

Central Bedfordshire  
Council  
Priory House  
Monks Walk  
Chicksands,  
Shefford SG17 5TQ



**please ask for** Paula Everitt  
**direct line** 0300 300 4196  
**date** 17 July 2014

## **NOTICE OF MEETING**

### **SOCIAL CARE, HEALTH & HOUSING OVERVIEW & SCRUTINY COMMITTEE**

Date & Time

**Monday, 28 July 2014 10.00 a.m.**

Venue at

**Council Chamber, Priory House, Monks Walk, Shefford**

Richard Carr  
**Chief Executive**

To: The Chairman and Members of the SOCIAL CARE, HEALTH & HOUSING OVERVIEW & SCRUTINY COMMITTEE:

Cllrs Mrs R J Drinkwater (Chairman), Mrs D B Gurney (Vice-Chairman), R D Berry, Mrs G Clarke, P A Duckett, C C Gomm, Mrs S A Goodchild, N J Sheppard and M A Smith

[Named Substitutes:

P N Aldis, Mrs C F Chapman MBE, Ms A M W Graham, D J Hopkin, D McVicar and Miss A Sparrow]

All other Members of the Council - on request

**MEMBERS OF THE PRESS AND PUBLIC ARE WELCOME TO ATTEND THIS  
MEETING**

# AGENDA

1. **Apologies for Absence**

Apologies for absence and notification of substitute members

2. **Minutes**

To approve as a correct record the Minutes of the meeting of the Children's Services Overview and Scrutiny Committee held on 23 June 2014 and to note actions taken since that meeting.

3. **Members' Interests**

To receive from Members any declarations of interest and of any political whip in relation to any agenda item.

4. **Chairman's Announcements and Communications**

To receive any announcements from the Chairman and any matters of communication.

5. **Petitions**

To receive petitions from members of the public in accordance with the Public Participation Procedure as set out in Annex 2 of Part A4 of the Constitution.

6. **Questions, Statements or Deputations**

To receive any questions, statements or deputations from members of the public in accordance with the Public Participation Procedure as set out in Annex 1 of part A4 of the Constitution.

7. **Call-In**

To consider any decision of the Executive referred to this Committee for review in accordance with Procedure Rule 10.10 of Part D2.

8. **Requested Items**

To consider any items referred to the Committee at the request of a Member under Procedure Rule 3.1 of Part D2 of the Constitution.

9. **Executive Member Update**

## Part A: Health Scrutiny

to consider matters relating to health of adults, children and young people and 'substantial' changes to NHS provision in Central Bedfordshire.

### Reports

Item	Subject	Page Nos.
10	<b>East &amp; North Herts NHS Trust</b>  To consider the response from the East and North Herts NHS Trust to questions raised by the Committee on the Trust's Quality Account presentation in May 2014.	* Verbal
11	<b>Joint Health and Wellbeing Board Strategy</b>  To consider and comment on the Joint Health and Wellbeing Board Strategy refresh.	* 13 - 18

## Part B: Social Care and Housing

To consider matters relating to adult social care and housing services and any other matters that fall within the remit of the Social Care, Health and Housing Directorate.

### Reports

Item	Subject	Page Nos.
12	<b>Discharge of Homelessness Duty Policy</b>  To consider and comment on the draft Discharge of Homelessness Duty Policy and associated consultation report and EIA.	* 19 - 80
13	<b>Revenue, Capital and Housing Revenue Account</b>  To consider the Revenue, Capital and Housing Revenue Account Outturn 2013/14.	* 81 - 90
14	<b>Quarter 4 Performance Report</b>  To consider the Quarter 4 performance report.	* 91 - 100
15	<b>Work Programme 2014-15 and Executive Forward Plan</b>  The report provides Members with details of the currently drafted Committee work programme and the latest Executive forward plan.	* 101 - 104

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**CENTRAL BEDFORDSHIRE COUNCIL**

At a meeting of the **SOCIAL CARE, HEALTH & HOUSING OVERVIEW & SCRUTINY COMMITTEE** held in Council Chamber, Priory House, Monks Walk, Shefford on Monday, 23 June 2014.

**PRESENT**

Cllr Mrs R J Drinkwater (Chairman)  
Cllr Mrs D B Gurney (Vice-Chairman)

Cllrs R D Berry  
P A Duckett  
Mrs S A Goodchild

Cllrs N J Sheppard  
M A Smith

Apologies for Absence: Cllrs Mrs G Clarke  
C C Gomm

Substitutes: Cllrs Mrs C F Chapman MBE  
Miss A Sparrow

Members in Attendance:	Cllrs P N Aldis Mrs A Barker  A L Dodwell  Dr R Egan C Hegley  M R Jones  A M Turner  M A G Versallion	Chairman of Children's Services Overview and Scrutiny Committee Deputy Executive Member for Children's Services and Community Services  Executive Member for Social Care, Health & Housing Deputy Leader and Executive Member for Corporate Resources Deputy Executive Member for Social Care, Health & Housing Executive Member for Children's Services
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Officers in Attendance:	Mr D Jones Mr T Keaveney Mr N Murley Mr G Muskett Mrs J Ogley	– Interim Consultant, Adult Social Care – Assistant Director Housing Services – Assistant Director Business & Performance – Head of Revenues & Benefits – Director of Social Care, Health and Housing
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	Mrs E Saunders	– Assistant Director Commissioning
	Mr C Warboys	– Chief Finance Officer
Others in Attendance	Mrs A Evans	Director of Housing Services, Aragon Housing Association
	Ms R Featherstone	Chair - Healthwatch Central Bedfordshire
	Miss A Florio	Systems Redesign Manager, BCCG
	Mr A Humphreys	Chief Executive Grand Union Housing Group
	Dr G Newmarch	Interim Director of Strategy & System Redesign, BCCG

#### SCHH/14/16 **Minutes**

##### **RESOLVED**

**that the minutes of the meeting of the Social Care Health and Housing Overview and Scrutiny Committee held on 12 May 2014 be confirmed and signed by the Chairman as a correct record.**

#### SCHH/14/17 **Members' Interests**

Cllrs Mrs R Drinkwater and P N Aldis declared an interest as appointed members of the Aragon Housing Association Board. Cllrs Mrs A Barker and M Smith declared an interest as appointed members of the Citizens Advice Bureau Board.

#### SCHH/14/18 **Chairman's Announcements and Communications**

The Chairman announced the adjournment of the meeting at 10.15am so Members present could join the flag raising ceremony for Armed Forces Day.

The Chairman also announced the postponement of the Domiciliary Care and Mental Health Member briefings for which a new date would be circulated to Members.

Members were updated on the outcomes of the Joint Health Overview and Scrutiny (JHOSC) meeting held on 11 June 2014. The JHOSC had considered the first draft of the proposed models of care for community and hospital services and received confirmation that the business report would be completed by 31 July, 2014.

The BCCG continued in its pre consultation work and wished to engage with 'hard to reach' groups, especially the frail and elderly. Members were requested to support this engagement work. The next meeting of the JHOSC, scheduled for Monday 07 July, 2014 at 4pm at Priory House, Chicksands, and would include the latest iteration on models of care, a report on travel and transportation and the draft consultation plan.

#### SCHH/14/19 **Petitions**

None.

#### SCHH/14/20 **Questions, Statements or Deputations**

The Committee had received a question from Mr M Lewis relating to changes in mental health and learning difficulties provision in the county. Mr Lewis highlighted the need to ensure the workforce was suitably trained to deal with a varying age range of people in the community with mental illness problems. Mr Lewis also circulated a letter he had received from Lord Earl Howe at the Department of Health in support of his question.

The Assistant Director Commissioning thanked Mr Lewis for his question and provided the following response:-

- That provision of service user and carer engagement work was undertaken in partnership with the Bedfordshire Clinical Commissioning Group and providers to address the local mental health agenda.
- That contractual arrangements included the provision of training opportunities for staff. From March 2015 all health care workers and adult social care workers will be required to complete the new 'Care Certificate' on entry to the sector.

The full question from Mr Lewis and response are attached as an addendum to the Minutes.

#### SCHH/14/21 **Call-In**

None.

#### SCHH/14/22 **Requested Items**

None.

#### SCHH/14/23 **Executive Member Update**

The Chairman added an urgent item to brief the Committee on matters pertaining to the Executive Member's portfolio that were not already included on the Agenda. The Executive Member commented on the following:-

- Attendance at meetings regarding the Housing Investment Plan.
- Consideration of revised performance monitoring criteria for the directorate.
- A visit to the Commission Team at Houghton Lodge, Ampthill
- A successful Member briefing session on the Welfare Reforms.
- A meeting to discuss a refresh to the Health and Wellbeing Board Strategy.
- The Healthier Communities and Older People Partnership Board meeting and projects being undertaken on suicide rates.

#### SCHH/14/24 **Better Care Fund Report**

The Director of Social Care Health and Housing advised the Committee that the April Better Care Fund submission had received positive feedback and included zero red indicators, nine amber and 17 green indicators.

Further work is required to quantify the performance targets and measures that will apply to the Fund. Similarly the outcome of the Strategic Review of Healthcare in Bedfordshire and Milton Keynes will have an impact on the shaping of services and how investment through the Better Care Fund is used for best effect.

In light of the update, Members raised the following issues:

- Concern that no progress had been made to improve the IT and data flow amongst providers. The Director of SCHH explained that Government guidance was expected, however, there had been no significant improvement in this area for a number of years.
- Acknowledgement that a transformation fund was required to help deliver the reforms, the Healthcare Review and the importance of this piece of work.

**NOTED the update.**

#### SCHH/14/25 **Specialist Fertility Treatment Local Criteria**

The Chairman welcomed Angelina Florio, System Redesign Manager and Dr Gail Newmarch, Interim System Redesign Director at Bedfordshire Clinical Commission Group. Mrs Florio introduced her report on Specialist Fertility Treatment Local Criteria and updated the Committee on progress which included consultation work to be undertaken with the Consultation Institute.

To capture the views of Bedfordshire people, the consultation would be split into three phases:-

- Pre-consultation stage to end July 2014
- Stakeholder events and
- Formal consultation 1 September 2014 – 31 October 2014

A web page would also be made available to those residents who wished to contribute to the consultation anonymously.

In light of the presentation, Members discussed the following :-

- That the BCCG should consider the views of cancer patients who might face fertility issues.
- That NICE guidelines recommended three cycles of IVF treatment where as the proposals were for two cycles in the region. In response Mrs Florio explained two cycles was affordable and equitable and had been agreed by a consortium of clinicians in the Eastern Region.
- The need for clarity regarding the number of successful outcomes for the 40-42 year age group receiving 1 cycle of treatment. It was agreed that this information be provided to the Committee outside of the meeting.
- That the consultation would describe alternative offers to patients, for example fostering and adoption.
- That the Committee receive a copy of the consultation document and the outcomes of the consultation.

**RECOMMENDED**



1. That the Committee's comments be considered in the consultation work undertaken by the BCCG.
2. That the consultation document and outcomes of the process be reported to the Committee.

SCHH/14/26 **Housing led Investment in Central Bedfordshire to deliver new homes and regeneration**

The Chairman welcomed Alan Humphreys Chief Executive of Grand Union Housing Group and Alieen Evans Managing Director of Aragon Housing Association. Mr Humphreys gave a presentation that outlined the history of the Grand Union Housing Group and Aragon Housing, the services provided to residents and their achievements to date. A significant investment in new homes and existing properties had been met by Aragon and grants received from the Housing Corporation was outlined along with their future programme and tenure breakdown.

The Grand Union Group and Aragon Housing Association had established a consortium with neighbouring Housing Associations to enhance the number of projects it could deliver but emphasised it had the capacity to do more and work in partnership with Central Bedfordshire colleagues. Members recognised the work undertaken by Aragon Housing in the community particularly with young people.

In light of the presentation Members discussed the following:-

- The provision of lifetime homes for older people. Mr Humphreys explained whilst life time homes were being built, the housing group wished to provide a range of property that would encourage residents to move out of family accommodation as and when their circumstances changed. However, he recognised that this was dependent on suitable alternative accommodation being available.
- The steps the Association had taken to provide smaller properties in order that residents might downsize as a result of the impact of the Welfare Reforms. In response Aragon proposed new build schemes to meet this need, however, the changes had resulted in fewer requests for 3 bedroom properties within its existing stock.
- Concerns regarding the cost of market rents and that shared ownership also needed to be affordable. These concerns were acknowledged and whilst Aragon had little influence with private developers, they were able to keep costs down through its own developments. Aragon was also re-letting properties at social rent rather than the higher affordable rent with little flexibility on the initial shared purchase. It falls on the LA via its S106 agreement to prevent this happening.
- Whether the amount of outside space could be increased on new build sites in order that children could play and reduce the risk of obesity and other health issues. Aragon supported this in principle, however, the cost implication was an issue and they had little influence on the section 106 developments.

The Assistant Director Housing introduced a presentation that had been deferred from the previous meeting. The draft Housing Investment Plan

outlined the investment potential available to the Council that was in the region of £150m over the next 30 years. The approach to investment included opportunities to bring schemes forward of varying sizes and the opportunity to work with Aragon and other Housing Associations in all wards. Schemes in Croft Green Dunstable, 26 units and Creasey Park Dunstable, four units, would be submitted for approval shortly. Other considerations for development included the redevelopment of garage sites, improvements to current housing stock, estate improvements, new build and partnership opportunities.

The Council had achieved partnership status with the Homes and Communities Agency (HCA) and secured a grant of £1.7m for Priory View in Dunstable. Officers would be looking to strengthen their relationship with the HCA to maximise the Council's opportunity for develop and investment.

A set of 'golden rules' to guide the Council's investment approach in addition to the programme and the approach to be taken forward, including the formation of an investment panel was also outlined on which Members views were sought.

In light of the presentation, Members discussed the following:-

- Support for the estate improvements that included the redevelopment of some garage blocks.
- Support for the proposal to offer small new build developments for smaller wards and local people
- A request to refer to affordable housing as 'social housing' in the plan.
- That the Tenants Scrutiny Panel be fully involved in the process.

Members fully supported Housing Investment Plan golden rules as a basis to plan Housing Investment for the future benefit of Central Bedfordshire residents.

#### **RECOMMENDED**

- 1. That the Social Care Health and Housing OSC fully support Aragon Housing Association and help to build on the current excellent partnership arrangements for the residents of Central Bedfordshire.**
- 2. That the 'Golden Rules' principle to guide the Council's investment plan be supported.**

#### SCHH/14/27 **Welfare Reforms**

The Chief Finance Officer introduced a report that followed recent Member Briefing. The report provided highlights of the work undertaken by the Welfare Reform Board and the impact of the Welfare Reforms on residents, key partners and the Council.

In light of the report, Members discussed several issues and commented in details as follow:-

- Whether reference in the report to Credit Unions in Central Bedfordshire was correct. The Director of Social Care Health and Housing advised that

that the Credit Union had previously covered the Mid Bedfordshire area, however, was now able to support the whole of Central Bedfordshire.

- Concern there was no support available to help those with disability or ill health back into work because of employers concerns. The Portfolio Holder for Social Care, Health and Housing advised of an initiative called 'Two Tick' that had been established for this reason.

**NOTED the report.**

#### SCHH/14/28 **Discretionary Housing Payments Policy**

The Chief Finance Officer introduced the draft Discretionary Housing Payment Policy. The purpose of this policy was to standardise the current procedures in place to award discretionary housing payments to assist residents with their housing costs, following guidance issued by the Department of Work and Pensions. It was noted that 75% of applications received were successful. With the increase in activity in this area, officers proposed that a strategy to formalise the process was necessary.

In light of the report and draft policy, Members raised a number of points of clarification that were addressed by the Deputy Leader and Portfolio Holder for Corporate Resources and Chief Finance Officer as follows:

- Whether Priory Group 2 and the list of those claimants the Council was able to help were in any order of priority and whether claimants had to meet one or more of the priority areas. The Chief Finance Officer confirmed the list was not in order of priority and the Council would seek to help claimants if they met one or more of the areas shown.
- Concern relating to the high costs of removals offered to claimants. The Chief Finance Officer confirmed just one claimant had received this payment in the year and it was the Council's policy to meet the payment if circumstances require this, as part of assisting claimants to downsize their accommodation.

**RECOMMENDED that the Social Care Health and Housing OSC fully support the proposed policy for Discretionary Housing Payment.**

#### SCHH/14/29 **Work Programme 2014-15 and Executive Forward Plan**

The Committee considered its current Work Programme and the latest Executive Forward Plan. The Chairman proposed that an item be added to the current arrangements for Stroke Services and where provision had been identified for Central Bedfordshire residents

**RECOMMENDED That the work programme be approved subject to the inclusion of the Stroke Service report.**

(Note: The meeting commenced at 10.00 a.m. and concluded at 1.50 p.m.)

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**Meeting:** Social Care, Health and Housing Overview and Scrutiny Committee  
**Date:** 28<sup>th</sup> July 2014  
**Subject:** Joint Health and Wellbeing Strategy Refresh  
**Report of:** Cllr Hegley , Executive Member for Social Care, Health and Housing  
**Summary:** The report outlines the rational for the refresh of the Joint Health and Wellbeing Strategy, its main priorities and the proposed process for the refresh.

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**Advising Officer:** Muriel Scott, Director of Public Health  
**Contact Officer:** Mei-Li Kvello, Public Health Registrar  
**Public/Exempt:** Public  
**Wards Affected:** All  
**Function of:** Council

<b>CORPORATE IMPLICATIONS</b>
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<b>Council Priorities:</b>
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| <ol style="list-style-type: none"> <li>1. The Joint Health and wellbeing Strategy (JHWS) will support the CBC priority to Promote health and wellbeing and protecting the vulnerable.</li> </ol> |
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<b>Financial:</b>
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| <ol style="list-style-type: none"> <li>2. Delivery of the refreshed strategy will be within existing budgets and financial constraints.</li> </ol> |
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<b>Legal:</b>
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| <ol style="list-style-type: none"> <li>3. There are no legal implications</li> </ol> |
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<b>Risk Management:</b>
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| <ol style="list-style-type: none"> <li>4. Any risk associated with the delivery of the strategy will be captured within directorate and corporate risk registers</li> </ol> |
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<b>Staffing (including Trades Unions):</b>
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- |  |
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| <ol style="list-style-type: none"> <li>5. Not Applicable.</li> </ol> |
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<b>Equalities/Human Rights:</b>
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| <ol style="list-style-type: none"> <li>6. The JHWS will be subject to an equality impact assessment once it has been finalised.</li> </ol> |
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<b>Public Health</b>
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- |  |
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| <ol style="list-style-type: none"> <li>7. Successful delivery of the Health and Wellbeing Strategy will have a significant impact upon the health and wellbeing of the population and reduce inequalities in health</li> </ol> |
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**Community Safety:**

8. Not Applicable.

**Sustainability:**

9. Not Applicable.

**Procurement:**

10. Not applicable.

**RECOMMENDATION(S):**

**The Committee is asked to:-**

- 1. To comment upon the priorities and objectives identified to date in the refresh of the Joint Health and Wellbeing Strategy.**

**Background**

11. Nationally, Joint Strategic Health and Wellbeing Strategies have completed their first year of action. The strategies that have been more successful have been those which have been focussed in their priorities. There are some priorities in the current strategy (Appendix A) which, whilst important in their own right, do not need the Health and Wellbeing Board to assure progress and therefore reports to the board have sometimes been to show progress rather than challenge the board to take action. Also the current health and wellbeing strategy could be more directed towards the areas where the board can make the greatest difference e.g. through the integration of commissioning and service delivery.

