



Meeting of the

TOWER HAMLETS COUNCIL

Monday, 5 December 2016 at 7.00 p.m.

A G E N D A

VENUE

Council Chamber, 1st Floor,
Town Hall, Mulberry Place,
5 Clove Crescent,
London E14 2BG

Democratic Services Contact:

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**TO THE MAYOR AND COUNCILLORS OF THE LONDON BOROUGH OF TOWER
HAMLETS**

You are summoned to attend a meeting of the Council of the London Borough of Tower Hamlets to be held in **THE COUNCIL CHAMBER, 1ST FLOOR, TOWN HALL, MULBERRY PLACE, 5 CLOVE CRESCENT, LONDON, E14 2BG** at 7.00 p.m. on **MONDAY, 5 DECEMBER 2016**

Will Tuckley
Chief Executive

Public Information

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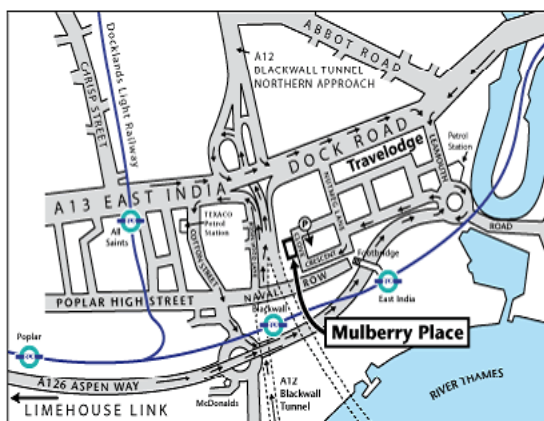
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LONDON BOROUGH OF TOWER HAMLETS

COUNCIL

MONDAY, 5 DECEMBER 2016

7.00 p.m.

PAGE
NUMBER

1. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS

1 - 4

To note any declarations of interest made by Members, including those restricting Members from voting on the questions detailed in Section 106 of the Local Government Finance Act, 1992. See attached note from the Monitoring Officer.

3. MINUTES

5 - 42

To confirm as a correct record of the proceedings the unrestricted minutes of the Ordinary General Meeting of the Council held on 21st September 2016.

4. TO RECEIVE ANNOUNCEMENTS (IF ANY) FROM THE SPEAKER OF THE COUNCIL OR THE CHIEF EXECUTIVE

5. TO RECEIVE PETITIONS

43 - 44

The Council Procedure Rules provide for a maximum of three petitions to be presented at an Ordinary Meeting of the Council.

The deadline for receipt of petitions for this Council meeting is noon on Tuesday 29 November 2016.

However at the time of agenda despatch, the maximum number of petitions has already been received as set out in the attached report.

6. TO RECEIVE WRITTEN QUESTIONS FROM MEMBERS OF THE PUBLIC

45 - 48

The questions which have been received from members of the public for this Council meeting are set out in the attached report. A maximum period of 20 minutes is allocated to this agenda item.

7. MAYOR'S REPORT

The Council's Constitution provides for the Elected Mayor to give a report at each Ordinary Council Meeting.

A maximum of five minutes is allowed for the Elected Mayor's report, following which the Speaker of the Council will invite the respective political group leaders to respond for up to one minute each if they wish.

8. TO RECEIVE WRITTEN QUESTIONS FROM MEMBERS OF THE COUNCIL 49 - 52

The questions which have been received from Councillors to be put at this Council meeting are set out in the attached report. A maximum period of 30 minutes is allocated to this agenda item.

9. REPORTS FROM THE EXECUTIVE AND THE COUNCIL'S COMMITTEES

9.1 Report from Cabinet: Gambling Policy 2016-19 53 - 108

To receive the report of the Chief Executive and Acting Corporate Director, Communities, Localities and Culture, proposing the adoption of a Gambling Policy for 2016/19.

9.2 Report from Cabinet: Community Safety Partnership Plan 2013-16 Year 4 (2016/17) 109 - 214

To receive the report of the Chief Executive and Acting Corporate Director, Communities, Localities and Culture, requesting that Council approve the Year 4 Plan (2016/17) of the Community Safety Partnership Plan 2013-16.

9.3 Report from Cabinet: Violence Against Women and Girls Strategy 2016-2019 215 - 388

To receive the report of the Chief Executive and Acting Corporate Director, Communities, Localities and Culture proposing the adoption of a Violence Against Women and Girls Strategy for 2016-19.

9.4 Report from Cabinet: Housing Strategy 2016 - 2021 389 - 588

To receive the report of the Corporate Director, Development and Renewal, proposing the adoption of the Housing Strategy 2016 – 19.

Note – this report was presented to Cabinet on 1 November 2016, it was subsequently amended and is now presented for agreement.

- 9 .5 Report from Audit Committee Treasury Management Mid-Year Report for 2016/17** **589 - 618**
- To receive the report of the Corporate Director, Resources providing the Treasury Management Mid-Year Report for 2016/17.
- 10. TO RECEIVE REPORTS AND QUESTIONS ON JOINT ARRANGEMENTS/EXTERNAL ORGANISATIONS (IF ANY)**
- 11. OTHER BUSINESS**
- 11 .1 Revised Code of Conduct for Members and Revised Arrangements for Dealing with Alleged Breaches of the Code** **619 - 646**
- To consider the report of the Acting Corporate Director, Law, Probity and Governance, in relation to proposed revisions to the Member Code of Conduct.
- 11 .2 Licensing Code of Conduct** **647 - 688**
- To consider the report of the Acting Corporate Director, Law, Probity and Governance updating the Licensing Code of Conduct.
- 11 .3 Notification of Amendment to the Executive Scheme of Delegation in respect of Grants** **689 - 710**
- To consider the report of the Acting Corporate Director, Law, Probity and Governance in relation to amendments made to the Executive Scheme of Delegation in respect of Grants decision making.
- 11 .4 Review of proportionality and allocation of places on committees and panels of the Council 2016/17** **To Follow**
- To receive the report of the Acting Corporate Director, Law, Probity and Governance reviewing the Council's proportionality and allocation of places on committees following the Whitechapel By-Election and other recent political group changes.
- The report will be published once the result of the Whitechapel By-Election is known.
- 12. TO CONSIDER MOTIONS SUBMITTED BY MEMBERS OF THE COUNCIL**
- The motions submitted by Councillors for debate at this meeting are set out in the attached report.

Agenda Item 2

DECLARATIONS OF INTERESTS - NOTE FROM THE MONITORING OFFICER

This note is for guidance only. For further details please consult the Members' Code of Conduct at Part 5.1 of the Council's Constitution.

Please note that the question of whether a Member has an interest in any matter, and whether or not that interest is a Disclosable Pecuniary Interest, is for that Member to decide. Advice is available from officers as listed below but they cannot make the decision for the Member. If in doubt as to the nature of an interest it is advisable to seek advice **prior** to attending a meeting.

Interests and Disclosable Pecuniary Interests (DPIs)

You have an interest in any business of the authority where that business relates to or is likely to affect any of the persons, bodies or matters listed in section 4.1 (a) of the Code of Conduct; and might reasonably be regarded as affecting the well-being or financial position of yourself, a member of your family or a person with whom you have a close association, to a greater extent than the majority of other council tax payers, ratepayers or inhabitants of the ward affected.

You must notify the Monitoring Officer in writing of any such interest, for inclusion in the Register of Members' Interests which is available for public inspection and on the Council's Website.

Once you have recorded an interest in the Register, you are not then required to declare that interest at each meeting where the business is discussed, unless the interest is a Disclosable Pecuniary Interest (DPI).

A DPI is defined in Regulations as a pecuniary interest of any of the descriptions listed at **Appendix A** overleaf. Please note that a Member's DPIs include his/her own relevant interests and also those of his/her spouse or civil partner; or a person with whom the Member is living as husband and wife; or a person with whom the Member is living as if they were civil partners; if the Member is aware that that other person has the interest.

Effect of a Disclosable Pecuniary Interest on participation at meetings

Where you have a DPI in any business of the Council you must, unless you have obtained a dispensation from the authority's Monitoring Officer following consideration by the Dispensations Sub-Committee of the Standards Advisory Committee:-

- not seek to improperly influence a decision about that business; and
- not exercise executive functions in relation to that business.

If you are present at a meeting where that business is discussed, you must:-

- Disclose to the meeting the existence and nature of the interest at the start of the meeting or when the interest becomes apparent, if later; and
- Leave the room (including any public viewing area) for the duration of consideration and decision on the item and not seek to influence the debate or decision

When declaring a DPI, Members should specify the nature of the interest and the agenda item to which the interest relates. This procedure is designed to assist the public's understanding of the meeting and to enable a full record to be made in the minutes of the meeting.

Where you have a DPI in any business of the authority which is not included in the Member's register of interests and you attend a meeting of the authority at which the business is considered, in addition to disclosing the interest to that meeting, you must also within 28 days notify the Monitoring Officer of the interest for inclusion in the Register.

Further advice

For further advice please contact:-

Melanie Clay, Corporate Director, Law, Probity and Governance, 020 7364 4800

APPENDIX A: Definition of a Disclosable Pecuniary Interest

(Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012, Reg 2 and Schedule)

Subject	Prescribed description
Employment, office, trade, profession or vacation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	<p>Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by the Member in carrying out duties as a member, or towards the election expenses of the Member.</p> <p>This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.</p>
Contracts	<p>Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority—</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
Land	Any beneficial interest in land which is within the area of the relevant authority.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer.
Corporate tenancies	<p>Any tenancy where (to the Member's knowledge)—</p> <p>(a) the landlord is the relevant authority; and</p> <p>(b) the tenant is a body in which the relevant person has a beneficial interest.</p>
Securities	<p>Any beneficial interest in securities of a body where—</p> <p>(a) that body (to the Member's knowledge) has a place of business or land in the area of the relevant authority; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.</p>

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LONDON BOROUGH OF TOWER HAMLETS

MINUTES OF THE COUNCIL

HELD AT 7.00 P.M. ON WEDNESDAY, 21 SEPTEMBER 2016

**THE COUNCIL CHAMBER, 1ST FLOOR, TOWN HALL, MULBERRY PLACE, 5
CLOVE CRESCENT, LONDON, E14 2BG**

Members Present:

Mayor John Biggs	Councillor Clare Harrison
Councillor Khaled Uddin Ahmed	Councillor Danny Hassell
Councillor Rajib Ahmed	Councillor Sirajul Islam
Councillor Ohid Ahmed	Councillor Denise Jones
Councillor Sabina Akhtar	Councillor Aminur Khan
Councillor Mahbub Alam	Councillor Rabina Khan
Councillor Shah Alam	Councillor Shiria Khatun
Councillor Amina Ali	Councillor Abjol Miah
Councillor Shahed Ali	Councillor Ayas Miah
Councillor Craig Aston	Councillor Harun Miah
Councillor Asma Begum	Councillor Md. Maium Miah
Councillor Rachel Blake	Councillor Mohammed Mufti Miah
Councillor Chris Chapman	Councillor Abdul Mukit MBE
Councillor Dave Chesterton	Councillor Muhammad Ansar Mustaqim
Councillor Gulam Kibria Choudhury	Councillor Joshua Peck
Councillor Andrew Cregan	Councillor Oliur Rahman
Councillor Julia Dockerill	Councillor Gulam Robbani
Councillor David Edgar	Councillor Candida Ronald
Councillor Marc Francis	Councillor Rachael Saunders
Councillor Amy Whitelock Gibbs	Councillor Helal Uddin
Councillor Peter Golds	Councillor Andrew Wood
Councillor Shafiqul Haque	

The Speaker of the Council, Councillor Khaled Uddin Ahmed in the Chair

During the meeting, the Council agreed to vary the order of business. To aid clarity, the Minutes are presented in the order that the items originally appeared on the agenda. The order the business was taken in at the meeting was as follows:

- Item 1 - Apologies for absence.
- Item 2 – Declarations of Disclosable Pecuniary Interests.
- Item 3 – Minutes.
- Item 4 – Announcements.
- Items 5 – Petitions.
- Item 5.4 - Petition debate and urgent motion regarding the Community Language Service

- Item 6 – Public Questions.
- Item 7 – Mayor’s Report.
- Item 8 – Members Questions
- Item 9. 1 - Report from Cabinet: Substance Misuse Strategy 2016-19
- Item 9. 2 - Annual Report to the Council by the Independent Person
- Item 11.1 - Treasury Management Quarterly Update Report for Quarter Ended June 2016
- Item 11.2 - The Roles of the Mayor and the Chief Executive and the delegation of powers
- Item 12.1 – Motion regarding the Housing and Planning Act

1. APOLOGIES FOR ABSENCE

Apologies for absence were received on behalf of:

- Councillor John Pierce
- Councillor Abdul Asad
- Councillor Suluk Ahmed

Apologies for lateness were received on behalf of Councillors Joshua Peck and Marc Francis.

2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS

Councillor Helal Uddin declared a Disclosable Pecuniary Interest in Agenda Item 5.2, Petition relating to Poplar HARCA parking. This was on the basis that the Councillor’s employer had a working relationship with Poplar HARCA. The Councillor left the meeting for the consideration of this petition.

Councillor Abdul Mukit MBE declared a Disclosable Pecuniary Interest in Agenda Item 5.4, Petition relating to cuts to community language services and Motion 12.2 on the same subject (not debated). This was on the basis that his wife was an employee of the community language service. The Councillor left the meeting for the consideration of the petition.

3. MINUTES

RESOLVED:

1. That the unrestricted minutes of the Council meeting held on 20 July 2016 be confirmed as a correct record and the Speaker be authorised to sign them accordingly.

4. TO RECEIVE ANNOUNCEMENTS (IF ANY) FROM THE SPEAKER OF THE COUNCIL OR THE CHIEF EXECUTIVE

The Speaker of the Council was delighted to announce that Councillor Oliur Rahman’s wife gave birth to their second child on Wednesday last week. On behalf of the whole Council, he passed on their many congratulations and best wishes to the whole family.

Mayor John Biggs referred to correspondence about an alleged child abduction in the Borough. He emphasised that it was not clear at this stage whether this incident had actually occurred as the Police had received contradictory reports. However, in any event, it was essential that the Council and schools safeguard children and managed any such incidents effectively.

5. TO RECEIVE PETITIONS

5.1 Petition relating Drug Dealing

Petition not presented due to the absence of the petitioner.

RESOLVED:

1. That the petition be referred to the Chief Executive and Acting Corporate Director, Communities, Localities and Culture, for a written response within 28 days.

5.2 Petition relating to Poplar HARCA parking

Doros Ullah addressed the meeting and responded to questions from Members. Mayor John Biggs then responded to the matters raised in the petition. Whilst acknowledging that responsibility for setting the parking charges fell outside the remit of the Council, the Mayor reported that he and ward colleagues had expressed concerns to the Chief Executive and the Chair of Poplar HARCA about the increase in the parking charges. He also reported that Poplar HARCA had indicated a willingness to review their position and the Administration would be making further representations to them again at that stage.

