

Cabinet

Tuesday 9 March 2021

11.00 am

Online/Virtual: This meeting will be livestreamed on Southwark Council's YouTube channel here: <https://www.youtube.com/user/southwarkcouncil>

Appendices

List of Contents

Item No.	Title	Page No.
8.	Temporary Accommodation Policy and Action Plan Appendices 1 – 6.	1 - 57
9.	Discretionary Service Charge Loan Policy Review Appendices 1 – 3.	58 - 72

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APPENDIX 1

Accommodation Procurement Policy for Homeless Households

Section 1: Introduction and Scope

1. This policy sets out:
 - Challenges facing the council in procuring accommodation for homeless households, both for temporary accommodation and for private rented sector offers (“PRSOs”) to discharge the council’s homelessness duties (see below for a detailed explanation of the differences between them).
 - The general principles that will be followed when procuring private accommodation for homeless households.
 - An estimate of the number of properties that are needed for these purposes and an action plan for meeting these needs.
 - An action plan for procuring properties for homeless households.
2. This policy will be monitored and formally reviewed after it has been in operation for 12 months and annually thereafter.
3. **Temporary Accommodation** comprises two forms of accommodation. First, emergency accommodation (called stage 1), for use during the relief stage of homelessness and whilst a household’s homeless application is being assessed. Secondly, there is longer-term, (stage 2) accommodation. This accommodation is for households where the council has accepted a housing duty to them and is provided until suitable longer term accommodation is available.
4. Stage 1 accommodation is generally ‘nightly-booked’ as it is only intended to be for short periods of time and is more expensive than longer term Stage 2 accommodation. In addition to this, the council has 350 hostel spaces for general needs homeless households, which is cost neutral to the council.
5. The council has arrangements with local landlords and also a small number of registered providers (housing associations) to provide Stage 2 accommodation. In addition to these leased forms of accommodation, the council uses its own vacant stock which is decanted and planned for regeneration.
6. **Private rented sector offers (“PRSOs”)**
 These are offers made by the council to homeless households where it has accepted a housing duty to them of private rented accommodation on the basis of a fixed term Assured Shorthold Tenancy. The council has decided to make these offers to provide people with sustainable, affordable and more settled accommodation as an alternative to a long wait in temporary accommodation for social housing.

Section 2: Procurement challenges

7. There are severe constraints on the amount of temporary accommodation that can be procured from registered providers or by direct purchase. While the council will continue to pursue such opportunities where they are available, a key component in the council’s procurement strategy is accommodation sourced from the private sector.

8. The council aims to procure as much private accommodation for homeless households in Southwark - or as close to it as practicable – as it can. This is the best way of helping households to remain in their communities and to enable the council to meet its legal duty to house homeless households in Southwark wherever “reasonably practicable”.
9. However all local authorities are finding temporary accommodation increasingly difficult to procure to meet increasing demand, as the private sector rents increase and the number of landlords willing to let to households on benefits is reducing.
10. Securing private rented properties which are affordable to homeless households in Southwark is extremely (and increasingly) challenging. Private rents here are amongst some of the most expensive in London (and, indeed, the United Kingdom as a whole) and the majority of homeless households have low incomes. Currently (mid 2018) around 90% of the 2,700 households in temporary accommodation are in receipt of either Housing Benefit or Universal Credit. An earlier report from 2017 showed that 29 households were affected by the overall benefit cap and 17 households were in receipt of Discretionary Housing Payment, which is a temporary payment towards the shortfall in rent.
11. Table 1 shows the difference between allowable temporary accommodation Local Housing Allowance (LHA) rates (Inner SE London, rounded) and average advertised rents in Southwark in January 2021. The gap in the weekly rates is most pronounced for larger bedroom properties.

Table1:

Accommodation type	20/21 LHA rate	Effective monthly LHA rate	Median rents in Southwark (Jan 2021 ¹)	Gap between LHA and rents
Shared Accommodation Rate	118.87	515.10	700	-267.92
One bedroom	264.66	1,146.86	1,517	-562.84
Two bedroom	310.68	1,346.28	1,800	-559.67
Three bedroom	385.48	1,670.41	2,058	-556.8
Four bedroom	506.30	2,193.97	2,500	-607.07

12. For vulnerable households struggling to pay their rent, initiatives such as assuring private tenants' rent may help to retain their tenancies and avoid homelessness. In exchange, the households must show the council that they have taken steps to increase their incomes, including by embarking on training programmes.
13. In April 2017 the DWP Temporary Accommodation Management Fee (TAMF) scheme was replaced by the Flexible Homelessness Support Grant (FHSG). Under the TAMF, funding could only be used for intervention when a household is already homeless, rather than on preventing this happening in the first place. Funding that would have been expected under the TAMF for Southwark for 2017/18 was £909,289, under the FHSG Southwark received £3,616,000 for 2020/21.
14. The new grant will reduce the weekly rent element for households renting in self contained nightly rate and leased temporary accommodation by £40 per week. This will result in more affordable accommodation expenses for these households and the cost of this to Southwark will be recovered through the FHSG preventative solutions.
15. The overall benefit cap for non-working single people is £296.35 per week and £442.31 per week for couples and families in London.

¹ Median Advertised Rents in Southwark, from [Southwark Housing Market Trends Bulletin, January 2021](#)

16. Considerable work has been done to procure and to retain as much temporary accommodation within (or as close to it as practicable) Southwark as possible. The figures in Table 2 show the council's current usage of temporary accommodation for homeless households and its location. 58% of it is in Southwark and 42% is outside. The proportion of out of borough placements was 28% in mid 2014 which remained the same (28%) in mid 2017 but by August 2018 it has increased to 42%.

Table 2:

Location of Southwark's temporary accommodation				
	Occupied units (March 2017)	%	Occupied units (August 2018)	%
Southwark	1362	72%	1579	58%
Surrounding London boroughs (Lewisham, Lambeth, Bromley)	365	20%	592	22%
Other London boroughs	143	8%	523	19%
Non London boroughs	1	<1%	14	1%
TOTAL	1871		2,708	

Source: Internal data records (March 2017 and August 2018)

17. Rising rents and a very competitive market locally and in London is making it harder to procure new properties here or nearby. Frequently, given the current demand for rented property, when current leases end (both in Southwark and in Greater London more widely), landlords often move into new markets for which they can achieve higher rents. The result is that emergency nightly booked is being used for longer periods after a housing duty has been accepted; this is helping to drive up the cost of temporary accommodation (although it should be noted that costs of longer term leased accommodation are also increasing).
18. Rising homelessness levels across London and the resulting growth in demand have led to an increasingly competitive temporary accommodation market in London and the South East. Most London boroughs face similar challenges and are finding few properties with rents that are near LHA rates more difficult to procure.
19. The reduction in the household benefit cap for non-working households (from £26k to £23k in London for families and couples and from £18k to £15.4k for single people) will make it harder for all boroughs to find affordable private rented accommodation for non-working households. 347 households in Southwark are estimated to be affected as of January 2017.
20. Universal Credit full service (UC) was introduced in Southwark in November 2015 with expansion to cover most Southwark postcodes by November 2016. UC replaces working age means tested benefits and tax credits, including housing benefit. Households placed outside of Southwark in areas where UC has not yet been rolled out can continue to claim Housing Benefit. In 2016/17, the TA rent collection rate for Southwark's UC accounts was 77.6% compared to 91.5% for housing benefits accounts. Consequently, landlords are wary to take on UC households without additional guarantees or incentives.

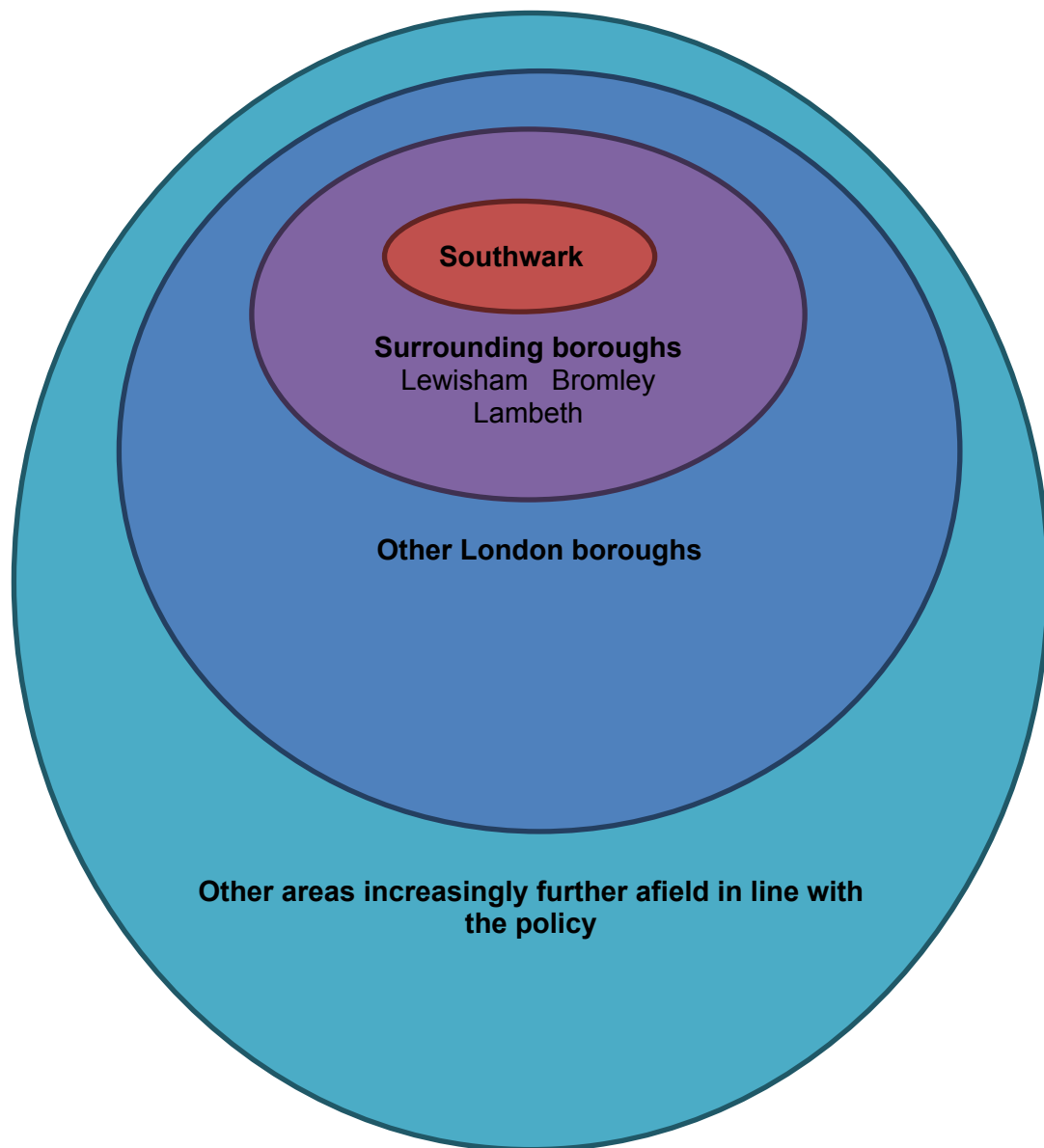
Section 3: Procurement principles

21. The following principles will apply when procuring properties for both temporary accommodation and private rented sector offers:
- The council will act to ensure it is compliant with all relevant legal obligations and have regard to all relevant legal guidance.

- The properties need to be affordable and sustainable in the longer term to the households that occupy them so they are within benefit levels and temporary accommodation subsidy rates. This will give homeless households the best opportunity to settle in an area and the lowest likelihood of them having to move again.
- The properties we offer to households will be suitable, compliant with health and safety specifications and be in a decent condition.
- The council's first priority will be to secure accommodation in Southwark, where it is not possible to secure good quality affordable accommodation in Southwark the council will next look in surrounding boroughs, then in other London boroughs and then in other areas increasingly further afield. The council will also work to secure accommodation for those households who wish to live outside of this area.
- Regard will be had to the Pan London Agreement on Inter-Borough Accommodation Placements dated 8 March 2011. This aims to ensure that where a borough is placing a household in temporary accommodation they will not offer the landlord more than the receiving borough would.
- Landlords may on occasions be offered incentives above temporary accommodation subsidy rates or LHA levels in order to procure properties to prevent homelessness - and where the practice will help secure longer-term savings. Where these incentives are offered the council will not offer more than the host borough if the properties are outside Southwark.
- The affordability of properties will be a key factor when procuring properties. Properties should be cost neutral to the council and within allowable subsidy rates or benefit levels in order to meet budgetary targets. Over the past two years, temporary accommodation has cost the council £3 - £4m per annum as it has not been possible to procure properties within the subsidy rate.
- Where the council is procuring properties outside Greater London it will, as far as possible, focus on more urban areas whose diversity so far as practicable reflects that of Southwark and so are likely to have more facilities and support networks for people from Southwark with particular protected characteristics. Evidence of the scope and range of employment opportunities will also be taken into account.
- To support delivery against these principles, research was undertaken by the council to better understand where there may be affordable properties. Chart 1 shows the areas that were looked at.

NOTE: The findings do not mean that properties can/will (or cannot/will not) be procured in these areas at any given point in time, as they only represent rental data at the time the research was carried out and procuring properties depends on a range of factors such as landlords' willingness to enter into agreements with the council and to rent their properties to homeless households. The data is however indicative of where the council should focus its efforts when seeking properties. They support the conclusion that it is unlikely to be reasonably practicable to procure enough private properties to meet need in and around Southwark and that the council will have to look further afield.

Chart 1: Private rental markets – areas researched



Section 4: Estimating and meeting need

22. Temporary accommodation demand and supply

Demand for temporary accommodation comes from new households that are accepted as homeless and households that need to move within temporary accommodation (because they are overcrowded, for example). Homeless demand in the longer term is difficult to predict as it is driven by a complex range of socio and economic factors, including changes to national legislation and policy. A national shortage of truly affordable housing and unaffordable rents in the private sector in and around Southwark remains an important driver. These factors have led to a continued increase in homelessness applications shown in Table 4. 2019-20 indicates that homelessness was plateauing before the impact of Covid-19 which will see applications reach a record close to 4,000.

Table 4: Homeless applications in Southwark

Year	Homeless approaches
2011-12	1,013
2012-13	1,049
2013-14	1,086
2014-15	1,822
2015-16	2,253
2016-17	2,354
2017-18	2,607
2018-19	2,953
2019-20	2,841
2020-21	2,884 (as at Dec 2020)

Source: Internal data

Table 5: Demand for social housing and supply in Southwark

Financial year	Households in temporary accommodation	Social lets
11/12	671	2,453
12/13	705	2,385
13/14	772	2,212
14/15	943	2,106
15/16	1,341	1,701
16/17	1,778	1,176
17/18	2,332	1,489

Source: DCLG P1E statistics and internal records.

23. Based on projected homelessness demand; impact of the impending Homelessness Reduction Act which may see more households in temporary accommodation and possibly for longer periods; natural churn within temporary accommodation as households move into social housing; anticipated lease ends as providers move into different markets; Right to Buy sales in the short term exceeding the Council's commitment to build 11,000 new council homes before 2043, it is estimated that the council needs to have a temporary accommodation portfolio of 3,000 – 3,500 properties until at least 2020/2021. The majority of these units will need to be suitable for families, predominantly with two bedrooms.
24. At the same time, the council has the objective of maintaining zero usage of nightly rate 'B&B style' temporary accommodation for families.
25. **Private rented accommodation for private rented sector offers**
The council is rolling out a policy to offer homeless households private rented tenancies to discharge the council's main housing duty (Appendix 2). This is intended to contain temporary accommodation demand and costs and to help give homeless households more sustainable, long-term housing options and avoiding the uncertainty of long waits for social housing.

Temporary Accommodation Supply Action Plan

26. Specific initiatives for procuring both temporary accommodation and private rented sector offers are set out below.

Table 6: Temporary Accommodation Supply Action Plan

Action	Target Number	Timescale	Impact
Temporary accommodation			
1. Work with Resident Services to make the best use of void properties in regeneration areas by using them for temporary accommodation for as long as possible.	Target monthly average number of units available with continued increase in usage of estate voids of 18.5% per year. 19/20 – 850 20/21 – 990 21/22 – 1180 22/23 - 1390	Projections up to March 2023	Growth in reduced cost TA
2. Continue to set aside 50% of one bed council voids for the use as temporary accommodation to reduce reliance on nightly rate accommodation.	10 per month (contributes to target numbers in Action 1)	Review in October 2021	Growth in reduced cost TA
3. Convert nightly paid Temporary accommodation into Leasing scheme usage.	100 per year	March 2022 Reviewable each year	Growth in reduced cost TA Greater pool of

			properties that meet the good Homes standard
Temp to perm - temporary accommodation to Assured Shorthold Tenancies.	50 per year	Negotiate and acquire units for TTP	Ongoing cost of TA for TA households until April 2022, then a reduction in TA numbers. Reduction of 50 by Nov 2022. Then have a further reduction year on year.
Promote the leasing scheme in order to procure new leased properties	100 per year	Per year to March 2025	Growth in reduced cost TA
Work with current providers to renew leases and renegotiate management fee.	100 per year	Per year to March 2025	Maintain existing units of reduced cost TA.
Buy back ex right to buy properties	40	By 2022	Increase LBS owned TA. Reduce TA costs
Explore further initiatives to obtain usage of empty properties. <ul style="list-style-type: none"> - Enhanced grants - Purchase and repair empty homes - Empty Dwellings management orders - Time limited leases on empty homes 	20 10 10 10 (Total 50)	Each year	Increase available properties locally. Greater supply of homes that meet the good homes standard and procured under the LHA rates.
Promote the councils Platinum Standard Criteria across landlords within Southwark.	0-20	Per year Scheme Currently under consultation and due to be concluded June 2021 after which point greater analysis will be available.	Increase the number of properties under the social lettings agency within the borough.
Explore Modular Housing in the borough	0-50	year. Agreement required to confirm the standard of Modular housing.	Increase the supply of temporary accommodation in the borough and reduce first stage nightly paid TA.
Total	1,830- 2,000	End of 24/25	

Private Rented Sector Offers and preventions			
Procure properties for PRSOs	350-1000	By March 2025 50-150 in 21/22 100- 250 in 22/23 100-300 in 23/24 100-300 in 25/26	Reduction in TA numbers.
Scheme to assist households independently finding prevention PRS accommodation with Self Help Finders Fee Scheme incentives	400 per year	Per year to 2024 Review in 2024.	Reduction in homelessness and TA numbers. Prevention numbers using these scheme does not directly translate into number of TA reductions as not all households will owed TA.
Develop process and information to offer and assist voluntary moves from TA to PRS. Including TA roadshow, direct mailing and priority through our Homeseach bidding scheme.	100 per year	Per year to 2025	Reduction in TA numbers.
Both			
Investigate innovative new models for temporary accommodation and private rented offers including plans to assure private tenants' rent and London-wide working with partners (Capital Letters).	n/a	Ongoing	Target to reduce usage of nightly rate TA and reduce total number of households in TA.
The aim is for these units to meet the diverse needs of homeless households and to reflect our demand profile so that 75% are family sized and every effort is made to procure wheelchair accessible/adapted properties (for temporary accommodation).			

