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# GENERAL PUBLIC SERVICES AND ECONOMIC DEVELOPMENT COMMITTEE

Tuesday, 16 January 2024 at 7.30 pm

## SUPPLEMENTARY PAPERS

The following papers have been added to the agenda of the above meeting. They were not available when the agenda was originally published.

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*Joanne Wagstaffe, Chief Executive  
10 January 2024*

11. **HOUSING, HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2023-2028 - FINAL DRAFT** (Pages 3 - 78)

To consider a report by the Strategic Housing Manager reviewing the Council's Housing, Homelessness and Rough Sleeping Strategy 2017-2022 and, following public consultation, the final draft of the Council's proposed Housing, Homelessness and Rough Sleeping Strategy 2023-2028.

**General Enquiries: Please contact the Committee Team at**  
[committeeteam@threerivers.gov.uk](mailto:committeeteam@threerivers.gov.uk)

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**Joint Leadership Team  
Monday 8 January 2024**

PART I

**Housing, Homelessness and Rough Sleeping Strategy 2023-2028 - Final Draft  
(ADSPH)**

**1 Summary**

- 1.1 To provide JLT with a review of the Council's Housing, Homelessness and Rough Sleeping Strategy 2017-2022 and a final draft of the Council's proposed Housing, Homelessness and Rough Sleeping Strategy 2023-2028, post public consultation.
- 1.2 The final draft of the Council's Housing, Homelessness and Rough Sleeping Strategy 2023-2028 can be found in Appendix One. The review of the Council's Housing, Homelessness and Rough Sleeping Strategy 2017-2022 can be found in Appendix Two. The action plan linked to the Housing, Homelessness and Rough Sleeping Strategy 2023-2028 can be found in Appendix Three.

**2 Details**

- 2.1 The Council is statutorily required to produce a Housing, Homelessness and Rough Sleeping Strategy.
- 2.2 The Council's previous Housing, Homelessness and Rough Sleeping Strategy, adopted in 2017, expired at the end of 2022. Therefore, following a review of this strategy, a new strategy for 2023-2028 has been produced.
- 2.3 The Housing, Homelessness and Rough Sleeping Strategy 2023-2028 links to the Council's Corporate Framework 2023-2026, which sets out the Council's vision to make Three Rivers 'a great place to live, work and visit'.
- 2.4 The strategy supports this vision by ensuring that Three Rivers is a district where people have access to good quality housing and where our most vulnerable residents are supported.
- 2.5 The strategy outlines three key objectives for the Council in the area of Housing, over the period of the next five years, these are as follows -
  - 2.5.1 To prevent and relieve homelessness.
  - 2.5.2 Support our most vulnerable customers into permanent, suitable and sustainable accommodation.
  - 2.5.3 To improve the standard of housing across the district.
- 2.6 To ensure the delivery of these objectives, an action plan (Appendix Three) has been developed to run alongside the strategy.
- 2.7 Housing is a dynamic environment; therefore, this action plan will be a live document that will enable Officers to react quickly to any changing priorities or significant legislative reform.

- 2.8 The action plan will be reviewed annually, with reports of our progress against the plan provided to the relevant Committee.
- 2.9 Following agreement at Policy and Resources Committee on 13 November 2023, a public consultation on the proposed Housing, Homelessness and Rough Sleeping Strategy 2023-2028 was launched.
- 2.10 Although a 4-week public consultation on the proposed strategy was all that was required, extra time was allocated to the consultation to account for the festive period. Therefore, the consultation opened on 24 November 2023 and closed on 1 January 2024
- 2.11 The consultation was administered by the Council's Communications team using the 'haveyoursay' platform.
- 2.12 A Communications Strategy for the public consultation was developed that included the consultation being promoted on the Council's website and our various social media channels. A press release was drafted to release to the public when the consultation opened, and an additional budget was provided by Housing Services to boost the promotion of the strategy on our social media channels.
- 2.13 The consultation received 43 visits to the consultation page and 13 contributions.
- 2.14 The first part of the consultation focused on the proposed vision outlined within the draft strategy, to make Three Rivers a district where our residents feel supported, by ensuring that –
- 2.14.1 Three Rivers is a district where people have access to good quality housing.
- 2.14.2 Three Rivers is a district where the most vulnerable residents, including those who are victims of domestic abuse, are supported.
- 2.14.3 Three Rivers is a district where people who are homeless, or at risk of homelessness, can access permanent and suitable accommodation.
- 2.14.4 Three Rivers is a district where rough sleeping, or the risk of rough sleeping, is eliminated.
- 2.15 All 13 contributors to the consultation confirmed that they either 'strongly agreed' or 'tend to agree' with the four points above, therefore, we have not made any amendments to our vision post consultation.
- 2.16 The second part of the consultation focused on our three proposed objectives, as listed in 2.5. The results were as follows –
- 2.16.1 To prevent and relieve homelessness – 13 x Strongly Agree or Tend to Agree.
- 2.16.2 Support our most vulnerable customers into permanent, suitable, and sustainable accommodation. – 13 x Strongly Agree or Tend to Agree.
- 2.16.3 To improve the standard of housing across the district. - 13 x Strongly Agree or Tend to Agree.
- 2.16.4 Our proposed objectives received full support in our consultation, therefore, we have not made any amendments to these objectives post consultation.

- 2.17 The third part of the consultation focused on the actions contained in our proposed action plan.
- 2.18 The action plan is set out in three sections, each of which is attached to one of our proposed objectives.
- 2.18.1 All 13 contributors to the consultation confirmed that they either 'strongly agreed' or 'tend to agree' (or stated don't know or not applicable) with the following actions in the action plan –
- Ensure the flexible use of the Council's Homelessness Prevention Fund
  - All tenants of our registered providers threatened with eviction are prevented from homelessness wherever possible.
  - Ensure staff are aware of new trends which will predict our busier periods to enable them to prepare sufficiently.
  - Better understanding of rough sleeping in the district.
  - Promotion of homelessness prevention services.
  - All customers to be referred to any support services they require.
  - Correct and up to date information is always available to customers.
  - New Hope to provide the Council's Sever Weather Emergency Protocol (SWEP) provision.
  - The Council's Housing Allocations Policy to remain up to date with legislative updates.
  - Revamp of the current Rent Deposit Guarantee Scheme (RDGS).
  - Increase the level of mediation work and home visits to households.
  - Efficient use of the Council's Next Steps Accommodation Programme (NSAP) properties
  - Efficient use of the Council's Rough Sleeper Accommodation Programme (RSAP) properties.
  - Vulnerable customers housed in the Council's temporary accommodation to be provided support.
  - A single homeless pathway for adults with complex needs, who are homeless or at risk of homelessness, to be established in Three Rivers.
  - Maximise funding opportunities.
  - RSI-6 funding granted by DLUHC to continue to provide a Housing Navigator post within Housing Services.
  - Support victims of domestic abuse.
  - Oversee the integration of a Domestic Abuse Caseworker within the Housing Service.

- Improve awareness of conditions in the private housing sector.
  - Improve standards in the private rented sector.
  - Clear guidance for discharging our homeless duties into the private rented sector.
  - Establish a protocol for dealing with complaints of housing disrepair, specifically those relating to damp and mould.
  - Adoption of a Housing Enforcement Policy.
  - Ensure we are fully prepared for when the Renters (Reform) Bill becomes an Act of Parliament.
  - Encourage our Registered Providers and developers to build net zero homes, promote sustainable living and make space for nature within any development in the district.
  - Ensure that Private Rented Sector (PRS) landlords within the district are aware and fully informed of the funding opportunities available to them to make significant improvements to the standard of their properties.
- 2.19 Only six actions in the proposed action plan did not receive full support from our contributors, with one or two contributors disagreeing with the proposed actions as follows –
- 2.19.1 Implement a cost-of-living homelessness prevention project.
- 2.19.2 Work in partnership with Planning Policy and Regulatory Services to ensure the ongoing delivery of affordable housing in the District.
- 2.19.3 Review the target for housing and the affordable housing provision within this plan, following the adoption of the new Local Plan.
- 2.19.4 Further allocation of Accommodation for Ex-Offenders (AeFO) funding awarded.
- 2.19.5 Enable people to remain in their homes and ensure they are appropriate for their needs.
- 2.19.6 Establish a Houses in Multiple Occupation (HMO) monitoring programme.
- 2.20 Although the above six actions in our action plan did not receive full support from our contributors, it is clear that the vast majority of our contributors strongly agreed, or tended to agree with these actions, therefore, we have not made any amendments to these actions.
- 2.21 There was a small number of comments made by the contributors on the strategy and these have been considered.
- 2.22 Following these comments and comments from Members at the Policy and Resources Committee on 13 November 2023, the following changes have been made in the final version of the strategy –
- 2.22.1 The simplification of some language and/or acronyms used.

- 2.22.2 An additional action has been added to the action plan under Objective 2. Action 2.10 will ensure the Council's Housing Solutions Manager will undertake ongoing professional development in the form of regular training on the Council's responsibilities as signatories of the Armed Forces Covenant. This will ensure that the Council is aware of any updates to our responsibilities to this cohort at an early stage and can fulfil these as required.

### **3 Options and Reasons for Recommendations**

- 3.1 It is recommended that JLT agree the final Housing, Homelessness and Rough Sleeping Strategy 2023-2028 in order for progression to the Policy and Resources Committee.
- 3.2 The adoption of a Housing, Homelessness and Rough Sleeping Strategy will ensure that the Council remains compliant with our statutory obligations.

### **4 Policy/Budget Reference and Implications**

- 4.1 The recommendations in this report are within the Council's agreed policy and budgets.
- 4.2 The recommendations in this report relate to the achievement of the following performance indicators. -
- 4.2.1 HN01 – Maximum number of households living in temporary accommodation on the last day of the quarter.
- 4.2.2 HN03 – Maximum number of households in temporary accommodation throughout the year.
- 4.2.3 HN06 – Promote access to the private sector lettings in order to prevent and relieve homelessness.
- 4.2.4 HN11 – Percentage of households prevented or relieved from homelessness.
- 4.3 The impact of the recommendations on this/these performance indicator(s) is:

The Housing, Homelessness and Rough Sleeping Strategy 2023-2028 will ensure that the Council continue to attempt to reduce the number of households in temporary accommodation and ensure we are taking action to consistently prevent or relieve the homelessness of our customers.

The Housing, Homelessness and Rough Sleeping Strategy 2023-2028 details the importance of increasing the Council's access to the private rented stock available within the district.

**Financial, Legal, Equal Opportunities, Staffing, Environmental, Community Safety, Public Health, Customer Services Centre, Communications & Website, Risk Management and Health & Safety Implications**

### **5 Financial Implications**

- 5.1 The action plan that has been produced as part of the Council's Housing, Homelessness and Rough Sleeping Strategy 2023-2028 contains several actions to be implemented. Specific actions on this plan have been included to address the expensive cost of temporary accommodation.

**6 Equal Opportunities Implications**

6.1 An Equal Opportunities Impact Assessment has been completed and is attached as an Appendix to this report.

**7 Environmental Implications**

7.1 The Strategy aims to encourage developers and Registered Providers to increase the delivery of net zero homes, to promote sustainable living and make space for nature within any proposed development.

7.2 The Strategy will ensure that private sector landlords within the district are aware and fully informed of the funding opportunities available to them to make significant improvements to the standard of their homes.

7.3 An Environmental Impact Assessment has been completed and is attached as an appendix to this report.

**8 Public Health implications**

8.1 The Strategy will contribute to the prevention of deterioration of health and wellbeing issues that can be attributed to poor housing condition by improving the overall standard of housing across the district.

**9 Communications and Website Implications**

9.1 Communications will be utilised to promote the adoption of the Policy at the appropriate time. Once adopted, the new strategy will be uploaded to the Council's website and a press release will be drafted.

**10 Customer Service Centre, Community Safety, Staffing, Legal Implications**

10.1 None specific.

**11 Risk and Health & Safety Implications**

11.1 The Council has agreed its risk management strategy which can be found on the website at <http://www.threerivers.gov.uk>. In addition, the risks of the proposals in the report have also been assessed against the Council's duties under Health and Safety legislation relating to employees, visitors and persons affected by our operations. The risk management implications of this report are detailed below.

11.2 The subject of this report is covered by the Housing Services service plan. Any risks resulting from this report will be included in the risk register and, if necessary, managed within this/these plan(s).

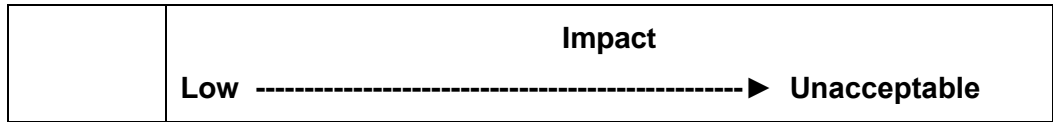
<b>Nature of Risk</b>	<b>Consequence</b>	<b>Suggested Control Measures</b>	<b>Response</b> <i>(tolerate, treat, terminate, transfer)</i>	<b>Risk Rating</b> <i>(combination of likelihood and impact)</i>
The Council fails to adopt a Housing, Homelessness	The Council would not be meeting its statutory	Committee to approve the final Strategy.	Tolerate	2



s and Rough Sleeping Strategy	obligation.			
A significant increase in the use of non-Council owned temporary accommodation	An increase in the budget required for temporary accommodation costs.	Mitigating actions contained within the Strategy's action plan.  Committee to approve the final Strategy	Treat	6

11.3 The above risks are scored using the matrix below. The Council has determined its aversion to risk and is prepared to tolerate risks where the combination of impact and likelihood scores 6 or less.

<b>Very Likely</b> Remote Likelihood ↓	<b>Low</b> 4	<b>High</b> 8	<b>Very High</b> 12	<b>Very High</b> 16
	<b>Low</b> 3	<b>Medium</b> 6	<b>High</b> 9	<b>Very High</b> 12
	<b>Low</b> 2	<b>Low</b> 4	<b>Medium</b> 6	<b>High</b> 8
	<b>Low</b> 1	<b>Low</b> 2	<b>Low</b> 3	<b>Low</b> 4



**Impact Score**

4 (Catastrophic)

3 (Critical)

2 (Significant)

1 (Marginal)

**Likelihood Score**

4 (Very Likely (≥80%))

3 (Likely (21-79%))

2 (Unlikely (6-20%))

1 (Remote (≤5%))

11.4 In the officers' opinion none of the new risks above, were they to come about, would seriously prejudice the achievement of the Strategic Plan and are therefore operational risks. The effectiveness of the management of operational risks is reviewed by the Audit Committee annually.

**12 Recommendation**

12.1 **That:**

JLT approve the final draft of the Council's Housing, Homelessness and Rough Sleeping Strategy 2023-2028 for progression to Committee.

Report prepared by: Jason Hagland, Strategic Housing Manager,  
jason.hagland@threeivers.gov.uk

### **Data Quality**

Data sources: 'haveyoursay' Platform

Data checked by: N/A

Data rating:

<b>1</b>	<b>Poor</b>	<b>N/A</b>
<b>2</b>	<b>Sufficient</b>	<b>X</b>
<b>3</b>	<b>High</b>	<b>N/A</b>

### **Background Papers**

None

### **APPENDICES / ATTACHMENTS**

**Appendix One - The Housing, Homelessness and Rough Sleeping Strategy 2023-2028**

**Appendix Two - The Housing, Homelessness and Rough Sleeping Strategy 2017-2022 Review**

**Appendix Three - The Housing, Homelessness and Rough Sleeping Strategy 2023-2028 Action Plan**

**Appendix Four – Equalities Opportunities Impact Assessment**

**Appendix Five – Environmental Impact Assessment**

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# Housing, Homelessness & Rough Sleeping Strategy 2023-2028

*Three Rivers  
'tackling  
homelessness'*



**HOMELESSNESS**



**AFFORDABLE  
HOUSING**

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# Introduction



## This strategy supports the council's vision

Our Housing, Homelessness and Rough Sleeping Strategy 2023-2028, developed through consultation with partners, stakeholders and residents, presents the key objectives relating to the delivery of housing and housing-related services in the district over the next five years.