RESOLVED:

1. That the petition be referred to the Corporate Director, Development and Renewal for a written response within 28 days.

5.3 Petition relating to Old Ford Housing Association

John Forster addressed the meeting and responded to questions from Members. Mayor John Biggs then responded to the matters raised in the petition. He stated that he had met and exchanged correspondence with the Circle Housing Group and Affinity Sutton to discuss their plans to close the Old Ford Housing Association and centralise all services under its own management. He thanked all those involved in this work to date, especially Councillor Marc Francis for his efforts in dealing with the concerns and also for pushing for the outstanding repairs works to be carried out. The Administration would continue to escalate these particular concerns.

The Mayor considered that the proposed transfer conflicted with the Housing Association's duty to provide locally managed and accountable services. Accordingly, his Administration would be making representations to that end

and would be triggering the dispute resolution process of the Stock Transfer Agreement that covered some aspects of the concerns.

The Mayor also stated that he was willing to meet and work with the petitioners to secure a better outcome for the management of their housing and to ensure that the new landlord consulted the residents on their plans.

RESOLVED:

1. That the petition be referred to the Corporate Director, Development and Renewal for a written response within 28 days.

5.4 Petition Debate – Cuts to community language services

Jahed Chouddhury addressed the meeting on behalf of the petitioners. The Council then debated the matters raised by the petition and Councillor Asma Begum, Cabinet Member for Culture responded to the issues raised.

Procedural Motion

Councillor Asma Begum **moved** and Councillor Racheal Saunders **seconded**, a procedural motion “that under Procedure Rule 14.1.5, Rule 13.1 be suspended to enable an urgent motion regarding the Community Language Services to be considered”.

The procedural motion was put to the vote and was **agreed**

The Speaker adjourned the meeting at 7.50pm. The meeting reconvened at 8:00pm. The Speaker then adjourned the meeting again at 8:15pm and the meeting was reconvened at 8:30pm.

Councillor Asma Begum **moved**, and Councillor Rachael Saunders **seconded**, the urgent motion [text of motion as set out in the resolution below].

Following debate, the urgent motion as tabled was put to the vote and was **agreed**.

RESOLVED:

This council notes:

1. The passion with which community languages have been supported by committed groups in our communities. The CLS is provided through 50 projects and provides tuition for Bengali, Arabic, Somali, Arabic, Cantonese, Mandarin, Lithuanian, Vietnamese and Urdu.
2. That these classes are provided free of charge to local children in venues across the borough including primary and secondary schools, Idea Stores, local community centres, churches and mosques.

3. That the current budget for Community Language Services is £400,000 a year to fund admin costs and tutor hours. There is however a current overspend of £80,000.
4. That some projects also receive Mainstream Grant funding.
5. That the previous administration left a management system in chaos. A recent audit report raised serious concerns about the way the CLS was managed with regular overspending, poor reporting on what it was achieving and serious safeguarding concerns. We cannot ignore those findings.
6. That the Audit report gave the CLS the lowest rating of Nil as a result of its failing management. The investigation found:
 - Value for taxpayer money was not monitored
 - In some cases no evidence was recorded of students attending and there were no reports on performance.
 - There were no child protection policies in place at some providers
 - Payments were signed off without proper procedures and massive budget overspends.
 - DBS checks were expired and some personal information was unlawfully held.
7. That no change is therefore not an option.
8. That the Mayor understands that the CLS is important to many people in our community and wants to protect and develop it, in partnership with community organisations who support the service, and place it on a more sustainable footing.

This Council also notes that:

9. The Government have removed community languages from the list of accepted GCSEs. The Government have also proposed cutting funding for non-core subjects from next year – this will cut another £3.1m from Tower Hamlets' education budget. For this reason the current arrangement for the early GCSEs must end. The Mayor will look urgently at whether alternative provision can be secured. This is however likely to be difficult.
10. That the First Language Assessment service has not functioned for the past two years – it was stopped under the last administration - as many schools now have their own assessors and there was no demand.
11. That concerns have been expressed about the CLS being moved out of Children's services and into the Idea Stores community learning programme despite this change taking place under the previous administration and being introduced by Cllr Oliur Rahman.

This council believes:

12. That the failures of management identified in the Audit report, which happened under the previous administration, put children, tutors, taxpayer money and the whole CLS service at risk. This was a failure of a service provided to the community.

This Council resolves:

13. To welcome the Mayor's statement recognising the importance of community languages to our community.
14. To note the Mayors intention that the service be supported but recognising that to support the service it must change, in partnership with those who support it.
15. To work with all stakeholders, particularly parents and community groups to ensure that the Community Language Service is fit for purpose.
16. To work with community organisations to develop a service fit for the future and driven by the community.

6. TO RECEIVE WRITTEN QUESTIONS FROM MEMBERS OF THE PUBLIC

The following questions and in each case (except where indicated) supplementary questions were put and were responded to by the Mayor or relevant Executive Member:-

6.2 Question from Asik Rahman

I was very impressed with the Mela this year. How many people attended the event – and what other feedback has the Mayor had?

Response by Councillor Asma Begum, Cabinet Member for Culture

The Mela was indeed a very impressive event. I am proud that Mayor Biggs and I were able to return it, not only back to Banglatown, but also back to being a cultural and family friendly event rather than the overly-expensive and commercialised version run under the previous administration. We estimate that around 40,000 people attended this year's Mela. Those that came would have enjoyed a colourful parade down Brick Lane, amazing main stage acts by local and international artists. There was a catwalk and a family zone and a sport area.

(No supplementary question was put)

6.3 Question from Kevin Brady

When she became Prime Minister, Theresa May said she would tackle "burning injustice" and inequality. Has the Mayor, as leader of one of the most

deprived and unequal boroughs in the country, had any word from the Government to suggest they will stop the cuts to our council budgets?

Response by Mayor John Biggs

I think the indications so far are not good. I think every Prime Minister starts with a little bounce and a honeymoon and reaches out to everyone, but all the indications point towards Theresa May not being a great friend of local government. She doesn't appear to be a fan of the devolution agenda, is making noises about resisting mayors in other parts of the country (people may have mixed views about that) and I don't think she recognises that local government has been hit harder by spending cuts than other parts of the country and many, many very needy people depend on our services and that means that councils are having to make very hard decisions about how they balance their budgets with those tough decisions. Just to quote, or misquote, Ms May back at her, for her Brexit may mean Brexit, but it seems to me that, for her, fairness doesn't mean fairness in local government spending.

Supplementary question from Kevin Brady

It is clear that the government's austerity policies resulted in significant pressures on the Council's budget and you have had some difficult decisions about rate rises and cuts in services, but austerity has been about since 2010, whereas your administration is relatively new, could some of the impacts of the cuts have been mitigated if the previous administration had taken more decisive action?

Mayor John Biggs' response to the supplementary question:

In my view that's a very fair question and I'm disappointed that the Independent Group isn't here to hear it as they are an echo of the former Mayor. I think the answer is that, if you look up and down the country, virtually every other council has had to look carefully at its services, possibly restructure them, look at the needs of communities, make some tough decisions but do so in a balanced and reasoned way. In the case of Tower Hamlets it was a pretty shoddy process in my view, albeit with the advice of our professional officers, and it was in some cases too populist, opportunistic and didn't balance our services as well as it could have done which means that we have hard decisions to make now which are going to be tougher as a result of that. So I agree with your supplementary question.

6.4 Question from Adam Allnut

How many families in Tower Hamlets have been placed in temporary accommodation for over six weeks in each of the last five years?

Response by Councillor Sirajul Islam, Statutory Deputy Mayor and Cabinet Member for Housing Management & Performance)

It is unfortunate the housing crisis has had a detrimental effect on many families in our borough. Perhaps no more than those that have had to live in

bed and breakfast accommodation for extended periods of time. If I gave you the six-week overstay for the last five years I'd be here for a very long time and the speaker may not indulge me, but all the information is on the Council website as we have to report to government, but just as an example, last year at the point when Mayor Biggs was elected there were 232 families in this unfortunate position, today I am pleased to say there are none. So for the first time ever we are statutorily complaint. This is a tremendous achievement and one I am very proud of, however we understand that there is much more to do, most importantly we must ensure that we are building genuinely affordable housing that families need and doing all we can to increase standards in the private rented sector.

Supplementary question from Adam Allnut

As a young professional who has chosen to live in Tower Hamlets, obviously housing is a big cost to me. I am wondering what the Council has done to increase the provision of genuinely affordable private and housing association rental spaces, for people like myself.

Councillor Sirajul Islam's response to the supplementary question:

You may know that Mayor Biggs after being elected set up an affordability commission which was chaired by my colleague, Councillor Blake – and again, that report is available – which told us a mixed tenure of housing provision is what we need to provide in this borough. We are also consulting on a new Housing Strategy, again, you may know. On the 1st October we are holding a housing conference exactly to debate those issues so that we have a housing strategy that provides for the future for people like yourselves, for future generations. I really strongly urge you to come along to the housing conference to have that debate and also the impact the Housing and Planning Act will have on some of the plans we want to put forward. Mayor Biggs has pledged to build 1,000 Council homes in his manifesto which will be launching very soon, but that conference on the 1st of October is an opportunity for residents to contribute to the plans.

6.6 Question from Pete Dickenson

In the light of the Labour Party's new policy, under its leader Jeremy Corbyn, to prioritise the fight against austerity, will the Mayor and Council reconsider their policy of making massive cuts that hit the most vulnerable members of our community and reverse them? Will you also reverse the recent big rise in allowances for the Mayor, Cabinet members and the Leader of the Tory group, totalling £39,848, and use the money saved to reinstate the incontinence laundry service, which costs only £40,000 p.a.? The cuts already made have been extremely damaging, for example the closure of 18 out of 26 youth centres, Queen Mary Nursery (after promising to keep it open), NAFAS support and the £200K cut to CAMHS.

Response by Councillor David Edgar Cabinet Member for Resources

I think Jeremy is right that cuts are a choice, but they are a choice by national government. National government has options about the way they manage economies and the Conservative government has made decisions that means that we, over the next few years, will have to cut £58 million from our budget. The Labour Party is a party that is campaigning against many aspects of government policy. We on this side of the house campaigned against it as well, but we recognise that as a council we have a legal obligation to balance our budget, it is not one we can escape from. If we don't then we have commissioners. As we know, commissioners can come in and control, or the Director of Resources would have power to shape our budget.

We as a Labour Council have to make decisions and when we made those decisions last year we did a whole number of things that protected services that residents said they valued. We put money into things like tackling anti-social behaviour. We put decent wages into the hands of carers. We did a number of things I think really good aspects of that budget, but this year we are going to start on the process of saving £58 million over the next few years. We are going to put those proposals out to the wider world. People will be able to comment. They will be able to tell us what they think of those proposals and when it gets to the detail the service users will speak and we will listen very carefully to what is said.

On one particular point you are just completely wrong: the whole debate earlier on was one that was clear that we are not cutting the Community Language Service. So your starting point that we are cutting that is completely wrong. We are doing what we need to do, in a context that is not of our choosing, which we have a political opposition to, but we are trying to do it in a way that means we look at the support service that we have, we run them as efficiently as we can, we look at the frontline services that we have and we do all we can to protect them, to transform them and to make them work as well as they possibly can.

Supplementary question from Pete Dickenson

There is a very simple way that this Council can demonstrate that it is serious about fighting the cuts. You've cut £40,000 from the incontinence laundry service, a relatively small amount of money. At the same time you have increased the allowances for the Cabinet, the Mayor and the Leader of the Tory Group, by almost exactly the same amount of money. Without breaking any of the government's regulations in terms of spending you could easily reinstate the incontinence laundry service which, incidentally, is just pushing that cost on to the NHS which is absolutely running out of cash very rapidly. That's a very simple, perfectly legal thing that this Council could do and it would demonstrate that you are serious; that you don't just accept passively whatever is thrown at you by the Conservative government. So will you do that? A very simple thing that you could do without breaking any rules whatsoever.

Councillor David Edgar's response to the supplementary question:

Our response is not a passive response. As a party we campaign against the government, we challenge the government, we challenge it's economic philosophy, but as a Council we need to make a series of decisions that we have a legal obligation to. That is recognised by Jeremy Corbyn. To quote him in your question, as suggesting we should be doing something else is quite wrong. On the incontinence laundry service, that was a difficult decision last year. My understanding is that careful work is being done with all the people that received that service so if they need that service, arrangements will be made to ensure that they can.

On the point about the allowances that you raised, clearly allowances are a tricky issue for politicians, councillors, and Members of Parliament. There was an independent review in which we looked at and we only accepted one element of it, which was the amount of money to be paid for backbench councillors. In nine other categories we paid below, often way below, the amount that that independent review recommended and on the other five we were within the band. So I think we acted responsibly in response to that particular independent review and I think you have to look at the savings made last year in the round. Savings that incidentally were £8 million less than that had been planned by the Independent Group and ones where we took the decision to run down reserves by £10 million more than the Independent Group had been proposing earlier, in January 2015.

So I think we have done all we can to protect services in a way that people need, to recognise the vulnerabilities that many residents face and to be as responsible as we can in making very difficult decisions that result from a Tory government's choice.

6.8 Question from Kyrsten Perry

As a local resident, I saw how the previous Mayor's charges for bulk waste collection encouraged more people to fly-tip. How many people have benefited from the introduction of free bulk waste collection since it was introduced last year?

Response by Councillor Ayas Miah Cabinet Member for Environment

You are not alone in remembering the terrible damage that was caused by the previous Mayor's short-sighted decision to introduce charges for bulky waste. I am pleased to say that since Mayor John Biggs scrapped the charges last summer more than 13,500 free bulky waste collections have been made. This means more than one in ten households have used this service in just one year. There is always more we can do to improve the cleanliness of the streets, but I am proud that this one change has made such a big difference.

Supplementary question from Kyrsten Perry

What's the Council doing to help encourage local residents to recycle properly, because I live in Tower Hamlet and I find that not everybody knows

that you need to keep pink bags in the pink container. I even put, personally, signs up in my blocks saying 'let's help the Council because we are just wasting their time and money'. So I am thinking, what is the Council doing to help that?

Councillor Ayas Miah's response to the supplementary question:

Recycling is a big challenge for any council in an inner-London borough, especially Tower Hamlets, as we have such a high number of high rise buildings and narrow streets in Tower Hamlets, so we are trying our best. Last November, 2015, we sent every household a letter on how to use the recycling and there is a free recycling bag available at the Idea Stores. So we started campaigning and educating people to use the recycling bags, which is very beneficial for the Council, as it helps us reduce the cost and I think that we are dealing with housing associations as well on how they will participate to improve our recycling. So I would like to tell you, finally, we are doing our best and in future we will do more and, finally, we have a contract with Veolia and the contract will end very soon, so the next contract will be more concerned with how to improve our recycling.

Questions 6.1,6.5 and 6.7 were not put due to the absence of the questioners. Written responses would be provided to the questions. (Note: The written response is included in Appendix 'A' to these minutes.)