APPENDIX 2

Private Rented Sector Offers Policy for Homeless Households

Section 1: Introduction

1. The Localism Act 2011 (sections 148 and 149) introduced provisions which enable the council to bring its statutory housing duty under section 193 of the Housing Act 1996 as amended (HA96) to an end, by making an offer of a private rented sector tenancy rather than a social housing tenancy.
2. Amendments under the Homelessness Reduction Act 2017 extend the powers in the HA96 to encourage local authorities to embed an approach to use private sector accommodation to discharge its Prevention Stage and Relief Stage duties to homeless households and households threatened by homelessness.
3. The aim of the Homelessness Reduction Act is to assist households with resolving their homelessness situation. Households that reject a private rented sector offer ("PRSO") during the Prevention Stage and Relief Stage would still have the same entitlement towards a full housing duty assessment.
4. This policy sets out the basis on which the council will use these powers.
5. The policy should be read in conjunction with:
 - The Temporary accommodation lettings framework – this sets out how homeless households will be prioritised for private rented sector properties in different locations.
 - The Accommodation Procurement Policy for Homeless Households – this sets out the council's approach to procuring private rented sector properties including those for PRSOs.

Section 2: Who private rented sector offers (PRSOs) will be made to

6. The council's policy is that a PRSO may be made to any homeless household where the law allows it.
7. Paragraphs 1 and 2 set out the legislative framework where this can be applied.
8. The council will use the powers set out in the Homelessness Reduction Act to make PRSO offers to Prevention Stage and Relief Stage homeless households and households threatened with homelessness.
9. The council will use the powers set out in the Localism Act to make PRSO offers to accepted cases i.e. statutory homeless households to which the council owes the full housing duty (Section 193 HA96).

10. The number of households that will be made a PRSO each year will depend on the supply of suitable private rented sector properties.
11. The following groups will ordinarily be excluded from PRSOs:
 - a. Households eligible for sheltered housing¹ - as it is unlikely that this type of housing can be provided in the private rented sector.
 - b. Households that need wheelchair adapted properties – as these can be hard to procure in the private rented sector.
 - c. Any household which the council determines would be unable to manage a private rented sector tenancy.
12. Exceptions may also be made for other households in respect of whom there is a compelling reason why a PRSO would not be appropriate. A decision will be taken after a consideration of each household's individual circumstances.
13. The following **general principles** will apply when making private rented sector offers:
 - **Two suitable offers will be made.** Duty will be discharged to households that refuse the second suitable offer although households will have the right to challenge this through a statutory review.
 - **Support to move may be offered.** In the main this will focus on households that are relocating from London and will be tailored to the individual needs of each household and may include help to: transfer any care and support packages, access to employment support, enrol children in schools, register with a GP and to access other local services. Support to other households that are not moving outside London may also be offered in some circumstances and the need for it will be assessed on a case by case basis.
 - The principles behind the accompanying *TA Lettings Framework* and the *Accommodation Procurement Policy for Homeless Households* will be applied when making private rented sector offers for available properties to appropriate households. Generally, this means we will only place households somewhere that is deemed suitable for them and we will seek to acquire properties within or as close to Southwark as is possible.

Section 3: Reviewing and monitoring the policy

14. The policy will be reviewed after it has been in operation for twelve months and the outcome will be reported to the Cabinet Member.

¹ These are generally people aged 60 or older but some young people may be eligible

APPENDIX 3

Temporary Accommodation Lettings Framework

1. Introduction

2. If you have approached Southwark Council for housing advice and assistance and the council has been unable to help prevent you from becoming homeless, despite your co-operation, then the next step could be that you are offered temporary accommodation (TA).
3. The requirements for the provision of temporary accommodation are set out in the Housing Act 1996 as amended ('HA96'). This policy also takes into account the statutory requirements on local authorities in respect of suitability of accommodation, including Suitability Orders, case law, and the Homelessness Code of Guidance 2006.

2. *Deciding on the right accommodation for you*

4. When you ask for help with housing, we ask about your circumstances so we can decide how best to help you. For example, we will ask about:
 - What factors are putting you at risk or causing you to be homeless.
 - Where your children go to school and whether they have any special educational needs
 - Whether your children have exams in the next six months
 - Whether you or your children have any health needs
 - What GP or hospital you are registered with and what treatment you are receiving
 - Whether you work and how much you earn
 - What benefits you are claiming
 - What local services you are accessing, particularly whether you are getting support from social services
5. When we offer you temporary accommodation, we use the information you have given us to match you up with a suitable property. Due to shortages of properties available within Southwark, unless you fall into one of the categories set out in the scheme as having priority for a Southwark home, it is likely that we will offer you accommodation outside the borough. We will always ensure that any home we offer you is suitable for your specific needs.
6. Wherever possible, the Council will avoid placing: families with dependent children; pregnant women; and, young people aged 16/17 in shared bed and breakfast accommodation. Where no other suitable

accommodation exists and such placements are necessary in an emergency situation, the Council will move these households to more suitable self-contained accommodation as soon as possible and within six weeks.

7. *The types of accommodation offered*

8. In most cases, while we work with households to resolve their homelessness, those eligible for temporary accommodation will initially receive Relief Stage TA. This is 'emergency' housing booked for you on a nightly basis, like a self-contained letting in the private rented sector. Where possible, this will be self-contained.
9. If we have still not resolved your homelessness situation during the 56 day Relief Period and if the Council decides it has a duty to house the household (section 193 HA96), you will be moved to longer-term accommodation as soon as a suitable property becomes available. You are likely to remain in this accommodation while you wait for your 'final stage' home which could be in the private rented sector or social housing i.e. a council home.

10. *How the council finds temporary accommodation*

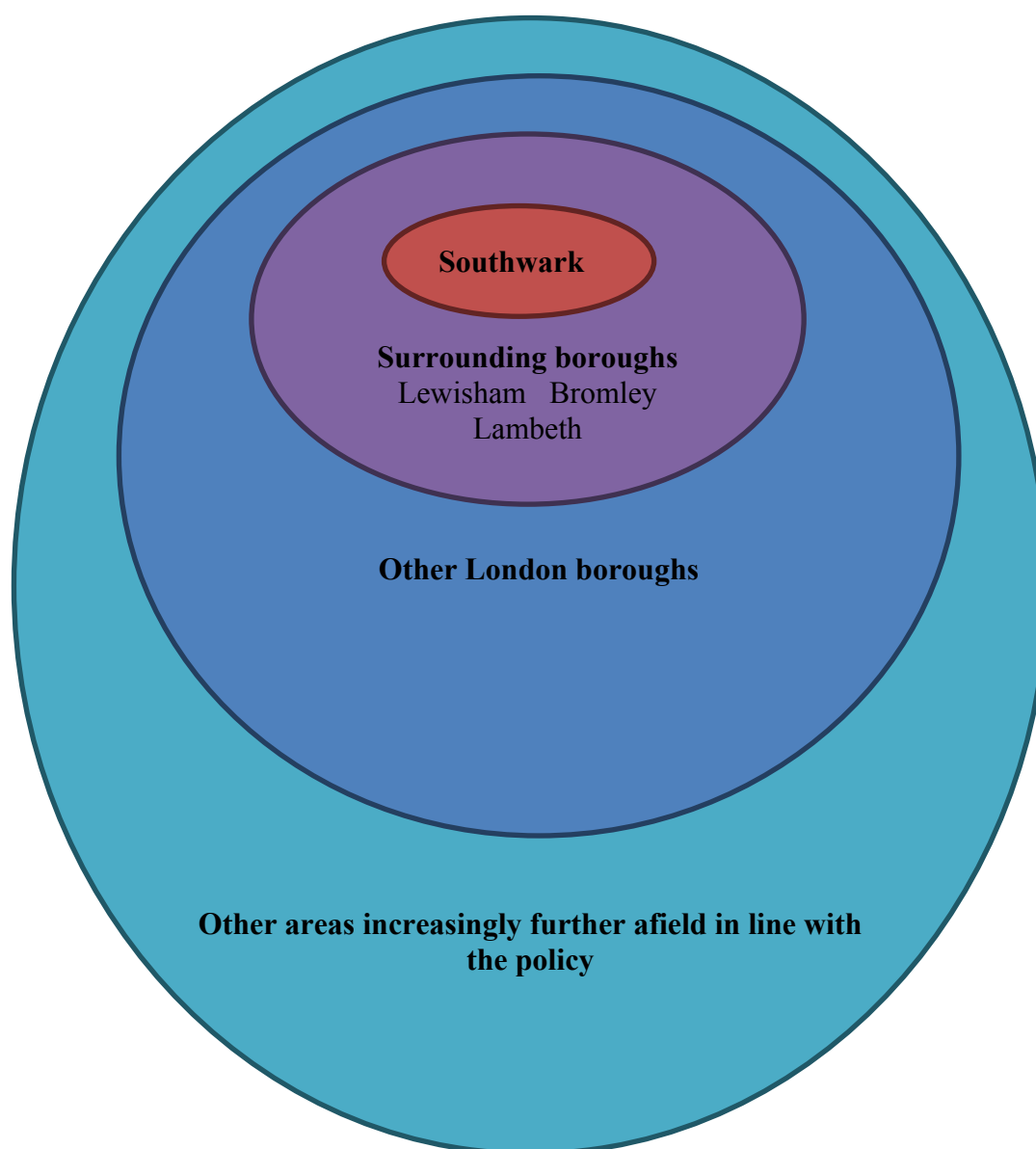
11. The council's **Accommodation Procurement Policy for Homeless Households** sets out how we obtain temporary accommodation and why an increasing amount of temporary accommodation is located out of Southwark.

12. *Where the temporary accommodation is located*

13. The council aims to offer accommodation within the borough. However, Southwark is one of the most expensive and highly sought-after places in the country to live and this means that there is not enough temporary accommodation available here for everyone. Where it is not possible to offer you accommodation in-borough, we will offer you a home that is as close as reasonably practicable to where you were living before you became homeless.
14. Since 2013, the number of households approaching the council because they are homeless has doubled. This is due to a number of factors such as Welfare Reform impacting households through the Benefit Cap, frozen Local Housing Allowance rates and the rising rental costs in London generally. Prior to this, in 2011/12 Southwark had 293 households placed in out of borough TA, but in August 2018 this increased to 1,129 placements although only 1% of these were outside of London (but within one hour's travelling distance from Southwark).
15. Our in-borough properties have people living in them already and they only become available when someone moves out. To meet rising demand, the council has had to obtain new temporary accommodation,

much of which is located out of borough but within reasonable travelling distance from Southwark. Therefore, in many cases, new households entering the system will be offered accommodation out of the borough.

Chart 1: Where we search for temporary accommodation



16. Deciding who gets which property on any given day

17. Every day, our Temporary Accommodation Placement team gets a list of all the properties that are available from our various suppliers. These could be 'nightly booked' properties that we use as emergency

housing, or longer term 'stage 2' accommodation, and they could be located in Southwark, in other boroughs or out of London.

18. Next, the team looks at the list of people who are currently waiting for an offer of temporary accommodation and matches each available property with the household whose needs match it. The team has a list of everyone waiting which includes information about how long they have been waiting and details of their particular circumstances and needs – such as what size, type, location of property would be suitable for them.
19. There are a huge number of factors to consider when allocating a property – how big is it, does it have stairs, where is it located, is it 'nightly booked' or 'longer term', how close it is to public transport links – the list goes on. Our team takes all these issues into account when making an offer. Whilst we would like to offer everyone a property in Southwark, there simply aren't enough homes available here to do that. Therefore, we usually offer any available in-borough properties to households who have been assessed as needing an in-borough offer. Level access properties will usually be offered to those who have severe mobility needs or where someone uses a wheelchair.
20. On the rare occasions that we receive a property that is in particularly short supply, such as a very large home or a longer term, in-borough home **and** we do not have a family who has been assessed for that type of home waiting, we may decide to hold that property back until a family that really needs it comes to our attention. This is because we know that it may be a long time before another property of that type becomes available again and given the heavy demand we face from homeless families who need housing, it is very likely that in the next few days a family will come in whose need for that particular home are greater than those waiting today.

21. **Examples**

22. Every household's circumstances are different and we assess everyone on a case by case basis taking into account the full range of needs that the household has. As noted, our aim is to offer properties in Southwark wherever we can but that in many cases, this may not be reasonably practicable due to a shortage of supply and requirements of suitability (including affordability).
23. The following are **examples** of the types of households who we would assess as needing to be housed in-borough, as needing accommodation within a specified travelling distance to Southwark and those who could be housed anywhere.

Band 1 – Southwark and adjacent boroughs

- Children with a Statement of Special Educational Need, Child In Need or Child Protection Plan receiving such a significant package of care from a variety of providers that transferring them elsewhere will create significant risk to the safety and sustainability of the caring arrangements.
- Households with complex needs who are engaged with services and where a move out of borough may severely disrupt this engagement thus creating significant risk to the safety and sustainability of the caring arrangements.
- Households who have a longstanding arrangement to provide care and support to another family member in Southwark who is not part of the resident household and would be likely to require statutory health and social support if the care ceased.
- Any other special circumstance will also be taken into account.

Band 2: in borough or the rest of Greater London

- Applicants who have been continuously employed in Greater London for a period of six months, and for 24 hours or more per week. Women who are on maternity leave from employment and meet the above criteria would also be prioritised for placements in Greater London.
- Applicants who have as part of their household, a child or children who are enrolled in public examination courses in Southwark, with exams to be taken within the next six months.
- Any other special circumstance will be taken into account.

Band 3: In borough or further afield

- Non-working households.
- Households with children at nursery, primary or secondary school, who are not sitting public exams.
- The household is receiving services locally but support could be transferred to another area without severely disrupting caring arrangements.

24. Vulnerabilities

25. Our scheme sets out how we determine who gets priority for in-borough temporary accommodation, when there is not enough available for everyone.

26. The council has a duty to have regard to the need to safeguard and promote the welfare of children. If your child has a statement of Special Educational Need or is currently the subject of a Child In Need or Child Protection Plan, we will liaise with Children's Services to ensure that any offer we make is suitable and meets your child's needs. Where your child is currently in a public exam year, we will ensure that any accommodation offered is within reasonable travelling distance of school so they can continue their studies uninterrupted.

27. We also have a monthly liaison meeting with Children's Services where we discuss the needs of those families we know are threatened with homelessness so we can jointly plan how best to meet their housing and support needs in the future.
28. The council recognises that in many cases it may be in the best interests of children to remain at existing schools where they are settled. Unfortunately due to the difficulties in procuring accommodation referred to above it is not always possible to offer accommodation which avoids the need for parents to consider moving their child's school and we have to prioritise the needs of the most vulnerable children.
29. If your children are not sitting a public exam and do not have any special needs, you may decide that moving your children to a school nearer your temporary accommodation may be preferable to travelling back and forward. Section 14 of the Education Act 1996 requires that all local authorities provide school places for all resident children. Once moved to your new address, you can apply for a school place from the local council – in most cases the relevant forms are available on the council's website. If you need help with this, please tell us and we will be happy to assist.

30. *Temporary accommodation offers and refusals*

31. Applicants will be given two offers of suitable interim or longer-term temporary accommodation and they will be asked to accept the second offer straight away. There is no obligation upon the Council to enable applicants to view the accommodation prior to acceptance. In making the offer, the household's individual circumstances will be considered, taking into account the factors set out in section 2 of this policy and the Council's criteria on out of borough placements (section 6)
32. If an applicant is dissatisfied with an offer of temporary accommodation (which may include out of borough placements), they can lodge a complaint and provide their reasons. This applies to new applicants to whom the Council has an interim duty to accommodate under Section 188 (1) of the HA96, those where the Council exercise their discretion to accommodate under Section 188 (3) of the HA96, as well as those seeking a transfer from existing TA.
33. If an applicant refuses the second offer and the Council is satisfied that the offer was suitable then applicants will not be offered further accommodation and the Council may discharge its temporary accommodation duty towards them and the households will be required to make their own arrangements. There is no right of appeal against the suitability of accommodation offered to applicants under Section 188 HA96 (although they can apply for judicial review through the courts)

34. This also applies to all customers who are provided with temporary accommodation by the Council pursuant to its relief duties under S.189B HA96.
35. If an applicant is accepted as homeless and is owed a rehousing duty under Section 193 of the HA96, they can request a statutory review of the offer pursuant to Section 202 HA96 of accommodation (including subsequent offers where they are required to move to) within 21 days of the offer. The applicant can make representations in support of their review and the Council will consider the reasons given and undertake further enquiries as necessary. If the Council accepts the reasons for the review and agree that the offer is unsuitable, the offer will be withdrawn and a further offer of accommodation will be made. If a customer rejects an offer of accommodation and the Council determines that the accommodation is suitable, the Council will discharge its full housing duty towards the applicant and they will be required to make their own arrangements.
36. If the applicant is resident in emergency accommodation, they will usually be asked to vacate the property within 7 days and advised that no further assistance will be provided. If they are already in longer-term temporary accommodation, the current housing provider should be advised that the duty has been discharged.
37. Where applicants whom the Council has accepted a s193 duty refuse a suitable offer and submit a review request, they will only continue to be accommodated during the review period in exceptional circumstances. Each case will be considered on an individual basis, taking into account the overall merits of the review request, any new information or evidence that may affect the original decision, and the personal circumstances of the applicant and the potential impact of the loss of accommodation.

