

As a priority, the Hospital Discharge Worker worked closely with L and other agencies to put all the necessary processes in place and L was able to bid for and acquire a housing association property which was suitable to her needs. Reports suggest that L's health is improving and she is happy in her new home.

6.4 OBJECTIVE 4:

ENSURE THAT AFFORDABLE HOUSING AND SUPPORT SERVICES ARE AVAILABLE FOR HOMELESS PEOPLE AND THOSE AT RISK OF HOMELESSNESS

***'As the [universal benefit] cap is initially being implemented by "squeezing" Housing Benefit entitlement, housing organisations in both the social and private rented sectors expressed concern about its potential impact on rent arrears, evictions and increases in homelessness amongst those affected.'*⁴⁵**

⁴⁵ House of Commons Briefing Paper, The Benefit Cap, July 2015

The shortage of low cost housing is a major barrier to tackling homelessness effectively.

Given the pressures on Herefordshire's housing market, and a central government emphasis on low-cost home ownership, it is absolutely necessary to make best use of the existing affordable social rented housing stock. In addition, the council will need to explore appropriate alternatives in the private rented sector, as well as enabling the provision of new affordable accommodation options for those that are unable to access market housing.

ACTIONS:

1. Respond to the current pressures in the housing market by working with housing providers to make the best use of existing stock and focusing on the provision of new affordable accommodation for those that are unable to access market housing.
2. The delivery of new housing will be supported through the following:

i. Delivering New Homes Policy SS2

- A supply of deliverable and developable land will be identified to secure the delivery of a minimum of 16,500 homes in Herefordshire between 2011 and 2031 to meet market and affordable housing need.
- Hereford will be the focus for new housing development to support its role as the main centre in the county. Outside Hereford, the main focus for new housing development will take place in the market towns of Bromyard, Kington, Ledbury, Leominster and Ross on Wye.

ii. Affordable Housing Policy H1 – thresholds and targets

All new open market housing proposals on sites of more than 10 dwellings, which have a maximum combined gross floor space of more than 1000 sqm will be expected to contribute towards meeting affordable housing needs.

- Indicative affordable housing targets of 35% and 40% have been established for different parts of the county, based on evidence of need and viability in the county's housing market and housing value areas.
- Affordable housing provided under the terms of this policy will be expected to be available in perpetuity for those in local housing need.

iii. Rural Exception Sites Policy H2

- The provision of affordable housing is more difficult in rural areas where often the scale and location of new development is more restricted. Proposals for affordable housing schemes in rural areas may be permitted on land, which would not normally be released for housing in accordance with the criteria set down in the policy.

- The policy enables the provision of affordable housing outside of villages, in areas where there is generally a restraint on open market housing, so as to help meet affordable housing needs in rural areas in perpetuity.
 - In order to enable the delivery of affordable housing some market housing may be permitted, as part of the development, to subsidise a significant proportion of affordable housing provision. This will need to be evidenced through a financial appraisal as set down in the policy.
3. Explore options for increasing housing choice for homeless people through access to good quality, affordable private rented sector housing, where this is appropriate to the needs of the household and, where applicable, the duties set down in the Localism Act 2011 and the Homelessness (Suitability of Accommodation) (England) Order 2012 are clearly met.
 4. Identify opportunities to pilot an additional shared accommodation model for young single people.
 5. Identify opportunities for increasing access, for people under the age of 35 years, to social and affordable private rented accommodation in the light of the implementation of the Welfare Reform and Work Bill 2015.
 6. Review the availability and use of good quality, affordable temporary accommodation for homeless households.
 7. Work with social care colleagues and other stakeholders to continue to develop the evidence base for the housing and support needs of vulnerable people, including young people, learning disabled people, people with mental health problems and those with substance dependencies. Work with housing and support providers to enable these needs to be suitably met.
 8. Continue to help prevent homelessness through the pro-active use of the Homelessness Prevention Fund to enable access to housing and/or prevent the loss of the existing home.
 9. Enable local housing associations to make the best use of their existing stock through provisions in the reviewed Home Point Allocations Policy

Case Study

J was living in a housing association property with his adult son D, who has a life-long development disability. J had failed to recover from an earlier physical and emotional trauma and the condition of his property continued to deteriorate to a, potentially, unsafe condition. Despite the best efforts of the housing association J did not engage and, as a last resort, the housing association was taking action to regain possession of the property and the family were at risk of homelessness.

G, a member of the Housing Solutions Team, who had previously worked with J, managed to convince him of the seriousness of the situation and he eventually agreed to co-operate. As a consequence, the housing association were prepared to withdraw legal action. G worked intensively with the family, the property was brought back up to standard, defective goods and furniture was replaced and both J and D were allocated a support worker.

Without this successful intervention the financial costs to other services would have been considerable. D is incapable of independent living and would have required accommodation to be provided by social care. J had a serious medical condition and was awaiting a further operation. He would not have been able to be discharge from hospital without a safe, suitable home to go to.

7. FUNDING CONTEXT

The Homelessness Prevention Strategy has been written within the context of substantial reductions in the council's budget for the lifetime of the Strategy.

Since 2011, the council has saved £49 million. From now until 2020, the council will need to save an estimated additional £42 million.

The impact of this is that the council can no longer continue to pay for all the services that it has traditionally provided and faces challenging decisions about prioritising service areas and how they are provided.

8. NEXT STEPS

We will, where necessary, develop an Action Plan in consultation with partner agencies, setting out the work necessary for achieving the strategic objectives and the dates by which we intend to achieve them.

The objectives will need to be delivered within existing resources and driven forward by members of the Commissioning Team and the Housing Solutions Team. Input will also be necessary from colleagues across other parts of the council and its partner agencies. The council

will also work with other strategic groups and partnerships, where they have a role to play in addressing key objectives in the strategy.

Successful delivery will ultimately depend on effective co-ordinated action and commitment both within the council and across our statutory and voluntary sector partner agencies.

9. MONITORING

The Homelessness Forum will monitor achievement of key objectives as set out in the Strategy Action Plan.

The resources available to deliver the Action Plan will be reviewed on a regular basis and every opportunity will be taken to acquire additional finance through external funding opportunities.

Finally it should be recognised that unforeseen challenges may continue to present through the roll-out of welfare reform and radical changes to central government housing and planning policy and that this may require a re-evaluation of approach.

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**Housing Allocation
Policy for
Herefordshire
2016**

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GLOSSARY

Accommodation of choice	Accommodation of choice is defined through legislation and case law in relation to homelessness decisions. It relates to establishing a local connection. If someone is living in accommodation not of their own choice then residence by virtue of simply living in an area will not count towards having a local connection. For further definitions of affordable housing please visit: http://www.herefordshire.gov.uk/housing/36077.asp
Advertising cycle	The period from Wednesday morning to midnight on a Tuesday when properties are advertised and applicants can bid for them.
Affordable Housing	Housing provided at below market prices and allocated on the basis of need to people who qualify for the housing register in Herefordshire as their only home and who are unable to purchase or rent properties generally available on the open market without financial assistance.
Affordable rented housing	Rented housing usually owned and managed by housing associations where the total rent charged (including service charges, where applicable) is no more than 80% of the open market rent.
Allocation policy	This is the policy document which explains the rules that Herefordshire Council and its partner landlords use to define those who qualify to register for social and affordable rented housing, to prioritise those applications.
Armed Forces	As detailed in s.374 Armed Forces Act 2006, this means the Royal Navy, the Royal Marines, the regular Army or the Royal Air Force.
Bedroom Standard	The bedroom standard is the commonly used standard to assess whether a household is overcrowded. The standard allocates a separate bedroom to each: Adult couple A person over 21 2 people aged 10-20 of the same sex 1 child under 10 years and 1 young person under 20 of the same sex 1 or 2 children under 10 years (any or both sexes) Any unpaired person aged 10-20 or unpaired child under 10
Bidding for a property	This is the method by which applicants show they have an interest in the property being advertised by Home Point.
Bidding platforms	These are the methods available for qualified applicants to express an interest in an available property.
Choice based lettings	A scheme that enables applicants to express an interest in a property of their choice, within the property types for which they qualify.
Eligibility	Nationally set requirements that applicants have to comply with as the first stage in the registration process.
Equality Act 2010	This act requires that 'due regard' is shown to the needs and rights of members of the community including the 'protected' characteristics, which are: Age Disability Gender Gender reassignment Marriage and civil partnerships

	<p>Pregnancy and maternity</p> <p>Race</p> <p>Religion or belief</p> <p>Sexual orientation</p>
Home Point	The name of the choice based lettings partnership in Herefordshire.
Homelessness Act 2002	Made amendments to the Housing Act 1996 and places a duty on local authorities to review homelessness in their area.
Housing Act 2004	Parts 1 and 2 introduced the Housing Health and Safety Rating System to improve standards in accommodation. The Bedroom standard (see above) was introduced as part of this system.
Housing Association	A not-for-profit landlord organisation providing a range of affordable housing. Also known as Registered Social Landlord (RSL) and, more recently, Registered Provider (RP) in the relevant legislation. They are generally regulated by the Homes and Communities Agency.
Housing Health and Safety Rating Standard (HHSRS)	The housing health and safety rating system (HHSRS) is a risk-based evaluation tool used to identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. It includes a definition of bedroom requirements for households known as the 'bedroom standard'.
Housing Register	The Housing Register is the directory of applicants who have expressed an interest in, and qualified for, social housing in Herefordshire.
Local connection criteria	These criteria relate firstly to the county and the level of preference an applicant has for housing in the county in the Allocation policy. Local connection criteria may also refer to the terms of a s.106 planning agreement which gives priority to applicants with a defined connection to the specific parish.
Local lettings policy	Local lettings policies are agreed for the allocation and letting of properties in specific area to address particular issues in that area.
Localism Act 2011	The Localism Act 2011 gave flexibilities to local authorities in relation to qualification on the housing register.
Looked after children	A child who is being looked after the local authority is known as a child in care. They might be living: with foster parents. at home with their parents under the supervision of social services. in residential children's homes.
Low cost home ownership	Housing sold at a price lower than the open market value to households in housing need who could not otherwise afford to purchase, as determined by the Technical Data supporting the Planning Obligations SPD and updated annually.
Mutual exchange	A swap of homes by two social housing tenants moving permanently into the other tenants property. Tenants must be granted permission by both landlords.
Nomination	The term used for applicants who qualify for the register and whose name and details are provided to the landlord as part of the bidding process through Home Point.
Reasonable Preference	The Housing Act 1996(as amended) requires local authorities to give reasonable preference in their allocation policies to applicants who fall into specified categories of housing need. See section 2.1 of this policy for a full explanation of the categories.
Reduced Preference	The term used for applicants whose application has a lower priority than it would normally have if the applicant had either a local connection to Herefordshire or had not previously acted in a manner that was not acceptable for a tenant living in social housing.
Registered Provider	Registered provider is the current term for organisations that are registered with the Homes and Communities Agency to provide affordable housing.

Reserved Forces	AS detailed in s374 Armed Forces Act 2006, this means the Royal Fleet Reserve, the Royal Naval Reserve, the Royal Marines Reserve, the Army Reserve, the Territorial Army , the Royal Air Force Reserve or the Royal Auxiliary Air Force.
Restrictive advertising	This is a term used for adverts which indicate that available properties are restricted to specific categories of applicants.
Section 21 notice	A formal document giving tenants two months notice on an assured shorthold tenancy.
Section 106	This refers to s.106 Town and Country Planning Act 1990 under which developers may provide affordable housing on a specific site, with criteria which grant priority to applicants with a local connection to the parish or ward. .
Settled accommodation	Defined through legislation and case law in relation to homelessness decisions. Any accommodation that is precarious, short term or insecure is not considered settled. Examples of settled accommodation include, but are not limited to: <ul style="list-style-type: none"> · Freehold or Leasehold Ownership · A tenancy enjoying security of tenure (assured or assured shorthold tenancy) · An indefinite Licence or Permission to Occupy (Any occupation implying an indefinite time period) · Returning to long term occupation with parents · An indefinite stay with other relatives · Tied accommodation as a long term employee.
Shortlist	A list of applicants who have expressed an interest in a property advertised by Home Point at the close of the bidding cycle.
'Skipping' bids	This is the term used where a housing association landlord does not offer a property to the applicant next on the shortlist for reasons such as ineligibility for the property type, does not meet the housing association's Allocation policy requirements or has outstanding housing or housing related debt.
Social Housing	The term used in this policy document to mean social and affordable rented housing let through this Allocation policy.
Social Rented	Rented housing usually owned or managed by a housing association, let at below market rents, where the changes in rent levels are subject to government policy.
Specialist housing	Housing that has been specifically designed to meet the needs of people with particular needs. It can refer to housing that has been purpose designed or designated for a particular client group to assist tenants to live independently.
Statutory duty to homeless household	A term that refers to people or families to whom a local housing authority have a duty to make an offer of housing
Supported housing	Housing scheme where housing, support and sometimes care services are provided as an integrated package. The schemes can be long-term designed for people who need support to live independently, or short-term, designed to help people acquire the skills needed to move on into more mainstream housing.
Transfer	This is a term used for a permanent move by an existing social housing tenant within social housing stock.

INTRODUCTION

The Housing Act 1996 requires every local authority to develop and publish an allocations policy for determining the priorities and detailing the procedures to be followed in allocating housing. Recent legislation has allowed local authorities more freedom to determine policies that best meet local circumstances and priorities, within the constraints set out in the Housing Act 1996, as amended (“the 1996 Act”).

Herefordshire Council does not own any housing stock. Its statutory duties are delivered through arrangements with both stock transfer organisations and other housing associations operating in the county. This policy clarifies the roles and responsibilities of the local authority and the housing associations, and the legal responsibilities of each for delivering the local authority’s statutory responsibilities in relation to the allocation of housing. It details the arrangements for applying to register for, and the process by which the majority of, social and affordable rented housing (hereafter referred to as ‘social housing’) is let in Herefordshire.

The council and the major registered providers (hereafter referred to as partner housing associations) within the county operate a common housing register and allocate housing through a choice based lettings scheme known as Home Point. Although Home Point administers the system, specific allocation decisions are made by the housing association which owns or manages the individual property.

Details of the partner housing associations are available in Appendix A.

Partner housing associations use this policy as a means of allocating 75% of their available social housing within the county.

The remaining 25% of properties are let to existing tenants registered under band E in this scheme, to which the associations apply their own rehousing criteria.

The 1996 Housing Act (as amended) requires local authorities to make all nominations in accordance with their allocation policy. This policy will be used to make nominations to any housing association with stock in the county that is not a partner in Home Point.

In developing this policy Herefordshire Council has had due regard for legislation, government guidance and responses from consultation.

This policy sets out:

- The aims of the policy;
- Who can register;
- How applicant’s housing needs are assessed;
- How the housing register operates;
- How social rented homes across the county are let.

The key aims of this policy are to:

- meet the legal requirements for the allocation of social housing
- provide housing choice of affordable homes to meet applicants needs
- ensure that the housing allocation process is transparent to applicants
- maximise the best use of existing housing stock within the county
- help to prevent homelessness and minimise the use of temporary accommodation
- contribute to the development of sustainable communities
- let housing association's accommodation fairly and in an open and transparent way
- ensure consistency in the way in which applicants access affordable and social rented housing

We will deliver these aims by:

- Operating a housing allocation policy where applicants are placed in bands according to their level of need;
- Advertising all available homes weekly;
- Providing support and advice for vulnerable customers when they need it;
- Providing applicants with straightforward and realistic information on supply and demand and the prospect of re-housing;
- Ensuring that every application is dealt with fairly and consistently, so promoting equality of opportunity;
- Building confidence in the choice based lettings process;
- Facilitating mobility to meet household needs.

1. Legal framework

The primary legislation governing the allocation of social housing is the Housing Act 1996, (as amended), and the associated statutory codes of guidance and statutory instruments.

This legislative framework applies to Herefordshire Council directly although it requires housing associations to cooperate in offering accommodation to assist the council to discharge its statutory duties to homeless people and to meet its strategic housing functions and sustainable communities.

Where an allocation by a housing association follows the policy it will meet the requirements of the nomination agreement to let 75% of properties to applicants from the council's housing register.

Any housing association with stock in Herefordshire who is not a partner of Home Point will be subject to local nomination agreements in order to allocate accommodation. Nominations to these vacancies will be assessed in accordance with this policy.

The legislative framework restricts eligibility for social housing and enables local authorities to define those who qualify to be allocated housing in their areas. It allows financial resources, behaviour and local connection to be taken into account when defining qualification regulations. Herefordshire Council has chosen to make use of these flexibilities in this Allocation policy.

The Allocation policy has been developed to be compatible with other relevant legislation and guidance including, but not restricted to:

- The Human Rights Act 1998
- The Data Protection Act 1998
- The Freedom of Information Act 2000
- Children's (Leaving Care) Act 2000
- The Equality Act 2010
- The Right to Move Guidance 2015

A summary of the Allocation policy must be published and made available free of charge to any person who asks for a copy. This document is the full version of the scheme and is available for inspection on the Home Point, Herefordshire Council, and any of the partner's, websites. If requested a hard copy can be provided on payment of a reasonable fee (to be confirmed at time of request).

1.1 Legal Responsibility

The Council will be responsible for the conduct and costs of any legal challenge relating to the Council's housing Allocation policy and general operation of the Home Point system.

A partner housing association will be responsible for the conduct and costs of any legal challenge relating to the individual partner housing association. This includes where an applicant has been refused a property because they do not meet the housing association's Allocation policy criteria, were subject to the housing association's exclusion policy or cannot provide rent in advance or payment by direct debit, if required.

2. Equality statement

This policy recognises and respects different and diverse housing needs.

The Allocation policy is drafted and framed to ensure that it is compatible with the council's equality duties including the duty to eliminate unlawful discrimination and to promote good relations between persons who share a relevant protected characteristic and those who do not. The protected characteristics are age, race, disability, sex, pregnancy and maternity, sexual orientation, religion or belief and gender reassignment.