7. MAYOR'S REPORT

The Mayor made his report to the Council, referring to his written report circulated at the meeting, summarising key events, engagements and meetings since the last Council meeting.

When the Mayor had completed his report and at the invitation of the Speaker the Leader of the Conservative Group then responded briefly to the Mayor's report.

8. TO RECEIVE WRITTEN QUESTIONS FROM MEMBERS OF THE COUNCIL

The following questions and in each case supplementary questions were put (except where indicated) and were responded to by the Mayor or relevant Executive Member:-

8.1 Question from Councillor Andrew Cregan:

The recent independent report into electoral fraud highlights a number of positive changes we have made to tighten up our electoral systems. Does the Mayor agree that while we have taken important steps to guard against electoral fraud, it makes a mockery of our democracy that we still have councillors whose election was benefitted by 'corrupt and illegal practices'

Response by Mayor John Biggs:

Electoral fraud is a crime which affects everyone and I welcome any action

which helps to crack down on those who set out to steal an election. There were some useful suggestions in the report – some were less useful.

In Tower Hamlets we have made significant changes to tighten up our voting systems since 2014. I'm glad to see this report recognising that good practice and recommending many of those changes be adopted more widely.

The report makes clear that the previous Mayor and his colleagues' abuse of the electoral system was a criminal act.

What concerns me most is that not only was nobody prosecuted, but many of the candidates who benefitted from Lutfur Rahman's corrupt practices remain councillors in this chamber and remain unrepentant. In my opinion that is a disgrace.

The law should clearly be changed so that anyone benefitting from a corrupt election, particularly if they stand for a party which is then abolished because of that corruption, is removed from office or at least forced to re-run the election.

Supplementary question from Councillor Andrew Cregan:

Important work has been done but I would further commend your personal effort in cleaning up politics in this borough after the foul slurs and baseless attacks you were subjected to in 2014 by Tower Hamlets First. I would also commend the personal efforts of a member of the gallery who did far more than most at a great personal risk and did the borough an immeasurable service in delivering a post Lutfur Rahman era. So does the Mayor agree with me that this important task will only be fully complete when the rabble opposite, the shower of petulance are removed from this chamber permanently?

Mayor John Biggs' response to the supplementary question:

The answer to your question is yes. We do need to clean up the borough. We need to have people in this chamber who respect the rules of democracy, who respect each other in debate, who stand up without favour and any nervousness to champion the causes they passionately believe in. I think it is also important to say and you did mention that there might be someone in the public gallery, that we should pay our respect to the four petitioners who took the election petition and we should be alarmed by the headlines. If you read my written report, you will see that I am going to write to the Prime Minister about this, because I think there is an irregularity where people win a contest and then face potential bankruptcy. I think there is a serious problem with how the law works and we should as a borough pay great respect to those who put themselves on the line to challenge the bad malpractice in this borough.

8.3 Question from Councillor Sabina Akhtar:

Could the Cabinet Member for Environment list what awards our parks in Tower Hamlets have achieved?

Response by Councillor Asma Begum, Cabinet Member for Culture:

Meath Gardens recently joined Victoria Park, Mile End Park and seven other parks in the borough by earning its first Green Flag Award.

This year Tower Hamlets Council retained all of its Green Flags, and now with Meath Gardens, it brings the number of Green Flag parks in the borough to 10. This is the highest number the borough has ever had.

We have yet to hear the results from London in Bloom but last year the Borough did exceptionally well and as a result was nominated for Britain in Bloom which we will hear the results of later this year.

(No supplementary question was put.)

8.4 Question from Councillor Julia Dockerill:

Following the decision by the Mayor in Cabinet to make permanent the borough wide 20mph speed limit, will he explain exactly how this is to be enforced, as currently pedestrians, cyclists and motorists face safety problems from those who choose to ignore the limit due to the lack of enforcement?

Response by Councillor Mayor John Biggs:

I wanted to answer this question personally as I made a personal decision to confirm this policy for the time being, unless another administration changes this, as the permanent rule in this borough. I think 20 is plenty is a good slogan. I think it is also quite powerful and useful that when people travel on a road with a yellow line in towns they know that the speed limit is 20 mph. I think consistency is something that is important. So I am committed to making the streets safer and making the limit permanent is one important part of that and while it is early days the signs are encouraging with the number of fatal and serious collisions over the first nine months of the trial period down by 20 and 22 per cent respectively. We will monitor that and will invest in the roads where the inclination of drivers is to break that speed limit. I think a lot of people feel anxious and quite often we are hypocrites in our lives and we like getting places quickly. We actually want the streets we live on to be quiet and peaceful where people respectfully defer to the interests of vulnerable road users such as pedestrians, cyclists and those who are younger or physically less able than ourselves.

Supplementary question from Councillor Julia Dockerill:

Would the Mayor encourage the Police to undertake a series of night-time enforcement operations in areas where boy racing is a particular problem such as Wapping and Glengall Grove and other place on the Isle of Dogs?

Mayor John Biggs' response to the supplementary question:

Absolutely and I know it's a problem in Wapping where you and I live and I know that there is a particular problem in Westferry. The Police do need to take a greater interest. Obviously we do need more Police on our streets for this to happen. I do notice when Islington first introduced the 20 mph limit the Police more or less said that there were not going to enforce it. But now I find, not by personal experience as a driver but through people that I might know, that they have been stopped by the Police when travelling above the limit in a 20mph zone. The Police I think are taking the limit seriously as they recognise that by enforcing good behaviour in the Borough and making clear that we expect people to behave properly, we are helping to create a more civilized and safe place for everyone. It's a sort of a version of broken windows perhaps broken tyres.

8.5 Question from Councillor Rajib Ahmed:

Can the Cabinet Member for Children's Services update the Council on the recent school exam results?

Response by Councillor Rachael Saunders, Deputy Mayor and Cabinet Member for Education & Children's Services:

There are two issues where we are giving you a really clear answer. One is that the way in which the results are measured has changed this year. So it's not possible to compare like for like. The other is that two schools haven't yet chosen to give us their results – Mulberry and what was until recently the Bethnal Green Academy. My understanding is that their results are good so they should not pull the averages down.

On the new measure, secondary exam results, GCSEs were sound and consistent with last year's results in the context of a national decline in results. So we are continuing to do really well where others are doing less well. Post sixteen performance is the same situation. Our average grade at A Level is now C so that's a steady improvement over the last four years. But I think you would all agree that we would like to be doing much better than that and this is an area where there is more to do.

Vocational subjects also demonstrated an improvement and each entry now averages a good distinction grade. So really good results but more to do post sixteen.

We should congratulate all parents, teachers and young people for those achievements. On Key Stage 1 and 2, there were also excellent results. Well above the national average and importantly people with special education needs did better at Stage 1 than the national average which is really important to us as well.

(No supplementary question was put.)

8.7 Question from Councillor M. Abdul Mukit MBE:

Members may be aware that the Mayor of London, Sadiq Khan, has launched a review of Boris Johnson's cuts to London's Fire Service. Does the Mayor welcome this review?

Response by Mayor John Biggs:

I should note that within our chamber there is a Member of the Fire Authority, Councillor Amy Whitelock Gibbs who has been appointed to represent all of the London Council's on behalf of the Labour Party. So she will be flying the flag for Tower Hamlets as part of that. I welcome the review. Since 2009, London's Fire Service has seen its funding cut by more than £150m, with 10 fire stations closed, 27 fire engines axed and over 500 firefighters put out of jobs.

Before leaving office, Boris Johnson set the Brigade's current budget, cutting a further £22m over the next three years. So it's important that the new Mayor reviews that. As a result of Boris Johnson's cuts, we lost Fire Engines in Tower Hamlets at Whitechapel and we lost an entire station at Bow. The review of fire station cuts will be led by Anthony Meyer, the former Chief Executive of the Greater London Authority.

Cutting the number of fire fighters only increases the response times of the local fire services. In the case of Bow, we saw a dramatic increase in response times which means that when a fire does break out you should be a little concerned that the fire service will not get there in a quick time and a house fire quite often spreads quickly. We need to be sensitive to that. So I welcome the review and I want us to submit evidence to it so we can help strengthen the case for good fire service for our citizens in Tower Hamlets.

Supplementary question from Councillor M. Abdul Mukit MBE:

Did you attend the re-opening of the Shadwell fire station?

Mayor John Biggs' response to the supplementary question:

Yes I did. I met Prince Charles who I had not met before and it was a less surreal experience than I expected it to be and I mean that very respectfully. It was also attended by the Deputy Mayor of London, Joanne McCartney and Councillor Amy Whitelock Gibbs. So we opened the new state of the art facility which I feel shows some confidence in our fire service in the Borough. It is an excellent facility which will also be focusing on community safety initiatives. It's just down the road from Bluegate Fields which was burnt down by an arson attack about 20 years ago which we thought was local youngsters. So community engagement in fire safety, making sure that people are safe in their homes, making sure vulnerable people are protected as well, is all part of the work of the fire service and a new fire station in Shadwell is a very important addition that will help that to happen.

8.8 Question from Chris Chapman:

Would the Mayor comment on Lincoln Plaza, on the Isle of Dogs, being crowned winner of the 2016 Carbuncle Cup for worst new building in the UK? It was described by the judges as: the “architectural embodiment of sea sickness, waves of nausea frozen in sheaths of glass and coloured aluminium that, when stared at for too long, summon queasiness, discomfort and, if you’re really unlucky, a reappearance of lunch as inevitably as puddles after a rainstorm?”

Response by Councillor Rachel Blake, Cabinet Member for Strategic Development:

I am sure you work really hard on the Development Committee striving for high quality design in all new developments. You probably know that this was publically nominated but determined by a Panel of judges who have chosen this to be the carbuncle this year.

Supplementary question from Councillor Chris Chapman:

Is it not the fact that this award is a very sorry indictment of this administrations and its predecessor’s total lack of regard for the people on the Isle of Dogs. As a Member of the Development Committee, I am afraid I do see firsthand on many occasions the sheer level of dissatisfaction and exasperation for the people that live there that we always seem to be the ones that get the most ugly, carbuncle and nauseating buildings without the necessary infrastructure with poor construction planning that has an impact on local people and shows no real understanding. It is only because of the work of my colleague Councillor Andrew Wood under a Conservative party policy which is introducing local planning forums as part of its Localism Act, that we are actually seeing any action, certainly none from you.

Councillor Rachel Blake’s response to the supplementary question:

So I will answer your question and will also address the slightly more constructive question that came from one of your ward colleagues Councillor Ronald. You will be thrilled to hear Councillor Ronald that the urban design capacity within the Council’s Planning service has recently been strengthened with a view to maintaining a robust approach to high quality development design standards going forward. New members have also been invited to join the Council’s design panel, which I know you are particularly interested in, with a view to reinvigorating it and its role in terms of determining our contributions on the design of buildings.

I should also say and Councillor Chapman you will not be surprised to hear this, as you talk so much with Councillor Andrew Wood, that the Local Plan Review is underway and opportunities to strengthen existing policies will be considered within that process. I would also add that the idea that the Conservatives were the first to think about the involvement of local people in planning is absurd and if you want to talk more about what the Labour

Government did to consult people on local plans before they were action plans, I would be very happy to sit down with you and explain it to you.

I would also like to draw your attention to buildings in Tower Hamlets that have been commended for excellent design to highlight that picking on this award is a rather silly way to talk about design. We have got St Andrews in Bromley by Bow, the Peabody Estate in Shadwell, St Paul's school in Poplar that have received awards. They are not on the Isle of Dogs but if you want me to seek out designs in that area then, when we have the meeting on planning policy, I can draw them out.

8.9 Question from Councillor Helal Uddin:

Can the Mayor or Cabinet Member set out what measures the Council is taking to tackle anti-social behaviour?

Response by Councillor Shiria Khatun, Deputy Mayor and Cabinet Member for Community Safety:

The Mayor takes all queries around anti-social behaviour very seriously and as a result has commissioned an ASB strategy which we have not had before and we don't have now. This strategy will be looking at a coordinated approach to deal with the growing number of concerned residents that have come to us to report ASB.

I will talk very briefly about some of the Council activities involving intervention. We encourage residents to report ASB through using the 101 number and if it's an emergency to call 999. We also have the fortnightly ASB tasking group. This is a partnership group and areas are tasked to include ASB housing officers, Drug and Intervention Project workers, the Police Task Force, Tower Hamlets Enforcement Officers and Rapid Response. They are then aligned to carry out tasks that have been agreed by the group.

I mentioned the Police Task Force team, that is something that the Mayor commissioned earlier this year and this particular group of police officers work with dealing with street prostitution and drug related issues. We also have now completed twenty action plans in each of the areas in Tower Hamlets that are updated on a quarterly basis.

Supplementary question from Councillor Helal Uddin:

As the Mayor touched on earlier in his announcement about a particular incident in the Bromley North/South area, would the Lead Member be in a position to make sure that the CCTV in the area concerned is being operating effectively and to also ensure that the Police visibility is increased. Obviously the Council has a responsibility and residents will be approaching us for information so I would like a response from the Leader Member, if not tonight but after the meeting would be helpful.

Councillor Shiria Khatun's response to the supplementary question:

The Mayor has actually gone one step further and has met up with the Borough Commander to talk about this particular incident that you have referred to. One of the things that we do encourage and this is something that the Mayor has done so through the Director of Children's Services is for schools to report any such incidences to the Police directly and to dial 999. As for CCTV cameras this is something that we will be looking at and as I mentioned the Mayor has already gone a step further and carried out quite a bit of work already.

8.11 Question from Councillor Denise Jones:

Residents frequently raise concerns about 'boy racers' in Wapping, and the increasing use of nitrous oxide across the borough. What steps are being taken by the Council, working with the police, to tackle these problems?

Response by Councillor Shiria Khatun, Deputy Mayor and Cabinet Member for Community Safety:

We are very aware of this particular problem, it is something that was raised at the mayoral assembly as well as the Safer Neighbourhood Boards question time.

One of the things that the Council has recently done is purchased something called the speed gun, which some Councillors have actually used. We did actually put out in the members bulletin if any other Councillors are interested in this to take this offer up. Another thing we are also doing is looking at ways to tackle laughing gas. This is something that we get a lot of residents coming up to me, particularly women, in my surgery talking about this particular problem. It is something that the Council is working proactively with the Police to come up with a solution. It is a tricky one, but it is something that the Mayor and I are taking very seriously and hopefully soon we will come up with a solution to alleviate this particular issue.

Supplementary question from Councillor Denise Jones:

I think it will be difficult enforce a ban or monitor the use of the substance because it is right across the borough, particularly in areas like Brick Lane, where we have the nightlife and so on and it is not just our residents that are leaving those deposits or using it.

Heavy use can cause anaemia and it takes away critical vitamins from your body and can go on to cause nerve damage and if it is not used with a balloon, but is used with masks and things like that, it can actually cause death, although there have not been that many examples of things like that in this country. So will the Mayor or you consider working with the Council's partners in the NHS and the Police to run a credible information campaign that stresses the dramatic differential in risk between the different forms of administering the canisters of laughing gas, as well as highlighting the health issues associated with its use?