38. *Properties for rent on property search websites*

39. You would have been issued with a Personal Housing Plan (PHP) when you approached our service for assistance. The PHP is a live document that sets out what steps you can take to prevent homelessness and may include advice about where to look for properties to rent.
40. If you would like to move to a private sector flat, please talk to us about this as we may be able to help you with a deposit and checking that the property is appropriate and safe.
41. Southwark has on-going relationships with a variety of temporary accommodation providers and the majority of our available stock comes from these providers. Procuring temporary accommodation in this way allows us to obtain 'economies of scale' and best value from these arrangements.

42. We do not do 'bespoke searches' of property websites when trying to find temporary accommodation for our clients. This is not reasonably practicable given the inefficiency of this method. For example, we would have to check each property for quality before offering it to you, and most private landlords are unwilling to afford us the time to do this. Many landlords are not willing to let their properties to local authorities or those claiming benefits. We tend to find that many properties advertised are not actually available – rather the provider is offering an 'example' property to the market to attract the prospective tenant to their service. Finally, the majority of private rented accommodation available on the open market in Southwark very expensive and beyond the budget of those claiming benefits.

43. *The Southwark Choice Based Lettings flyer*

44. The properties you may have seen advertised via our Choice Based Lettings are 'final stage' social rented homes. When we accept a duty to provide you and your family with accommodation, we add you to a housing register for these homes. You get placed in a priority band based on your circumstances and use this priority to 'bid' for the properties you see advertised. Each property is then allocated to the bidder with the highest priority who has been waiting the longest.

45. There are not enough of these homes to go around and most people wait several years before they can be offered one. Your temporary accommodation is where you live while you wait. If we offered you one of these properties immediately, you would be jumping the queue of people who had been waiting much longer than you, and they may never get a permanent home. Obviously this would be very unfair.

46. If you would like a paper copy of any of the policies referred to here, please contact Housing Solutions on 0207 525 4140 or by email housingsupply@southwark.gov.uk.

11 January 2021



APPENDIX 4

Southwark's Accommodation Procurement Policy for Homeless Households, Private Rental Sector Offer of Accommodation Policy and Temporary Accommodation Lettings Framework:

Equality and Health Analysis

11 January 2021

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates		Accommodation Procurement Policy for Homeless Households, Private Rental Sector Offer of Accommodation Policy and the Temporary Accommodation Lettings Framework			
Equality analysis author					
Strategic Director:		Michael Scorer, Strategic Director of Housing and Modernisation			
Department		Housing and Modernisation	Division	Customer Experience	
Period analysis undertaken		September 2018 – December 2020			
Date of review (if applicable)		January 2022			
Sign-off	Richard Selley	Position	Director, Customer Experience	Date	

11 January 2021

Section 2: Brief description of policy/decision/business plan

1.1 Brief description of policy/decision/business plan

This Equalities Impact Assessment (EIA) forms part of the review of the EIA assessment completed on the 27 September 2018. The initial assessment examined the impacts (individual and cumulative) of a suite of new Southwark Council policies subsequently approved on the 10 July 2019, providing the framework for the use of private rented accommodation to help meet the council's duties to homeless households.

These policies included the following:

- **Private Rented Sector Offers (PRSO) Policy for homeless households** – the policy sets out the council's intention to make more homeless households offers of private rented accommodation to discharge its rehousing duty to them.
- **Accommodation Procurement Policy for homeless households** – this explains the council's temporary accommodation needs, issues in procuring temporary accommodation and the principles the council will follow when procuring rented properties, both for temporary accommodation and private rented sector offers.
- **Temporary Accommodation Lettings Framework** – this sets out how households will be prioritised for properties, both for temporary accommodation and private rented sector offers, in different locations.

Full details of the policies can be found via the link below:

<http://moderngov.southwark.gov.uk/ieDecisionDetails.aspx?ID=6889>

At the point of the initial EIA, the assessment was based on the available information prior to implementation, but following over 18 months since implementation, we are now aiming to put in place amendments to the existing policies.

The amendments to the existing policies aim to increase access to affordable and suitable accommodation that meets our Good Homes Standards. The new policies:

- remove restrictions on geographical limitations for procuring good quality homes,
- Confirm an approach to offer shared temporary accommodation for singles.

Legal framework

Within the previous EIA assessment, the legal requirements were set out confirm the operating perimeters applicable when devising the policies.

This includes the Housing Act 1996 in which local housing authorities have duties to secure suitable accommodation for homeless people with a local connection and with a

11 January 2021

priority need, as defined in the statute. Where permanent housing cannot be provided immediately, homeless households are placed in temporary accommodation.

The Localism Act 2011 gave local authorities the power to discharge this main housing duty to homeless households through an offer of an assured shorthold tenancy in the private rented sector, without any requirement for applicant's prior agreement. This change effectively ended the previously direct link between Parts 6 and 7 of the Housing Act 1996 because where a suitable PRSO is made by the council, the applicant no longer has priority for social housing. Until now, the council has only offered private rented tenancies to a small number of households, and with their consent.

The Homelessness Reduction Act 2017 also places Prevention and Relief duties on local authorities which can also include the provision to secure accommodation.

The 1996 Act and supporting regulations require local authorities to place homeless households in borough wherever "reasonably practicable". Location is one of the factors that must be taken into account when considering whether temporary or permanent accommodation provided to meet any of the homelessness duties is suitable.

The proposed amendments will continue to comply with the relevant legislation, government guidelines and caselaw.

Reasons for the policies existing policies

Overall these policies are intended to ensure availability of enough suitable private sector accommodation for homeless households to allow the council to meet its duties at a cost that it can sustain and which are affordable to homeless households, against the background of an increasingly difficult market, marked by rapid increases in rent costs. Temporary accommodation already costs the council over £3 million per year, at a time when, in common with other local authorities, it faces medium-term financial pressures. This means that it cannot sustain an uncontrolled increase in costs. The policies will have the effect of off-setting the impact of continuing high numbers of homeless households presenting to the council and the loss of social rented supply.

Modelling suggests that without the policies the cost of temporary accommodation could increase to £7.6m in 2021/22. The policies are also intended to provide more certain and sustainable outcomes for homeless households, enabling them to secure suitable private rented housing more quickly rather than waiting in temporary accommodation for many years (and often subject to multiple moves over this time) until a social home becomes available. For other households, this approach will help free up resources that can be used to help prevent homelessness from arising in the first place – the approach being given increased priority locally, regionally and nationally.

Details of each of the policies is given below:

Private rented sector offers (PRSO) policy

11 January 2021

The private rented sector offers policy is needed to set out clearly and transparently how the council will use its powers under the Localism Act. The policy sets out council's policy intention to make more private rented sector offers to homeless households, where the law allows it. Homeless households might either be offered a private rented tenancy as soon as they are accepted as homeless or from their temporary accommodation – meaning they will spend less time in temporary accommodation. This will help to contain temporary accommodation costs which are described above. Another of the policy's objectives is to help improve outcomes for homeless households. Currently, they can wait for more than 3 years in temporary accommodation for social rented housing (these waits tend to be longest for households requiring two or more bedrooms). This temporary accommodation is increasingly out of Southwark (currently 42% is outside Southwark).

Households often have to move a number of times within temporary accommodation – as an illustration, of a random selection of ten households currently in regeneration estate 'second stage' temporary accommodation at the time this assessment was completed, households moved on average three times, although some move more times than this. The nature of temporary accommodation therefore means it can be difficult for households to settle in an area, establish local links and get on with their lives. The policy (which will be backed by a package of support for the households concerned) is intended to help ensure that the offer of a private tenancy will mean that households can move into more settled accommodation that is affordable to them more quickly, enabling them to settle in a neighbourhood, engage with local services and opportunities and plan their futures with more certainty.

The current long waits in temporary accommodation are due to a significant mismatch between the supply of social housing and demand for it, at the beginning of 2017 there were 10,120 households on the housing register for social housing with around 1,500 of these being homeless households in temporary accommodation. Only around 1,000 social rented housing units became available last year in Southwark and the nature of the social housing stock available is that a proportion of this is comprised of one bedroom units, while the great majority of homeless households (94%) require two bedrooms or more.

The council seeks to maximise provision of new affordable housing in the borough, including through its ambitious estate regeneration programme, but the scarcity and cost of sites in Southwark restricts its ability to meet increasing demand in this way. These supply and demand factors are unlikely to improve as homeless acceptances are forecast to remain high at least in the medium term (primarily as a result of changes to the benefit system) – at around 850 to 950 each year.

Social rented supply is also likely to reduce, at least in the short term, due to a number of national policies mainly imposed by the Housing and Planning Act 2016, such as the extension of right to buy to housing association tenants and introduction of annual payments to government based on anticipated sale of local authority higher value voids to help fund it.

11 January 2021

Accommodation Procurement Policy

This policy is needed to provide an action plan for procuring enough accommodation both for PRSO and for temporary accommodation and to meet housing needs for homeless households. It is also needed to set out the principles the council will follow when procuring properties. Having such clear key principles is needed because although the council will, wherever possible, seek to acquire affordable accommodation within Southwark and in neighbouring boroughs, this is becoming increasingly difficult, due to the lack of properties within benefit levels and subsidy thresholds.

Research has confirmed the limited supply of properties available within the resources available (see below) both for PRSO and for temporary accommodation with in Southwark and London. Since this research was carried out, according to landlord insurer HomeLet, rent prices in London dropped by 1.2% in 2016, the first annual drop in eight years. It was also noted that rent increased across England by 0.4% in 2016, the lowest annual increase for seven years. This slowdown was associated with the economic impact resulting from the Brexit referendum decision and general affordability.

A key principle for the procurement of temporary accommodation is that it is affordable to the council within relevant subsidy levels, in order to help to contain temporary accommodation costs and to prevent them from rising excessively.

Another key principle is that rents need to be affordable to low income people within benefit levels as otherwise it will not be sustainable to them in the long term. Both of these considerations are likely to become increasingly pressing if private sector rents continue to rise and the tendency for landlords to let to more affluent tenants continues. They are likely to be further exacerbated by the introduction of Universal Credit which has now been fully rolled out across Southwark with the exception of a few micro post code areas.

The policy also sets out other factors which will determine where properties are procured – these are needed to ensure the locations are suitable for homeless households and have health, social and employment opportunities.

Temporary Accommodation Lettings Framework

This framework replaces the existing Temporary Accommodation Lettings Framework and Frequently Asked Questions. This revised policy is designed to compliment the Accommodation Procurement and PRSO policies and is needed as the amount of housing available for temporary accommodation (and for private rented sector offers) in Southwark and Greater London is likely to continue to decline while costs are likely to continue to increase. Although, as set out above, the council aims to place households in or as close to Southwark as possible, where sufficient affordable accommodation is not available, it will have to seek alternative accommodation further afield.

The council therefore needs to prioritise households for properties in different locations in ways that take account of their needs. The particular focus of the policy is to

11 January 2021

prioritise allocation of accommodation in or near Southwark to households with the greatest need to be housed there. These locations are grouped in bands:

- **Band 1:** Southwark and adjacent boroughs
- **Band 2:** Greater London
- **Band 3:** Further afield.

The priority categories are designed to apply to those with compelling needs to be accommodated close to Southwark or within Greater London. The needs of children and disabled people and by extension those who care for them are a particular focus of the priority categories.

Alongside this, some priority is given to working households. The council will also consider individual compelling claims to be entitled to locational priority which do not fit into the defined categories, on their own merits. Further, any offer of accommodation under the homelessness legislation is subject to an individual suitability assessment. These factors provide a safety net which allows for the consideration, for example, of cultural reasons for a particular placement which may affect certain ethnic minority households.

Proposed changes

The general trend of increasing number of homeless approaches to the council has been further exasperated as a result of the Covid-19 pandemic. The proposed changes have been suggested in order to meet the needs of our residents while also reducing financial expenditure.

Appendix 1: Accommodation Procurement Policy for Homeless Households

Current policy text	Amendment
4th bullet point under paragraph 21: “The council’s first priority will be to secure accommodation in Southwark, where it is not possible to secure good quality affordable accommodation in Southwark the council will next look in surrounding boroughs, then in other London boroughs and then in other areas within the M25. The council will also work to secure accommodation for those households who wish to live outside of this area.”	Replace text with the following: “The council’s first priority will be to secure accommodation in Southwark, where it is not possible to secure good quality affordable accommodation in Southwark the council will next look in surrounding boroughs, then in other London boroughs and then in other areas increasingly further afield . The council will also work to secure accommodation for those households who wish to live outside of this area.”

Appendix 2: Private Rented Sector Offers Policy for Homeless Households

Current policy text	Amendment
3rd bullet point under paragraph 13: “Accommodation will be in or close to Southwark. Unless the household requests a move to a	Remove text

11 January 2021

location that is further away, the accommodation offered will be within 90 minutes reasonable journey time by public transport from the address the household was living at before they became homeless and will also be within the M25. Travel times will be measured using the Transport for London online Journey Planner.”

Appendix 3: Temporary Accommodation Lettings Framework

Current policy text	Amendment
paragraph on page 3: “Unless you request accommodation in a location that is further away, we will offer you accommodation within 90 minutes reasonable journey time by public transport from where you were living before you became homeless, this will also be within the M25 area. Travel times will be measured using the Transport for London online Journey Planner.”	Remove text
page 3 “Other areas within the M25”	Replace with: “Other areas increasingly further afield in line with the policy”
7th bullet point on page 5: “90 minutes travelling distance by bus of their school or college, alternatively where the journey is possible within 90 minutes by train, tube or tram but not by bus the council will meet the cost difference between the bus fare and the fare using the train, tube or tram”	Replace with: “Applicants who have as part of their household, a child or children who are enrolled in public examination courses in Southwark, with exams to be taken within the next six months.”
6th paragraph on page 6: “If you wish to keep your children in their current school the council will seek to offer you accommodation within 90 minutes journey time by public transport from their school. Where this journey to take the children in your household to and from this existing school is possible within 90 minutes by train, tube or tram but not by bus the council will pay the difference in cost between the bus fare and the fare using the train, tube or tram”	Remove text

A further policy change is also proposed to confirm an approach for providing shared nightly rate accommodation for single homeless households. This provision will be in line with legislative requirements and guidance, with *The Homelessness (Suitability of Accommodation) (England) Order 2003* and *The Homelessness (Suitability of Accommodation) (England) Order 2012* of particular relevance. The 2003 Order states that families should not reside in shared B&B for more than 6 weeks, this includes

11 January 2021

pregnant households. However, this ruling does not extend to single people.

Access to shared temporary accommodation for single households makes a significant difference to the cost pressures on the General Fund budget.

What is being assessed

The following aims to assess the impacts of the amendments from the existing policy applied. We wish to identify any negative impacts on households and how this can be mitigated.

11 January 2021

Section 3: Overview of service users and key stakeholders consulted

Service users and stakeholders	
Key users of the department or service	<p>The EIA completed in Nov 2018 included contact with all customers who approach the service for housing advice, assistance and support through the related homelessness legislation.</p> <p>Legal representatives who work in partnership with the council related to the homelessness legislation and case law.</p>
Key stakeholders were/are involved in this policy / decision / business plan	<p>Information taken from the EIA Nov 2018 included Housing Solutions conducted best practice visits to Camden, York and Hart Councils. These councils have already implemented a policy to discharge duty into the private sector. 2018 visit to Havering peer review who have also implemented this policy. We have since completed further visit to Barking and Dagenham and Haringey whom also operate such policies and was considered when developing the policies.</p> <p>Advice by Arden Chambers. Specialist expertise opinion provided on the placement of homeless applicants out of borough.</p> <p>All Housing Association partners, Citizens Advice Bureau, Shelter, community organisations, local residents, Area Tenant Forums, Children's & Adults' Services, and Southwark Legal Advice Network. Ongoing briefings and feedback will be sought from all partners as part of the yearly review of the policies.</p>

11 January 2021

Section 4: Pre-implementation equality analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken.

The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that health is given special consideration, as it is the council's declared intention to reduce health inequalities in the borough. The Public Health Team can assist with research and data.