The policy ensures that each applicant is assessed on the basis of individual need. In addition, the assessment will seek to identify and meet any special requirements.

Herefordshire Council expects all partners to ensure that they comply with the Equality Act 2010 and have their own Equality policies available.

3. Statement on choice and constraint

The Home Point partners are fully committed to enabling applicants to play an active role in choosing where and in what property type and tenure they want to live, whilst continuing to house those people in the greatest need, making the best use of the available housing stock and complying with all relevant legislation.

It is important to appreciate that the demand for accommodation is higher for some types of property and for some areas than others. In making a decision about the choices available, applicants need to consider their housing need priority against the availability of properties in any given area.

Applicants can determine whether they are likely to be successful as they are able to check their position on a shortlist at the time of placing a bid and when all bids have been made after the shortlist is closed. They are also able to check on historic bids. This enables an applicant to make an informed choice when deciding which property to apply for and whether social housing is a realistic option to secure housing.

Whilst the policy offers applicants choice, there will be a number of instances where this may not be possible, for example:

- the applicant does not meet the criteria for the scheme or the empty property (see page 28)
- there is a legal agreement restricting who can be offered the property (see page 29)
- there is a local lettings plan in place (see page 29)
- the applicant has been accepted under the full homeless duty (see section 6 page 30)

4. Officer roles and responsibilities

The Home Point team administers the housing register and the choice based lettings scheme on behalf of the council and the partner housing associations. Herefordshire Council is responsible for the operational management of the scheme.

Whilst the council and its partners aim to achieve clarity and transparency for the public, there will be discretion in relation to qualification, priority and property size rules for council officers to provide a degree of flexibility in the implementation of the policy when considering individual exceptional cases. Any use of this flexibility will be undertaken in agreement with the Head of Prevention and Support.

Certain functions within the scheme can only be undertaken by a senior officer or manager and, where this is the case, it has been identified in the allocations policy.

Applicants should note that the decision to make an offer of a property is made by the housing association, not the Home Point team.

5. Confidentiality, data protection & information sharing

All information received relating to a household's application for inclusion on the housing register will be treated as confidential in accordance with the Data Protection Act 1998.

Home Point will seek the consent of applicants joining the register to share personal information about the applicant and members of their household. Any information relating to the application, and the application itself, can only be viewed by staff members of the Home Point partners.

Information will not be shared with third parties unless consent has been given by the applicant. However, consent is not required in exceptional circumstances which include where there is a public safety interest or to prevent fraud.

The existence of an application from an individual will not be disclosed to any other member of the public without the consent of the applicant.

An applicant has the right to request details of the information held about them.

6. Advice and assistance

The council acknowledges that this Allocation policy requires the active participation of housing applicants and to reflect this, the council and its partners aim to provide advice and assistance as required by s.166(1) and s.168(1) of the Housing Act 1996. This will ensure that no person is disadvantaged by the way the policy operates.

General information about the scheme will be made available as follows:

- information about the procedures for applying to the scheme and for applying for advertised properties

- information about how applicants are prioritised under this policy
- how successful applicants will be selected
- rules on how properties will be advertised including bidding cycles and restrictive labelling
- information about the housing associations that have vacancies advertised through the Choice Based Lettings system

Applicants will also be provided with information regarding their own application which will include:

- what information they need to supply to complete registration and the **timescales** for providing the information
- if they do not qualify what they need to do to rectify this
- what their band is under this policy
- what size properties they are entitled to bid for

Applicants who have difficulty reading or understanding this policy may benefit from the following services:

- an interpretation service if their first language is not English
- signing if speech or hearing is impaired
- provision of documents in large print if an applicant is visually impaired
- an interview to explain the policy
- information about where independent advice is available

The council's Housing Solutions team can also provide information about other housing options. This will include:

- advice on housing associations operating in the county
- advice and help on renting in the private sector
- advice on available low cost home ownership options
- advice on how welfare benefits, employment, education and training may improve their housing options

Advice is also available through the the Housing Advice Questionnaire, a self-help tool available on the Home Point website www.home-point.info

7. Councillors, board members, employees and their close relatives

This Scheme is designed to ensure that Herefordshire Council and partner housing associations are transparent and equitable when letting homes to staff, Councillors or board members and their close relatives. Applicants must disclose any such relationship when applying for housing. Failure to do so may result in the application being suspended or closed.

The Allocation scheme is open to any qualifying applicant and there are stringent checks in place that all applicants must follow. Staff, Council members and their relatives are treated as any other applicant and must be seen to not be gaining any advantage or any preferential treatment in the course of their application, nor shall they be disadvantaged.

8. What is an allocation under this policy?

In this policy an 'allocation' occurs when an applicant within bands P to D (see pages 22-24) are nominated to be an Assured or an Assured Shorthold tenant of a property owned or managed by a housing association. It does not include the selection of an existing tenant of a social landlord where that tenant does not have a housing need as identified in the banding scheme priorities P to D.

8.1 Exempt Allocations

The following are not 'allocations' under this Scheme and not subject to the banding scheme above:

- Succeeding to a tenancy under s.89 of the Housing Act 1985;
- A mutual exchange with another tenant;
- Assigning a tenancy;
- Transferring a tenancy in accordance with a court order under Family Law provisions or under the Civil Partnership Act 2004;
- An introductory tenant becoming a secure tenant;
- Provision of temporary accommodation in discharge of any homelessness duty or power;
- Applicants for supported and adapted housing who are subject to alternative assessment procedures.

WHO CAN REGISTER

1. ELIGIBILITY

Herefordshire Council, through the Home Point partnership, operates a single housing register on behalf of the partnership. This means that applicants need to complete only one application to join the scheme and bid for properties made available by the housing providers participating in the scheme.

Social housing will only be allocated to those households who are eligible and qualify to register. The Housing Act 1996, as amended, defines the categories of people who are **not** eligible.

1.1 Ineligible households

- Applicants subject to immigration control as defined by Section 13(2) of the Asylum and Immigration Act 1996 and prescribed by the Secretary of State as ineligible;
- Applicants who are not habitually resident in the Common Travel Area (i.e. the United Kingdom of Great Britain and Northern Ireland, the Republic of Ireland, The Channel Islands and the Isle of Man);
- Applicants whose right to reside in the UK is from a status as a 'jobseeker' within the meaning of Regulation 6(1)(a) of the Immigration (European Economic Area) Regulations 2006 (SI 2006/1003) ("the EEA Regulations");
- Applicants whose right to reside in the Common Travel Area is an initial right to reside for a period not exceeding 3 months under Regulation 13 of the EEA Regulations.

2. QUALIFICATION

All applicants eligible to join the register will be considered, provided that the application is made in accordance with this policy. Applicants must have a housing need recognised by the Allocation policy in order to qualify for inclusion on the register.

2.1 Local connection

To qualify to join the Home Point housing register applicants should have a local connection to the county, as defined by s.199 of the Housing Act 1996. Applicants with a local connection to the county will be awarded greater preference than those who do not have a verified local connection. Applications received from those without a local connection who do not fall into one of the 'reasonable preference' categories (see page 20-21) will not be accepted on to the housing register.

Local connection in this context means that the applicant meets at least **one** of the following criteria:

- a) Currently living in the county (in settled accommodation or accommodation of choice) for at least 6 months out of the last 12 months or 3 years out of 5 years at the point of application;
- b) Have close relatives living in the county (parents, adult children, brothers or sisters) who have done so for at least the last 5 years at the point of application;
- c) Be employed and have worked in the county for at least 6 months or more and the work is for more than 16 hours a week.

For the purposes of determining eligibility on residency grounds, living in the local authority area will not include the following:

- Occupation of a mobile home, caravan or motor caravan where it is not their only or principal home;
- Occupation of a holiday letting for the purposes of a holiday;
- In-patient of a hospital or similar settings where the applicant has a connection elsewhere.

Under some special circumstances, such as where there may be an overriding housing need to be met or a duty to a statutory homeless person, then the qualification rules may be waived.

2.2 Armed Forces personnel

Local connection requirements will not apply to the following applicants:

- members of the Armed Forces and former Service personnel, where the application is made within five years of discharge;
- bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner;
- serving or former members of the Reserve Forces who need to move because of serious injury, medical condition or disability sustained as a result of their service.

ADDITIONAL PREFERENCE FOR ARMED FORCE PERSONNEL

Applicants who meet the above Armed Forces criteria **AND** fall into any of the reasonable preference categories (see banding scheme section, page 20) will be awarded additional preference by means of backdating the effective date by six calendar months. For example, a qualifying applicant awarded priority within one of the reasonable preference categories on 1st December 2015 will have their effective date backdated to 1st June 2015.

2.3 Those who do not qualify

An applicant will not be accepted on to the register for social housing if: -

- a) They have sufficient financial resources to resolve their own housing need. Applicants with a combined annual household income of £45,000 or above and those with capital or assets of £50K (under 50 years of age) or £100K (over 50) will not normally qualify to join the housing register. Applicants over 60 years of age with capital or assets worth up to £150K may be accepted on to the register for sheltered housing only where they have a **proven** need for sheltered housing.
- b) They have unreasonably disposed of financial resources that could have enabled them to purchase/obtain their own accommodation.

- c) Applicants (or a member of their household) have been in breach of the conditions of their tenancy such that a social housing landlord would be entitled to outright possession and at the time of their application for housing they are still considered unsuitable to be a tenant by reason of that behaviour. For more details see Appendix B.
- d) Applicants have **significant rent or former tenant arrears** such that, if the applicant(s) was the tenant of a housing association, a social housing landlord would be entitled to outright possession. For more details see Appendix B.

2.4 Right to review

Applicants have the right to request a review of the decision made in the registration and allocation process. These include applicants who;

- are not eligible to join the register;
- are not a qualifying applicant due to unacceptable behaviour or housing debt;
- application has been cancelled;
- priority banding has been withdrawn;
- who wish to query the information being taken into account in considering whether to make an offer of accommodation.

The review in the first instance will be carried out by the partner organisation that made the decision. The person carrying out the review will be senior to the person who made the original decision and will have had no previous involvement in the original decision. For further details see Appendix C.

2.5 Young person aged 16- 18 years old

The register is open to applicants under the age of 18 unless they are specifically ineligible or do not meet the qualification requirements.

It should be noted, however, that a tenancy would not usually be granted to applicants under the age of 18. Consideration may be given to applicants where an adult or organisation acts as a trustee to hold the tenancy in trust for the applicant until they reach the age of 18. There may also be a requirement to obtain a rent guarantee.

Applicants aged 16 or 17 years old will be assessed for accommodation where one or more of the following apply:

- over the age of 16 where a referral for assistance has been made by Social Services authorities under Section 27 of the Children Act 1989;
- a young person who is deemed a relevant or eligible child under the Children (Leaving Care) Act 2000 as amended.

In each case, an assessment of the applicant's housing, care and support needs will be undertaken to ensure that adequate support is available to make sure that the applicant is capable of maintaining a tenancy.

ASSESSMENT OF HOUSING NEED

1. Property Size

The table overleaf shows the size of properties that applicants are eligible for based on their household composition.

Households claiming benefits should be aware that there is a limit on their eligibility for housing benefit payments based on the government's assessment of their household's bedroom need. For further details see Appendix D.

Single people under the age of 35 claiming benefits are normally only entitled to the 'shared room' rate. For further details see Appendix D.

Single people between the ages of 18 and 21 are not entitled automatically to any help with their rent payments if they are not working. For further details see Appendix D.

The government is changing the way that benefits are paid. Universal Credit is the name for the monthly combined payment that will eventually be paid to all working age residents who are on a low income or out of work. Universal Credit is made up of different amounts, called 'elements' depending on individual circumstances. The housing element of the Universal Credit payment helps tenants with their eligible rent and service charge costs. Further information is available on the website www.gov.uk and in Appendix D.

In circumstances where an applicant is offered a property that is deemed larger than necessary by the housing benefit regulations, the housing association will undertake a financial assessment with the applicant to ensure that the rent is affordable to the household.

A number of flats and bungalows are restricted to people over a specified age or on the basis of need /support to help them maintain their independence. It is sometimes possible in these schemes to offer a larger property than shown below, subject to an applicant being able to afford the rent.

Applicants for sheltered accommodation will be assessed as to whether they need this type of accommodation.

Pregnant applicants without other children will be eligible primarily for 2 bed 3 person accommodation to enable larger households requiring 2 bedrooms to be housed in the larger 2 bedroom properties.

PROPERTY SIZE ELIGIBILITY								
Household size	Suitable property size							
	Bedsit/ studio	1 Bed	2 Bed 3 Person	2 Bed 4 Person	3 Bed	4 Bed 6 Person	4 Bed	5 Bed
Single person	X	X						
Single person or couple without children		X						
Single person or couple without children (age restricted properties)	X	X	X	X				
Pregnant applicant (25 weeks onwards)			X	X				
2 adult siblings sharing			X	X				
Parent(s) and one child			X	X				
Parent(s) and 2 children regardless of gender aged 0- 8				X				
Parent(s) and 2 children same gender aged 0 -15, less than 10 years age difference				X				
Parent(s) with 2 children aged 0-15 with greater than 10 years age difference				X	X			
Parent(s) and 2 children different gender one over 8 years				X	X			
Parent(s) and 3 children any gender mix aged 0-15					X			

Parent(s) and 3 children, one child over 15, other children of different gender and one of other children over 8.					X	X		
Parent(s) and 4 children					X	X	X	
Parent(s) with 5+ children						X	X	X

1.1 Extra room allowed for non-resident carers

Applicants with a disability or a long term health condition who have a non-resident carer may be entitled to an extra bedroom if they can provide evidence that:

- they reasonably require overnight care and that this care is provided;
- one or more persons regularly stay overnight to provide care;
- there is a need for an extra bedroom that is used by a carer or carers for overnight stays as part of caring for the applicant or a household member.

A 'person who needs overnight care' is defined as someone who is:

- receiving Disability Living Allowance middle or higher rate care or who receives the Personal Independence payment (PIP) daily living component enhanced rate and/or the mobility enhanced rate or Attendance Allowance.

If not in receipt of Disability Living Allowance, PIP or Attendance Allowance evidence must be provided to show that overnight care is required e.g. letter of confirmation from a medical practitioner.

1.2 Children / access to children

For the purposes of this section of the policy a child is defined as someone who is either under the age of 18 or who is still dependant on the applicant e.g. due to continuing education.

Where parents who do not live together but have shared care of their children the children will be treated as living with the parent who provides their main home and receives child benefit in respect of the child(ren).

1.3 Fostering and adoption

Where a household has formal evidence that, subject to a suitable home becoming available, approval would be given to foster or adopt a child or children, they may be included in the

bedroom entitlement calculation. Verification of fostering and/or adoption arrangements may be carried out by the housing association before an offer is made.

1.4 Sharing siblings

The policy enables adult siblings to register for upper floor (1st floor and above) flats. Both parties must be eligible and qualify to go on the register.

2. Banding Scheme

The Home Point partnership operates a needs based banding scheme described below. The bands are arranged to reflect housing need with the highest band indicating the greatest need for housing. The table is organized in descending order of priority for bands P to D. For the allocation of social housing under this policy, applicants in band P have the highest priority and applicants in band D have the lowest priority.

The scheme consists of 8 bands, with one 'band' being reserved for existing social housing tenants who do not have a housing need within the allocation policy and are only able to bid for the properties advertised as 'withheld by landlord' or 'for existing tenants only' i.e. the 25% of void properties to be used for this purpose.

All eligible applicants are placed in bands in accordance with their housing needs assessment. Further information about each band is available in Appendix E. Applications are prioritised first by band, and secondly, within that band, by effective date.

Where applicants are placed in a band with a specific time limit this means that at the end of the period of the time limit the Home Point team will review the applicants' bidding history. For further information see paragraph 5.1.

2.1 Reasonable Preference

Herefordshire Council is required by law to determine the relative priority that housing applicants are awarded. This is particularly important when, as is the case in this county, the demand for affordable rented housing is generally greater than the availability of homes.

The law, as it applies to local housing authorities, requires that reasonable preference for housing must be given to those in the categories set out in the Housing Act 1996 (as amended).

Therefore, the allocation policy gives reasonable preference to the following categories of people (s.166A (3)) :

- (a) People who are homeless within the meaning of Part 7 of the 1996 Act;

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

This does not mean that households who fall into the reasonable preference categories are necessarily entitled to priority over all other applicants in all circumstances.