If we can put out some sort of publicity about the dangers of it – I don't for one minute believe that as people are buying it they are going to read leaflets or anything – but we just need to get that message out that prolonged use can be very dangerous.

Councillor Shiria Khatun's response to the supplementary question:

Can I just reiterate, yes, the Mayor is taking this issue very seriously and not only are the Mayor and I working with the Police, but also with the rest of our partners from the Community Safety Partnership as well as our health friends, to look at a way in dealing with this particular problem.

8.12 Question from Councillor Andrew Wood:

Will the Mayor be encouraging support for the four residents who led the successful election petition who face financial problems due to the failure of former Mayor, Lutfur Rahman, to pay his court debts?

Response by Councillor Mayor John Biggs:

[The meeting was referred to the statement on election petitioners from the Mayor's Report, considered at Item 8 of the agenda. The extract is replicated below.]

“Election Petitioners: I am of course here following the election petition, disqualification of my predecessor and subsequent by-election. It distresses me that following the success of their challenge they now face ruinous legal bills. I will be writing urgently to the Prime Minister on this matter, as it appears to defy the rules of natural justice that this should happen.”

Supplementary question from Councillor Andrew Wood:

Quite a few residents have written to me and asked this question: why does the Council itself not clear the debts of the four petitioners, who are in the public gallery tonight, as it has benefited financially from the better governance since the removal of Lutfur Rahman?

One thing I think we could help them with is that they have launched a funding appeal online and I think that it would be good if all of us present in this room tonight could try and re-Twitter that appeal and try and spread their message as widely as possible in our own communication with our own residents. To try and make as many people in Tower Hamlets aware that they can go online and, very quickly, in a minute or two, donate even a small amount of money to these people that have helped us so much.

Mayor John Biggs response to the supplementary question:

That is an intriguing question, to which I do not know the answer. I guess it would not ordinarily be the case that the Council would pay other people's

legal fees unless it was party to the action, but I don't really know the answer or the legalities, but I am very happy to go away and look at that as a possibility, as I feel a public service has been performed. Obviously I have a self interest in saying that, as it allows me to spend glorious hours in your company Councillor Wood, but nevertheless it has been a public service for the greater good than just that.

I agree with [the proposal to promote the petitioners' online funding appeal] and would love it if we had the power to levy the Independent Group to help with this as I feel they played more than a simple contributory part to the circumstances in which we find ourselves in and the petitioners as well. I am planning to write to the Prime Minister on this as I think it is a very important issue. I am happy to do so alongside the leader of your group if that is helpful and if you wanted to be party to that, because I think there is a fundamental issue here. It is the sort of issue which will tend never to be at the top of the list in terms of parliamentary time, but it is a fundamental injustice if people make a sacrifice like this they are not in some way indemnified for their risk.

8.13 Question from Councillor Danny Hassell:

Can the lead member please update the council on the steps that have been taken to campaign for access to Pre-Exposure Prophylaxis, (PrEP) for residents of Tower Hamlets who are at greatest risk of HIV?

Response by Councillor Amy Whitelock-Gibbs, Cabinet Member for Health & Adult Services:

As you know, the campaign around PrEP is something I have taken a personal interest in and I am pleased to report that we have been proactive locally both in engaging with the national campaign and ensuring local residents are informed. Last month, I called publicly for confirmation that local residents who have been receiving PrEP as part of the local trial will have their drugs extended. I am pleased to report three key developments:

- Unfortunately NHS England have appealed the judicial review decision, but the local Government Association is now engaging with councils, including us, in relation to that appeal;
- The participants in the PROUD study, locally and across the country who have been involved in those trials – we have just had confirmation recently that the manufacturers of that drug will extend provision of the drug for a further six months, which is really good news and I am glad they have responded to calls from charities and from local councillors like me to do that and thirdly;
- NHS England are now consulting on a future commissioning policy for PrEP (despite the fact that they also are challenging the appeal). We've been promoting that consultation and it would be great if Members could support us in promoting that to local residents.

Supplementary question from Councillor Danny Hassell:

Can I join campaigners in thanking you and the Mayor for the leadership you have shown on this issue, particularly in lobbying for the drug to be made available to those who are on the trial. Can the lead member confirm that the Council will continue to do all it can to support organisations who are campaigning and lobbying for this through the support of the information given from the LGA etc?

Councillor Amy Whitelock-Gibbs' response to the supplementary question:

We will continue to engage with this important issue and I want to pay tribute to the national charities that have been really leading this work and to the LGA that have been representing councils as well.

Questions 8.2, 8.6, 8.10 were not put due to the absence of the questioners. Questions 8.14 - 25 were not put due to lack of time. Written responses would be provided to the questions. (Note: The written responses are included in Appendix 'A' to these minutes.)

9. REPORTS FROM THE EXECUTIVE AND THE COUNCIL'S COMMITTEES**9.1 Report from Cabinet: Substance Misuse Strategy 2016-19**

The Council considered the report of the Chief Executive (and Acting Corporate Director, Communities, Localities and Culture) submitting the proposed Substance Misuse Strategy 2016-19 for approval.

The recommendations set out in the report were put to the vote and were **agreed**. Accordingly it was:

RESOLVED:

That the Council note:

1. That the Substance Misuse Strategy 2016-2019 is part of the Crime and Disorder Reduction Strategy in Tower Hamlets (the Community Safety Plan);
2. That as the Substance Misuse Strategy 2016-2019 is part of the Crime and Disorder Reduction Strategy then pursuant to the Council's Budget and Policy Framework Procedure Rules, the Mayor as the Executive has responsibility for preparing the draft strategy for submission to the full Council to adopt;
3. That the draft Substance Misuse Strategy 2016-2019 and Action Plan have been approved by strategic partners for adoption by their respective organisations;

4. That at the Cabinet meeting on 26th July 2016 the Mayor approved the draft Substance Misuse Strategy 2016-2019 and recommended it to full Council for adoption;

That the Council approve:

5. The adoption of the Substance Misuse Strategy 2016-2019

9.2 Annual Report to the Council by the Independent Person

The Council considered the Annual Report for 2015/16 of the Independent Person appointed in accordance with the provisions of the Localism Act 2011.

The recommendation set out in the report was put to the vote and was **agreed**. Accordingly it was:

RESOLVED:

1. To note the content of the report.

10. TO RECEIVE REPORTS AND QUESTIONS ON JOINT ARRANGEMENTS/EXTERNAL ORGANISATIONS (IF ANY)

There was no business to transact under this agenda item.

11. OTHER BUSINESS

11.1 Treasury Management Quarterly Update Report for Quarter Ended June 2016

The Council considered the report of the Corporate Director, Resources in respect of treasury management activities for the quarter ending 30 June 2016.

The recommendations set out in the report were put to the vote and were **agreed**. Accordingly it was:

RESOLVED:

1. That the Council note the contents of the treasury management activities and performance against targets for quarter ending 30 June 2016;
2. That the Council note the Council's investments which are outstanding as at 30 June 2016 as set out in Appendix 1 of the report. The balance outstanding at that time was £452.95m which includes £73m, pension fund cash awaiting investment in early July;

3. That the Council agree to increasing investments over a year monetary limit from £50m to £100m as set out in section 3.12.3 of the report.
4. That the Council approve increasing monetary limit and duration of part nationalised banks from £25m and 3 years to £50m and 5 years as set out in section 3.12.4 of the report.

11.2 The Roles of the Mayor and the Chief Executive and the delegation of powers

The Council considered the report of the Acting Corporate Director, Law Probity and Governance and Deputy Monitoring Officer proposing changes/clarifications to the Constitution in relation to the powers and duties of the Mayor and Chief Executive.

The recommendations set out in the report were put to the vote and were **agreed**. Accordingly it was:

RESOLVED:

1. That the Council note and approve the additional clarity to the roles of the Mayor and the Chief Executive;
2. That the Council agree the proposed constitutional changes set out in paragraphs 3.8 to 3.13 and Appendices 2 to 4 of the report and that the Constitution be revised accordingly.

12. TO CONSIDER MOTIONS SUBMITTED BY MEMBERS OF THE COUNCIL

Procedural Motion

Councillor Danny Hassell **moved** and Councillor Rachael Saunders **seconded**, a procedural motion “that under Procedure Rule 14.1.3 the order of business be varied as follows:

- Item 12.1 - Motion regarding the Housing and Planning Act.
- Item 12.4 - Motion regarding Increasing Organ and Blood Donation in Tower Hamlets.
- Item 12.6 - Motion regarding Electoral Petition Costs.
- Item 12.3 - Motion regarding the 2016 Carbuncle Award.
- Item 12.7 - Motion regarding pollution near schools.
- Item 12.5 -Motion regarding the future of the Tower Hamlets Youth Service.

The motion was put to the vote and was **agreed**.

12.1 Motion regarding the Housing and Planning Act

Councillor Andrew Cregan **moved** and Councillor Sirajul Islam **seconded** the motion as printed in the agenda.

Following debate, the motion was put to the vote and was **agreed**. Accordingly it was:

RESOLVED:

This Council Notes that:

1. The Housing and Planning Act ('the Act') received Royal Assent on 12th May 2016.
2. The Council debated and supported a motion (20th January 2016) which called on the Mayor and all Councillors to actively campaign to highlight the disastrous consequences of the then Bill; and called on the Mayor to give full consideration to finding meaningful, genuinely affordable housing solutions for Tower Hamlets.
3. The Mayor and/or Cabinet Members have subsequently attended public meetings organised by 'Kill the Bill' on the Cranbrook, Collingwood, Ocean estates and outside Albert Jacob House and confirmed their commitment to attend others as invited.
4. LBTH Officers have attended public meetings on Collingwood and Ocean estates to set out the technical aspects of the Act.
5. The Mayor launched the Housing Strategy consultation which closed on 31st July
6. East End Life, Our East End, and 24 Hour Housing have all published articles setting out the Mayor's opposition to this Act and his response to the impact.
7. An all members briefing on the Draft Housing Strategy including the impact of the Housing and Planning Act was held on 2nd June 2016.
8. The Housing and Regeneration Mayors Question Time in Poplar included an officer briefing for residents on the Housing and Planning Act.
9. An article in THH newsletter and information has been circulated to all RPs for their newsletters.
10. The Tower Hamlets website features a detailed summary of the Act and the impact on Tower Hamlets at http://www.towerhamlets.gov.uk/ignl/housing/Housing_and_Planning_Act.aspx

11. LBTH has responded to Government consultations on details of the Act and responses are available at http://www.towerhamlets.gov.uk/ignl/housing/Housing_and_Planning_Act.aspx
12. In order to fully prepare for the impact of the Act, further guidance is required from Government regarding the implementation.
13. The Council is organising a Housing Strategy Conference for residents on 1st October 2016 to discuss the Council's future Housing Strategy, responding to the Housing and Planning Act.

This Council believes that:

1. The Housing and Planning Act represents a Conservative attack on the diverse communities in Tower Hamlets and it will significantly impede the council's ability to provide adequate affordable housing for families in the borough.
2. The Tory 'Pay to Stay' policy will drive up rents and have a devastating effect in Tower Hamlets.
3. The Government should publish guidance on the implementation of 'Pay to Stay' and 'Sale of High Value Voids' to allow Councils to fully prepare.

This Council calls on:

1. The Mayor to write to the Minister of State for Housing and Planning setting out the impact of the uncertainty over the Act.
2. Our local Labour MPs to raise questions in Parliament about how the Act will be implemented and how it will impact Tower Hamlets.

Motions 12.2 -12.7 were not debated due to lack of time.

The meeting ended at 10.20 p.m.

Speaker of the Council

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APPENDIX A – WRITTEN RESPONSES TO QUESTIONS THAT WERE NOT PUT AT THE MEETING

6.1 Question from Alan Haughton

Following Mayor Johns Biggs public support of a Heathrow Third Runway, can the Mayor confirm if this is a personal view or the view of Tower Hamlets Council? Can the Mayor also confirm that if a Heathrow Third Runway is built, will Tower Hamlets be overflowed more or overflowed less with the additional runway, than it is currently?

Response of Mayor John Biggs

I can confirm that it is my personal view that Heathrow should be expanded, and a third runway should be built. Tower Hamlets does not have a policy on Heathrow, though a policy does exist in relation to City Airport, from where morning and night flights in particular cause significant nuisance.

It is of course likely that a new flight path would emerge, and I understand that that may affect the north west portion of the borough, but that the height of aircraft at this point of the descent would be such that there would be little or no effect on residents.

There will of course be other negative consequences – including air quality, and increased carbon emissions. But this must be balanced against the economic impact on our city of not having sufficient air capacity for our city to remain competitive – something which is even more important following Brexit – as well as the thousands of jobs, investment, and improved infrastructure that would also result.

6.5 Question from Charlotte Norton

Can the Mayor tell me whether or not the residents' data has been recovered after it was illegally acquired from Tower Hamlets Homes and used in the previous mayoral election by the Tower Hamlets First candidates?

Response of Mayor John Biggs

Despite an investigation finding that the confidential contact information of almost 6,000 residents was illegally leaked from Lutfur Rahman's office to his political party Tower Hamlets First the information has not been recovered.

6.7 Question from Lillian Collins

Why did the current Mayor John Biggs fail to acknowledge the hard work of residents who campaigned hard for the Poplar Baths project, as well as the former Mayor Lutfur Rahman and his Deputy Mayor at the Poplar Baths launch event as without their effort it wouldn't have happened?

Response of Mayor John Biggs

I was very pleased to be able to open the new Poplar Baths in August. Maybe you missed my speech but I am happy to report I did indeed recognise the contribution of local campaigners and am more than happy to repeat that praise now. In what must have been a moment of weakness I can report I even recognised the role of the previous Mayor, though not admittedly the former Deputy Mayor.

Poplar Baths was definitely a victory for local residents which I welcome. That said I don't necessarily welcome the way the previous administration went about it, resorting to incredibly expensive PFI deals to fund the development and signing the council up to increasing costs for years to come.

8.2 Question from Councillor Oliur Rahman

Can the Mayor provide an update on the motions passed by the Council Chamber since 2010 with a breakdown of how many were implemented and/or remain outstanding since 2013, with a percentage breakdown for each year?

Response of Mayor John Biggs

As the Councillor chose to walk out of this meeting of Full Council, it is disappointing that he was not present to properly ask this question on behalf of the residents who elected him to represent them. A written reply is below:

The number of motions passed each municipal year is as follows:

2010/11 – 21
2011/12 – 33
2012/13 – 20
2013/14 – 28
2014/15 – 15
2015/16 – 15
2016/17 – 1

More detailed analysis shows that since 2013/14 there have been 59 motions, of those 39 are marked complete, 16 are in action or partly complete and 4 are incomplete.