This strategy links to the Council's Corporate Framework 2023-2026, which sets out the council's vision to make Three Rivers **"a great place to live, work and visit"**.

This strategy supports the council's vision by ensuring that Three Rivers is a district where people have access to good quality housing and where our most vulnerable residents are supported.

The development of this strategy has been considered in conjunction with the context and priorities expressed through other key strategies. This includes the relationship to the Community Strategy, Strategic Plan, Local Development Framework (LDF), Strategic Housing Market Assessment (SHMA), the Council's Local Investment Plan, and other key housing documents such as the Tenancy Strategy and Housing Allocations Policy.

As a non-stock holding authority, we deliver homes and housing services with the support of a range of partners. This strategy provides a framework for everyone involved in Three Rivers housing; registered providers, charities, private developers, investors, regulators, private landlords, neighbouring local authorities, and, of course, our residents and local councillors.

This strategy does not stand alone. Its aims and objectives are interrelated with a wide range of plans and strategies led by the council and its external partners. Delivery of the strategy's objectives will require contributions from a range of agencies and organisations. To make the best use of resources and to learn from best practice we will continually build on and develop relationships with our partners.

# Foreword



## **Housing** plays an important part in wellbeing

As the Lead Member for Housing, I understand the importance that housing plays in the wellbeing of our residents. Ensuring there is a range of housing types is important for individuals and families across the district, from supported housing and affordable rentals to starter homes and larger family homes. It also builds strong neighbourhoods and inclusive communities and supports the economic prosperity of the district.

This strategy has been developed in partnership with our key stakeholders including registered providers, landlords, local residents, as well as our elected councillors. It follows the theme of the Council's Corporate Framework in which the vision for the council is that the district should be a great place to live, work and visit.

During the last few years, we have seen more households struggling during the Covid-19 Pandemic and following on from this, the increase in the cost-of-living crisis with rising food prices and high energy bills. We have seen house prices and rents rise, leaving more households needing help to access housing and, sadly, increasing numbers of homeless people including families suffering from the effects of war in Ukraine.

The strategy articulates the priorities for tackling the challenges we have identified in the years ahead and demonstrates our collective approach to housing across the district with the council as the lead, working in partnership with registered providers, developers, private landlords and residents.

Whilst we face challenges ahead, I am confident that we can build on our excellent partnerships and work with stakeholders to utilise their experience and achieve better housing choices and outcomes for our residents.

*Councillor Andrew Scarth  
Lead Member for Housing,  
Public Health & Wellbeing*



# About Three Rivers

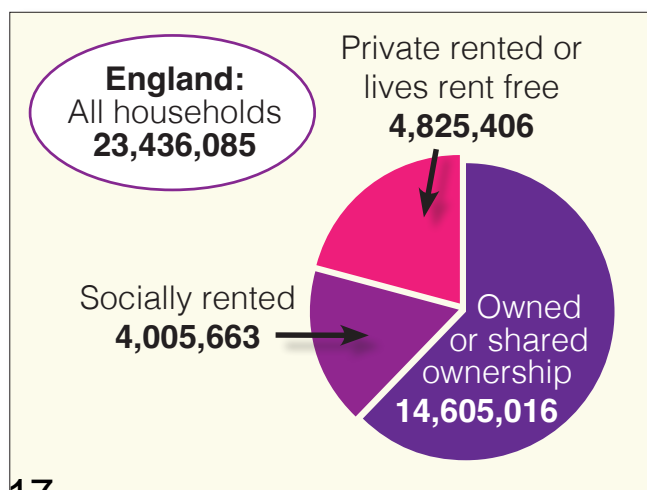
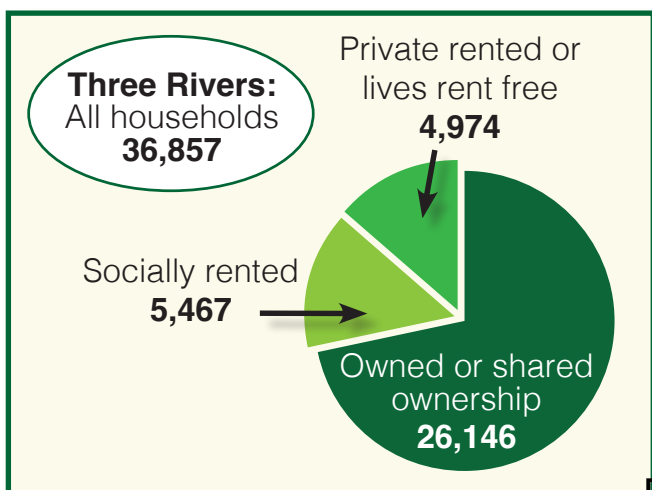
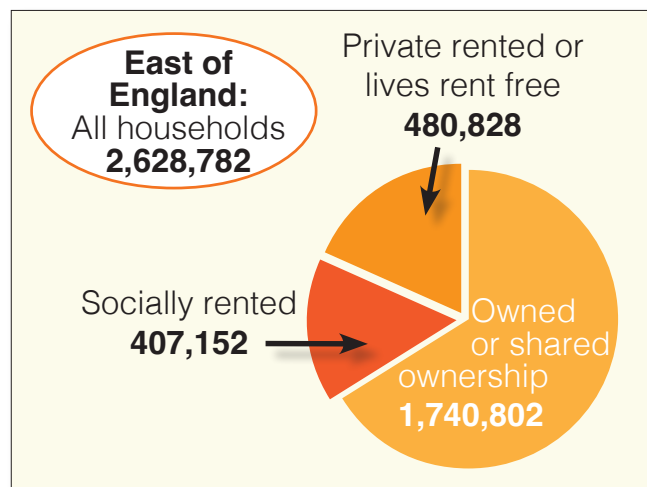


## Local population within the country

The population of Three Rivers in 2011 was 87,300 and has increased by 7.4% to 93,800 in 2021. This is higher than the overall increase for England (6.6%).

According to the 2021 Census, the tenure split of the district compared to the East of England and England as a whole, can be seen in the graphics provided on this page.

Levels of home ownership in the district are slightly higher than the regional and national rates, whilst private renting is lower than both the regional and national rates. This is likely to be a result of the district being generally quite affluent and may reflect the high price of rental costs, forcing those on a lower income to look beyond Three Rivers to source affordable housing.

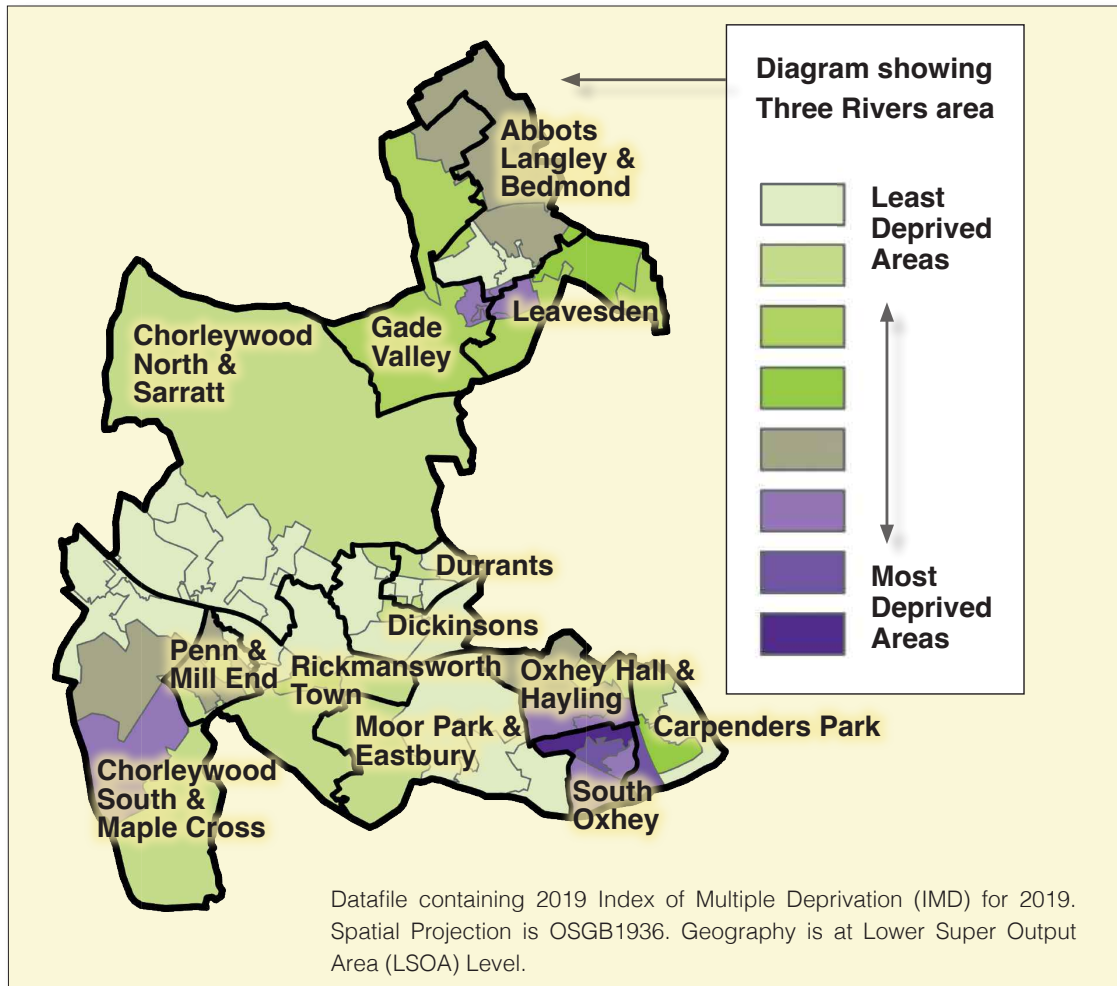


# About Three Rivers



## Local demographic of Three Rivers.

The 2019 Index of Multiple Deprivation (IMD) scores within Three Rivers are extremely polarising, reflecting an overall affluent district with some significant pockets of deprivation as shown in the image below.



# About Three Rivers



## **Local demographic** of Three Rivers

Residents in the most deprived areas of the district are more likely to be renting, this includes those tenants in social housing provided by our registered providers. As expected, residents in the least deprived areas of the district are far more likely to be property owners.

Data indicates that residents in South Oxhey are likely to have fewer education and employment opportunities, experience greater barriers to accessing services and have lower household incomes than in other parts of the district.
























With private rented sector market rents significantly higher than Local Housing Allowance (LHA) and private landlords and estate agents increasingly reluctant to let properties to those residents who are benefit dependant or low-income households, residents in South Oxhey are more likely to require housing advice and assistance from the council, if threatened with homelessness from their current property.

# About Three Rivers



## Local Housing Allowance shortfalls

in different areas of the district and the district as a whole.

<b>Local Housing Allowance shortfall</b>	<b>£502</b>	<b>£653</b>	<b>£904</b>	<b>£1,612</b>
<b>South Oxhey<sup>1</sup></b>				
<b>Average rent</b>	<b>£1,300</b>	<b>£1,650</b>	<b>£2,200</b>	<b>£2,995</b>
<b>Local Housing Allowance shortfall</b>	<b>£552</b>	<b>£653</b>	<b>£1,154</b>	<b>£1,765</b>
<b>WD3 Postcode<sup>1</sup></b>				
<b>Average rent</b>	<b>£1,350</b>	<b>£1,650</b>	<b>£2,450</b>	<b>£3,148</b>
<b>Local Housing Allowance shortfall</b>	<b>£502</b>	<b>£503</b>	<b>£704</b>	
<b>WD5 Postcode<sup>1</sup></b>				
<b>Average rent</b>	<b>£1,300</b>	<b>£1,500</b>	<b>£2,000</b>	
<b>Local Housing Allowance shortfall</b>	<b>£402</b>	<b>£553</b>	<b>£854</b>	<b>£1,515</b>
<b>WD19 Postcode<sup>1</sup></b>				
<b>Average rent</b>	<b>£1,200</b>	<b>£1,550</b>	<b>£2,150</b>	<b>£2,898</b>
<b>Local Housing Allowance shortfall</b>	<b>£402</b>	<b>£478</b>	<b>£904</b>	<b>£1,017</b>
<b>Kings Langley<sup>1</sup></b>				
<b>Average rent</b>	<b>£1,200</b>	<b>£1,475</b>	<b>£2,200</b>	<b>£2,400</b>
<b>Local Housing Allowance shortfall</b>	<b>£252</b>	<b>£303</b>	<b>£354</b>	<b>£892</b>
<b>Three Rivers<sup>2</sup></b>				
<b>Average rent</b>	<b>£1,050</b>	<b>£1,300</b>	<b>£1,650</b>	<b>£2,275</b>

<sup>1</sup> Median rent charges taken from Home.co.uk as at 26 September 2023

<sup>2</sup> ONS median monthly rents recorded between 1 April 2022 – 31 March 2023

The image above provides the average rent and Local Housing Allowance (LHA) shortfalls.

Access to housing is a fundamental part of achieving a good quality of life in which stable

relationships, good health and education, and rewarding work can be achieved.

House and rental prices across the district are high and there is a growing and ageing population which presents further housing challenges.

# Homelessness in Three Rivers



## Review of homelessness

2017 - 2022

The background to this strategy is the Review of Homelessness 2017-2022 carried out in mid-2023. This review and its findings can be found in Appendix A.

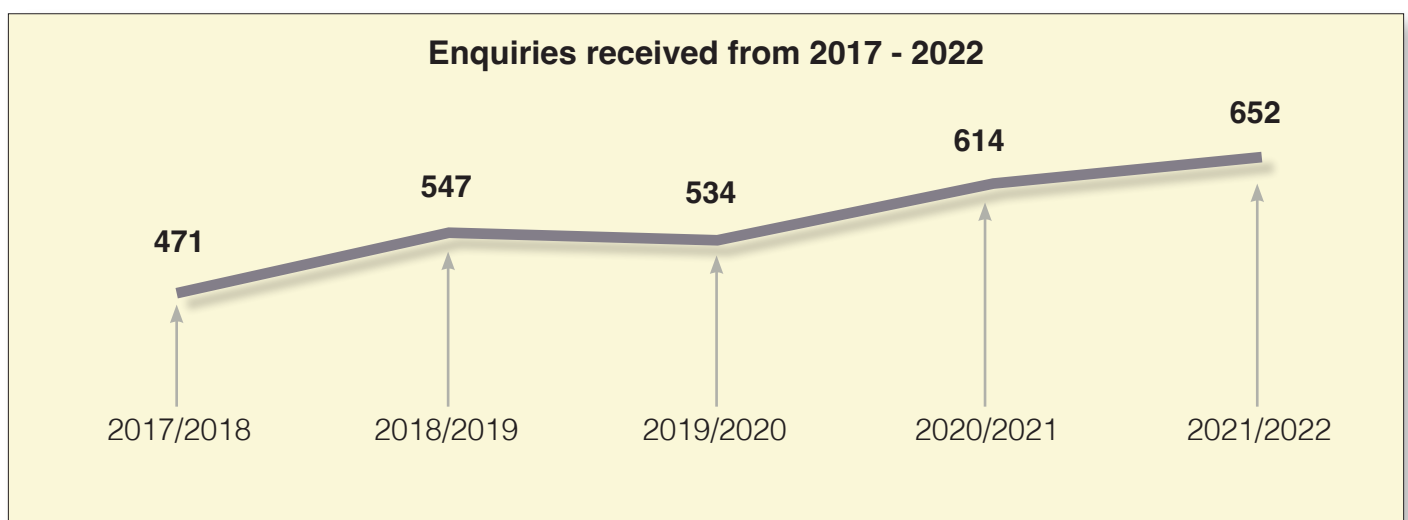
As per the graph below, overall demand on the Housing Service has increased by 50% since 2017.

