Item No.	Classification: Open	Date: 12 March 2021 2020	Meeting Name: Cabinet Member for Council Housing		
Report title:		Final design of the intermediate rent housing list			
Ward(s) or groups affected:		All			
From:		Strategic Director of Housing and Modernisation			

#### RECOMMENDATIONS

- 1. To agree the Southwark Intermediate Rent Policy (Appendix A) including the eligibility criteria and priority system.
- 2. To agree to review the Southwark keyworker definition on a two yearly basis based on emerging evidence of recruitment and retention issues.
- 3. To agree to delegate authority to the Strategic Director of Housing and Modernisation to adjust the Southwark Intermediate Rent Policy as required to accommodate GLA requirements in relation to particular discount market rent products, and changes in the Council's planning and housing policy.

#### **BACKGROUND INFORMATION**

- 4. Intermediate rent is housing at rents above social rents but below 80% of market rent. In Southwark these will be mainly let at the London Living Rent levels which are set by the Mayor of London and significantly lower than market rent. A lower rent is charged to help allow the household to help save up a deposit towards buying a shared ownership or private property. These properties are ideally suited for people for people who want to remain living in Southwark, who cannot yet afford to buy on their current salaries, and who are struggling with paying high rents in the private rented sector. A key example would be a household containing a teacher who needs more space for their family but cannot afford this in the private rented sector.
- 5. In July 2019, following a public consultation, Cabinet agreed to continue with plans to introduce an intermediate rent housing list, along with the outline eligibility criteria and priority system for the new intermediate rent housing list. The Leader of the Council also agreed to delegate authority to the Cabinet Member for Housing Management and Modernisation in consultation with the Strategic Director for Housing and Modernisation to agree the final design of the scheme, once the London Plan has been adopted.

- 6. The Council wants to introduce a new intermediate rent list to help ensure any new intermediate rent homes are going to those who need them most and help address other issues such as difficulties with the recruitment and retention of keyworkers in Southwark.
- 7. Some new intermediate rent homes are likely to be developed on purpose built private rental developments following changes with national planning policy in the national planning policy framework (NPPF). These changes allow the affordable housing element of a new purpose built private rental scheme to be met though a below market rent product. The London Plan 2021 directs the affordable housing requirement on purpose built build to rent developments towards London Living Rent or similar discounted market rent products. Policy P4 in the New Southwark Plan sets out the Council's requirements on build to rent schemes, including the requirements for affordable housing, including the provision of affordable rent capped at London Living Rent equivalent. The new intermediate rent housing list and policy will help ensure any properties developed at these lower rents go to households in most need of these properties.
- 8. The Intermediate Rent Housing List will not be used for shared ownership housing which will continue to be allocated through the Mayor of London's online portal, but this list will be used to help raise awareness of shared ownership opportunities for those who register an interest in this.
- 9. In December 2017 Cabinet directed officers to publically consult on proposals for the intermediate rent housing list. The consultation ran from July 2018 to the end of November 2018. The consultation covered the eligibility criteria, priority star system and some questions about what should happen at the end of a fixed term tenancy where circumstances have changed. The July 2019 Cabinet report provided feedback on that consultation.

#### Planning policy changes

- 10. During and following the consultation there were some changes at national, London and local level which have complicated the position and impacted on the proposals.
- 11. In September 2018 the Government published Build to Rent guidance. <u>https://www.gov.uk/guidance/build-to-rent</u>. The guidance stated that

"Eligibility should be agreed locally between the local authority and the scheme operator, final decisions over the occupancy criteria should be made by the build to rent scheme operator, working with the local authority.... Authorities must take a reasonable position in negotiating occupancy criteria with build to rent developers, and eligibility should not constitute grounds for refusing a planning permission...Eligibility criteria should be determined with regard to local household income levels, related to local rent levels."

12. In regard to nominations the national planning guidance states:

"Where authorities maintain an 'intermediate housing list' they may wish to suggest names from this, or potentially even their Statutory Housing list, taking into account the affordability of the homes to those on the list....Authorities should refrain from having direct nomination rights from their housing list."