DRAFT

Herefordshire Allocation Policy Banding Criteria	
Criterion	Summary definition
Band P – Time limits apply	
Statutory or severe overcrowding (reasonable preference)	This is awarded where a household is three or more bed spaces deficient or where the household is statutorily overcrowded as defined by Part X of the Housing Act 1985 and has not deliberately worsened their housing situation. 26 week time limit followed by review process
Under-occupation by a social housing tenant (releasing 1 or more bedrooms)	Households presently under-occupying a rented home owned by a partner housing association that is situated in Herefordshire and the applicant wants to move to a property fewer bedrooms. 26 week time limit
Serious state of disrepair (reasonable preference)	Households will be placed in this band in the following circumstances: <ul style="list-style-type: none"> • Where the hazard(s) are so severe or numerous that residential use of the property is prohibited. 26 week time limit followed by review process
Homeless households who are owed a full housing duty (reasonable preference)	Households who are owed a full housing duty under s. 193(2) (in priority need and unintentionally homeless), or s. 195(2) (in priority need and threatened with unintentional homelessness) of the Housing Act 1996, or ss. 65(2) or 68(2) of the Housing Act 1985. 12 week time limit followed by review process
Band A – Time limit 12 months (followed by review process)	
Care Leaver (reasonable preference)	This includes care leavers and relevant children as defined by the Children Act 2000, as amended.
End of Agricultural or service tied tenancy (reasonable preference)	This may apply to: <ul style="list-style-type: none"> • households where an agricultural worker is being displaced to accommodate another agricultural worker and the farmer cannot provide suitable alternative accommodation; • households in council service or related tenancies which are coming to an end.
Homeless, unintentional, not in priority need (reasonable preference)	Households assessed by the council's Housing Solutions team as being unintentionally homeless but not in priority need.
Lacking or sharing facilities with non-family members (reasonable preference)	Households who do not have access to a bathroom, kitchen or inside WC or whose accommodation lacks hot or cold water supplies, electricity supply or provision of adequate sources of heating. Households sharing a kitchen, bathroom/WC with non-family members who are not on the application. Family members would

	include parents, step parents, children, step-children, siblings, step- siblings and grandparents.
Major adaptations no longer required	Tenants of partner housing associations who no longer require a property where major adaptations such as a stair lift or level access shower have been installed.
Move on from supported/specialised accommodation (reasonable preference)	Tenants of supported or sheltered housing who have been assessed by their support provider as being ready to move into settled accommodation.
Overcrowding by 1 or 2 bed spaces (reasonable preference)	Households where the property is one or two bed spaces deficient and the household has not deliberately worsened their housing situation.
Right to move for social housing tenants	This applies to a social housing tenant who works in the county or has the offer of work in the county in accordance with the Right to Move guidance 2015.
Referral from Herefordshire Council's Adult Wellbeing or Children's Wellbeing Directorates.	Households who require urgent alternative accommodation on safeguarding or associated grounds, subject to referral to, and agreement from, Head of Prevention and Support, Adult Wellbeing Directorate.
Verified harassment, witness intimidation	Households where the police or relevant support agencies advise that there is a need for alternative accommodation to protect witnesses or prevent severe harassment and where prosecution of the offender is intended.
Verified urgent medical/welfare need (reasonable preference)	Households where there is an urgent need to move to prevent or improve significantly health or well-being by the provision of a different type of accommodation. Medical evidence will be required and will be used to assess banding. This banding will not be awarded where the need is temporary as a result of injury or surgery.
Verified urgent need to move to a particular area to avoid hardship (reasonable preference)	Households who need to move due to employment, where the household has no access to a private vehicle AND the use of public transport is not available or the journey would take over 1.5 hours in each direction.
Band B – Time Limit 12 months (followed by review process)	
Affordability	30% or more of gross income spent on housing costs, excluding child benefit, attendance allowance (or successor benefits).
Households with children aged 8 or under living above first floor (reasonable preference)	This applies to households where there is one child (or more) is aged 8 or under. Households must live above the first floor i.e. there are 2 flights of stairs to reach the front door of the home.
Intentional homeless (reasonable preference)	As defined by the Housing Act 1996, as amended. Households who are assessed as being intentionally homeless may have a reduced preference depending on the reason for their status as intentionally homeless.
Verified medical/welfare need (reasonable preference)	Households where there is a need to prevent or improve the health or well-being by the provision of a different type of

	accommodation. Medical evidence will be required. This banding may be considered where surgery is required for the period up to the surgery and during any recuperation period. Once an applicant has recovered and their housing need is resolved the banding will be removed.
Verified need to move to avoid hardship (reasonable preference)	Households who need to move due to employment, where the household has no access to a private vehicle AND the use of public transport is not available or the journey would take over 1 hour in each direction.
Band C	
Proven need for sheltered housing with assets up to £150K	Households over the age of 60 who have been assessed as in need of sheltered accommodation but whose ability to access open market provision is limited due to total capital assets of under £150K.
Relationship breakdown	Applies where there are children involved and insufficient financial resources to resolve their own housing needs as two separate households
Rural localities /s.106 local connection schemes	In order to promote sustainable communities, households that do not have a housing need under other criteria in this allocation scheme but have a local connection to a specific parish may qualify for section 106 affordable housing developments in the parish(es) to which they have a local connection.
Sharing siblings	Adult siblings, living in the family home or not in settled accommodation, who apply as joint tenants for properties on the first floor and above.
Band D –reduced preference	
Applicants/households who:	Are within the reasonable preference categories but who do not have a local connection to the county of Herefordshire.
	Have deliberately worsened their housing circumstances.
	Have housing related debts to the local authority or a housing association.
	Have committed acts of anti-social behaviour or other breaches of tenancy not severe enough to have been subject to an outright possession order, a demotion order, an injunction, criminal proceedings.
	Have provided false information on their application for social housing.
Band E – transfer band	
	Existing social housing tenants who are not in the reasonable preference or under-occupation categories above
Band F – low cost home ownership	
	Households who are interested in applying for low cost home ownership schemes.

HOW THE HOUSING REGISTER WORKS

1. Registration process

The Housing Register (referred to as 'the Register' throughout this document) is a key part of the Choice Based Lettings (CBL) scheme. The Register is a single list of all the applicants who have applied for and been accepted (on to) the CBL scheme. People who apply to join the register have the benefit of applying to all the partner landlords through one application. In order to bid for a property, an applicant must be on the register.

All applicants must complete the application process. Applicants can apply to join the register by completing an on-line form. This can be done through by going to the Home Point website www.home-point.info. Information on how to complete the form is available on the Home Point website, as is the list of the evidence that needs to be supplied in support of the application. Also on the website is a Housing Advice Questionnaire which will give you personal advice on the housing options available to you.

1.1 Joint applications

Joint applications are encouraged and can be made so long as at least one applicant is eligible. However, if only one party is eligible, should an offer be made by a housing association, only the eligible applicant will be offered a tenancy.

Joint applicants can only make one application. In the case where two sole applicants wish to become joint applicants one of the applications must be withdrawn and the other amended to reflect the joint circumstances.

1.2 Multiple applications

Multiple applications are not allowed.

If an applicant is already registered the applicant must decide which application they want to retain. The other application will be closed. This will also apply to people who are registered as a joint applicant on more than one application.

1.3 Providing information and documentation

During the application process, applicants will be asked to provide supporting evidence to verify their identity and personal circumstances e.g. their National Insurance number and proof of residency for themselves and anyone being housed with them. A list of documents which can be used to support an application is available on the Home Point website.

Without supporting information the application will not be assessed and made active. An applicant is not able to bid for any property until s/he is active on the register. A failure to respond to a request for information as part of the initial verification process within 28 calendar days will generally lead to cancellation of the application

Additional information and documentation must be provided if requested. It is the responsibility of the applicant to provide the information / documentation within the specified timescale.

Once an application is completed, all applicants are assessed for any factors that determine housing need. If the applicant qualifies for housing, the application will be made 'active' on the Register and given the appropriate band.

1.4 Giving false information or deliberately withholding information

It is an offence under s. 171 of the Housing Act 1985 for applicants to:

- knowingly or recklessly give false information relating to their application for housing or other elements of the process e.g. change of circumstances;
- knowingly withhold information that has been reasonably requested.

A person guilty of an offence under this section is liable on summary conviction to a fine.

Ground 5 in Schedule 2 to the Housing Act 1985 (as amended by s.146 of the 1996 Act) enables a housing association to seek possession of a tenancy granted as a result of a false statement by the tenant or a person acting at the tenant's instigation.

1.5 Confirming registration

Applicants will receive confirmation from the Home Point team that their application has been registered together with:

- their registration date;
- the band they have been awarded;
- confirmation of which type and size of properties they are eligible to bid for; and
- their username, unique reference number and password for the website.

Applicants must check the accuracy of this information as it will be used to decide their priority for receiving an offer of housing

1.6 Change of Circumstances

Applicants are required to inform Home Point if their personal circumstances change and it may reasonably be expected to have an effect on their housing Register application. This includes any change in their address or household composition.

Changes in circumstances that lead to re-banding will be dealt with in accordance with this policy. Home Point will re-assess an application where there has been a change of circumstances and will notify the applicant in writing that this has been done. Where this has led to a change in priority applicants will be informed in writing stating the reasons, any time limits in the new banding, the effective date for the change in priority and the right to request a review of the decision.

2. Annual Review

The Home Point team undertake an annual review of applicants on the Register. This helps to ensure that those on the register are still interested in applying for suitable properties. It is expected that all applicants will be for appropriate properties. At the time of the annual review the bidding history of applicants in the higher priority bands will be part of the review process.

Each applicant will be contacted, in writing, on the anniversary of their application to ascertain if they still wish to be registered. Should there be no response to this letter **within 28 calendar days**, the application will be suspended. Further written contact will be sent to the applicant notifying them their application is suspended and if they do not respond **within 14 days** their application will be cancelled.

Applicants who subsequently decide they wish to re-join the register will need to apply in the normal way and will have their current circumstances assessed. The application date will not be backdated under these circumstances.

3. Closure of Applications

The Home Point team will close applications where:

- an applicant is housed as a result of the application;
- an applicant has failed to provide supporting evidence in the given time period of 28 days (see above) or other time limits specified in correspondence;
- an applicant fails to respond to the annual review within the set timescale above;
- an applicant has moved and failed to notify the team,
- an applicant persistently fails to respond to communication or requests for information over a reasonable timescale.
- an applicant has made a request for the application to be cancelled

Should an applicant subsequently wish to re-join the scheme then they will be required to complete a new application which will be processed accordingly based on their current circumstances and with a new registration date.

4. Advertising

Properties are advertised primarily through the Home Point website. Property adverts are also available at:

- Franklin House, Hereford;
- All partner offices;
- Herefordshire Council Customer Service Centres; and
- Public libraries in Herefordshire.

In partnership with the housing associations, the Home Point team endeavours to ensure that all advertisements are as comprehensive as possible. The service promotes informed choices and will help guide applicants to bid for properties they can realistically expect to secure. Advertisements will include as many of the following as possible:

- location;
- property type, size and floor level;
- nature of tenancy on offer;
- what type of heating it has and whether it has a heating charge payable that is not covered by housing benefit;
- any restrictions such as s.106 schemes;
- whether such things as a garden or parking are available with the property;
- the amount of rent and any other charges that are payable;
- photographs of the property and links to guides about the local area.

4.1 What is restrictive advertising and how is it applied under this policy?

This refers to adverts for individual properties which are subject to specific restrictions on the types of households whose bids will be considered for that property.

These household types will be given preference for the advertised properties to meet local requirements. Examples include:

a) Age

Adverts will clearly state where offers are restricted to people over a certain age.

b) Property type e.g. Sheltered scheme

Certain types of properties are only available for specific types of households. Where bids will only be accepted from designated household types this will be clearly labelled on the advert.

c) Section 106 developments

Section 106 agreements are legal agreements between local authorities and developers which are linked to a planning permission. Where these exist they normally grant priority for affordable housing to applicants with a local connection to the ward, parish or village. Bidders with a local connection will be shortlisted in banding priority and offered properties based on this priority. Properties governed by s106 agreements will be advertised as 'Local Connection Required'.

d) Local lettings plans

Local lettings plans are normally introduced to meet a particular local need or to address an issue affecting the local area. There are a number of these policies throughout the county. To be considered for a property within one of these schemes the applicant would have to meet the criteria listed in the advert. For example, applicants may need to have children over a certain age.

e) Transfer applicants

Properties withheld as part of the 25% restricted for existing tenants will be marked as 'withheld by landlord' or 'for existing tenants of (relevant housing association(s))'.

5. Bidding

Once the application is active, an applicant has to place a bid to express an interest in available properties. Applicants are only able to be considered for properties for which they are eligible.

Properties are advertised from Wednesday morning until midnight the following Tuesday night. This period is known as the advertising cycle. On occasion a landlord may need to withdraw a property during or after it has been advertised. In this instance no bidders will be entitled to an offer.

Applicants can place bids at any time during the advertising cycle via the following platforms:

- www.home-point.info ;
- an automated telephone number 0845 270 2550;
- by text on 0778 148 2312;
- contact a partner organisation in person.

Applicants can bid for up to 2 properties in each cycle and must indicate whether the bid is their 1st or 2nd choice. Depending on their method of bidding applicants can find out their position on the shortlist **at the time** they bid, together with the total number of bids **already** placed against the property. Position on the shortlist can change as additional bids are received. Applicants are able to see their queue position on current and historic bids via their online application.

The Home Point team can offer support with the bidding process, including making bids on the applicant's behalf if the applicant, for instance, is not able to use the bidding platforms effectively due to age, health or easy access to the bidding options.

5.1 Time-limited priority bidding

Applicants who are awarded priority in recognition of their urgent housing need will be awarded this priority on a time-limited basis. This acknowledges the urgency of the situation, both for the applicant and for the council. The time limits are stated in the banding table.

Time-limited priority can be reviewed and cancelled at any time if the applicant's circumstances change.

Priority applicants will be monitored throughout the initial time-limited period. During this time applicants should bid for any suitable advertised properties. This means that applicants will sometimes need to compromise on their ideal choice of housing in order to achieve the urgent move they need. It will not always be possible to meet all their preferences within the time available.

If the initial time-limit is reached and the applicant has not been housed, the Home Point team will review the priority and may cancel it. In conducting the review the team will take into consideration the following factors:

- Have there been any properties advertised that would have met the applicant's need?
- If so, why did the applicant choose not to bid or why were they unsuccessful.
- Has the applicant received appropriate support and help in accessing the bidding system?
- Have the applicant's circumstances remained the same or has the need for priority gone?

Having considered the above factors, the Home Point team may upon review:

- extend the priority for a further designated period (e.g. 12 or 26 weeks);
- place on auto bidding;
- arrange for a direct offer to be made.

6. HOMELESS HOUSEHOLDS WHO ARE OWED THE FULL HOMELESSNESS DUTY

Homelessness assessments are determined by a Housing Solutions Officer on behalf of Herefordshire Council and where the council accepts a duty to provide secure accommodation, under the Housing Act 1996 s. 193(2), s 195(2) or other statutory duties, time-limited priority bidding for 12 weeks applies.

Applicants who are awarded Band P because of this duty must bid on **all** properties that would constitute a reasonable offer during that period. Assisted bidding will be offered to all applicants to enable them to receive an early suitable offer. At the end of their time-limited priority the award will be reviewed and one, or more, of the following actions will be taken:

- Auto bidding;
- Direct offer;
- Extension of priority status for a further 12 weeks.

6.1 Auto bidding

The Home Point team may arrange for automatic bidding on suitable properties on behalf of the homeless household. Properties that are bid on may be outside the areas of choice where the applicant would prefer live. Areas can be excluded by agreement if they are shown to be unsuitable for an applicant and a bid will not be made in these areas.

6.2 Direct offers

The majority of available properties will be advertised and open for eligible households to place bids through the Choice Based Lettings Scheme. However, there are circumstances where a property may be let outside the scheme by a direct letting. This may be done where households accepted as homeless have failed to bid for properties that were available and suitable for their needs.

6.3 Extension of priority status for a further 12 weeks

In exceptional circumstances the priority status can be extended for a further 12 weeks. On these occasions assisted bidding will be undertaken as part of the agreement to extend priority.

6.4 Refusal of Offers by Households Owed the Statutory Homelessness Duty

If a homeless household refuses an offer of suitable accommodation Herefordshire Council may decide that its duty under the homelessness legislation has been discharged and the household banding will be re-assessed. Applicants will be advised of the consequences of refusal and of their right to request a review of this decision. The applicant has this right whether they refuse or accept the offer of accommodation.

6.5 Discharge of Homelessness Duty to the Private Rented Sector

The Localism Act 2011 allows local authorities to discharge their full housing duty by an offer in the private rented sector, provided the offer is for an Assured Shorthold Tenancy with a minimum fixed term of one year. Herefordshire Council has chosen to use this power to discharge the full duty when appropriate.

Applicants should not decline an offer made as a final discharge of the homelessness duty. If they do so Herefordshire Council may decide that its duty has been discharged and the household banding will be re-assessed. The applicant will retain the right to request a review of the suitability whether or not they accept the offer.

Where the homelessness duty is discharged to the Private Rented Sector, applicants who are subsequently given a section 21 notice to leave within two years of the offer being accepted, where the applicant is eligible for assistance and not intentionally homeless, the homelessness duty to secure further suitable accommodation is revived. The duty revives even if the applicant no longer has a priority need, but it only applies to the first incidence of homelessness within the two year period.

HOW PROPERTIES ARE LET

1. Nominations

An allocation is a nomination of applicants to a housing association where the council has nomination rights. The 25% of void properties that are available to existing tenants without a housing need recognised in this policy are not allocations within the meaning of the policy.

When a vacancy arises in the rented stock of a housing association within the county, and the property has been made available for allocation through the housing register and choice based letting scheme, an allocation will normally be made to the applicant with the highest priority for the property type available.

Where a nomination is made, the housing association concerned will consider if the applicant is acceptable under their own lettings policy.

As part of their allocation policies, individual housing associations usually have exclusion policies which can affect whether an applicant is offered a property. Applicants should be aware of the potential for these policies to adversely affect the likelihood that they will receive an offer of accommodation.

While the Council acknowledges the right of their housing association partners to formulate their own allocation and exclusion policies, it is expected that these will be fair and reasonable, minimising the risk of exclusion from social housing by ensuring that they are applied to reflect the spirit of published allocation policies, including this overarching allocation policy.

The Council expects exclusion policies to be flexible, with cases being considered on an individual basis. The following criteria should be applied:

- there must be reliable evidence of unacceptable behaviour;
- there should not be inflexible specific time periods as far as possible;

- partners should communicate effectively with the applicant and the Home Point team;
- there should be provision for discretion;
- there should be a recognition where special circumstances arise e.g. people with learning disabilities, mental health issues, statutory homelessness duties arise.

Each case would be considered upon its own merits and subject to the spirit of the Rehabilitation of Offenders Act 1974 according to individual circumstances.

Housing associations individual lettings policies may be viewed through their own websites which can be accessed from the Home Point website.

2. Shortlisting

At the end of the advertising cycle the bidders are shortlisted by housing need which includes property size required. Priority is indicated by band and, within the band, by date.

The housing association is able to view the shortlist and will then carry out their selection processes.

Shortlist position does not guarantee an offer from the housing association.

A bid for a property will not be considered by the association if the applicant's household does not meet the size, age or disability requirements for that property unless there are exceptional circumstances which should be taken into account.

A property may not always be offered to the applicant at the top of the shortlist if there are reasons to skip the applicant. Skipping bids can be done in defined circumstances and this is monitored and reported to the partnership.