Following the government's intervention during the Covid-19 pandemic and the council's response to these interventions, a significant increase in enquiries can be seen post 2019/20.

This increase has continued into the post pandemic period, which can likely be attributed to the pressure these interventions placed on families living in crowded households and the economic circumstances that have faced the country following the Covid-19 pandemic.

Although there is not a documented rough sleeping problem within the district, during the 'Everyone In' directive by central government, an underlying problem with those who are at risk of rough sleeping was identified within the district. These individuals are often only prevented from rough sleeping by 'sofa surfing' with friends and family members who are willing to accommodate them for short periods.

We acknowledge this underlying problem and have placed actions within our action plan to minimise the extent of this problem and support these individuals into long-term accommodation.





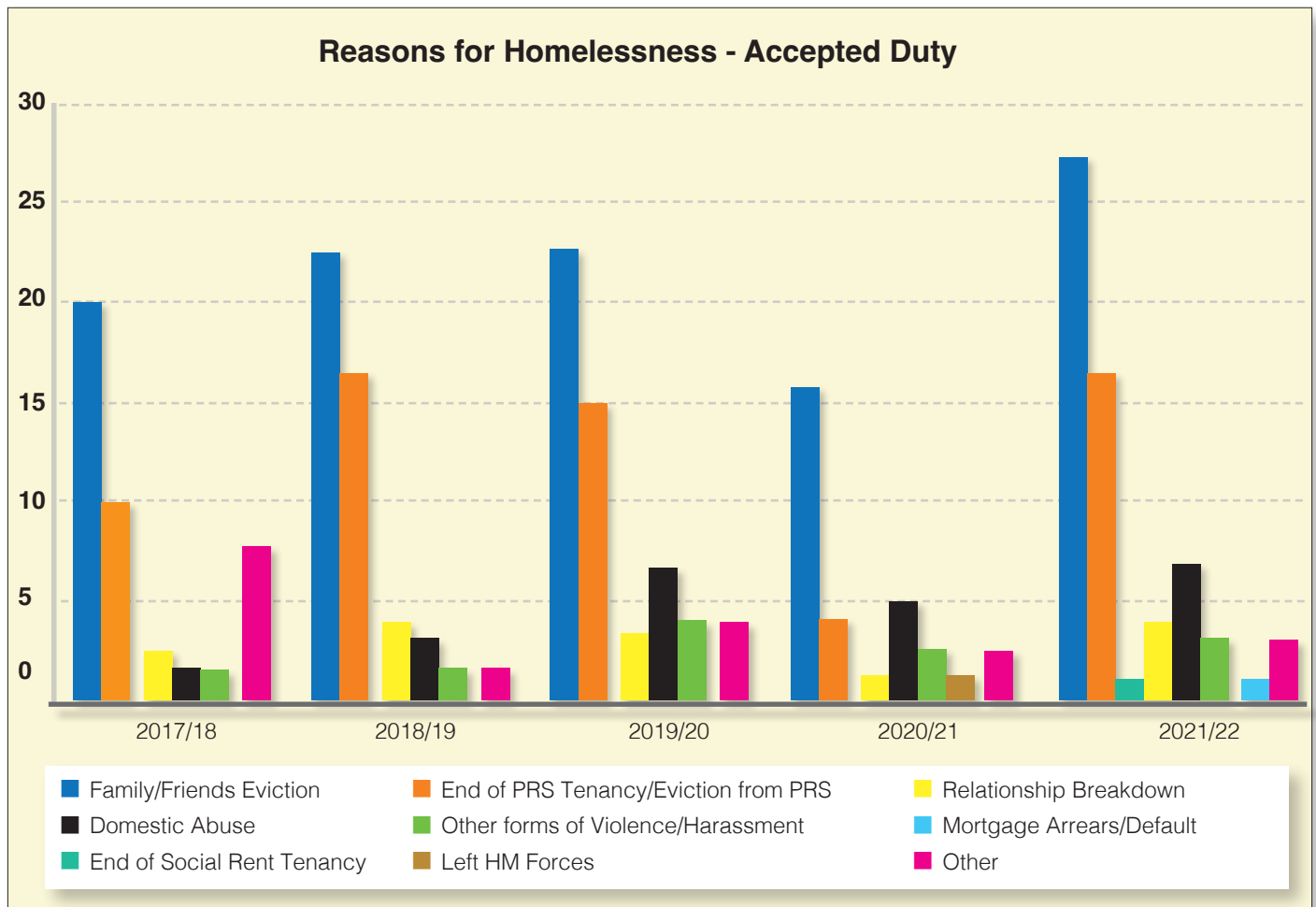
# Homelessness in Three Rivers



## Review of homelessness

2017 - 2022

Due to the worsening of the cost-of-living crisis during the intervening months between the completion of our review and the publishing of this document, we have seen a continuation of the rising number of homeless applicants approaching the council for housing advice and assistance.



# Homelessness in Three Rivers



## Review of homelessness

2017 - 2022

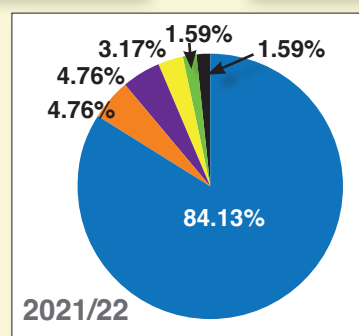
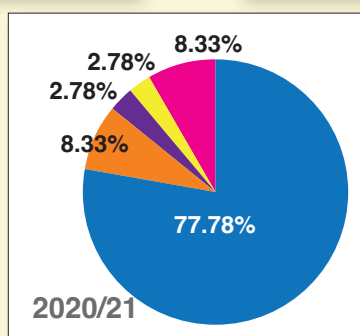
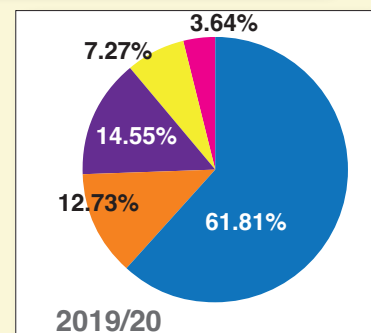
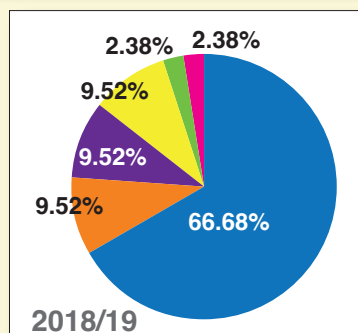
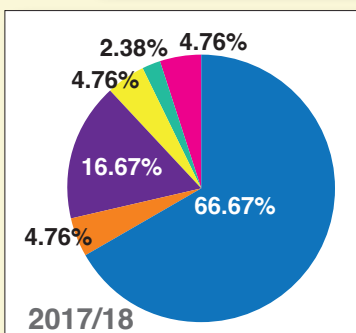
Data indicates that the primary reason for the council to accept the homelessness duty towards a household is due to an eviction by a family member (parents/extended family) or friend. This is followed closely by the eviction of a household from a property in the private rented sector.

In 2021/22, 41% of circumstances in which the council accepted a homelessness duty

towards a household, has been following an eviction from the parental (or family) home. We acknowledge that this represents a substantial majority of all acceptances in this period and, therefore, recognise that significant work to minimise this figure needs to be prioritised by the council.

### Reasons for Priority need

- Dependent Children
- Mental Disability/Mental Health
- 16/17 year olds
- Domestic Abuse
- Pregnant
- Physical Disability
- Emergency
- Other



# Homelessness in Three Rivers



## Review of homelessness

2017 - 2022

We aim to focus on early prevention work with these customers that are being evicted from parental accommodation and have included this within the action plan.

In 2021/22, 27% of circumstances in which the council accepted a homelessness duty towards a household, has been following an eviction from a privately rented property. Despite this already being the second highest reason for the acceptance of a homelessness duty towards a household, due to the ongoing cost-of-living crisis and the increasing rental costs in the district, the council expect this figure to increase considerably.

We recognise that increasing the access to the private rented sector within the district for our customers and residents remains a significant priority and have included this within our action plan.

During the last five years, the percentage of accepted cases that fall into the above categories has remained relatively steady, although years 2019/20 and 2021/22 saw a notable increase from 2019/20 of accepted cases granted a priority need due to the household containing dependent children.

The council accept that those households who have made a homelessness application that are subsequently determined to have a priority need and offered interim accommodation due to the household containing dependent children, is largely out of our control.

However, we are confident that the focus on increased prevention work within the Housing Service will reduce our need for these customers to be provided temporary accommodation in the first instance.

External trends indicate that the council should prepare for homelessness approaches from households that are likely to have a priority need due to other factors, which is highly likely to increase.

Whilst changing the legal definition of a victim of domestic abuse, the introduction of the Domestic Abuse Act 2021 has ensured that any victim of domestic abuse is granted an automatic priority need for interim accommodation, following a homelessness application to any local authority. Therefore, the council expect this number to rise substantially and has placed actions within this plan to provide ongoing support to these vulnerable individuals.



# Homelessness in Three Rivers



## Review of homelessness

2017 - 2022

The impact of the Covid-19 pandemic and the interventions taken by central government have had a lasting impact on the mental health of the general population. Therefore, the council need to be prepared to deal with an increase of customers engaging with our Housing Service that are significantly vulnerable due to the deterioration of their mental health. This will be further impacted by the ongoing difficulty for many people to access mental health support.

Ukrainian guests who arrived in our district as part of the Homes for Ukraine Scheme, will be seeking more permanent and long-term accommodation and the closure of the hotels that have been accommodating Afghan refugees will ensure that the council will have increasing contact with vulnerable refugees. The council will continue to work with their partners, including Hertfordshire County Council and the Refugee Council, to ensure these customers receive the required level of support.

# Our Vision



## Three Rivers:

A district where residents feel supported.

### We want Three Rivers to be a district . . .



. . . where people have access to good quality housing.

. . . where the most vulnerable residents, including those who are victims of domestic abuse, are supported.



. . . where people who are homeless, or at risk of homelessness, can access permanent and suitable accommodation.

. . . where rough sleeping, or the risk of rough sleeping, is eliminated.



# Our Objectives



To realise our vision, this strategy has **three** key objectives.



To prevent and relieve homelessness.

our  
three key  
objectives



Support our most vulnerable customers into permanent, suitable and sustainable accommodation.



Improve the standard of housing across the district.

# To prevent and relieve homelessness



## Working towards identifying further prevention opportunities

It is widely recognised that homelessness is not just a lack of housing. It never occurs in isolation and, almost without exception, is closely related to poor physical or mental health, unemployment, or poverty. It affects the most vulnerable within our communities and impacts public services beyond the council's housing team.

Since the introduction of the Homelessness Reduction Act 2017, we have achieved positive results for our customers and increased the prevention of homelessness significantly, as represented in the figures provided in this strategy. However, the council is aware that this essential work undertaken by officers needs to be built upon and that further prevention opportunities are required to be identified.

Although Three Rivers is a largely affluent district, our customers are not immune to the current cost-of-living crisis affecting the country and it is predicted that due to this cost-of-living crisis, approaches to the council for housing advice and assistance will increase.

We will continue to make the best use of the Homelessness Prevention Grant, provided by central government, and to ensure that Three Rivers District Council are preventing

homelessness of their customers in the first instance.

However, if that is not successful, we will ensure that we work with their customers to enable them to access affordable, suitable and sustainable accommodation to relieve their homelessness.

### What we aim to do



**Implement a cost-of-living homelessness prevention project in partnership with our registered providers and private landlords in the district**



**Housing Options Officers to visit every household that is at risk of eviction from family/friend's at an early stage to identify any prevention opportunities**



**Ensure the council is prepared for the introduction of the Renters (Reform) Bill**



# Support the most vulnerable



**Support** our most vulnerable customers into permanent, suitable and sustainable accommodation.

There are several reasons why the council may refer to a customer as especially vulnerable, these may include customers who are suffering a mental health illness or physical illness, customers who are victims of domestic abuse or customers who have fled war and persecution in foreign countries that have been granted asylum in the United Kingdom. This also may include customers who have experienced one or more of the above, and who are now suffering from alcohol or substance addiction, as a result of their experiences.

The lasting impact of the Covid-19 pandemic cannot be ignored. The measures taken throughout that period, the effect these have had on the mental health of the population and the now considerable waiting times for people to receive mental health treatment, are likely to have a significant impact on all services over the coming years.

The Centre for Mental Health estimates that 10 million people in the United Kingdom (8.5

million adults and 1.5 million children) will require mental health support as a direct impact of the pandemic, during the next three to five years.

The council also anticipate increasing engagement with vulnerable refugees who have fled their home country in recent times, including those who have travelled to the United Kingdom as part of the Homes for Ukraine Scheme, or those who have fled Afghanistan.

On occasion, due to the support needs they require, some vulnerable customers are not suitable for housing within general needs properties, nor are they able to maintain a tenancy in the private sector without significant support. Therefore, the council must make the best use of the available stock that it has and ensure that it is suitable for these customers. At the same time, it should utilise their partners in the care and support sector, to provide ongoing wrap-around.

# Support the most vulnerable



**Support** our most vulnerable customers into permanent, suitable, and sustainable accommodation.

Support for these individuals and support them into accommodation that is permanent, suitable, and sustainable, eliminating the chances of repeat homelessness.

## What we aim to do



Efficient use of the council's Next Steps (NSAP) and Rough Sleeper (RSAP) Accommodation Programme properties



Work in partnership with Hertfordshire County Council to establish the single homeless complex needs pathway



Maximise any potential funding opportunities available for this cohort



Oversee the integration of a Domestic Abuse Caseworker within the Housing Service, aiming to support victims of domestic abuse and ensure they are aware of all support available to them



Ensure vulnerable customers who are placed by the council in temporary accommodation are provided with support

# Improve the standard of housing

**We aim** to improve the standard of housing across the district.

We aim to improve the standard of existing homes in the district and tackle issues around access to private renting for their residents and customers. This will include encouraging the Registered Providers and developers to build net zero homes that promote sustainable living in the district. Also, to support landlords in the private rented sector, ensuring they are aware of the opportunities available to them to take advantage of the government funding available to bring their properties up to a safe, livable standard.

We are not a stock holding authority and have a low level of social housing available within the district; therefore, often rely on the private rented sector to provide safe and suitable accommodation for residents and those engaging with the Council's Housing Service.

This forced reliance in the private rented sector can be problematic, as the gap between the cost of rent locally compared to the Local Housing Allowance available to residents is significant.

Furthermore, economic pressure in the United Kingdom which has led to an extraordinary increase in mortgage rates for landlords has had a knock-on effect on rental prices in the district, with several landlords raising the rent to reflect the rise in their interest rate, or in some cases, exiting the sector completely, reducing the amount of privately rented properties available.

We aim to develop stronger partnerships with private landlords within the district to increase

access to properties for customers and to encourage landlords to ensure that any property for rent is of a safe and suitable standard. Our objective aims to ensure that the standard of housing, in all tenures, is improved across the district.



## What we aim to do



**Encourage registered providers and developers to build net zero homes, promote sustainable living and make space for nature within any development in the district**



**Draft and implement a new Housing Enforcement Policy**



**Revamp the Council Rent Deposit Guarantee Scheme to provide increased access to PRS properties for customers engaging with the Council's Housing Service**

# How will we deliver these objectives



**The strategy** has been developed to ensure the delivery of our objectives.

An action plan (contained in Appendix B) that is aligned with this strategy has been developed to ensure the delivery of the three current objectives.

Housing is a dynamic environment; therefore, we anticipate new challenges and issues to arise during the five years of this strategy. This may include legislative reform or a significant shift in priority for the country, as witnessed in 2022 with the launch of the Homes for Ukraine Scheme or the closure of hotels that were accommodating Afghan refugees.