13. On 2 March 2021, the Mayor of London published the London Plan 2021. The London Plan 2021 is the spatial development strategy that sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Southwark. The London Plan 2021 includes Policy H11 Build to Rent which states that "Where a development meets the criteria set out in Part B, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. Supporting text Paragraph 4.11.4 also states

"DMR should be allocated according to intermediate eligibility criteria, which can include locally defined criteria. Where the borough has an intermediate or DMR waiting list they should agree with the applicant a process for providing priority access to the DMR units for those on the waiting list."

14. The New Southwark Plan has been submitted to the Secretary of State and the examination in public process has now commenced, the Plan is expected to be adopted later in 2021.

# Southwark Council's role in developing and providing intermediate rent homes

- 15. The Council has previously been prevented from charging intermediate rents within the Council's housing revenue account due to rent restrictions. However the rules changed in 2019 which presented a new opportunity for the Council to let specific units to keyworkers on intermediate rents. The Regulator for Social Housing (RSH) issued a new standard and guidance on the 24 September 2019 and this new standard has applied since April 2020. The guidance (in section 5.1) includes excepted categories of accommodation, of which one is intermediate rent accommodation. Section 5.4 states "intermediate rent accommodation' means low cost rental accommodation which satisfies either (a), (b) or (c) below". Option c is that the accommodation is keyworker housing. There are still restrictions in the Rent Standard which limit what the Council can do with existing social rent stock. In particular at point 2.33 which states that "social rent properties may not be converted to intermediate rent."
- 16. Broadly councils must not allocate housing except in accordance with their social housing lettings scheme. However, the Council may depart from this scheme where it puts in place a local lettings policy which prioritises

particular groups of applicants for particular properties. So a local lettings scheme would be required for any units which would be restricted for keyworkers, and the Council would be required to consult on this.

- 17. In April 2020 Cabinet agreed to let 36 intermediate rent units (as set in planning agreements) on the acquired Churchyard Row block to keyworkers using these new powers, subject to consultation and agreement on a local lettings scheme for the allocation of these units. Due to the covid-19 pandemic the decision was made in the short term to let these units out as temporary accommodation but they will revert to use an intermediate rent in due course. The initial proposal was to let these to teachers and social workers which could be easily identified, until the intermediate rent list was agreed. At this point the lettings would widen out to all keyworkers on the list.
- 18. The Council has a target to build 11,000 council homes by 2043. Due to the need to comply with planning policies and to generate cross subsidy, the Council may choose to develop a supply of intermediate rent homes on council developments in future. Under the current rules these would currently need to be restricted to keyworkers to comply with the rent standard. Any decision to develop intermediate rent homes directly will be covered in a later report.

## KEY ISSUES FOR CONSIDERATION

- 19. In July 2019 Cabinet agreed the overall eligibility criteria and the priority categories for the intermediate rent housing list and there is no proposal to change these. There may be need to review this after a year from when the list becomes operational to see how well the eligibility, priority categories and priority system are working and to consider any unforeseen equalities impacts.
- 20. The Council is now proposing a slightly different allocation procedure which is more in line with new national guidance which emerged during the consultation. This will still help ensure properties go to those who need them most. The Council will still hold an intermediate rent housing list, which will be used to raise awareness of new schemes as they become available, but the landlord will ultimately decide the allocation in line with the Council's intermediate rent housing policy (Appendix A). The Council will not do the allocation unless the Council is the landlord to comply with national planning policy guidance and legal restrictions on allocations.

## Eligibility

21. The July 2019 Cabinet paper agreed the following eligibility criteria to join the intermediate rent housing list:

## Eligibility criteria

The main applicant must be aged 18 or over and:

• have lived in Southwark for the last 3 years; or

- be a key worker working in Southwark (or in a neighbouring hospital which routinely provides services for a significant number of Southwark residents) <u>or</u>
- be a Southwark resident who is fleeing domestic abuse

The whole household (which can be formed of two or more unrelated households or sharers) must have a :

- maximum combined income of £60,000; and
- minimum combined income of £26,000

Members of the household must not:

- be an existing homeowner, unless the current property is unsuitable (overcrowded/disabled access/unaffordable) and the household is unable to buy in the private market.
- have been guilty of unacceptable behavior serious enough to make them unsuitable to be an intermediate rent tenant
- 22. There will be a need to update both the maximum and minimum income thresholds. These will be updated annually in response to changes by the Mayor of London to the London Living Rent scheme. In the case of the minimum income, this will be based on the income required to afford the London Living Rent level in the cheapest ward, with a third of income be used on rent. For the maximum income this will be the maximum income cap set by the Mayor of London.
- 23. Households will only be able to express an interest in properties which have the number of bedrooms they require, unless the household is two or more keyworkers looking to share a tenancy together. There will be discretion where there may be medical circumstances where an additional room is required. This decision will be made by the landlord and the Council should be informed. For council properties such decisions will be delegated to the Strategic Director of Housing and Modernisation and made in line with similar polices for our council rented accommodation.
- 24. Households formed of two or more keyworkers will be allowed to share a property. There was support for this aspect in the consultation. This will enable lower income keyworkers to join together to meet the minimum income threshold. Residents will be permitted to jointly register their interest. If one resident moves then this will end the tenancy upon the joint tenant relinquishing the tenancy. The landlord however can review the case and if agreed, grant a tenancy to the remaining tenant if they can afford the rent, or choose to allow the resident to identify a new keyworker to share with, who would then be named on a joint tenancy.

#### The prioritisation system

25. The July 2019 Cabinet paper contained a prioritisation system, where some categories of people would qualify for priority stars. Where applicants had the same number of priority stars, priority would have gone to those who

had been on the waiting list for the longest time. Where this resulted in a "tie" there would have been a lottery system to decide who was considered to have the highest priority.

- 26. Under the new arrangements in this report, households will be able to register interest to the landlord through the intermediate rent housing list portal. This will include details on the priority band status to help the landlord apply these priorities and to make the allocation. In the case of registered providers, residents will also be able to register an interest directly with the registered provider, including details of priority categories which apply. The Council will work closely with landlords and developers, to maximise the number of lettings which go to high priority band households. Where multiple households have registered an interest and have the same priority banding, the Council would recommend landlords consider the date the register of interest was submitted.
- 27. Cabinet agreed to retain all the priority groups included in the consultation proposal. These were:

<b>Priority Grou</b>	ps						
Key workers							
Victims of domestic violence/abuse/harassment							
Carers							
People fostering or adopting who need more rooms							
Armed Forces personnel							
Private rente	d sector	tenants	who	are	being	displaced	through
regeneration							

- 28. The July 2019 Cabinet report agreed to include private rented sector tenants who are being displaced through regeneration. This would help support regeneration and help households who would not be considered to be in priority need to stay in the borough. This could also include residents displaced by regeneration activity, living in households who are not the main tenant. This will be regularly updated as required by the relevant Cabinet Member in consultation with the Strategic Director for Housing and Modernisation.
- 29. In the case of any intermediate rent properties on Churchyard Row, or any potential future council intermediate rent units, if these were let through the Council's housing revenue account, these could only be let to keyworkers as per the current terms of the Rent Standard, and only following consultation and agreement on a local lettings policy for these units.

#### Keyworker definition

30. The July 2019 Cabinet report agreed that keyworkers should be prioritised however it was also agreed that more work was required to provide the solid evidence of recruitment and retention issues to justify prioritising types of key workers. It stated that "This final definition will be included in the IDM report on the final design of the scheme." The report also agreed this should

be aligned with the definition used in the social housing allocation scheme.