Partner landlords may require further information from bidders before making a decision to offer the property.

Landlords are entitled to carry out an affordability assessment to ensure that the tenancy is viable. Where the assessment shows that the tenancy would not be sustainable the landlord may withdraw the offer. This should only be done where the assessment has included reviewing the options to maximise the prospective tenant's income.

2.1 Offers

Applicants should note that all offers of housing are made by the relevant housing association not the Home Point team.

Further verification of circumstances may be undertaken to ensure the applicant is still eligible for the property prior to an offer being made. Applicants will be required to provide information within a specified timescale.

Before offering a property to a customer the following checks will be made:

- The band award is correct;
- Circumstances have not changed;
- Household composition matches the property size;
- Any other restrictions placed upon the property or customer that would prevent them from receiving an offer.

Offers may be made in writing, by phone or in person. Applicants should be made aware of the timescale in which they must respond. This should not be less than 2 working days.

Applicants should be given 2 working days to respond to an offer after viewing the property.

2.2 Refusals of offers

When an applicant refuses an offer, they will be expected to provide the reasons for the refusal. This information is necessary to identify why the property was not acceptable and to ensure that future offers are more likely to be accepted.

Applicants who refuse 2 or more reasonable offers will have their application reviewed. Landlords should advise applicants at the time of their refusal if they consider it to be unreasonable and explain why.

Applicants will be advised in writing of the outcome of the re-assessment. If the refusals are found to be unreasonable the application will normally be closed and the applicant will not be eligible to re-apply for 12 months from the date the application is closed. Applicants have the right to appeal against this decision. For further details see Appendix C.

3. Withdrawal of Adverts and Offers

Occasionally, a housing association may be required to withdraw a property advert, circumstances for this may include:

- if it becomes apparent that the property will be let through direct lets in accordance with this policy ;
- the current tenant of the property being advertised has withdrawn their notice terminating their tenancy of that property, so the property is no longer available;
- Significantly incorrect information had been advertised in respect of the property or applicants eligibility for that property.

3.1 Reasons for the withdrawal of any property adverts will be publicly available.

In exceptional circumstances a senior officer of a partner housing association may authorise the withdrawal of an offer. Circumstances may include, but are not limited to:

- where it is clear that an applicant is not capable of understanding the responsibilities associated with being a tenant or they do not clearly understand what they are signing when we ask them to sign a tenancy agreement or associated paperwork;
- the current tenant of the property being advertised has withdrawn their notice terminating their tenancy of that property, so the property is no longer available ;
- Where an applicant has failed to respond to contact from a partner housing association after 2 working days.

4. Publishing feedback on let properties

Home Point will publish lettings results on the website and will include the following information:

- The street address;
- The closing date of the bidding cycle;
- The total number of bids made for the property;
- The successful applicant's priority band and date.

This feedback helps applicants understand the likelihood of success in obtaining housing when making future bids.

Individual applicants can view the outcome of their personal bids through the website.

Lettings are monitored by the Home Point partnership to ensure that the partners' aims are being achieved and to provide a basis for improvement of the choice based lettings service.

APPENDICES

APPENDIX A: List of partners and contact details



Bromford Housing Group
11 Miller Court, Severn Drive
Tewkesbury Business Park
Tewkesbury
Gloucestershire
GL20 8ND
Tel: 0330 1234 034

Email: customerservices@bromford.co.uk
Website: www.bromford.co.uk



Stonewater
Benedict Court, Southern Avenue
Leominster
Herefordshire
HR6 0QF
Tel: 01568 610 100

Email: leominster@stonewater.org
Website: www.stonewater.org



Festival House
Groewood Road
Enigma Business Park
Malvern
WR14 1GD
Tel: 01684 579 579

Email: info@fortisliving.com
Website: www.festivalhousing.org



Sanctuary Housing Association
164 Birmingham Road
West Bromwich
B70 6QG

Email: contactus@sanctuary-housing.co.uk
Website: www.sanctuary-housing.co.uk



Housing Solutions Team
Franklin House
4 Commercial Road
Hereford
HR1 2BB
Tel: 01432 261 600

Website: www.herefordshire.gov.uk



Herefordshire Housing Ltd
Legion Way
Hereford
HR1 1LN
Tel: 0330 777 4321

Website: www.hhl.org.uk



Kemble Housing
44 Berrington Street
Hereford
HR4 0BJ
Tel: 01432 377 900

Email: herefordcst@wmhousing.co.uk
Website: www.kemblehousing.co.uk



South Shropshire Housing Association
The Gateway
Auction Yard
Craven Arms
Shropshire, SY7 9BW
Tel: 0300 303 1190

Email: enquiries@shropshirehousing.co.uk
Website: www.shropshirehousing.co.uk



Two Rivers Housing
Rivers Meet
Cleeve Mill Lane, Newent
Gloucestershire
GL18 1DS
Tel: 0800 316 0897

Email: customerservices@2rh.org.uk
Website: www.tworivershousing.org.uk



The Guinness Partnership
Gloucester Officer
2 St Michael's Court
Brunswick Road
Gloucester, GL1 1JB
08456 044 529

Website: www.guinnesspartnership.com

APPENDIX B: Exclusions from the Register and Reduced Preference

1. What is meant by exclusion and reduced preference?

1.1 Exclusions

These occur when an applicant has been assessed but, due to their behaviour they are excluded for a period of 6 months during which time the applicant should address the cause of their exclusion. Generally the applicant will be expected to take specific action such as making payments to reduce arrears.

1.2 Reduced Preference (see below)

This occurs when an applicant has been assessed for and accepted onto the housing register and is informed that their priority for housing has been reduced because of their behaviour and they have been placed into a lower band. They will remain in the lower band until their conduct or their debt has improved or there has been a change in circumstances. Generally the applicant will be expected to take specific action to address such as making payments to reduce arrears.

2. Exclusions: Unacceptable Behaviour

The Code of Guidance (Allocation of Accommodation June 2012) and the Localism Act 2011 enable local authorities to adopt criteria which disqualify individuals who satisfy the reasonable preference grounds on the grounds of poor behaviour. Herefordshire Council has retained the principles of the previous 'unacceptable behaviour' test in this regard.

In summary an applicant will not qualify for the register if the applicant or a member of his/her household has been guilty of 'unacceptable behaviour' that is serious enough to have entitled a landlord to outright possession.

Unacceptable behaviour can include:

- Significant rent arrears at a tenancy or former tenancy;
- Causing nuisance and threat to neighbours;
- Being violent towards a partner or family member;
- Conviction for committing offences in or near the property.

Each case will be judged on its own merits and efforts will be made to resolve any issues which prevent applicants from joining the Register as denying access to social housing can result in broader social exclusion for the households involved, and have adverse effects for the community as a whole.

2.1 Exclusion periods and other conditions associated with behaviour

Applicants who fail the 'unacceptable behaviour' test may be excluded from applying to join or remain on the register for 6 months unless the applicant can demonstrate they meet other conditions.

Where eviction has occurred on the grounds of anti-social behaviour, the applicant may need to show that they are addressing the issues before qualifying for inclusion on the register. This may include undertaking programmes with support agencies to show their understanding and commitment to behaviour improvement.

Where the applicant has significant rent/former tenant arrears the applicant must make arrangement to pay the debt and must maintain the arrangement from the date of its commencement for the full remaining time the applicant is excluded. This would need to be for a minimum of 13 weeks. The payment arrangement needs to continue once the applicant is made active on the register. Failure to do so is likely to adversely affect the chances of being housed.

It should be noted that an application is likely to be placed in a reduced preference band after the exclusion 'term' has elapsed.

2.2 Applicants with special needs

Where Home Point has reason to believe that unacceptable behaviour is due to a physical, mental or learning disability, the person will not be excluded from the Register without considering whether they would be able to maintain a tenancy satisfactorily with appropriate care and support.

Home Point will consult as appropriate with any relevant agencies, including Health and Social Services, the Medical Advisor or other medical advisors, and local providers of support services.

2.3 Exceptional circumstances

This exclusion policy may be varied in exceptional case. For example, the applicant or tenant's need to move on social welfare or medical grounds is considered a sufficiently high priority to override their history of unacceptable behaviour.

3. Reduced Preference bands

Applicants whose behaviour is not serious enough to be excluded under these provisions may be awarded a **reduced preference** when the application is assessed

and also may be overlooked for offers of accommodation by the housing association which will not accept applicants who, for instance, have a significant housing debt.

It is not intended that a person's behaviour at one time in their life should permanently exclude them from social housing. Applicants who are placed in a reduced preference band due to anti-social behaviour or damage to property will only receive reduced preference if the incidents or convictions occurred within the previous 12 months.

If, at the time of application, there has been no repeat of the behaviour in that time the applicant will not be given reduced preference.

With regards to former or current rent arrears and money owed to the local authority, if the applicant has made an arrangement to pay the debts and has been maintaining this arrangement for a 26 week period, the reduced preference will be removed as long as the payment arrangements are maintained.

Anyone wishing to appeal should refer to Appendix C of this policy.

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APPENDIX C: Right to review decisions on applications or offers

All applicants have the right to ask for a review of a decision, if they consider they have been unfairly or unreasonably treated having regard to the provisions of this policy. For example, a decision about:

- exclusion or removal from the Register;
- type of property the applicant is eligible for;
- suitability of accommodation offered;
- information that has been taken into account when assessing the application;
- the band into which they have been placed;
- instances of an application being 'skipped';
- any decision taken in relation to their registration.

Initial requests for reviews will be dealt with by the organisation within the partnership that has been mainly dealing with that application .i.e. the organisation that has notified the applicant on the issue they would like reviewed.

For reviews of decisions about the register including banding, property eligibility and decisions in relation to homeless applicant's requests should be addressed initially to Housing Solutions and Home Point Team Leader at Herefordshire Council unless the manager was previously involved in the decision.

For decisions regarding 'skipping' or offers of accommodation, unless from an applicant owed the full homelessness duty, the Housing Manager of the relevant partner housing association should be contacted. See Appendix A for contact details.

Stage 1

The appeal must be made in writing within 21 calendar days of the date of the decision letter, stating the grounds for the appeal. The appeal will be considered and a decision will normally be given within 21 calendar days. In complex cases it may not be possible to give a decision in 21 days and it may take longer. Where this is the case the applicant/advocate will be notified in writing prior to expiry of the 21 day period

If an applicant is unhappy with the initial review decision they should notify the relevant organisation, in writing, within 21 days of receipt of that decision, requesting a second review.

Stage 2

If the applicant is unhappy with the decision made, they may request that a further review be carried out by the Home Point Board of Management (or their nominated representative). This request must be made in writing within 14 calendar days of the date of the stage 1 decision. A decision will normally be given in 21 calendar days, subject to extension where necessary. If the applicant remains unhappy with the outcome of the appeal, the applicant may make a complaint to the Housing Ombudsman.

APPENDIX D: Housing Benefit

Households on low incomes or out of work may be able to claim housing benefit, or the housing element of its replacement, Universal Credit (see below) for help with the payment of housing costs. Housing Benefit can pay for part or all of your rent. How much you get depends on your income and circumstances.

The Universal Credit system is being rolled out across the country now and will affect all claimants in Herefordshire in the next few years. Applicants should be aware that new claimants are likely to be those affected first.

Applicants should also be aware that there are significant changes being made to benefit entitlements and should ensure they understand what their entitlements are and how they might change. It is not clear whether there will be any amendment to the proposed changes or whether further changes are likely to be introduced at this time. Applicants should be aware that further changes to the benefit system may affect the Allocation policy and Herefordshire Council retains the right to make amendments to reflect alterations to the benefits system.

Young or single households

If you are single and under 35, you can generally only get Housing Benefit for bed-sit accommodation or a single room in shared accommodation. There are some exceptions to this rule, notably for looked after children.

As part of the Summer Budget 2015 the Chancellor announced the removal of entitlement to the housing element of Universal Credit (currently Housing Benefit) from young people aged 18-21, with some exceptions, from April 2017.

Sharing bedrooms

Your Housing Benefit could be reduced if you live in social housing and have a spare bedroom. The reduction is:

- 14% of the 'eligible rent' for 1 spare bedroom;
- 25% of the 'eligible rent' for 2 or more spare bedrooms.

For housing benefit claims the following are expected to share:

- an adult couple;
- 2 children under 16 of the same sex;
- 2 children under 10 (regardless of sex).

This Allocation policy enables households to apply for additional bedrooms at an earlier age (8 and 15) but applicants should be aware that, if in receipt of benefits, they will have to prove to the housing association that they can afford to pay the rent that will not be covered by housing benefit or the housing element of Universal Credit.

The following can have their own bedroom:

- a single adult (16 or over);
- a child that would normally share but shared bedrooms are already taken, e.g. you have 3 children and 2 already share;
- children who can't share because of a disability or medical condition;
- a non-resident overnight carer for you or your partner (but only if they must stay overnight).

One spare bedroom is allowed for:

- an approved foster carer who is between placements but only for up to 52 weeks from the end of the last placement;
- a newly approved foster carer for up to 52 weeks from the date of approval if no child is placed with them during that time.

For further information see the webpages at <https://www.gov.uk/housing-benefit>

Universal Credit

Universal Credit is a benefit for people who are on a low income or are out of work.

In the majority of cases Universal Credit will be a single, monthly payment which is paid in arrears directly into the claimant's account. Payments will include all eligible housing costs. Couples living in the same household will receive one monthly payment between them. Any other adults living in the household will receive their own separate payment.

The housing element of the Universal Credit payment is based on the eligible rent and service charge costs. In the majority of cases eligible housing costs will be paid directly to the claimant as part of the single Universal Credit (UC) payment. For social housing tenants the housing element of the UC payment should be their actual housing costs. This will not include service charges that are not covered by UC or charges for utilities, such as water or electricity.

If a social housing tenant has any **under-occupied bedrooms** their housing element will be reduced by

- 14% for one spare bedroom;
- 25% for two or more spare bedrooms.

You have to pay rent to your landlord directly if you get Universal Credit. For further information see the website at <https://www.gov.uk/universal-credit>.

All claimants should be aware that the benefit cap puts a limit on the total amount of benefit that most people aged 16 to 64 can get.

APPENDIX E: Banding detail

<p>Statutory or severe overcrowding (reasonable preference)</p>	<p>This is awarded to tenants who are statutorily overcrowded as defined by Part X of the Housing Act 1985, or where a household is three or more bed spaces deficient under the HHSRS, and has not deliberately worsened their housing situation.</p> <p>Applicants may need to provide bedroom sizes in order for household bedroom space requirements to be assessed.</p> <p>A room intended for use as a bedroom but used for another purpose will still be classified as a bedroom, subject to it meeting the space standards for bedrooms.</p>
<p>Under-occupation by a social housing tenant (releasing 1 or more bedrooms)</p>	<p>Households presently under-occupying a rented home owned by a partner housing association that is situated in Herefordshire and the applicant wants to move to a property with fewer bedrooms.</p>
<p>Serious state of disrepair (reasonable preference)</p>	<p>Households will be placed in this band in the following circumstances:</p> <ul style="list-style-type: none"> • Where the hazard(s) are so severe or numerous that residential use of the property is prohibited. <p>The assessment of hazard(s) will be carried out by Environmental Health and Trading Standards team using the Housing Health and Safety Ratings System.</p>
<p>Homeless households who are owed a full housing duty (reasonable preference)</p>	<p>Households who a household that has been accepted as homeless by Herefordshire Council under part 7 of the Housing Act 1996 and who is owed the ‘full duty’ under s. 193(2) (in priority need and unintentionally homeless), or s. 195(2) (in priority need and threatened with unintentional homelessness) of the Housing Act 1996, or ss. 65(2) or 68(2) of the Housing Act 1985.</p>
<p>Care Leaver (reasonable preference)</p>	<p>This relates to referrals from Children’s Wellbeing under s.27 Children Act 1989 or where the young person is deemed to be a relevant of eligible child under the Children Leaving Care Act 2000, as amended.</p>
<p>End of Agricultural or service tied tenancy (reasonable preference)</p>	<p>This may apply to:</p> <ul style="list-style-type: none"> • households where an agricultural worker is being displaced to accommodate another agricultural worker and the farmer cannot provide suitable alternative accommodation; <p>The Rent (Agriculture) Act 1976 requires a local housing authority to use their best endeavours to provide accommodation for a qualifying displaced agricultural worker subject to the provisions of s.27. If the authority is satisfied that the applicant's case is substantiated, it is a duty to endeavour to provide suitable alternative accommodation for the displaced worker;</p> <ul style="list-style-type: none"> • households in council service or related tenancies which are coming to an end.