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>As highlighted within the previous EIA, there are some age range of the lead household member makes up the majority of homeless approaches and would therefore be subject to the be affected by changes to the policy.</p> <p>Previously we had reported the age range of applicants making an approach consisted of households aged between 25-44. There is no significant change in this proportion of approaches.</p> <p>Conversely, those aged over 65 are under-represented and so less likely to be directly affected. Households with children (or expecting a first child) are disproportionately represented among homeless households (85%).</p> <p>The proposed changes will positively benefit single residents aged between 18-35 as they will have greater access to a supply of accommodation that the council can offer. Conversely the council will be exercising the discharge of duty ability across all age ranges through the offer of one suitable offer.</p> <p>Age - Children The previous EIA identified children will potentially be negatively affected if they need to move outside of Southwark and London. This was due to the potential requirement to start new schools, which can be disruptive particularly if they are at key exam stages. The policy and legislation however requires children taking exams not to be placed where this would affect their ability to attend schools. This also includes those attending specialist schools.</p> <p>Age – Older people As identified in the previous EIA, older people eligible for Sheltered housing will not usually be made private rented offers. However older people could be offered temporary accommodation outside Southwark and London until this type of housing is available (although generally waits are much shorter). They may potentially be negatively impacted by this, if they have long established links to the local area and also as they are more likely to receive care and support packages which would need to be transferred. Also they may be more likely to receive informal support, possibly from family members, which might be harder to sustain at a distance. The data shows that people in these age groups are significantly under-represented</p>	<p>No current data available.</p>

11 January 2021

<p>among homeless people however.</p> <p>Since the introduction of the policy in July 2019, a small proportion of residents of pension age have been placed in private accommodation. However it is not imagined the amended policy will negatively impact this group.</p> <p>It is anticipated the Good homes standard will have a positive impact upon households across all age groups as they will be able to benefit from a better standard of property.</p>	
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Southwark Demography Factsheet May 2015.</p> <p>www.southwark.gov.uk/assets/attach/5718/JSNA-Factsheet-2017-Protected-Characteristics-20171130.pdf</p> <p>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</p>	<p>No current data available.</p>
<p>Mitigating actions to be taken</p>	
<p>Age – Children</p> <p>Some children and families will be prioritised for in borough/adjacent borough accommodation, including:</p> <ul style="list-style-type: none"> Households where at least one of the children has a Statement of Special Educational Needs or an Education, Health and Care Plan, is receiving education or educational support in Southwark and where it is demonstrated that a placement would be significantly detrimental to their well-being Households with a child where Southwark Family Services has demonstrated serious concerns about the child and is working with them intensively Households where there is a recommendation through a joint assessment with Children's and Adult's Services Households which include a registered Southwark Council approved foster carer who is fostering a Southwark looked after child Households which (a) include a Southwark Council approved person who is caring for a Southwark looked after child, (b) include a Southwark child that is subject to a Southwark Special Guardianship Order or (c) have a private fostering arrangement with a carer resident in Southwark where they have notified the council <p>Some children and families will be prioritised for accommodation in Greater London, where a child is at their final year of Key Stage 4 (generally Year 11) or in Key Stage 5 (A levels or equivalent Level 3 vocational courses, such as BTECs, or GCSE re-sits in English and Maths) at a school or further education college in London.</p> <p>Any special circumstances demonstrating a compelling need for accommodation in a certain area will be considered and this might</p>	<p>None at this point. Will be reviewed as appropriate.</p>

11 January 2021

<p>particularly benefit children.</p> <p>Resettlement support will be offered for some private rented offers. This could include help to enrol children in new schools and to find nursery places. The Housing Solutions service has recently been awarded a Customer Service Excellence renewed accreditation and we have specialist officers to aid support and mitigate the effects of moving outside of the district and into private sector accommodation.</p> <p>Support will also be offered to households moving into temporary accommodation outside London and as above this could include help to enrol children in local schools and to find nursery places</p> <p>Age – Older people Some older households will be exempt from private rented sector offers i.e. those that are eligible for sheltered housing and disabled households needing wheelchair accessible housing</p> <p>The focus on procuring properties in the South East and with good transport connections to London, where possible, will help people in temporary accommodation maintain their location connections and this might be particularly important for older people</p> <p>Support will also be offered to households moving into temporary accommodation outside London and this could involve help to transfer any care and support packages.</p> <p>The council are building a number of older person's and sheltered accommodation for the aging population. Therefore this will increase the options available to this age range and therefore the changes in the policy will not affect this group.</p> <p>All residents placed in temporary accommodation or placed in private accommodation provided by the council will have a suitability assessment completed which will help to identify any of the above.</p>	
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<p>Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.</p>	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>As identified within the previously EIA completed in Sept 2018, only a small proportion of accepted homeless households have members needing a wheel chair adapted property or a level access property. Overall, less than 9% of homeless households have members with a physical disability which impacts on the type of properties needed. Within the period since from August 2019- Dec 2020 this figure has reduced to 8%. During the same period, the total applicants approaching with mental health or a learning disability is similar with 9%. This data relates to the main applicant and therefore it is likely that household members could be under reported. This is also reflected in the data as the majority of the applicants with mental health or learning disability are single applicants.</p>	<p>A national survey conducted by Shelter of 2,000 people in temporary accommodation¹, found that more than half said that they were suffering from depression and depression and other mental health problems were two of the most common health conditions reported.</p>

¹ http://england.shelter.org.uk/_data/assets/pdf_file/0012/40116/Living_in_Limbo.pdf

11 January 2021

<p>Statistics in the Census 2011 shows that Southwark ranks in the lowest 20% for people reporting daily activity limitations. It is grouped as having only 11.2% – 14.6% population reporting daily activity limitations. This could be partly down to its relatively young population.</p> <p>Nationally, 53% of working age disabled people are in work compared to 70% of non-disabled people. Employment rates vary greatly according to the type of impairment a person has, for example people with severe or enduring mental health conditions have the lowest employment rate of any of the main groups of disabled people. According to the Office for Disability this is 16% for people with mental health issues compared to 43% for all disabled people of working age.</p> <p>As noted above, the priority categories have a particular focus on disabled people with compelling needs to be accommodated close to Southwark or in London and those who care for them.</p> <p>It is anticipated the Good homes standard will have a positive impact upon households who have a disability as they will be able to benefit from a better standard of property.</p>	
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Homelessness Statistical Review March 2017, Age profile of statutorily homeless households (derived from P1E data).</p> <p>Census 2011.</p> <p>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</p>	<p>Shelter – Living in Limbo²</p>
<p>Mitigating actions to be taken</p>	
<p>We have reviewed the suitability assessment process to ensure all placements have a robust assessment completed when placed in temporary accommodation or placed in private accommodation provided by the council. This will help to ensure any of the policy has been fully implemented and reduce unintended consequences of unsuitable placements. This must be audited at regular intervals.</p> <p>The private rented sector offers policy excludes some disabled households who wouldn't be able to manage a private rented tenancy (for example, those who may have care and support needs or a mental health condition which prevents them from managing a tenancy) and disabled households with members needing wheelchair accessible housing</p> <p>Some people with particular health problems or disabilities will be prioritised for in borough/adjacent borough accommodation, these include:</p> <ul style="list-style-type: none"> Households where at least one member has a severe health condition or disability (including a severe mental health condition) 	

² http://england.shelter.org.uk/_data/assets/pdf_file/0012/40116/Living_in_Limbo.pdf

11 January 2021

<p>that requires intensive and specialised medical/mental health treatment/ aftercare that is either (a) only available in Southwark or (b) where a transfer of care would create a serious risk to their safety or the sustainability of the treatment or care</p> <ul style="list-style-type: none"> Households where at least one member is receiving support through a significant commissioned care package or package of health care options provided in Southwark, where a transfer of care would create a serious risk to their safety or the sustainability of the care <p>Some carers, and people being cared for, will be prioritised for in borough/adjacent borough accommodation</p> <p>Since the introduction of the first policy and the completion of the initial EIA, the services have recruited additional Resettlement staff within the service.</p> <p>Resettlement support is offered to households being made private rented offers who are relocating out of London, and where needed where they are moving from Southwark to another London borough. This support could include help to transfer care and support packages</p> <p>Support is also be offered to households moving into temporary accommodation outside London and as above this could include help to transfer care and support packages.</p> <p>The Housing allocations scheme priorities households with physical disabilities to obtain accessible social housing. This is restricted to eligible households and therefore this will aim to meet the required need, limiting the need for a household with physical disabilities to move into private accommodation or temporary accommodation.</p> <p>While it is recognised the Good homes standard will generally be a positive change, there maybe instances where the procurement process may involve additional amendments which would be suitable for the household. This will be processed on an individual basis.</p>	
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Gender reassignment - The process of transitioning from one gender to another.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>The council has begun including equalities questions about the sexual orientation and gender reassignment of the lead applicant for homeless households in the homelessness application. However, applicants can decline answering these and as this was only implemented in April 2017, it is too early to analyse any data collected. Indeed only 3 households whom approach the service in 2020 are listed as having undergone gender re assignment.</p> <p>There are no specific issues from the proposed changes which are felt could discriminate or disadvantage residents whom have undergone gender reassignment other than general matters detailed elsewhere in this report, and the significant reduction in the availability of affordable in Southwark.</p> <p>However that being said, transgender customers may be particularly at risk of housing crisis and homelessness arising from transphobic reaction by</p>	None identified.

11 January 2021

family, neighbours and members of the local community. It is anticipated the Good Homes standard will have a positive impact upon households whom have undergone gender re assignment as they will be able to benefit from a better standard of property.	
Equality information on which above analysis is based.	Health data on which above analysis is based
Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021 Hcllc System internal data: August 2019 – Dec 2020.	No current data available.
Mitigating actions to be taken	
<p>The focus on procuring properties in more urban areas, where their diversity as far as possible reflects that of Southwark, might help to ensure there are facilities for transgender people, which may be more likely where the population is more diverse. In addition the focus on also procuring properties in areas with reasonable transport links to London might help transgender people in particular to continue to use local support services if there are fewer where they live.</p> <p>Resettlement services provided to all residents placed into private and temporary accommodation to help link up with the relevant support.</p> <p>The housing solutions service has entered into a partnership with Stonewall Housing dedicated to provide support and advice to residents from the LGBTQ community. This will aim to promote the services and ensure any resident whom has gone through gender reassignment do not face any barriers to access social housing through the allocations scheme.</p>	None at this point. Will be reviewed as appropriate.

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. **(Only to be considered in respect to the need to eliminate discrimination.)**

Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>Our data shows that there are very little residents whom approach our service whom are married or have a civil partnership. Our current snapshot of data shows there are only 4% of households. This has not changed since the implementation of the policy in 2019.</p> <p>A joint income household will likely be able to have more disposable income. Therefore income assessments will take this into consideration when determining where an affordable property would be available in the private sector.</p>	None Identified

11 January 2021

<p>Lone parents are disproportionately affected by homelessness compared to their share of the population so are more likely to be affected by the policies.</p> <p>The proposed changes to the policy are not likely to have an impact upon this specific group.</p>	
Equality information on which above analysis is based	
<p>66% of statutory homeless households were single parent households.</p> <p>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</p>	
Mitigating actions to be taken	
<p>Housing Solutions service has retained a Customer Service Excellence renewed accreditation and we have specialist officers to aid support and mitigate the effects of moving outside of the district and into private sector accommodation by ensuring households have someone to contact regarding any issues.</p>	

<p>Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.</p>	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>As identified under the previous EIA, a significant number of lead applicants from accepted households are pregnant women.</p> <p>A potential move outside of the borough for a pregnant mother or mother on maternity leave may impact upon services received from the health service. This will likely require services to be transferred to the new area if moved away from the area.</p> <p>Additional properties identified further afield will assist in clients being offered permanent accommodation at an earlier stage and spend less time in temporary accommodation.</p> <p>In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of pregnancy or maternity.</p> <p>It is anticipated the Good homes standard will have a positive impact upon households with a pregnant woman or a woman on maternity leave as they will be able to benefit from a better standard of property.</p>	<p>None identified.</p>

11 January 2021

Equality information on which above analysis is based	Health data on which above analysis is based
Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021 Hcllc System internal data: August 2019 – Dec 2020.	No current data available.
Mitigating actions to be taken	
<p>Every offer of accommodation will take into account the household's individual circumstances and suitability of the accommodation offered to meet their needs. Any special circumstances will be taken into account when making offers to households – taking into account if there is a compelling need for the accommodation to be in a particular location</p> <p>Resettlement support will be offered to households being made private rented sector offers where they are relocating out of London and where needed when they are moving from Southwark.</p> <p>Support will also be offered to households moving into temporary accommodation outside London.</p> <p>The completion of a suitability form will be completed for all households whom move into temporary or private accommodation.</p>	None at this point. Will be reviewed as appropriate.

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>As identified within the previous EIA, a greater proportion of homeless decisions are made for ethnic minorities and therefore the policies will have a disproportionate effect on ethnic minority households. (Government impact assessment, 12 January 2011).</p> <p>Based on the Southwark Demography report 2015, Southwark is ethnically diverse with 48% of its population being black and minority ethnic. This is reflective in the snapshot of residents in temporary accommodation with exactly the same figure.</p> <p>There may also be fewer cultural facilities for some ethnic groups in locations outside London, although this would very much depend on the area where the offer was made.</p> <p>Poor quality information or language problems could impact negatively.</p> <p>English not first language – if households are allocated a private rented home they will need to receive adequate guidance to explain the rent</p>	None identified.

11 January 2021

<p>charged and the ability to pay.</p> <p>Members of gypsy and travelling communities may be reluctant to approach the Council for help due to suspicion of official organisations. In addition to this, a lack of understanding of homelessness in gypsy and traveller communities means that this group may not be adequately planned for.</p> <p>Larger properties with three, four, five or six bedrooms are often a requirement of some racial groups and lack of availability could disadvantage some families. The additional stock anticipated from procurement work further afield will be able to meet the needs of larger families.</p> <p>In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of race.</p> <p>It is anticipated the Good Homes standard will have a positive impact upon households across all races as they will be able to benefit from a better standard of home.</p>	
Equality information on which above analysis is based	Health data on which above analysis is based
<p>Southwark Demography 2015 report: 52% of the population belong to the White group, 48% to Black, Asian and Minority Ethnic group.</p> <p>31% Black ethnicity compared to 17% in London. 16% African ethnicity compared to 7% in London. 6% Caribbean ethnicity compared to 4% in London. 9% Black Other compared to 5% in London 11% Asian ethnicity compared to 21% in London.</p> <p>Of the 515 where ethnicity was recorded, we can calculate that 22% of the decisions were for white British/Irish/other ethnicity. In conclusion we can see that a great proportion (78%) of the homeless decisions are made for ethnic minorities and therefore the policies will have a disproportionate effect on ethnic minority households.</p> <ul style="list-style-type: none"> ▪ https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/Housing-Briefing-23.pdf ▪ https://data.london.gov.uk/census/reports/ ▪ https://www.npi.org.uk/files/6614/7316/1332/Demography_and_deprivation_in_Southwark_and_Tower_Hamlets.pdf ▪ BME National. 2017. BME Housing Sector Offer. https://bmenational.files.wordpress.com/2017/06/the-bme-housing-sector-offer.pdf <p>BME National and Human City Institute (HCI). 2015. Summary of research study exploring legacy of BME housing organisations. http://www.housingdiversitynetwork.co.uk/wp-content/uploads/BME-National-and-HCI-Deep-roots-diverse-communities-dedicated-service-summary-Aug-2015.pdf</p> <p>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</p>	<p>No current data available.</p>

11 January 2021

Mitigating actions to be taken	
<p>Places will be identified for procuring properties, where their diversity as far as possible reflects that of Southwark, focussing on more urban areas where there are likely to be more facilities and support networks. This might particularly benefit households of different ethnic origins.</p> <p>Procurement of properties outside London will, wherever possible, be focussed on urban areas in the South East in areas with reasonable transport links to Southwark – in order to help households maintain local connections. This might particularly benefit households of different ethnic origins</p> <p>Discharge into the private sector decisions will be monitored by ethnicity. As applicants move on in the process, progress is monitored through the iWorld Northgate housing system which enables a series of reports that monitor by relevant equality characteristics.</p> <p>All literature, forms and other information is readily available in the languages most commonly used. The Service ensures that people from whatever ethnicity can compete on an equal basis; this includes Gypsy and traveller communities. Translation services are made widely available.</p> <p>Southwark has committed in the Homelessness Strategy 2018-22 Action Plan (Action 1.6) to exploring factors behind BME households being over-represented as accepted homeless cases. With a better understanding it could be possible to improve prevention of homelessness in the first place.</p> <p>The overall aim of this policy is to prevent homelessness and reduce the necessity for people to remain in inappropriate temporary accommodation. The delivery of the actions identified will have positive impact for BME, disabled and vulnerable, young people and women, all of whom are over represented amongst those who are at risk of homelessness.</p>	None at this point. Will be reviewed as appropriate.

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>Homeless applicants may, for example, regularly attend a place of worship. If they are allocated a private sector accommodation out of the borough it may make it difficult for them to continue to attend regularly.</p> <p>Whilst the detailed recording of homeless applications and housing allocations by people of different faith groups can pin point adverse</p>	None identified.

11 January 2021

<p>trends in relation to individual faith groups, the information should be treated only as an issue for further investigation since much will depend on the respective priorities of applicants and the particular areas they are aspiring to. Therefore, close monitoring in this area is essential to identify any patterns that may arise.</p> <p>Please note that religion or belief alone would not have any bearing on the ability to access services. However this could impact on a household decision to move away for the existing community.</p> <p>There is no evidence of inequality taking place as a result of amended policy.</p> <p>It is anticipated the Good Homes standard will have a positive impact upon households across all faiths as they will be able to benefit from a better standard of property.</p>	
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</p>	<p>No data sets record religion or belief.</p>
<p>Mitigating actions to be taken</p>	
<p>Places will be identified where their diversity as far as possible reflects that of Southwark, focussing on more urban areas where there are likely to be more facilities and support networks for people. This might particularly benefit people with different faiths and beliefs.</p> <p>Procurement of properties outside London will, wherever possible, be focussed on urban areas in the South East in areas with reasonable transport links to Southwark – in order to help households maintain local connections. This might particularly benefit people with different faiths and beliefs.</p> <p>During the homelessness application, information is collected which ensures that a suitable offer of accommodation can be made in the private rented sector. Religious beliefs can be taken into account by reviewing the suitability of accommodation and its proximity to relevant places of worship.</p> <p>The resettlement services will be able to assist households to new places of worship where they move away from the existing area.</p>	<p>None at this point. Will be reviewed as appropriate.</p>

Sex - A man or a woman.

Potential impacts (positive and negative) of proposed policy/decision/business plan

Potential health impacts (positive and negative)

11 January 2021

<p>As identified within the previous EIA, women are disproportionately represented among lead applicants from accepted households.</p> <p>Women are also more likely to be lone parents, who are disproportionately affected by homelessness in Southwark.</p> <p>Women are also more likely to be carers, who can be impacted by moves away from the people they are caring for, they are also more likely to be impacted if they move outside Southwark and London and have to travel greater distances to maintain that care.</p> <p>People with children, and lone parents (who are more likely to be women) in particular, will potentially be negatively affected if they move outside Southwark and London as they are more likely to rely on local support networks for child care arrangements.</p> <p>Households with children with special educational needs, where Family Services are working with them and where children are at key exam stages could be particularly affected.</p> <p>Women of a working age are less likely than men of a working age to be in employment.</p> <p>Women are 8 times more likely to be a victim of domestic abuse. Therefore, obtaining accommodation further afield will enable greater choice to women whom require permanent and temporary accommodation.</p> <p>In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of sex.</p> <p>Women are 8 times more likely to be victims of domestic abuse. Therefore they may require specific suitable temporary accommodation. The increase in the geographical area will enable the provision of more temporary accommodation available for this client group.</p>	None identified.
Equality information on which above analysis is based	Health data on which above analysis is based
<p>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</p> <p>Therefore, although Southwark is evenly split between male and females (Southwark Demography 2015), a higher proportion of the decisions are made for females.</p> <p>Evidence on gender and employment rates: http://www.poverty.org.uk/48/index.shtml</p> <p>According to Gingerbread, around 90% of single parents are women carers UK estimates that 58% of carers are women</p>	No data available currently.
Mitigating actions to be taken	
<p>Some carers (who are more likely to be women) will be prioritised for in borough/adjacent borough accommodation.</p>	None at this point. Will be reviewed as appropriate.