To enable us to react quickly to any changing priorities or important legislative reform, this action plan will be a live document that officers will monitor over the period of the strategy to ensure that the objectives are being met in the appropriate timelines. The action plan will be flexible and enable us to change our objectives at any time, should it be required.

We will, however, continue to review our action plan annually and make any changes to our approach or policies in response to the changing environment over a long-term period.

An effective approach to homelessness and its prevention involves a partnership approach between the council and all other local statutory and voluntary agencies operating in this field. We intend to continue to utilise these partnerships to improve the housing opportunities of our customers, aim to grow these partnerships throughout the term of this strategy and foster new partnerships that will benefit our customers when the opportunity presents.



# *Three Rivers 'tackling homelessness'*



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Three Rivers District Council

# **Appendix A Review of Housing, Homelessness and Rough Sleeping Strategy 2017-2022**

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## Introduction

Three Rivers District Council (TRDC) has a statutory duty to produce an updated Housing, Homelessness and Rough Sleeping Strategy to take effect in 2023.

A review of the previous strategy for the period of 2017-2022 provides the evidence and forecasting on which the new strategy will be based. The primary objectives of this review are to;

- Understand the extent of homelessness and the primary reasons it occurs in our District.
- Assess how the Council performed against its previous strategy and identify any likely future trends.
- Identify the Council's and our partner's response to homelessness in the district to highlight any gaps and overlaps that may impact service efficiency.
- Improve the service in the prevention and relief of homelessness.

Since publishing the Council's Housing, Homelessness and Rough Sleeping Strategy 2017-22, there have been notable changes to the housing landscape across the country that have directly affected homelessness.

Rental prices in the district continue to be a significant barrier for our residents to access the private rented sector and according to the Office of National Statistics (ONS) Private Rental Market Statistics April 2021 – May 2022, TRDC are currently the highest of any local authority in the East of England (Equal with St Albans, Hertsmere, and Epping Forest).

Property purchase in the district continues to be difficult for many residents, with a particular barrier for first time buyers and those on low incomes.

Unsurprisingly, the impact of the COVID-19 pandemic had a significant impact on the resources of the Council's Housing Service and this impact and the response to the pandemic will be discussed in depth later in this review.

The Homelessness Reduction Act 2017 has transformed how local authorities respond to a homelessness application, with a significant focus on preventing and relieving a customer's homelessness. The impact of this legislation on the Council's Housing Options service will be discussed below.

Contained in the Council's Housing, Homelessness and Rough Sleeping Strategy 2017-2022 was an action plan that listed several actions that the Council would undertake over the period of the strategy, to deliver the objectives set out within the strategy. Each action contained in this plan has been reviewed below to assess how the Council has performed against the strategy and to assess if some actions are required to be carried forward to the Council's Housing, Homelessness and Rough Sleeping Strategy 2023-28 Action Plan.

## **Objective One – Prevent And Relieve Homelessness**

### **1.1 Ensure we are fully prepared for the implementation of the Homelessness Reduction Act 2017.**

After receiving Royal Assent on 27 April 2017, the Homelessness Reduction Act 2017 came into force on 3 April 2018. Resourcing and structure were fit for purpose for this date and continue to be. All staff were fully trained on new procedures and continue to receive ongoing training to ensure they are aware of any updates in legislation.

### **1.2 Ensure all Herts Authorities provide a consistent service to homeless customers.**

Processes to ensure the consistent treatment of customers across the County are agreed and in place across the ten district and borough councils of Hertfordshire and remain under review at all times. Partnership working between the authorities is highlighted by the Hertfordshire Heads of Housing meeting that is conducted bi-monthly.

### **1.3 Ensure partners are aware and prepared for the new responsibilities of the Duty to Refer.**

Awareness sessions regarding the Duty to Refer were delivered to all partners and consistent referral pathways have been finalised across Hertfordshire. Housing Options Officers monitor the Council's dedicated Duty to Refer inbox and offer feedback to partners regarding improvements in the referral process.

### **1.4 Ensure that the new computer system is easily accessible and full information is given to enable customers to apply for housing online.**

Minor software issues were encountered during the launch of the new software, however, these were quickly rectified. Home Connections continues to supply the Council's housing software and all homelessness applications and applications to the Council's Housing Register are received electronically. Any customers unable to complete an online application receive support to do so from staff members.

### **1.5 Ensure staff are aware of the trends which will predict our busier periods to enable them to prepare sufficiently.**

Trend monitoring that has been undertaken by the Council's Housing Development Officer has given the Service the ability to predict our busier periods. However, over the period of this strategy, there was significant intervention or changes in priority from the Government, most importantly the interventions related to the COVID-19 pandemic, that made the prediction of busier periods difficult. The emergence of the cost-of-living crisis post the COVID-19 pandemic means that trends are likely to significantly shift, therefore, this action will be carried forward to the Council's Housing, Homelessness and Rough Sleeping Strategy 2023-28 Action Plan.



## **1.6 Make sure rough sleepers are aware of their options and ensure there are no rough sleepers in Three Rivers**

Housing Services continue to operate a Homelessness Forum quarterly with partners across the district and County. COVID-19 Working with our partners within this forum produced a protocol for dealing with rough sleepers within the district.

Procedures have been adopted within the Housing Service that ensure that any report of a customer who is sleeping rough is responded to by Housing Options Officers. Officers will visit an area where a rough sleeper, or any sign of a rough sleeper, has been reported in an effort to speak to the individual and provide them with housing advice and assistance.

Following a successful bid for funding from the Government's Rough Sleeping Initiative fund, the Council have appointed a Housing Navigator, who is dedicated to working with single customers with complex needs, who have a housing need. This includes customers who are at risk of or have been, rough sleeping. This support includes tenancy management or supporting the customer into training or employment opportunities.

## **1.7 Better understanding of rough sleeping in the district.**

A mapping exercise is underway to identify any hotspots in the district. The Housing Development Officer will be undertaking additional training on the use of Geographic Information System (GIS) mapping to allow a more detailed analysis of any trends that may appear. Analysis of potential hotspots will continue, therefore, this action will be carried forward to the Council's Housing, Homelessness and Rough Sleeping Strategy 2023-28 Action Plan.

## **1.8 All tenants of Registered Providers (RP's) threatened with eviction are prevented from homelessness wherever possible.**

Over the last five-year period there has been a significant improvement in the communication that Housing Services has with RPs in our district regarding their tenants who are at risk of homelessness. This has increased the amount of early intervention work to prevent the homelessness of these customers. This can be highlighted with the utilisation of the Council's allocation of funding via the Rent Arrears Support Scheme.

The Council meets monthly with the largest RP in the district, Thrive Homes, to discuss ongoing issues with nominations, works on void properties and upcoming developments. Meetings are conducted with other RPs on an ad-hoc basis if any issues arise.

A protocol between the Council and RPs, for their tenants at risk of homelessness was not completed because of resources being redirected as part of the Council's response to the COVID-19 pandemic. Therefore, this action will be carried forward to the Council's Housing, Homelessness and Rough Sleeping Strategy 2023-28 Action Plan.

## **1.9 Achieve Gold Standard from the National Practitioner Support Service (NPSS).**

The NPSS was dissolved and so this form of accreditation was removed from use, therefore was not able to be achieved.

### **1.10 Plans are in place to deal with customers at an early stage.**

Adopted procedures ensure the Housing Service encourage homelessness applications at the point that the customer feels threatened with homelessness, rather than sticking to the strict 56-day period as stated within the legislation.

The Service works in partnership with the Council's Revenues and Benefits Department, who signpost customers to the Housing Service when they have received an application from a customer for a Discretionary Housing Payment (DHP). This enables the Service to work with customers who may be at threat of homelessness before any crisis.

Post the COVID-19 pandemic, the Service launched a Rent Arrears Support Scheme in partnership with RPs to identify any customer threatened with homelessness as a result of rent arrears and prevent these individuals from homelessness.

### **1.11 Housing Allocations Policy to incorporate recent government updates.**

The Council adopted a new Housing Allocations Policy in 2021 and updated this Policy in 2022, ensuring the Council's adherence to any legislative updates and updated guidance.

### **1.12 Raise awareness of homelessness with young people.**

Housing Services continue to allocate £7,000 annually to Herts Young Homeless (HYH) for provision of their youth homelessness services in the district. HYH have delivered their 'Home Truths' sessions on youth homelessness to multiple schools across the district, raising youth awareness of the realities of homelessness and the support available to people if they find themselves in this circumstance.

### **1.13 Herts Police know what to do if they come across someone homeless in the district.**

Training on housing and homelessness was delivered to Hertfordshire Police by the Head of Housing Services. Updates to the Police continue to be provided through the monthly Anti-Social Behaviour Action Group (ASBAG) meeting and the Homelessness Forum.

### **1.14 Follow guidance issued by the Government in its Rough Sleeping Strategy**

To ensure that wider homelessness issues are considered as part of the overall health and wellbeing agenda, two representatives from the Hertfordshire district and borough Councils sit on the Hertfordshire Health and Wellbeing Board who are tasked with the representation of all of the local authorities in Hertfordshire.



## **Objective Two – Increase The Supply Of Accommodation, Including Temporary Accommodation**

### **2.1. To ensure that sufficient temporary accommodation is provided by the Council.**

Significant investment from the Council into its own supply of temporary accommodation has resulted in three developments being completed between 2019-2020, resulting in the availability of an additional 29 units.

The development in Rickmansworth Town Centre which provides 17 one-bedroom properties, was completed, and tenanted in September 2019. Two additional developments, both in South Oxhey and each comprising of six, two-bedroom flats, were completed and tenanted in December 2020.

### **2.2. Increase the supply in affordable housing in the district.**

Changes in UK Government policy and legislation caused a delay in the Council adopting a new Local Plan. As a result of this, Housing Services were unable to review the target for housing and the affordable housing provision within this plan. The Council expect to adopt a new Local Plan in 2025, therefore this review will take place following this and has been taken forward on the new Action Plan for the 2023-2028 Strategy.

### **2.3. Empty Homes to be brought back into use, increasing the supply of accommodation.**

Work was undertaken by Housing Services to identify and engage with the owners of empty homes in the district to encourage them to bring their properties back into use, however, this work was impacted due to a lack of resources as staff were redirected as part of the Council's response to the COVID-19 pandemic.

The Council continue to work with owners of empty homes to try to bring them back into use.

### **2.4. Encourage landlords to let their properties through the Council's Housing team.**

Following the appointment of a Private Housing Coordinator in early 2018, Housing Services have successfully increased the use of the private sector for homeless households in the district.

In 2017/18 the number of properties acquired for the Council's Rent Deposit Guarantee Scheme was 1, with 3 properties on the scheme re-let to homeless households.

In 2021/22 alone, the number of properties acquired for the Council's Rent Deposit Guarantee Scheme had increased to 13 properties and 5 properties on the scheme were re-let. In addition to this, Housing Services secured the let of 17 properties in the private rented sector for homeless households, outside of the Council's Rent Deposit Guarantee Scheme. This demonstrates a remarkable increase.

However, it is acknowledged, that due to the aftermath of the COVID-19 pandemic and the ongoing cost-of-living crisis, there has been a significant decrease in obtaining properties in the private sector for the use of homeless households in 2022. Therefore, Housing Services will complete a review of our current Rent Deposit

Guarantee Scheme that will be included in our new 2023-2028 action plan.

**2.5. Support at least one customer with complex needs into suitable accommodation.**

Following the response to the COVID-19 pandemic, the Department for Levelling Up, Housing and Communities (DLUHC) offered Local Authorities to complete funding applications to assist them in the housing of single adults with complex needs, who had been rough sleeping or at risk of rough sleeping.

In partnership with Watford Community Housing (WCH), Housing Services were successful in securing funding for the Next Steps Accommodation Programme (NSAP) and the Rough Sleeper Accommodation Programme (RSAP).

This funding enabled WCH to purchase ten self-contained properties in the district, for which the Council maintains full nomination rights, for the dedicated housing of customers in these circumstances. Using grant money, these properties were furnished and wrap around support provided by New Hope Trust.

The first five of these properties (NSAP) were tenanted in August 2021 and the following five properties (RSAP) were tenanted in November 2022.

**2.6. The Council prioritises customers who have the greatest need to be in or close to the district when offering temporary accommodation (TA)**

Housing Services published a Temporary Accommodation Placement Policy in December 2018. A subsequent review and update of this policy took place in June 2021. All offers of temporary accommodation made under relevant housing legislation are made with relevance to the parameters set out in this Policy that can be found on the Council's website.

## **Objective Three – Improve The Standard Of Housing Across The District**

### **3.1. Improve awareness of conditions in the private sector housing.**

The commission of a private sector housing stock condition survey across the district was postponed as result of resources being redirected as part of the Council's response to the COVID-19 pandemic. This will be carried forward and undertaken as part of the Council's Housing, Homelessness and Rough Sleeping Strategy 2023-2028 Action Plan.

### **3.2 To improve standards in the private rented sector.**

This action was dependent on the development of an action plan following action 3.1, therefore will be carried forward and undertaken as part of the Council's Housing, Homelessness and Rough Sleeping Strategy 2023-2028 Action Plan.

### **3.3 Work with landlords to ensure a ready supply of good quality private rented accommodation.**

Prior to the COVID-19 pandemic, Housing Services ran a bi-annual Three Rivers Landlords Forum in partnership with the National Residential Landlords Association (NRLA) (formally National Landlords Association). These forums were well attended and hosted speakers from a number of different organisations that would provide advice to landlords on multiple issues facing them, most importantly any updates or new legislation and obligations in relation to safety precautions in their properties. These forums were postponed throughout the pandemic, however, have recently restarted, with our first Three Rivers Landlords Forum post pandemic taking place in October 2022.

### **3.4 Ensure Houses in Multiple Occupation (HMO) fulfil legal requirements.**

At the time of this review, Housing Services licensed 15 HMOs located in the district. A public register of these properties is located on the Council's website. Officers in the Residential Environmental Health team are often required to provide advice for customers enquiring about the potential use of their property as a HMO and are tasked with investigating any report of unlicensed premises. Residents are encouraged to report any suspicion of a property operating as an unlicensed HMO in the district via the Council's website.

### **3.5 Ensure service is aware of and prepared for the change in regulations of HMOs.**

The Council website was updated by Officers to ensure that the requirements for the new HMO regulations were clear for all customers. All 15 properties licensed by the Council have been licensed in accordance with the latest legislation.

### **3.6 Clear guidance for discharging of homeless duties into the private rented sector.**

Housing Services published a Private Rented Sector Offer Policy in October 2018. A subsequent review and update of this policy took place in November 2021). Any offer of private rented accommodation, that will discharge any homelessness duty held to that customer as per relevant housing legislation, are made with relevance to the parameters set out in this Policy that can be found on the Council's website.

### **3.7 Enable people to remain in their homes and they are appropriate for their needs**

To provide a better service for customers and a 'one-stop shop' for the provision of Disabled Facility Grants (DFG), the Council contracted The Building Control (Hertfordshire) Company to undertake this service from April 2019.

Rather than a customer liaising with the Council's Residential Environmental Health team regarding their application for a DFG, they will instead liaise with Herts Building Control. However, the final decision on the award of a DFG will still be made by the Council. Herts Building Control, having assessed the application, will make their recommendation to the Council on the approval or not of a grant and the financial value. It will then be for the Council to either agree or disagree with their recommendation.

Predictably, grant approvals were at a low level throughout the COVID-19 pandemic, however, they have since then they have increased to levels higher than prior to the pandemic.

## Homelessness Reduction Act and The Extent And Nature Of Homelessness In Three Rivers 2017-2022

### Homelessness Reduction Act 2017

When implemented on 3 April 2018, the Homelessness Reduction Act made significant changes to how Housing Services approached the homelessness of our customers, placing significant importance on the prevention and the relief of homelessness.