Homeless, unintentional, not in priority need (reasonable preference)	Households assessed by the council's Housing Solutions team as being unintentionally homeless but not in priority need.
Lacking or sharing facilities with non-family members (reasonable preference)	Households who do not have access to a bathroom, kitchen or inside WC or whose accommodation lacks hot or cold water supplies, electricity supply or provision of adequate sources of heating. Households sharing a kitchen, bathroom/WC with non-family members who are not on the application. Family members would include parents, step parents, children, step-children, siblings and step siblings and grandparents.
Major adaptations no longer required	Tenants of partner housing associations who no longer require a property where major adaptations such as a stair lift or level access shower have been installed.
Move on from supported/specialised accommodation (reasonable preference)	Tenants of supported or specialised housing who have been assessed by their support provider as being ready to move into settled accommodation. Formal assessment and confirmation of that assessment will be required.
Overcrowding by 1 or 2 bed spaces (reasonable preference)	Households where the property is one or two bed spaces deficient and the household has not deliberately worsened their housing situation. Applicants may need to provide bedroom sizes in order for household bedroom space requirements to be assessed. A room intended for use as a bedroom but used for another purpose will still be classified as a bedroom, subject to it meeting the space standards for bedrooms
Right to move for social housing tenants	This applies to a social housing tenant who works in the county or has the offer of work in the county in accordance with the Right to Move guidance 2015.
Referral from Herefordshire Council's Adult Wellbeing or Children's Wellbeing Directorates.	Households who require urgent alternative accommodation on safeguarding or associated grounds. Award of this priority is subject to referral to, and agreement from, Head of Prevention and Support, Adult Wellbeing Directorate.
Verified harassment, witness intimidation	Households where the police or relevant support agencies advise that there is a need for alternative accommodation to protect witnesses or prevent severe harassment and where prosecution of the offender is intended.
Verified urgent medical/welfare need (reasonable preference)	Households where there is an urgent need to move to prevent significant deterioration in, or improve significantly, the health or well-being by the provision of a different type of accommodation. Rehousing must achieve a significant health gain. Medical evidence will be required and will be used to assess banding. This banding will not be awarded where the need is temporary as a result of injury or surgery.
Verified urgent need to move to a particular area to avoid	Households who need to move due to employment, education or training, where the household has no access to a private vehicle

hardship (reasonable preference)	AND the use of public transport is not available or the journey would take over 1.5 hours in each direction. Applicants who need to move urgently to give or receive support will need to provide confirmation of the support provision available, and a health and well-being assessment may be required to determine the most appropriate type of property for the person's needs.
Affordability	30% or more of gross income of the household is spent on housing costs, excluding child benefit, attendance allowance (or successor benefits). Applicants will need to provide evidence for an income/expenditure assessment to be completed.
Households with children aged 8 or under living above first floor (reasonable preference)	This applies to households where there is one child (or more) aged 8 or under. Households must live above the first floor i.e. there are 2 flights of stairs to reach the front door of the home.
Intentional homeless (reasonable preference)	As defined by the Housing Act 1996, as amended. Households who are assessed as being intentionally homeless may have a reduced preference depending on the reason for their status as intentionally homeless.
Verified medical/welfare need (reasonable preference)	Households where there is a need to prevent deterioration in, or improve, the health or well-being by the provision of a different type of accommodation. Medical evidence will be required. This banding may be considered where surgery is required for the period up to the surgery and during any recuperation period. Once an applicant has recovered and their housing need is resolved the banding will be removed.
Verified need to move to avoid hardship (reasonable preference)	Households who need to move due to employment, education or training, where the household has no access to a private vehicle AND the use of public transport is not available or the journey would take over 1 hour in each direction. Applicants who need to move to give or receive support will need to provide confirmation of the support provision available, and a health and well-being assessment may be required to determine the most appropriate type of property for the person's needs.
Proven need for sheltered housing with assets up to £150K	Households over the age of 60 who have been assessed as in need of sheltered accommodation but whose ability to access open market provision is limited due to total capital assets of under £150K.
Relationship breakdown	One partner is remaining in the 'family' home and the partner leaving the home does not have the financial resources to resolve their own housing need.
Rural localities /s.106 local connection schemes	In order to promote sustainable communities, households that do not have a housing need under other criteria in this allocation scheme but have a local connection to a specific parish may qualify for section 106 affordable housing developments in the parish(es) to which they have a local connection.

Sharing siblings	Adult siblings living in the family home or not in settled accommodation who apply to share as joint tenants for properties on the first floor and above.
Applicants/households who:	Are within the reasonable preference categories but who do not have a local connection to the county of Herefordshire.
	Have deliberately worsened their housing circumstances.
	Have housing related debts to the local authority or a housing association.
	Have committed acts of anti-social behaviour or other breaches of tenancy not severe enough to have been subject to an outright possession order, a demotion order, an ASBI or other injunction, criminal proceedings.
	Have provided false information on their application for social housing.

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APPENDIX F: Monitoring and review

In order to ensure that the scheme is achieving its aims of being as open and accessible as possible to all members of the community the Partnership will monitor the following:

- a) The number of applicants on the register by band each quarter.
- b) The number of allocations in the financial year (cumulative) each quarter:
 - By property type (and bedrooms),
 - Separate listings for general needs and sheltered housing,
 - Whether restricted (i.e. criteria used in advert),
 - Bids overlooked,
 - How many allocations by banding,
 - Properties let outside of the scheme,
 - Local connection.
- c) Applicants who have made a bid and been “skipped” due to a
 - i) housing related debt;
 - ii) Anti-social behaviour.
- d) Property Feedback for each allocation as follows monthly:
 - Address of property,
 - No of beds,
 - Type,
 - General / Sheltered,
 - No of bids,
 - Refusals,
 - Successful applicant bid,
 - Application/banding dates,
 - Local connection
- e) List of all properties let by the scheme for current financial year each quarter.
- f) Refusals and number of complaints about the scheme each quarter.
- g) Non bidders, customer satisfaction & performance against service standards annually,

APPENDIX G: Service standards for the Home Point team

The following outlines our intended approach in working with people who use Herefordshire Council services:

We will treat people with dignity and respect, and expect the same consideration in return.

We will respect people's privacy and confidentiality.

We will listen and respond to concerns, and act to resolve queries where we can and have the powers to do so.

We will prioritise our resources to deal with areas of high risk, specifically danger to the public and where the most vulnerable in the community may be affected.

We can provide an interpreting service for customers who do not speak English or where English is not sufficient.

We can provide information in large print, audio and Braille on request.

We will design services so that they are accessible by disabled people and ensure reasonable adjustments are made where needed.

We will evaluate our practices to make sure we are offering the best service possible next to the resources we have available.

We will always wear ID badges and identify ourselves when responding to phone calls and written correspondence.



APPENDIX H: Complaints about the Home Point service

If you are not happy

We welcome positive feedback when you are happy with the service provided as it lets us know what we are doing right.

If you are unhappy, we will work with you to resolve your query or issue at a service level, and if you are not happy with the outcome we will explain why we've taken that particular course of action or find an alternative remedy.

If you are still not happy with the outcome the following routes can be taken.

Formal complaint

A formal complaint is an expression of dissatisfaction about the standard of service, action or lack of action by Herefordshire Council, our staff or contractors.

This could be based on stated standards not being met or not what the customer thinks is reasonable:

- We are doing something the customer did not want;
- We carried out duties in an unsatisfactory way or our staff or contractors behaved in an unacceptable way;
- We failed to do something which was asked for;
- We should have taken some action;
- Generally, a complaint has to be made within 12 months from the day the matter occurred or came to the notice of the complainant.

Formal complaints to the Council will be dealt with only through the Information Access team and we will not reinvestigate the same complaint. For further information visit the Council's [make a complaint](#) page.

Complaints about the service provided by partner housing associations

These should be dealt with through the specific housing association's Complaint Policy which is available on their websites. See Appendix A for contact details.

APPENDIX J: Herefordshire Council Tenancy Strategy 2015 - 2018

1. Introduction

Herefordshire council developed the first Tenancy Strategy, 2012 – 2015 in accordance with the duty placed on local authorities by The Localism Act 2011 (s.150) to “*publish a strategy setting out the matters to which the registered providers (Housing Association’s) of social housing for its district are to have due regard to in formulating policies relating to:*

- (a) the kinds of tenancy they grant,*
- (b) the circumstances in which they will grant a tenancy of a particular kind,*
- (c) where they grant tenancies for a certain term, the length of the terms and*
- (d) the circumstances in which they will grant a further tenancy on the coming to an end of an existing tenancy.*

The flexibilities provided by the Localism Act 2011 provided an opportunity to address the following issues:

- (a) Better use of social and affordable housing to more effectively address housing need,*
- (b) Better use of social and affordable housing to reduce costs for the housing sector as a whole,*
- (c) Increased local and customer accountability for the use of social and affordable housing,*
- (d) Better use of social and affordable housing to contribute to sustainable community outcomes.*

The Act also brought about a revised Regulatory Framework and Tenancy Standard, (Homes and Communities Agency, 2012), which requires housing association’s to let their homes in a fair, transparent and efficient way. They shall take into account the housing needs and aspirations of tenants and potential tenants. Housing associations shall demonstrate how their lettings:

- (a) Make the best use of available housing,*
- (b) Are compatible with the purpose and the nature of the housing offered,*
- (c) Contribute to the local authorities’ strategic housing function and sustainable communities.*

Whilst Herefordshire has no council housing stock, the impact of the proposals in the Housing and Planning Bill 2015, to end council’s issuing lifetime tenancies, may eventually impact on housing associations. The Bill proposes that all new council tenancies granted will be of between two and five years duration, with a review of circumstances being carried out before deciding whether to renew the tenancy, offer alternative social housing or terminate the tenancy.

Links are provided below, to the four largest housing association’s websites currently operating in the county:

1. Herefordshire Housing Ltd

<http://www.hhl.org.uk/news-leaflets/all-our-documents/#toggle-id-2>

2. Stonewater

<https://www.stonewater.org/for-residents/housing-and-residents-policies/>

3. West Mercia Housing

<http://www.wmhousing.co.uk/help-advice/Publications>

4. Fortis Living

<https://www.fortisliving.com/home>

The Tenancy Strategy has due regard to the Housing Allocation Policy 2016 for Herefordshire and Homelessness Prevention Strategy 2015-18.

These documents can be found at www.herefordshire.gov.uk/housing/

2. Local context, vision and priorities

Herefordshire is a predominately rural county of 842 square miles situated in the south-west corner of the West Midlands region. The city of Hereford is the major location in the county for employment, administration, health services, education facilities and shopping. The principal locations are the five market towns of Bromyard, Kington, Leominster, Ledbury and Ross on Wye. Overall (census data 2011) the total housing stock comprises of 53,800 owner occupation, 10,903 social housing and 13,600 private rented sector.

A particular feature of the county is a very high proportion of detached housing, which represents 42.4% of the housing stock compared to 23.7% across the West Midlands and 22.3% across England.

Current data indicates that Housing in Multiple Occupation represents less than 1% of the total housing stock in Herefordshire.

Partner housing associations follow the overarching Housing Allocation Policy and have due regard to the Tenancy Strategy, when developing their own policies, to assist this council in meeting its priorities and statutory duties. The main aim of both documents is to meet the housing need of those eligible to register for social housing.

All the policies should have consideration to the main themes from Herefordshire's council Plan.

These priorities are explained in more detail on the [2014/15 budget consultation page](#).

3. Housing Affordability

Affordable housing is allocated to those in the greatest housing need. It can be a challenge, for low income households, to access suitable affordable housing in Herefordshire. There is a limited supply of appropriate accommodation, particularly in the county's rural areas. Trying to access the private-rented sector can present challenges, due to the large deposit often required and Local Housing Allowance (LHA) rates lower than the private rental levels that have changed very little, in Herefordshire, since September 2011.

Local Housing Allowance Rates for 1st April 2015 to 31st March 2016.

Room Size	LHA rates for Herefordshire
Shared Accommodation	£57.64
1 Bedroom	£92.05
2 Bedroom	£117.37
3 Bedroom	£135.19

The chart below is a current estimate, by Herefordshire Council Research Team, of the cost of private rental-weekly. Private rental levels have been monitored and changed very little since September 2011.

Room Size	Estimated cost of private rental-weekly
1 Bedroom	£102
2 Bedroom	£127
3 Bedroom	£150

The chart below shows the average housing association rental-weekly in 2014.

Room Size	Average housing association rental-weekly
1 Bedroom	£71.00
2 Bedroom	£82.10
3 Bedroom	£93.20

As the charts above show, rent levels for housing association accommodation are significantly lower than rent levels in the private rented sector, making housing association accommodation more affordable for low income households. The provision of affordable housing is a priority for the county and is a common theme through key strategic documents. This is due to the combination of low earnings, the median earnings for 2014 is £21,160, and high house prices, the median house price April 2014-March 2015 is £192,000, which creates significant barriers to accessing the housing market for residents of the county.

For more details the Herefordshire Council Key Housing Fact Sheet details the housing stock, affordability and need in Herefordshire see link below.

<https://www.herefordshire.gov.uk/housing/advice/strategic-housing-information>

The July 2015 budget introduced a reduction in housing association rents of 1% for the next four years. This could have an impact on the future number of new homes being built in Herefordshire. Housing associations have already had to make estimated adjustments to their business plans. Revised business plans were sent to the Homes and Communities Agency by the end of October 2015 before the enactment of the Housing Bill or Welfare Reform Act.

4. Use of Fixed Term Tenancies

In Herefordshire the majority of social tenancies granted are still assured tenancies. Whilst the benefits of offering fixed term tenancies are recognised, the practical ability for low income families to be in a position to move on into alternative accommodation is a challenge. From April 2016 a benefit cap reduction will reduce the income of families on benefits to a maximum of £20,000.

Introductory, starter and probationary tenancies will be supported where issued to new tenants and used in conjunction with fixed term tenancies. Once an introductory tenancy period, (normally 12 months), is successfully completed, (i.e. with no breaches of tenancy conditions), a further tenancy may be created or alternative housing options advised within the private and social sectors.

Where housing associations use their discretion to grant fixed term tenancies it is requested that they consider the following:

- A minimum five year fixed tenancy, wherever possible, excluding any introductory period.
- Longer tenancies five to ten years for specialist, adapted properties, limited stock larger properties or families with dependent school-aged children attending a specialist local school.
- Lifetime tenancies are used for sheltered housing or extra care housing.
- Fixed term tenancies are not used to address breaches of tenancy, where there are existing legal remedies.
- Two year tenancies should only be used where someone is expected to move on to more permanent accommodation or requires short term housing.
- Where a fixed tenancy is used, housing associations should give tenants appropriate advice and information to tenants about their housing options at the time of letting and when their tenancy review will be carried out.
- It is expected, that tenancies will be renewed following a review, provided that the tenant's circumstances remain the same.

5. Secure and Assured Tenancies

Secure and Assured tenancies must be retained for housing association tenants whose tenancy commenced before 1 April 2012.

Whilst lifetime tenancies will be more appropriate in some cases, this does not suggest this is linked to a particular property and tenants will be encouraged to move to more suitable property as their needs change over time.

6. Reviewing a Fixed Term Tenancy

Housing associations are required to formulate policies that will govern the process under which tenancies will either be renewed or terminated at the end of a fixed-term. Within this process the impact on the following should be considered:

- Tackling worklessness and promoting financial inclusion.
- The household's current and future likely income.
- Addressing overcrowding and under-occupation.
- The prevention and alleviation of homelessness.
- The purpose of the accommodation and any subsequent changes since the commencement of the tenancy.
- The needs of individual households and any subsequent changes since the commencement of the tenancy. Housing associations are encouraged to work closely with other agencies where appropriate in understanding the needs of the household.
- The sustainability of the community.
- The efficient use and availability of housing stock.
- The stability of family life and education where children are part of the household.

Where a decision has been taken by a housing association not to renew a tenancy at the end of a fixed-term, the provider should:

- Reviews should be undertaken at least six months prior to the end of the Fixed Term Tenancy.
- Seek to inform the tenant at the earliest possible opportunity, no less than five months, to make them aware of the housing associations intentions.
- Provide households affected by the termination of a tenancy with any relevant advice and assistance that will support them in successfully relocating to alternative accommodation and prevent homelessness.

- Formally notify and actively work with the council's Housing Solutions Team to prevent homelessness occurring as a result of ending a fixed term tenancy.

All housing associations are expected to have an appeal process in place through which the tenant is able to appeal the decision taken.

Herefordshire Council will work with local housing associations to monitor the use of fixed term tenancies, including their review, renewal and termination.

Committed is required from housing associations to ensure that any decision to terminate a tenancy, does not lead to an increase in levels of homelessness in Herefordshire. In the majority of circumstances, affordable housing providers should seek to renew a tenancy at the end of a fixed-term period or seek to secure alternative and more appropriate accommodation across the housing stock within the county.

When conducting reviews, housing associations should consider the current circumstances of the household including the financial capability of the tenant to secure alternative market accommodation or other affordable tenures, in terms of earned income and the need of the household for the property type and size.

7. Affordable Rents

The council recognises that many new fixed term tenancies for social housing are at affordable rather than social rents. It will monitor the extent to which affordable rents are actually affordable to those in housing need, particularly in the light of national welfare reforms. In some cases or geographic areas the Council will encourage the letting of social homes at social rents.

Social Rent – rents in line with guideline target rents which are determined through the national rent regime.

Affordable Rent – the housing provided will have the same characteristics as social rented housing except that it is outside the national rent regime, but is subject to other rent controls that require it to be offered to eligible households at a rent of up to 80% of local market rents.

8. Governance Arrangements

Housing associations in Herefordshire are required to have regard to the principles set out in this policy and work within the Localism Act 2011, when developing their organisations tenancy policies and when granting and terminating tenancies.

The implementation of the tenancy strategy will be monitored through the Housing Partnership Sub Group (Housing Practice).

The tenancy strategy will be reviewed on an annual basis and considered alongside the potential impact of planned welfare reforms.

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**Incomplete early draft Strategy, which is subject
to further revision prior to consideration by
Management Board and Cabinet**

HEREFORDSHIRE COUNCIL INTERIM HOUSING STRATEGY

2016-2020

v.3.1



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1. Introduction

Herefordshire council faces a diversity of challenges in its role as a strategic housing authority. In common with other councils across the country, it no longer holds its own housing stock and its resources and direct control over social housing provision has been substantially reduced over the years.

However, the council still retains significant responsibilities in relation to:

- Affordable housing development.
- Prevention and relief of homelessness.
- Housing conditions and enforcement in the private rented and owner-occupied sectors.
- Assistance to sustain healthy independent living through promoting safe, appropriate housing and affordable warmth.
- Provision of specialist housing with care.
- Policy for the allocation of social/affordable rented housing in the county.

Herefordshire Council's Housing Strategy 2016-2020, is an overarching document. It connects to a number of other housing related strategic documents and plans that, taken together, provide the framework through which our housing and housing related priorities will be achieved.

The Strategy has been developed against the backdrop of national austerity and substantial local budgetary constraint, the uncertain impact of radical reforms to housing and social welfare policy and increasing pressures on local services.

