



# **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.

Question 1:	
What are the advantages / disadvantages of the options to discharge Homeless duty via:	
<ul style="list-style-type: none"> <li>- Social Housing - Direct let</li> <li>- Private Sector Offer (applicants under new policy)</li> </ul>	
Answers:	
Advantages	Disadvantages
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  <b>Officer response – unsure of the issue here.</b></li> </ul>
--	---

## 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.**

**Question 5**

**What do you think should be considered in assessing the priority of allocating suitable accommodation when there is more than one applicant?**

**Answers:**

Affordability

Date order

Choice

Availability

Will probably need a mix and match approach depending on the individual circumstances

**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.**

Question regarding Neighbouring authorities – competing against, would need to make more attractive

- Incentives
- Stock of landlords ready to work with
- Support – point of contact
- Assistance, advice / to bring properties up to standard /more suitable (could

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>Currently prospective tenants are considered based on their housing need and date of application.</p> <p>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)</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