12. The JHWS should be directly informed by the Joint Strategic Needs Assessment (JSNA) and the latest refresh of the JSNA showed that:
- Central Bedfordshire is generally a great place to live but there are differences in people's experience which can be explained in part by the wider determinants of health such as housing, employment and the built environment
  - Every child deserves the best possible start in life and although infant mortality rates have been comparatively low, they increased in 2011/12, driven in part due to poorer antenatal and post natal outcomes in south Central Bedfordshire.
  - Educational attainment and employment for young people needs to be an area of continued focus.
  - Vulnerable children and young people are at increased risk of poorer outcomes and focused work is required to support children and young people to make healthy lifestyle choices and reduce risky behaviours
  - Good Mental health and wellbeing is critical for all and there is some evidence to show that this need is growing e.g. as a result of domestic violence.
  - Premature mortality is falling in Central Bedfordshire but is higher than statistical neighbours for cancer, coronary heart disease and respiratory disease.
  - The increasing population of older people with their associated needs has many implications including housing and accommodation, support to maintain independence, the integration of care and the prevention of unnecessary admissions to acute or residential care.

This has confirmed a number of areas contained within the current strategy and identified some areas which may need to be strengthened within the JHWS such as:

- 13.
- Ensuring that every child has the best start in life (particularly in the antenatal and post natal period).
  - Effective management of long term conditions and reducing variation in care.

### **Proposed Strategy**

14. A draft set of Priorities and Objectives was presented and agreed by the Health and Wellbeing Board (HWB) at its meeting on 5th June 2014. There are four main priorities proposed within the revised health and wellbeing strategy (Appendix B).
- Ensuring good mental health and wellbeing at every age
  - Giving every child the best start in life
  - Enabling People to stay healthy longer
  - Improving outcomes for frail older people.
15. Each priority area has a number of proposed objectives which will fulfil the following criteria:
- Recommended within the JSNA.
  - Progress best achieved by action of the HWB.
  - Able to be monitored through measureable outcomes.

17. The next stage of the process to create a refreshed JHWS requires discussions and engagement with stakeholders. The outcomes of this process will be:
  - final selection of objectives within priority areas; and
  - identification of key objective within priority areas.
  
18. The draft Strategy will be presented to the Board on 2nd October 2014. Subject to amendments requested at that meeting, the document will then go out for public consultation.

**Appendices:**

Appendix A – Current Joint Health and Wellbeing Strategy Priorities

Appendix B – Proposed Joint Health and Wellbeing Strategy Priorities

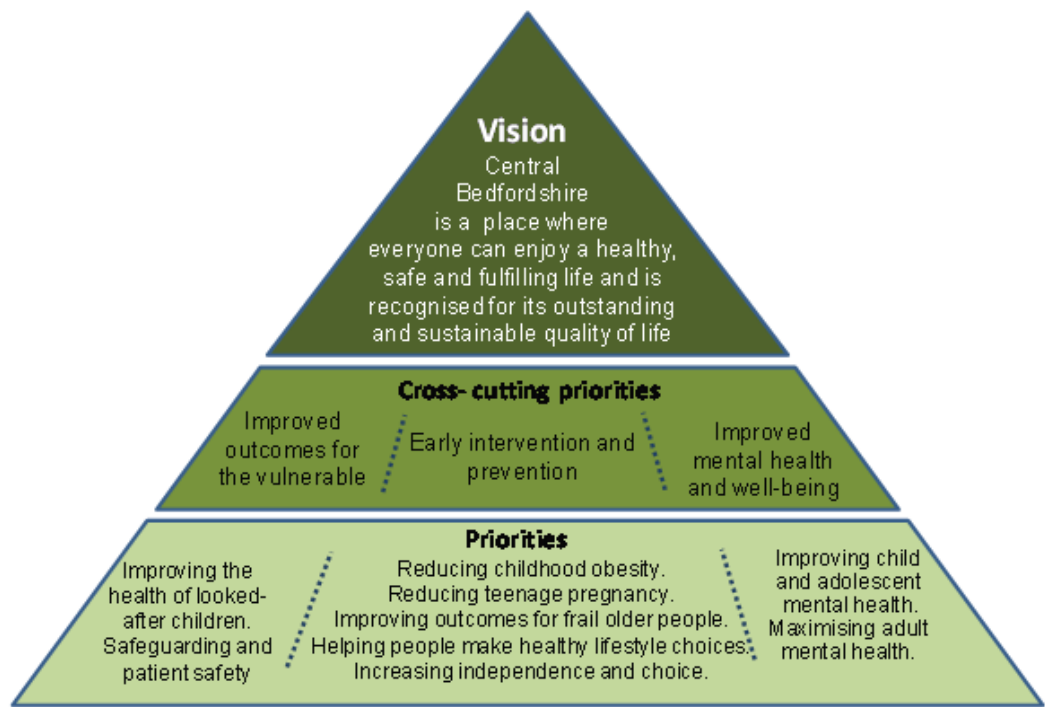
**Background papers and their location:** (open to public inspection)

Joint Strategic Needs Assessment – [www.centralbedfordshire.gov.uk/jsna](http://www.centralbedfordshire.gov.uk/jsna)



Appendix A

Current Joint Health and Wellbeing Strategy Priorities



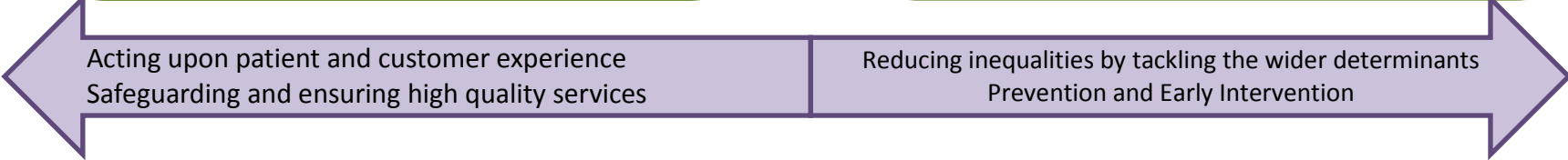
**Proposed Central Bedfordshire Health and Wellbeing Strategy 2014**

**Ensuring good mental health and wellbeing at every age**

Delivering timely and co-ordinated mental health support to children and young people.  
 Commissioning services in primary and secondary care that are effective and integrated.  
 Providing early support and care for those with dementia and their carers.  
 Ensuring clear pathways between mental health, physical health and addiction services.

**Giving every child the best start in life**

Commissioning excellent antenatal care.  
 Ensuring targeted parenting and other support for families to enable them to adopt and maintain a healthy lifestyle.  
 Prioritising improvement in health outcomes for the most vulnerable and disadvantaged in our community.  
 Working in partnership to tackle the circumstances where children in families are affected by the toxic trio of domestic abuse, alcohol and drug misuse and mental ill health.



**Improving outcomes for Frail Older People**

Reshaping the model for prevention and early intervention  
 Supporting people with long-term conditions through multi-disciplinary working  
 Expanding the range of services that support older people with frailty and disabilities  
 Restructuring the integrated pathways for those with urgent care needs

**Enabling people to stay healthy longer**

Supporting the adoption of healthy lifestyles such as healthy weight, being physically active drinking sensibly and not smoking.  
 Identifying long term conditions early through health checks and screening  
 Managing long term conditions effectively and reducing variation in primary care

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**Meeting:** Social Care Health and Housing Overview and Scrutiny Committee  
**Date:** 28 July 2014  
**Subject:** Policy to Discharge the Council's Homelessness Duty to a Suitable Property  
**Report of:** Cllr Hegley, Executive Member for Social Care, Health and Housing  
**Summary:** The report proposes that the draft Policy to Discharge the Council's Homelessness Duty to a Suitable Property is presented to Executive for approval.

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**Advising Officer:** Julie Ogley, Director of Social Care, Health and Housing  
**Contact Officer:** Nick Costin, Head of Housing Solutions  
**Public/Exempt:** Public  
**Wards Affected:** All  
**Function of:** Council

#### **CORPORATE IMPLICATIONS**

##### **Council Priorities:**

1. The report supports the following Council Priority:
  - Promote health and wellbeing and protecting the vulnerable.

##### **Financial:**

2. Currently, the Council receives Homelessness Prevention funding, which is partly used to provide incentives to landlords to work with the Council and provide private tenancies to customers approaching the Council. Budget monitoring ensures that the level of activity does not exceed the external funding provided to the Council. Consequently, there are no budget implications arising from this policy as expenditure is externally funded and contained within existing budgets.
3. Officers will continue to explore all external funding opportunities to maximise the availability of private rented sector accommodation to the Council. This includes, in some case, the return of tenancy deposits, which can be recycled for future customers' deposits.

##### **Legal:**

4. The Localism Act 2011 (Part 7) enables local authorities to discharge their duty towards homeless households in priority need by using privately rented housing irrespective of whether the household is in agreement with this. The Council previously had the power to discharge duty to social rented accommodation.

**Risk Management:**

5. The policy includes suitability criteria to reduce the risk that the Council discharges its homelessness duty to an unsuitable property and consequently, the risk that homeless households may be placed in unsuitable accommodation. The suitability criteria have been subject to consultation, in particular having regard to the Council's equality and diversity duties and Government guidance. The policy also mitigates the risks of failing to deliver the Council's priorities and failing to discharge its statutory responsibilities.

**Staffing (including Trades Unions):**

6. Not Applicable.

**Equalities/Human Rights:**

7. Central Bedfordshire Council has a statutory duty to promote equality of opportunity, eliminate unlawful discrimination, harassment and victimisation and foster good relations in respect of nine protected characteristics; age disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
8. The draft policy is subject to an Equalities Impact Assessment (attached at appendix B) and has been presented to the Equalities Forum, whose comments and concerns have helped shape the policy. In particular, there is a commitment that the implementation of the policy will be monitored to ensure that there is not a disproportionately negative effect on people from different ethnic groups, disabled people, women, and children and young people. These groups have been identified as being more likely to be affected by the policy.
9. Applicants considered vulnerable, requiring adaptations to the property due to their disability and those fleeing domestic violence, violence or harassment will be exempt from private sector offers. This will ensure that these groups can receive the support that social housing is typically more readily able to provide. This will also reduce repeat homelessness. The suitable property criteria provide additional protections for vulnerable households so that they are not placed in poor quality accommodation. The risk that homeless households might be placed in unsuitable accommodation will be reduced.
10. Homeless households should benefit from a reduced length of stay in temporary accommodation (TA). This will reduce stress, frustration and the financial impacts. The suitable location criteria will protect children from being moved away from a school during important exam years. Older and disabled people that rely on family and friends delivering care and support will not be detrimentally impacted as homeless households providing this support will be housed within suitable proximity to enable them to continue to deliver this support. Homeless households will not have to make a choice between a home and employment as the criteria takes in to account access to employment.

11. Proximity to cultural and faith resources are not specifically highlighted in the policy, however under human rights legislation individuals have a right to hold a religious belief but the right to manifest that belief is qualified. To ensure that the Council meets this requirement the policy states “due regard will be given to issues related to the Equality Act protected characteristics’ to take account of access to religion or belief”.

**Public Health**

12. Poor housing can have a detrimental effect on the health and well being of households. The risk that homeless households might be placed in unsuitable accommodation will be reduced through the application of the suitability criteria, which includes the requirement that no category 1 hazards are present within the property.

**Community Safety:**

13. The draft policy includes particular safeguards for applicants fleeing domestic violence; other violence; or harassment. There are also safeguards concerning younger people, who may be at greater risk in some types of shared accommodation and might need a greater level of support to sustain a tenancy.

**Sustainability:**

14. The policy will require that a valid energy performance certificate is available and that there are no category 1 hazards relating to Excess Cold. The intention is that accommodation is not unaffordable for tenants to keep warm and safe. This in turn should encourage sustainable tenancies and reduce incidences of repeat homelessness.

**Procurement:**

15. Not applicable. The policy and legislation requires that a property is affordable to the homelessness applicant. This will determine which properties can and cannot be used to discharge duty.

**RECOMMENDATION(S):**

**The Committee is asked to:-**

- 1. Consider the feedback received as a result of the public consultation on the draft Policy to Discharge the Council’s Homelessness Duty to a Suitable Property.**
- 2. Consider the Policy to Discharge the Council’s Homelessness Duty to a Suitable Property (Appendix A), with particular regard to the Council’s duty to promote equality and provide comment to the Executive.**

## Background

16. The Council has embarked upon an ambitious programme of housing reform, driven largely through the opportunities presented by the Localism Act 2011. Following Member seminars held in August 2012, June 2013 and subsequently, the work of a member Task and Finish group, a local Housing Green Paper was developed, setting out the direction of travel and broad aims. The local Green Paper's vision for Housing in Central Bedfordshire includes:
- Social mobility will be supported with a range of products which will open up home ownership and 'affordable' renting to a greater number of households, helping people onto the 'housing ladder'.
  - The local housing market will offer a good choice of locations, property and tenure types to older people.
  - Well-managed, good quality social housing will be used to provide a strong safety net to those who are vulnerable.
  - Social housing will be allocated fairly, and used to support people's working lives.
  - Social landlords will support their tenants to make the most of their tenancy as a springboard into work and financial stability.
17. The Localism Act 2011 introduced changes in legislation which gives Local Housing Authorities greater freedom and flexibility in determining who can apply for social housing. The Housing Allocations Policy governs who can apply to join the housing register, the size of the property for which a person can apply and the priority given to housing applications. The same Act also provided local authorities with the power to discharge the homelessness duty to the private rented sector without consent from homeless applicants applying as homeless to the Council. The development of a Policy to Discharge the Council's Homelessness Duty to a Suitable Property is a key step within the scope of the local Housing Green Paper.

## Context and demand

18. Demand for Housing advice, including Homelessness is growing. There were 2,206 households approaching the Council in 2013/14, an increase from 1,841 in 2012/13. Whilst the number of Homelessness Cases Determined fell slightly from 176 (in 2012/13) to 160 (2013/14), this was mainly due to increased Homelessness Prevention activity, which increased from 655 households to 727. These cases are where Homelessness is prevented or relieved.

19. There has been success in 2013/14 in preventing homelessness through arranging a private rented sector (PRS) tenancies for a households approaching the Council. Building relationships with private landlords and having a focused “point of contact” resource increased the number of PRS lets from 14 in 2012/13 to 69 in 2013/14. This success in prevention has also seen a small reduction in Bed and Breakfast use, with 57 households being housed in Bed and Breakfast during the year, a reduction from 71 in 2012/13. Both years are, however, higher than 2011/12 when 35 households were placed in Bed and Breakfast.
20. Whilst there is work to identify alternative and less costly temporary accommodation, the approval of the Policy to Discharge the Council’s Homelessness Duty to a Suitable Property may provide an extra incentive for households approaching the Council as homeless to consider more closely the prevention options, in particular the PRS, as this is potentially where the duty could be discharged were the household to be accepted as priority homeless. Evidence suggests that locally the PRS has grown to around 14 to 15% of the housing stock and whilst much will be unaffordable to people approaching as homeless, there will be some supply available to the Council through partnership working with landlords.

#### **Suitable Home Criteria consultation outcomes**

21. The draft Policy to Discharge the Council’s Homelessness Duty to a Suitable Property (Appendix A) sets out the proposed criteria that the Council will consider in assessing whether an available property (Social Rented or Private Sector) is suitable for a household accepted as Priority Homeless (where the Council has a statutory duty to rehouse that household). The suitability criteria are closely aligned with Government guidance and have been the focus of consultation and stakeholder engagement.
22. Whilst there was not a large response to consultation, for most of the proposed suitability criteria, there was between 91% and 100% support. There were some concerns about discharging homelessness duty to a property in a neighbouring authority area but still 72% agreed with the safeguards being proposed.
23. There was near 100% agreement with the criteria that deemed a property to be unsuitable. Some comments questioned whether there should be a valid Energy Performance Certificate provided. This is, however, a legal requirement for new lettings.

24. The consultation outcome document (Appendix C) also provides some qualitative feedback and comment, particularly those stakeholders who have experience of homelessness or applying for housing with the Council. The document records responses to these comments and where appropriate the changes to the policy that have been made. Some comments were concerning finer detail of what needs to be considered by Officers in determining suitability. The finer detail points, aligned with the draft policy, will be included in a Staff Good Practice Guidance document that will be prepared as the Policy is approved.

### **Conclusion and Next Steps**

25. The growing demand from residents approaching the Council, potentially as homeless, has implications on resources and how the Council makes best use of housing stock to meet housing need. The Localism Act encourages local authorities to consider wider options in meeting housing need, in particular the private rented sector, which has grown in Central Bedfordshire.
26. The Housing Green Paper sets strategic direction for Housing in Central Bedfordshire and the Policy to Discharge the Council's Homelessness Duty to a Suitable Property is a key step in meeting the aims of the Green Paper.
27. The policy contains suitability criteria that have been generally accepted through engagement and consultation, and meet Government guidance and legislation. Outcomes from the policy will be monitored to ensure that the Council meeting its Equalities and Human Rights duties.

### **Appendices:**

Appendix A – Draft Policy to Discharge the Council's Homelessness Duty to a Suitable Property

Appendix B – Equalities Impact Assessment

Appendix C – Consultation and Engagement Outcomes document





Appendix A

## Discharge Homelessness Duty to a Suitable Home Policy

<b>Directorate</b>	Social Care Health and Housing		
<b>Service</b>	Housing Solutions, Housing Services		
<b>Author</b>	Jo Bellamy, Policy and Performance Officer		
<b>Approved by</b>		<b>Version</b>	0.7
<b>Approval date</b>		<b>Review date</b>	

## **SECTION 1. INTRODUCTION**

- 1.1 Local authorities can discharge their homelessness duties through securing suitable, available accommodation for the household. The property can be either social housing or a property in the private rented sector. A local authority can end its main homelessness duty through an offer of a suitable home, without requiring the applicant's agreement.
- 1.2 The power to discharge the homelessness duty to the private rented sector without consent applies to new homeless applicants applying as homeless from 9 November 2012. However, the Council will only apply this policy to applicants where the homelessness duty is accepted after formal approval of the policy. Applicants that were accepted as homeless under the duty before the policy approval date will not have a private sector offer.
- 1.3 Statutory regulations require local authorities to take a number of matters into account in determining the suitability of accommodation. The Council's suitability criteria are set out in this policy.