11 January 2021

<p>Resettlement support will be offered for private rented offers which are out of London, and for moves within London where they are needed and this could include help to register children in local schools.</p> <p>Support will also be offered to households moving into temporary accommodation outside London and as above this could include help to enrol children in local schools and to find nursery places.</p> <p>Provision of temporary accommodation for victims of domestic abuse. Ensure suitability assessments are completed to ensure victims of domestic abuse are removed from area's of risk.</p>	
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Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>As identified within the previous EIA, it is acknowledged that data on resident's sexual orientation has the potential to be inaccurate and on-going efforts should be made to encourage such information being given at the point of application.</p> <p>While many people identify as heterosexual, many people also do not in the wider community. The Government estimates that approximately 6% of the population are gay men, lesbians or bisexuals.</p> <p>Members of the LGBT community may face specific barriers not currently considered, and it may be that more information about this client group is needed.</p> <p>Insufficient monitoring customer engagement and feedback means that it is not be possible at this time to properly evaluate with any certainty what impact the service has and whether some customers may be disadvantaged through their sexual orientation. There is a risk albeit small, that anyone in this position could be discriminated against and this could lead to an inequality in treatment.</p> <p>A survey published in 2000, National Survey of Sexual Attitudes and Lifestyles, concluded that 5-7% of the UK population were likely to be lesbian, gay and bisexual. There is no evidence to suggest that people in these categories are likely to be disproportionately represented among those presenting themselves as homeless.</p> <p>Homeless household sexual orientation information is not available but moves outside London may impact on the support networks and services available to Lesbian, Bisexual, Gay and Transgender (LGBT) groups, although there is no actual evidence of this, and it would very much depend on the location of any properties offered.</p> <p>ONS data (2015) indicates that areas outside London have a smaller LGBT population. The proportion of the LGBT population in London is estimated to be 2.6% compared to 1.8% in the South East and</p>	<p>None identified.</p>

11 January 2021

<p>1.2% in the East of England³. There may be impacts arising from the relative lack of support and other services designed specifically for LGBT people in some places outside London, but again this would very much depend on the area where the offer was made.</p> <p>In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of sexual orientation.</p> <p>It is anticipated the Good Homes standard will have a positive impact upon households across all groups as they will be able to benefit from a better standard of property.</p>	
Equality information on which above analysis is based	Health data on which above analysis is based
<p>National Survey of Sexual Attitudes and Lifestyles (2000)</p> <p>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</p>	<p>No data sets record sexual orientation.</p>
Mitigating actions to be taken	
<p>The focus on procuring properties in more urban areas, where their diversity as far as possible reflects that of Southwark, might help to ensure there are facilities for people of different sexual orientations, which might be more likely where the population is more diverse. In addition the focus on also procuring properties in areas with reasonable transport links to London might help people of different sexual orientations to continue to use support services, if there are fewer where they live</p> <p>The housing Solutions service responsible for the administration of the policies, have partnered with Stonewall housing. This will help to continually examine the practices of the policy ensuring residents from the LGBTQ community are represented. Ensuring there is access to households from this group to access the service</p> <p>Stonewall will focus on advice and advocacy including viewings, applying for benefits, referring to other agencies for assistance. In addition to the above, Stonewall will focus upon wider community and outreach work.</p> <p>It is acknowledged there is an over representation of homeless approaches from the LGBTQ community and greater work must be completed to prevent homelessness.</p> <p>The Housing solutions services will employ resettlement officers to provide a customer care to all households placed out of the borough to ensure households have someone to contact regarding any issues.</p> <p>Monitoring of this sector will enable specific issues for different segments of the population to be identified and addressed</p>	<p>None at this point. Will be reviewed as appropriate.</p>

³<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2015>

11 January 2021

appropriately.	
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Human Rights

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol.

Potential impacts (positive and negative) of proposed policy/decision/business plan

There are no anticipated negative impacts on Human Rights as a result of these policies.

Information on which above analysis is based

No current data available.

Mitigating actions to be taken

None at this point. Will be reviewed as appropriate.

11 January 2021

Section 5: Further actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating actions or the areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	Monitor the impact of implementing the policies. Still very little information available on the performance of the policies implemented in 2019. The services has amended the Homeless application and the suitability assessments on several occasions therefore further time is required.	Ensure regular scheduled reviews and analysis of data is recorded.	These impacts will be reported on an annual basis from the date of implementation.
2	Develop improved understanding of why some BME communities are disproportionately represented within homelessness services together with the development of appropriate early intervention and prevention measures to address this over representation.	Improve our customer insight through focus group involvement and improved data collection. Develop appropriate early intervention and prevention measures to address this over representation.	Focus groups held beginning in early 2018 and new prevention measures assessed and implemented by March 2019. Monitor national and local data and reports on this and consider good practice recommendations.
3	Affects of the National Covid 19 pandemic on BAME.	Close monitoring and work with public health.	Regular monitoring.
4	Changing housing market may make some area's over populated with a specific client group.	Monitoring of where households are being placed.	12 month review
5	Ensuring households with mental health issues are able to successfully sustain a private tenancy.	Resettlement service to ensure 12 month tenancy review are completed.	Ongoing

5. Equality objectives (for business plans)			
Based on the initial analysis above, please detail any equality objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.			
Objective and measure	Lead officer	Current performance (baseline)	Targets
			Year 1 Year 2

11 January 2021

None at this point	None at this point	None at this point	None at this point	None at this point
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5. Health objectives (for business plans)

Based on the initial analysis above, please detail any health objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.

Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
None at this point	None at this point	None at this point	None at this point	None at this point

VOA - Private rental market summary statistics

October 2019 to September 2020

£1,284.18 per month

Benefit cap in London for single person without children or not living with your children

£1,116.66 per month

Benefit cap outside London for single person without children or not living with your children:

Shared room										
Area	LHA cap - April 2020 (pcm)	Predominant BRMA	Counts of rents	Lower quartile private monthly rent	between LHA and lower quartile private	Location banding	Lower quartile private	From	Journey time (mins) and daily peak return cost	Frequency
Southwark	515	Inner South East London	30	600	-85	1 - in borough of Southwark	684.18	n/a	n/a	n/a
Lewisham	515	Inner South East London	130	625	-110	2 - neighbouring borough	659.18	Peckham Rye	13 - £4.20	Every 30 mins
Bromley	448	Outer South East London	10	495	-47	2 - neighbouring borough	789.18	Peckham Rye	47 - £5.80	Every 30 mins
Lambeth	515	Inner South East London	10	613	-98	2 - neighbouring borough	671.18	Peckham Rye	37 - £3.00	Every 15 mins
Greenwich	448	Outer South East London	20	625	-177	3 - other London borough	659.18	London Bridge	25 - £4.80	Every 5 mins
Croydon	448	Outer South London	100	525	-77	3 - other London borough	759.18	London Bridge	20 - £7.20	Every 10 mins
Bexley	448	Outer South East London	20	433	15	3 - other London borough	851.18	London Bridge	48 - £8.40	Every 30 mins
Newham	490	Outer East London	50	520	-30	3 - other London borough	764.18	London Bridge	33 - £7.80	Every 5 mins
Tower Hamlets	591	Inner East London	50	650	-59	3 - other London borough	634.18	London Bridge	25 - £4.80	Every 5 mins
Wandsworth	506	Inner South West London	0	N/A	N/A	3 - other London borough	N/A	London Bridge	42 - £5.20	Every 5 mins
Westminster	668	Central London	10	843	-175	3 - other London borough	441.18	London Bridge	8 - 4.80	Every 5 mins
RBKC	668	Central London	0	N/A	N/A	3 - other London borough	N/A	London Bridge	31 - £4.80	Every 5 mins
Dagenham	440	Outer North East London	20	550	-110	3 - other London borough	566.66	London Bridge	37 - £6.20	Every 5 mins
Feltham/Hounslow	498	Outer West London	40	595	-97	3 - other London borough	521.66	London Bridge	41 - £8.40	Every 10 mins
Dartford	385	North West Kent	0	N/A	N/A	4 - Selected South East	N/A	Peckham Rye	47 - £7.00	Every 15 mins
Gravesend	385	North West Kent	10	450	-65	4 - Selected South East	666.66	London Bridge	46 - £19.60	Every 10 mins
Stevenage	340	Stevenage & North Herts	90	370	-30	4 - Selected South East	746.66	London Bridge	42 - £23.20	Every 30 mins
Harlow	331	Harlow & Stortford	0	N/A	N/A	4 - Selected South East	N/A	London Bridge	65 - £19.90	Every 30 mins
Grays/Thurrock	332	South West Essex	0	N/A	N/A	4 - Selected South East	N/A	London Bridge	60 - £22.60	Every 30 mins
Medway	315	Medway and Swale	170	350	-35	4 - Selected South East	766.66	Nunhead	57 - £19.40	Every 30 mins
Slough	448	East Thames Valley	10	550	-102	4 - Selected South East	566.66	London Bridge	60 - £21.40	Every 30 mins
M Maidenhead	448	East Thames Valley	20	463	-15	4 - Selected South East	653.66	London Bridge	79 - £24.50	Every 10 mins
Basildon	332	South West Essex	20	350	-18	4 - Selected South East	766.66	London Bridge	56 - £25.10	Every 15 mins
Luton	340	Luton	70	375	-35	4 - Selected South East	741.66	London Bridge	50 - £30.70	Every 15 mins
Crawley	440	Crawley & Reigate	90	450	-10	4 - Selected South East	666.66	London Bridge	46 - £30.30	Every 30 mins
Coventry	335	Coventry	100	368	-33	5 - Selected locations 60–120 mins from Southwark	748.66	London Bridge	100 - £62.50	Every 20 mins
Northampton	387	Northampton	120	433	-46	5 - Selected locations 60–120 mins from Southwark	683.66	London Bridge	94 - £54.00	Every 30 mins
Peterborough	284	Peterborough	780	340	-56	5 - Selected locations 60–120 mins from Southwark	776.66	London Bridge	93 - £43.40	Every 20 mins
Bedford	344	Bedford	0	N/A	N/A	5 - Selected locations 60–120 mins from Southwark	N/A	London Bridge	70 - £44.80	Every 30 mins
Leicester	338	Leicester	170	325	13	5 - Selected locations 60–120 mins from Southwark	791.66	London Bridge	95 - £85.00	Every 30 mins
Birmingham	290	Birmingham	50	325	-35	5 - Selected locations 60–120 mins from Southwark	791.66	London Bridge	122 - £37.50	Every 20 mins

VOA - Private rental market summary statistics

October 2019 to September 2020

£1,284.18 per month

Benefit cap in London for single person without children or not living with your children

£1,116.66 per month

Benefit cap outside London for single person without children or not living with your children:

Studios											
Area	LHA cap - April 2020 (pcm)	Predominant BRMA	Counts of rents	quartile private monthly rent	between LHA and lower quartile private	Location banding	Lower quartile private monthly rent	From	Journey time (mins) daily return cost	time and peak	Frequency
Southwark	£1,146	Inner South East London	40	£1,000	£146	1 - in borough of Southwark	284.18	n/a	n/a		n/a
Lewisham	£1,146	Inner South East London	90	£800	£346	2 - neighbouring borough	484.18	Peckham Rye	13 - £4.20		Every 30 mins
Bromley	£892	Outer South East London	40	£745	£147	2 - neighbouring borough	539.18	Peckham Rye	47 - £5.80		Every 30 mins
Lambeth	£1,146	Inner South East London	40	£950	£196	2 - neighbouring borough	334.18	Peckham Rye	37 - £3.00		Every 15 mins
Greenwich	£892	Outer South East London	30	£750	£142	3 - other London borough	534.18	London Bridge	25 - £4.80		Every 5 mins
Croydon	£872	Outer South London	90	£700	£172	3 - other London borough	584.18	London Bridge	20 - £7.20		Every 10 mins
Bexley	£892	Outer South East London	30	£650	£242	3 - other London borough	634.18	London Bridge	48 - £8.40		Every 30 mins
Newham	£1,047	Outer East London	60	£1,100	-£53	3 - other London borough	184.18	London Bridge	33 - £7.80		Every 5 mins
Tower Hamlets	£1,280	Inner East London	110	£1,281	-£1	3 - other London borough	3.18	London Bridge	25 - £4.80		Every 5 mins
Wandsworth	£1,280	Inner South West London	40	£974	£306	3 - other London borough	310.18	London Bridge	42 - £5.20		Every 5 mins
Westminster	£1,280	Central London	130	£1,213	£67	3 - other London borough	71.18	London Bridge	8 - 4.80		Every 5 mins
RBKC	£1,280	Central London	150	£1,278	£2	3 - other London borough	6.18	London Bridge	31 - £4.80		Every 5 mins
Dagenham	£897	Outer North East London	10	£650	£247	3 - other London borough	466.66	London Bridge	37 - £6.20		Every 5 mins
Feltham/Hounslow	£922	Outer West London	90	£750	£172	3 - other London borough	366.66	London Bridge	41 - £8.40		Every 10 mins
Dartford	£673	North West Kent	40	£575	£98	4 - Selected South East	541.66	Peckham Rye	47 - £7.00		Every 15 mins
Gravesend	£673	North West Kent	40	£525	£148	4 - Selected South East	591.66	London Bridge	46 - £19.60		Every 10 mins
Stevenage	£673	Stevenage & North Herts	20	£575	£98	4 - Selected South East	541.66	London Bridge	42 - £23.20		Every 30 mins
Harlow	£718	Harlow & Stortford	10	£625	£93	4 - Selected South East	491.66	London Bridge	65 - £19.90		Every 30 mins
Grays/Thurrock	£698	South West Essex	40	£605	£93	4 - Selected South East	511.66	London Bridge	60 - £22.60		Every 30 mins
Medway	£593	Medway and Swale	90	£495	£98	4 - Selected South East	621.66	Nunhead	57 - £19.40		Every 30 mins
Slough	£797	East Thames Valley	20	£625	£172	4 - Selected South East	491.66	London Bridge	60 - £21.40		Every 30 mins
Maidenhead	£797	East Thames Valley	20	£700	£97	4 - Selected South East	416.66	London Bridge	79 - £24.50		Every 10 mins
Basildon	£698	South West Essex	20	£550	£148	4 - Selected South East	566.66	London Bridge	56 - £25.10		Every 15 mins
Luton	£575	Luton	100	£458	£117	4 - Selected South East	658.66	London Bridge	50 - £30.70		Every 15 mins
Crawley	£747	Crawley & Reigate	40	£650	£97	4 - Selected South East	466.66	London Bridge	46 - £30.30		Every 30 mins
Coventry	£488	Coventry	90	£410	£78	5 - Selected locations 60–120 mins from Southwark	706.66	London Bridge	100 - £62.50		Every 20 mins
Northampton	£548	Northampton	10	£425	£123	5 - Selected locations 60–120 mins from Southwark	691.66	London Bridge	94 - £54.00		Every 30 mins
Peterborough	£478	Peterborough	130	£455	£23	5 - Selected locations 60–120 mins from Southwark	661.66	London Bridge	93 - £43.40		Every 20 mins
Bedford	£573	Bedford	20	£470	£103	5 - Selected locations 60–120 mins from Southwark	646.66	London Bridge	70 - £44.80		Every 30 mins
Leicester	£448	Leicester	130	£350	£98	5 - Selected locations 60–120 mins from Southwark	766.66	London Bridge	95 - £85.00		Every 30 mins
Birmingham	£523	Birmingham	160	£450	£73	5 - Selected locations 60–120 mins from Southwark	666.66	London Bridge	122 - £37.50		Every 20 mins

VOA - Private rental market summary statistics

October 2019 to September 2020

£1,284.18 per month Benefit cap in London for single person without children or not living with your children
 £1,116.66 per month Benefit cap outside London for single person without children or not living with your children.
 1916.68 per month Benefit cap in London for couples (with or without children) or a single parent.
 1666.69 per month Benefit cap outside London for couples (with or without children) or a single parent.