For context, since 2011, the council has saved £49 million. From now until 2020, it will need to save an estimated additional £42 million. The impact of this for Herefordshire, as for councils nationally, is that it no longer has the resources to pay for all the services that have traditionally been provided. Inevitably, difficult decisions will have to be made about how housing responsibilities are prioritised and delivered and an even greater emphasis placed on joint working across inter-related parts of the council and with our external statutory and voluntary sector strategic partners.

The Housing Strategy contributes towards the Council's wider strategic aims and priorities, which are to:

- Keep children and young people safe and give them a great start in life.
- Enable residents to live safe, healthy and independent lives.
- Invest in projects to improve roads, create jobs and build more homes.

In fulfilling its strategic housing responsibilities, the council works in partnership with;

- Property developers, including housing associations.
- Housing associations / Registered Providers of local social and affordable housing.
- Voluntary sector and statutory agencies in preventing or relieving homelessness.
- Neighbouring local authorities, specifically Shropshire, Telford and Wrekin and District Housing Authorities in Worcestershire.

There are also partnerships within Herefordshire council, between teams responsible for Housing Strategy and Development, Planning, Environmental Health, Corporate Finance and Adults Wellbeing Operations.

2. Housing priorities and themes

Housing of the right type, in the right place which is comfortable, safe, affordable and appropriate to needs is intrinsic to emotional and physical wellbeing. The Strategy has three overarching priorities which reflect this, supported by a number of housing themes:

Priority 1: Improving Housing Supply and Access to Housing

- Ensure a programme of affordable housing development, consistent with local housing need and national and local targets.
- Establish new models of partnership with housing developers, which deliver optimum benefit from the council's resources.
 - Deliver new models of investment including private rented and new-build, custom and self-build homes.
 - Establish new ways of development using council land, including support for privately rented new builds, self-build and custom build homes
- Ensure that the social housing Allocations Policy meets statutory obligations, is fair and realistic in the context of the exclusions policies of Home Point partners.
- Enable the local housing sector to operate economically and optimise take up of social housing.

Priority 2: Improving Housing Support

- Ensure development of sufficient market rent and affordable housing and appropriate housing with care to meet the future needs of older people.
- Use an evidence based approach to delivering diverse, appropriate specialist housing, with care options, for disabled people, people with mental health needs and vulnerable young people, including those leaving care.
- Prevent homelessness happening whenever it is possible to do so and, where this has not been possible, prevent it happening again.
- Enable appropriate and enduring housing solutions for those homeless people who often face the greatest barriers in accessing and sustaining a stable home, including rough sleepers, young people, people with substance dependencies or mental health issues, people with challenging behaviours and people who are socially marginalised.

Priority 3: Improving Housing Quality

- Enable improved quality and safety of private sector accommodation.
- Ensure that the links between health and housing are recognised across the council.

3. Strategic Links

This Strategy does not exist in isolation. It provides an overarching framework for housing and housing related activity within the county. It also has important links with other Herefordshire Council strategic documents and plans including:

- Older People's Housing Strategy and Pathway.
- Homelessness Review 2016-2020 and Homelessness Prevention Strategy 2016-2020.
- Herefordshire Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2015.
- Learning Disabilities' Commissioning Plan 2015.
- Herefordshire Autism Strategy 2014-2017.
- Domestic Abuse Needs Assessment 2013.
- Mental Health Integrated Needs Assessment 2015.

- Looked After Children and Complex Needs Assessment 2014-2019.
- Health and Wellbeing Strategy 2015.

The Strategy takes account of the significant changes, which have affected housing at the national, regional and local level and draws on a number of evidence sources, including the following:

- Understanding Herefordshire: An Integrated Needs Assessment 2015.
- Herefordshire Core Strategy 2011-2031.
- Local Market Housing Assessment, update 2014
- Herefordshire Affordable Warmth Strategy 2015-2018
- Healthy Housing Report 2012

Whilst there is an existing evidence base to inform the strategic priorities and intended direction of the core elements of the strategy, it is probable that the unfolding impact of national government housing, planning and social welfare policy will require a flexible response that looks to incorporate any new opportunities for effective and focused joint working with partners, which may arise.

4. National Policy Context¹

The Strategy builds on the work of the previous Herefordshire and Shropshire Joint Housing Strategy 2012-2015. However, the legislative and commercial context in which the housing market operates has changed substantially and government reforms are affecting every aspect of housing within Herefordshire.

Fundamental change in recent national housing policy has included:

- Reforms to how social housing is provided and allocated.
- Changes in entitlement to Housing Benefit and the introduction of Universal Credit.
- Abolition of regional planning structures with an emphasis on local decision making.

¹ It is important to note that the information contained below was correct at the time of writing, but as supplementary announcements from central government on housing and social welfare policy continue there may be some change.

- The introduction of the National Planning Policy Framework (NPPF), which raises the threshold under which affordable housing is required to be delivered.
- Changes in the way that health and social care is commissioned through the Health and Social Care Act 2012.
- Government pledge to extend the Right to Buy to housing association tenants.

4.1 Localism Act 2011

The Localism Act 2011 introduced very significant changes to housing policy and planning in what the government described in, 'Laying the Foundations, A Housing Strategy for England, November 2011 as a 'radical programme of reform of social housing.'

Key reforms relating to housing and planning include:

- Social housing reform: This gives individual social housing providers new powers to grant tenancies for a specified fixed-term, where they choose to do so, rather than a 'life-time' tenancy.
- Allocation reform: This gives local authorities greater control over who is entitled to register for social housing.
- Reform of homelessness legislation: This gives local authorities powers to discharge their housing obligations to homeless people through the private rented sector on a minimum one-year Assured Shorthold Tenancy.
- National Planning Policy Framework (NPPF) 2012: This establishes a presumption in favour of sustainable development, the introduction of Neighbourhood Plans and the abolition of Regional Spatial Strategies.

4.2 Welfare Reform ACT 2012

The Welfare Reform Act 2012 contained important changes to benefit entitlement, each of which is intended to reduce the overall cost to the Treasury. These include:

- The introduction of Universal Credit, which merges a number of different benefit entitlements, including Housing Benefit and Job Seekers Allowance, into a single monthly payment. There is a benefit cap that limits the amount of benefit a household is entitled to receive.
- Universal Credit is being rolled out in Herefordshire from March 2015 for single persons, who would have been eligible for Job Seekers Allowance. It remains to be seen if this will impact negatively on access to the private

rented sector through, for example, any reluctance by landlords/lettings agencies to offer tenancies to claimants on Universal Credit.

- From April 2013 new rules were introduced to restrict the amount of Housing Benefit working-age council or housing association tenants could claim if they were deemed to be under-occupying their home. For one spare bedroom, Housing Benefit entitlement was reduced by 14% per week and for two or more bedrooms by 25%.
- In October 2012 a new harsher sanctions regime for Job Seekers Allowance was introduced by the Welfare Reform Act. This set out three levels of fixed periods of sanction for failure to undertake agreed work search activity, ranging from four weeks up to a maximum of three years for repeated failures. Some research² has indicated that sanctions are having a disproportionate impact on vulnerable groups, including homeless people, single parents and disabled people.

4.3 Affordable Rent Regime:

The concept of 'Affordable Rent' was introduced as part of the Homes and Communities Agency's (HCA) Affordable Housing Programme (AHP) 2011-2015. This form of tenure, where providers can charge up to 80% of the market rent, essentially shifts the balance between grant support and rental income as the means of financing new development. The model permits housing associations to convert vacant Social Rent properties to Affordable Rent when they are re-let, but only where a delivery agreement for a new supply of social housing has been agreed with the HCA.

4.4 Summer Budget July 2015: Key measures relating to Housing and Welfare

The Budget announced around £17 billion of spending cuts, including £12 billion by 2019-2020 from welfare reforms. The main reductions are as follows:

- From April 2017, the overall benefit cap, currently set at £500 per week (£26k per year) for a working age household with children, will be reduced to £385 (£20k per year) or £442 (£23k per year) in London.
- Housing Benefit will be frozen for four years from April 2016, along with both Child and Working Tax Credits and a number of other working age benefits, including Jobseekers' Allowance, Employment and Support Allowance, Income Support and Child Benefit.

² The Homelessness Monitor, Crisis and JRF, February 2015

- From April 2017 parents claiming Universal Credit, including lone parents, will be expected to prepare for work when their youngest child is two and to look for work when they are three.

Removal of Housing Benefit entitlement for 18-21 year olds

- From April 2017, 18-21 year olds submitting a new claim for Universal Credit will not be automatically entitled to receive the housing costs element (the equivalent of Housing Benefit). There will be exceptions for:
 - Those who are parents and whose children live with them.
 - Vulnerable groups.
 - Those who had previously been living independently and working continuously for 6 months.
- 18 -21 year olds receiving Universal Credit will also be subject to a new youth obligation. They will be expected to participate in a programme of support at the start of their claim and to apply for an apprenticeship or traineeship, gain work place skills or go on a work placement after six months.

Following these announcements, the Chief Executive of Crisis claimed that more young people were likely to become homeless as a result of the proposed cuts.

“Under-25s already make up a third of homeless people and there is a real danger these changes could make things even worse. For many young people, living with their parents simply isn’t an option.”³

Social Housing Rents

- From April 2016, government will require all social landlords to reduce their rents by 1% every year for the next four years (rather than increasing them by Consumer Price Index (CPI) +1%, as previously identified). This will be taken forward via the Welfare Reform and Work Bill and will apply to both social and affordable rents.
- Tenants in social housing who earn more than £30,000 per year (outside London), will be expected to pay market or near market rents. This was subsequently withdrawn and replaced by a voluntary system for housing association providers, whilst being retained for council tenants.

The National Housing Federation (NHF)⁴ has responded to the announcements in the Summer Budget as follows:

³ Jon Sparks, Chief Executive, Crisis, July 2015

⁴ National Housing Federation Briefing Paper: Summer Budget 2015, July 2015

- Whilst a cut in rents over the next four years will be a real help to some tenants, the reduction in rental income will impact on housing associations ability to plan for and invest in new housing development. An initial estimate suggests that at least 27,000 new affordable homes will not be built as a result of this loss.
- Modelling indicates that the reduction in the benefit cap could affect 205,000 households including 68,000 households living in housing association properties. The lower cap will impact on affordability in all areas of the country and a lower benefit cap outside London takes no account of regional variations in rents. Initial analysis indicates that, for a couple with three children, the weekly shortfall for a three-bedroom property is likely to be in the region of £44.34 using average rent data.
- Whilst there are plans for a national living wage for over 25s (set at £7.20 per hour from 2016 and rising to £9.00 per hour by 2020) estimates in the Institute for Fiscal Studies post-budget briefing paper⁵ indicate that this will not provide full compensation for the majority of losses that are likely to be experienced overall.

4.5 Autumn Statement and Comprehensive Spending Review

In November 2015, the Chancellor of the Exchequer presented his Autumn Statement for 2015 and the Comprehensive Spending Review covering the period up to the 2020 General Election.

Main announcements affecting housing include the following:

- Funding for new affordable homes will be doubled, but will be refocused so that most of the funding will be spent supporting new homes for low cost home ownership, rather than to rent.
 - Whilst additional spending on housing is to be welcomed, focussing government support only on home ownership will not help those in housing need who are not able to save a deposit or get a mortgage. This will include a substantial number of families and single people and families in need in Herefordshire.
 - Information in the 'Understanding Herefordshire Report,' 2015 confirms that the county is still one of the worst areas within the West Midlands region for housing affordability, where house prices at the lower end of the housing market cost around 8.1 times the annual earnings of the lowest earners.

⁵ Paul Johnson, Institute for Fiscal Studies, July 2015

- The cuts to working tax credits announced as part of the summer budget will not now be implemented. However cuts to child tax credits will still go ahead as planned.
- There will be changes to the way the management of temporary accommodation is funded. The management fee currently paid by the Department for Work and Pensions to local authorities on a per household basis will end from 2017-2018 and instead an up front fund will be established.
- Housing benefit in the social housing sector will be capped at local housing allowance rates for new tenants. This includes extending the shared room rate, whereby single people under 35 are only eligible for enough support to cover the cost of a room in a shared house. The change will apply to tenancies starting from April 2016 and will take effect from 2018.
- As at December 2015, the Department for Work and Pensions (DWP) has clarified that it does intend to apply the cap to housing benefit for tenants in supported and sheltered housing, but that it will seek to protect people as far as possible through the local system of Discretionary Housing Payments.
- Capping housing benefit for new tenants in the social housing sector to Local Housing Allowance (LHA) rates could also have a major impact on households. At the time of writing further information on how this will be applied is awaited. However, in December 2015 Davie Orr, Chief Executive of the National Housing Federation (NHF) wrote to the Minister of State for Housing and Planning expressing concern that this would have a 'catastrophic' impact on, in particular, supported housing providers, as follows:

'The impact of the LHA on the amount of Housing Benefit payable for supported housing will make it extremely difficult for any housing association to develop new supported housing. Without existing levels of benefit being available, providers across the country will be forced to close schemes.'

5. Housing and Planning Bill 2015

Extending the Right to Buy to housing association tenants:

The government's proposed Housing and Planning Bill will:

- Extend the Right to Buy to housing association tenants, offering discounts worth up to £102,700 in London and £77,000 in the rest of England, but not in Scotland or Wales, where Right to Buy is being abolished.
- There are around 2.5 million housing association tenants. Whilst they already have the Right to Acquire, the discounts are much less generous, ranging from £9,000 to £16,000 depending on location. In addition, the Right to Acquire is currently not available in rural areas where there are fewer than 3,000 properties.
- To fund the policy the Housing and Planning Bill will require stock-owning councils to sell 5% of their most valuable housing properties when they become vacant and replace them with cheaper homes. Cash from the sale proceeds will be used to create a £1bn Brownfield Regeneration Fund.
- The government has made a commitment to ensure there would be 'one-for-one' replacement for all the properties sold under extended RTB. However, figures released by the Department for Communities and Local Government (DCLG), June 2015, show that 12,304 homes were sold under the Right to Buy in England in 2014-2015, whilst only 1,903 homes were started or acquired to replace them.
- Locally, it is possible that there could be a loss of social and affordable rented housing association properties but at present there are too many variables to allow any valid predictive analysis.

5.1 National Planning Policy:

National planning policy requires local planning authorities to plan proactively to meet all housing needs in the area, including market and affordable housing. The current definition of affordable housing⁶ includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market.

⁶ As at January 2016

Starter Homes:

The Housing and Planning Bill contains measures to deliver an extra 200,000 new homes through the new Starter Homes initiative, which will offer a 20% discount to first-time buyers under 40 years of age. It introduces a statutory duty on local authorities to promote the delivery of starter homes, and a requirement for a proportion of starter homes to be delivered on all suitable reasonably-sized housing developments.

The Bill defines starter homes as new dwellings for first time buyers under 40, sold at a discount of at least 20% of market value and at less than the price cap of £250,000.

The Bill puts a general duty on all planning authorities to promote the supply of Starter Homes, and provides a specific duty to require a certain number or proportion of Starter Homes on site.

It was originally stated that Starter Homes will be built predominantly on brownfield sites that were not previously identified for housing development. However, at the Conservative Party Conference in October 2015, the Prime Minister announced that developers will be permitted to provide Starter Homes, instead of traditional affordable housing, on private sites to satisfy Section 106 planning requirements. These homes will be sold directly by the developer, with no need for housing association involvement.

Self-build and custom housebuilding:

The Bill adds to and amends the Self-build and Custom Housebuilding Act 2015, which requires local authorities to keep a register of people seeking to acquire land to build or commission their own home.

Section 106 contributions:

Section 106 contributions, sometimes known as 'planning obligations' or 'planning gain,' stem from agreements made under section 106 of the Town and Country Planning Act 1990. They are agreements made between the developer and the Local Planning Authority (LPA) to meet concerns about the costs of providing new infrastructure or affordable housing levels.

Community Infrastructure Levy:

In November 2015 the Government announced that an independent group would be set up to conduct a review of the Community Infrastructure Levy (CIL), with the remit of:

- Assessing the extent to which CIL does or can provide an effective mechanism for funding infrastructure

- Recommending changes that would improve its operation in support of the Government's wider housing and growth objectives.

DCLG Consultation on proposed changes to the National Planning Policy December 2015:

In December 2015, the DCLG issued a consultation document seeking views on some specific changes to national planning policy, as follows:

- Broadening the definition of affordable housing, to expand the range of low cost housing opportunities for those aspiring to home ownership.
- Increasing the density of development around commuter hubs, to make more efficient use of land in suitable locations.
- Supporting sustainable new settlements, development on brownfield land and small sites, and delivery of housing allocated in plans.
- Supporting delivery of starter homes.

Introduction of Fixed-Term Tenancies:

- A government amendment, introduced at the Committee Stage of the Housing and Planning Bill, proposes the use of mandatory fixed-term tenancies of between two and five years. Although the amendment relates specifically to council tenants, it is likely that the government will introduce similar measures for housing association tenants through regulatory change.
- Whilst not originally part of the Housing and Planning Bill, a government announcement in early January 2016, stated its intention to directly commission the building of up to 13,000 new starter homes, defined as above, on public land. The pilot scheme will start on five sites in north-west London, Dover, Cambridgeshire, Chichester and Gosport.

6. Key achievements since the 2012-15 Herefordshire and Shropshire Joint Strategy

As at 31st March 2015, 400 new affordable homes had been delivered since the start of the Joint Strategy in 2012.

- The target of 140 affordable homes for the 2014-2015 financial year has been exceeded.
- 34 units of accommodation have been delivered in rural areas for local people in housing need through Community Led Development Funding.