## **SECTION 2. PURPOSE**

- 2.1 This policy sets out the Council's approach to discharging its homelessness duty and the definition of a suitable home.
- 2.2 This policy introduces more flexibility in preventing homelessness. Suitable private accommodation will be offered to the client, who initially appears to be homeless with priority need, before an application is made. This should resolve homelessness more quickly; as if a homelessness application is successful, the same property will be offered to the client thereby ending the homelessness duty.

## **SECTION 3. SCOPE, DEFINITIONS AND RELATED POLICIES**

- 3.1 This policy is supported by the practice guidance, which sets out the information that officers should consider when determining the suitability of a property.
- 3.2 The Homelessness Strategy sets out the Council's approach to preventing homelessness and discharging our duty. The strategy, which is due for review in 2014, will set out the Council's approach to ensuring the appropriate supply of private sector properties to enable the timely discharge of our duty.
- 3.3 Definitions**
  - 3.3.1 Private Sector Offer – is defined by section 193 of the Localism Act 2011 as an offer of an assured short hold tenancy made by a private landlord to an applicant. The tenancy must be for a period of at least 12 months, but the Council will try to secure two-year agreements with

landlords, where possible). The local authority must have arranged the availability of the property to discharge its homelessness duty.

- 3.3.2 Homelessness applicant – This is a person who completes an application to be assessed as homeless. The definition of legally homeless is set out in the 1996 Housing Act. This policy refers to a homelessness applicant as ‘the applicant’.
- 3.3.3 Homelessness Duty – This is a duty on local housing authorities to secure permanent accommodation of unintentionally homeless people in priority need. The duty is set out in *Housing (Homeless Persons) Act 1977* and this policy refers to this as ‘the duty’.

## **SECTION 4. POLICY DETAILS**

### **4.1 Options to Discharge the Council’s Homelessness Duty**

- 4.1.1 Central Bedfordshire Council has the following options available to discharge its duty:
- a) Social housing through a direct let
  - b) Social housing via Choice Based Lettings (CBL)
  - c) Private Sector Offer (available only for applicants that applied after the introduction of this policy)
- 4.1.2 A social housing property is suitable if:
- a) The Council considers the property to be affordable following an assessment of the household’s circumstances,
  - b) It meets the social housing provider’s lettable standard and
  - c) It meets the suitability criteria (see appendix A).
- 4.1.3 A Private Sector Offer (PSO) is suitable if:
- a) The Council considers the property to be affordable following an assessment of the household’s circumstances, (practice guidance will help define how to assess “affordable”).
  - b) The suitability criteria is met (see Appendix A),
  - c) The property is not unsuitable (see Appendix B) and
  - d) The applicant is suitable (see 4.1.4).
- 4.1.4 Officers will consider the following when deciding if to make a PSO:
- a) We would not usually make a PSO if the applicant is considered vulnerable, requires supported accommodation or unlikely to be able to sustain a private rented tenancy. Single vulnerable applicants under 35 years of age that are reliant upon housing benefit will be given particular consideration as they would be restricted to shared accommodation in the private sector.
  - b) We would not make a PSO if the property does not meet the accessibility needs of the household and significant disabled adaptations would be required to make the property suitable.

- c) We would not usually make a PSO if the applicant was previously a social housing tenant and who has fled domestic violence; other violence; or harassment.

## **4.2 Making the offer to discharge the homelessness duty**

- 4.2.1 An offer will be made to the applicant that made the most recent application if a property is equally suitable for two or more applicants. The same PSO property will be offered where possible as a prevention option before an application is made.
- 4.2.2 Applicants that identify a private sector property they wish to move to can only do this once the Council has checked that the property meets the suitability criteria. The application will close and the two-year re-application period (see 4.4) will not apply if the applicant moves to a property not arranged by the Council.
- 4.2.3 The Council will notify the receiving local authority where a suitable PSO is in another area. The receiving authority should receive notification within 14 days (s208 of the Housing Act 1996) of the PSO.
- 4.2.4 Officers will send a letter to the applicant when making an offer, setting out the following:
  - a) that the Council is satisfied that the accommodation is suitable
  - b) the possible consequences of refusal or acceptance
  - c) the right to request a review of the suitability of accommodation
  - d) that the Council has discharged its duty.
- 4.2.5 The application will close if the applicant refuses the property and a review is not requested. The applicant must leave any temporary accommodation where provided.

## **4.3 Right of applicant to request a Review of Property Suitability**

- 4.3.1 The applicant can request a review under s202 of the Housing Act 1996. The review request should be made within 21 days of the offer of accommodation being made. A senior officer or an appointed independent agent not involved in the original decision will conduct the review.
- 4.3.2 The application will continue if it is found that the property was not suitable. A further offer of accommodation will be made when possible.
- 4.3.3 The duty will be discharged and the case closed if it is found that the accommodation was considered to be suitable.

#### **4.4 Right to re-application (PSO only)**

- 4.4.1 If the applicant, who was housed following a PSO, becomes unintentionally homeless again within a two-year period of the initial application, the applicant will not need to complete a new application and the original duty will continue through a re-application application.
- 4.4.2 During the first year of a PSO tenancy, the Council will endeavor to provide some level of support to the applicant to help sustain the tenancy, subject to resources available and competing demand for services. Where appropriate, support services, such as Bromford Support, will be sought to help sustain the tenancy.

### **SECTION 5. LEGAL AND REGULATORY FRAMEWORK**

- 5.1 *Housing (Homeless Persons) Act 1977* – Duty on local housing authorities to secure permanent accommodation of unintentionally homeless people in priority need.
- 5.2 *The Housing Act 1996* - Set out the priority need definition. *The Homelessness (Priority Need for Accommodation) Order 2002* updated this legislation.
- 5.3 *Localism Act 2011* (Part 7, s148 and s149)) – Enabled local authorities to discharge their duty towards homeless households in priority need by using privately rented housing irrespective of whether the household is in agreement with this.
- 5.4 *Supplementary Guidance on the homelessness changes in the Localism Act 2011 and on the Homelessness (Suitability of Accommodation) (England) Order 2012* – explains the changes section 148 and 149 of the Localism Act make to the homelessness legislation
- 5.5 *Homelessness Code of Guidance for Local Authorities (2006)* - the local authority must have regard to the guidance when discharging the duty to the private rented sector. Under this code, local authorities also have a duty to ensure that advice and information about the prevention of homelessness is available free of charge to any person in their local authority area.

### **SECTION 6. EQUALITY AND DIVERSITY**

- 6.1 The potential impact of this policy on the various protected characteristics has been identified and addressed through an Equality Impact Assessment.

### **SECTION 7. MONITORING AND REPORTING ARRANGEMENTS**

- 7.1 Monitoring will be included within the performance framework of the Social Care Health and Housing Directorate. In particular, officers will

monitor the outcomes of PSOs to help assess the success of the policy.

**SECTION 8. INFORMATION AND TRAINING**

- 8.1 Appropriate staff will receive training on the policy principles and the practice guidance prior to implementation of the policy.

**SECTION 9. RESPONSIBILITIES**

- 9.1 The Head of Housing Solutions is responsible for overseeing the delivery and monitoring the impact of the policy.

**SECTION 10. EVALUATION AND REVIEW**

- 10.1 This policy will be reviewed every three years unless a review is required prior to the end of the three-year period.

## Appendix A

### **Suitability of property location for a Private Sector Offer (PSO)**

In determining whether the property location is suitable, Central Bedfordshire Council will consider:

- 1. The significance of any disruption caused by the location from employment, caring responsibilities, or education of the household**
  - 1.1 The PSO location must be within a reasonable travel to work area for employed members of the household. Transport links must be frequent enough to enable this. Employment is usually taken to be at least 16 hours per week. A PSO could still be suitable if it is further away from the place of work than the applicant's current location.
  - 1.2 The location of a PSO will need to be of sufficient proximity to enable an applicant to continue with their caring responsibilities. Officers must verify that the applicant is a carer for another person, who cannot readily withdraw this care without serious detriment to the well-being of the other party.
  - 1.3 If any members of the household attend a special needs school or are undertaking GCSEs or A levels at school (Years 10 to 13), or other proven vital examination, then they should not be required to change schools.
  
- 2. The proximity to and accessibility of medical facilities and other support, which are used by, or essential to the well-being, of the household**
  - 2.1 If the applicant or any member of the household requires specialist medical treatment or support then the location will need to be of sufficient proximity to enable this. The Council will also have regard to other medical treatment or support required by the applicant or any member of the household where health professionals consider that it will be disruptive or detrimental to change provider or location.
  
- 3. The proximity and accessibility to local services, amenities and transport;**
  - 3.1 Regardless of location, the Council will seek to offer a home that is reasonably accessible to local services and amenities, especially for people on low incomes, and those reliant on public transport.
  - 3.2 Due regard will be given to issues related to the Equality Act protected characteristics.

**4. PSO outside the Central Bedfordshire area**

- 4.1 The Council, where reasonably practicable, will seek to offer private sector accommodation within the Central Bedfordshire area, except:
- a) When it considers it beneficial to move the household out of Central Bedfordshire, for example, to reduce the risk of domestic violence, other violence, or harassment; or to assist persons in breaking away from detrimental situations, such as drug or alcohol abuse, or
  - b) When the household requests to move away from Central Bedfordshire, or
  - c) When the applicant consents to move away from Central Bedfordshire, or
  - d) When a person has a very limited / no local connection to Central Bedfordshire (for example, they may have approached having fled violence from another area).
  - e) When moving to a property in a neighbouring local authority will satisfy the suitability criteria set out above.
- 4.2 If a suitable home is not available within Central Bedfordshire, a suitable private sector offer can be made in a neighbouring authority. This location must have reasonable facilities and transport links.



**Appendix B**

**Accommodation unsuitable for a PSO**

Suitability of a property according to the family make up is set out in the Allocations Policy. Supplementary to this, Central Bedfordshire Council will use the following criteria to consider whether a property is unsuitable:

No.	Unsuitability criteria	Evidence
1	The accommodation is not in a <b>reasonable physical condition</b> .	<p>Central Bedfordshire Council officers will either:</p> <ul style="list-style-type: none"> <li>• physically inspect all PSO accommodation before it is offered; or</li> <li>• require a letting agent to physically inspect a property (usually requiring that agent to be a member of a suitable trade body); or</li> <li>• request another local authority or agent to undertake an inspection on its behalf (usually for out-of-area property).</li> </ul> <p>Inspectors will record the condition of the property using broadly similar categories to those used by the Housing Health and Safety Rating System (HHSRS) to ensure consistent quality. Housing staff will usually undertake the inspections, but a qualified HHSRS assessor will carry out a further inspection if possible HHSRS category 1 or more serious category 2 hazards are found.</p>
2	<b>Electrical equipment</b> does not meet the requirements of the Electrical Equipment (Safety) Regs 1994.	<p>All landlords/ agents will be asked to supply a satisfactory Electrical Safety Certificate from within the last five years.</p> <p>Any moveable electrical items in the property will require evidence of a Portable Appliance Test (PAT) within the last year.</p> <p>The inspection of the property will seek to identify any broken fittings or obvious electrical defects, such as loose wiring, or electrical faults.</p>

3	The landlord has not taken reasonable <b>fire safety precautions</b>	<p>The inspection of the property will check that it is fire safe. Landlords should provide working smoke detectors (battery or mains) in all properties. The landlord should provide a copy of a Fire Risk Assessment if there are additional fire safety provisions, e.g. where a building has common parts.</p> <p>All furniture and furnishings supplied by the landlord must also be shown to comply with the Furniture and Furnishings (Fire Safety) Regulations 1988 (as amended).</p>
4	The landlord has not taken reasonable precautions to prevent <b>carbon monoxide poisoning</b>	<p>The Council will provide a carbon monoxide detector if the property has an active gas supply (for heating or cooking) and a recent detector is not supplied by the landlord. The Council will provide appropriate advice and assistance to ensure the detector is fitted properly.</p> <p>Landlords should provide a Gas Safe certificate for gas fires.</p>
5	That there is not a current <b>gas safety record</b> for the property	All landlords/ agents of properties with a gas supply must supply a current Gas Safety Certificate before a letting starts.
6	That the accommodation does not have a valid <b>Energy Performance Certificate (EPC)</b> .	All landlords/ agents should supply a valid EPC Certificate for the property.
7	Where the local housing authority are of the view that <b>the landlord is not a fit and proper person</b> to be a landlord	Private Sector Housing colleagues will check their records for evidence that could indicate whether a landlord or agent is not a 'fit and proper' person.
8	That the accommodation is a <b>House in Multiple Occupation or HMO</b> (inc subject to additional licensing) and is not licensed.	HMO properties are not expected to be used for PSO's. Where they are, Private Sector Housing will check that the property is properly licensed and compliant, particularly in respect of fire safety and management.
9	That the landlord has not provided a <b>written tenancy agreement</b> that the local authority considers adequate.	The Council offers a model Assured Short-hold Tenancy (AST) for landlords to use. Where this is not used, officers will ensure that an acceptable, written AST is used, clearly setting out the tenant's and landlord's obligations, rent and charges, and is free from any unfair or

		<p>unreasonable terms.</p> <p>Officers will also inform landlords of the requirements to use Tenancy Deposit Schemes prior to sign-ups.</p>
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**Appendix B Central Bedfordshire Equality Impact Assessment**

<b>Title of the Assessment:</b>	<b>Discharge of Homelessness Duty in to a Suitable Home Policy</b>	<b>Date of Assessment:</b>	19/02/14
<b>Responsible Officer</b>	<b>Name:</b>	Nick Costin	<b>Extension Number:</b>
	<b>Title:</b>	Head of Housing Solutions	
	<b>Email:</b>	Nick.costin@centralbedfordshire.gov.uk	

**Stage 1 - Setting out the nature of the proposal and potential outcomes.**

<b>Stage 1 – Aims and Objectives</b>	
<b>1.1</b>	<p><b>What are the objectives of the proposal under consideration?</b></p> <p>The Discharge of Homelessness Duty in to a Suitable Home Policy sets out the Council’s approach to discharging its homelessness duty. The policy provides a clear definition of suitable accommodation for discharging its duty to social housing and the private rented sector and implements a power which will increase the availability of properties that can be used to relieve homelessness.</p> <p>The policy will :</p> <ul style="list-style-type: none"> <li>a. enable greater flexibility in bringing the homelessness duty to an end</li> <li>b. use social housing stock to maximum effect with an increase in planned allocation</li> <li>c. reduce the number of people on the housing register</li> <li>d. reduce the use and time spent in expensive temporary accommodation.</li> </ul>
<b>1.2</b>	<p><b>Why is this being done?</b></p> <p>Currently, if an applicant has been accepted by the Council as homeless the applicant will be offered a social housing property once a suitable property becomes available. This is either through a direct let or through Choice Based Lettings following a Housing Register application. The policy introduces an additional route for the applicant to be housed which is an offer for a suitable property in the private sector.</p> <p>Applicants should be housed more quickly due to the increased availability of properties, spend less time in temporary accommodation and more social housing properties can be allocated to those in need making a planned move.</p>
<b>1.3</b>	<p><b>What will be the impact on staff or customers?</b></p> <p>The anticipated greater choice of accommodation could enable households to remain close to a school or family. Homeless acceptances are likely to be provided with a settled home more quickly reducing the length of stay in temporary accommodation.</p> <p>Other households in housing need on the housing register will benefit from an increase in available social housing lets (which would have otherwise been allocated to people owed the homelessness duty).</p> <p>The main potential negative impact on customers is that applicants would no longer be sure of the allocation of social housing to relieve their homelessness. The disadvantage of private rented sector housing compared to social housing is:</p> <ul style="list-style-type: none"> <li>- the quality of accommodation;</li> <li>- poorer access to tenancy sustainment support;</li> </ul>



**Appendix B Central Bedfordshire Equality Impact Assessment**

- higher rents; and
- less security of tenure.

Personal circumstances are taken in to account when considering whether a Private Sector Offer (PSO) would be suitable to reduce the disproportionate effect the above disadvantages can have on vulnerable households. This includes consideration of affordability. The impact of the location of the property is minimised through consideration of access to schooling, employment, caring responsibilities, medical services and other services. A minimum standard of a suitable property is also set out to prevent applicants from living in poor quality housing.

There is no identified impact on staff.

**1.4 How does this proposal contribute or relate to other Council initiatives?**

The Housing Green Paper in 2013 set out the commitment to introduce the private sector offer power.

The policy supplements the Allocations Policy and Homelessness Strategy.

**1.5 In which ways does the proposal support Central Bedfordshire’s legal duty to:**

- Eliminate unlawful discrimination harassment and victimisation and other conduct prohibited by the Act

Applicants considered vulnerable, requiring adaptations to the property due to their disability and those fleeing domestic violence, violence or harassment will be exempt from private sector offers. This will ensure that these groups can receive the support that social housing is typically more readily able to provide. This will also reduce repeat homelessness.

The suitable property criteria provides additional protections for vulnerable households so that they are not placed in poor quality accommodation. Poor housing can have a detrimental effect on the health and well being of households. The risk that homeless households might be placed in unsuitable accommodation will be reduced.

- Advance equality of opportunity between people who share a protected characteristic and people who do not share it

Homeless households should benefit from a reduced length of stay in temporary accommodation (TA). This will reduce stress, frustration and reduce the financial impact as TA typically costs more and ‘living in limbo’ can hamper employment prospects.

The suitable location criteria will protect children from being moved away from a school during important exam years.

Older and disabled people that rely on family and friends delivering care and support will not be detrimentally impacted as homeless households providing this support will be housed within suitable proximity to continue to deliver this support.

Homeless households will not have to make a choice between a home and employment as the criteria takes in to account access to employment.

Applicants with substance misuse problems are unlikely to be placed in a position where they are



**Appendix B Central Bedfordshire Equality Impact Assessment**

forced to choose between an increased risk of relapse and a home by being housed near social networks that could trigger a relapse.

- Foster good relations between people who share a protected characteristic and people who do not share it

Allowing people owed the main homelessness duty to turn down offers of suitable accommodation in the private rented sector and wait for an offer of social housing is unfair:

- to other households on the housing register who have to wait longer to access limited social housing stock; and
- to the taxpayer who is funding expensive temporary accommodation whilst people owed the homelessness duty wait for an offer of social housing.

**1.6 Is it possible that this proposal could damage relations amongst groups of people with different protected characteristics or contribute to inequality by treating some members of the community less favourably such as people of different ages, men or women, people from black and minority ethnic communities, disabled people, carers, people with different religions or beliefs, new and expectant mothers, lesbian, gay, bisexual and transgender communities?**

Applicants that are housed in the private sector may not have the same level of access to tenancy sustainment services that social housing providers provide. To reduce this impact personal circumstances are taken in to account to understand whether a private sector offer would be appropriate. Also during the first year of a PSO tenancy, the Council will endeavor to provide some level of support to the applicant to help sustain the tenancy, subject to resources available and competing demand for services. Where appropriate, support services, such as Bromford Support, will be sought to help sustain the tenancy.