1 bedroom											
Area	LHA cap - April 2020 (pcm)	Predominant BRMA	Counts of rents	quartile private monthly	between LHA and lower quartile	Location banding	- Lower quartile private	Lower quartile private monthly rent	From	Journey time (mins) daily and peak return cost	Frequency
Southwark	£1,146	Inner South East London	390	1225	-79	1 - in borough of Southwark	59.18	691.68	n/a	n/a	n/a
Lewisham	£1,146	Inner South East London	560	1000	146	2 - neighbouring borough	284.18	916.68	Peckham Rye	13 - £4.20	Every 30 mins
Bromley	£892	Outer South East London	480	900	-8	2 - neighbouring borough	384.18	1016.68	Peckham Rye	47 - £5.80	Every 30 mins
Lambeth	£1,146	Inner South East London	370	1350	-204	2 - neighbouring borough	-65.82	566.68	Peckham Rye	37 - £3.00	Every 15 mins
Greenwich	£892	Outer South East London	330	1100	-208	3 - other London borough	184.18	816.68	London Bridge	25 - £4.80	Every 5 mins
Croydon	£872	Outer South London	570	875	-3	3 - other London borough	409.18	1041.68	London Bridge	20 - £7.20	Every 10 mins
Bexley	£892	Outer South East London	190	775	117	3 - other London borough	509.18	1141.68	London Bridge	48 - £8.40	Every 30 mins
Newham	£1,047	Outer East London	400	1100	-53	3 - other London borough	184.18	816.68	London Bridge	33 - £7.80	Every 5 mins
Tower Hamlets	£1,280	Inner East London	520	1350	-70	3 - other London borough	-65.82	566.68	London Bridge	25 - £4.80	Every 5 mins
Wandsworth	£1,280	Inner South West London	410	1300	-20	3 - other London borough	-15.82	616.68	London Bridge	42 - £5.20	Every 5 mins
Westminster	£1,280	Central London	460	1668	-388	3 - other London borough	-383.82	248.68	London Bridge	8 - 4.80	Every 5 mins
RBKC	£1,280	Central London	570	1712	-432	3 - other London borough	-427.82	204.68	London Bridge	31 - £4.80	Every 5 mins
Dagenham	£897	Outer North East London	170	900	-3	3 - other London borough	216.66	766.69	London Bridge	37 - £6.20	Every 5 mins
Feltham/Hounslow	£922	Outer West London	390	1000	-78	3 - other London borough	116.66	666.69	London Bridge	41 - £8.40	Every 10 mins
Dartford	£673	North West Kent	200	725	-52	4 - Selected South East	391.66	941.69	Peckham Rye	47 - £7.00	Every 15 mins
Gravesend	£673	North West Kent	250	725	-52	4 - Selected South East	391.66	941.69	London Bridge	46 - £19.60	Every 10 mins
Stevenage	£673	Stevenage & North Herts	100	695	-22	4 - Selected South East	421.66	971.69	London Bridge	42 - £23.20	Every 30 mins
Harlow	£718	Harlow & Stortford	90	713	5	4 - Selected South East	403.66	953.69	London Bridge	65 - £19.90	Every 30 mins
Grays/Thurrock	£698	South West Essex	300	725	-27	4 - Selected South East	391.66	941.69	London Bridge	60 - £22.60	Every 30 mins
Medway	£593	Medway and Swale	650	595	-2	4 - Selected South East	521.66	1071.69	Nunhead	57 - £19.40	Every 30 mins
Slough	£797	East Thames Valley	220	788	9	4 - Selected South East	328.66	878.69	London Bridge	60 - £21.40	Every 30 mins
Maidenhead	£797	East Thames Valley	280	850	-53	4 - Selected South East	266.66	816.69	London Bridge	79 - £24.50	Every 10 mins
Basildon	£698	South West Essex	370	675	23	4 - Selected South East	441.66	991.69	London Bridge	56 - £25.10	Every 15 mins
Luton	£575	Luton	480	625	-50	4 - Selected South East	491.66	1041.69	London Bridge	50 - £30.70	Every 15 mins
Crawley	£747	Crawley & Reigate	290	800	-53	4 - Selected South East	316.66	866.69	London Bridge	46 - £30.30	Every 30 mins
Coventry	£488	Coventry	270	505	-17	5 - Selected locations 60–120 mins from Southwark	611.66	1161.69	London Bridge	100 - £62.50	Every 20 mins
Northampton	£548	Northampton	250	563	-15	5 - Selected locations 60–120 mins from Southwark	553.66	1103.69	London Bridge	94 - £54.00	Every 30 mins
Peterborough	£478	Peterborough	670	500	-22	5 - Selected locations 60–120 mins from Southwark	616.66	1166.69	London Bridge	93 - £43.40	Every 20 mins
Bedford	£573	Bedford	180	550	23	5 - Selected locations 60–120 mins from Southwark	566.66	1116.69	London Bridge	70 - £44.80	Every 30 mins
Leicester	£448	Leicester	550	475	-27	5 - Selected locations 60–120 mins from Southwark	641.66	1191.69	London Bridge	95 - £85.00	Every 30 mins
Birmingham	£523	Birmingham	1450	550	-27	5 - Selected locations 60–120 mins from Southwark	566.66	1116.69	London Bridge	122 - £37.50	Every 20 mins

VOA - Private rental market summary statistics

October 2019 to September 2020

1916.68 per month

Benefit cap in London for couples (with or without children) or a single parent.

1666.69 per month

Benefit cap outside London for couples (with or without children) or a single parent.

2 bedroom										
Area	LHA cap - April 2020 (pcm)	Predominant BRMA	Counts of rents	Lower quartile private monthly rent	between LHA and lower quartile private rent	Location banding	Lower quartile private monthly rent	From	Journey time (mins) and daily peak return cost	Frequency
Southwark	1346	Inner South East London	470	1500	-154	1 - in borough of Southwark	416.68	n/a	n/a	n/a
Lewisham	1346	Inner South East London	710	1250	96	2 - neighbouring borough	666.68	Peckham Rye	13 - £4.20	Every 30 mins
Bromley	1096	Outer South East London	740	1150	-54	2 - neighbouring borough	766.68	Peckham Rye	47 - £5.80	Every 30 mins
Lambeth	1346	Inner South East London	610	1500	-154	2 - neighbouring borough	416.68	Peckham Rye	37 - £3.00	Every 15 mins
Greenwich	1096	Outer South East London	540	1250	-154	3 - other London borough	666.68	London Bridge	25 - £4.80	Every 5 mins
Croydon	£1,096	Outer South London	700	1100	-4	3 - other London borough	816.68	London Bridge	20 - £7.20	Every 10 mins
Bexley	1096	Outer South East London	330	995	101	3 - other London borough	921.68	London Bridge	48 - £8.40	Every 30 mins
Newham	1296	Outer East London	600	1339	-43	3 - other London borough	577.68	London Bridge	33 - £7.80	Every 5 mins
Tower Hamlets	1585	Inner East London	590	1625	-40	3 - other London borough	291.68	London Bridge	25 - £4.80	Every 5 mins
Wandsworth	1545	Inner South West London	710	1550	-5	3 - other London borough	366.68	London Bridge	42 - £5.20	Every 5 mins
Westminster	1585	Central London	500	2210	-625	3 - other London borough	-293.32	London Bridge	8 - 4.80	Every 5 mins
RBKC	1585	Central London	670	2275	-690	3 - other London borough	-358.32	London Bridge	31 - £4.80	Every 5 mins
Dagenham	1146	Outer North East London	280	1125	21	3 - other London borough	541.69	London Bridge	37 - £6.20	Every 5 mins
Feltham/Hounslow	1171	Outer West London	520	1200	-29	3 - other London borough	466.69	London Bridge	41 - £8.40	Every 10 mins
Dartford	847	North West Kent	380	875	-28	4 - Selected South East	791.69	Peckham Rye	47 - £7.00	Every 15 mins
Gravesend	847	North West Kent	370	800	47	4 - Selected South East	866.69	London Bridge	46 - £19.60	Every 10 mins
Stevenage	847	Stevenage & North Herts	180	888	-41	4 - Selected South East	778.69	London Bridge	42 - £23.20	Every 30 mins
Harlow	897	Harlow & Stortford	160	900	-3	4 - Selected South East	766.69	London Bridge	65 - £19.90	Every 30 mins
Grays/Thurrock	872	South West Essex	580	858	14	4 - Selected South East	808.69	London Bridge	60 - £22.60	Every 30 mins
Medway	747	Medway and Swale	1060	750	-3	4 - Selected South East	916.69	Nunhead	57 - £19.40	Every 30 mins
Slough	920	East Thames Valley	210	950	-30	4 - Selected South East	716.69	London Bridge	60 - £21.40	Every 30 mins
M Maidenhead	920	East Thames Valley	680	1050	-130	4 - Selected South East	616.69	London Bridge	79 - £24.50	Every 10 mins
Basildon	872	South West Essex	530	875	-3	4 - Selected South East	791.69	London Bridge	56 - £25.10	Every 15 mins
Luton	772	Luton	470	750	22	4 - Selected South East	916.69	London Bridge	50 - £30.70	Every 15 mins
Crawley	947	Crawley & Reigate	430	975	-28	4 - Selected South East	691.69	London Bridge	46 - £30.30	Every 30 mins
Coventry	573	Coventry	940	625	-52	5 - Selected locations 60–120 mins from Southwark	1041.69	London Bridge	100 - £62.50	Every 20 mins
Northampton	693	Northampton	560	680	13	5 - Selected locations 60–120 mins from Southwark	986.69	London Bridge	94 - £54.00	Every 30 mins
Peterborough	593	Peterborough	1590	625	-32	5 - Selected locations 60–120 mins from Southwark	1041.69	London Bridge	93 - £43.40	Every 20 mins
Bedford	723	Bedford	320	700	23	5 - Selected locations 60–120 mins from Southwark	966.69	London Bridge	70 - £44.80	Every 30 mins
Leicester	563	Leicester	950	560	3	5 - Selected locations 60–120 mins from Southwark	1106.69	London Bridge	95 - £85.00	Every 30 mins
Birmingham	623	Birmingham	2250	650	-27	5 - Selected locations 60–120 mins from Southwark	1016.69	London Bridge	122 - £37.50	Every 20 mins

VOA - Private rental market summary statistics

October 2019 to September 2020

1916.68 per month

Benefit cap in London for couples (with or without children) or a single parent.

1666.69 per month

Benefit cap outside London for couples (with or without children) or a single parent.

3 bedroom										
Area	LHA cap - April 2020 (pcm)	Predominant BRMA	Counts of rents	Lower quartile private monthly rent	Shortfall between LHA and lower quartile	Location banding	Benefit cap - Lower quartile private monthly rent	From	Journey time (mins) and daily peak return cost	Frequency
Southwark	1670	Inner South East London	160	1850	-180	1 - in borough of Southwark	66.68	n/a	n/a	n/a
Lewisham	1670	Inner South East London	270	1500	170	2 - neighbouring borough	416.68	Peckham Rye	13 - £4.20	Every 30 mins
Bromley	1296	Outer South East London	290	1400	-104	2 - neighbouring borough	516.68	Peckham Rye	47 - £5.80	Every 30 mins
Lambeth	1670	Inner South East London	210	2000	-330	2 - neighbouring borough	-83.32	Peckham Rye	37 - £3.00	Every 15 mins
Greenwich	1296	Outer South East London	250	1450	-154	3 - other London borough	466.68	London Bridge	25 - £4.80	Every 5 mins
Croydon	1371	Outer South London	260	1325	46	3 - other London borough	591.68	London Bridge	20 - £7.20	Every 10 mins
Bexley	1296	Outer South East London	200	1150	146	3 - other London borough	766.68	London Bridge	48 - £8.40	Every 30 mins
Newham	1545	Outer East London	300	1558	-13	3 - other London borough	358.68	London Bridge	33 - £7.80	Every 5 mins
Tower Hamlets	1914	Inner East London	210	2000	-86	3 - other London borough	-83.32	London Bridge	25 - £4.80	Every 5 mins
Wandsworth	1914	Inner South West London	290	1865	49	3 - other London borough	51.68	London Bridge	42 - £5.20	Every 5 mins
Westminster	1914	Central London	170	3033	-1119	3 - other London borough	-1116.32	London Bridge	8 - 4.80	Every 5 mins
RBKC	1914	Central London	190	3543	-1629	3 - other London borough	-1626.32	London Bridge	31 - £4.80	Every 5 mins
Dagenham	1265	Outer North East London	170	1350	-85	3 - other London borough	316.69	London Bridge	37 - £6.20	Every 5 mins
Enfield/Hounslow	1396	Outer West London	250	1460	-64	3 - other London borough	206.69	London Bridge	41 - £8.40	Every 10 mins
Dartford	1047	North West Kent	180	1100	-53	4 - Selected South East	566.69	Peckham Rye	47 - £7.00	Every 15 mins
Gravesend	1047	North West Kent	260	975	72	4 - Selected South East	691.69	London Bridge	46 - £19.60	Every 10 mins
Stevenage	1047	Stevenage & North Herts	100	1050	-3	4 - Selected South East	616.69	London Bridge	42 - £23.20	Every 30 mins
Harlow	1121	Harlow & Stortford	90	1150	-29	4 - Selected South East	516.69	London Bridge	65 - £19.90	Every 30 mins
Grays/Thurrock	1072	South West Essex	330	1100	-28	4 - Selected South East	566.69	London Bridge	60 - £22.60	Every 30 mins
Medway	847	Medway and Swale	780	850	-3	4 - Selected South East	816.69	Nunhead	57 - £19.40	Every 30 mins
Slough	1271	East Thames Valley	80	1250	21	4 - Selected South East	416.69	London Bridge	60 - £21.40	Every 30 mins
Maidenhead	1271	East Thames Valley	300	1300	-29	4 - Selected South East	366.69	London Bridge	79 - £24.50	Every 10 mins
Basildon	1072	South West Essex	380	1050	22	4 - Selected South East	616.69	London Bridge	56 - £25.10	Every 15 mins
Luton	972	Luton	320	950	22	4 - Selected South East	716.69	London Bridge	50 - £30.70	Every 15 mins
Crawley	1196	Crawley & Reigate	240	1175	21	4 - Selected South East	491.69	London Bridge	46 - £30.30	Every 30 mins
Coventry	673	Coventry	660	695	-22	5 - Selected locations 60–120 mins from Southwark	971.69	London Bridge	100 - £62.50	Every 20 mins
Northampton	797	Northampton	300	780	17	5 - Selected locations 60–120 mins from Southwark	766.69	London Bridge	94 - £54.00	Every 30 mins
Peterborough	693	Peterborough	1220	700	-7	5 - Selected locations 60–120 mins from Southwark	966.69	London Bridge	93 - £43.40	Every 20 mins
Bedford	872	Bedford	240	850	22	5 - Selected locations 60–120 mins from Southwark	816.69	London Bridge	70 - £44.80	Every 30 mins
Leicester	673	Leicester	460	625	48	5 - Selected locations 60–120 mins from Southwark	1041.69	London Bridge	95 - £85.00	Every 30 mins
Birmingham	673	Birmingham	1500	695	-22	5 - Selected locations 60–120 mins from Southwark	971.69	London Bridge	122 - £37.50	Every 20 mins

VOA - Private rental market summary statistics

October 2019 to September 2020

1916.68 per month Benefit cap in London for couples (with or without children) or a single parent.
1666.69 per month Benefit cap outside London for couples (with or without children) or a single parent.

4 bedroom										
Area	LHA cap - April 2020 (pcm)	Predominant BRMA	Counts of rents	Lower quartile private monthly rent	Shortfall between LHA and lower quartile private	Location banding	Benefit cap - Lower quartile private monthly rent	From	Journey time (mins) and daily peak return cost	Frequency
Southwark	2193	Inner South East London	80	2400	-207	1 - in borough of Southwark	-483.32	n/a	n/a	n/a
Lewisham	2193	Inner South East London	80	1900	293	2 - neighbouring borough	16.68	Peckham Rye	13 - £4.20	Every 30 mins
Bromley	1595	Outer South East London	140	1813	-218	2 - neighbouring borough	103.68	Peckham Rye	47 - £5.80	Every 30 mins
Lambeth	2193	Inner South East London	80	2650	-457	2 - neighbouring borough	-733.32	Peckham Rye	37 - £3.00	Every 15 mins
Greenwich	1595	Outer South East London	80	1650	-55	3 - other London borough	266.68	London Bridge	25 - £4.80	Every 5 mins
Croydon	1730	Outer South London	100	1750	-20	3 - other London borough	166.68	London Bridge	20 - £7.20	Every 10 mins
Bexley	1595	Outer South East London	70	1320	275	3 - other London borough	596.68	London Bridge	48 - £8.40	Every 30 mins
Newham	1795	Outer East London	100	1850	-55	3 - other London borough	66.68	London Bridge	33 - £7.80	Every 5 mins
Tower Hamlets	2538	Inner East London	50	2395	143	3 - other London borough	-478.32	London Bridge	25 - £4.80	Every 5 mins
Wandsworth	2572	Inner South West London	210	2500	72	3 - other London borough	-583.32	London Bridge	42 - £5.20	Every 5 mins
Westminster	2572	Central London	50	4088	-1516	3 - other London borough	-2171.32	London Bridge	8 - 4.80	Every 5 mins
RBKC	2572	Central London	80	4983	-2411	3 - other London borough	-3066.32	London Bridge	31 - £4.80	Every 5 mins
Dagenham	1725	Outer North East London	30	1550	175	3 - other London borough	116.69	London Bridge	37 - £6.20	Every 5 mins
Feltham/Hounslow	1645	Outer West London	110	1750	-105	3 - other London borough	-83.31	London Bridge	41 - £8.40	Every 10 mins
Dartford	1296	North West Kent	70	1500	-204	4 - Selected South East	166.69	Peckham Rye	47 - £7.00	Every 15 mins
Gravesend	1296	North West Kent	80	1200	96	4 - Selected South East	466.69	London Bridge	46 - £19.60	Every 10 mins
Stevenage	1296	Stevenage & North Herts	20	1200	96	4 - Selected South East	466.69	London Bridge	42 - £23.20	Every 30 mins
Harlow	1296	Harlow & Stortford	20	1348	-52	4 - Selected South East	318.69	London Bridge	65 - £19.90	Every 30 mins
Grays/Thurrock	1328	South West Essex	80	1400	-72	4 - Selected South East	266.69	London Bridge	60 - £22.60	Every 30 mins
Medway	1196	Medway and Swale	140	1100	96	4 - Selected South East	566.69	Nunhead	57 - £19.40	Every 30 mins
Slough	1595	East Thames Valley	30	1450	145	4 - Selected South East	216.69	London Bridge	60 - £21.40	Every 30 mins
M Maidenhead	1595	East Thames Valley	110	1650	-55	4 - Selected South East	16.69	London Bridge	79 - £24.50	Every 10 mins
Basildon	1328	South West Essex	110	1300	28	4 - Selected South East	366.69	London Bridge	56 - £25.10	Every 15 mins
Luton	1146	Luton	80	1150	-4	4 - Selected South East	516.69	London Bridge	50 - £30.70	Every 15 mins
Crawley	1545	Crawley & Reigate	70	1450	95	4 - Selected South East	216.69	London Bridge	46 - £30.30	Every 30 mins
Coventry	872	Coventry	120	900	-28	5 - Selected locations 60–120 mins from Southwark	1298.69	London Bridge	100 - £62.50	Every 20 mins
Northampton	1017	Northampton	100	1050	-33	5 - Selected locations 60–120 mins from Southwark	616.69	London Bridge	94 - £54.00	Every 30 mins
Peterborough	897	Peterborough	350	875	22	5 - Selected locations 60–120 mins from Southwark	791.69	London Bridge	93 - £43.40	Every 20 mins
Bedford	1146	Bedford	80	1175	-29	5 - Selected locations 60–120 mins from Southwark	491.69	London Bridge	70 - £44.80	Every 30 mins
Leicester	892	Leicester	130	875	17	5 - Selected locations 60–120 mins from Southwark	791.69	London Bridge	95 - £85.00	Every 30 mins
Birmingham	782	Birmingham	240	900	-118	5 - Selected locations 60–120 mins from Southwark	766.69	London Bridge	122 - £37.50	Every 20 mins