- 31. Officers have now collated the evidence base of recruitment and retention issues for the proposed keyworker types. This is included in Appendix B. This demonstrates clear recruitment and retention issues across all proposed sectors.
- 32. Therefore the definition will initially include the following:

Option			
Nurses, doctors, and other clinical staff employed by NHS			
Firefighters			
Teachers/teaching assistants (from non-fee charging schools)			
Social workers, educational psychologists and therapists delivering			
services for the Council			
Police officers/Police Community Support officers (PCSO)			

- 33. The definition will need to change over time in response to changes in the evidence provided of recruitment and retention issues. Therefore the recommendation is to agree to delegate authority to Strategic Director of Housing and Modernisation to review the Southwark keyworker definition on a two yearly basis based on emerging evidence of recruitment and retention issues, in consultation with the appropriate Cabinet Member.
- 34. There will be no requirement to have a long term contract in place, however the keyworker would be required to meet the keyworker criteria at the point of registering an interest in a property and at the point of any tenancy signup. For those on short term contracts, having more secure housing may hopefully result in the tenant seeking further work in Southwark at the end of any contract.
- 35. The July 2019 Cabinet Report recommended that the priority for keyworkers is restricted to key workers working in Southwark and to hospital staff in neighbouring boroughs where the hospital routinely provides services for a significant number of our residents.

#### The online registration system

- 36. The Council will use an in-house online system to help administer the registration of interest in properties via the intermediate rent housing list. This will be branded separately from the existing social housing register. Households will be able to be on both lists provided they meet the eligibility criteria. This process will be carefully designed to make it clear that this intermediate rent housing list is very different to the social housing list.
- 37. The registration process will ask a few questions to confirm eligibility and applicable priority bands. It will also ask about their contact preferences for properties that become available. For example, to only receive notifications

about properties in a particular area. People will be able to update their details on the intermediate rent housing list at any time.

- 38. When a property becomes available for letting the landlord will request a notification to go out to all those who have consented to this, to ask them if they want to register their interest in the property. This will include a link to further information about the property including a virtual tour if possible. This will be the responsibility of the landlord to organise. There will be a clear deadline. The landlord will need to include information about how any data they receive will be handled as per GDPR requirements.
- 39. In the case of any discount market rent and or London Living Rent properties developed with funding from the Mayor of London, the landlord would also be required to fulfil the requirements stipulated by the Mayor of London. This will include advertising the property on the Homes for Londoners website. The property advertisement will include details of how to register interest to the landlord, either through the intermediate rent housing list portal or directly to the registered provider. The letting should still be allocated by the registered provider according to Southwark's intermediate rent policy.
- 40. Those on the intermediate rent housing list will be able to express an interest in a property through the Council's portal. They will firstly be asked to update their details. The portal will then add their details to their register of interest. They will be asked to confirm they are happy for their data to be shared with the landlord. The portal will then securely email the details to the landlord, including whether they fall within any priority banding to enable the landlord to make the allocation in line with the Southwark intermediate rent housing list policy. Registered providers will also be able to contact people who have registered their interest directly with them, whether or not those people have registered with the Council's intermediate rent housing list, provided they have the details about which priority bands apply.
- 41. As per guidance from the Mayor of London, in the unlikely event that property is not let within three months of advertising, the eligibility criteria would revert to the broader criteria as set by the Mayor of London.

#### Advice and support

42. While the focus will be on providing advice online, there will be need for some advice and support, to help with problems registering and for advice in terms of the product and affordability. This would cover mainly technical system issues and basic qualification criteria. The landlord would provide any scheme specific information or advice.

#### Data validation

43. It will be up to the landlord to validate the information on income and priority status of the successful household, and to demonstrate they have done so

prior to any letting being agreed. It is advised that this happens before the viewing stage to avoid wasted visits.

## Viewings

44. The landlord will be responsible for agreeing their own process for conducting the viewings, which may include up to three households (if safe to do so), in case the lead household (identified by the provider) does not take up the letting.

## Tenancy signup

45. The landlord will do the tenancy sign up and be required to inform the Council of who was successful and why they were chosen. The Council will use this information to update the intermediate rent housing list, to assess how well the prioritisation system is working and to help consider the potential equalities impacts.