Vulnerable people such as applicants at risk of domestic abuse may be considered for a PSO out of the area so that they can move away from the risk. In these situations the Council may not be able to offer the same tenancy support that the applicant may have had in Central Bedfordshire. Instead the Council would only be able to make the receiving authority aware of the vulnerable person moving in to their area and signpost the applicant to available services.

The engagement activity highlighted a concern that applicants would not be treated as fairly in the private rented sector compared to social housing. It is perceived that private sector tenants would have a lower level of redress if problems developed with the property or the landlord. There is also the concern that outcomes can be different if the tenant chooses to exercise their rights. For example a private sector tenant can enforce their rights to get repairs done, but the landlord may decide not to renew the tenancy agreement at the end of the fixed term.

The suitability criteria does not specifically consider whether the landlord allows pets and the impact this could have on the household. Pets can be important to some applicants, particularly elderly people and rough sleepers who may rely on pets for companionship. The Council is of the view that homelessness is an emergency situation and a suitable property should not be refused if pets cannot be accommodated. This is the policy for Temporary Accommodation and so it is likely that the applicant would have made alternative arrangements prior to the offer. Council Officers will however try and match a household with a pet to a house where the owner allows pets but this might not be possible each time.

Proximity to cultural and faith resources are not specifically considered in the policy, however



**Appendix B Central Bedfordshire Equality Impact Assessment**

under human rights legislation individuals have a right to hold a religious belief but the right to manifest that belief is qualified. Consideration within the policy is given to ensuring that people have access to employment, education, local services, amenities and transport. **Added to this will be 'due regard will be given to issues related to the Equality Act protected characteristics' to take account of access to religion or belief..**

The policy states that the council would not usually make a PSO if the applicant is considered vulnerable. Vulnerability is not defined in the policy. Engagement activity has highlighted that young people are especially vulnerable in private sector accommodation but it is not clear whether young people and care leavers are included in this definition.

**Stage 2 - Consideration of national and local research, data and consultation findings in order to understand the potential impacts of the proposal.**

**Stage 2 - Consideration of Relevant Data and Consultation**

**In completing this section it will be helpful to consider:**

- **Publicity** – Do people know that the service exists?
- **Access** – Who is using the service? / Who should be using the service? Why aren't they?
- **Appropriateness** – Does the service meet people's needs and improve outcomes?
- **Service support needs** – Is further training and development required for employees?
- **Partnership working** – Are partners aware of and implementing equality requirements?
- **Contracts & monitoring** – Is equality built into the contract and are outcomes monitored?

**2.1. Examples of relevant evidence sources are listed below. Please tick which evidence sources are being used in this assessment and provide a summary for each protected characteristic in sections 2.2 and 2.3.**

**Internal desktop research**

	Place survey / Customer satisfaction data		Demographic Profiles – Census & ONS
	Local Needs Analysis	x	Service Monitoring / Performance Information
	Other local research		

**Third party guidance and examples**

x	National / Regional Research		Analysis of service outcomes for different groups
x	Best Practice / Guidance	x	Benchmarking with other organisations
	Inspection Reports		

**Public consultation related activities**

x	Consultation with Service Users		Consultation with Community / Voluntary Sector
x	Consultation with Staff		Customer Feedback / Complaints
	Data about the physical environment e.g. housing market, employment, education and training provision, transport, spatial planning and public spaces		

**Consulting Members, stakeholders and specialists**





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	Elected Members	x	Expert views of stakeholders representing diverse groups
x	Specialist staff / service expertise		

*Please bear in mind that whilst sections of the community will have common interests and concerns, views and issues vary within groups. E.g. women have differing needs and concerns depending on age, ethnic origin, disability etc*

**Lack of local knowledge or data is not a justification for assuming there is not a negative impact on some groups of people. Further research may be required.**

**2.2. Summary of Existing Data and Consultation Findings: - Service Delivery  
Considering the impact on Customers/Residents**

- **Age:** e.g. Under 16 yrs / 16-19 yrs / 20-29 yrs / 30-44 yrs / 45-59 yrs / 60-64 yrs / 65-74 yrs / 75+

**National data:**

In 2009-10 1% of homeless acceptances had priority need because of old age. 7% had priority need because of their young age (16-17year olds and 18-20 year old care leavers).

**Local data:**

16-44 year olds are those that are most affected by homelessness. Four households were classified as vulnerable due to old age (P1E 2012-13).

**The applicant's age when accepted as eligible, unintentionally homeless and in priority need (April 2012 March 2013)**

Age	Count
16 - 24	66
25 - 44	67
45 - 59	20
60 - 64	1
65 - 74	3
75 & Over	2

P1E – 2012/13

66% of homeless households were families with children. This corresponds with national data which found that 68% of homeless acceptances were households with dependant children or included a pregnant woman

**Applicant households found to be eligible for assistance, unintentionally homeless and in priority need during the quarter (analysis by household type)**

	1 child	2 children	3 or more children	All households
Applicant whose household includes dependent children	57	32	16	105
Applicant is, or household includes, a pregnant woman and there are no other dependent children				24
Applicant aged 16 or 17 years old				2
Applicant formerly "in care", and aged 18 to 20 years old				2



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P1E – 2012/13

On average 34 households are in temporary accommodation each month. 22 (64%) of these were households with dependents or a pregnant woman. The average length of stay for households with dependents or a pregnant woman is 19.5 days, 8.3 more days compared to other households.

**Temporary Accommodation**

Measure	April 2013- January 2014
Average per month of households in Temporary Accommodation	34
Average per month of households in Temporary Accommodation (households with dependants / pregnant)	22
Average length of stay in temporary accommodation - Pregnant/dependants households	19.5 days
Average length of stay - all other households	11.2 days

Housing Balanced Scorecard 2013/14

Homeless children living in temporary accommodation are some of the most deprived children in this country, missing out on schooling, on play, and opportunities to develop (Shelter: Living in Limbo 2004).

Cold, damp housing harms children’s health. Children growing up in such conditions are 25% more likely to suffer severe ill-health and disability during childhood or early adulthood. (DCLG, Homelessness (Suitability of Accommodation) (England) Order 2012: Final Stage Impact Assessment, 2012 – from here on referred to as DCLG, 2012)

Good quality accommodation can bring other benefits that can give rise to positive externalities including improved attendance at school and consequent improvements in educational performance and labour market participation. For instance Shelter estimate that 8% of children in sub-standard accommodation miss out on one quarter of all their schooling (DCLG, 2012)

Young people may need additional support to maintain a tenancy due to their inexperience in maintaining a home. Due to the additional tenancy support typically available in social housing, young people may be at higher risk of repeat homelessness in private sector housing.

Older people may also require additional support to sustain their tenancy and may have better outcomes in social housing as this support is more readily available.

The consultation asked ‘In determining the suitability of a PSO, the Council will consider the proximity and accessibility to local services, amenities and transport’. Do you agree with this suitability criteria? 10 responded ‘yes’ and 1 responded ‘no’. 1 respondent provided qualitative feedback regarding this criterion stating that consideration to a person’s age and/or disability should be considered when assessing accessibility.

**- Disability:** e.g. *Physical impairment / Sensory impairment / Mental health condition / Learning disability or difficulty / Long-standing illness or health condition / Severe disfigurement*

**National data:**

In 2009-10 14% of homeless acceptances had a priority need related to a physical disability or



**Appendix B Central Bedfordshire Equality Impact Assessment**

mental illness.

**Homelessness and disability**

Accepted as homeless applicant, or a member of their household is vulnerable as a result of:	2012/13
Physical disability	8
Mental illness or disability	15
Drug dependency	0
Alcohol dependency	0

P1E 2012-2013

Cold, damp housing can increase rates of asthma, respiratory and skin allergies, and other lung diseases. Poor quality housing is linked to physical accidents and injuries, to social and mental effects including depression, isolation, anxiety or aggression. Noise-related stress, exposure to toxins, lead, asbestos or carbon monoxide can have very severe health impact and even more so on those that already have poor health (DCLG, 2012).

Shelter, the housing charity, found that there are high levels of depression associated with homelessness and living in temporary accommodation. Nearly half of parents with children and 71 per cent of childless people reported being depressed. (Shelter, Living in Limbo, 2004).

Overall, half of people who responded to Shelter’s 2004 survey said that their health or their family’s health had suffered due to living in temporary accommodation. People who had been living in temporary accommodation for more than a year were more likely to report damage to their health through living in temporary accommodation. (Shelter, Living in Limbo, 2004).

Frequent moving and disruption associated with living in temporary accommodation makes it difficult for children to keep school places, maintain their attendance and do well at school. Two fifths of parents (43 per cent) reported that their children had missed school due to their housing situation. On average, children had missed 55 days of school equivalent to quarter of the school year. One in ten parents (11 per cent) said that at least one of their children did not have a school place at all for the term. Parents also said their children had long journeys to school and had problems with transport. (Shelter, Living in Limbo, 2004).

The trauma of becoming homeless and stresses associated with living in temporary accommodation affect children’s mental and emotional well being. Over two fifths (42 per cent) of parents said that their child was ‘often unhappy or depressed’. Children also experienced a lot of problems at school including bullying and behavioural problems. One in ten parents (11 per cent) said that their child had been given a statement of Special Educational Needs and one in ten said their child had been suspended, excluded or expelled from school. (Shelter, Living in Limbo, 2004).

**- Carers:** *A person of any age who provides unpaid support to family or friends who could not manage without this help due to illness, disability, mental ill-health or a substance misuse problem*

Over 2 million people become carers every year (Carers UK). Every day, another six thousand people take on a caring responsibility and 3 in 5 people will become a carer at some point in their lives. By 2026 more than 10% of the population will be over 75 and significant numbers of the workforce age 45+ will have caring responsibilities.



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Valuing Carers 2011 estimates that the economic value of the contribution made by carers in the UK is around £119 billion per year. This is 37% higher than an estimate made in 2007.

**- Gender Reassignment:** *People who are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex*

**- Pregnancy and Maternity:** *e.g. pregnant women / women who have given birth & women who are breastfeeding (26 week time limit then protected by sex discrimination provisions)*

24 homelessness acceptances were households that included a pregnant woman and no other dependent children in 2012/13 (P1E – 2012/13).

On average 22 households with dependents or a pregnant woman are in temporary accommodation each month. The average length of stay for households with dependents or a pregnant woman is 19.5 days, 8.3 more days than other households.

Cold, damp housing harms children’s health and can contribute to post-natal depression in mothers. The development of babies and young children in poor housing conditions can be significantly affected. (DCLG, 2012).

A suitable proximity to ante natal services will be important for pregnant women to ensure consistency in care.

**- Race:** *e.g. Asian or Asian British / Black or Black British / Chinese / Gypsies and Travellers / Mixed Heritage / White British / White Irish / White Other*

**National data:**

In 2009-10 14% of homeless acceptances were Black or Black British, 7% were Asian or Asian British, 3% were mixed and 45 Chinese or other.

**Ethnicity of homelessness acceptances 2012-13**

	White	Black	Asian	Mixed	Other
Numbers accepted as being homeless and in priority need	145	7	2	5	0

Table 784: Local authorities' action under the homelessness provisions of the Housing Acts: financial year 2012/13

Ethnic minority households are more likely to live in rented accommodation and flats, and about a quarter are living in pre-1919 homes, many of which are in a poor condition. (Race Equality Foundation 2014). In particular black, Pakistani and Bangladeshi households are more likely to live in homes that fall below the Decent Homes Standard than white households. (Department for Communities and Local Government)



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Housing services are usually tailored to the needs of different clients, but this is rarely the case for Gypsies and Irish Travellers. Many authorities recognise that they would rather live on sites, but since there are not enough of these, they do little to make the accommodation they can provide more suitable, for example by providing tenancy support to those who have recently moved from sites. As a result many Gypsies and Irish Travellers find it difficult to keep up their tenancies, leading to a cycle of eviction, from housing to homelessness and unauthorised encampments, and to eviction again. (CRE)

Overall black and minority ethnic people are more likely to be unemployed, irrespective of their qualifications, place of residence, sex or age. They are less likely to hold senior management positions. (Equality Review (ER)) A property that prohibits access to current employment could therefore have a more significant impact than on White British people.

In 2006 at GCSE 5+A\*-C, pupils from of African, African-Caribbean, Bangladeshi and Pakistani backgrounds achieved below national averages. Disrupting education with a school move could therefore have a more detrimental impact on these groups.

**- Religion or Belief:** e.g. *Buddhist / Christian / Hindu / Jewish / Muslim / Sikh / No religion / Other*

A lack of awareness about a person’s religious or other beliefs can lead to discrimination. This is because religion can play a very important part in the daily lives of people and access to cultural and faith resources may be of significant importance.

**- Sex:** e.g. *Women / Girls / Men / Boys*

**National data:**

In 2009-10 45% of homeless acceptances were lone parent households with a female applicant and a further 12% were single female applicants.

Two applicants were accepted as homeless as a result of fleeing domestic violence in 2012-13 (P1E – 2012/13).

Lone parents that are female are significantly more likely to be accepted as homeless than male lone parents, but single men are more likely to be accepted than single women.

**Applicant households found to be eligible for assistance, unintentionally homeless and in priority need**

Couple with dependent children*	Lone parent household with dependent children		One person household		All other household groups
	Male Applicant	Female Applicant*	Male Applicant	Female Applicant	
37	7	82	20	6	7

\* include expectant mothers with no other dependent children

Source: P1E 2012-13



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- **Sexual Orientation:** e.g. *Lesbians / Gay men / Bisexuals / Heterosexuals*

Data is not collected on the sexual orientation of homeless applicants.

When parents are very hostile to young lesbian and gay people, some feel forced to leave home even though they may become homeless as a result. The main cause of homelessness in Central Bedfordshire is eviction by parents who are no longer willing to accommodate them (CBC Housing Green Paper 2011/12).

One in five lesbian and gay people expect to be treated worse than heterosexuals when applying for social housing.

- **Other:** e.g. *Human Rights, Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion, Marriage and Civil Partnership*

Tenants in private rented accommodation are 50% more at risk of carbon monoxide poisoning than both home owners and social housing tenants. It is likely that this risk will be more starkly reflected in poor quality private rented sector accommodation. According to the Chief Medical Officer for England (2011), Carbon Monoxide poisoning causes 50 deaths and hospitalises 200 people a year, and also sends 4,000 people to A&E (DCLG, 2012).

**2.3. Summary of Existing Data and Consultation Findings – Employment  
Considering the impact on Employees**

- **Age:** e.g. *16-19 / 20-29 / 30-39 / 40-49 / 50-59 / 60+*

- **Disability:** e.g. *Physical impairment / Sensory impairment / Mental health condition / Learning disability or difficulty / Long-standing illness or health condition / Severe disfigurement*

- **Carers:** e.g. *parent / guardian / foster carer / person caring for an adult who is a spouse, partner, civil partner, relative or person who lives at the same address*

- **Gender Reassignment:** *People who are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex*

- **Pregnancy and Maternity:** e.g. *Pregnancy / Compulsory maternity leave / Ordinary maternity leave / Additional maternity leave*

- **Race:** e.g. *Asian or Asian British / Black or Black British / Chinese / Gypsies and Travellers / Mixed Heritage / White British / White Irish / White Other*





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- **Religion or Belief:** e.g. *Buddhist / Christian / Hindu / Jewish / Muslim / Sikh / No religion / Other*

- **Sex:** *Women / Men*

- **Sexual Orientation:** e.g. *Lesbians / Gay men / Bisexuals / Heterosexuals*

- **Other:** e.g. *Human Rights, Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion, Marriage and Civil Partnership*

**2.4. To what extent are vulnerable groups more affected by this proposal compared to the population or workforce as a whole?**

The Government identified in its EIA of the Homelessness duty that:

*“The priority given to certain groups of young people and people who are disabled or mentally ill (who are considered most vulnerable and likely to suffer hardship if not secured accommodation), combined with the fact that households that include a pregnant woman or a dependant child are considered to have a priority need for accommodation under the homelessness legislation, means that women, pregnant women, young people and children, and disabled people are more likely to be affected by any change in the way that the main homelessness duty can be fully discharged. People from black and minority ethnic communities are also more likely to be affected because they are over-represented among homeless acceptances (compared to the general population).”*

**2.5. To what extent do current procedures and working practices address the above issues and help to promote equality of opportunity?**

Those at most risk of tenancy failure will not be considered suitable for a private sector offer. We would therefore not usually make a PSO if the applicant is considered vulnerable, requires supported accommodation or is considered unlikely to be able to sustain a private rented tenancy.

We would not usually make a PSO if the applicant or a member of their household requires significant disabled adaptations to make the property suitable.

We would not usually make a PSO if the applicant was previously a social housing tenant and who has fled domestic violence; other violence; or harassment.

- To mitigate concerns about reduced security of tenure in the private rented sector, legislation put additional protection in place such as a minimum fixed term tenancy of at least 12 months. Moreover, the duty will recur if the applicant becomes homeless again within two years of accepting the private rented sector offer, through no fault of their own, regardless of whether they still have a priority need for accommodation. The Council is also looking to develop an information pack outlining expectations of tenants and landlords to ensure that there is transparency and availability of information.

The Central Bedfordshire policy states that the Council will try to secure two-year agreements with landlords, where possible.



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The suitability decision can be reviewed on request by the applicant.

A property will not be suitable if:

- Significant disruption will be caused to employment, caring responsibilities, or education of the household.
- There is insufficient proximity to and accessibility of medical facilities and other support, which are used by, or essential to the well-being, of the household will also be taken into account.
- The proximity and accessibility to local services, amenities and transport is not adequate.
- The accommodation is not in a reasonable physical condition and does not meet minimum standards set out in the policy.

During the first year of a PSO tenancy, the Council will endeavor to provide some level of support to the applicant to help sustain the tenancy, subject to resources available and competing demand for services. Where appropriate, support services, such as Bromford Support, will be sought to help sustain the tenancy.

**2.6. Are there any gaps in data or consultation findings**

Wider views on the policy have not been sought on the impact of the policy.

**2.7. What action will be taken to obtain this information?**

Formal consultation will be carried out on the policy in March 2014.

**Stage 3 - Providing an overview of impacts and potential discrimination.**

**Stage 3 – Assessing Positive & Negative Impacts**

Analysis of Impacts	Impact?		Discrimination?		Summary of impacts and reasons
	(+ve)	(- ve)	YES	NO	
<b>3.1 Age</b>	*			*	Young people and older people may have poorer outcomes in a private sector property due to higher risks of tenancy failure. However personal circumstances are considered in PSOs and tenancy support is available.
<b>3.2 Disability</b>	*			*	Accessibility requirements will be considered before accommodation is offered to ensure that the property is suitable.
<b>3.3 Carers</b>	*			*	Applicants with caring responsibilities will be housed in reasonable proximity to the cared for person.