TA PAN LONDON RATES

Area	SHARED LHA cap - April 2020 (pcm)	STUDIOS LHA cap - April 2020 (pcm)	1 BED LHA cap - April 2020 (pcm)	2 BED LHA cap - April 2020(pcm)	3 BED LHA cap - April 2020 (pcm)	4 BED LHA cap - April 2020 (pcm)	Shared Lower quartile private monthly rent	Studio Lower quartile private monthly rent	1 bed Lower quartile private monthly rent	2 bed Lower quartile private monthly rent	3 bed Lower quartile private monthly rent	4 bed Lower quartile private monthly rent	pan london rates shared single	Variance between pan london rate and equivalent lower quartile rent	pan london rates studio self contained	Variance between pan london rate and equivalent lower quartile rent2	pan london rates self contained 1 bed	Variance between pan london rate and equivalent lower quartile rent3	pan london rates shared double	Variance between pan london rate and 1 bed lower quartile rent	pan london rates self contained 2 bed	Variance between pan london rate and equivalent lower quartile rent4	pan london rates shared triple	Variance between pan london rate and 2 bed lower quartile rent	pan london rates self contained 3 bed	Variance between pan london rate and equivalent lower quartile rent5	pan london rates shared quad	Variance between pan london rate and 3 bed lower quartile rent	pan london rates self contained 4 bed	Variance between pan london rate and equivalent lower quartile rent6
Southwark	515	£1,146	£1,146	1346	1670	2193	600	£1,000	1225	1500	1850	2400	821	221	1095	£95	1247	22	1065	-160	1627	127	1369	-111	2038	188	1551	-299	2555	155
Lewisham	515	£1,146	£1,146	1346	1670	2193	625	£800	1000	1250	1500	1900	821	196	1095	£295	1247	247	1065	65	1627	377	1369	119	2038	538	1551	51	2555	655
Bromley	448	£892	£892	1096	1296	1595	495	£745	900	1150	1400	1813	821	326	1080	£335	1247	347	1065	165	1627	477	1369	219	2038	638	1551	151	2555	742
Lambeth	515	£1,146	£1,146	1346	1670	2193	613	£950	1350	1500	2000	2650	821	208	1095	£145	1247	-103	1065	-285	1627	127	1369	-111	2038	38	1551	-449	2555	-95
Greenwich	448	£892	£892	1096	1296	1595	625	£750	1100	1250	1450	1650	821	196	1080	£330	1247	147	1065	-35	1627	377	1369	119	2038	588	1551	101	2555	905
Croydon	448	£872	£872	£1,096	1371	1730	525	£700	875	1100	1325	1750	821	296	1065	£365	1247	372	1065	190	1627	527	1369	269	2038	713	1551	226	2442	692
Bexley	448	£892	£892	1096	1296	1595	433	£650	775	995	1150	1320	562	129	1080	£430	1187	412	843	68	1460	465	843	-152	1749	599	843	-307	1825	505
Newham	490	£1,047	£1,047	1296	1545	1795	520	£1,100	1100	1339	1558	1850	562	42	1004	£496	1278	178	852	-248	1673	334	973	-366	1916	358	1095	463	2129	279
Tower Hamlets	591	£1,280	£1,280	1585	1914	2538	650	£1,281	1350	1625	2000	2395	1247	597	1247	£434	1384	34	1308	-42	1658	33	1490	-135	1871	-129	1521	-479	2251	-144
Wandsworth	506	£1,280	£1,280	1545	1914	2572	N/A	£974	1300	1550	1865	2500	927	N/A	1095	£121	1460	160	1106	-194	1795	245	1401	-149	2129	264	1551	-314	2457	-43
Westminster	668	£1,280	£1,280	1585	1914	2572	843	£1,213	1668	2210	3033	4088	N/A	N/A	1369	£156	1430	-238	N/A	N/A	1673	537	N/A	N/A	1977	-1058	N/A	N/A	2281	-1807
RBKC	668	£1,280	£1,280	1585	1914	2572	N/A	£1,278	1712	2275	3543	4983	1080	N/A	1278	£1	1643	-70	1384	-328	2312	37	1506	-768	2312	-1231	1506	-2037	2312	-2671
Dagenham	440	£897	£897	1146	1265	1725	550	£650	900	1125	1350	1550	760	210	867	£217	867	-33	913	13	1034	-91	1065	-60	1247	-103	1217	-133	1551	1
Enfield	498	£922	£922	1171	1396	1645	595	£750	1000	1200	1460	1750	730	135	1065	£315	1217	217	913	-88	1853	653	1095	-105	2220	760	1278	-183	2616	866
Dartford	385	£673	£673	847	1047	1296	N/A	£575	725	875	1100	1500																		
Gravesend	385	£673	£673	847	1047	1296	450	£525	725	800	975	1200																		
Stevenage	340	£673	£673	847	1047	1296	370	£575	695	888	1050	1200																		
Harlow	331	£718	£718	897	1121	1296	N/A	£625	713	900	1150	1348																		
Grays	332	£698	£698	872	1072	1328	N/A	£605	725	858	1100	1400																		
Medway	315	£593	£593	747	847	1196	350	£495	595	750	850	1100																		
Slough	448	£797	£797	920	1271	1595	550	£625	788	950	1250	1450																		
Maidenhead	448	£797	£797	920	1271	1595	463	£700	850	1050	1300	1650																		
Basildon	332	£698	£698	872	1072	1328	350	£550	675	875	1050	1300																		
Luton	340	£575	£575	772	972	1146	375	£458	625	750	950	1150																		
Crawley	440	£747	£747	947	1196	1545	450	£650	800	975	1175	1450																		
Coventry	335	£488	£488	573	673	872	368	£410	505	625	695	900																		
Northampton	387	£548	£548	693	797	1017	433	£425	563	680	780	1050																		
Peterborough	284	£478	£478	593	693	897	340	£455	500	625	700	875																		
Bedford	344	£573	£573	723	872	1146	N/A	£470	550	700	850	1175																		
Leicester	338	£448	£448	563	673	892	325	£350	475	560	625	875																		
Birmingham	290	£523	£523	623	673	782	325	£450	550	650	695	900																		

NOTES:
Negative variance shows that pan London rate in area doesn't even meet lower quartile private sector rent and is therefore unlikely to be a viable option.
Self Contained rates include utilities payments where specified in pan London rates

Monthly Benefit caps

Benefit cap in London

£442.31 per week	Couple (with or without children) or a single parent:
£296.35 per week	Single person without children or not living with your children:
1916.68 per month	Couple (with or without children) or a single parent:
1284.18 per month	Single person without children or not living with your children:

Benefit cap outside London

£384.62 per week	Couple (with or without children) or a single parent:
£257.69 per week	Single person without children or not living with your children:
1666.69 per month	Couple (with or without children) or a single parent:
1116.66 per month	Single person without children or not living with your children:

APPENDIX 6

Good Homes Standard for homeless households living in temporary accommodation (February 2021)

Southwark Good Homes Standard (for homeless households)

We will place you in a home that:

- Has a tenancy in our name (with a rent review clause to ensure any future increases are fair and reasonable)
- Is big enough for your household in line with Part X of the Housing Act 1985 the Room and Space standard (details to of minimum property sizes is shown below in Table 1 and Table 2.)
- Is self-contained, with your own bathroom and kitchen
- Is clean & free from pests
- Is in a good, safe state of repair and decoration
- Has good condition floor coverings/finishes throughout
- Has a cooker and fridge that are in good, clean, working condition
- Has safe and working electrics, gas, heating, hot water and plumbing
- Has a working smoke alarm on every floor
- Meets or exceeds current energy performance standards

We will not place you in accommodation that has been converted from office to residential use through permitted development rights.

Before you move in we will ensure you have:

- A written contract, including clear details of when and how your rent should be paid
- A home inspection report/inventory, so you can verify the condition your home is in when you move in
- An up to date Gas Safety Certificate (less than 12 months old)
- An up to date Electrical Safety Condition Report (less than 5 years old)
- An up to date home Energy Performance Certificate
- Information on fire safety in your home, including for example whether the stay put policy applies to your home or not
- Full details of how to contact your landlord, including in the case of any out of hours emergencies
- Full details of how and when to contact the council, including a named council officer
- A tenancy pack setting out the key things you need to know about keeping your new home, and confirmation of your place on our accompanying training course
- Clear guidance on claiming any benefits you may be entitled to

Before you move in we will ensure your landlord inspects your home and provides you with a report for you to sign, this report will include the landlord checking to confirm:

- That the property is in a good, clean condition throughout and free from pests and hazards
- That the following are in good, clean working condition:
 - floor coverings
 - doors and door locks
 - windows
 - taps, sinks, baths, showers and toilet flushes
 - heating and hot water and their controls
 - lights
 - fitted cupboards and draws
 - any electric ventilation
 - any appliances & cookers
 - The details of any furniture, furnishings or appliances provided and its condition
 - The meter readings and contact details for all current utility suppliers, including water, gas, electricity, internet, telephone and digital TV.

Should you believe any of the above has not been satisfied as part of the initial tenancy sign up process, you will be able to escalate your concerns directly to the Council's Housing Supply Team. The team can be contacted via the Housing Advice line on 020 7525 4140 or via email housingsupply@southwark.gov.uk.

The Housing Supply team will assess the above standard and where necessary, the council will arrange a joint viewing to address the concerns before you move in.

We will only use accommodation that does not meet this standard:

- In emergencies where a household becomes homeless and we have not been able to arrange accommodation in advance. In this case we may use good quality licensed accommodation for up to 28 days while we find you a tenancy that meets the standard.
- For people who need accommodation that comes with onsite support. In this case we may place you in good quality supported housing, such as a hostel, foyer or refuge.
- For single households where the shared room rate applies and the rent would be unaffordable for them if placed into a self-contained unit.

Property size allocation

Table 1: Room standard

Number of rooms	Number of persons
1	2
2	3
3	5
4	7½
5 or more	2 for each room

Table 2: Space Standard

Floor area of room	Number of persons
110 sq. ft. or more	2
90 sq. ft. or more but less than 110 sq.ft.	1½
70 sq. ft. or more but less than 90 sq. ft.	1
50 sq. ft. or more but less than 70 sq. ft.	½

Please note, for the purposes of this assessment, children under 1 year will not be counted and Children aged between 1-9 will be considered as 1/2.

Repairs

It is noted there maybe repairs required in the property during the course of the tenancy. The welcome pack will include details of how to report a repair however should the agent/landlord not providing a timely response, your concerns can be escalated to the council. The Housing Supply team can be contacted via the Housing Advice line on 020 7525 4140 or via email housingsupply@southwark.gov.uk.

Item No.	Classification Open	Date: 4 th May 2004	Meeting Name Executive
Report title:		Leasehold Service Charge Loans	
Ward(s) or groups affected:		All Wards Affected	
From:		The Strategic Director of Housing	

RECOMMENDATIONS

The Executive is asked to agree:-

1. That the principle policy relating to the council's use of its discretionary power is that the council is only a lender of the last resort
2. That discretionary loans can be used either alone or in conjunction with a mandatory loan as individual circumstances dictate.
3. That the terms of any discretionary loans be those set out in Appendix A to this report
4. That the following administrative fees be charged initially and be index-linked and amended annually by the Strategic Director:
 - £175 in respect of discretionary loans alone
 - £75 in respect of discretionary loans granted in conjunction with mandatory loans
 - £100 for mandatory loans.
5. That any administrative fee or legal costs in respect of a discretionary loan is payable before the advance is finalised only being added to the loan when no other payment option is available.
6. That the professional cost of the conveyance including valuation, solicitors and land registration fee will also be recharged to applicants, payable on the same conditions outlined in paragraph (5) above.
7. That discretionary loans are only given subject to leaseholders proving their income is sufficient to meet payment and there is sufficient equity in the dwelling.
8. That loans are granted irrespective of the level of savings of an applicant.

KEY ISSUES FOR CONSIDERATION

9. The Housing and Planning Act 1986 amended the Housing Act 1985 to provide local authorities with the power to grant loans in respect of service charges. The legislation provides two service charge loan schemes: a mandatory code (The Right to a Loan) where the council must, upon request, grant a loan to cover the costs of larger service charges in respect of repairs; and a discretionary code which gives local authorities the power to grant loans either to help leaseholders who do not comply with the mandatory rules or to 'top up' mandatory loans which do not cover the whole amount of the service charge being demanded.
10. This report argues that service charge loans are an inherent part of any comprehensive service charge arrears recovery procedure and indeed that in certain circumstances individual leaseholders will have no alternative but to take a loan from the council to avoid possession proceedings. It further argues that the mandatory code is so restrictive as to be ineffective for many of Southwark's Leaseholders and that the sensible use of its discretionary powers will enable Southwark to properly deal with situations where large service charges are being levied. The Council will usually only be the lender of last resort, offering service charge loans only when other options have been explored and found to be unavailable to individual leaseholders.

Introduction

11. Section 5 of the Housing and Planning Act 1986 amended section 450 of the Housing Act 1985 by adding sections 450A, 450B, and 450C which provide local authorities (and certain other social landlords to whom the Right to Buy applies) with the power to grant loans in respect of service charges to leaseholders and their assignees. Section 450A deals with situations where a local authority must grant a loan, section 450B gives local authorities discretion to grant loans in other cases. These two schemes are examined in a little more detail later in this report.
12. Loans could not be granted by local authorities until six years after this primary legislation was passed when statutory instrument 1992/1708 (the Housing (Service Charge Loans) Regulations) came into force on the 17 August 1992. The reason for these powers being brought into play was to help leaseholders who found themselves in the poverty/red lining/negative equity trap. These provisions were the first in the series of four measures aimed at 'assisting' RTB leaseholders (the other three being the RICS Code, mortgage indemnity powers and the flat swap scheme) The regulations were aimed at two groups:
 - (i) leaseholders who, despite adequate income, could not get a loan in the private sector because of negative equity or because their block was 'system built' and
 - (ii) people on income support (now mainly OAP's) who would not be able to secure a private loan

13. The improvement in the property market has removed the negative equity problem but loans are still very important for the second group because DSS regulations strictly prohibit the payment of a capital service charge. The only way that elderly leaseholders could stave off action is to take a loan from the council (their only realistic lender) and claiming DSS 'interest only' Income Support.
14. Given that the only option to most private owner-occupiers, (asking their mortgagees to fund repairs or improvements), may not be available to Southwark's leaseholders, a sensible loan policy is the only alternative to recovery action. Having said this a discretionary service charge loan will usually only be agreed when other options have been investigated and exhausted. Such a process will include, for example, written refusal from private sector lenders to grant a loan.
15. Southwark does not have a complete policy governing the exercise of all of its discretions on service charge loans, although certain infrastructure and procedures to deal with applications for repayment schemes, established by a report to the Executive on 22nd October 2002, are in place. This report deals solely with loans secured as Mortgages on the property and sets out terms that are to be offered in addition to the repayment schemes set out in the 22nd October 2002 report.
16. The report on payment options that was agreed by Executive on 22/10/2002 included three payment schemes that were to be secured as mortgages on the properties. However these payment plans were neither as advantageous nor flexible as those envisaged in this report. Although the unsecured payment scheme over three years proved popular, with over 400 leaseholders opting for this method, very few applications were received for the interest bearing secured options. Records show that only one such mortgage loan was actioned.

Mandatory Scheme

17. The Right to a Loan prevails in only fairly limited circumstances, the essential parameters being:
 - (a) that the service charge is in respect of repairs and
 - (b) that the demand is between £2,000 and £20,000
 - (c) (Note: these are figures cited in the regulations, they are index linked annually to the RPI from January 1992 rounded up to the nearest £10) and
 - (d) the service charge is demanded in the first ten years of the lease and
 - (e) the leaseholder makes an application in writing within six weeks of receiving the demand and
 - (f) accepts the offer of a loan within four weeks of its being made.

18. The Right to a Loan only applies to that amount of a repair service charge over and above the first £1,500 demanded (this figure is also index linked as above). Thus should a leaseholder comply with the mandatory loan rules, they would still be left with £1,500 service charge debt unless the council agreed an additional discretionary loan amount to cover this amount.
19. The Right to a Loan prevails whether or not there is sufficient equity in the dwelling and irrespective of the leaseholder's income. All loans, whether mandatory or discretionary must be secured by a mortgage of the flat and must be at an interest rates set by the ODPM. These rates have historically been much higher than those offered by the private sector. Councils are duty bound to charge the higher of the standard national rate or the local average rate, the rate currently charged would be about 9%.
20. The 1992 regulations set out, at Schedule 1, the terms of mandatory loans which must apply and a maximum administration fee of £100 which must be added to the loan at the leaseholder's request.

Discretionary Loans

21. The Housing and Planning Act (1986) set down discretionary powers to grant loans in all other cases where the leaseholder (including their assignees) are liable under the terms of the lease to pay service charge in respect of repairs. The terms of a discretionary loan may be on such terms as the council may determine (Appendix A) and must be secured as a mortgage on the flat. Originally there was no discretion as to the interest rate to be charged however the Housing (Service Charge Loans) (amendment) (England) Regulations 2000 gave local authorities freedom to set their own rates for discretionary loans.
22. The collection of service charges from leaseholders must be vigorous. Quite apart from the council's fiduciary duty and the opportunity cost of late income, councils are under a duty to collect capital funded service charges due either during the financial year in which the money is spent or the following financial year. Capital funded repair service charge are not insubstantial - £5,000 is the norm and charges between £10,000 and £15,000 are not uncommon. Leaseholders may not have such lump sums saved. It is usual practice for most home owners to fund costly repairs from further borrowing but for some of Southwark's leaseholders who live in high rise system built blocks, lenders will not grant further mortgages because of the type of construction, even if the leaseholder has adequate income to pay. It should not be ignored either that lending institutions have, in the past, refused to grant mortgages on 'council blocks' citing management problems and funding of repairs as an excuse. Bearing this in mind it could be argued that equity dictates that councils offer discretionary loans as a matter of last resort when leaseholders cannot secure a loan elsewhere, either at all or without incurring severe financial penalties.