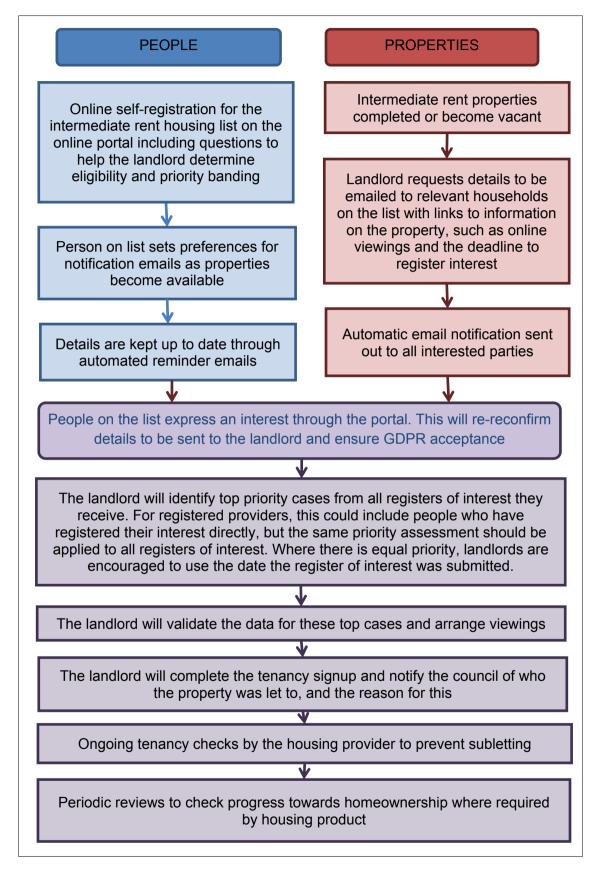
#### Ongoing relationship with tenant

46. Following the signup there will be no relationship between the Council and the tenant, unless the Council is the landlord. Issues like repairs and rent arrears will be a matter directly between the tenant and the landlord. The landlord will need to conduct regular tenancy checks to prevent subletting given that this will be a sub market rent product. The landlord will be encouraged to provide advice about building up savings for a future deposit, and details about other potential housing options such as shard ownership.

#### **Tenancy reviews**

47. It will be up to the landlord to decide on the tenancy length beyond a minimum three year period. Tenants will be expected to try to use the lower rent to save up to buy an alternative property such as a shared ownership property. The landlord will be expected to conduct a tenancy review towards the end of any fixed term period. Where the tenants income has not increased above the cap there will be an expectation that the tenancy will be extended. Where a tenant's income has significantly increased the landlord will be expected to suggest alternative options, and could choose to end the tenancy in order to use the property to help a lower income household. This should be sensitively handled to prevent the tenant being made homeless through the process.

## Summary of the process for registering interest in properties



48. The Council is aiming to have the intermediate housing list fully operational by next winter. Until the intermediate housing list is operational, landlords should advertise any opportunities themselves and let any intermediate rent properties in line with the eligibility and priority systems included in the intermediate rent policy (Appendix A).

#### Post implementation review

49. Following the implementation of the list, it is also proposed that the eligibility criteria, priority categories and priority system are reviewed after one year to see how well these are working, for example the number of households in each priority category, and the number of lets going to each priority category. This will also include an analysis of the equalities data gathered.

#### **Policy implications**

- 50. The Intermediate Rent Housing List will be kept separate from the social housing allocations scheme so will not impact on how the Council meets it duties under the 1996 Housing Act Part VI. However, some households could be on both lists. For simplicity there will be need to ensure consistent wording in some areas between the two schemes, such as around armed forces, domestic violence, fostering, key worker definitions etc.
- 51. The proposals in this report will help deliver the Southwark Housing Strategy 2020. The strategy committed to introducing a new intermediate rent housing list which will prioritise intermediate housing for Southwark key workers and other set priority groups. The Strategy also referred to the "Routes to 11,000: a new council homes strategy for Southwark", which was agreed in April 2020. This set out our plans including: building additional council intermediate housing, including shared ownership and intermediate rent.