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<b>3.4 Gender Reassignment</b>	*			*	Increased availability of properties will lead to a faster homelessness solution reducing the need for TA.
<b>3.5 Pregnancy &amp; Maternity</b>				*	Temporary accommodation (TA) and poor accommodation can have negative outcomes on pregnant women and those who have recently given birth. The policy will reduce the need/length of TA use and ensure that accommodation is appropriate.
<b>3.6 Race</b>	*			*	Increased availability of properties will lead to a faster homelessness solution reducing the need for TA.
<b>3.7 Religion / Belief</b>	*			*	
<b>3.8 Sex</b>	*			*	Increased availability of properties will lead to a faster homelessness solution reducing the need for TA.
<b>3.9 Sexual Orientation</b>	*			*	Increased availability of properties will lead to a faster homelessness solution reducing the need for TA.
<b>3.10 Other e.g. Human Rights, Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion Marriage and Civil Partnership</b>				*	

**Stage 4 - Identifying mitigating actions that can be taken to address adverse impacts.**

<b>Stage 4 – Conclusions, Recommendations and Action Planning</b>	
<b>4.1 What are the main conclusions and recommendations from the assessment?</b>	<p>The introduction of private sector offers will increase the supply of housing for homeless households. This will mean that households will spend less time in temporary accommodation. Other households in housing need on the housing register will benefit from an increase in available social housing lets.</p> <p>Private sector housing can have a number of disadvantages compared to social housing such as poorer quality of housing, poor access to tenancy sustainment support, higher rent and less security of tenure. The policy will mitigate these disadvantages by checking the suitability of a property against the following factors:</p> <ul style="list-style-type: none"> <li>- Vulnerability</li> <li>- Disability</li> </ul>



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<ul style="list-style-type: none"> <li>- Affordability</li> <li>- the significance of any disruption caused by the location from employment, caring responsibilities, or education of the household</li> <li>- the proximity to and accessibility of medical facilities and other support, which are used by, or essential to the well-being, of the household</li> <li>- the proximity and accessibility to local services, amenities and transport</li> <li>- PSO outside the Central Bedfordshire area</li> <li>- suitability of property</li> </ul>																							
<p><b>4.2 What changes will be made to address or mitigate any adverse impacts that have been identified?</b></p> <p>No changes are required.</p>																							
<p><b>4.3 Are there any budgetary implications?</b></p> <p>No adverse implications. If the policy can reduce bed and breakfast use, there may be a positive implication.</p>																							
<p><b>4.4 Actions to be taken to mitigate against any adverse impacts:</b></p> <table border="1"> <thead> <tr> <th>Action</th> <th>Lead Officer</th> <th>Date</th> <th>Priority</th> </tr> </thead> <tbody> <tr> <td>Consult stakeholders on the policy to check that the criteria will not lead to any adverse impacts.</td> <td>Jo Burnham</td> <td>03/03/14</td> <td>H</td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>				Action	Lead Officer	Date	Priority	Consult stakeholders on the policy to check that the criteria will not lead to any adverse impacts.	Jo Burnham	03/03/14	H												
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**Stage 5 - Checking that all the relevant issues and mitigating actions have been identified**

<p><b>Stage 5 – Quality Assurance &amp; Scrutiny:</b> <b>Checking that all the relevant issues have been identified</b></p>	
<p><b>5.1 What methods have been used to gain feedback on the main issues raised in the assessment?</b></p> <p>Two stakeholder engagement events were held in February 2014 to gather views from members of staff and customers that may be affected by the changes such as homelessness applications and Housing Register applicants.</p> <p>A formal consultation ran for 4 weeks in March 2014. 11 responses were received.</p>	
<p><b>Step 1:</b></p>	
<p><b>Has the Corporate Policy Advisor (Equality &amp; Diversity) reviewed this assessment and provided feedback? Yes</b></p>	
<p><b>Summary of CPA’s comments:</b></p>	
<p> </p>	



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I support the findings and issues highlighted in the EIA. Additional national data and conclusions drawn from the Government's EIA has been added by way of comparison in sections 2.1 and 2.4. I would recommend further consideration of the following issues:

- The Government identified in its EIA of the Homelessness Duty that individual applicants will be able to appeal against decisions by local authorities if they believe that the offer of accommodation is not suitable (through the courts as per other decisions under homelessness legislation). The policy does not highlight that applicants are able to appeal a decision or provide information as to how this should be done. It is recommended that this is included for the sake of transparency. Comments: The policy does include a section outlining the 'Right of applicant to request a Review of Property Suitability'. Section 4.3 of version 0.6 of the policy explains that *the applicant can request a review under s202 of the Housing Act 1996. The review request should be made within 21 days of the offer of accommodation being made. A senior officer or an appointed independent agent not involved in the original decision will conduct the review. The application will continue if it is found that the property was not suitable. A further offer of accommodation will be made when possible. The duty will be discharged and the case closed if it is found that the accommodation was considered to be suitable.* Section 4.2 of the v0.6 policy sets out how clients are informed of this right: *Officers will send a letter to the applicant when making an offer, setting out the following [...] the right to request a review of the suitability of accommodation [...].*
- There is evidence that highlights that social isolation can have negative health impacts on elderly people and that pets can help :

*The support older people want and the services they need Joseph Rowntree Foundation. Pets were cited as a source of pleasure and of company, but as a source of some anxiety if people thought they should talk about problems in the discussions. They described some of the responsibilities, generally foreseeable, arising from pet ownership, such as meeting the cost of vets' bills and, in the case of dogs, being able to exercise them.*

Given the low numbers of elderly people and homelessness applications, perhaps an exception could be considered on a case by case basis in relation to pets and vulnerable older people? Comments: The first priority for households accepted as priority homeless will be to find a roof over their heads. This may mean that accommodation where pets are allowed will be a secondary matter. Council officers will try and match a household with a pet to a house where the owner allows pets but this might not be possible each time.

- It also recommended that consideration is given to the needs of people who have guide dogs and assistance dogs (rather than pets) and how this would impact on the way in which the duty is discharged. Comments: Applicants that need assistance dogs will be considered vulnerable and so will not be made a PSO. Further details on this will be included in the good practice guidance.
- Under human rights legislation individuals have a right to hold a religious belief but the right to manifest that belief is qualified. The Equality Act also protects people with no religious and other beliefs (e.g. Athesim Humanism, climate change etc.). Consideration within the policy is given to ensuring that people have access to employment, education, local services, amenities and transport and this may provide sufficient consideration. Given the largely rural nature of the Central Bedfordshire area it could potentially be argued that it will not be reasonably practicable to build very wide ranging additional



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considerations into the policy. Comments: Under 'The proximity and accessibility to local services, amenities and transport' in Appendix B of the policy the following will be added 'due regard will be given to issues related to the Equality Act protected characteristics'.

- The policy states that the council would not usually make a PSO if the applicant is considered vulnerable. It may be helpful to include a definition of vulnerability. The Officer for Voluntary Organisations for Children, young people & families has recently contacted me to highlight that currently there is no mention of young people in relation to the local authority legal duty, or a mention of their vulnerability with regard to the private sector offer. Comments: This has been included in section 1.6 as an area for potential improvement and the definition of vulnerability will be defined in the practice guidance.

**Step 2:**

**5.2 Feedback from Central Bedfordshire Equality Forum 27 March 2014**

Members highlighted the following issues:

- The suitability criteria is really important in helping to ensure that people are placed in appropriate and safe accommodation.
- Emphasis was placed on the importance of checking that the landlord is a fit and proper person
- The effectiveness of energy performance certificates was queried. The use of sub-meters within properties by landlords can mean that fuel bills for individual tenants are substantial, impacting adversely upon the actual affordability of the property.
- The issue of guide and assistance dogs was considered. Landlords will be covered by the Equality Act and so will be subject to indirect discrimination legislation and also provisions relating to discrimination arising from disability. Blind / partially sighted people are likely to be viewed as vulnerable and so may be less likely to be subject to this provision. The issue of retired working dogs was highlighted as they often continue to reside with their owner.
- In considering the Equality Act it was also recognised that landlords will not be able to turn down an individual on the basis of a protected characteristic.
- The Forum debated whether any Equality Act contractual implications were created between the council and the landlord in relation to the delivery of public services but it was noted that the tenancy agreement is between the landlord and the individual.
- The issue of access to faith facilities was considered. It was felt that there should not be a blanket exclusion of this issue and that it should be considered as part of the broad range of suitability factors that are considered. It was suggested that Page 8 Appendix B - suitability of property location could be updated at item three to highlight that due regard will be given to issues related to the Equality Act protected characteristics.

**5.3 Feedback from Child Poverty Meeting – 11 March 2014**

Attendees at the meeting expressed the following views:

- There is a need to ensure that debt advisers support tenants because there is a risk that people may go into the private sector and then experience increasing levels of debt. There is a need to consider how people in difficulty can be signposted to support such as that provided by Bromford.
- When identifying out of area placements there is a real need to ensure that roots in a



**Appendix B Central Bedfordshire Equality Impact Assessment**

particular locality have been fully considered and the importance of strong networks such as provision of childcare by grandparents are not overlooked.

- Concern was expressed that rent in the private sector can be significantly higher and so checks on affordability will be particularly crucial.
- Good access to local sources of employment is important to consider when identifying suitable placements. The Council shouldn't place individuals in areas where it will be hard to find work.
- Concern was expressed that the policy might provide a short term fix but that families will come back to the council needing help further down the line.

The meeting was informed that individuals would still be able to apply to the housing register and the process will help reduce queue jumping,

- There was agreement that the needs of family experiencing domestic abuse required special consideration.

**Stage 6 - Ensuring that the actual impact of proposals are monitored over time.**

**Stage 6 – Monitoring Future Impact**

**6.1 How will implementation of the actions be monitored?**

The actions will be monitored by the Head of Housing Solutions.

**6.2 What sort of data will be collected and how often will it be analysed?**

The Council collects data for the Government's P1E statistical returns. This enables us to monitor how many households are accepted as homeless and offered accommodation in the private rented sector (and monitor any corresponding reductions in households in temporary accommodation). P1E data also tell us the types of household who are being accepted as homeless.

In addition to this, data will be collected on the incidences where the duty has recurred because the applicant has become homeless again within two years of accepting the private rented sector offer, through no fault of their own. This will enable us to monitor the volume of re-applications within two years of the duty being ended with a private sector offer.

**6.3 How often will the proposal be reviewed?**

The policy will be reviewed every three years unless a review is required earlier.

**6.4 Who will be responsible for this?**

Head of Housing Solutions.

**6.5 How have the actions from this assessment been incorporated into the proposal?**

Actions will be incorporated following the development of the final draft of the policy once



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consultation results have been reviewed. This is anticipated to be May 2014.

**Stage 7 - Finalising the assessment.**

**Stage 7 – Accountability / Signing Off**

**7.1 Has the lead Assistant Director/Head of Service been notified of the outcome of the assessment**

Name: \_\_\_\_\_ Date: \_\_\_\_\_

**7.2 Has the Corporate Policy Adviser Equality & Diversity provided confirmation that the Assessment is complete?**

Date: \_\_\_\_\_

**Appendix C**



## **Draft Discharge of the Homelessness Duty to a Suitable Home Policy**

**Response to Formal Consultation**

## **1. INTRODUCTION**

- 1.1 The Localism Act, 2011, provides a power to local authorities to discharge the homelessness duty to the private rented sector without consent of new homeless applicants from 9<sup>th</sup> November 2012. Local authorities can discharge their duties through securing suitable, available accommodation for the household. The accommodation can either be social housing or a property in the private rented sector.
- 1.2 Statutory regulations require local authorities to take a number of matters into account in determining the suitability of accommodation. The Council's suitability criteria that it proposes to consider when discharging its homelessness duty to the private rented sector are set out in the draft Discharge of the Homelessness Duty to a Suitable Home Policy.
- 1.3 This power will only be exercised by Central Bedfordshire Council following final agreement of its Discharge of the Homelessness Duty to a Suitable Home Policy. Homelessness applicants who apply or who have applied before the policy approval date will not have a private sector offer (PSO).
- 1.4 Central Bedfordshire Council formally consulted on the suitability criteria set out in the draft Discharge of the Homelessness Duty to a Suitable Home Policy for 4 weeks from 3<sup>rd</sup> March to 28<sup>th</sup> March 2014.
- 1.5 The consultation was managed via a formal consultation document. This was available in paper format; downloadable from the CBC website, or was obtainable by telephoning or writing to the contact details provided in the letters to prospective housing register applicants.
- 1.6 Additional feedback was also obtained via stakeholder engagement events held on 10<sup>th</sup> and 13<sup>th</sup> February 2014 where prospective tenants, hostel and temporary accommodation residents, staff, Registered Social Landlords and private sector landlords were invited to comment on the suitability criteria in the draft Discharge of the Homelessness Duty to a Suitable Home Policy. See Appendix 3 for full details of feedback from these events.

## **2. RESULTS OF CONSULTATION: DEMOGRAPHIC PROFILE**

- 2.1 In total, 11 people responded to the suitability criteria in the draft Discharge of the Homelessness Duty to a Suitable Home Policy consultation.
- 2.2 18% of respondents were residents within Central Bedfordshire currently homeless or at risk of homelessness and are housing register applicants, 9% were housing register applicants, 9% were homeless or at risk of homelessness and 55% of applicants were residents within Central Bedfordshire.



- 2.3 45% of respondents were male, 45% were female and 9 % preferred not to say.
- 2.4 27% of respondents were aged 55 years or over.
- 2.5 18% of respondents stated that they had a disability.
- 2.6 64% of respondents stated that they were heterosexual.
- 2.7 73% of respondents were White: British, 9% were White: Other, 9% preferred not to say and 9% did not respond.
- 2.8 55% of respondents' stated their religion or belief was Christian and 27% of respondents stated they had no religion or belief.
- 2.9 Appendix 2 provides a full demographic statistical profile of respondents.

**3. RESULTS OF CONSULTATION: QUESTION RESPONSES**

The formal consultation was designed to capture both quantitative and qualitative data from respondents, with results summarised as follows:

- 3.1 Q1. In determining the suitability of a Private Sector Offer (PSO), the Council will consider disruption caused by the location from employment, caring responsibilities, or education of the household.**

**Do you agree with this suitability criteria?**

Yes	11	100%
No	0	0%
Don't Know	0	0%

11 respondents (100% of respondents) agreed with this proposal. No additional qualitative feedback was received.

- 3.2 Q2. In determining the suitability of a PSO, the Council will consider the proximity and accessibility to medical facilities and other support which are used by, or essential to the well-being, of the household.**

**Do you agree with this suitability criteria?**

Yes	10	91%
No	1	9%
Don't Know	0	0%

10 respondents (91%) agreed with the proposal. 1 respondent (9%) did not support this proposal but did not provided qualitative feedback.

**3.3 Q3. In determining the suitability of a PSO, the Council will consider the proximity and accessibility to local services, amenities and transport.**

**Do you agree with this suitability criteria?**

Yes	10	91%
No	1	9%
Don't Know	0	0%

10 respondents (91%) agreed with the proposal. 1 respondent (9%) provided qualitative feedback regarding this criterion stating that consideration to a person's age and/or disability should be considered when assessing accessibility.

**3.4 Q4. In determining the suitability of a PSO outside the Central Bedfordshire area the Council will consider the reduction in the risk of domestic violence, other violence, or harassment; or to assist persons in breaking away from detrimental situations, such as drug or alcohol abuse.**

**Do you agree with this suitability criteria?**

Yes	10	91%
No	1	9%
Don't Know	0	0%

10 respondents (91%) agreed with the proposal. 1 respondent (9%) provided qualitative feedback regarding offering additional support to people effected by drug or alcohol abuse.

**3.5 Q5. In determining the suitability of a PSO outside the Central Bedfordshire area the Council will consider a persons' very limited / no local connection to Central Bedfordshire (for example, they may have approached the Council having fled violence from another area).**

**Do you agree with this suitability criteria?**

Yes	10	91%
No	1	9%
Don't Know	0	0%

10 respondents (91%) agreed with the proposal. 1 respondent (9%) provided qualitative feedback suggesting that prospective tenants fleeing domestic violence could be given higher priority for suitable housing.

- 3.6 Q6. In determining the suitability of a PSO outside the Central Bedfordshire area the Council will consider the suitability criteria as set out in questions 1 to 5 above.**

**Do you agree with this suitability criteria?**

Yes	11	100%
No	0	0%
Don't Know	0	0%

All respondents agreed with this criterion. No additional comments were made.

- 3.7 Q7. If suitable accommodation is not available within Central Bedfordshire, a suitable private sector offer can be made in a neighbouring authority. This location must have reasonable facilities and transport links.**

**Do you agree with this suitability criteria?**

Yes	8	72%
No	3	27%
Don't Know	0	8%

8 respondents (72% of respondents) support this proposal.  
2 respondents, (18% of respondents), provided qualitative feedback that questioned what is reasonable and the equality support provided to people wishing to stay within Central Bedfordshire

- 3.8 Q8. PSO accommodation will be deemed unsuitable where the local housing authority are of the view that the accommodation is not in a reasonable physical condition.**

**Do you agree with this suitability criteria?**

Yes	11	100%
No	0	0%
Don't Know	0	0%

100% of respondents agree with this criterion. 1 respondent provided qualitative feedback stating that accommodation should be fit for purpose.

- 3.9 Q9. PSO accommodation will be deemed unsuitable where the local housing authority is of the view that any electrical equipment does not meet the requirements of the Electrical Equipment (Safety) Regulations 1994.**

**Do you agree with this suitability criteria?**

Yes	11	100%
No	0	0%
Don't Know	0	0%

All respondent agree with this criterion. 2 respondents (18%) provided qualitative feedback that assessments should be made by professionals and that minor repairs could be undertaken to meet the standard.

**3.10 Q10. PSO accommodation will be deemed unsuitable where the local housing authority are of the view that the landlord has not taken reasonable fire safety precautions.**

**Do you agree with this suitability criteria?**

Yes	11	100%
No	0	0%
Don't Know	0	0%

All respondent agree with this, 2 have provided qualitative feedback that reasonable precautions should be listed and landlords' could be given time to comply with regulations.

**3.11 Q11. PSO accommodation will be deemed unsuitable where the local housing authority are of the view that the landlord has not taken reasonable precautions to prevent carbon monoxide poisoning.**

**Do you agree with this suitability criteria?**

Yes	10	91%
No	1	9%
Don't Know	0	0%

10 respondents (91% of respondents) agree with this criterion, 1 of those respondents has also provided qualitative feedback that reasonable precautions could be expensive therefore impacting on the rental costs.