8.6 Question from Councillor Mahbub Alam

Has current mayor of Tower Hamlets John Biggs written to Labour's new Mayor Sadiq Khan of London asking him to save the people of Tower Hamlets from the dreadful plans which the developers have for Bishopsgate Goods Yard?

Response of Councillor Rachel Blake (Cabinet Member for Strategic Development)

As the Councillor chose to walk out of this meeting of Full Council, it is disappointing that he was not present to properly ask this question on behalf of the residents who elected him to represent them. A written reply is below:

The planning application, originally submitted to Tower Hamlets and Hackney Council's to develop Bishopsgate Goods Yard was called in by the former Mayor of London, Boris Johnson on 23rd September 2015 for his determination. A planning hearing was scheduled for 18th April 2016. The GLA planning officers prepared a report which recommended that permission be refused. On 13th April 2016 the former Mayor confirmed that the hearing would not take place, to allow the developer the opportunity to amend the application and address the proposed reasons for refusal.

On 23rd June 2016 senior officers at Tower Hamlets and Hackney wrote jointly on behalf of both councils and their respective Mayor's to the GLA noting that the changes required to the proposals would need to be substantial in order to address the boroughs' and the GLA officers objections. The letter also formally requested that the Mayor return the application to the two boroughs for their determination. In addition the Mayor, both in his role as Mayor of Tower Hamlets and in his previous GLA role, repeatedly lobbied against the Goodsyards scheme.

We understand that the GLA are considering the request and are taking legal advice on whether the application could be returned. At this stage the application is in abeyance and no formal decisions have been made on the application. There is therefore no immediate need to lobby Sadiq Khan on this issue.

8.10 Question from Councillor Ohid Ahmed

The current Mayor was made aware of unacceptably high increase in parking charges by Poplar Harca and how strongly the residents who are affected felt about this unjust and high level of increase. Can the Mayor confirm if Poplar Harca is treating freeholders and leaseholders differently and whether or not, and if, the issue has now been resolved?

Response of Mayor John Biggs

As the Councillor chose to walk out of this meeting of Full Council, it is disappointing that he was not present to properly ask this question on behalf of the residents who elected him to represent them. A written reply is below:

The Mayor and various Ward Councillors have continued to liaise with Poplar HARCA around their proposed parking increases as they affect Poplar HARCA properties. Freeholders are not Poplar HARCA residents and their properties are not Poplar HARCA properties, therefore we are advised that

they would not be considered for the same concessions in the parking scheme as a leaseholder.

Following representations by the Council, the Board of Poplar HARCA has approved a revised parking scheme that lessens the financial impact on residents as follows:-

	Tenants and resident leaseholders	Others living at PH address	Others
2008	£1.49	£1.79 (incl VAT)	£3.50 (incl VAT)
2015	£1.96	£2.35(incl VAT)	£7 (incl VAT)
2016 (proposed)	£7	£15 (incl VAT)	£15 (incl VAT)
2016 (revised)	£4	£15 (incl VAT)	£15 (incl VAT)

Although these revisions are more reasonable than those previously outlined, I will continue to monitor the feedback from residents which will be a crucial determinant as to whether any further intervention is required by the Council. The HARCA have advised that the matter will be considered again by the Board in the near future. They are very aware of our opposition to these increases.

8.14 Question from Councillor Muhammad Ansar Mustaqim

Residents of Northesk House, Tent St E1 signed a petition and submitted to the current Mayor. John Biggs responded to elected local councillor that the Council will set up a meeting on 1 August for local residents to discuss the issue. However, that letter was sent to the local councillor after 16 August (more than 2 weeks after the actual meeting). I checked with residents who signed the petition and majority don't seem to know anything about the meeting arranged. Can the current mayor explain why such incidents are becoming a regular theme in his mayoralty?

Response of Councillor Ayas Miah (Cabinet Member for Environment)

As the Councillor chose to walk out of this meeting of Full Council, it is disappointing that he was not present to properly ask this question on behalf of the residents who elected him to represent them. A written reply is below:

Your assertion is factually incorrect. The response was sent to you by my office on 28th July. The letter stated that 'a site meeting is set for Monday 1st August at 10.00am with a local Councillor to discuss the parking issues'. I understand this meeting had been arranged with you directly by officers from Parking.

8.15 Question from Councillor Candida Ronald:

Lincoln Plaza on the Isle of Dogs has recently been awarded the Carbuncle Cup for this year's worst designed development – "jarring, unsettling and shambolic" according to critics. What is the Mayor/Lead Member doing to ensure that developments in Tower Hamlets are fine examples of great design rather than the opposite?

Response of Councillor Rachel Blake (Cabinet Member for Strategic Development)

Much has been made of Lincoln Plaza, a residential building by Galliard Homes on the Isle of Dogs, winning Building Design Magazine's "Carbuncle Cup" recently.

We always strive for the highest quality in design in all new developments, big or small. Ultimately design can be subjective but should be founded on sound design principles and appreciation. While the nominations for the shortlist for this award came from members of the public, a private panel of judges made the final decision. Many comments on social media since, have not all agreed with the judges' decision.

Tower Hamlets has a rich history of innovative design. That diversity and quality is what helps to make this borough such a great place to live. There are many examples where development in Tower Hamlets has been commended for excellent design. Development at St Andrew's (Bromley by Bow), Peabody Estate (near Shadwell), St Paul's Way School (Poplar) and an affordable housing scheme at Claredale Street, Bethnal Green have all won, or been shortlisted, for architectural and good design awards in recent years.

The urban design capacity within the Planning Service has recently been strengthened with a view to maintaining a robust approach to high quality development design standards going forward. New members have also been invited to join the Council's design review panel (CADAP) and this panel will be reviewing the majority of large scale developments at pre-application stage, before designs are fixed.

Additionally, the Local Plan review is underway and opportunities to strengthen existing policies to encourage the highest quality design will be considered to help deliver buildings and places to further improve the quality of the built environment in the borough.

8.16 Question from Councillor Peter Golds

With the contract with Veolia due to expire within the next twelve months, will the Mayor confirm to residents that they will be continue to be expected to perform in accordance with the existing contract and remove rubbish when timetabled, the difficulties of which are an ongoing problem on the Isle of Dogs?

Response of Councillor Ayas Miah (Cabinet Member for Environment)

We are currently negotiating a potential extension with Veolia until 2020. Current contract conditions will be extended in accordance with any agreement, and we will ensure that Veolia deliver on their responsibilities. Should Cllr Golds have concerns about their performance I would welcome further information so I can investigate and rectify this.

8.17 Question from Councillor Clare Harrison:

Following our recent visit to Middleton Green in St Peter's ward, can the Mayor or lead member update me on progress so far in dealing with the ASB issues raised by local residents?

Response of Councillor Shiria Khatun (Deputy Mayor and Cabinet Member for Community Safety)

A ward walk about was carried out the Mayor and partners at Middleton Green on the 17th August. The following actions have taken place as discussed:

- The deployable CCTV camera was agreed to remain at site to act as a deterrent for ASB with a view to look at a permanent camera on site
- High visibility signage was put in place to note that CCTV is in place and inform drivers of it in order to also deter some speeding in the area
- We have been exploring with highways alterations to highways and parking bays to restrict the possibility of speeding cars on the adjoining street, this includes possible use of chicanes.
- We have been in discussion with the lighting department and have sought quotes to upgrade to white lighting in the park in order to improve the lighting in the area.
- We have requested from parks to reduce the crowns on the trees and low level foliage in order to improve lighting and also reduce the potential for any items to be hidden and stored under low growth.
- THEO's, SNT and Rapid Response continue to patrol and are tasked to this area. This is reviewed each fortnight and feedback suggests a significant reduction in ASB and at the last walk about the measures with CCTV, additional patrolling and support were being positively responded to and welcomed by residents in attendance.

8.18 Question from Councillor Rabina Khan

Does the Mayor believe that children and young people's interests are of importance in the borough?

Response of Mayor John Biggs

As the Councillor chose to walk out of this meeting of Full Council, it is disappointing that she was not present to properly ask this question on behalf of the residents who elected her to represent them. A written reply is below:

Yes. Do you?

8.19 Question from Councillor Amy Whitelock Gibbs (Cabinet Member for Health & Adult Services)

Can the Lead Member for Culture please update us on how the council has been supporting the Stairway to Heaven Memorial to progress and what the timescale is for the memorial to be completed?

Response of Councillor Asma Begum (Cabinet Member for Culture)

The Council has provided a total of £152,000 in two separate grants to assist with the cost of the works. The Council has also provided the land comprising a prominent location in a public park for the siting of the memorial. The Council is committed to provide maintenance and repair of the memorial at the Council's expense in perpetuity. It is difficult to say when the memorial will be completed. The length of the work is in the Trust's control, but there have been significant delays agreeing the legal terms. However, the terms are due to be agreed by Friday 16th September and the Trust is keen to commence phase 2 of the works immediately afterwards.

8.20 Question from Councillor Craig Aston

There have been a number of recent incidents on Three Colt Street in Limehouse including a bride being punched in the face on her wedding day by a robber as well as long standing ASB issues in Ropemakers Fields. Now that the Regulation 123 list has been approved specifically mentioning CCTV as a strategic investment will the Mayor indicate when Limehouse can expect to receive its first Council funded CCTV camera?

Response of Councillor Shiria Khatun (Deputy Mayor and Cabinet Member for Community Safety)

The Council and the Safer Neighbourhood Team (SNT) are aware of issues around Ropemakers & Three Colt Street and this remains a ward priority for the SNT.

The SNT and THEOs have carried out extensive patrols and have used dispersal powers in Ropemakers Fields which has resulted in a number of warnings being issued.

The Council has trimmed back vegetation in the park and installed a half lock gate at the entrance of the park to provide better visibility and prevent vehicles entering the park. The Council and SNT also considered locking the gates of the park at night and removing some benches that were being used by groups to congregate. However, residents objected to the proposals as the park has a heavy footfall and the park is considered a safer route by some residents.

The Council and SNT are considering a soft closure of the park which would allow partners to restrict access and remove individuals engaging in ASB without physically locking the park. The proposal has been considered by the Councils Legal Team. Partners are now looking at wider implications of implementing a soft closure such as consultation, cost and how the soft closure will be enforced.

In Three Colt Street the SNT and THEOs carried out extensive patrols in the area and have issued over 40 warnings. The design of the area attracts young people to the area and the vast majority of the individuals stopped were not repeat perpetrators, therefore no further action could be taken other than issuing warnings.

The Council and its partners are also considered installing gates and bollards in the area to restrict vehicle access. However, this was not progressed as the area is required for access. The machine access doors (high access doors to allow lorry access) for the equipment are located on this side of the building and are used for pump and electrical item replacement. A local company recently approached the Council interested in renting the land from the Council if they could use it for parking, this is currently being progressed and if agreed will help resolve problem in relation to access.

Ropemakers Fields has been surveyed twice in the past 12 months to look at the possibility of a temporary CCTV Camera and each time it has been decided that CCTV is not a viable option for this area or type of issue. The park has a lot of trees and installing a camera will mean the youths move one bench down and avoid the camera again.

8.21 Question from Councillor Marc Francis:

Where will the Age UK centre and pensioners lunch club be located if Gateway Housing Association secures planning permission to redevelop Appian Court?

Response of Councillor Amy Whitelock Gibbs (Cabinet Member for Health & Adult Services)

Thank you Cllr Francis for raising this important issue. We really value the services provided by Age UK to older people in the borough and will continue to work closely with them and Gateway to ensure their centre and lunch club can continue to operate.

I am advised that Gateway have been helpful in working with Age UK to identify alternative, interim premises. Discussions between Jane Ball of Gateway and Jane Caldwell of Age UK have identified the option of using Vic Johnson House, 74 Armagh Street, E3. This would be by far the best solution for this group as it is close to Appian Court and has two big rooms.

I understand the two organisations are working on the timeframe and work schedule, as Vic Johnson House is also being redeveloped. I will ask officers to keep me updated on progress and I am very happy to meet with you and anyone else who has concerns about this to discuss further.

An earlier version of this response was previously circulated to Councillors.

8.22 Question from Councillor Gulam Robbani

Following a petition signed by a record number of residents, will the Mayor inform us if he is minded to give the local Weavers residents an opportunity to have a say whether or not they wish to host the Boisakhi Mela locally?

Response of Councillor Asma Begum (Cabinet Member for Culture)

As the Councillor chose to walk out of this meeting of Full Council, it is disappointing that he was not present to properly ask this question on behalf of the residents who elected him to represent them. A written reply is below:

A decision on a 2017 Mela has yet to be made. This year there were a number of opportunities for local residents to give their views on the Mela as part of the formal consultation around the granting of a licence but we note that that no representations were received during the requisite 28 day period.

The Council also held a public meeting at Oxford House to allow for resident feedback and questions well ahead of the event.

The 2016 Mela went very well with few incidents or complaints, indeed the Mela was highly praised by the residents I heard from which suggests that fears of major disruption to the local community were not realised.

As we did this year the council will of course consult local people on the arrangements for the 2017 Mela both as part of the licencing process and more broadly.

8.23 Question from Councillor Amina Ali

Can the Deputy Mayor and Lead Member for Children's Services update me on the plans to open a new primary school on the site of the former Bow Boys Secondary School on Fairfield Road?

Response of Councillor Rachael Saunders (Deputy Mayor and Cabinet Member for Education & Children's Services)

As reported to Cabinet on 6 September, it is proposed to develop the site as a primary school. A scheme has been agreed and planning consent obtained. The programme for the opening of the school is subject to review of the specific need in the east of the borough but it was agreed that the initial consultation on the specification for the new Bow Primary School should proceed.

8.24 Question from Councillor Gulam Kibria Choudhury

Does the current mayor John Biggs support our schools turning into academies in Tower Hamlets? Could the current Mayor be transparent and provide a straight forward answer whether or not he supports the principle of turning schools into academies?

Response of Mayor John Biggs

As the Councillor chose to walk out of this meeting of Full Council, it is disappointing that he was not present to properly ask this question on behalf of the residents who elected him to represent them. A written reply is below:

It is clear hypocrisy for Cllr Choudhury to criticise the council for a school converting to an academy, when under his political group's administration four schools were converted to academies. Perhaps it is possible Cllr Choudhury simply doesn't understand how the school system works.

The Conservative Government has changed the law so that schools have the freedom to become academies if they choose – this is government policy and there is nothing that councils can do to prevent this from happening. Labour MPs and councillors fought against this change at the time and I supported that position.

We are currently setting up a Tower Hamlets Education Partnership, to ensure the council and schools work as closely as possible to continue improving the quality of education in our borough and discourage schools from seeking Academy status.

Perhaps the Independent Group should themselves spend a little more time studying so they would know how the schools in our borough actually work.

8.25 Question from Councillor Dave Chesterton

Is the Mayor yet in a position to set out the allocation process by which the operators will be chosen for the new secondary school planned for the Westferry Printworks site?


Response of Councillor Rachael Saunders (Deputy Mayor and Cabinet Member for Education & Children's Services)

The process is determined by legislation.