#### Community impact statement

- 52. The Council is still in the process of identifying and analysing the potential equalities impacts of this proposed policy. No significant concerns were raised through the consultation (as covered in Appendix C). There is very limited data in relation to protected characteristics for people from the key priority groups. Many of the likely recipients of this housing are likely to be from the private rented sector where there is again very little data. Therefore it will be important to ensure this is closely monitored once the scheme is implemented to help assess if the policy is having any unintended impact on any particular protected characteristic. This will require ongoing monitoring of those joining the list, and at the letting stage.
- 53. The intermediate rent housing policy prioritises certain groups of residents' access to reduced-cost rented housing in Southwark. This could have the effect of indirectly discriminating against other residents with protected characteristics under the Equality Act 2010. This could apply to women and disabled people, who may be less likely to be in work. Following the

equalities impact assessment the Council has concluded that any potential impact on persons with protected characteristics under the Equality Act 2010 is justified as a proportionate means of achieving a legitimate aim, namely addressing identified issues with recruitment and retention of frontline key workers in the borough. This will be reviewed further after the list has been in operation for one year to ensure compliance with the duties under the Act. Care will be taken to ensure that monitoring is carried out in a way which respects the principles of the Data Protection Act 2018 and the Human Rights Act 1988.

#### **Resource Implications**

#### Financial issues

- 54. To introduce and administer the new intermediate rent housing list, the Council will need to procure an intermediate rent housing list portal, enabling those eligible to register an interest. In addition to the portal, there will be an increased cost for the Council in staff time providing advice, administering the system, and monitoring details on allocations. These costs will be minimised through embedding this work into the existing Housing Solutions Service as far as possible and requiring the landlord to do the data validation, allocations, viewings and tenancy sign ups.
- 55. There may also be legal challenges to the priority banding used, although this is more likely to apply for properties where the Council is the landlord.
- 56. At this stage, the portal costs are still being established and with limited properties available for immediate rent, the staffing need will be monitored closely, however, it is expected to be contained within existing resources.

#### Staffing issues

57. There will likely be a need for a Housing Solutions officer to take on responsibility for coordinating the initial setting up of the scheme once agreed and for monitoring how the list is working, and resolving potential teething issues. There will also be some work required to add property details to the portal and provide advice on how to register interest in properties. There is likely to be peaks and troughs in the work administering the intermediate rent housing list, particularly as new schemes come forward. This will need to be monitored closely and the resource requirements will need to be kept under review.

#### Legal implications

58. Please see the comments of the Director of Law and Governance below.

#### Consultation

59. The Council consulted on the intermediate rent housing list from 25th July 2018 to the 18th November 2018. The main method of consultation was the

web-based consultation document. The internet, press releases and social media were used to try to raise awareness of the consultation. Officers also wrote to developers and key worker organisations to encourage their feedback. Officers also met directly with existing groups such as the Southwark Housing Association Group (SOUHAG), the Futures Steering Board (FSB), Tenant Council, Homeowner Council and TMO Liaison Committee. Announcements were also made at Community Councils and this consultation was included in Community Council newsletters/Facebook pages etc. The Council also met with officers from the GLA.

- 60. There were 90 responses to the actual consultation survey online and five emails with comments. Overall there was a good spread of responses from different tenures, ages, ethnicities, sexualities, religions and disabilities. Male respondents were under represented.
- 61. Broadly the consultation supported the proposals put forward in the consultation but there were a number of very helpful suggestions for slight changes. A summary of the consultation was included in the July 2019 Cabinet Report and this also explained how the consultation feedback impacted on the plans for the intermediate rent housing list.

## SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

#### Director of Law and Governance

#### Intermediate rent homes offered by third parties

- 62. Section 106 of the Town and Country Planning Act 1990 (as amended) (TCPA) allows a local planning authority to impose restrictions on the development or use of land or to require land to be used in a specific way. The delivery of affordable housing is one such use of land, which is commonly secured through the use of agreements between the local planning authority and the developer. Such agreements are enforceable by the local planning authority against the person who first enters into the agreement, and any person deriving title to the land from that person, pursuant to s.106 (3) TCPA. Intermediate rented housing may be secured through such agreements in the same way as other forms of affordable housing.
- 63. The TCPA does not restrict the terms which may be imposed by the planning authority on eligibility for affordable housing or the terms on which it may be offered: this is a matter which falls to be determined by application of the local authority's housing policies. In relation to housing offered by private landlords, the authority has discretion to set eligibility and allocation criteria in accordance with those policies; to select applicants who satisfy those criteria; and to nominate those individuals to the developer as tenants.
- 64. However this is not the case in relation to housing offered by private

registered providers (PRPs). Section 159 of the Housing Act 1996 states that a local housing authority "allocates" housing accommodation when it "nominates" a person to be an assured tenant of a PRP: under s.159(4) this includes requiring that housing accommodation be made available to one of a number of persons put forward by the authority. When this applies, the local housing authority must apply the social housing allocation scheme operated under s.166A(1) of that Act in allocating the housing accommodation, and not any other scheme (such as the proposed "intermediate rent" waiting list to be established by the Council).