**3.12 Q12. PSO accommodation will be deemed unsuitable that there is not a current gas safety record for the property.**

**Do you agree with this suitability criteria?**

Yes	10	91%
No	1	9%
Don't Know	0	0%

10 respondents (91% of respondents) agree with this criterion, 1 of those respondents has also provided qualitative feedback questioning if gas will be in properties.

**3.13 Q13. PSO accommodation will be deemed unsuitable that the accommodation does not have a valid Energy Performance Certificate (EPC).**

**Do you agree with this suitability criteria?**

Yes	7	64%
No	4	36%
Don't Know	0	0%

7 respondents (64% of respondents) agree with this criterion. 4 respondents who disagreed with this also provided qualitative feedback questioning the relevance of energy performance within otherwise suitable properties.

**3.14 Q14. PSO accommodation will be deemed unsuitable where the local housing authority are of the view that the landlord is not a fit and proper person to be a landlord.**

**Do you agree with this suitability criteria?**

Yes	11	100%
No	0	0%
Don't Know	0	0%

11 respondents (100% of respondents) agreed with this proposal. No additional qualitative feedback was received.

**3.15 Q15. PSO accommodation will be deemed unsuitable where the accommodation is a House in Multiple Occupation or HMO (including subject to additional licensing) and is not licensed.**

**Do you agree with this suitability criteria?**

Yes	11	100%
No	0	0%
Don't Know	0	0%

11 respondents (100% of respondents) agreed with this proposal. No additional qualitative feedback was received.

**3.16 Q16 PSO accommodation will be deemed unsuitable where the landlord has not provided a written tenancy agreement that the local authority considers to be adequate.**

**Do you agree with this suitability criteria?**

Yes	10	91%
No	1	9%
Don't Know	0	0%

10 respondents (91% of respondents) agree with this criterion.  
1 respondent has also provided qualitative feedback suggesting that a free of charge template tenancy agreement be provided to landlords.

**3.17 Q17. Overall, have we got the proposed suitability criteria right?**

Yes	11	100%
No	0	0%
Don't Know	0	0%

All respondents support the suggested criterion, 1 respondent has suggested the use of "unsuitable" accommodation on a temporary fixed term basis until it meets the suitability criteria.

**4. SUMMARY**

4.1 In summary, the 11 respondents were in support of the suitability criteria put forward in the formal consultation.

Whilst there was support for the proposed criteria being fair and welcome, the consultation raised some suggestions from respondent for inclusion within the draft Discharge of the Homelessness Duty to a Suitable Home Policy and/or criteria to provide more clarity on requirements for landlords to be able to provide suitable accommodation for prospective tenant(s).

At the engagement events there was support for the Suitability Criteria within the Policy as it provided more housing options for tenants, questions were also raised by landlords around the possible financial implications in meeting the standard to allow for them to let properties to tenants affected by this proposal and what incentives may be on offer to meet this.

Both tenants and landlords questioned what, if any, on-going support would be provided to both parties to ensure that tenancies can be maintained.

Full details of comments received through the consultation are provided in Appendix 1 and full feedback received from the Stakeholder Engagement Events in Appendix 3 & 4.

**Appendix 1: Results of Consultation: Qualitative Feedback**

**Q1. In determining the suitability of a Private Sector Offer (PSO), the Council will consider disruption caused by the location from employment, caring responsibilities, or education of the household.**

**Do you agree with this suitability criteria?**

No comments received

**Q2. In determining the suitability of a PSO, the Council will consider the proximity and accessibility to medical facilities and other support which are used by, or essential to the well-being, of the household.**

**Do you agree with this suitability criteria?**

No comments received

**Q3. In determining the suitability of a PSO, the Council will consider the proximity and accessibility to local services, amenities and transport.**

**Do you agree with this suitability criteria?**

It all depends what is proximity, short walk or a short bus journey is acceptable, as long as they're not disabled or old.

**Officer response – all of these aspects will be considered by Officers when considering suitability of location.**

**Q4. In determining the suitability of a PSO outside the Central Bedfordshire area the Council will consider the reduction in the risk of domestic violence, other violence, or harassment; or to assist persons in breaking away from detrimental situations, such as drug or alcohol abuse.**

**Do you agree with this suitability criteria?**

You need more than this for me to give a meaningful opinion. In principle of course I will agree but who could really disagree? Being away from sources of drink and drugs will never be 100% and the person will still need help. These addictions are the symptoms of something bigger, not always the cause. If you are paying housing benefit direct to the claimant, they will be tempted to waste it. It is better (albeit not the done thing now) to pay the money direct to the landlord and help the recipient with a deposit.

**Officer response – the ability to pay benefits, in particular Housing Benefit, directly to the landlord is not something that is within the realm of**



**this policy. The concern is recognised and it is in the Council's interest also that the tenancy is sustained. It is intended that tenants are supported to help sustain their tenancies, perhaps through agencies like Bromford Support.**

- Q5. In determining the suitability of a PSO outside the Central Bedfordshire area the Council will consider a persons' very limited / no local connection to Central Bedfordshire (for example, they may have approached the Council having fled violence from another area).**

**Do you agree with this suitability criteria?**

In this example, where the person is vulnerable, and this authority is deemed as suitable, then the application should actually be ranked higher.

**Officer response – agreed, each case will be considered on its merits and risks to clients as to what is considered suitable.**

- Q6. In determining the suitability of a PSO outside the Central Bedfordshire area the Council will consider the suitability criteria as set out in questions 1 to 5 above.**

**Do you agree with this suitability criteria?**

No comments received

- Q7. If suitable accommodation is not available within Central Bedfordshire, a suitable private sector offer can be made in a neighbouring authority. This location must have reasonable facilities and transport links.**

**Do you agree with this suitability criteria?**

This is too woolly a definition, what does reasonable mean?

**Officer response – reasonable facilities are those required for normal day to day living and include considerations mentioned elsewhere in the draft policy. What the policy proposes is that where all other suitability criteria are met, a property in a neighbouring authority would be considered.**

While as you have said some will want to leave or flee and area, we must be asking questions why we can provide facilities for travellers for instance yet someone who wants to stay in an area and build a stable life is being shipped out.

**Officer response – where possible, suitable properties within Central Bedfordshire will be offered first. There will be times, however, when a suitable affordable property in a neighbouring area provides the**

**same (or sometimes a better) option than what is available within Central Bedfordshire.**

- Q8. PSO accommodation will be deemed unsuitable where the local housing authority is of the view that the accommodation is not in a reasonable physical condition.**

**Do you agree with this suitability criteria?**

It must be fit for basic purpose.

**Officer response – This is policy intention**

- Q9. PSO accommodation will be deemed unsuitable where the local housing authority is of the view that any electrical equipment does not meet the requirements of the Electrical Equipment (Safety) Regulations 1994.**

**Do you agree with this suitability criteria?**

But minor items can be corrected in a reasonable time.

**Officer response – Agree, landlords would be given some time to remedy minor items but these would have to be made clear to the tenant.**

I am assuming that this means that the property will be actively checked over by a qualified professional.

**Officer response – this would normally be in the form of certification from a competent professional. Usually, it will be unfurnished accommodation.**

- Q10. PSO accommodation will be deemed unsuitable where the local housing authority is of the view that the landlord has not taken reasonable fire safety precautions.**

**Do you agree with this suitability criteria?**

But given time to comply.

**Officer response – Agree where minor items. More major hazards might result in the property being deemed unsuitable.**

E.g. Fire Alarms, Carbon Monoxide alarms. Assuming that there are no extenuating circumstances like those mentioned above.

**Q11. PSO accommodation will be deemed unsuitable where the local housing authority is of the view that the landlord has not taken reasonable precautions to prevent carbon monoxide poisoning.**

**Do you agree with this suitability criteria?**

Of course I agree but we mustn't place undue burden on a landlord if it puts the price up. Are the reasonable precautions cheap and simple?

**Officer response – It is proposed that where a carbon monoxide detector is not present (and the property contains a risk of CO) the Council will work with owners to have one installed. This might be by installation through a Council partner.**

**Q12. PSO accommodation will be deemed unsuitable that there is not a current gas safety record for the property.**

**Do you agree with this suitability criteria?**

Is there gas in the property?

**Officer response – this would only apply if gas is supplied to the property.**

**Q13. PSO accommodation will be deemed unsuitable that the accommodation does not have a valid Energy Performance Certificate (EPC).**

**Do you agree with this suitability criteria?**

This can be corrected in days

It has to be better than sleeping on the street so the energy performance is irrelevant.

How energy efficient a house is, is not really essential.

Now this is a load of old tosh. Good insulation brings down running costs and so this must not be overlooked but I am not convinced a paid for EPC is needed. Perhaps last year's running costs could be provided.

**Officer response – The property should have a valid EPC in any event. The policy requirement is not over and above normal requirements. It is intended that the property is not unaffordable to keep warm. This should help the tenancy be sustained.**

**Q14. PSO accommodation will be deemed unsuitable where the local housing authority is of the view that the landlord is not a fit and proper person to be a landlord.**

**Do you agree with this suitability criteria?**

No comments received.

**Q15. PSO accommodation will be deemed unsuitable where the accommodation is a House in Multiple Occupation or HMO (including subject to additional licensing) and is not licensed.**

**Do you agree with this suitability criteria?**

No comment received.

**Q16 PSO accommodation will be deemed unsuitable where the landlord has not provided a written tenancy agreement that the local authority considers to be adequate.**

**Do you agree with this suitability criteria?**

Fine but why not provide one FOC and encourage good landlords to come forward and take on council tenants.

**Officer response – we will work with landlords to improve practice but ultimately it is the landlords' responsibility to have an adequate, written tenancy agreement.**

**Q17. Overall, have we got the proposed suitability criteria right?**

But in many cases, the New Tenant's might be prepared to accept on a temporary basis while its being sorted to comply...[ within a planned period to fix]

**Officer response – Agree in respect of minor items. Each case has to be considered.**

**Appendix 2:**

**Results of Consultation: Demographic Profile of Respondents**

**18. Please tell us which type of respondent you are:**

	No.	Percentage
Homeless or at risk of homelessness	3*	27%
Housing Register applicant	3*	27%
Central Bedfordshire resident	8*	73%
Employee of CBC or partner organisation	0	0%
Other	1	9%
Not recorded	0	0%

*\*Respondents were asked to tick all categories that apply to their situation, 2 (18%) respondents ticked 3 categories*

**19. Please tell us your gender**

Male	5	45%
Female	5	45%
Transgender	0	0%
Prefer not to say	1	9%

**20. Please tell us your age**

18-24 years	1	9%
25-34 years	3	27%
35-44 years	1	9%
45-54 years	2	18%
55-64 years	1	9%
65-74 years	2	18%
Prefer not to say	1	9%

**21. Do you consider yourself to be disabled?**

Under the Equality Act 2010 a person is considered to have a disability if he/she has a physical or mental impairment which has a sustained and long-term adverse effect on his/her ability to carry out normal day to day activities.

Yes	2	18%
No	6	55%
Prefer not to say	2	18%
Not recorded	1	9%

**22. Please tell us your sexual orientation**

Heterosexual	7	64%
Bisexual	0	0%
Gay	1	9%
Lesbian	0	0%

Prefer not to say	3	27%
Not recorded	0	0%

**23. Please tell us your ethnicity**

White: British	8	73%
White: Irish	0	0%
White: Gypsy or traveller	0	0%
White: other	1	9%
Mixed: White and Black Caribbean	0	0%
Mixed: White and Black African	0	0%
Mixed: White and Asian	0	0%
Mixed: other	0	0%
Asian or Asian British: Indian	0	0%
Asian or Asian British: Pakistani	0	0%
Asian or Asian British: Bangladeshi	0	0%
Asian or Asian British: Chinese	0	0%
Asian or Asian British: other	0	0%
Black or Black British: Caribbean	0	0%
Black or Black British: African	0	0%
Black or Black British: other	0	0%
Other	0	0%
Prefer not to say	1	9%
Not recorded	1	9%

**24. Please tell us whether you have a religion or belief**

No religion	3	27%
Christian	6	55%
Buddhist	0	0%
Hindu	0	0%
Jewish	0	0%
Muslim	0	0%
Sikh	0	0%
Other	0	0%
Prefer not to say	1	9%
Not recorded	1	9%

**Appendix 3: Qualitative Feedback from Engagement Events with Stakeholders**

**Questions/Comments - Staff – Social Care, Health and Housing and Registered Social Landlords.**

<b>Question 1:</b>	
<b>What are the advantages / disadvantages of the options to discharge Homeless duty via:</b>	
<ul style="list-style-type: none"> <li>- Social Housing - Direct let</li> <li>- Private Sector Offer (applicants under new policy)</li> </ul>	
<b>Answers:</b>	
<b>Advantages</b>	<b>Disadvantages</b>
Opens up the housing market	Lack of good condition stock <b>Officer response – Agree, this is a risk</b>
More availability/choice of housing – area and variety	How do you know if they are a good tenant? <b>Officer response – This is a risk but tenant background will be explored during homelessness application process.</b>
Reduction in waiting lists	What about tenants that have A.S.B. or Rent Arrears, are they going to be pushed into the private sector <b>Officer response – This is a risk but tenant background will be explored during application process. The policy is not about pushing “poor” tenants into the PRS, this policy applies to social housing stock also.</b>
Guaranteed tenant for at least 12 months, therefore offering some sustainability	If you house them in the private sector what about the costs e.g. deposit as this is normally required by a private sector landlord. <b>Officer response – The Council may have to consider incentives to landlords such as paying the deposit/rent in advance. This could be externally funded and is cost effective</b>
	Rental cost – private a much higher than the local authority <b>Officer response – This is a risk but currently, there are landlords approaching the Council with lower priced accommodation.</b>
	Lack of control over repairs etc <b>Officer response – This is a risk but tenants will know who to raise issues</b>

	<p><b>with and the landlord will know Council expectations, so risk should be lower.</b></p> <p>.</p>
	<p>Prevention work with Private Sector – need assurance/incentives See above</p>
	<p>Need the right sort of properties (2 beds) <b>Agree and this will be part of suitability assessment</b></p>
	<p>Direct Let adhoc at the moment no clear process <b>The policy will provide a clearer process.</b></p>
	<p>Some problems already exist around hard to let properties e.g. reputation of area, boarded up etc. – this will need to be improved if these are to be let in the future. <b>Officer response – To make this policy work, the risk of clients refusing tenancies for these reasons needs to be reduced. It is possible that the lower cost properties will be in less desirable areas but there are not considered to be “no go” areas in Central Bedfordshire. If an area became blighted with high numbers of empty homes, this would be addressed through a focused approach.</b></p>
	<p>End of tenancy – after 12 months if managing tenancy should it be considered to move off list as not sustainable to hold longer term <b>Officer response – the duty stays for 2 years.</b></p>
	<p>Properties – no clear idea of houses available</p> <ul style="list-style-type: none"> <li>• Lacking ready list (central list of people – homeless / type – all round suitability)</li> <li>• If property hard to let then can look at above list. This could include section 106</li> </ul> <p><b>Officer response – Officers are currently establishing working relationships with landlords and letting agents under the Let’s Rent scheme. It is intended to build upon this approach.</b></p>
	<p>Concerns for landlord – 2yrs on register – banding</p> <ul style="list-style-type: none"> <li>• Question –whether policy can ensure equality – put in band 4 for length of</li> </ul>



	<p>tenancy <b>Officer response – This is a risk but will be reviewed as the policy progresses.</b></p> <ul style="list-style-type: none"> <li>• Would individual be disadvantaged for private housing if this was the case</li> </ul> <p><b>Officer response – unsure of the issue here.</b></p>
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**Questions 2.**

**What are the most important issues that the Council has to consider in determining whether a property is suitable for households accepted as homeless?**

**Do you consider the proposed suitability criteria to be fair and reasonable? Please explain your answer**

**Answers:**

There is a difference between the Private Sector and Local Authority in terms of determining what a suitable property is. Generally Private Sector landlords have their own standards and this is dependant on the type of property etc.

**Officer response – The aim of this policy is that PRS properties must be suitable in terms of their condition, safety etc.**

There should be balance between intervention - Private Sector and the Local Authority

**Officer response – This policy will require that the Council works more “in partnership” with PRS.**

Due to the geographical nature of Central Bedfordshire, some tenants may view/accept the offer of Private Sector offers as an viable option as it may offer better accessibility to schools, employment, transport, medical facilities etc. **Officer response – Agree**

Affordability – general the cost of renting privately is dearer

**Officer response – Officers must ensure that accommodation is affordable. It may be more expensive but it must still be affordable.**

It is felt that there should be a basic level of suitability criteria that should take place before each letting – for example:

Check for Category 1 Hazards

Gas Safety Records/Certificate

Energy Performance Certificates

Smoke/Carbon monoxide Testing equipment

**Officer response – agree, this is what is proposed in the policy.**

Are we comparing with the individuals current situation? Would it be unreasonable to consider for them to travel further to work for example? Need good practice guide to include cost / income = affordable action

**Officer response – In the example raised, it may be considered suitable to increase travel distance to work but as long as it is not excessive or unreasonable. Officer’s will have to consider each case on it’s merits.**

School – feeling on table felt it is OK for younger children move school as they can change / adapt. Protection for children at critical time at school

**Officer response – Agree**

Medical Needs – No major hospital within Central Bedfordshire – need to travel. Care packages can be changed. More important should consider if they have caring needs to consider. Try to keep in the area.

**Officer response – Agree**

What about pets – question do we consider this? Need to consider if for medical need. Currently if going into temporary accommodation we can not take animals.

**Officer response – Generally, if someone is facing homelessness, resolving their housing situation should take priority over whether they have pets. It is recognised that people become very attached and Officers would try and match people to homes that allow pets but this might not always be possible whether it is a PRS property of social housing.**

*Condition of housing –*

Need to comply with HRO and legal requirements

CO Detectors – not a requirement by law (could be part of the incentive)

Vulnerable Clients – single person within Social Housing not restricted / Private

Housing restricted if reliant on benefits under 35yrs old they can share

**Officer response – This is recognised as a potential issue. It might not be possible to find a supply of good quality shared accommodation for younger single adults.**

### Question 3

**When should PSO's be considered?**

**Answers:**

It should be considered from the outset/first point of contact

**Officer response - Agree**

Tenants should be given options and should it should be made clear why these option are being made

**Officer response – The Council would rather resolve housing needs before taking a homelessness application and will work with clients to explore options at an early stage. What might be an “option” before an application might also be the home that duty is discharged to.**

It will dependant on how well trained/informed the officer is

**Officer response – Training is important to ensure the policy works.**

It will be dependant on the tenant's circumstances; therefore, it is really important to gain as much information as possible from the outset.