23. Earlier in this report the example of pensioner leaseholders was mentioned. If elderly leaseholders on limited pension income (with, say, some Income Support) receive a large service charge demand they may have no way of paying: there is no 'rent rebate' equivalent for service charges and DSS rules specifically prohibit the payment of capital service charges. The pensioner leaseholder could be facing eviction and would not be able to secure a loan in the private sector. The option would be to take a council loan, in these cases the DSS will pay the interest only on the loan direct to the council.
24. Having examined situations where the sensible use of its discretion saves the Council costly arrears recovery action and keeps people in their homes, it must be countered there are situations where other interests argue against the exercise of the Council's discretion or suggest it is only used in exceptional circumstances. As mentioned above, a mandatory loan must be given irrespective of adequate equity in the flat or the leaseholders income – this is not the case for discretionary loans. The council has a fiduciary duty to its rent and property tax payers and where it can, it should secure the loan against a property that has sufficient equity should the loan be defaulted. In addition proper checks should be made to ensure that a leaseholder will be able to finance the additional mortgage.
25. The situation that arises when a flat is sub-let also needs consideration. Right to Buy leaseholders have the right to sublet their flat. In doing so they make a commercial decision and as they are not using the property as their only or principal home it is questionable whether or not a discretionary loan should be given in respect of service charges. Having said this, it is dangerous to have a policy which prohibits sublet flat leaseholders being offered a loan because sometimes these leaseholders have no alternative but to sublet. There are occasions where elderly leaseholders have to sublet their flat, having moved into private care accommodation, because they cannot sell their high rise flat. Indeed some leaseholders may have moved away to find work, are living in private rented accommodation use the rent from subletting the flat to over the mortgage. In all cases it seems more equitable to look at the individual circumstances prevailing to determine whether or not a loan should be granted.
26. The 1992 regulations give local authorities discretion to charge any level of fee for discretionary loans so that the Council can recover its administration costs. It is proposed that this is set at £150. The regulations also allow, in the case of discretionary loans, for the council to insist that the fee is paid separately rather than adding it to the loan. It is proposed that this power is used and that the fee is only added to the loan when there is no alternative. Similarly the Council's professional costs for conveyancing, valuation and land registration etc will be recovered separately from the leaseholder, only being added to the loan in case of severe hardship.

Leaseholder Council

27. The Leaseholder Council received a report on service charge loans at its meeting a Monday 26th January 2004. The following observations were made:
 - (a) that the rate of interest for discretionary loans could be borrowing rate plus 1% to cover administration costs.

- (b) that a fee level of £150 be set additional to valuation and conveyancing fees
- (c) that the Strategic Director of Housing be granted discretion to add fee charges to loans
- (d) non resident leaseholders should not be granted loans except in exceptional circumstances agreed by the Director of Housing.
- (e) companies should not be eligible for discretionary loans
- (f) a fee level of £75 be charged in addition to conveyancing costs for mortgage redemption
- (g) loans should not be granted where there is no equity
- (h) that the Strategic Director of Housing be given discretion to allow top up discretionary loans to mandatory loans
- (i) the loan period to be a maximum of 25 years
- (j) Leaseholder Council to be provided with the agreed procedure for dealing with service charge loans.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Borough Solicitor & Secretary

28. The legal basis for the Council's power to make service charge loans derives from sections 450A, 450B and 450C of the Housing Act 1985, as amended. The Secretary of State introduced regulations to bring the service charge loan provisions of the Housing Act into force with effect from 17 August 1992, when the Housing (Service Charge Loans) Regulations 1992 were made. The regulations have since been amended by the Housing (Service Charge Loans) (Amendment) (England) Regulations 2000. The effect of the principal legislation and the regulations is set out in the body of the report. The existing scheme of delegated authority is sufficient to allow officers to offer leaseholders loans using the council's discretionary powers.
29. The Executive will note that in certain, fairly limited, circumstances a lessee has the right to receive a service charge loan from the Council. The Council has a wider discretion to grant loans in other circumstances or to provide additional assistance to lessees who are unable to make the minimum contribution which is expected under the mandatory scheme. In agreeing a general policy for application in connection with the discretionary service loan scheme the Executive will wish to be satisfied that the scheme strikes a fair balance between the needs of individual lessees, particularly those in hardship, and the Council's general fiduciary duty to recover all monies owing to it and to manage its resources effectively in the interests of the community as a whole.

Chief Finance Officer

30. The authority has a statutory obligation under the Statutory Instrument 1992/1708, The Housing (Service Charge Loans) Regulations 1992, to offer loans to leaseholders. These regulations require mandatory loans to be charged at the Council's consolidated rate, currently 9.376%. For discretionary loans, the authority is expected to charge a "reasonable" rate of interest and this has been determined by the Council's Chief Financial Officer to be base rate +1.5%.
31. The proposal to offer discretionary loans at base rate +1.5% (currently equivalent to a rate of 5.5%) is clearly more favourable to leaseholders than the mandatory scheme and should assist in achieving improved collection performance in respect of major works service charges. The Council's interests will be protected by securing these loans against the property.
32. Neither scheme will entail any additional costs to the HRA. Reduced interest on cash flow received by the HRA will be offset by the interest paid on service charge loans and all administrative costs relating to the operation of the scheme will be recovered through charges levied in advance as set out in Appendix A.

Conclusion

33. Procedures will be put in place to ensure Council widely 'advertises' the Right to a Loan. To this end major works service charge invoices will contain relevant information from January 2004 and the new Right to Buy computer system can provide for the Right to Buy offer notices to similarly contain relevant information based on the policies proposed by this paper.
34. Detailed procedures will also be produced dealing with all aspects of mandatory and discretionary loans setting out the work of both the Housing and Finance Divisions but with emphasis on the criteria staff are to use when making a decision on whether or not to grant a discretionary loan. The procedures will be agreed by the Strategic Director of Housing to ensure they are robust enough to withstand any challenge to the power to exercise discretion in making a loan.
35. This paper recognises the fact that a service charge loan may be the only option available to a leaseholder to pay a large service charge demand and, so long as the Council's fiduciary interests are protected, Southwark should use its discretion to offer loans. The granting of loans will be an inherent part of a comprehensive service charge recovery procedure ensuring that leaseholders have as many options as possible for paying charges properly levied.
36. It should be noted that this policy contributes to one of the Council's principle Community Strategy objectives of 'tackling poverty'.

Background Papers		Held At	Contact
Leasehold Service Charge Loans		Leasehold Management Unit, 113 Lorrimore Road	Martin Green 51418
Lead Officer	Keith Broxup - Strategic Director of Housing		
Report Author	Martin Green		
Version	Final		
Dated	23.04.04		
Key Decision?	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER			
Officer Title		Comments Sought	Comments included
Borough Solicitor & Secretary		Yes	Yes
Chief Finance Officer		Yes	Yes
List other Officers here			
Executive Member		Yes	No
Date final report sent to Constitutional Support Services			23 rd April 2004

Appendix A

Terms of Discretionary Service Charge Loans

1. The loan will be secured on the property to which the service charge relates and charged at the Land Registry and that the mortgage agreement allows the mortgagee Landlord to add further amounts to the loan in the circumstances where future service charges for repairs are not paid in accordance with the terms of the lease.
2. The rate of interest to be charged will be variable be set at 1.5% above the base rate.
3. The loan is granted on using the annuity method with equal instalments comprising of both principal and interest.
4. The loan is repayable by monthly instalments due on the 15th day of each month.
5. In the event of any default on the loan interest will be charged at the prevailing rate seven days beyond the due date.
6. The offer of a loan is granted subject to the financial status of the applicant and the equity remaining in the property. Loans will be granted irrespective of the level of savings of applicants but income checks will include interest on any savings.
7. The maximum period of the loan is 25 years.
8. The administration charges will be payable before the advance is finalised and will only be added to the loan when no other option is available. The administration charge will be as follows:
 - £175 for discretionary loans alone.
 - £75 for discretionary loans granted in conjunction with mandatory loans.
 - £100 for mandatory loans.

And thereafter be index-linked and amended annually as appropriate by the Strategic Director of Housing.

9. Professional costs of conveyancing including valuation, solicitors and land registry fees will be recharged to applicants and payable as (8) above.
10. Discretionary loans will not be given to private companies and to non resident leaseholders only in exceptional circumstances.

APPENDIX 2

Date: 04 March 2020

Property Reference Number: XXXX

Customer Discretionary Service Charge Information Document

Name(s):

Property:

Correspondence Address:

1. Whose mortgages do we offer?

The London Borough of Southwark (LBS) will only offer its own mortgages (secured loans against the property) to its own tenants for their service charges. These loans are only available to LBS tenants for Major Works bills.

The mortgages we offer are very limited. Which loan you can apply for will depend on your circumstances.

2. What assistance will we provide you with?

You should think carefully before taking out a secured loan. If you do not keep up with repayments you could lose your home.

Your application for a loan will be made on an 'execution only' basis. This means **no advice will be given to you** regarding the secured loan you are applying for and you will have to make your own decision whether to take the loan if one is offered.

However, appropriate information will be given to you so you can make an informed decision.

You should seek mortgage or financial advice before applying for a secured loan (mortgage). It would also be wise to shop around as there might be a better deal or an option more suited for you. This might include approaching your current lender, if applicable.

If you decide to apply for one of our loans we will provide several different financial illustrations based on the amount you are borrowing. If applying for a monthly repayment loan, we will also provide an 'European Standardise Information Sheet' (ESIS) which provides a more detailed explanation of the choice you have indicated

you would prefer. If this is not the option you would like to proceed with, then we will supply you an ESIS for one of the other options. You will need to make your own choice if you would like to proceed with the secured loan.

3. What costs are there and how do LBS generate revenue?

A fee of £600.00 is payable for administration and legal fees. You have the option to either pay it up front or roll it into the loan. This fee changes on the 1st April annually based on inflation and any changes in costs.

If you require additional finance from us for future service charges, you will have to go through the application process again. The fee will be payable if further advances are added (subject to application) to your current loan. Again, this might be able to be rolled into the sum of the mortgage or may need to be paid up front. The fee changes on the 1st April annually based on inflation and any changes in costs.

Simple interest will be charged on the amount you borrow. Interest is calculated annually, automatically applied monthly, but accruing daily. Assuming interest rates stay the same, if you have a monthly repayment loan, you will have the same monthly payment throughout the term of the loan. The monthly repayment will consist of both interest and capital. The interest rates are variable and track the Bank of England base rate so your interest rate may go up and down which means your monthly payments could too.

A redemption fee will be payable on final settlement of the loan and all additional advances. This is presently set at £115.00 but changes on the 1st April annually based on inflation and any changes in costs.

If there is already a charge e.g. a current mortgage on the property, we will have to seek consent of the charge holder(s) involved e.g. your other mortgage lender. These parties may directly charge you an administration fee which is not covered by our application fee.

If we make you a conditional mortgage offer (subject to further searches and checks), we will seek your written consent to proceed before instructing our solicitors to send you the legal deeds to sign. Once you have given us permission, the administration and legal fee for the application will become payable even if the application is cancelled.

4. Refunds

The administration and legal fee are not refundable once the conditional offer has been accepted, even if the application is cancelled and the legal deeds not signed. We will not instruct the solicitors until you have signed the conditional offer.

Refunds on loans will not be available during the lifetime of the loan. Refunds will only be given if an overpayment is made to redeem the loan.

5. What to do if you have a complaint

If you have a complaint, please contact the Mortgage Manager using the following details:

Hsg.homeownership@southwark.gov.uk

0207 525 5000

If you are unable to resolve your issue with the Mortgage Manager, please write to the Southwark Complaints team using the following details:

complaints@southwark.gov.uk

020 7525 0042

If you cannot settle your complaint with us, you may be entitled to refer it to:

Local Government Ombudsman

<https://www.lgo.org.uk/>

0300 061 0614

Conditions

- You must be a Southwark Council Leaseholder if applying for a LBS loan;
- All leaseholders on the property title must be applicants and will be liable for the loan;
- The leaseholders must reside in the UK;
- The property owner cannot be a company;
- The loan may be granted only in respect of service charges for repairs and improvements;
- There is sufficient equity in the property to secure the loan;
- The borrower(s) allows LBS to access information on the borrower (s) and their property including current charges on their property, credit checks, and affordability checks;
- All lenders and other interests on the property title consent to the charge being registered against the property;
- The borrower(s) provides the Council with details of income and expenditure;
- Lifetime Tracker Mortgages are reserved for those suffering from extreme hardship and may have to apply for the repayment loan as part of a means test. The borrower maybe required to supply a medical document of their condition from a qualified medical professional;

Terms

- The loan will be secured by a legal charge on the borrowers property;
- Repayment loans will be repayable by instalments of both capital and interest over the duration of the contract;
- Lifetime Tracker Mortgages require no payments. Interest is rolled up into the mortgage.
- The loans will also be repayable upon the death of the leaseholder (or last surviving leaseholder in the case of joint purchasers) or the sale of the property or re-mortgage.
- The rate of interest will be variable and will track the Bank of England Interest rate.
- For our standard repayment discretionary loan the interest rate is currently at 1.5% above the base rate of the Bank of England, which is at this time 0.1%;
- For our Lifetime Tracker Mortgages the interest rate is currently at 2.0% above the base rate of the Bank of England, which is at this time 0.1%;
- The borrower will pay a fee of £600.00 to cover administration and legal fees to complete the mortgage deed;
- The borrower may repay the loan in full at any time without incurring penalties;
- The borrower may make additional capital payments from time to time so long as these exceed £100.00 per payment. These will not be capitalised unless we have written instructions to do so;
- Should the borrower wish to add additional service charges to the loan, they will have to go through the application process again. If they granted additional funds, a £600.00 administration & legal fee is required;

- The borrower will pay a redemption fee of £115.00 (subject to change during the life of the loan) on final settlement of the loan and all further advances, if any;
- Refunds will not be issued unless an overpayment is made on redemption;
- The maximum amount you are able to borrow will be restricted to the service charge bill(s) plus the application fees.

If you would like more information about getting a loan, please sign this document to state you have read and understood the information we have given you above. We will as standard send you information about the discretionary repayment loan based on the preferences you tell us e.g. length of term. Please send the document to either of the following contact details below and we'll be in touch.

Hsg.homeownership@southwark.gov.uk

or

Home Ownership Services
Mortgage Team
PO Box 71994
SE1P 5FW

Property:

Print Name(s):

Signature(s):

Date:

Property:.....

Contact number:

Email:

Loan amount:.....

Length of loan:.....

Loan application fee to be rolled into loan?Yes / No.....

APPENDIX 3

Current	Who is allowed to apply for the product?	Tracker Interest Rate Above BoE Base Rate	Collar	Cap	Repayment	Early Repayment Penalties	Application Fees Per Charge	Redemption Fees Per Charge (subject to increase)	Overpayment Capitalisation	Refund or overpayment	Ability to Switch Product	Portable	Charge Postponements
Tracker Repayment	Southwark leaseholders who are a resident or non-resident who can't get funding elsewhere. Not applicable for companies. Must be a UK resident and the loan may be granted only in respect of service charges for repairs and improvements.	1.50%	No	No	Monthly towards capital and interest. Full payment of remaining balance upon death, remortgage, selling the property or breaking the terms of the legal charge or/and lease	No	£600		Discretionary Upon Request. Payment must be £100+	Only after redemption	No	No	Only RTB in discount period for Home Improvement or Remortgage - legal requirement
Tracker Deferred Repayment	Southwark leaseholders who are a resident who can't get funding elsewhere that meet the exceptional hardship criteria. Not applicable for companies. Must be a UK resident and the loan may be granted only in respect of service charges for repairs and improvements.	2%	No	No	No monthly repayments. Full payment of remaining balance upon death, remortgage, selling the property or breaking the terms of the legal charge or/and lease	No	£600	£115	Discretionary Upon Request. Payment must be £100+	Only after redemption	No	No	Only RTB in discount period for Home Improvement or Remortgage - legal requirement
New	Who is allowed to apply for the product?	Tracker Interest Rate Above BoE Base Rate	Collar	Cap	Repayment	Early Repayment Penalties	Application Fees Per Charge	Redemption Fees Per Charge (subject to increase)	Overpayment Capitalisation	Refund or overpayment	Ability to Switch Product	Portable	Charge Postponements
Resident Tracker Repayment	Southwark leaseholders who are a resident or non-resident who are 'incidental' landlords through their circumstances. Not applicable for companies. Must be a UK resident and the loan may be granted only in respect of service charges for repairs and improvements.	2.50%	2.50%	No	Monthly towards capital and interest. Full payment of remaining balance upon death, remortgage (potentially), selling the property or breaking the terms of the legal charge or/and lease	No	£600	£115	Discretionary Upon Request. Payment must be £100+	Only after redemption	Yes - if meet exception hardship criteria	No	Yes
Non-resident Tracker Repayment	Southwark leaseholders who are non-resident for commercial reasons. Not applicable for companies. Must be a UK resident and the loan may be granted only in respect of service charges for repairs and improvements.	4%	4%	No	Monthly towards capital and interest. Full payment of remaining balance upon death, remortgage (potentially), selling the property or breaking the terms of the legal charge or/and lease	No	£600	£115	Discretionary Upon Request. Payment must be £100+	Only after redemption	Yes - if meet exception hardship criteria	No	Yes
Deferred Tracker Repayment	Southwark leaseholders who are a resident or non-resident who are 'incidental' landlords through their circumstances that meet the exceptional hardship criteria. Not applicable for companies. Must be a UK resident and the loan may be granted only in respect of service charges for repairs and improvements.	2%	2%	No	Full payment of remaining balance upon death, remortgage (potentially), selling the property or breaking the terms of the legal charge or/and lease	No	£600	£115	Discretionary Upon Request. Payment must be £100+	Only after redemption	Yes - if no longer meet exception hardship criteria	No	Yes

CABINET APPENDICES DISTRIBUTION LIST (OPEN)**MUNICIPAL YEAR 2020-21**

NOTE: Original held by Constitutional Team; all amendments/queries to
Paula Thornton Tel: 020 7525 4395

Name	No of copies	Name	No of copies
Cabinet Members		Officers (electronic)	
Jasmine Ali	1	Eleanor Kelly	
Other Councillors		Doreen Forrester-Brown	
Jane Salmon	1	Relevant strategic director (<i>amend as relevant</i>)	
Electronic Versions (no hard copy)		Others (electronic)	
Kieron Williams		Paula Thornton, Constitutional Officer	
Evelyn Akoto		Total: 2	
Helen Dennis		Dated: 17 February 2021	
Stephanie Cryan			
Alice Macdonald			
Rebecca Lury			
Catherine Rose			
Johnson Situ			
Ian Wingfield			
Victor Chamberlain			
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