The Act amended the statutory definition of homelessness from being homeless or threatened with homelessness within 28 to 56 days and created three stages (duties) to a homeless application;

- Prevention Duty (when an applicant is threatened with homelessness within 56 days)
- Relief Duty (when an applicant actually becomes homeless, this duty lasts for 56 days)
- Main Duty (a decision is required once the 56-day relief period has ended)

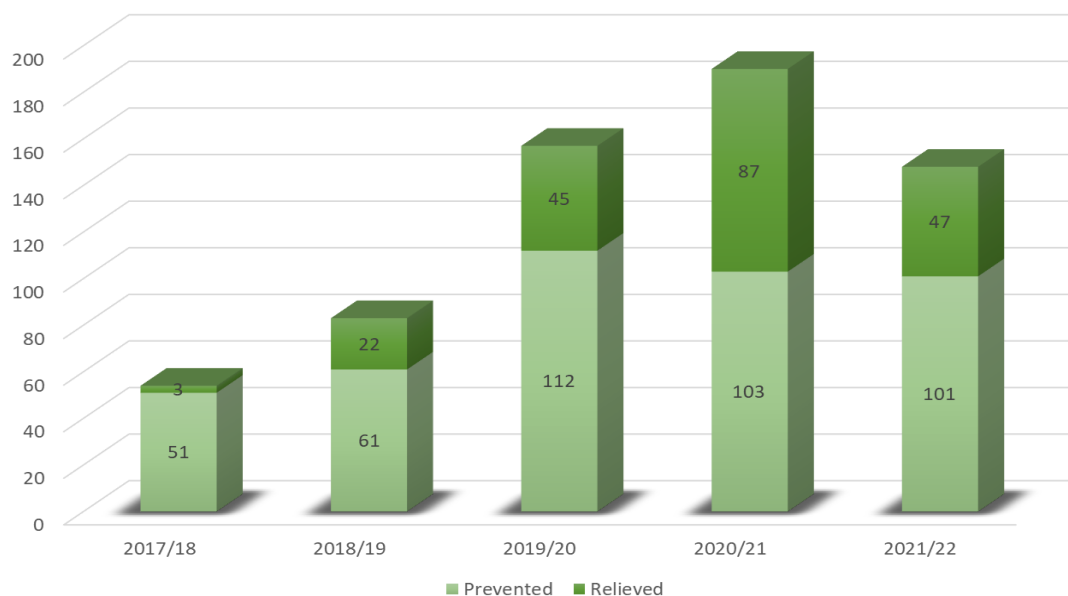
It was anticipated that the changes implemented by this Act, specifically the increase in the statutory definition from 28 days to 56 days, would see an increase in housing advice enquiries or homelessness applications.

As per the Housing, Homelessness and Rough Sleeping Strategy 2017-2022 Action Plan, the Service was tasked with being prepared for the implementation of this Act and ensuring all members of the Housing Service were fully trained in this Act and any new processes adopted by the Service.

This training was delivered to all staff in Housing Services prior to April 2018 and new procedures in the process of a homelessness application were prepared by management.

The following graph demonstrates the success of Housing Services in the implantation of this Act, ultimately contributing to an enhanced service for our customers.

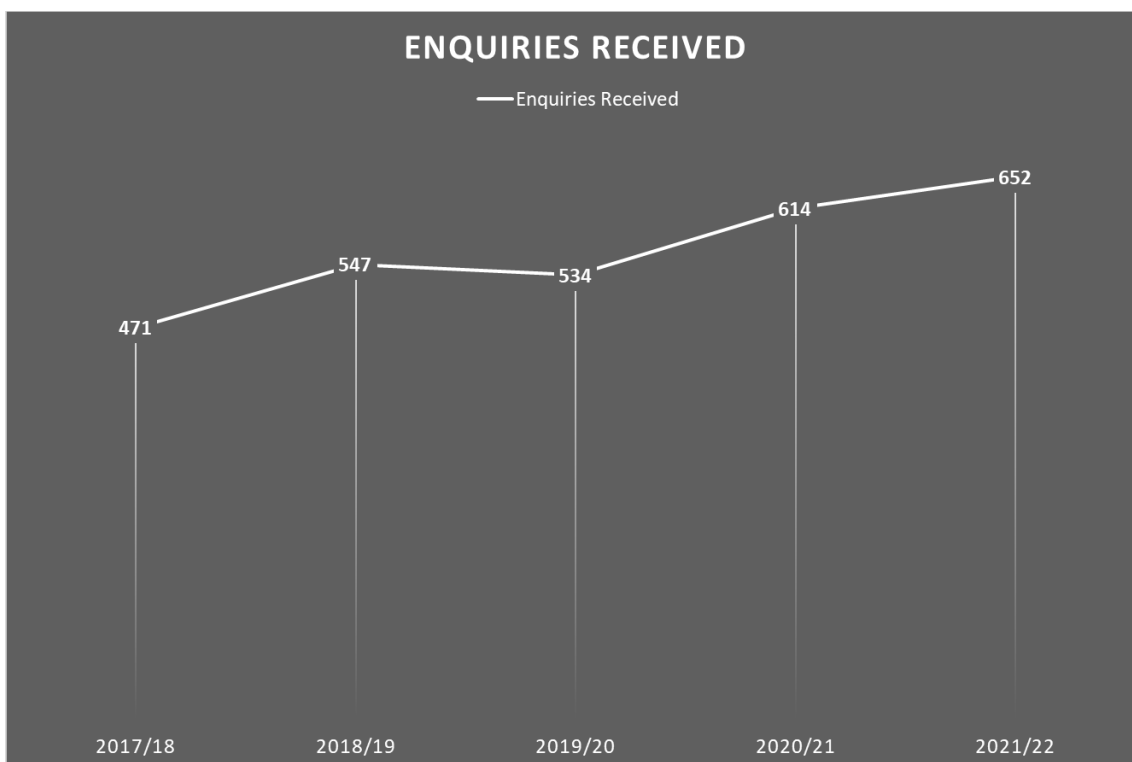
**Prevention & Relief of Homelessness**



The success by the service in the implementation of the Act should also be looked upon even more favourably, considering the impact of the COVID-19 pandemic throughout this period and how this significantly affected the way that Officers work and the relationships they were able to build with our partners and customers. The resilience of the service should be noted.

### Extent of Homelessness

The below graph sets out the total number of enquiries received from customers by the Service over this period of review.



It is important to note that not all enquiries received by the Service will result in a customer making a homelessness application to the Council.

Often customers will approach the Service for housing advice or assistance on their current circumstances. Enquiries by a customer to the Service that do not result in a homelessness application to the Council are logged as Housing Advice cases. These enquiries may result in a homelessness application at some point in the future, however, that is not always the case as a customer may resolve their own future housing need.

Enquiries received by the Service in 2017/18 reached a total of 471, with this number increasing steadily to a total of 652 in 2021/22, although a slight drop can be seen between 2018/19 to 2019/20. This drop in enquiries to the Service in this period can likely be attributed to the Government's introduction of legislation enforcing a ban on evictions, as part of their response to the COVID-19 pandemic.

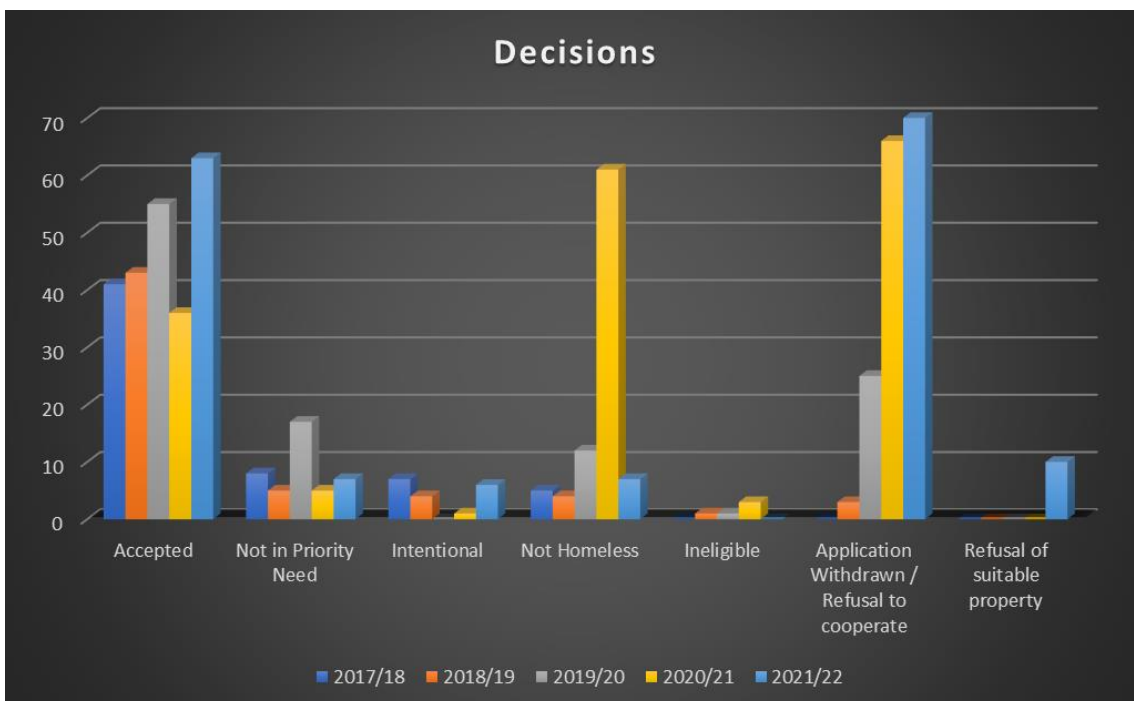
Despite this slight drop between 2018/19 to 2019/20, the above graph shows a significant increase in enquiries received by the Service from 2017 to 2022.

Should an enquiry to the Service result in a homelessness application to the Council, the



customer will be allocated a dedicated Housing Options Officer who is tasked with investigating the customer’s homelessness and providing a decision.

The below graph sets out these decisions made on homelessness applications by the Service over the period of the strategy:

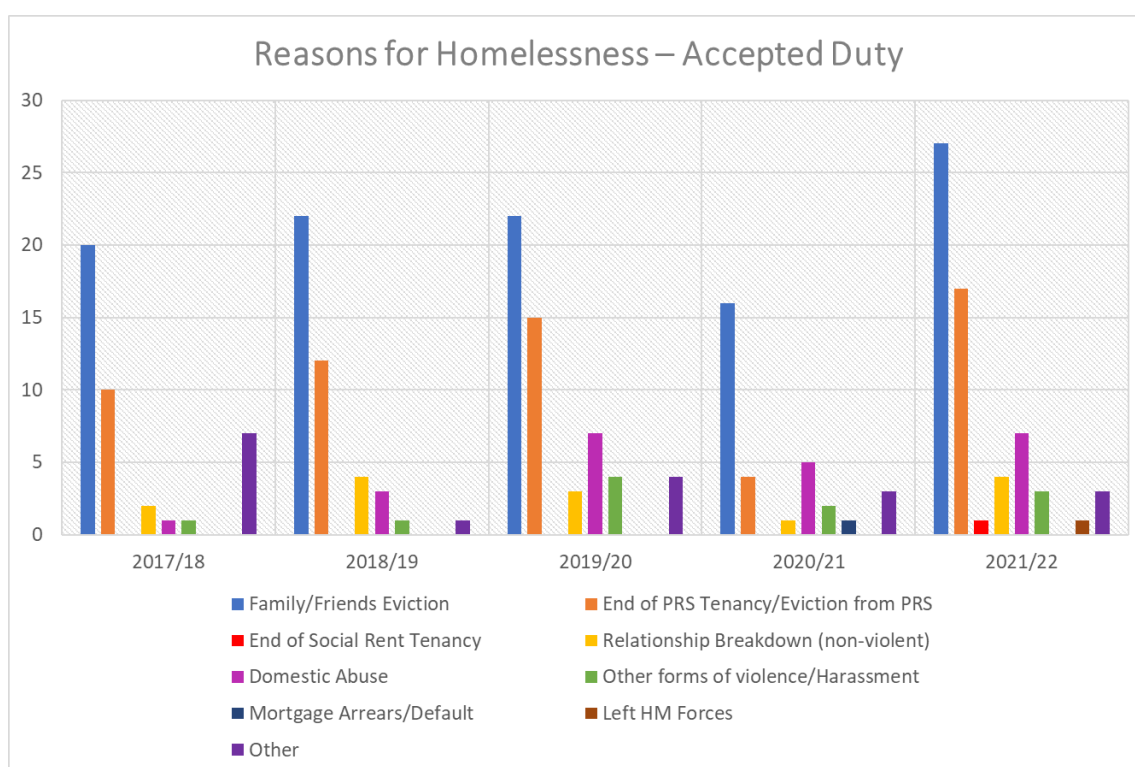


Similar to the increase in the total number of enquiries the Service has received over the period of this strategy, the above graph demonstrates a significant increase in decisions made by the Service from 2017/18 to 2021/22.

It is important to note the high number of Not Homeless decisions made by the Service in 2020/21 and the lower number of accepted homeless cases within this period.

This increase in Not Homeless decisions and the reduction in the acceptance of homeless cases made in this period can once again likely be attributed to the Government’s introduction of legislation enforcing a ban on evictions for a significant period, as part of their response to the COVID-19 pandemic.

## Reasons for Homelessness



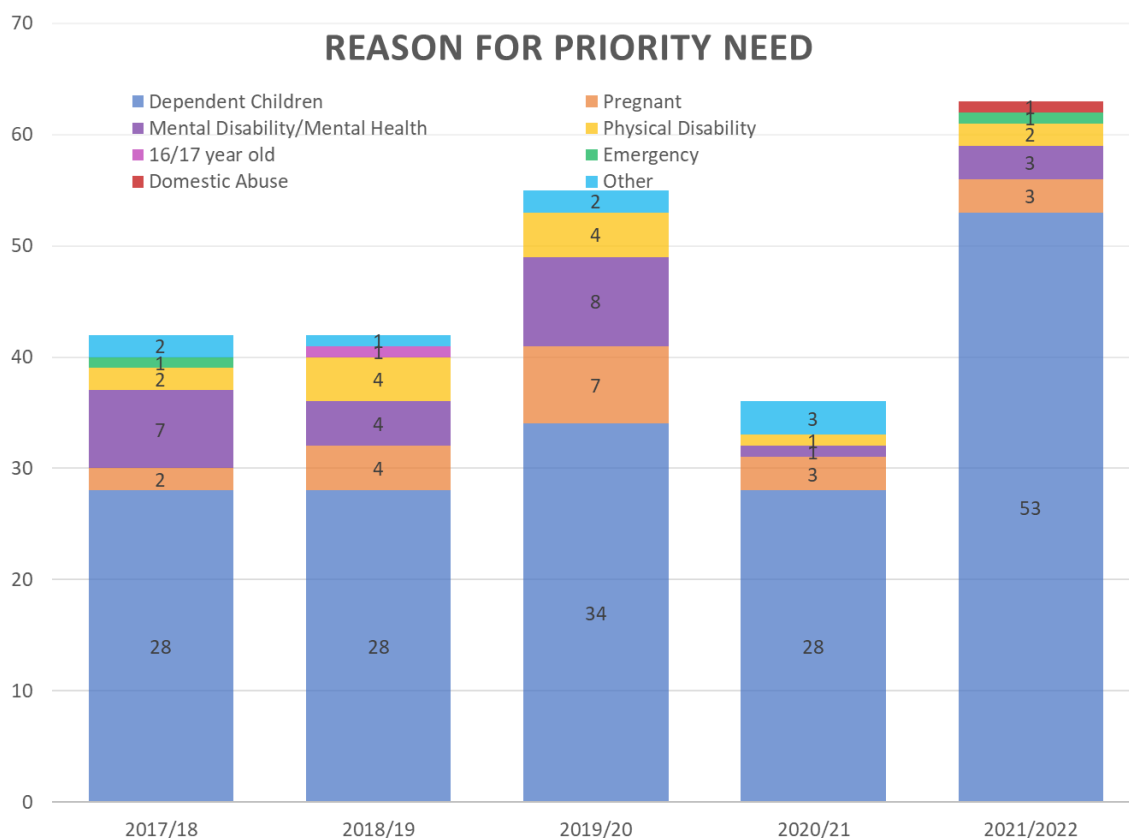
In a change from the period 2013-2016, where it was the second most common reason for homelessness behind eviction from the private rented sector, parental eviction is the now most common reason for homelessness in the district, with 32% of all customers being homeless for this reason.