Following consultation, the Council will publish a specification for the school and invite Expressions of Interest from prospective operators. The Council will evaluate the bids and pass the evaluation and all the bids received to the DfE. The Regional Schools Commissioner, on behalf of the Secretary of State, takes account of the Council's evaluation in reaching the decision on the operator to be appointed.

The programme for consultation and inviting the expressions of interest is yet to be determined.

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<p>Non-Executive Report of the:</p> <p>Council</p> <p>5 December 2016</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Graham White, Interim Service Head, Legal Services and Deputy Monitoring Officer</p>	<p>Classification: Unrestricted</p>
<p>Petitions to be Presented to Council</p>	

SUMMARY

1. The Council's Constitution provides for up to three petitions to be presented at each ordinary Council meeting. These are taken in order of receipt. This report sets out the valid petitions submitted for presentation at the Council meeting on Monday 5 December 2016.
2. The deadline for receipt of petitions for this meeting is noon on Tuesday 29 November 2016. However, at the time of agenda despatch the maximum number of petitions has already been received as set out overleaf.
3. The texts of the petitions received for presentation to this meeting are set out in the attached report. In each case the petitioners may address the meeting for no more than three minutes. Members may then question the petitioners for a further four minutes. Finally, the relevant Cabinet Member or Chair of Committee may respond to the petition for up to three minutes.
4. The petition will then be referred to the relevant Corporate Director for attention who will provide a written response within 28 days.
5. Members, other than a Cabinet Member or Committee Chair responding at the end of the item, should confine their contributions to questions and not make statements or attempt to debate.

5.1 Air quality (Petition from Anisur Rahman Anis and others)

We the undersigned petition the Mayor and Council to commit to addressing the serious issue of air quality and to utilise resources across the Council to do so. We believe this is a serious health issue. Nearly 9,500 Londoners die early every year because of air pollution. Figures from the British Lung Foundation show people in Tower Hamlets are twice as likely to die from lung cancer and other lung diseases than people in London's most well off boroughs like Westminster or Kensington and Chelsea.

5.2 Cuts to Early Years Budget (Petition from Christine Trumper and others)

We implore you to reverse the decision to make cuts to Tower Hamlets Early Years' Budget. Our children deserve a sure start in life and making these cuts will have a detrimental effect. The future generation and their families need the support the Children's Centres and Satellite Sites such as One 'O' Clock Clubs offer throughout Tower Hamlets. The services that are offered are a lifeline to a lot of our families and help strengthen our communities.

5.3 Mopeds in Tom Thumb Arch (Petition from Ben Haigh and others)


As a resident of six years in Bow, East London, I have watched as Tom Thumb's Arch -- a pedestrian walkway -- has increasingly become a shortcut for mopeds and motorised scooters (Tom Thumb's Arch connects Ordell Road to Malmsbury Rd E3).

In recent months, I have repeatedly seen mopeds speeding through the walkway with no regard for pedestrians. I have reported these incidents to the local police who are endeavouring to catch the riders. They are unfortunately hampered by low resolution CCTV and barriers that do not currently force a moped rider or cyclist to disembark and walk their vehicle or bike through the arch.

This summer, my 15-month-old daughter was being pushed through the walkway, when a moped sped through and clipped our buggy. Fortunately, our child is fine, but my wife was shaken not just by the incident, but also the attitude of the moped rider who seemed to blame my wife and buggy for using this walkway.

Further to this dangerous incident, I am calling on Tower Hamlets Council to replace the existing railings with barriers that force any moped rider or cyclist to disembark. I also call for the current CCTV cameras to be reviewed to see whether they are best suited for capturing images of those responsible. An extremely serious injury or worse is inevitable if these changes are not implemented.

Agenda Item 6

Non-Executive Report of the: Council 5 December 2016 2016	 TOWER HAMLETS
Report of: Graham White, Interim Service Head, Legal Services and Deputy Monitoring Officer	Classification: Unrestricted
Questions Submitted by the Public	

Originating Officer(s)	Matthew Mannion, Committee Services Manager, Democratic Services.
Wards affected	All wards

SUMMARY

1. Set out overleaf are the questions submitted by members of the public, for response by the Mayor or appropriate Cabinet Member at the Council Meeting on 5 December 2016.
2. The Council's Constitution sets a maximum time limit of twenty minutes for this item.
3. A questioner who has put a question in person may also put one brief supplementary question without notice to the Member who has replied to his or her original question. A supplementary question must arise directly out of the original question or the reply. Supplementary questions and Members' responses to written and supplementary questions are each limited to two minutes.
4. Any question which cannot be dealt with during the twenty minutes allocated for public questions, either because of lack of time or because of non-attendance of the questioner or the Member to whom it was put, will be dealt with by way of a written answer.
5. Unless the Speaker of Council decides otherwise, no discussion will take place on any question, but any Member of the Council may move, without discussion, that the matter raised by a question be referred for consideration by the Cabinet or the appropriate Committee or Sub-Committee.

QUESTIONS

7 public questions have been submitted as set out below:-

6.1 Question from by Nick Garland

With the Tory Government hammering the NHS, what, investment has the Council made in our local health services?

6.2 Question from Kuba Stawiski

At the last full Council in September, councillors from the Independent Group walked out of the meeting after it had barely started. Given that the councillors clocked off so early, doesn't this show utter contempt for the residents that elected them to serve?

6.3 Question from Matthew Dickinson

Please could the Council provide an estimate of the costs incurred as a result of the legal case against Councillor Shahed Ali for housing fraud?

6.4 Question from Abukor Essa

What steps is the Mayor taking to tackle the housing crisis in Tower Hamlets?

6.5 Question from Dipa Baidya

A recent study into air quality has suggested that air pollution is causing more traffic accidents. The study, covering west London, showed that as many as four extra traffic accidents a day could be triggered by a spike in dirty air levels. What is the Council doing to improve air quality in Tower Hamlets?

6.6 Question from Muhammad Sulaman Alipir

Recently I had visited a One Stop Shop in Bethnal Green and I had noticed that there are no toilet facilities for customers! At our One Stop Shop local people come including children and families for their council services. Often they have waited for an hour or more.

Could the mayor look into staffing levels and service provision to see, if any improvements can be made to the time taken to resolve enquiries and serve people especially families with young children including toilet facilities for them?

6.7 Question from Chelsea Aldridge


I am very concerned about the recently reported rise of racist and xenophobic incidents and hate crimes. I believe that we all have a duty to stand up and stamp out racism and xenophobia.

We are proud to live in a diverse and tolerant society. Racism, xenophobia and hate crimes have no place in our country.

What steps will the Council take to tackle this racist, xenophobic and criminal behaviour? Will it work to ensure that local bodies and programmes have the support and resources they need to fight and prevent racism and xenophobia and reassure all people living in this area that they are valued members of our community?

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Agenda Item 8

Non-Executive Report of the: Council 5 December 2016	 TOWER HAMLETS
Report of: Corporate Director, Law, Probity and Governance	Classification: Unrestricted
Questions submitted by Members of the Council	

Originating Officer(s)	Matthew Mannion, Committee Services Manager, Democratic Services.
Wards affected	All wards

SUMMARY

1. Set out overleaf are the questions that were submitted by Members of the Council for response by the Mayor, the Speaker or the Chair of a Committee or Sub-Committee at the Council meeting on Monday 5 December 2016.
2. In accordance with Council Procedure Rule 12.2 as amended, questions relating to Executive functions and decisions taken by the Mayor are put to the Mayor unless he delegates such a decision to another Member, who will therefore be responsible for answering the question. In the absence of the Mayor, the Deputy Mayor will answer questions directed to the Mayor.
3. Questions are limited to one per Member per meeting, plus one supplementary question unless the Member has indicated that only a written reply is required and in these circumstances a supplementary question is not permitted. Oral responses are time limited to one minute. Supplementary questions and responses are also time limited to one minute each.
4. Council Procedure Rule 12.5 provides for an answer to take the form of a written answer circulated to the questioner, a reference to a published work or a direct oral answer.
5. There is a time limit of thirty minutes at the Council meeting for consideration of Members' questions with no extension of time allowed and any questions not put within this time are dealt with by way of written responses.
6. Members must confine their contributions to questions and answers and not make statements or attempt to debate.

MEMBERS' QUESTIONS

18 questions have been received from Members of the Council as follows:-

8.1 Question from Councillor M. Abdul Mukit

Can the Lead Member update Council on what progress has been made in the regeneration of Brick Lane to boost business there?

8.2 Question from Councillor Maium Miah

Does the Council need to learn any lessons from the tragic death of Bow School boy Nasar Ahmed?

8.3 Question from Councillor Amina Ali

Now that a number of months have passed since it was launched, can the Cabinet Member for Housing provide an update on the landlord licensing scheme and gauge how effective the scheme has been so far?

8.4 Question from Councillor Chris Chapman

Will the Mayor consider the Council deducting Council Tax from the allowances of Councillors who are in arrears for non-payment, as is the practice in the London Borough of Barking and Dagenham?

8.5 Question from Councillor Marc Francis

Will the Lead Member for Environmental Services update me on the action that has been taken since March by LBTH and the Environment Agency and London Legacy Development Corporation to deal with the alleged fly-tipping of industrial waste at 616 Wick Lane?

8.6 Question from Councillor Oliur Rahman

Does the Mayor believe that the Council's communications team should solely serve the Mayor and his administration or do they have some responsibility towards assisting and informing other Cllrs as well?

8.7 Question from Conucillor Clare Harrisson

Is the Mayor concerned about the NHS Sustainability and Transformation Plan for North East London and what steps are he and the Cabinet Member for Health taking to ensure plans are not signed off in secret?

8.8 Question from Councillor Andrew Wood

Will the Mayor update the Council on the status of the Isle of Dogs & South Poplar Opportunity Area Planning Framework and in particular how the negotiation over the new housing targets is going?

8.9 Question from Councillor John Pierce

What are the Council's final legal costs in the housing fraud case of former councillor Shahed Ali?

8.10 Question from Councillor Ohid Ahmed

Will the current mayor be willing to review and reverse his decision to cut the budget of children's services, community safety, community languages and to drastically close a record number of youth centres?

8.11 Question from Councillor Helal Uddin

Can you provide an update on the plans to build four cement and concrete plants on Queen Elizabeth Olympic Park – and what representations the Mayor and Council have made?

8.12 Question from Councillor Julia Dockerill

Does the Mayor have plans to apply for additional police funding from the Mayor of London, either under the London Crime Prevention Fund or the Safer Neighbourhood Board, in order to help our local police force drive down the appalling rates of anti-social behaviour in our borough?

8.13 Question from Councillor Danny Hassell

Can the Mayor or Cabinet Member set out some of the key findings of the Somali Task Force and what the next steps are?

8.14 Question from Councillor Muhammad Ansar Mustaqim

Despite repeated questions, so far, the Mayor has been unable to provide a clear answer and information about the business rate changes and its clear impact on Tower Hamlets. When will the Mayor have 'precise or further details' in relation to changes to business rates affecting the Borough and provide exact details of the amount by which the Council will be 'better or worse off' under the new business rate retention proposal announced by the Government last year in relation to 100% business rate retention and base reset?

8.15 Question from Councillor Rajib Ahmed

Will the Cabinet Member outline what the Council is doing to tackle hate crime?

8.16 Question from Councillor Peter Golds

Government regulations say 15% of Community Infrastructure Levy (CIL) should be spent in consultation with residents and that money can be spent to support the development of an area. When will the Mayor inform residents and Councillors what the process will be for making those spending decisions?


8.17 Question from Councillor Mahbub Alam

At 20th July 2016 Council meeting, Independent Group members raised several important questions relating to community safety and crime. The Cabinet member for community safety, Cllr Shria Khatun, could not provide the answers at the time and wrote

that she is trying to get the answers to our members' questions - such as, question 8.18 in relation to figures for the Islamophobic racist hate crime, something she'd claimed the Police have started to record separately since November 2015, question 8.20 about crime hot spots, anti-social behaviour in the Borough and lastly question 8.22 from Cllr Ohid Ahmed, about official crime rates and their respective percentages since 2011. Has she now provided or is able to answer these important questions relating to her portfolio and if so can she please provide the requested information to all members and include the answers in the minutes for proper record keeping.

8.18 Question from Councillor Craig Aston

Will the Mayor give an update on the progress of Decent Homes work at Oast Court, Three Colt Street and Kiln Court, Newell Street?

Decision Report Cover Sheet: Council 5 December 2016	 TOWER HAMLETS
Cover Report of: Matthew Mannion, Committee Services Manager	Classification: Unrestricted
Gambling Policy 2016 - 19	

Originating Officer(s)	Matthew Mannion, Committee Services Manager (Cover Report)
Wards affected	All Wards

Summary

The Gambling Policy was presented to Cabinet on 4 October 2016 where it was considered by the Mayor and Cabinet Members. The Mayor agreed that the policy should be recommended to Council for approval.


The Report and Appendices are attached to this Cover Sheet.

Recommendations:

The Council is recommended to:

1. Agree the adoption of the revised Gambling Policy.

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Cabinet 4 October 2016	 TOWER HAMLETS
Report of: Communities, Localities, Culture – Corporate Director	Classification: Unrestricted
Gambling Policy 2016 - 19	

Lead Member	Councillor Shiria Khatun, Deputy Mayor and Cabinet Member for Community Safety
Originating Officer(s)	Andy Bamber – Service Head David Tolley – Head of Environmental Health and Trading Standards
Wards affected	All wards
Key Decision?	Yes
Community Plan Theme	A Safe and Cohesive Community

Executive Summary

As a Licensing Authority the Council must review the existing Gambling Policy and adopt a new policy by November 2016, as one of the responsibilities it has to regulate 'high street' licences under the Gambling Act 2005. The purpose of the policy is to define how the responsibilities under the Act are going to be exercised and administered. The Act requires licensing authorities to aim to permit the use of premises for gambling in so far as it is in accordance with the regulatory framework (any codes of practice and Gambling Commission guidance), the council's policy and is reasonably consistent with the licensing objectives. This means that the council can only refuse gambling that is not in accordance with the above and cannot for example ban gambling or specific forms of gambling.

Subject to agreement the Policy will be presented to Full Council for adoption under the provisions set out by the Council's Constitution

Recommendations:

The Mayor in Cabinet is recommended to:

1. To recommend to Full Council the adoption of the revised Gambling Policy.

1. REASONS FOR THE DECISIONS

- 1.1 All relevant local authorities are required under the Gambling Act to review their gambling policy.
- 1.2 The purpose of the policy is to define how the responsibilities under the Act are going to be exercised and administered.
- 1.3 A statutory consultation process must take place prior to the adoption of the revised Gambling Policy by full Council.