- £2 million has been secured through the 2015-2018 HCA Bid Round to develop affordable housing across Herefordshire.
- A major regeneration project in a deprived area of Hereford City has been supported, which included the development of 259 new sustainable homes; 130 of which are affordable rent properties and 129 are for home ownership.
- An Older People's Housing Strategy and Pathway has been published, following a major research project, which identified older people's housing need across the county up until 2031. The document provides clear guidance on the housing and other related services that the council wishes to develop, in partnership with a range of other organisations, to address the housing and service challenges of our ageing population.
- An assessment of the accommodation needs of Gypsies, Travellers and Showpeople has been completed and current and projected permanent, transit and other accommodation needs identified.
- 171 empty properties were brought back into use in 2013-2014, of which 55 were classed as 'long-term empty.'
- Herefordshire was one of five innovation areas in England selected for the delivery of the Department of Health (DoH) Homeless Link project, which aimed to improve outcomes for homeless people with mental health and substance misuse needs. An audit report, which identifies the findings from the project, has been published.
- B&B has not been used as emergency temporary accommodation for homeless families and other adult households since 2012.
- Herefordshire Healthy Housing Survey completed and report published October 2012.
- Adoption of the regional Midland Landlord Accreditation Scheme in April 2014.

7. Herefordshire Housing Market and Key Challenges

Housing is a fundamental requirement for good health and wellbeing. Inequalities in a range of health issues can often be tracked to the quality of housing or its absence.

Unless otherwise stated, the following information is taken from 'Understanding Herefordshire' 2015. The report provides strategic intelligence for commissioning and business planning for the whole county.

- Within the West Midlands region, Herefordshire is ranked as the third most expensive unitary or shire authority when median rents for all dwelling sizes are compared.
- The difficulties in acquiring housing are compounded by having one of the worst affordability levels within the West Midlands region; with houses at the lower end of the market costing around 8.1 times the annual earnings of the lowest earners. This puts greater pressure on the affordable housing options that are available across the county and, given a high demand against limited supply, there is a substantial shortfall.
- Research published by the Halifax Building Society in November 2014, concludes that rural house prices across Great Britain are 26% higher than in urban areas. Whilst the rural premium exists across all regions it is greatest in the West Midlands at 57%. This puts rural owner-occupation out of the reach of many, particularly young first-time buyers.
- The Local Housing Market Assessment (LHMA) published November 2013⁷ identified that, to balance the housing market over the longer term (2011-31), an average of 35% of new homes built would be a viable level of affordable housing. The report recommended a range of tenures to cater for the breadth of housing needs and circumstances, particularly for people who can afford to pay more than social rents, but have insufficient resources to access the market.
- Flood risk is a key issue and in some areas a significant constraint to new development.
- The Herefordshire Local Housing Requirements Update, September 2014,⁸ states that the private-rented sector is likely to continue to be used for the foreseeable future by households who cannot acquire a social rented home, given the existing shortfall. Whilst not identified in the study there is however, some circumstantial evidence to suggest that there may be barriers to accessing the private-rented sector for low-income and other households and this needs to be investigated more rigorously.
- Through 2001-2011, the number of over-crowded properties increased by 34% and the number of people living in houses in multiple occupation

⁷ G L Hearn

⁸ GL Hearn

(HMOs) grew by 44%. This is above the levels seen in Shropshire as well as regional and national averages, indicating that the situation in Herefordshire is more acute than elsewhere.⁹

- The last decade has seen a large increase in the number of concealed families, i.e. those that live in a household containing more than one family (including grown-up children who have a spouse, partner or child living in the household; elderly parents living with their family; or unrelated families sharing a home).
- In 2011 there were almost 850 concealed families, an increase of 87% on 2001 compared with 70% nationally. This increase could be related to:
 - A combination of the affordability of housing and the availability of finance since the credit crunch.
 - There may also be some connection to increased migration following the expansion of the European Union. The 2011 Census shows that a relatively large proportion of people in the white non-British ethnic group live in some form of shared housing.
- The 'heads' of just over half of the concealed families were aged under 34, mostly either lone parents with dependent children or couples with no children.
- Fuel poverty is a significant challenge in Herefordshire. Department of Energy and Climate Change (DECC) figures indicate that there were c11,000 fuel poor households across Herefordshire in 2013. This equates to 14.1% of all households, placing Herefordshire amongst the worst 10% of English Local Authorities in terms of fuel poverty levels. Fuel poverty has been identified as a significant health and wellbeing challenge and features in two of the seven priorities identified in Herefordshire's Health & Wellbeing Strategy.
- The Herefordshire Healthy Housing Report 2012, confirmed that Herefordshire, as a large rural County, faces exceptional challenges in relation to the age and type of housing, the availability of mains gas, and the population profile.
- Weekly and annually work based earnings are low in Herefordshire compared to those regionally and nationally and comparator areas.
- A relatively large proportion of employment is in low paid sectors such as wholesale and retail and agriculture, which affects the overall productivity of the county.

⁹ GL Hearn, as above

- Herefordshire has the 4th lowest overall population density in England with a population scattered across the 842 square miles of the county.
- 25% of the population live in areas classified as 'very sparse,' which is higher than any other county.
- Rural households have additional costs associated with transport and heating the home, which for residents of villages are estimated to be 25% higher for pensioner household and at least 10% higher for the population as a whole.
- Almost all the county's 842 square miles fall within the 25% most deprived in England in terms of geographical barriers to services.
- Some areas of South Hereford, Leominster and Ross-on-Wye are amongst the 25% most deprived in England and have become more deprived relative to other areas.
- People using secondary mental health services have an employment rate which is 66 percentage points lower than that the population as a whole.
- People with learning disabilities have an employment rate which is 59 percentage points lower than that the population as a whole.

7.1 General Housing Needs

The National Planning Policy Framework (NPPF), Department of Communities and Local Government (DCLG) March 2012 and Planning Practice Guidance on Housing and Economic Development Needs Assessments (DCLG, March 2014), sets out how the Objectively Assessed Need for housing is expected to be identified and other factors, which are relevant in translating this into policy targets for housing provision in local plans.

The Herefordshire Local Plan – Core Strategy 2011-31 set out the overall strategic direction of land use for housing development and economic growth, taking into account environmental protection, transport and other infrastructure needs. Its latest version, published May 2014, demonstrates a need for a total of 16,500 new homes over the plan period, as follows:

- Hereford City 6,500
- Market Towns 4,700
- Rural Villages 5,300

Of the above, the identified need is for the delivery of, in the region of, 4,800 affordable homes over the Core Strategy period. For the purpose of delivering affordable housing across Herefordshire, the council considers affordable housing for local people to be:

‘Housing provided at below market price and allocated on the basis of need to people who live or work in Herefordshire, or need to move to Herefordshire to receive/provide support and who are unable to purchase or rent houses generally available on the open market without financial assistance, as their only home.’

Social Rented: Rented housing, usually owned and managed by housing associations, for which guideline target rents are determined through the HCA national rent regime.

Affordable Rented: Rented housing, usually owned and managed by housing associations, with rents set at up to 80% of the open market rent.

Intermediate: Homes for purchase and rent provided at a cost above social rent, but below market levels. They can include homes for Shared Ownership, Low Cost Market and Intermediate Rental.

The Herefordshire estimated target for affordable development over the next five years is in the region of 1,500 affordable homes located in urban and rural areas. However, In November 2014 a Written Statement by the Minister of State for Housing and Planning established that no affordable housing or other tariff-based infrastructure contributions could be required on residential development proposals of 10 dwellings or less and a maximum combined floor space of no more than 1,000 square meters, except in areas of outstanding natural beauty or on rural exemption sites. This development threshold is a mandatory requirement through restrictions to the Section 106 process, with immediate effect.

In the Rural Housing Policy Review Group report, ‘A fair deal for rural communities, February 2015, it was suggested that this would have a substantial detrimental impact on councils’ ability to negotiated affordable housing development in rural areas.

Following a Judicial Review of the planning amendment, brought by two local authorities, these policy changes were quashed by the High Court in July 2015.

7.2 First Time Buyers

GL Hearn, 2014 states that the tight lending criteria initiated by the ‘credit crunch’ has continued to have an impact on mortgage lending over the last four years, with households’ ability to obtain mortgage finance functioning as a constraint on demand for market homes. This has led to substantial difficulties for first-time buyers trying to access home ownership. Whilst the council is constrained in the extent to which it can influence the market, where there is an identified need,

intermediate housing such as low cost market and shared-ownership is secured through planning processes.

The extent to which the government's 'Starter Homes' initiative will improve opportunity for first time buyers in Herefordshire remains to be seen. Concerns remain that, even at a discount of 20% below market value, home ownership will still remain out of reach of many of Herefordshire's under 40 year olds who aspire to home ownership.

7.3 Older People's Housing

Herefordshire's population already has a relatively old age structure with 22% of people aged 65+ compared to 17% nationally. Population projections indicate that by 2031 almost a third of the county's population will be aged 65+ and the number of people aged 85 or over will have doubled.

Many older people in Herefordshire are active and healthy and through the provision of informal care to family and friends, and through volunteering activities, provide a significant contribution to the sustainability of their communities. There are however, significant longer-term implications for the provision of care and support as the proportions of very elderly people in the population increase.

To compound this issue residents who are aged 65-84, are more likely to live in rural villages and dispersed areas than the population as whole (49% of people aged 65-84 compared to 43% of all Herefordshire residents). The impact of significant cuts to budgets also has to be considered alongside the pre-existing challenges arising from demography and rurality.

Herefordshire's Older People's Housing Strategy and Pathway 2015, builds on the major research undertaken by Peter Fletcher Associates (PFA) and Arc4 2012, updated January 2015. The research highlights that:

- 80% of older people are able to purchase a property outright or with a mortgage and would prefer to purchase rather than rent. For general needs older peoples' housing development and/or remodelling there should be an average mix of 80% sale/20% rent, depending on the local market.
- There is a major shortage in the county of housing which is desirable, appropriate to needs and aspirations and presents an attractive option for older owner-occupiers wishing to move from larger family homes.
- There is equity in the older persons' market and the potential to use new housing development as a stimulant to rebalance a housing market that currently lacks sufficient choice and diversity.

The Older People's Housing Strategy and Pathway provides detailed analysis of the profile of general and specialist need for older people's housing in each of Herefordshire's seven local Housing Market Areas. This analysis is not, therefore replicated here.

7.4 Younger People aged 18-34 years

Access to suitable affordable housing in Herefordshire is a major challenge for young people in the current economic climate, particularly in the county's rural areas where there may be very limited availability of suitable accommodation.

Home ownership is out of the reach for the majority of young people, whilst social housing is inaccessible to all but the most vulnerable households and potentially, there are also barriers to accessing the private-rented sector in Herefordshire.

A report from the Institute for Public Policy Research¹⁰ claims that nationally the inaccessibility of both home ownership and social housing for young people has meant that many are living in private rented accommodation, or with their parents or in shared housing.

In Herefordshire, whilst the data is not age specific, GL Hearn's analysis shows an overall reduction in home ownership and a growth in the private rented sector in Herefordshire between 2001 and 2011. This information does not however, identify significant, but elusive factors such as; the type of household accessing the sector, the average length of stay, the type and quality of the accommodation and if there are pre-existing barriers to access such as age and entitlement to housing benefit. Anecdotally the latter is considered to be the case for younger people and this needs further investigation.

From 1st January 2012 housing benefit entitlement for young people, aged 34 years and under and renting in the private sector was restricted to the rent payable for one room in shared accommodation (SAR), with some specific exemptions.

Contributory evidence to the Work and Pensions 2014 report Work and Pensions Report,¹¹ suggested that the SAR has led to young people getting into debt in accommodation that they can no longer afford and to increased 'sofa surfing' hidden homelessness where affordable accommodation cannot be accessed or unaffordable accommodation has been moved out of.

That homelessness and threatened homelessness is an issue for young people in Herefordshire is confirmed by data contained in the Homelessness Review 2016-2020.

¹⁰ No Place to call Home, December 2012

¹¹ Support for housing costs in the reformed welfare system, March 2014

7.5 Learning Disabled People

Learning disabled people have poorer health than the general population, much of which is avoidable. These health inequalities often start early in life and are serious.

In general, learning disabled people die at a younger age than their non-disabled peers. Research has found that on average men die 13 years younger than men in the general population, whilst women die on average some 20 years younger than women in the general population.¹²

In Herefordshire, our aim is to ensure that the health, housing and support needs of learning disabled people are effectively met and that they have choice and control over their lives so they can live as independently as possible. In order to help us achieve this we are currently in the process of identifying a number of different housing models, which will be designed to meet needs and aspirations for supported and independent living.

'Building the Right Support,' October 2015 is a national plan to develop community services and close inpatient facilities for learning disabled and/or autistic people who display behaviour that challenges, including those with a mental health condition. The document states that, whilst the numbers living in institutional care settings has significantly reduced in recent years, there is still an over reliance on this type of care.

The national plan has been built on the recognition that learning disabled and/or autistic people have the right to the same opportunities as anyone else to live satisfying and valued lives and to be treated with dignity and respect. They should expect, as non learning disabled/autistic people, to live in their own homes, to develop and maintain positive relationships and to get the support they need to be healthy, safe and an active part of society.

In order to speed up and shape the national approach, six 'fast track' areas including Herefordshire and Worcestershire, have drawn up plans to transfer resources away from institutional to community settings. Further information on the Herefordshire and Worcestershire approach is detailed in the body of the 'Building the Right Support,' report.

In 2013-2014, 540 people with learning disabilities, between the ages of 18-64 years, were known to social services in Herefordshire.¹³ Accommodation and employment data is shown below.

¹² Confidential Inquiry into the Premature Death of People with Learning Disabilities, Heslop et al, 2013

¹³ Public Health England Community Mental Health Profiles 2013-14

	Herefordshire	England	WestMids	Similar L/As
Living in settled accommodation	77.0%	74.9%	68.9%	75.4%
In employment	4.5%	6.7%	4.9%	7.2%

7.6 People with Autism

Autism is the name given to a spectrum of conditions that have a lifelong impact on people. The term broadly describes differences and impairments in social interaction and communication, combined with rigid and repetitive behaviours.

There is little certainty in data on the local numbers of adults with Autism. The National Autistic Society estimates on prevalence in the UK population as a whole would suggest that in Herefordshire there are likely to be approximately 2,000 with some form of Autism.

In December 2014 Herefordshire Council submitted a self-assessment to Public Health England on how well it was doing in meeting the requirements of the National Autism Strategy. One of the key findings from the self-assessment was the pressing need to improve housing provision and opportunities for people with autism in the county

7.7 Looked After Children 16+ population

Herefordshire's overarching vision for looked after children and those with complex needs is the same as for all of Herefordshire's children and young people – that we keep them safe and give them a great start in life.

The 16+ population includes young people who:

- Have been looked after by the local authority and have reached 16-21 years of age.
- Are homeless 16-17 year olds or are at risk of homelessness.
- Have been remanded into the care of the local authority by the Court.
- Are a risk to themselves or others, with history of offending, mental health issues or drug and alcohol misuse.

The Looked After Children and Complex Needs Placements: Commissioning & Sufficiency Strategy 2014–2019, forms part of Herefordshire's overall approach to commissioning services for children, young people and families and represents a key priority area. The strategy recognises that:

- There are gaps in provision for care leavers who are 18 years or over and have left care.

- Further work is necessary to develop an understanding of the housing and support needs of these young people so that appropriate services can be commissioned.

For homeless 16 and 17 year olds housing options, which provide security and safety are usually very limited. With restricted access to welfare benefits, requirements for rent in advance and bond payments and tenancy law issues, very few reputable private sector landlords are willing to offer a tenancy.

This is why it is so important that local authorities have protocols in place that clearly identify respective responsibilities under the Children Act 1989 and the Housing Act 1996 and how statutory duties will be fulfilled.

However, Research published by the Law Centres Network concluded that some local authority protocols for dealing with homeless 16 and 17 year olds did not comply with the law, resulting in homeless young people failing to receive the support they are entitled to.

7.8 Mental Health

The Department of Health (DoH) 'No Health without Mental Health Implementation Framework,' July 2012 states that at least one in four people will experience a mental health problem at some point in their lives and that more than £2 billion is spent annually on social care for people with mental health problems.

In 2013-2014, Herefordshire Clinical Commissioning Group allocated £15.3 million to its contract with the current provider of secondary and community mental health services.¹⁴ A safe and secure place to live is essential for emotional and physical health and wellbeing. For many people however, poor mental health is linked to insecure, poor quality and overcrowded housing and homelessness.

The Mental Health Implementation Framework acknowledges that housing service commissioners and providers have a key role in improving mental health outcomes, providing both settled housing and the services people need to maintain their homes as independently as possible and in providing specialist support.

There is also recognition that good use of Health and Wellbeing Boards needs to be made to ensure effective alignment of joint resources across Clinical

¹⁴ Mental Health Needs Assessment, HCCG, March 2015

Commissioning Groups (CCGs) and local authority housing and social care commissioners.¹⁵

Adult Social Care outcomes show the following information 2013-2014 (Health and Social Care Information Centre).

	Herefordshire	England	WestMids	Similar L/As
Living in settled accommodation	50.5%	60.8%	72.2%	59.3%
In employment	7.1%	7.0%	10.4%	8.9%

The measures are for those on the Care Programme Approach only and so may not include all of those in contact with secondary mental health services. They do, however, show that, for both indicators for 2013-2014 Herefordshire, averages were below those for the West Midlands, similar local authorities and England as a whole.

In order to increase availability of affordable settled accommodation, we are currently in the process of identifying a number of different housing models, which will be designed to meet needs and aspirations for supported and independent living.

In addition, some people with mental health problems will require a stay in hospital and the integration of housing with discharge planning is critical if delayed discharges are to be avoided.

7.9 Gypsies and Travellers

Various research has shown that Gypsies and Travellers are one of the most disadvantaged and socially excluded groups in the country. Often their life experience is one of considerable prejudice and discrimination and they are particularly susceptible to a range of inequalities relating to health, education and quality of accommodation.

There are significant health inequalities particularly around infant and maternal mortality and life expectancy, which is 10-12 years below that of the settled population.

In order to assess needs in Herefordshire, the research consultants Arc4 were commissioned. The results were published in the 'Herefordshire Gypsy and

¹⁵ Housing and Mental Health, Mental Health Network, December 2011

Traveller and Travelling Showperson Accommodation Assessment,' January 2015.