This figure is raised to 45% of all homelessness cases in the district between 2017 and 2022 if you include eviction from other family and friends.

It is likely that the reason for this could be attributed to the COVID-19 pandemic and the pressure that lockdowns caused, confining families to share small spaces and increasing tensions in multi-generational households, causing damage in the relationships of family members that could not be repaired. Ultimately resulting in the complete breakdown of a relationship, causing parents to issue their children notice to leave the property.

Homelessness that can be attributed to an eviction from a property in the private rented sector is now the second most common reason for homelessness in the district. A significant increase in this reason for eviction can be seen between a low level in 2019/20 to a much higher level in 2021/22, this represents yet another impact of the Government's introduction of legislation enforcing a ban on evictions, as part of their response to the COVID-19 pandemic.

However, this reason for homelessness continued to remain high moving into 2021/22, therefore, there is likely other reasons for this increase. The high rental costs in the district, that have increased post COVID-19, coupled with the low level of local housing allowance (LHA) available to customers in the district may explain this.



The reasons for priority need of those accommodated in temporary accommodation by the Council have remained consistent over this period. As expected and similar to previous years, the significant majority, 80%, of all customers accommodated were those with dependent children or pregnant at the time of application.

All other reasons for priority need of our customers has remained steady over this period, with no real pattern emerging. However, with the introduction of the Domestic Abuse Act 2021, that declares any victim of domestic abuse to have a priority need, we do expect an increase in the years to come.

#### The use of temporary accommodation

Month	Council Owned	Nightly Let Accommodation	B&B	Other	Total
Apr-17	18	52	2	19	91
Jul-17	38	31	1	2	72
Oct-17	38	26			64
Jan-18	39	12		1	52
Apr-18	38			12	50
Jul-18	33			12	45
Oct-18	37	1		11	49
Jan-19	36			11	47
Apr-19	40			12	52
Jul-19	41	3		13	57
Oct-19	56			5	61
Jan-20	51	4		6	61
Apr-20	40	13	4	7	64

<b>Jul-20</b>	37	12	2	2	53
<b>Oct-20</b>	32	3		3	38
<b>Jan-21</b>	49	2		3	54
<b>Apr-21</b>	47	5			52
<b>Jul-21</b>	52	4		2	58
<b>Oct-21</b>	44			4	48
<b>Jan-22</b>	47	2			49

Following a commitment from Members, the Council made a significant investment in its own supply of temporary accommodation, resulting in three developments being completed between 2017- 2022, adding the availability of an additional 29 units located in the district.

The development, located in Rickmansworth Town Centre providing 17 one-bedroom properties, was completed and tenanted in September 2019. Two additional developments, both in South Oxhey and each comprising of six, two-bedroom flats, were completed and tenanted in December 2020. These three new developments, along with the existing scheme in South Oxhey, are all managed by Watford Community Housing.

The Council no longer rely on the use of bed and breakfast or hotel accommodation and the use of expensive nightly let accommodation, or block booked accommodation located a significant distance from the district has been significantly reduced. In most situations, customers are provided with clean, safe and well-maintained temporary accommodation that is located in the district, close to family, schools, employment and support networks, however, in some cases the council are forced to use clean, safe and well-maintained temporary accommodation located out of the district.

With funding assistance from Hertfordshire County Council, New Hope Trust provide support to 20 of our most vulnerable households in temporary accommodation. The tenancy sustainment team at New Hope Trust support our customers in temporary accommodation that may require assistance, including help with claiming the correct amount of housing benefit, budgeting advice or referrals to support services.

## **The Housing Allocations Policy And The Allocation Of Permanent Accommodation Via The Council's Housing Register**

The Herts Choice Homes Scheme that had been operating in Three Rivers since December 2008, ended in 2018. This meant that residents in the district were no longer able to bid for properties that were located outside of the district, via the Council's Housing Register. In most circumstances, priority for these properties was awarded to applicants who held a local connection to the local authority area that the property was located in, therefore the end of this Consortium did not result in a significant loss in available properties for our residents.

Following the end of the Herts Choice Homes Consortium and following a procurement process, the Council changed the housing software that is used by officers and customers from Locata to Home Connections. This was done to coincide with the launch of the Homelessness Reduction Act 2017 in March 2018. Significant work was undertaken by officers to ensure the transition to the new software was done in a secure and efficient manner to minimise any effect on customers.

Housing Services were able to work in conjunction with Home Connections to produce a custom application form for both the Council's Housing Register and a homelessness application, to enable the Service to best capture the information that is required at the time of an application.

The Council's Housing Allocations Policy required updating following the end of the Herts Choice Homes Consortium and to reflect multiple legislative updates, including the introduction of the Homelessness Reduction Act 2017.

Understandably, work on this project was delayed by Housing Services' response to the COVID-19 pandemic, however following consultation with residents and partnership organisations, the Council's Infrastructure, Housing and Economic Development Committee approved the Housing Allocations Policy 2020 on 16 March 2021.

It is important to note that a significant change that was made to the Policy was the introduction of composite needs. Composite needs recognise that a customer may have two separate housing needs of equal priority, which can result in having an overall greater housing need than a customer with just one housing need. Composite needs require one of the housing needs awarded to be a medical priority.

In the previous Policy, customers with a gross income of over £35,000 per annum were considered to have the financial means to resolve their own housing need, therefore they did not qualify to join the Council's Housing Register. To reflect the increasing costs of accessing the private rental sector in the district, especially larger family sized accommodation, a change was made to these figures to incorporate the bedroom need.

The following table now applies with regards to the gross household income per annum that a customer can have, before they will be considered to be able to resolve their own housing and not qualify to join the Council's Housing Register;

One Bedroom Need	£34,560.00
Two Bedroom Need	£45,396.00
Three/Four Bedroom Need	£61,200.00

The figures listed were achieved by taking a snapshot at the time of the current average rental price in the district, of each property size and multiplying that by 36. A significant portion of High Street Estate Agencies use this calculation as part of their financial referencing procedure to set the minimum annual household income figure.

The Housing Allocations Policy continues to prioritise applicants according to their assessed need, from those with an urgent need to move placed in a Band A, to those with a low medical need to move or lacking one bedroom in their current accommodation placed in a Band D. Those with no housing need and only eligible for sheltered or older person's accommodation are placed in a Band E.

To assist with customer clarity, officer efficiency and to ensure the Council complied with relevant and up to date legislation, a further update to the Council's Housing Allocations Policy was agreed by the Council's Policy and Resources Committee in November 2022.

#### **General Needs Lets through the Housing Register-**

	<b>Studio/1 bed</b>	<b>2 Bed</b>	<b>3 Bed</b>	<b>4 Bed</b>	<b>Total</b>
<b>2018/19</b>	50	44	8	1	<b>103</b>
<b>2019/20</b>	77	80	30	2	<b>189</b>
<b>2020/21</b>	89	21	7	1	<b>118</b>
<b>2021/22</b>	83	42	12	-	<b>137</b>

The significant increase in properties let via the Councils Housing Register in 2019/20 can be explained by the number of large developments that included a provision of social housing, that were finished in the district throughout that period. This included Phase 3 of the South Oxhey Regeneration Scheme.

With the exception of 2019/20, the lack of lettings of larger, family sized (three or four bedroom) accommodation is noticeable.



## The Response To And The Impact Of The COVID-19 Pandemic On Housing Services

On 23 March 2020, the Prime Minister, announced the first lockdown of the United Kingdom, as a result of the COVID-19 pandemic.

This outbreak in the spring of 2020 prompted an unpredicted public health response from the UK Government, local authorities and the voluntary sector to protect the vulnerable rough sleeping population.

Although agile/flexible working practices were already in the process of being investigated and adopted by the Council, as a result of this lockdown, the Council Offices were closed and officers in Housing Services were forced to work from home on a full-time basis. Normal practices, including the meeting of customers for their initial Housing Options appointment and any sign up of Council-owned temporary accommodation, were forced to be conducted online, requiring a significant change in adopted procedures.

Officers in Housing Services displayed a high level of resilience throughout this period and maintained their commitment to provide our customers with a high level of customer service and understanding, in a period of extreme uncertainty for many.

### 'Everyone In' Directive -

On 26 March 2020, the UK Government asked local authorities in England to 'help make sure that we get everyone in', including those who would not normally be entitled to assistance under homelessness legislation or those who would not normally receive an offer of temporary accommodation provided by the Council, following a homelessness application.

Housing Services were tasked to ensure that people sleeping rough, or in accommodation where it was difficult to self-isolate, were safely accommodated to protect them, and the wider public, from the risks associated with COVID-19. Work was also undertaken by Housing Services, to ensure those that were accommodated throughout the 'Everyone In' directive, were helped into long term accommodation and as few people as possible ended up returning to rough sleeping.

The 'Everyone In' Directive was an enormous challenge for Housing Services and required a significant uplift in the usage by the Council of expensive nightly let accommodation, which is displayed in the table below;

Month	Council Owned	Nightly Let Accommodation	B&B	Other	Total
Jan-20	51	4		6	61
Feb-20	47	4		5	56
Mar-20	41	6	1	6	54
Apr-20	40	13	4	7	64
May-20	38	15	6	4	63
Jun-20	35	18	3	3	59
Jul-20	37	12	2	2	53
Aug-20	39	11	2	2	54
Sep-20	35	7	2	2	46
Oct-20	32	3		3	38
Nov-20	36	1		3	40

Dec-20	40	2	3	45
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On 31 January 2020, there were only four homeless households in temporary accommodation that were housed in nightly let accommodation. Following the 'Everyone In' Directive in late March 2020, the usage of this type of accommodation by the Council increased rapidly, peaking in June 2020, to 18 households.

Usage of nightly let accommodation can often be required by the Council, however, as per the Council's Temporary Accommodation Placement Policy, this accommodation is often sourced in the district, or in the surrounding districts. However, throughout the COVID-19 pandemic, the Council were required to look significantly further afield than previously. This resulted in some households being accommodated for a significant period of time in areas of the country such as Milton Keynes.

Along with the increase in usage of nightly let accommodation by the Council, also displayed in this table is the increase in the use of Bed and Breakfast accommodation by the Council. The Council considers the use of Bed and Breakfast accommodation as a last resort, due to the unsuitability of this type of accommodation for a significant percentage of households, however, due to the sheer amount of accommodation that was required by all local authorities across England at this time, the usage of this type of accommodation was unavoidable.

Prior to the 'Everyone In' directive, the Council had not used Bed and Breakfast accommodation since August 2017. It is important to note, that no household with children were accommodated in Bed and Breakfast throughout the COVID-19 Pandemic.

Government statistics state that approximately 15,000 vulnerable people were housed in emergency accommodation by local authorities across England as a result of the 'Everyone In' directive.

### **UK Government 'Eviction Ban'**

The Coronavirus Act 2020, given Royal Assent on 25 March 2020, included temporary measures to protect tenants during the COVID-19 pandemic.

These measures included a stay on any possession proceedings between 27 March and 20 September 2020 and a stay on eviction proceedings between 17 November 2020 and 31 May 2021.

Covered by the stay on possession proceedings between 27 March and 27 September 2020 were a stay on applications for a possession order (including any variations), applications to enforce a possession order by warrant or writ and any appeal of a possession order. The stay on evictions between 17 November 2020 and 31 May 2021, announced on 5 November 2020, meant that it was not possible to execute a warrant or writ of possession or deliver a notice of eviction, except for the most severe cases of anti-social behaviour.

Legislation dictates that the minimum notice period a landlord is required to provide to their tenant when seeking possession of their property is two months. However, in addition to the stay of possession and eviction proceedings, the Coronavirus Act increased minimum notice periods to six months between 29 August 2020 and 31 May 2021. From 1 June 2021 to 30 September 2021, the minimum notice period a landlord was required to provide to their tenant was four months.

The impact of the UK Government's 'Eviction Ban' on Housing Services can be clearly

observed in the temporary accommodation tables displayed on page **19**. In October 2020, the number of households in temporary accommodation dropped to 38, the lowest number throughout this period of review.

By July 2021, the number of households that were accommodated in temporary accommodation was at 58, representing a 53% increase over the nine-month period.

### **Next Steps Accommodation Programme (NSAP)–**

In July 2020, following on from the ‘Everyone In’ directive and the aim to support those temporarily housed into long term accommodation, ultimately ensuring as few people as possible ended up returning to rough sleeping, the next stage of the Government’s COVID-19 Rough Sleeping response was released.

Local authorities in England were invited to apply for the award of financial resources that were needed to undertake this work. In late 2020, Housing Services applied for this grant funding from the Next Steps Accommodation Programme (NSAP).

The Council were successful in being granted £513,015 of additional funding, however, as a non-stock holding authority we worked with a Registered Provider in order to receive these funds.

This money was therefore paid directly from the Department for Levelling Up, Housing and Communities (DLHUC) to Watford Community Housing (WCH), as our named partner.

This funding was used to facilitate the purchase of five, fully furnished, one-bedroom properties, across the district. Although these properties were purchased by Watford Community Housing, as the local authority that was successful in the application for this funding, the Council maintain 100% nomination rights to these properties. These nomination rights are set out and secured by a Nominations Agreement that is signed by both parties.

These properties are exclusively for the use of single customers who are rough sleeping or who are at risk of rough sleeping, and who have complex support needs. Funding is provided by the grant to provide these customers with intensive support, currently provided by New Hope Trust. The properties are let at affordable rent levels, capped at the Local Housing Allowance (LHA) for the district.

As part of this Scheme, customers are granted a two-year assured shorthold tenancy that requires their complete engagement with support from New Hope Trust and other partnership organisations. The goal for this scheme is that at the end of the two-year period, the customer with complex support needs can demonstrate to a social housing provider that they are able to maintain a tenancy and will be able to be nominated for a general needs property, via the Council’s Housing Register. Once a customer has moved on to general needs accommodation, the property will be let to another customer who has been rough sleeping or who is at risk of rough sleeping.

The first tenants of these five properties were accommodated in these properties in August 2021.

### **Rough Sleeping Accommodation Programme (RSAP) -**

Following the success of the Next Steps Accommodation Programme (NSAP), in October 2021 the UK Government invited Local Authorities to apply for further funding as part of the Rough Sleeper Accommodation Programme (RSAP).

Housing Services applied for grant funding from the Rough Sleeping Accommodation Programme (RSAP), in partnership with Watford Community Housing (WCH). Similarly to the NSAP Scheme, as a non-stock holding authority, we worked with a Registered Provider in order to receive any funding if successful.

Contained in this application for funding was a commitment from the Council, that it would commit £100,000 of Section 106 monies to this project, should the bid be successful. We were successful in being awarded £410,286 which was paid directly from DLUHC to WCH as our named partner. These funds, in addition to the contribution from the Council, were used to facilitate the purchase of a further five, one-bedroom, fully furnished properties across the district.

Although, once again, these properties were purchased by WCH, as the Council was successful in the application for this funding and with the Council's contribution of Section 106 monies, the Council maintain 100% nomination rights to these properties. These nomination rights are set out and secured by a Nominations Agreement that is signed by both parties.