**Officer response - Agree**

PSO – check if 2 tier system

Register housing options – match up / matrix system (simple spread sheet – accessible for everyone)

**Officer response – a Matrix to match accommodation with specific needs might be a good approach. This will be explored.**

### Questions 4

**How do we shape the housing market to support this policy?**

**Answers:**

Clear/concise accessible information for all involved

**Officer response – Agreed, there is a certain need for good information to prospective clients and landlords.**

Good supply of housing  
**Officer response - Agree**  
 Incentives for landlords and do we make it attractive (more detailed discussion needed)  
 Advertisement on Home Connections  
 Tenancy agreements  
 Rent Guarantees  
 Insurance  
 Need more resource within the Council to support

- There is only one Housing Options officer
- Prevention side, Choice, Discharge

**Officer response – The Housing Solutions team will need to focus some resource in this area of work, which in return might help reduce supply.**

- 
- Inspecting the properties need Private Sector support, need specialist (need to consider Private Sector capacity, referrals coming through) Need Stamp of Approval. Should it be an accredited standard? Do we say over a long period of time?

**Officer response – The condition of homes and how they are assessed might be a two tier approach. PSH Officer resource might be called upon if first level view of the property indicates some possible concerns.**

Should have clear timescales  
 Publicity around this that not worse off – sending message out regarding support given.

- With Housing Options a lot of work is done to support tenancy
- Need Support Officer there to support, could be organisations like Bromford Support after the 12 month period

**Officer response – The support to a tenant is recognised as important in some circumstances to sustain a tenancy. There is a resource issue if high level of support is needed, which itself might prevent the use of a PSR property being used.**

<b>Question 5</b>
<b>What do you think should be considered in assessing the priority of allocating suitable accommodation when there is more than one applicant?</b>
<b>Answers:</b>
Affordability Date order Choice Availability Will probably need a mix and match approach depending on the individual circumstances <b>Officer response – The mix and match approach might be the most appropriate in many circumstances but a date order system would be used where all other aspects are equal.</b>
Question regarding Neighbouring authorities – competing against, would need to make more attractive <ul style="list-style-type: none"> <li>• Incentives</li> <li>• Stock of landlords ready to work with</li> <li>• Support – point of contact</li> <li>• Assistance, advice / to bring properties up to standard /more suitable (could</li> </ul>

offer grants to support)

- Housing benefit – having an agreement to fast track (support officer – other authorities support, ability to sustain tenancy, debt advice, benefit advice)

**Officer response – All of these issues will be important to progress whether the property is in Central Bedfordshire or a neighbouring authority. A property in a neighbouring area will mean that there is less direct control/influence with things like fast tracking housing benefit.**

**General comments/observations:**

The need for good, clear and concise information from the outset  
**Officer response – Agreed, information must be clear to advise clients.**

The responsibilities of the tenant/landlord  
**Officer response – Agreed, information must be clear to advise clients.**

Who will supply the information and when – clear protocols  
Good practice guidance  
**Officer response – This will be developed as the policy is approved.**

Education/training for all  
**Officer response – Agreed, Officers will need training following adoption of the policy.**

What will be the L.A. role and the support they will offer  
**Officer response – It is likely that the Council will need to work with partners regarding support provided, such as Bromford Support.**

Clear pathway of options  
**Officer response – The intention is that clients’ options will be made clear before a homeless application is made. In many cases a PRS let will be the most appropriate option, whether before or after a homeless application is made.**

One point of contact  
**Officer response – This is desirable for PRS landlords and letting agents, and will help ensure suitable properties become available.**

Who would give the information and ensure it is kept up-to-date, especially around rights and legislation.  
**Officer response – Information must be clear to advise clients and would be responsibility of the Housing Solutions service.**

**Appendix 4: Qualitative Feedback from Engagement Events with Stakeholders**

**Questions/Comments – Prospective Tenants.**

<b>Question 1.</b>
<b>What conditions do you think the council need to consider in determining whether a property is suitable for households accepted as homeless? Looking at appendix B &amp; C - do you consider the proposed suitability criteria to be fair and reasonable? Please explain your answer</b>
<b>Answer:</b>
<ul style="list-style-type: none"> <li>• On the whole it seems fair - tenants should be made aware of what their expectations of the landlord should be and what the landlord's commitment for the tenant will be.</li> <li>• The need for annual checks on the items listed in appendix B &amp; C and the landlord themselves.</li> <li>• Inspections at the beginning of the tenancy</li> <li>• Who is going to make sure they actually do what they say they are going to do and monitor that their certificates etc. are in date for the duration of tenure and that they are conducted annually.</li> </ul> <p><b>Officer response – the checks made at the beginning will illustrate the Council's expectations to the landlord. After the first 12 months tenancy, there may be further checks by the Council to ensure that any annual requirements are met. This will depend upon the partnership and understanding between the Council and landlord. In addition the tenant will be aware of what the landlord's obligations are and will know who to contact within the Council if requirements are not met.</b></p> <ul style="list-style-type: none"> <li>• An information pack outlining what the expectation are from both sides would be a good move forward along with copies of certificates, contact details etc.</li> </ul> <p><b>Officer response – this is considered to be a good idea and will be developed in conjunction with progressing the Policy approval.</b></p>

<b>Question 2</b>
<b>If you are homeless you may not have a choice in the type of housing that is offered, although deemed suitable based on need. Do you think is fair? If not, what would make it fair? Please explain your answer.</b>
<b>Answer:</b>
<ul style="list-style-type: none"> <li>• It is important that the Council vets the tenancy agreement to ensure that the landlord is appropriate and meets its responsibilities. Landlords should be vetted on an annual basis and have an inspection, or the landlord could complete a checklist to show that the property is still suitable annually. If the property no longer meets the suitability criteria then the Council should take action. It should be clear how complaints about the landlord can be made. The tenancy agreement should clearly state what costs the tenant is responsible for and what facilities are available to them especially in HMOs. Landlord checks should include whether they are VAT registered and have liability insurance.</li> </ul> <p><b>Officer response – the checks made at the beginning will illustrate the Council's expectations to the landlord. After the first 12 months tenancy, there may be further checks by the Council to ensure that any annual requirements are met. In addition the tenant will be aware of what the landlord's obligations are and will know who to contact within the Council if</b></p>

requirements are not met. Officers will explore the offer of template, good practice tenancy agreements. The policy does, however, include requirements for appropriate tenancy agreements.

The issue around liability assurance will be explored by Officers. It may, however, be too onerous on landlords to require such insurance.

- Pets should be in the criteria as they are a coping mechanism for some people.  
**Officer response – This is recognised as a potentially difficult issue. The first priority for households accepted as priority homeless will be to find a roof over their heads. This may mean that accommodation where pets are allowed will be a secondary matter. Council Officers will try and match a household with a pet to a house where the owner allows pets but this might not be possible each time. There are restrictions in Council property on pets, not just the PRS. In summary, a property will not be rejected as unsuitable if the landlord does not allow pets, although Officers will try and match where possible.**

- The criteria should consider 'no go areas', i.e. areas where the applicant could be at more risk of relapsing because they may be moved in to an area where drug pushers are known to operate or where old social networks that had a negative impact on their health and well being could be based. This is applicable to offending behaviour and also drug and alcohol abuse.

**Officer response – these issues would need to be considered as part of suitable location. It is likely that external agency advice would be needed for some issues. There is a risk however, that households may be too restrictive on areas than is reasonable.**

- Access to private outside space and light has health and wellbeing implications.  
**Officer response – these facilities are beneficial but are not always available and would not make a property unsuitable if they were missing.**

- The property needs to be suitable for the person's accessibility needs e.g. a top floor flat with no lift is not suitability for people with mobility problems.

**Officer response – agreed. In most cases, households containing someone with a significant disability would need an adapted or adaptable property.**

- Lorraine did not have a preference for social or private sector housing. The important element was assurances about the quality of property and that there was someone available to contact if there were problems with the landlord

**Officer response – agreed regarding quality of property. The provision of an information pack will be explored before the policy is fully implemented.**

- The local authority's role should continue throughout the 2 years to deal with problems raised by the applicant around whether the property was still suitable. Normally relationship ends with the L.A. once the tenant is in situ. I feel there still needs to be a relationship with the LA. For the following reasons:

- Landlords need to submit a fit for purpose service and that this should be monitored independently

- Internal systems need to be in place to ensure that it remains a suitable property. L.A. should not wash their hands of the tenant.

**Officer response – The Housing Solutions team contain officers who can check property condition and will respond to tenant's concerns.**

<b>Questions 3</b>
<b>As a prospective tenant – What do you think we need to do to increase the number of available homes to meet homelessness demand (any tenure)?</b>
<b>Answer:</b>
<ul style="list-style-type: none"> <li>• Clearer pathways what is “affordable”</li> <li>• Definitions of tenure e.g. sub-lets, shared etc.</li> <li>• Where there is shared tenancy there should be a clear agreement on who pays for what based on rooms size and amenities.</li> <li>• Good balance of properties</li> </ul> <p><b>Officer response – These views are noted and will be considered within the Good Practice guidance notes as finer detail considerations. Whilst they may be desirable, they may not be a strict requirement.</b></p>

<b>Questions 4</b>
<p><b>Currently prospective tenants are considered based on their housing need and date of application.</b></p> <p><b>From the following 8 listed factors please rank in order of priority/importance you would consider when assessing the priority of allocating suitable accommodation? (1 being the highest priority/importance – 8 being low priority/importance)</b></p> <ul style="list-style-type: none"> <li>• <b>Affordability/cost of renting</b></li> <li>• <b>Location of property</b></li> <li>• <b>Location from employment</b></li> <li>• <b>Caring responsibilities</b></li> <li>• <b>Accessibility to schools and education</b></li> <li>• <b>Access to Medical Facilities</b></li> <li>• <b>Accessibility to local services and amenities</b></li> <li>• <b>Access to transport</b></li> </ul>
<b>Answer:</b>
<p>Affordability/cost of renting</p> <p>1 - Location of property</p> <p>2 - Access to transport.</p> <p>3 - Access to Medical Facilities</p> <p>4 - Accessibility to local services and amenities</p> <p>5 - Accessibility to schools and education</p> <p>6 - Location from employment</p> <p>7 - Caring responsibilities</p> <ul style="list-style-type: none"> <li>• If there are no good/regular transport links in place, then it makes having access to the other services out of reach.</li> <li>• Depending on who you talk/engage with the above will change due to their personal circumstances.</li> <li>• I would like added to the above list pets being allowed into RSL properties” as Pets are really important and may be seen as family and may be their only coping mechanism.</li> </ul>

<b>Question 5</b>
<b>Where all other suitability conditions are met, what are your views on being allocated a property in a neighbouring authority</b>
<b>Answer:</b>
Discharging the duty outside the local authority area will compromise the applicants’



ability to get on to the social housing register due to the residency criteria. 2 years is not enough for a number of local authorities' allocations policies and moving the person out of the area will put them in to 'no man's land'.

**Officer response – this is recognised but the aim of this policy is to remedy homelessness in the first instance. A secondary aim is for a sustainable tenancy in the PRS, not for an eventual move into social housing.**

***Further Comments***

- If you are with the L.A. you get tenancy support – RSL don't provide this. The process is very complicated and not easy to understand.
- You also have better rights with a L.A. than a RSL
- It's about trust and honesty





# **Social Care Health and Housing Overview and Scrutiny Committee 28<sup>th</sup> July 2014**

## **Budget Monitoring 2013/14 Outturn**

# General Fund Revenue SCHH

The 2013/14 outturn is £63.8m after use of reserves – an underspend of £2.1m before transfers to reserves of £2.2m.

## Key Variances and Indicators

Over spend on:

- 65+ placements and packages - £1.5m (efficiency shortfall on residential care)

Offset by underspends on:

- Under 65 physical disability packages - £0.134m
- Reablement staffing - £0.588m (vacancies)
- Customer Income from charges - £0.792m
- Learning Disabilities direct services staffing - £0.157m (restructure)
- Housing Solutions – establishment savings and additional fee income - £0.129m
- Local Welfare Reform and Homelessness Grant underspend- £0.340m
- NHS Grant under spend - £0.280m
- Dementia premium - £0.200m
- Learning Disabilities Health Transfer contract underspend – £0.264m
  
- Efficiencies – overall surplus of £0.28m (target of £4.7m)
- Debt - £6.3m (£9.6m Qtr 3) - £2.0m charges on property (legacy and CBC), £2.9m

Health

# SCHH Net Revenue Outturn 2013/14

Service Area	Full Year 2013/14					
	Approved Budget	2013/14 Outturn	Outturn Variance	Use of Earmarked reserves	Outturn Variance after use of earmarked reserves.	Outturn as % of Budget
<b>Director</b>	190	230	40	0	40	21%
<b>Housing Solutions</b>	1,516	1,047	(469)	0	(469)	-31%
<b>Older People and Physical Disabilities</b>	37,794	37,979	185	(202)	(17)	0%
<b>Learning Disabilities and Mental Health</b>	21,562	21,459	(103)	(214)	(317)	-1%
<b>Commissioning</b>	12,424	11,766	(658)	(76)	(734)	-6%
<b>Business and Performance</b>	(7,584)	(8,137)	(553)	(92)	(645)	9%
<b>TOTAL</b>	65,902	64,344	(1,558)	(584)	(2,142)	-3%

## **Analysis of SCHH Reserves 2013/14**

The majority of the underspend was earmarked to new or existing reserves as follows:

- £0.280m of NHS grant funding agreed to support the implementation of the Better Care Fund;
- £0.340m of Housing General Fund under spend which will be used to create a Welfare Reform reserve
- £0.500m to support the Older People Homes transfer in 2014/15
- £0.059m Zero Based Review grant under spend
- £0.103m Winter Pressures grant under spend
- £0.086m for the Strategic Transitions project which will complete in 2014/15
- £0.800m for the Supreme Court judgement on Deprivation of Liberty Safeguards (DoLS).

The closing position on reserves was £6.7m (£5.1m at 1<sup>st</sup> April 2013)

# General Fund Revenue SCHH

Residential and nursing placement approvals to Quarter 4 for Older People

Admitted From	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Hospital	34	22	35	31	122
Own Home	21	9	14	18	62
Rehabilitation	8	2	3	5	18
Respite	28	17	16	19	80
Other	9	6	2	6	23
<b>TOTAL</b>	<b>100</b>	<b>56</b>	<b>70</b>	<b>79</b>	<b>305</b>

- There were 245 deaths during the financial year
- The residential placement efficiency was particularly challenging. The net movement in residential placements was an increase of 33 placements (7%) across block and spot contracts, with the latter increased by 52 (10%)

# SCHH Capital Position

Key points to note:

Forecast gross spend = £5.2m versus budget of £10.3m

## Housing General Fund

- Disabled Facility grants - under spend of £0.931m due to reduced referrals (£0.5m permanent under spend)
- Empty Homes – under spend of £0.205m – savings achieved where owner has undertaken work / deferred costs to 2014/15
- Timberlands – net under spend of £0.079m – deferred spend due to contractual issues

## Adult Social Care

- Campus Closure – deferred spend of £3.1m. Two schemes opened in October (Silsoe and Lancot Drive, Dunstable) third CBC scheme at Lancot Drive being built due to open Sept 2014
- ICT projects – transferred to Customer First, and subject to review of software providers' functionality – deferred spend of £0.3m

# Provisional Outturn HRA Capital

- Capital outturn - £7.597m (Revised Budget £7.7m)
- £1.622m spent at Priory View (Revised Budget £1.8m) - funded by Extra Care Development Reserve
- Rest of programme funded by revenue (£5.775m) and capital receipts (£0.2m)
- 30 RTB sales (19 in 2012/13) have yielded a total of £1.889m (Revised Budget £1.5m) of retained capital receipts
- Y/end balance of unapplied capital receipts £2.346m

## • Landlord Services Business Plan/HRA Revenue

- Provisional revenue surplus of £6.958m (Revised Budget £7.112m)
- Year end reserves of £20.710m (Revised Budget £20.686m) excluding unapplied capital receipts



# Public Health Highlights

## Overall

- The full year outturn position for 2013/14 as at the end of the financial year is a balanced budget, following a transfer to earmarked reserves of £927k (ringfenced).

## Service financials

- **Substance Misuse** – underspend of £108k mainly as a result of lower redundancy costs than expected, savings on the Drug Intervention Programme was an additional £73k.
- **5 – 19 Healthy Child Programme** – total underspend of £186k in respect of contract variation. CBC share totalled £111k.
- **Sexual Health** – overspend of £261k due to retendering of CASH, and GUM/ Primary Care activity relating to CBC share.
- **Payroll** – the saving on vacant posts/maternity leave was £204k.
- **SLA Expenditure** – savings across services led by Bedford Borough totalled £183k.



# Public Health Highlights

## Strategic Reserve

- Reserve of £523k established during budget setting to be used at the discretion of CBC alone.
- Prescribing costs of £347k were accrued at the end of the year, resulting in an underspend on the strategic reserve of £176k.

## Overheads

- CBC corporate budget includes £631k contribution to overheads from Public Health

# Public Health Financials

Month: March 2014	Year				Variance	Transfer to reserves	Variance after use/transfer to earmarked reserves
	Budget	Actual	Use of Reserves	£000			
	£000	£000	£000	£000	£000	£000	£000
Director of Public Health	1,230	967	0	-263	263	0	0
Assistant Director Public Health	1,215	1,103	-65	-177	177	0	0
Head of Service Children, Young People and Health Inequalities	3,058	3,058	0	0	0	0	0
Head of Service Older People and Adults	1,120	814	0	-306	306	0	0
Drugs & Alcohol	3,250	3,069	0	-181	181	-0	-0
Less Government Grant	-9,873	-9,873	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>-862</b>	<b>-65</b>	<b>-927</b>	<b>927</b>	<b>0</b>	<b>0</b>

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**Meeting:** Social Care, Health and Housing Overview and Scrutiny Committee  
**Date:** 28 July 2014  
**Subject:** Quarter Four Performance Monitoring Report  
**Report of:** Cllr Mrs Carole Hegley, Executive Member for Social Care, Health and Housing  
**Summary:** The report highlights the performance for the Social Care, Health and Housing Directorate for Quarter 4 of 2013/14

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**Advising Officer:** Julie Ogley, Director of Social Care, Health and Housing  
Muriel Scott, Director of Public Health

**Contact Officer:** Nick Murley, Assistant Director, Business and Performance  
Celia Shohet, AD, Public Health

**Public/Exempt:** Public

**Wards Affected:** All

**Function of:** Council

<b>CORPORATE IMPLICATIONS</b>
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<b>Council Priorities:</b>
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- |  |
|--|
| <p>1. The quarterly performance report underpins the delivery of the Council's priorities, more specifically in the area of promoting health and well being and protecting the vulnerable.</p> |
|--|

<b>Financial:</b>
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- |   |
|---|
| <p>2. There are no direct financial implications.</p> |
|---|

<b>Legal:</b>
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- |   |
|---|
| <p>3. There are no direct legal implications.</p> |
|---|

<b>Risk Management:</b>
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- |  |
|--|
| <p>4. Areas of ongoing underperformance are a risk to both service delivery and the reputation of the Council.</p> |
|--|

<b>Staffing (including Trades Unions):</b>
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- |                           |
|---------------------------|
| <p>5. Not Applicable.</p> |
|---------------------------|

<b>Equalities/Human Rights:</b>
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6. This report highlights performance against performance indicators which seek to measure how the Council and its services impact across all communities within Central Bedfordshire, so that specific areas of underperformance can be highlighted for further analysis/drilling down as necessary.
7. As such, it does not include detailed performance information relating to the Council's stated intention to tackle inequalities and deliver services so that people whose circumstances make them vulnerable are not disadvantaged. The interrogation of performance data across vulnerable groups is a legal requirement and is an integral part of the Council's equalities and performance culture, which seeks to ensure that, through a programme of ongoing impact assessments, underlying patterns and trends for different sections of the community identify areas whether further action is required to improve outcomes for vulnerable groups.