2. ALTERNATIVE OPTIONS

- 2.1 Pursuant to the Gambling Act 2005, the Council is a responsible authority for the licensing of premises used for gambling. If the Council did not have a policy it would be acting ultra vires with regards to any decisions it makes determining gambling premises licences.
- 2.2 The Gambling Commission has laid down guidance which the Council must have regard to in carrying out their functions under the Act, including setting their Gambling policy. Departure from the guidance without good reason could leave the council at risk of judicial challenge. The Gambling Commission guidance has been followed in drafting the revised Gambling Policy. The policy focuses on the elements covered by the licensing objectives.

3. DETAILS OF REPORT

- 3.1 The Gambling Act 2005 gives local authorities a range of responsibilities relating to gambling. The Gambling Policy states how the Licensing Authority will exercise this responsibility and authority.
- 3.2 This policy covers the following:
 - How the Licensing Authority will use its regulatory powers in relation to applications and reviews of the activities it regulates, to the extent it is allowed by statute.
 - The main licensing objective for the authority is protecting the vulnerable.
 - The Licensing Authority approach to regulation
 - The scheme of delegation
- 3.3 The Gambling Policy complies with guidance issued by the Gambling Commission.
- 3.4 Members should note that some of the major issues and concerns about gambling are not addressed in the policy or by the approach of the consultation. For example, gambling addiction is outside the remit of the

consultation, as are arguments about the public benefits, or otherwise, of a more liberal gambling regime.

- 3.5 The responsibilities the Council has under the Gambling Act 2005 have not been controversial. To date, 80 licences have been issued. These have primarily been to betting shops and adult amusement arcades. These businesses are nearly all national companies that have conducted their business within the legal requirements. The number of premises in a particular area is not grounds for objection.
- 3.6 The Council does not have the powers within its Gambling Policy to regulate on-line gambling sites. All gambling websites trading with, or advertising to, consumers in Britain must have a Gambling Commission licence issued by the Gambling Commission.
- 3.7 In April 2015 the government changed the use class order so that betting shops were removed from their previous A2 use class and made a 'sui generis' use. As such planning permission is now required to change the use from any other use to a betting shop. This has meant that there is slightly more control under planning legislation to control the growth of Betting Shops.
- 3.8 Planning powers cannot control existing betting shops if they have already opened up under a permitted change of use (i.e. before the recent changes to the use class order moving betting shops from A2 to 'sui generis'), however any further change of use applications for a betting shop would be subject to a planning application. As part of the determination of the application, issues such as the number of betting shops in the surrounding area could be a consideration if the area was becoming saturated with betting shops.
- 3.9 There have been several concerns raised though London Councils concerning the fixed odds betting terminals (FOBT's) that have been installed within betting shops. These B2 gambling machines play games of chance such as roulette. With a betting shop licence, the operator can install up to four machines, which have a maximum stake of £100 and a maximum prize of £500. London Councils are promoting that the maximum £100 stake on B2 machines should be changed to £2 to prevent the clustering of betting shops due to the profitability of such gambling machines. Tower Hamlets is a signatory to this campaign.
- 3.10 We have not experienced the same volume of applications in gambling as we have in other areas of licensing. There has been one application since 2014, this was for a Paddy Power Shop in Roman Road. This application was objected to by the community, but after consideration by the Licensing Sub Committee and legal advice the licence was issued.
- 3.11 The issues of betting shop clustering and concern over fixed odd betting terminals (FOBT) have shown that gambling generates extremely strong feelings. Whilst licensing authorities do not have the powers to refuse new applications or limit FOBT machines, the requirement for operators to prepare local risk assessments in relation to their premises from April 2016 means that

licensing authorities need to set out their expectations within their statements of Gambling Policy.

3.12 The additional requirements to include in the Gambling Policy are noted below:

- to set out a local profile, the Policy links to the Borough profile held on the website, therefore the profile can be updated without the need to re-consult on amending the full Policy.
- details of the inspection format to be used
- risk assessment advice from operators
- sample licence conditions

3.13 During the consultation process a number of representations were made by national Betting shop companies. We have reviewed the comments made therein and have made slight changes to the requirements that are required of operators in relation to their local risk assessments. We have also reflected on the content of our local profile and have added this information onto the website. No further suggestions or changes have been made. The proposed policy is at Appendix One.

3.14 The comments by the Campaign for Fairer Gambling were noted in relation to the use of FOBT's, but this can only be considered on an individual application basis. The written responses are detailed within Annex 3 of the proposed policy.

3.15 The only controversial applications have been where betting shops have applied to open in close proximity to schools or places of worship. The powers the Council have are limited and it is not possible to make either policy or decisions regarding this issue under the Gambling Policy.

3.16 It is proposed that the current 'no casino' resolution that is currently in the existing policy remains.

3.17 An Equalities checklist has been undertaken as is at Appendix Two.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

4.1 There are no direct financial implications arising in this report which notes the Council's responsibilities in adoption of the Gambling Policy required under the Gambling Act 2005. The costs of each Gambling licence under the Act are reviewed annually as part of the discretionary fees and charges report to Cabinet. The fees cover the cost of administration and compliance contained within the budget for the service. The costs of the review will be met from within existing resources.

5. LEGAL COMMENTS

- 5.1 Section 349 of the Gambling Act 2005 (**'the 2005 Act'**) requires the Council to prepare a statement of the principles that it proposes to apply in exercising its functions under the Act and to determine and then publish this statement. This statement is more commonly known as a Gambling Policy or Statement of Gambling Policy. The legal requirement is for the preparation of the statement of principles to be undertaken every 3 years.
- 5.2 The current statement of policy was published on 1st November 2013, and therefore the fresh statement must be published before 1st November 2016.
- 5.3 Pursuant to section 25 of 2005 Act, the Gambling Commission shall from time to time issue guidance as to the manner in which local authorities are to exercise their functions under this Act, and in particular, the principles to be applied by local authorities in exercising functions under the Act. The 5th Guidance was issued in September 2015 and Part 6 of the same provides Guidance to local authorities on the preparation and publication of the statement of licensing policy. The Council should not depart from this guidance without good reason but as stated in paragraph 3.3 of this Report, the proposed Policy complies with the Guidance
- 5.4 Prior to publishing the statement, the Council must undertake statutory consultation as provided by section 349(3) of the Act. Further, in consulting, the Council must comply with the common law principles set out in *R v Brent London Borough Council, ex p Gunning*, (1985) and recently approved by the Supreme Court in *R(Mosely) v LB Haringey 2014*. Those are *'Firstly, the consultation must be at a time when proposals are still at a formative stage. Secondly, the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response. Thirdly, adequate time must be given for consideration and response. Fourthly, the product of consultation must be conscientiously taken into account in finalising any statutory proposals.'*
- 5.5 Consultation has been carried out as referred to in paragraphs 3.13 and 3.14 of the report. The consultation responses have been taken into account to make relevant adjustments to the proposed Policy and Annex 3 of the proposed Policy at Appendix 1 gives a summary of the issues raised in the responses.
- 5.6 The terms of reference of the Licensing Committee provide that the Licensing Committee considers statements of Licensing Policy and a report went to that Committee on 13th September 2016.
- 5.7 Pursuant to the Local Authorities (Functions and Responsibilities) (England) Regulations 2000, the Gambling Policy is required to be part of the Council's policy framework. Article 4 of the Constitution confirms this to be the case and a review of the Gambling Policy requires the procedure set out in the Budget and Policy Framework Procedure Rules. This requires pre-decision scrutiny

by the Overview & Scrutiny Committee and a report went to Overview & Scrutiny on 28th September 2016.

- 5.8 Also pursuant to the Council's Budget and Policy Framework Procedure Rules, the Mayor as the Executive is responsible for preparing the draft Policy for submission to the full Council. It will therefore be for the Mayor in Cabinet to recommend the draft Policy to Full Council. Prior to recommending, the Mayor as the Executive must also carefully analyse the consultation responses before making a decision to recommend to Full Council.
- 5.9 In carrying out its functions, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who do not (the public sector equality duty). An equality analysis will be required which is proportionate to the function in question and its potential impacts. An Equality Analysis Quality Assurance Checklist has been undertaken and which is at Appendix 2. The result of performing such is that "the policy does not appear to have any adverse effects on people who share *Protected Characteristics* and no further actions are recommended at this stage".

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 The Equalities Impact Assessment has been reviewed in respect of this policy and no adverse issues have been identified.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 The Gambling policy details the regulatory approach to gambling establishments with the Borough. The fees imposed for the licence are set by government and have been adopted by the Licensing Committee. The fees cover the cost of regulating and administering the Gambling Policy.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 There are no environmental impacts with regards to this policy or the consultation process.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 There are no risk management issues with the revised policy or the consultation process.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 One of the key licensing objectives is to prevent gambling from being a source of crime and disorder. The policy supports and assists with crime and disorder reduction by controlling those who are able to offer gambling to members of the public and imposing conditions on relevant premises licences.

11. SAFEGUARDING IMPLICATIONS

- 11.1 A statutory licensing objective of the Gambling Policy concerns the protection of children from harm. The Policy details how regulation through licencing promotes this objective.

Linked Reports, Appendices and Background Documents

Linked Report

None

Appendices

Appendix One: Gambling Policy 2016-2019

Appendix Two: Equalities Checklist

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

None

Officer contact details for documents:

N/A

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Gambling Act 2005

**The London Borough of Tower Hamlets
Gambling Policy 2016- 2019**

(Italics are changes after consultation)

Summary of Local Authority Gambling Policy

1. Licensing local authorities in England and Wales have all been required by the Gambling Act 2005 to adopt a gambling policy following consultation.
2. The following policy was adopted after consultation, including but not confined to the consultation required by the legislation.
3. The policy has to be reviewed every three years and consequently it is now being sent out for a new round of consultation. Again the consultation will include but not be confined to the statutory consultation.
4. The policy sets out in detail how the licensing authority will discharge its licensing functions under the Gambling Act 2005.
5. There are three licensing objectives set out in the Act, as follows:
 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
 - Ensuring that gambling is conducted in a fair and open way
 - Protecting children and other vulnerable people from being harmed or exploited by gambling
6. The main area of involvement for the licensing authority is protecting the vulnerable, and the licensing policy is largely devoted to seeking to achieve this, across the range of premises licences and permits which the authority will administer.
7. The licensing authority approach to enforcement is defined.
8. The scheme of delegation that defines the responsibility for decision making, administration and enforcement is also included.

Contents

Item	Page
Summary of Local Authority Gambling Policy	2
Contents	3
Part A	
1. The licensing objectives	4
2. Introduction	4
3. Declaration	5
4. Responsible Authorities	5
5. Interested parties	6
6. Exchange of information	7
7. Enforcement	7
8. Licensing authority functions	8
Part B - Premises licences and Other issues	
1. General Principles	10
2. Premises	10
3. Location	11
4. Duplication with other regulatory regimes and licensing objectives	11
5. Licensing Objectives	11
6. Conditions	12
7. Door Supervisors	15
8. Adult Gaming Centres	15
9. (Licensed) Family Entertainment Centres	16
10. Casinos	16
11. Bingo Premises	16
12. Betting Shops	17
13. Tracks	17
14. Travelling Fairs	19
15. Provisional Statements	20
16. Reviews	20
Part C – Permits / Temporary and Occasional Use Notices	
1. Unlicensed Family Entertainment Centre gaming machine permits	21
2. (Alcohol) Licensed premises gaming machine permits	22
3. Prize Gaming Permits	23
4. Club Gaming and Club Machines Permits	24
5. Temporary Use Notices	25
6. Occasional Use Notices	25
Part D – Scheme of Delegation	
1. Administration, Exercise and Delegation of Functions	26
2. Table of Delegations of Licensing Functions	27
Appendices	
Annex 1 - Map of the Borough: Licensed Gambling Premises	28
Annex 2 - A list of consultees	29
Annex 3 –Consultation responses	32
Annex 4 –Gambling Best Practice Guide	34

PART A

1. The Licensing Objectives

- 1.1 In exercising most of their functions under the Gambling Act 2005, (the Act) licensing authorities must have regard to the licensing objectives as set out in section 1 of the Act. The licensing objectives are:
- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
 - Ensuring that gambling is conducted in a fair and open way
 - Protecting children and other vulnerable people from being harmed or exploited by gambling
- 1.2 The Gambling Commission's guidance emphasises that moral objections to gambling, or a view that it is generally undesirable are not licensing objectives and cannot inform any decisions by the licensing authority. Also neither public safety nor public nuisance are licensing objectives. These issues will largely be dealt with by the Council's Environmental Health Service
- 1.3 This authority recognises that in making decisions about premises licences and temporary use notices it should aim to permit the use of premises for gambling in so far as it thinks it is:-
- in accordance with any relevant code of practice issued by the Gambling Commission
 - in accordance with any relevant guidance issued by the Gambling Commission
 - reasonably consistent with the licensing objectives in accordance with the authorities statement of licensing policy
- 1.4 The Gambling Commission's Licence Conditions and Code of Practice (LCCP) require gambling premises to undertake a risk assessment taking into consideration their local information. Specific information about localities is provided in this policy at Annexe 6.
- 1.5 The risk assessment is required to be shared with the Council where there is a new application and or a variation to an existing premises licence.

2 Introduction

- 2.1 The London Borough of Tower Hamlets is a single tier authority on the East side of inner London. The Borough is shown in the map in **Annex 1** where Gambling premises licences have been issued.
- 2.2 Licensing authorities are required by the Gambling Act 2005 to publish a statement of the principles that they propose to apply when exercising their functions. This statement must be published at least every three years. The statement must also be reviewed from “time to time” and any amended parts re consulted upon. The statement must be then re-published.
- 2.3 Tower Hamlets Council has consulted widely upon its policy statement before finalising and publishing it. A list of the persons and organisations consulted is provided in **Annex 2** of the Policy adopted by the Council. We have consulted businesses, elected representatives, community and third sector organisations and responsible authorities.
- 2.4 The Gambling Act requires that the following parties are consulted by Licensing Authorities:
- The Chief Officer of Police
 - One or more persons who appear to the authority represent the interests of persons carrying on gambling businesses in the authority’s area
 - One or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority’s functions under the Gambling Act 2005.
- 2.5 The consultation took place between 19th October 2015 and 17th January 2016. The results of the consultation are summarised in **Annex 3**
- 2.6 The policy has to be approved at a meeting of the Full Council published via our website as well as being available in the Town Hall and Idea Stores.
- 2.7 It should be noted that this policy statement will not override the right of any person to make an application, make representations about an application, or apply for a review of a licence. Each will be considered on its own merits and according to the statutory requirements of the Gambling Act 2005.
- 2.8 The Licensing Authority would like to encourage the highest standards within premises that hold a licence under the Gambling Act 2005. The Licensing Authority has produced a ‘Gambling Best Practice Guide’ to assist both new applicants and existing operators.

2.9 The list of recommended measures listed in **Annex 4** is not exhaustive but gives an indication of some of the suitable measures and procedures that are expected in well managed premises.

3 Declaration

3.1 In producing this licensing policy the Authority has had regard to the licensing objectives of the Gambling Act 2005 and the guidance issued by the Gambling Commission. The policy has also had regard to any responses from those consulted on the policy statement.