Similar to the NSAP Scheme, these properties are exclusively for the use of single customers who are rough sleeping or who are at risk of rough sleeping, or who have complex support needs. Funding is provided by the grant to provide these customers with intensive support, currently provided by New Hope Trust. The properties are let at affordable rent levels, capped at the Local Housing Allowance (LHA) for the district.

As part of this Scheme, customers are granted a two-year assured shorthold tenancy that requires their complete engagement with support from New Hope Trust and other partnership organisations. The goal for this scheme is that at the end of the two-year period, the customer with complex support needs can demonstrate to a social housing provider that they are able to maintain a tenancy and will be able to be nominated for a general needs property, via the Council's Housing Register. Once a customer has moved on to general needs accommodation, the property will be let to another customer who has been rough sleeping or who is at risk of rough sleeping.

The first tenants of these five properties were accommodated in these properties in December 2022.

As a direct result of the successful funding applications submitted by Housing Services for both the Next Steps Accommodation Programme and the Rough Sleeper Accommodation Programme, in addition to the Section 106 monies contributed by the Council, there are now ten properties available throughout the district that are available for use by customers that have been rough sleeping, or at risk of rough sleeping, who have complex needs that mean that placement into a general needs property, via the Council's Housing Register, is unlikely.

These properties were not only a resource that was invaluable to Housing Services and customers who were placed into temporary accommodation as a result of the 'Everyone In' directive immediately post the COVID-19 pandemic but will continue to be an invaluable resource for the future for this cohort of customers and a significant part of our commitment to support our most vulnerable customers into permanent and suitable accommodation.

#### **Rent Arrears Support Scheme-**

Following the announcement of the UK Government's support package for vulnerable renters in October 2021, the Council were awarded a grant of £59,137. This grant funding

enabled Housing Services to set up a Rent Arrears Financial Support Scheme, to support low-income renters with COVID-19 related rent arrears to avoid eviction or to find a new home where necessary in order to prevent homelessness.

Housing Services worked in partnership with Registered Providers, private landlords and residents, in order to identify those low-income renters, who were in danger of eviction due to rent arrears accrued as a direct result of the COVID-19 pandemic and target the funding provided to those who were most in need.

The information that was required from customers before any payment was approved by Housing Services was set out in the Council's COVID-19 Rent Arrears Financial Support Scheme 2021/22 Policy, approved by the Council's Policy and Resources Committee on 6 December 2021. As per this Policy, any funding that was provided was paid directly to the landlord of the tenant at risk of homelessness and following this, the tenant was referred to Citizens Advice for financial advice to ensure that they do not accumulate further rent arrears in the future.

Using the full allocation of this funding, Housing Services prevented the homelessness of 29 households across the district.

## **What can be expected over the next five years?**

### **Impact of the UK's Cost of Living Crisis**

The phrase 'cost of living crisis' refers to the fall in real disposable income currently affecting the population of the United Kingdom. It is generally agreed that the current cost of living crisis started in late 2021 and most economists predict that this sharp increase in the rate of inflation across the country will remain until at least the end of 2024.

The rate of inflation in the UK is at its highest point within the last three decades, currently sitting at 10.7% as of November 2022. This has predominantly been caused by the response to the COVID-19 pandemic, the impact that Russia's invasion of Ukraine has had on gas and electricity prices and to a lesser extent, supply chain issues that have been caused due to the UK's withdrawal from the European Union.

Due to the pressures that these increased costs will place on households within the district, we can safely assume that there will be a direct impact on the number of homelessness applications the Council will receive from people who are simply unable to afford to remain in their current accommodation beyond the end of 2024.

Due to this rise in inflation, on 15 December 2022, the Bank of England increased the base interest rate to 3.5%, in March 2022 this base interest rate was at a record low of 0.10%. Not only will this have a significant impact on the owners of property within the district, inevitably causing some to default on their current mortgage and approach the Council for advice or assistance with their homelessness, but the Council expect this to have a considerable impact on landlords in the district.

Following this exceptional interest rate increase and the expected further increase in interest rates, the Council expect landlords in the district to either continue to increase the rent to reflect these costs or look to sell their properties as they are no longer able to afford to continue to be a landlord. Both will cause an increase in the number of homelessness applications received by the Council, however, the latter will also directly affect the amount of private rental stock in the district that is available to the Council to assist with discharging our relevant housing duties towards our customers.

### **Impact of the COVID-19 Pandemic on the Mental Health of our customers**

Numerous studies commissioned by a variety of different organisations have clearly indicated that the COVID-19 pandemic has adversely affected the mental health of the population of the UK. It has been estimated that up to 10 million people in England will require new or additional mental health support as a result of the pandemic. The Council is mindful that this will include our customers and any potential applicants to the Council's Housing Service.

Results from a survey launched in April 2021 by the mental health charity Mind, which received almost 12,000 responses, indicate that around a third of adults and young people stated that their mental health has deteriorated since the first lockdown in March 2020.

Of the people who responded to this survey that are currently on benefits, 58% of these stated that their mental health was currently poor and 9 out of 10 young people stated that the loneliness they experienced as a result of the lockdown implemented by the UK Government has worsened their mental health.

It is also important to note that Mental Health services throughout the country are experiencing a significant backlog in the treatment of people requiring support for their



mental health, therefore, it is highly likely that the Housing Service will see an increase in the number of vulnerable individuals contacting the Council for housing advice or assistance.

The Housing Service must be ready to deal with an increasing amount of vulnerable customers who are experiencing mental health issues. This will be exacerbated by the current lack of treatment options and the potential for any self-medication as a result of this delay that may cause an impact in other areas of our customer's circumstances. This includes rough sleeping, substance addiction or criminal behaviour.

### **Homes for Ukraine**

As of 19 December 2022, there have been 149 guests confirmed to have arrived in the district as part of the UK Government's Homes for Ukraine Scheme.

Although the Office for National Statistics (ONS) estimate that 25% of all Homes for Ukraine sponsors intend to house their Ukrainian guests for a period of six months or fewer, this is a national survey and the Council is unable to determine what percentage of guests staying in Three Rivers will be affected.

It is anticipated that Hertfordshire as a whole will have an increase in homelessness applications from guests on this Scheme as some sponsors look to end their offer of accommodation at the six-month mark and beyond. This will inevitably lead to an increase in homelessness applications to the Council from guests that are currently housed in Three Rivers as part of this scheme, meaning an impact on the case load of officers and demand for temporary accommodation.

### **Asylum Dispersal**

In April 2022, the UK Government announced a new full asylum dispersal system to be overseen by the Home Office. It was stated that this has been created to form a new, fairer asylum dispersal system. The Home Office have since issued regional allocations for the UK as a whole. These have been based on an illustrative planning number of 100,000 asylum seekers in dispersed and core initial accommodation by December 2023. The regional allocation for Hertfordshire was 801 bed spaces, with 68 of those being allocated to Three Rivers.

Private contractors to the Home Office will be responsible for the procurement of these bed spaces from the private rented sector throughout our district. This may lead to a significant impact on the number of private rented sector properties in the district available to the Council. Some landlords in the district may prefer to let their property to the Home Office over the Council, due to the financial package that the Home Office are able to offer.

In addition to the impact on the Council's ability to procure private rental properties, it is also expected that there will be a future impact on the Council's Housing Options service. It is likely that when individuals/families are placed in the district, whilst their claim for asylum is being assessed, they will likely make ties to the district. If their asylum claim is approved, they will be eligible for housing assistance.

Following the approval of an individual/family asylum claim they will be evicted from the asylum dispersal accommodation and following this, it is highly likely a homelessness approach will be made to the Council.



This will result in a further impact on the demand for temporary accommodation provided by the Council and an impact to the caseload of officers.

### **Afghan Refugees**

Operation Pitting, a British military operation tasked with extracting Afghan nationals (and their families) who had assisted the British military forces throughout their occupation of Afghanistan, was announced on 13 August 2021 by Central Government in response to the fall of Kabul to the Taliban.

Since this operation, and in the following months, Afghan refugees who have arrived in the UK have been housed in 'bridging hotels' provided by the Home Office. Although none of these hotels have been located in Three Rivers, there were two located in Hertfordshire, one in Hertsmere and the other in Dacorum.

In April 2023, guests in these hotels were provided with notice from the Home Office that this accommodation would be coming to an end by August 2023. Guests were informed that they would need to source their own accommodation, or if they were unable, they would need to approach a local authority for homelessness advice and assistance.

Central Government have made additional funding available for any local authority that is required to process a homelessness application from a household from this cohort, however, it is likely that should the Council receive any approaches from this cohort there will be additional pressure on the Housing Service in terms of staff resources and temporary accommodation.

Afghan nationals sourcing their own accommodation or having assistance from neighbouring local authorities to do this, will also create additional impact on an already crowded private rented sector market.

### **Private Rented Sector**

Even prior to the predicted future impacts on the private rented sector in the district that have been set out in this review, the private rented sector in the district continues to be largely unaffordable for the many low income and benefit dependent households in the district.

Significant proportions of the district fall under the following postcodes WD3 (Maple Cross, Mill End, Rickmansworth, Croxley Green, Sarratt, Moor Park, Chorleywood, Chandlers Cross), WD19 (South Oxhey, Oxhey, Carpenders Park), WD4 (Kings Langley, Hunton Bridge) and WD5 (Abbotts Langley, Bedmond).

The below table uses figures from home.co.uk which sets out the average monthly rental prices in these post codes at the time of this review, in comparison with the current Local Housing Allowance (LHA) and demonstrates the disparity between the two;

Area	1 Bed	2 Bed	3 Bed	4 Bed
WD3	£1,113.00	£1,692.00	£2,800.00	£2,744.00
WD19	£1,250.00	£1,916.00	£2,150.00	£2,732.00
WD4	£1,244.00	£1,653.00	£2,000.00	£3,100.00
WD5	Nil Available	£1,198.00	£2,150.00	Nil Available
Local Housing Allowance (LHA)	£797.81	£997.27	£1,296.45	£1,695.33

Although the average monthly price for a rental property can be slightly misleading in our district, as some properties will be closer to the level of the Local Housing Allowance and others will be extremely high in the affluent areas of the district, nonetheless the above shows the significant and worrying difference between the Local Housing Allowance and the monthly price of rental properties in the district.

The Housing Service expect this difference to continue to increase as a consequence of the current and ongoing cost of living crisis in the UK.

To highlight this increased disparity, in 2018 the average monthly price of a two-bedroom rental property in the WD3 area was £1271.00 and the Local Housing Allowance at this time was £879.10, representing a difference of £391.90 per month. At the time of this review, the average price of a two-bedroom property in WD3 is £1949 and the current Local Housing Allowance for a property of this size is £997.27, representing a staggering difference of £951.73 per month.

### **Rent Deposit Guarantee Scheme**

The Council continue to operate a Private Rented Sector Scheme that is overseen by the Council’s Private Housing Coordinator, a position that was appointed in March 2018, following a period of vacancy.

The Housing Service have had reasonable success in the procurement of private rental properties to join the Scheme over the past five years, especially in the last two years, as demonstrated below;

	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>
Properties acquired to the RDGS	1	4	4	15	13
Properties re-let on the RDGS	3	7	4	4	5

However, with the changing nature of the private rented sector in the district and the decreasing availability of properties that are suitable for this scheme (equal to, or close to the Local Housing Allowance) it is accepted that the Housing Service will need to review and redesign our Scheme in order to make a competitive offer to landlords in the district.

### **Domestic Abuse Act 2021**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021.

The Act ensures that any person that is made homeless due to being a victim of domestic abuse will have an automatic priority need for homelessness assistance. This means that they will be offered temporary accommodation by the Council whilst their homelessness is investigated.

There has been a slight increase in the amount of customers approaching our service over the last five years as a result of being made homeless due to being a victim of domestic abuse (2017/18 – 1 to 2021/22 – 7), however, due to the continued increase in domestic abuse related crimes that are being recorded by the Police and the now automatic priority need granted to any victim of domestic abuse, the Housing Service predicts an ongoing rise in these applications over the next five years.

The Council's Housing Allocations Policy has been updated to reflect this change in legislation and to ensure that the Council will ensure that any customer who is suffering from domestic abuse and engaging with the Council's Housing Options service;

- Are given appropriate priority on the Council's Housing Register
- Are not disadvantaged by any local connection qualifying criteria if they have fled to a refuge in another local authority area, and
- Are not disadvantaged by any local connection qualifying criteria if they have fled from another local authority area

## **Renters Reform Bill**

In June 2022 Central Government published their Fairer Private Rented Sector White Paper that set out the details of its plan for the Renters (Reform) Bill.

Following the publishing of this White Paper, The Renters (Reform) Bill has since been brought forward and has had its first reading in Parliament on 17 May 2023. Central Government have made a commitment to have this bill passed into law before the next general election.

Although some changes to the Bill can be expected as it passes through the Houses of Parliament, at the time of this review the Bill represents a significant change to the sector that aims to transform private renting in England. In its current form, the Bill plans to abolish assured shorthold tenancies (AST) and Section 21 'No Fault' evictions, to provide tenants with more security of tenure and empowering them to challenge unfair rent increases or poor standards in their property, without the fear of eviction.

The Bill will introduce reformed grounds for possession for landlords, so they are able to evict tenants where necessary and aims to make it easier for landlords to repossess their properties where tenants are at fault, including in circumstances of significant antisocial behaviour or repeat rent arrears.

The extent of change that is proposed as part of this Bill will require significant action from the Housing Service. The Council's Rent Deposit Guarantee Scheme will require reform and it is anticipated that the introduction of this Bill as legislation will reduce the amount of private rented sector properties in the district available to the Council. A reduction is expected as the reaction from private landlords to the Bill has been largely negative and has contributed, in addition to the current economic climate, to several landlords planning to exit the sector.

## **Resources**

In the short term, the financial resources will be adequate to meet the demand that is predicted, predominantly due to DLUHC recently confirming the UK Government's continuation of the homelessness prevention fund until at least April 2025.

Due to the Council's significant investment in the construction of additional Council owned temporary accommodation stock over the past five years, the Housing Service predict that our temporary accommodation resource will be sufficient to meet the predicted demand.

Further funds will be available should the use of nightly let accommodation be required at any point over the next five years.