- 65. The report proposes that the PRP will be entitled to make contact with prospective tenants who have registered an interest with the PRP, whether or not they are registered with the Council's list, but the PRP must apply the authority's eligibility and priority criteria when making decisions on allocation. This avoids the 'nomination' issue as the authority is not putting forward a group of individuals, one of whom mujst be selected to be tenant(s) of the PRP.
- The scheme will prioritise certain groups of residents' access to reduced-66. cost rented housing in Southwark. An equalities impact assessment has been carried out, and the effect on persons with protected characteristics under the Equality Act 2010 analysed. The report confirms that the scheme could have a discriminatory impact on groups of residents with protected characteristics who may as a result be less able to work, including for example women and disabled people. The report concludes that the potential impact on these groups is justified as a proportionate means of achieving a legitimate aim, namely helping to assuage identified recruitment and retention issues in frontline keyworker roles. Further, officers propose that the position is reviewed every two years. This will be important for the Council to be able to demonstrate compliance with its duties under the Act, but care must be taken to ensure that monitoring is carried out in a way which respects the principles of the Data Protection Act 2018 and the Human Rights Act 1988.

Intermediate rent homes offered by the Council

- 67. The report suggests that the Council may decide to offer intermediate rent homes directly in the future, though this will be the subject of a further report if it is to be progressed. This will raise a number of specific legal issues which will need to be considered and addressed in that further report. These include:
  - Form of tenancy: a long term secure tenancy may not be appropriate and the Council may wish to consider offering time-limited secure tenancies under s107A Housing Act1985;
  - Allocation: as noted in the report, a local lettings scheme would be required under s.166A(6) Housing Act 1996;
  - Rent setting: as the report notes, at present the Council is permitted by

the 2020 Rent Standard, only to offer intermediate rent homes to key workers; and

• Consultation: the potential for direct delivery of intermediate rent homes has been consulted upon in the context of the Council's refreshed housing strategy. Consultation would be required with local residents before each local lettings scheme was implemented.

#### Strategic Director of Finance and Governance (H&M 20/155)

68. The Strategic Director of Finance and Governance notes the recommendations and the potential costs associated with implementing and administering the intermediate rent housing list. At this stage, the full cost is not known but expected to be contained within the Housing Revenue Account.

#### BACKGROUND DOCUMENTS

Background Papers	Held At	Contact		
July 2019 Cabinet Report - Intermediate rent housing list - feedback on the consultation and agreeing the next steps	Housing and Modernisation 160 Tooley Street, London, SE1 2QH	Robert Weallans 020 7525 1217		
Link: http://moderngov.southwark.gov.uk/ieDecisionDetails.aspx?AlId=54064				

#### APPENDICES

Appendix	Title		
Appendix A	Southwark Intermediate Rent Policy – March 2021		
Appendix B	The evidence of recruitment and retention issues for keyworkers		
Appendix C	Intermediate rent housing list equalities impact assessment		

## AUDIT TRAIL

Cabinet Member	Councillor Steph Housing	anie Cryan, Cabinet	Member for Council	
Lead Officer	Michael Scorer, Modernisation	Strategic Director	of Housing and	
Report Author	Robert Weallans, Housing Strategy Manager			
Version	Final			
Dated	10 March 2021			
Key Decision?	Yes			
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER				
Officer Title		Comments Sought	Comments Included	
Director of Law and Governance		Yes	Yes	
Strategic Director of Finance and Governance		Yes	Yes	
Cabinet Member		Yes	Yes	
Date final report sent to Constitutional		ional Team	10 March 2021	