**Public Health**

8. The report highlights performance against a range of Adult Social Care, Housing and Public Health indicators that are currently in the corporate indicator set.

**Community Safety:**

9. Not Applicable.

**Sustainability:**

10. Not Applicable.

**Procurement:**

11. Not applicable.

**RECOMMENDATION:**

The Committee is asked to consider and note the report

**Introduction**

12. This report provides information on how the Social Care, Health and Housing Directorate's contribution to the Medium Term Plan is being met.

**Overview**

13. The Directorate continues to perform well against the Medium Term Plan priority of "Promote health and wellbeing and protecting the vulnerable".
14. There has been some improvement since Quarter 3 with only three of the measures are under performing. Two are Red: Number of Additional "Extra Care" flats provided (C2 MTP) and Clients receiving self directed support (C6 MTP) and one is Amber, Percentage of decent homes (Council stock) (C3 MTP).

15. C2 MTP, Number of additional "Extra Care" flats is Red as the new likely delivery date of Summer 2015 for Priory View exceeds the MTP target of 2014. A Ground breaking event to mark start on site took place in April 2014.
16. The performance of C6 MTP, the number of social care clients receiving self directed support remains red against the local stretch target of 100%. This indicator however continues to perform well against the national target of 70%.
17. The Percentage of decent homes (Council stock) is Amber. As previously reported, the MTP target of 100% decent homes may not be achieved because replacement of elements within Council properties (e.g. kitchens, bathrooms, etc) are no longer be based on failure of the Decent Homes Standard, but on the life expectancy of the element.
18. The remaining indicators are performing in line with the milestones set.
19. Performance against C1 MTP, Protecting vulnerable adults, continues to progress. The audit of Safeguarding cases is continuing on a rolling monthly basis, using a combination of "peer audit" and safeguarding team case file audit. The external audit of safeguarding files took place in April and the initial feedback is positive.
20. The MTP target of 100% of Central Bedfordshire covered by a Village Care Scheme was achieved in Quarter 4, with two schemes covering Sandy and Leighton/Linslade becoming operational.
21. Good progress is being made on Council commissioned dementia care rated as good or excellent (C 5a MTP). Using the ADASS quality workbook, 61% of dementia care providers are rated as Good or Excellent.
22. Good progress continues to be made on the number of Health Checks offered (C 7 MTP) with the target being exceeded and in line to deliver the Medium Term Plan target. The proportion of health checks completed during the year, is at a similar level to 2012-13.

### **Director's Summary – Social Care, Health and Housing**

23. The Directorate has performed well during 2013-14 against the Medium Term Plan priority "Promote health and wellbeing and protecting the vulnerable".
24. Performance remained consistently strong for the proportion of customers receiving self-directed support (C1 MTP). There was a slight drop in the proportion of customers receiving self-directed support, compared to the previous year, however overall performance still exceeded the national target and remains strong in comparison to neighbouring authorities and the Eastern region. The local aspiration to achieve 100% remains.
25. A Ground Breaking event marking the start of the construction work at the Priory View Extra Care development site took place on the 11th April 2014. The anticipated completion date for Priory View is August 2015.

26. The Village Care Schemes for Sandy and Leighton/Linslade came into being in February and March 2014, with the Leighton/Linslade scheme covering the three wards in Leighton Buzzard and Linslade. All Wards in Central Bedfordshire are now covered by a Village Care scheme, achieving the target of 100% coverage.
27. Progress has been maintained in the other targets.

### **Director's Summary – Public Health**

28. The number of Health Check invitations offered exceeded the revised target set as stated in the Medium Term Plan reaching 132% by the end of the full period.
29. In addition to the figures relating to those having been offered Health Checks, the cumulative percentage of Health Checks delivered was 87% for the period, a similar level of performance from 2012/13.
30. The reasons for not achieving the annual target for Health Checks delivered included some significant underperformance by some providers. This under-activity could not be fully supplemented by either alternative GP providers or alternative commissioned services. Work will continue to support the underperforming Primary Care providers with as well as exploring alternative methods of delivery, including clustering delivery around high-performing providers within GP localities. Horizon Health Choices will also be contracted to increase delivery options, both in supporting under-performing providers and ensuring supplementary delivery of the NHS Health Check service in a range of community settings.

### **Appendices:**

Appendix A – Quarter Performance Report Q4 2013/14

### **Background papers and their location: (open to public inspection)**

None

## Appendix A - Quarterly Performance Report

### Medium Term Plan Indicators Appendix A indicators

#### Quarter 4 2013/14

Report comparison - Depends on the nature of the indicator		Performance Judgement			
		Direction of travel (DoT)		RAG score (Standard scoring rules unless the indicator specifies alternative scoring arrangements)	
<b>Seasonal</b>	Compared to the same time period in the previous year		Performance is reducing	<b>R</b>	RED - target missed / off target - Performance at least 10% below the required level of improvement
<b>Quarter on quarter</b>	Compared to the previous quarter		Performance remains unchanged	<b>A</b>	AMBER - target missed / off target - Performance less than 10% below the required level of improvement
<b>Annual</b>	Compared to one fixed point in the previous year	æ	Performance is improving	<b>G</b>	GREEN - Target achieved or performance on track to achieve target

## Overview of performance

Ref	Indicator	Performance will be reported:	Performance information being reported this quarter		
			Time period		Performance
<b>Promote health and wellbeing and protect the vulnerable</b>					
<b>C 1 MTP</b>	Protecting Vulnerable Adults	Quarterly	Quarter 4 2013/14		<b>G</b>
<b>C 2 MTP</b>	Number of additional 'Extra Care' flats provided	Quarterly	Quarter 4 2013/14		<b>R</b>
<b>C 3 MTP</b>	Percentage of decent homes (Council stock)	Quarterly	Quarter 4 2013/14		<b>A</b>
<b>C 4a MTP</b>	Number of Village Care schemes in operation	Quarterly	Quarter 4 2013/14	æ	<b>G</b>
<b>C 5a MTP</b>	Percentage of council commissioned dementia care classed as 'good' or 'excellent'.	Quarterly	Quarter 4 2013/14		<b>G</b>
<b>C 6 MTP</b>	Clients receiving self directed support	Quarterly	Quarter 4 2013/14		<b>R</b>
<b>C7 MTP</b>	Percentage of 40 to 74 year olds offered a health check	Quarterly	Quarter 4 2013/14	æ	<b>G</b>



**Promote health and wellbeing and protect the vulnerable**

<b>C 1 MTP</b>		<b>Protecting Vulnerable Adults</b>						
<b>Milestones:</b> 1. Independent audits of safeguarding case files - Annual 2. Annual Safeguarding Report - Annual 3. Develop & implement new safeguarding performance framework – September 2013	Latest comparator group average	-	Report comparison	-	Performance Judgement		<b>G</b>	
<b>Comment:</b> Current Performance: A monthly audit of Safeguarding cases is continuing, with action taking place where required. Good practice examples are shared with Adult Social Care staff through the Practice Workshops run by the Safeguarding Team. The necessary changes to the Adult Social Care database (Swift) for the new reporting framework have been implemented and a data quality framework has been developed. Monthly performance reports are presented to the Executive and Deputy Executive members for SCHH. The external audit of case file took place at the end of April and the initial feedback is positive.  Planned Actions: The monthly audit by the safeguarding team will continue into 2014-15 and the external audit of files will be produced.								

<b>C 2 MTP</b>		<b>Number of additional 'Extra Care' flats provided</b>						
<b>Milestones:</b> 1. Secure Planning Permission; agree s106 – July 2013 2. Procure contractor - tbc 3. Commence Construction – January 2014 4. Open New Provision – by December 2014	Latest comparator group average		Report comparison		Performance Judgement		<b>R</b>	
<b>Comment:</b> Current Performance: A Ground breaking event marking the start of work on Priory View site took place on the 11th April.  Planned Actions: The anticipated completion date for Priory View is August 2015.								

C 3 MTP		Percentage of decent homes (Council stock)														
Unit	Good is	2012/13				2012/13				Latest comparator group average	-	Report comparison	Seasonal	Performance Judgement	æ	A
%	Low	Qu 1	Qu 2	Qu 3	Qu 4	Qu 1	Qu 2	Qu 3	Qu 4 / Outturn							
<b>Target</b>		98.20	98.20	99.00	100	100	100	100	100							
<b>Actual</b>		99.3	99.4	99.35	99.35	99.6	99.7	99.7	99.6							

**Comment:**

Current Performance:

The MTP target for 2013-14 has not been achieved, as a result of the change of approach outlined in the Housing Asset Management Strategy.

Planned Actions:

As previously reported, following the adoption of the Housing Asset Management Strategy, replacement of elements within Council properties (e.g. kitchens, bathrooms, etc) will not be based on failure of the Decent Homes Standard, but on the life expectancy of the element.

C 4a MTP		Number of Village Care schemes in operation											
Unit	Good is	2013/14					Latest comparator group average	-	Report comparison	-	Performance Judgement		A
%	High	Qu 1	Qu 2	Qu 3	Qu 4	Outturn							
<b>Target</b>		NA	87.1	90.3	100	100							
<b>Actual</b>		NA	87.1	87.1	100	100							

**Comment:**

Current Performance:

The Leighton/Linslade scheme came into being in March 2013, covering the three wards in Leighton Buzzard and Linslade, resulting in all wards in Central Bedfordshire being covered by a Village Care scheme.

Planned Actions:

During 2014-15, consideration is being given to increasing the number schemes available in each area.

C 5a MTP		Percentage of Council commissioned dementia care classed as 'good' or 'excellent'										
Unit	Good is	2013/14					Latest comparator group average	-	Report comparison	-	Performance Judgement	G
%	High	Qu 1	Qu 2	Qu 3	Qu 4	Outturn						
<b>Target</b>		<b>60</b>	<b>60</b>	<b>60</b>	<b>60</b>	<b>60</b>						
<b>Actual</b>		<b>NA</b>	<b>61.2</b>	<b>61.2</b>	<b>61.2</b>	<b>61.2</b>						
<p><b>Comment:</b>            Current Performance:            Using the Association of Directors of Adult social Care (ADASS) quality workbook, 61% of dementia care providers are rated as Good or Excellent.</p> <p>Planned Actions:            Work will continue with providers to increase the proportion of council commissioned dementia care rated as 'good' or 'excellent'.</p>												

C 6 MTP		Clients receiving self directed support (ASCOF1c)																
Unit	Good is	2011/12	2012/13					2013/14					Latest comparator group average	44.1 CIPFA 2011/12	Report comparison	Quarter on Quarter	Performance Judgement	R
		Outturn	Target (Outturn)	Qu 1	Qu 2	Qu 3	Qu 4	Outturn	Target (Outturn)	Qu 1	Qu 2	Qu 3						
%	High	52.9	100	54.7	66.2	71.7	75.9	75.9	100	77.1	77.5	75.3	74.6	74.6				
<p><b>Comment:</b>            Current Performance:            Provisional Outturn - Whilst performance has dipped at the end of the year, the Council's performance remains strong and is likely to perform well against the Council's statistical neighbours and within the Eastern region. Between April 2013 and March 2014, 3,236 people received self-directed support, The final outturn for this measure will be available from the end of May and it is considered likely that the outturn will increase following a period of data cleansing.</p> <p>Planned Actions:            Work will continue to strive towards the ambitious MTP target of 100%.</p>																		

C 7 MTP		NHS Health checks (percentage of people aged 40 to 74 years of age offered a health check).														
Unit	Good is									Latest comparator group average		Report comparison	Quarter on Quarter	Performance Judgement	æ	G
%	High		2010/11	2011/12	2012/13				2013/14							
		Outturn	Outturn	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Outturn	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Outturn			
Percentage offered a health check	Target	Number	12,999	20,822	6,014	6,014	6,014	6,016	24,058	3,979	3,979	3,997	3,997	15,952		
	Actual	Number	14,923	21,466	5,057	4,978	9,083	6,651	25,769	6,091	4,312	5,129	5,526	21,058		
		%		115	103	84	83	151	111	107	153	108	128	138	132	
Number of Health checks delivered	Target	Number	6,500	10,411	3,007	3,007	3,007	3,008	12,029	2,767	2,767	2,767	2,767	11,068		
	Actual	Number	7,547	10,499	1,992	2,398	2,949	3,148	10,487	2,714	2,328	2,267	2,290	9,599		
		%		116	101	66	80	98	105	87	98	84	82	83	87	

**Comment:**  
Current Performance:  
The number of Health Check invitations offered exceeded the revised target set as stated in the Medium Term Plan reaching 132% by the end of 2013/14.  
In addition to the figures relating to those having been offered Health Checks, the cumulative percentage of Health Checks delivered was 87% for the 2013/14, a similar level of performance from 2012/13.  
The reasons for not achieving the annual target for Health Checks delivered included some significant underperformance by some providers. This under-activity could not be fully supplemented by either alternative GP providers or alternative commissioned services.

Planned Actions:  
Work will continue to support the underperforming Primary Care providers with as well as exploring alternative methods of delivery, including clustering delivery around high-performing providers within GP localities. Horizon Health Choices will also be contracted to increase delivery options, both in supporting under-performing providers and ensuring supplementary delivery of the NHS Health Check service in a range of community settings.

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**Meeting:** Social Care Health and Housing Overview & Scrutiny Committee  
**Date:** 28 July 2014  
**Subject:** Work Programme 2014 – 2015 & Executive Forward Plan  
**Report of:** Chief Executive  
**Summary:** The report provides Members with details of the currently drafted Committee work programme and the latest Executive Forward Plan.

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**Contact Officer:** Paula Everitt, Scrutiny Policy Adviser  
**Public/Exempt:** Public  
**Wards Affected:** All  
**Function of:** Council

#### **CORPORATE IMPLICATIONS**

##### **Council Priorities:**

The work programme of the Social Care Health and Housing Overview & Scrutiny Committee will contribute indirectly to all 5 Council priorities. Whilst there are no direct implications arising from this report the implications of proposals will be details in full in each report submitted to the Committee

#### **RECOMMENDATION(S):**

1. that the Social Care Health and Housing Overview & Scrutiny Committee
  - (a) considers and approves the work programme attached, subject to any further amendments it may wish to make;
  - (b) considers the Executive Forward Plan; and
  - (c) considers whether it wishes to add any further items to the work programme and/or establish any Task Forces to assist it in reviewing specific items.

#### **Overview and Scrutiny Work Programme**

1. Attached is the currently drafted work programme for the Committee.
2. The Committee is now requested to consider the work programme attached and amend or add to it as necessary.

### Overview and Scrutiny Task Forces

3. In addition to consideration of the work programme, Members may also wish to consider how each item will be reviewed i.e. by the Committee itself (over one or a number of Committee meetings) or by establishing a Member Task Force to review an item in greater depth and report back its findings.

### Executive Forward Plan

4. Listed below are those items relating specifically to this Committee's terms of reference contained in the latest version of the Executive's Forward Plan to ensure Members are fully aware of the key issues Executive Members will be taking decisions upon in the coming months. The full Executive Forward Plan can be viewed on the Council's website at the link at the end of this report.

Issue	Indicative Exec Meeting date
Central Bedfordshire Council's Homelessness Duty	19 August 2014
Non Key Decisions	Indicative Exec Meeting date
Quarter 1 Budget Monitoring	19 August 2014
Quarter 1 Performance Report -	14 October 2014
Quarter 2 Budget Monitoring	9 December 2014
Quarter 2 Performance Report	13 January 2015
Quarter 3 Budget Monitoring	10 February 2015

### Conclusion

5. Members are requested to consider and agree the attached work programme, subject to any further amendment/additions they may wish to make and highlight those items within it where they may wish to establish a Task Force to assist the Committee in its work. This will allow officers to plan accordingly but will not preclude further items being added during the course of the year if Members so wish and capacity exists.

### Appendix A – Social Care Health and Housing Overview and Scrutiny Work Programme.

#### Background reports

Executive Forward Plan (can be viewed at any time on the Council's website) at the following link:-

<http://www.centralbedfordshire.gov.uk/modgov/mgListPlans.aspx?RPId=577&RD=0>

**Appendix A: Social Care, Health and Housing OSC Work Programme (2014/15)**

OSC date	Report Title	Description
22 September 2014	Mental Health Procurement	To receive a joint update on the Procurement of Mental Health Services.
22 September 2014	Progress report on Delivery of Winterbourne View Joint Action Plan	To consider and comment on the progress report and Joint Action Plan
22 September 2014	Strokes Services	To consider a report on the services available to stroke sufferers in Central Bedfordshire
22 September 2014	Park Homes Strategy	The strategy is an overarching document that sets out the approach for all Park Home issues in Central Bedfordshire including standards, fees, advice, assistance and licensing
22 September 2014	Homelessness Review	To consider and comment on the Homelessness Review
22 September 2014	Children and families act-SEND reforms	To consider a report on the implications of the reforms. <b>Members of Children's Services OSC to be invited for this item.</b>
22 September 2014	Quarter 1 Performance Report	To consider the quarter 1 performance report
22 September 2014	Quarter 1 Budget Monitoring	To receive the quarter 1 budget monitoring reports for the Revenue, Capital and Housing Revenue Account
17 November 2014	Tenant Scrutiny Panel	The Tenant Scrutiny Panel to report on the implementation of the Anti Social Behaviour recommendations and the next area of investigation.
26 January 2015	Quarter 2 Budget Monitoring	To receive the quarter 2 budget monitoring reports for the Revenue, Capital and Housing Revenue Account
26 January 2015	Quarter 2 Performance Report	To consider the quarter 2 performance report
26 January 2015	Draft Budget 2015/16	To consider the draft budget for 2015/16
16 March 2015	Homelessness Strategy	To consider and comment on the Homelessness Strategy
15 June 2015	Quarter 3 Budget Monitoring	To receive the quarter 3 budget monitoring reports for the Revenue, Capital and Housing Revenue Account
15 June 2015	Quarter 3 Performance Report	To consider the quarter 2 performance report

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