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**THREE RIVERS DISTRICT COUNCIL  
HOUSING, HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2023-28  
ACTION PLAN**

REF	AIMS	ACTIONS	OUTCOMES	LEADS	TARGET
1.0	<b>OBJECTIVE 1: PREVENT AND RELIEVE HOMELESSNESS</b>				
1.1	Ensure flexible use of the Council's Homelessness Prevention Fund.	Housing Services will continue to review how the grant funding is used to ensure it is targeted in the most appropriate manner.	Grant funding is used efficiently and effectively to prevent and relieve homelessness in the district.	Housing Operations Manager / Strategic Housing Manager	Ongoing
1.2	Implement a cost-of-living homelessness prevention project.	Housing Services to design and fund a Cost-of-Living homelessness prevention project in partnership with Registered Providers.	An increase in homelessness prevention in the district.	Housing Operations Manager / Strategic Housing Manager	2024
1.3	All tenants of Registered Providers (RP's) threatened with eviction are prevented from homelessness wherever possible.	Devise an early identification and intervention protocol with all Registered Providers to highlight factors such as rent arrears, antisocial behaviour, and tenancy sustainment.	Agreed protocol with all RPs so that tenants threatened with eviction for any reason will receive advice and options	Registered Providers and Housing Operations Manager	2024
1.4	Ensure staff are aware of the new trends which will predict our busier periods to enable them to prepare sufficiently	Monitor and analyse the statistics related to the Housing Service	To predict new demands to the Service, specifically related to the ongoing cost of living crisis	Strategic Housing Manager / Housing Development Officer	Ongoing

1.5	Better understanding of rough sleeping in the district.	To develop improved ways of recording and assessing rough sleeping in the district with the use of GIS mapping software. Sightings are to be recorded on a map to identify any hotspot area.	Hotspots and trends identified in the district	Housing Operations Manager and Housing Development Officer	Ongoing
1.6	Promotion of homelessness prevention services	Publicise and promote the Council's homelessness prevention services and encourage customers to contact us early or when at risk of rough sleeping, before any crisis.	Increased early intervention and an increase in homelessness prevention	Housing Operations Manager/ Strategic Housing Manager	2024
1.7	All customers to be referred to any support services they require	Update all procedures to ensure that officers refer all customers engaging with the service to any support service they may require (CGL, MIND, Citizens Advice etc.) in a prompt manner	Increased support for customers	Strategic Housing Manager	2024
1.8	Correct and up-to-date information is always available to customers	Consistently review information on the Council's website in relation to Homelessness is clear, concise and up to date with relevant legislation	Customers are fully informed of advice and assistance the Council can offer. Increased early intervention.	Housing Operations Manager / Senior Housing Options Officer / Communications	Ongoing
1.9	New Hope to provide the Council's Severe Weather	Explore the possibility of New Hope Trust providing	SWEP beds provided by New Hope Trust in the Haven Centre	Housing Operations Manager	2024



	Emergency Protocol (SWEP) provision.	the Council's SWEP Provision.			
1.10	Housing Allocations Policy to remain up to date with legislative updates	Review of the Council's Housing Allocations Policy to take place in 2026	Housing Allocations Policy to incorporate legislative updates and ensure it contributes to the prevention and relief of homelessness in the district	Strategic Housing Manager	2026
1.11	Revamp of the current Rent Deposit Guarantee Scheme (RDGS)	Look at different products/services we can offer as part of our Scheme and ensure the Scheme complies with any guidelines set out in the Renters (Reform) Bill.	Increase the Council's access to PRS Properties	Strategic Housing Manager/ Private Housing Coordinator	2024
1.13	Increase the level of mediation work and home visits to households	Housing Options Officers to visit every household that is a family/friends eviction at an early stage to identify any prevention opportunities.	Minimise the level of family/friends evictions.	Housing Operations Manager	2024
1.14	Work in partnership with Planning Policy and Regulatory Services to ensure the ongoing delivery of affordable housing in the District.	The Housing Development Officer will work in partnership with Planning Officers to ensure any appropriate development offers the Council the required mix of affordable housing requested before any planning application is granted.	Successful enforcement of Policy CP4 of the Adopted Core Policy.	Housing Development Officer	Ongoing

1.15	Review the target for housing and the affordable housing provision within this plan, following the adoption of the new Local Plan.	Ensure that the affordable housing mix requested at any appropriate development is in line with the council's current housing requirements.	The right size and type of affordable housing are built in the district.	Housing Development Officer / Strategic Housing Manager	2025 (or following the Council's adoption of the new Local Plan)
<b>2.0</b>	<b>OBJECTIVE 2: SUPPORT OUR MOST VULNERABLE CUSTOMERS INTO PERMANENT AND SUITABLE ACCOMMODATION</b>				
2.1	Efficient use of the Council's five Next Steps Accommodation Program (NSAP) properties	Continue to nominate vulnerable customers, who will require a level of wrap-around support, to these properties when vacancies arise	NSAP Properties will only be used for vulnerable customers	Strategic Housing Manager / Housing Operations Manager	Ongoing
2.2	Efficient use of the Council's five Rough Sleeper Accommodation Program (RSAP) properties	Continue to nominate vulnerable customers who have been rough sleeping or at risk of rough sleeping and who will require a level of wrap-around support, to these properties when vacancies arise	RSAP Properties will always only be used for vulnerable customers, who have been rough sleeping or are at risk of rough sleeping	Strategic Housing Manager / Housing Operations Manager	Ongoing
2.3	Vulnerable customers housed in the Council's temporary accommodation to be provided support.	We will work collaboratively with Hertfordshire County Council to enable vulnerable customers in temporary accommodation to be provided with intensive support by New Hope Trust (or similar agency)	Vulnerable customers to be supported in temporary accommodation	Strategic Housing Manager / Housing Operations Manager	Ongoing

2.4	A single homeless pathway for adults with complex needs who are homeless or at risk of homelessness is to be established in Three Rivers.	Work in partnership with the Strategic Partnerships Team at Hertfordshire County Council to establish this pathway in the district	Single adults with complex needs will have a dedicated pathway to support them into long-term settled accommodation	Housing Operations Manager	2023/24
2.5	Maximise funding opportunities	Building upon recent success (NSAP, RSAP, RSI), use established relationships with partners to identify funding streams and opportunities to bid for any funding dedicated to new initiatives for this cohort of customers.	Any potential funding granted, following a successful bid, is used to fund more long-term accommodation opportunities for vulnerable customers.	Strategic Housing Manager	Ongoing
2.6	RSI-6 funding granted by DHLUC to continue to provide a Housing Navigator post	The Housing Navigator provides intensive support to our vulnerable customers. Funding for the Council's Housing Navigator ends in 2025, therefore a bid for further funding will be completed at this time	If funding is granted, the Housing Navigator post will be funded until 2028	Housing Operations Manager / Strategic Housing Manager	2025
2.7	Support victims of Domestic Abuse	Fulfil our duties in relation to the Domestic Abuse Act 2021 and any subsequent legislative updates. Ensure all policies and procedures reflect this.	Increased support and options for survivors of Domestic Abuse	Housing Operations Manager	Ongoing

2.8	Further allocation of AeFO MoU funding awarded	Funding application to be submitted to DHLUC for further funding to assist in providing long term accommodation to ex-offenders on their release from incarceration.	More opportunities for long term accommodation options for customers in these circumstances	Housing Operations Manager	Ongoing
2.9	Oversee the integration of a Domestic Abuse Caseworker within the Housing Service.	To support victims of Domestic Abuse and ensure they are aware of all available support available to them.	Victims of Domestic Abuse are fully supported, and the Council is aware of the risks to them.	Housing Operations Manager	2023/24
2.10	To ensure the Council is fulfilling our statutory responsibilities to members and ex-members of the Armed Forces, and their family members.	The Housing Solutions Manager will undertake ongoing professional development in the form of regular training on the Council's responsibilities as signatories of the Armed Forces Covenant.	The Council is aware of any updates to our responsibilities to this cohort at an early stage and can fulfil as required.	Housing Operations Manager/Housing Solutions Manager	2024
<b>3.0</b>	<b>OBJECTIVE 3: IMPROVE THE STANDARD OF HOUSING ACROSS THE DISTRICT</b>				
3.1	Improve awareness of conditions in the private housing sector	Commission a private sector housing stock condition survey	Better understanding of conditions in the private sector	Strategic Housing Manager	2026
3.2	Improve standards in the private rented sector	Develop and implement an action plan following the private sector housing stock survey	Improve conditions and landlord knowledge in the private rented sector	Strategic Housing Manager	2026/27
3.3	Enable people to remain in their homes and ensure they are appropriate for their needs	Make the best use of funding from the Better Care Fund regarding Disabled Facilities Grants (DFG)	People living in homes appropriate for their needs.	Strategic Housing Manager / Hertfordshire Building Control	Ongoing

3.4	Clear guidance for discharging our homeless duties into the private rented sector	Review the Private Rented Sector Offer Policy	Properties used to prevent or relieve homelessness are to an acceptable and agreed standard	Strategic Housing Manager	2024
3.5	Establish a Houses in Multiple Occupation (HMO) monitoring programme	Identify unlicensed HMOs in the district and monitor HMOs that are currently licensed by the Council for adherence to legislative updates.	HMOs in the district to be safe and suitable for customers to occupy	Strategic Housing Manager	2024
3.6	Establish a protocol for dealing with complaints of housing disrepair, specifically those relating to damp and mould	Agree on a protocol to deal with complaints of housing disrepair from tenants in social housing in the district.	Housing Disrepair issues rectified swiftly without the use of formal enforcement powers on partners.	Strategic Housing Manager	2026
3.7	Housing Enforcement Policy	Draft a new Housing Enforcement Policy to provide clear guidelines to Housing Enforcement Officers and customers about our process for dealing with complaints about housing disrepair/ statutory nuisance	Policy adopted by the Council.	Strategic Housing Manager/Housing Development Officer	2024
3.8	Ensure we are fully prepared for when the Renters (Reform) Bill becomes an Act of Parliament	Prepare the Service for significant changes to the sector, ensuring the structuring and resourcing is fit for purpose.  Ensure all staff are fully trained in new legislation.	The Service is prepared for the Act.	Strategic Housing Manager	2024

3.9	Encourage our Registered Providers and developers to build net zero homes, promote sustainable living and make space for nature within any development in the district.	Initiate conversations with RP's and developers at the early stage of a proposal.	An increase in net zero homes built within the district over the period of the strategy.	Housing Development Officer	Ongoing
3.10	Ensure that PRS landlords within the district are aware and fully informed of the funding opportunities available to them to make significant improvements to the standard of their properties.	<p>The Climate Change and Sustainability Officer to make presentations to landlords at the Council's ongoing Landlord's Forums.</p> <p>Actively promote these opportunities to any landlord engaging with the Council.</p>	An increase in landlords engaging with the Council using these funding opportunities to improve the standards of their property.	Private Housing Coordinator	Ongoing

## Short Equality Impact and Outcome Assessment (EIA)

EIAs make services better for everyone and support value for money by getting services right first time.

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then action plan to get the best outcomes for staff and service-users<sup>1</sup>. They analyse how all our work as a council might impact differently on different groups<sup>2</sup>

They help us make good decisions and evidence how we have reached these decisions.<sup>3</sup>

See end notes for full guidance. For further support or advice please contact the Community Partnerships Team

### Equality Impact and Outcomes Assessment (EIA) Template

First, consider whether you need to complete an EIA, or if there is another way to evidence assessment of impacts, or that an EIA is not needed<sup>4</sup>

<b>Title</b> <sup>5</sup>	Housing, Homelessness and Rough Sleeping Strategy 2023-2028  Housing, Homelessness and Rough Sleeping Strategy 2023-2028 Action Plan	<b>ID No</b> <sup>6</sup>	HS002
<b>Team/Service</b> <sup>7</sup>	Housing Services		
<b>Focus of EIA</b> <sup>8</sup>	<p>The Housing, Homelessness and Rough Sleeping Strategy 2023-2028 links to the Council's Corporate Framework 2023-2026, which sets out the Council's vision to make Three Rivers 'a great place to live, work and visit'.</p> <p>The strategy sets out a vision to make Three Rivers a district where our residents feel supported, by ensuring that the district is a place where people have access to good quality housing, where the most vulnerable residents, including those who are victims of domestic abuse, are supported and where rough sleeping, or the risk of rough sleeping, is eliminated.</p> <p>Following a four-week public consultation, the final draft of the strategy outlines three key objectives for the Council over the period of five years –</p> <ul style="list-style-type: none"> <li>- To prevent and relieve homelessness.</li> </ul>		



	<ul style="list-style-type: none"> <li>- Support our most vulnerable customers into permanent, suitable, and sustainable accommodation.</li> <li>- To improve the standard of housing across the district.</li> </ul> <p>To ensure the delivery of these objectives, an action plan has been developed to run alongside the strategy. As housing is a dynamic environment, this action plan will be a live document that will enable Officers to react quickly to any changing priorities or significant legislative reform.</p>
<p><b>Assessment of overall impacts and any further recommendations</b> <sup>9</sup></p>	
<p>The objectives proposed within the policy and the action plan should positively impact on those with protected characteristics.</p>	
<p><b>Potential Issues</b></p>	<p><b>Mitigating Actions</b></p>
<p>No negative impact to people with protected characteristics arising from the objectives stated in the Policy and the action plan that enables the delivery of these objectives.</p>	<p>Multiple actions within the action plan will have a positive impact on those with protected characteristics.</p> <p>These include increased support for those with mental health disabilities and enabling those with disabilities to remain on their current homes and ensure that these homes remain suitable for their needs.</p>
<p><b>Actions Planned</b> <sup>10</sup></p>	
<p>Further EQIAs will be completed as necessary relating to specific work delivered as a result of this policy and the actions contained within the action plan.</p>	

EIA sign-off: (for the EIA to be final an email must sent from the relevant people agreeing it or this section must be signed)

**Equality Impact Assessment officer:** Jason Hagland - Strategic Housing Manager     **Date:** 04/01/2023

**Equalities Lead Officer:** Shivani Davé, Partnerships Manager     **Date:** 04/01/2023

## Guidance end-notes

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<sup>1</sup> The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- Knowledge: everyone working for the council must be aware of our equality duties and apply them appropriately in their work.
- Timeliness: the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- Real Consideration: the duty must be an integral and rigorous part of your decision-making and influence the process. • Sufficient Information: you must assess what information you have and what is needed to give proper consideration.
- No delegation: the council is responsible for ensuring that any contracted services which provide services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- Review: the equality duty is a continuing duty. It applies when a policy is developed/agreed, and when it is implemented/reviewed.
- Proper Record Keeping: to show that we have fulfilled our duties we must keep records of the process and the impacts identified.

NB: Filling out this EIA in itself does not meet the requirements of the equality duty. All the requirements above must be fulfilled or the EIA (and any decision based on it) may be open to challenge. Properly used, an EIA can be a tool to help us comply with our equality duty and as a record that to demonstrate that we have done so.

<sup>2</sup> **Our duties in the Equality Act 2010**

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As a council, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the impact and potential impact of our activities on all people with 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on what you are assessing, who it might affect, those groups' vulnerability, and how serious any potential impacts might be. We use this EIA template to complete this process and evidence our consideration

The following are the duties in the Act. You must give 'due regard' (pay conscious attention) to the need to:

- avoid, reduce or minimise negative impact (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- promote equality of opportunity. This means the need to: – Remove or minimise disadvantages suffered by equality groups – Take steps to meet the needs of equality groups – Encourage equality groups to participate in public life or any other activity where participation is disproportionately low – Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- foster good relations between people who share a protected characteristic and those who do not. This means: – Tackle prejudice – Promote understanding

**<sup>3</sup> EIAs are always proportionate to:**

- The size of the service or scope of the policy/strategy
- The resources involved
- The numbers of people affected
- The size of the likely impact
- The vulnerability of the people affected

The greater the potential adverse impact of the proposed policy on a protected group (e.g. disabled people), the more vulnerable the group in the context being considered, the more thorough and demanding the process required by the Act will be.

**<sup>4</sup> When to complete an EIA:**

- When planning or developing a new service, policy or strategy

- 
- When reviewing an existing service, policy or strategy
  - When ending or substantially changing a service, policy or strategy
  - When there is an important change in the service, policy or strategy, or in the city (eg: a change in population), or at a national level (eg: a change of legislation)

Assessment of equality impact can be evidenced as part of the process of reviewing or needs assessment or strategy development or consultation or planning. It does not have to be on this template, but must be documented. Wherever possible, build the EIA into your usual planning/review processes.

**Do you need to complete an EIA?** Consider:

- Is the policy, decision or service likely to be relevant to any people because of their protected characteristics?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?

How vulnerable are the people (potentially) affected? If there are potential impacts on people but you decide not to complete an EIA it is usually sensible to document why.

<sup>5</sup> **Title of EIA:** This should clearly explain what service / policy / strategy / change you are assessing

<sup>6</sup> **ID no:** The unique reference for this EIA. This will be added by Community Partnerships

<sup>7</sup> **Team/Service:** Main team responsible for the policy, practice, service or function being assessed

<sup>8</sup> **Focus of EIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the policy, practice, service or function?
- Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.

- 
- How does it fit with other services?
  - Who is affected by the policy, practice, service or function, or by how it is delivered? Who are the external and internal serviceusers, groups, or communities?
  - What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes or improvements, and what should the benefits be? • What do existing or previous inspections of the policy, practice, service or function tell you?
  - What is the reason for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

<sup>9</sup> **Assessment of overall impacts and any further recommendations**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy,
- Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

<sup>10</sup> **Action Planning:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.