8. Health and Housing

8.1 Health and Social Care Act 2012

Local authorities' statutory responsibilities for public health services are set out in the Health and Social Care Act 2012.

The Act introduced substantial changes to the way that the NHS in England is organised. At the local level, Upper tier and unitary authorities took on new responsibilities to improve the health of their populations, backed by a ring-fenced grant and a specialist public health team, led by the director of public health.

Section 12 of the Act lists some of the steps to improve public health that local authorities and the Secretary of State are able to take, including:

- Providing assistance to help individuals minimise risks to health arising from their accommodation or environment, including improving poor housing where this impacts on health.

8.2 Care Act 2014

The Care Act 2014 is a landmark piece of legislation, which places a fundamental emphasis on prevention and the implementation of a system which intervenes early to prevent, reduce or delay the need for care and support.

The Act recognises housing authorities and housing providers as critical partners in the promotion of healthy independence and emotional wellbeing, making it clear that housing is a health-related service. In addition, the HCA acknowledges the positive relationship between good mental health and good housing and that it is core to social inclusion and recovery from mental illness.¹⁶

Specifically, Section 195 of the Act imposes a duty on Health and Wellbeing Boards (HWB) to encourage integrated working between commissioners of NHS, public health and social care services for the advancement of the health and wellbeing of the local population. A Health and Wellbeing Board must provide advice, assistance or other support in order to encourage partnership arrangements such as the developing of agreements to pool budgets or make lead commissioning arrangements under section 75 of the NHS Act.

¹⁶ Care and Support Specialised Housing Fund, HCA, February 2015.

There is an impressive and growing evidence base that shows housing related services can improve outcomes and reduce costs for the health services and other areas of public expenditure. Delivering services in the community, rather than in institutions also brings a sharper focus on social capital: helping people with health needs or long term conditions to build links with the community give and get support through informal social networks as well as specific services.

Housing has been defined as a health ‘social determinant.’ Social determinants of health are the key social factors that affect people’s health over their lifetime and can either increase or reduce health inequalities between different groups in society. In comparison to other important social determinants of health, investing in housing and related services are one of the few interventions shown in systematic reviews to narrow inequalities in health outcomes between social groups.¹⁷

The section also enables the HWB to encourage those who arrange for the provision of services related to wider determinants of health, such as housing, to work closely with the HWB; and to promote close working with commissioners of health and social care services.

8.3 Market Shaping and Facilitation

The Care Act places new duties on local authorities to facilitate and shape their market for care, support and related services.

‘Market shaping’ requires local authorities to understand and identify existing, unmet and future needs for care, support and related services and to link this into Joint Strategic Needs Assessments and strategies. There is the expectation that a diverse provider market will be encouraged to invest in innovative and cost-effective service solutions, which support prevention and early intervention.

There are clear links between the Housing Strategy and market shaping in the fundamental importance of the identification of existing and projected longer term needs for housing, care and related services and in our work with providers to ensure that these needs are met.

8.4 Market Facilitation – Housing Need

In terms of housing need, market facilitation includes consideration of issues around:

- How much housing and of what type and size is needed in each of Herefordshire’s seven local market areas?

¹⁷ Public Health Research Consortium (2010) Tackling the Wider Social Determinants of Health and Health Inequalities: Evidence from Systematic Review

- What potential does supported or specialised housing have in avoiding the need for a move into residential care or enabling a move out of it?
- The importance of healthy housing in the private and owner occupied sectors as a 'prescription' to prevent costly health and social care interventions.
- What impact does the quality, design and affordable warmth of existing housing have on repeat hospital admission for people who are vulnerable?
- What types of communities will enable people with care needs to remain living in them or what needs to be done to support this?

In the document, Market Position Statements and Housing,¹⁸ effective facilitation of housing markets starts from access to good market intelligence. This can then be used to encourage the market in particular directions, and to inform discussions with providers, consumers and planners about the type of accommodation that might be needed now and in the future.

8.5 Financial Costs of Poor Housing

In 2010 the BRE Trust published the results of a research project which sought to quantify the cost of people living in poor housing in England to the National Health Service. This was possible because of the availability of information from the English Housing Survey on the risk of a home incident occurring and its likely impact on health, measured through the Housing Health and Safety Rating System (HHSRS), combined with information from the NHS on treatment costs.

The March 2015 Briefing Paper updates the BRE models and calculations in the original research and also widens the definition from 'poor housing' to include all 'sub-standard' housing.

The data shows that the hazards of excess cold and falls are those which have the most impact on health. In terms of the costs of remedial action, excess cold dominates, while some hazards might be remedied for a relatively small cost, for example installing handrails on unsafe stairs or changing dangerous cooker positions.

**The 2015 estimate for the cost of poor housing is £1.4bn,
compared to £600m in the 2010 report.**

The 'Improving the public's health: A resource for local authorities',¹⁹ report quotes research which quantifies the extent of the financial savings to health that can be achieved through 'healthy housing' interventions. Some examples include:

¹⁸ Institute of Public Care, December 2012

¹⁹ Kings Fund, December 2013

- Meeting the NICE guidelines on safety assessments and installing safety equipment in homes would cost £42,000 for an average local authority. If this prevented 10% of injuries, it would save £80,000 in prevented hospital admissions and emergency visits, with further savings in associated GP visits and for ambulance, police and fire services (NICE 2010).
- In the 10 best-performing Safe At Home scheme areas, hospital admissions fell by 29% (Laser Alliance 2012). This equated to an overall saving of £27 million, while the cost of implementing the programme in these areas was just £1.7 million.
- A Birmingham City Council health impact assessment established that a total outlay of £12 million achieved savings of £24 million a year, with the 'quickest wins' arising from improvements related to excess cold and reducing falls amongst older people.

8.6 Healthy Housing - Herefordshire

The Herefordshire Council Healthy Housing Survey 2011 was undertaken to provide a comprehensive review of current housing conditions across Herefordshire, to assess the impact of past policies and initiatives, and to inform future strategy and policy.

The fieldwork was completed during the period October 2011 to January 2012, and consisted of 1,264 individual property surveys, representing a 1.5% random sample of all residential properties in Herefordshire.

Information in the report confirms that the county's older housing profile, restricted access to mains gas, relatively low income levels and lower than average social housing options, combine to create complex housing challenges, each of which has a cumulative adverse impact on the other.

Survey Key Findings:

- 27% of private housing within Herefordshire fail the Decent Homes Standard overall, with a total cost implication of £37,395,278, an average of £1,680 per failing dwelling. Nationally 26.5% of private sector dwellings were non-decent, therefore Herefordshire is performing marginally below the national average.
- 21% of dwellings were assessed as exhibiting Category 1 Housing Health and Safety Rating System (HHSRS) hazards. The English Housing Condition Survey (EHS) 2010-11 reported that nationally 17.1% of private dwellings contained a HHSRS Category 1 failure.
- 26% of households classed as vulnerable, occupy dwellings which fail the Decent Homes Standard, almost half of which are pre 1945 properties.

- In the owner occupied sector 28% of homes are non-decent and 20% of these are occupied by vulnerable households.
- In the private rented sector 32% of dwellings are non-decent and 55% of these are occupied by vulnerable households.
- More than half (52.4%) of households are not in a position to improve the condition of their home. More than a third (37%) are not homeowners, and therefore not responsible for home improvements.

8.7 Fuel Poverty

A fuel poor household is one that cannot afford to keep adequately warm at reasonable cost. Many of these households often face the difficult choice of either paying for sufficient fuel to keep warm or paying for other basic necessities.

16.4% of Herefordshire households were classed as fuel poor in 2012. These figures were higher than those in other parts of the West Midlands region, neighbouring Shropshire and Worcestershire and England as a whole.

Fuel Poverty has become a significant public health priority. Preliminary excess winter death (EWD)²⁰ figures for the period 2012-13 showed an increase of 29% on the equivalent period from 2011-2012.

Public Health England's 2014 Cold Weather Plan demonstrates that winter weather has a direct effect on the incidence of heart attack, stroke, respiratory disease, flu, falls and injuries and hypothermia. Indirect effects include, mental health problems such as depression, and the risk of carbon monoxide poisoning if boilers, cooking and heating appliances are poorly maintained or poorly ventilated.

8.8 Herefordshire Council's Affordable Warmth Strategy 2015-18

The strategy makes the following points:

- Nationally, Fuel Poverty remains a key priority. 2013 figures show that 2.35 million English households live in Fuel Poverty, approximately 10.4 percent of all households in England.
- The government's Fuel Poverty Advisory Group is strongly encouraging the Department of Health, NHS England and Public Health England to support the development of preventative action with a strong focus on fuel poverty alleviation.

²⁰ These are deaths which are directly related to the cold weather. These are people who generally have underlying health problems, but would not have been expected to die during this period.

- Households on fixed low incomes are particularly vulnerable to fuel poverty. These include older people, (especially those who live alone), people with a disability, a long term or life-limiting illness, or mental ill health, single parents with dependent children and those out of or unable to work.
- People living in inefficient housing are also vulnerable. Typically, older properties are less energy efficient and are often less likely to have had insulation improvements installed. They are also often harder to insulate due to the complexities of their construction.

Fuel Poverty remains a significant public health issue. Cold-related illness, stress and excess winter deaths can all be linked to the prevalence of fuel poverty.

Analysis in the council's Affordable Warmth Strategy suggests that, using Age UK (2012) and Herefordshire population data, it can be estimated that the cost to the NHS in Herefordshire owing to cold homes is £4,706,935 and that reducing fuel poverty would lead to consequential reductions in local health spend, GP referrals and hospital admissions.

It is clear therefore, that initiatives promoting healthy housing, affordable warmth and other related services, which are integrated and jointly commissioned across health, housing and social care have significant potential as a preventative activity to help vulnerable people remain well and independent in their own homes.

In addition to the clear health benefits an increase in energy efficiency measure installed in homes could also have a positive impact on the local economy through increased employment opportunities and skills development.

8.9 Home Improvement Agency

A priority for Herefordshire is to provide a range of choice, advice and support to enable older people, disabled and vulnerable people to live safely and independently in their own homes. Latest reports from Age UK showed that 1.9 million bed days were lost to the NHS in the four years to June 2014 as older patients, who were ready to leave hospital, were delayed whilst waiting for home adaptations or care packages to be put in place.

Herefordshire Council's Home Improvement Agency supports vulnerable people to live independently by providing, enabling or signposting to services which promote continued independent living. They also oversee major work such as the installation of level access showers and stair lifts carried out through Disabled Facilities Grants (DFG), which are now part of the Better Care Fund.

9. Actions to Achieve our Priorities

It should be noted that all identified strategic priorities have been developed on the basis of existing, or known, proposed changes to national housing, planning and social welfare policy. However, as at January 2016 this remains in a state of flux and firm futures on which to base our strategic housing priorities remain uncertain.

9.1 Priority 1 Actions: Improving Housing Supply and Access to Housing

Overall, it should be recognised that there are limits on the amount of control that councils' have on the operation of the provider market and consequently on issues such as how much housing is delivered, its affordability and tenure balance.

The majority of new homes will be built by private developers for sale to those seeking and able to buy on the open market. The type, size and location of developments will be directly influenced by housing demand and the affordability of the properties. Additionally a number of affordable rented or intermediate homes will also need to be built for those unable to meet the financial commitment necessary to buy.

However, at the heart of the Government's policy in the National Planning Policy Framework March, 2012 is a presumption in favour of sustainable development. Herefordshire Council intends to achieve this presumption in its published 'Presumption in favour of sustainable development policy.'

In addition, the delivery of new housing will be supported through the following actions:

Delivering New Homes Policy SS2

- A supply of deliverable and developable land will be identified to secure the delivery of a minimum of 16,500 homes in Herefordshire between 2011 and 2031 to meet market and affordable housing need.
- Hereford will be the focus for new housing development to support its role as the main centre in the county. Outside Hereford, the main focus for new housing development will take place in the market towns of Bromyard, Kington, Ledbury, Leominster and Ross on Wye.

Affordable Housing Policy H1 – thresholds and targets

- All new open market housing proposals on sites of more than 10 dwellings, which have a maximum combined gross floor space of more than 1000 sqm will be expected to contribute towards meeting affordable housing needs.
- We have set Indicative affordable housing targets of 35% and 40% have been established for different parts of the county, based on evidence of need and viability in the county's housing market and housing value areas.
- Affordable housing provided under the terms of this policy will be expected to be available in perpetuity for those in local housing need.

Rural Exception Sites Policy H2

- We recognise that the provision of affordable housing is more difficult in rural areas where often the scale and location of new development is more restricted. Proposals for affordable housing schemes in rural areas may be permitted on land, which would not normally be released for housing in accordance with the criteria set down in the policy.
- The policy enables the provision of affordable housing outside of villages, in areas where there is generally a restraint on open market housing, so as to help meet affordable housing needs in rural areas in perpetuity.
- In order to enable the delivery of affordable housing some market housing may be permitted, as part of the development, to subsidise a significant proportion of affordable housing provision. This will need to be evidenced through a financial appraisal as set down in the policy.

Traveller sites Policy H4

- The accommodation needs of travellers will be provided for through the preparation of a Travellers' Development Plan Document (DPD) which will include site specific allocations.
- Traveller sites include those considered necessary to meet the residential needs of gypsies and travellers, who will remain in a location permanently or for substantial periods, transit sites for those moving through the area as well as plots for travelling show people.

Individual or Group Self and Custom Build

- The council recognises that individual or group self and custom build projects will contribute to the delivery of homes over the plan period. These may be in the form of affordable, low cost market and open market housing. We will encourage and support this type of development where the proposals are in line with the relevant policies of the Core Strategy and neighbourhood plans.

Ensuring sufficient housing land delivery Policy SS3

- A sufficient supply of housing land will be maintained to ensure the delivery of the Core Strategy housing target over the plan period. The rate of housing delivery and supply will be assessed through the annual monitoring process.
- If monitoring demonstrates that the number of new dwelling completions is below the cumulative target figure, over a financial year, we will prioritise increasing housing supply in the following monitoring periods.
- In respect to the housing target for the county, the expectation is that the highest rate of housing completions will be towards the latter end of the plan period.

Joint Venture Developments

- We will explore the opportunities for undertaking Joint Venture developments, potentially, as a funding mechanism for the delivery of new student accommodation for Hereford's new university.

Maximise External funding Opportunities

- We will continue to work with the Homes and Communities Agency, the Local Enterprise Partnerships and other partners to maximise the amount of external funding that can be drawn into Herefordshire to promote and deliver housing and economic growth.

Increasing Housing Options and Choice for Older People

We will ensure development of sufficient market rent and affordable housing and appropriate housing with care to meet the future needs of older people, through implementing the actions identified in the Older People's Housing Strategy and Pathway Action Plan.

Review the Home Point Choice Based Lettings (CBL) Allocation Policy

The Home Point Allocations Policy is currently being thoroughly reviewed following consultation with partner agencies and other stakeholders. The review identified a number of issues with the policy, which the reviewed draft policy addresses. Remaining key actions include:

- Modelling the draft policy to ensure it meets identified objectives.
- Undertaking the necessary work to facilitate policy implementation in Autumn 2016.

Priority 2 Actions: Improving Housing Support

Accommodation Based and Floating Support

Housing related support services are commissioned through a competitive tender process, which reflects our commissioning approach of service delivery based on the outcomes to be achieved and the most effective way of securing value for money.

- We will continue to provide accommodation based and floating support to vulnerable people including people with recent offending behaviour, substance misuse, mental health and mild learning disabilities, through a delivery partner.
- We will continue to provide accommodated based housing support for young people, through a delivery partners.
- Discussions are currently between Adults and Wellbeing Directorate, Children's Services and a provider for the development of support specifically targeting young people.

Increase Housing Options and Support Choice for Vulnerable People

- We are working towards delivering a range of housing and support options to address the needs of learning disabled people, autistic people and people with mental ill health.

Preventing Homelessness

- We will ensure that we continue to prevent homelessness occurring through implementing the actions identified in our Homelessness Prevention Strategy 2016-2020. The Homelessness Review 2016-2020 provides the evidence base for the following Strategic Objectives:
 - i. Minimise rough sleeping and increase tenancy sustainment opportunities for rough sleepers and people with complex needs.
 - ii. Maximise homeless prevention activity by building on current success and promoting positive opportunities for homeless people.
 - iii. Help improve the health and wellbeing of homeless people and those who are at risk of homelessness.
 - iv. Ensure homeless people are able to access affordable housing and that support services are targeted effectively.

Maximising External Funding Opportunities

- We intend to maximise investment opportunities to ensure that our housing priorities are delivered. We will work with partners, including RSLs, voluntary and community groups, charitable foundations, the HCA, DoH and

any appropriate organisation to secure additional funding with which to increase the range of services available.

Promoting Independent Living

- We will continue to provide a range of choice, advice and support to enable older people, disabled and vulnerable people to live safely and independently in their own homes.
- Herefordshire Council's Home Improvement Agency (HIA) supports vulnerable people to live independently by providing, enabling or signposting to services which promote continued independent living. The HIA also oversee major work such as the installation of level access showers and stair lifts carried out through Disabled Facilities Grants (DFG), which are now part of the Better Care Fund.

Priority 3 Actions: Improving Housing Quality

As previously identified there are clear links between health and housing. The March 2015 BRE Briefing Paper, 'The Cost of Poor Housing the NHS, estimates the cost of poor housing to be in the region of £1.4bn. This includes the impact of cold homes on health.

- We will ensure that we address the issue of cold homes and fuel poverty in Herefordshire through implementing the actions identified in the Affordable Warmth Strategy 2015-2018.
- We continue to follow up all complaints about disrepair or poor management from tenants and take any necessary enforcement action to make sure that there is no risk to the health and safety of the occupants.
- The council no longer has the financial resources to improve the condition of all non-decent private sector homes and needs to identify other ways to help fund work. This may include considering equity release schemes.
- We are considering the resource feasibility of developing housing and health profiles in accordance with Housing and Health Toolkit developed on behalf of the Chartered Institute of Environment Health and commissioned by Public Health England.