4 Responsible Authorities

4.1 The licensing authority is required to state the principles it will apply to designate a body which is competent to advise the authority about the protection of children from harm. The principles are:

- the need for the body to be responsible for an area covering the whole of the licensing authority's area
- the need for the body to be answerable to democratically elected persons, rather than any particular vested interest group

4.2 In accordance with the Gambling Commission's Guidance for local authorities this authority designates the Local Safeguarding Children Board for this purpose. This is the statutory body charged with coordinating the activities of organisations in Tower Hamlets who are instrumental in safeguarding and promoting the welfare of children.

4.3 The contact details of all the responsible authorities are found on the Council's website at www.towerhamlets.gov.uk

5 Interested parties

5.1 Interested parties can make representations about licence applications, or apply for a review of an existing licence. Interested parties are defined as a person who in the opinion of the licensing authority

- a) lives sufficiently close to the premises to be likely to be affected by the authorised activities,
- b) has business interests that might be affected by the authorised activities,
- c) represents persons who satisfy paragraph (a) or (b)

5.2 The licensing authority is required to state the principles it will apply in exercising its powers under the Gambling Act 2005 to determine whether a person is an interested party.

5.3 These principles are that :-

- Each case will be decided upon its merits.
- This authority will not apply a rigid rule to its decision making.
- It will consider the examples of considerations provided in the Gambling Commission's Guidance to local authorities.
- It will also consider the Gambling Commission's advice that "business interests" should be given its widest possible meaning and includes partnerships, charities, faith groups, and medical practices.

5.4 The Gambling Commission has recommended that the licensing authority states that interested parties include trade associations and trade unions, and residents' and tenants' associations. This authority will not however generally view these bodies as interested parties unless they have a member who can be classed as one under the terms of the Gambling Act 2005 e.g. lives sufficiently close to the premises to be likely to be affected by the activities being applied for.

5.5 Interested parties can be persons who are democratically elected, such as Councillors and MP's. Other than these persons, this authority will require written evidence that a person 'represents' someone who either lives sufficiently close to the premises to be likely to be affected by the authorities activities and/or business interests that might be affected by the authorised activities. A letter from one of these persons, requesting the representation is sufficient.

5.6 Individuals may wish to approach Councillors to ask them to represent their views. If Councillors take on a representative role they will not be able to be part of the decision making process. If they are a member of the Committee they will withdraw for the hearing.

6 Exchange of Information

6.1 Licensing Authorities have a number of responsibilities relating to the control and exchange of information that has been gained in carrying out its duties and responsibilities under the Act.

6.2 The principle that this licensing authority applies is that it will act in accordance with the provisions of the Gambling Act 2005 in its exchange of information which includes the provision that the Data Protection Act 1998 will not be contravened.

6.3 The licensing authority will also have regard to any guidance issued by the Gambling Commission to Local Authorities on this matter when it is published, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005. Any protocols that are adopted will be made available if requested.

7 Enforcement

- 7.1 Licensing authorities are required to state the principles to be applied by the authority in exercising the functions with respect to the inspection of premises; and the powers to institute criminal proceedings in respect of the offences committed under the Gambling Act 2005.
- 7.2 This Licensing Authority's general principles of enforcement are set out in its enforcement policy. In addition we will be guided by the Gambling Commission's Guidance for local authorities and we will endeavour to be:
- **Proportionate:** regulators should only intervene when necessary: Remedies should be appropriate to the risk posed, and costs identified and minimised;
 - **Accountable:** regulators must be able to justify decisions, and be subject to public scrutiny;
 - **Consistent:** rules and standards must be joined up and implemented fairly;
 - **Transparent:** regulators should be open, and keep regulations simple and user friendly; and
 - **Targeted:** regulation should be focused on the problem, and minimise side effects
 - **Avoid duplication** with other regulatory regimes so far as possible.
- 7.3 This licensing authority has, as recommended by the Gambling Commission's Guidance for local authorities, adopted a risk based inspection programme.
- 7.4 The local authority does expect that premises that are licensed are aware of and keep to the terms of their licence. The Authority will take appropriate enforcement action to ensure that this is the case, and is especially concerned to ensure that the licensing objective relating to children is met in full.
- 7.5 The main enforcement and compliance role for this licensing authority will be to ensure compliance with the Premises Licences and other permissions which is authorises. The Gambling Commission will be the enforcement body for the Operator and Personal Licences. Concerns about manufacture, supply or repair of gaming machines will not be dealt with by the licensing authority but will be notified to the Gambling Commission.
- 7.6 This licensing authority also intends to monitor non-licensed gambling, and is especially concerned to stop non-destination gambling by children and young adults. Non destination gambling is where the destination is not primarily a gambling premises and is mainly visited for a different purpose. This typically (but not exclusively) involves gaming machines in premises

open to the public such as public houses

- 7.7 This Licensing Authority will continue to keep informed of developments with the work from Central Government and sister organisations on the principles of Better Regulation Executive in its consideration of the regulatory functions
- 7.8 Bearing in mind the principle of transparency, this licensing authority's enforcement/compliance protocols/written agreements will be available upon request to the licensing department and on the Council's web site. Our risk methodology will also be available upon request. (A charge may be made for hard copies).
- 7.9 The authority recognises that bookmakers and other operators may have a number of premises within its area. In order to ensure that compliance issues are recognised and dealt with at the earliest possible stage, operators are requested to give the authority a single named contact., who should be a senior individual, and whom the authority will contact first should any compliance queries or issues arise. The authority however, reserves the right to institute proceedings, or take other action as necessary and consistent with its general policies.
- 7.10 The Authority uses the templates inspection forms produced by the Leicester, Rutland and Leicestershire Licensing Forum and Leicestershire Local Economic Partnership.
- 7.11 To assist the targeting of the Council's enforcement activity the Council will request that operators / premises share:-
- test purchasing results (subject to the terms of primary authority agreements) ;
 - incidents in premises, which managers are likely to be required to report to head office;
 - information about numbers of self-excluded gamblers to help it develop its understanding about the risk of problem gambling in its area.
- 7.12 This information will help the Council to get a clearer picture of which premises may be experiencing issues, meaning that the inspection and enforcement activity is appropriately structured
- 7.13 Operators are not automatically required to share their risk assessments with licensing authorities except when they are applying for a new premises licence or to vary an existing one. However, the Gambling Commission is advising operators to do so.
- 7.14 The Council will request a copy of each premises risk assessment during the first year of this Policy.

8 Licensing Authority Functions

8.1 Licensing Authorities are required under the Act to:

- Be responsible for the licensing of premises where gambling activities are to take place by issuing Premises Licences
- Issue Provisional Statements ("in principle" licences where premises are not yet developed)
- Regulate members' clubs and miners' welfare institutes who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits
- Issue Club Machine Permits to Commercial Clubs (Commercial Clubs are member clubs that operate on a "for profit" basis)
- Grant permits for the use of certain lower stake gaming machines at unlicensed Family Entertainment Centres (Premises where low level gambling is permitted for children)
- Receive notifications from alcohol licensed premises (under the Licensing Act 2003) for the use of two or fewer gaming machines
- Grant Licensed Premises Gaming Machine Permits for premises licensed to
- sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where more than two machines are required
- Register small society lotteries below prescribed thresholds
- Issue Prize Gaming Permits
- Receive and Endorse Temporary Use Notices
- Receive Occasional Use Notices
- Provide information to the Gambling Commission regarding details of licences issued (see section above on 'information exchange')
- Maintain registers of the permits and licences that are issued under these functions

8.2 This list may be added to on the advice of the Gambling Commission

8.3 Local licensing authorities will not be involved in licensing remote gambling. (Remote gambling is via the internet or interactive television). This will fall to the Gambling Commission via Operator Licences.

PART B - Premises Licences and other matters

1 General Principles

- 1.1 Premises licences will be subject to the requirements set out in the Gambling Act 2005 and regulations, as well as specific mandatory and default conditions which will be detailed in regulations issued by the Secretary of State. Licensing authorities are able to exclude default conditions and also attach others, where it is believed to be appropriate.

2 Premises

- 2.1 Premises are defined in the Act as “any place”. Different premises licences cannot apply in respect of a single premises at different times. However it is possible for a single building to be subject to more than one premises licence provided they are for different parts of the building. Different parts of the building can reasonably be regarded as being separate premises will always be a question of fact in the circumstances. However areas of a building that is artificially or temporarily separate can be properly regarded as different premises.
- 2.2 This licensing authority will take particular note of the Gambling Commission’s Guidance to local authorities that: -
- "Licensing authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular they should be aware that entrances and exits from parts of a building covered by one or more licences should be separate and identifiable so that the separation of different premises is not compromised and that people do not “drift” into a gambling area"
 - "Licensing authorities should pay particular attention to applications where access to the licensed premises is through other premises (which themselves may be licensed or unlicensed), especially if this raises issues in relation to children. There will be specific issues that authorities should consider where children can gain access; compatibility of the two establishments; and ability to comply with the requirements of the Act. But, in addition an overriding consideration should be whether, taken as a whole, the co-location of the licensed premises with other facilities has the effect of creating an arrangement that otherwise would, or should, be prohibited under the Act."
- 2.3 An applicant cannot obtain a full premises licence until the premises in which it is proposed to offer the gambling are constructed. The Gambling Commission has advised that reference to “the premises” are to the

premises in which gambling may now take place. Thus a licence to use premises for gambling will only be issued in relation to premises that are ready to be used for gambling. This authority agrees with the Gambling Commission that it is a question of fact and degree whether premises are finished to a degree that they can be considered for a premises licence. The Gambling Commission emphasises that requiring the building to be complete ensure that the authority can, if necessary, inspect it fully, as can other responsible authorities with inspection rights.

3 Location

- 3.1 This licensing authority is aware that demand issues (for example whether or not there is sufficient customer demand to make a site commercially viable) cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives can. In line with the Gambling Commission's Guidance for local authorities, this authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.
- 3.2 It is the licensing authorities' view that premises should not normally be licensed which are close to schools, playgrounds, or other educational establishments such as museums. However any such policy does not preclude any application being made and each application will be decided on its merits, with the onus upon the applicant showing how the concerns can be overcome.
- 3.3 The council will need to be satisfied that there is sufficient evidence that the particular location of the premises would not be harmful to the licensing objectives.
- 3.4 From 6 April 2016, it is a requirement of the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), under section 10, for licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at their premises and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in this policy.
- 3.5 The LCCP goes on to say licensees must review (and update as necessary) their local risk assessments:
 - a. to take account of significant changes in local circumstance, including those identified in this policy;
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. when applying for a variation of a premises licence; and

d. in any case, undertake a local risk assessment when applying for a new premises licence.

3.6 The Council expects the local risk assessment to consider as a minimum issues *presented by the local landscape, such as;*

Exposure to vulnerable groups

Identification of local specific risks

Type of footfall – children, visitors, families, residents

Educational facilities

Community Centers

Homelessness /rough sleeper hostels, provision of support services

3.7 In any case the local risk assessment should show how vulnerable people, including people with gambling dependencies, are protected.

3.8 Other matters that the assessment may include:

- The training of staff in brief intervention when customers show signs of excessive gambling, the ability of staff to offer brief intervention and how the manning of premises affects this.
- Details as to the location and coverage of working CCTV cameras, and how the system will be monitored.
- The layout of the premises so that staff have an unobstructed view of persons using the premises;
- The number of staff that will be available on the premises at any one time. If at any time that number is one, confirm the supervisory and monitoring arrangements when that person is absent from the licensed area or distracted from supervising the premises and observing those persons using the premises.
- Arrangements for monitoring and dealing with under age persons and vulnerable persons, which may include dedicated and trained personnel, leaflets, posters, self-exclusion schemes, window displays and advertisements not to entice passers-by etc.
- The provision of signage and documents relating to games rules, gambling care providers and other relevant information is provided in both English and the other prominent first language for that locality.
- Where the application is for a betting premises licence, other than in respect of a track, the location and extent of any part of the premises which will be used to provide facilities for gambling in reliance on the licence.

3.9 To assist operators, Annex 6 sets out the Council's Gambling Local Area Profiles criteria.

4 Duplication with other regulatory regimes and licensing objectives

- 4.1 This authority will seek to avoid any duplication with other statutory / regulatory systems where possible, including planning. This authority will not consider whether a licence application is likely to be awarded planning or building consent, in its consideration of it. This authority will though listen to, and consider carefully, any concerns about conditions which are not able to be met by licensees due to planning restrictions, should such a situation arise.

5 Licensing Objectives

- 5.1 Premises licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, this licensing authority has considered the Gambling Commission's Guidance to local authorities and some comments are made below.

- 5.2 Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
This licensing authority is aware that the Gambling Commission will be taking a leading role in preventing gambling from being a source of crime.

The Gambling Commission's Guidance does however envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Thus, where an area has known high levels of organized crime this authority will consider carefully whether gambling premises are suitable to be located there and whether conditions may be suitable such as the provision of door supervisors. This licensing authority is aware of the distinction between disorder and nuisance and will consider factors such as whether police assistance was required and how threatening the behaviour was to those who could see it, so as to make that distinction. Issues of nuisance cannot be addressed via the Gambling Act provisions. These will be addressed by the relevant regulatory authority e.g. Environmental Health.

- 5.3 Ensuring that gambling is conducted in a fair and open way. This licensing authority has noted that ensuring that gambling is conducted in a fair and open way is a matter for the Gambling Commission. This will not be the case if the licensing authority becomes involved in licensing betting track operators.
- 5.4 Protecting children and other vulnerable persons from being harmed or exploited by gambling. This licensing authority has noted the Gambling Commission Guidance to local authorities that this objective means preventing children from taking part in gambling (as well as restriction of advertising so that gambling products are not aimed at or are, particularly attractive to children). The licensing authority will therefore consider, as suggested in the Gambling Commission's Guidance, whether specific measures are required at particular premises, with regard to this licensing

objective. Appropriate measures may include supervision of entrances/ machines, segregation of areas.

5.5 This licensing authority will also make itself aware of the Codes of Practice which the Gambling Commission issues as regards this licensing objective, in relation to specific premises such as casinos.

5.6 As regards the term “vulnerable persons” it is noted that the Gambling Commission is not seeking to offer a definition but states that “it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gambling beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs.” This licensing authority will consider this licensing objective on a case by case basis. Should a practical definition prove possible in future then this policy statement will be updated with it, by way of a revision.

6 Conditions

6.1 Any conditions attached to licences will be proportionate and will be:

- relevant to the need to make the proposed building suitable as a gambling facility
- directly related to the premises and the type of licence applied for;
- fairly and reasonably related to the scale and type of premises: and
- reasonable in all other respects.

6.2 Decisions upon individual conditions will be made on a case by case basis, although there will be a number of control measures, this licensing authority will consider utilising should there be a perceived need, such as the use of door supervisors, supervision of adult gaming machines, appropriate signage for adult only areas.

6.3 The Gambling Commission has produced a list of sample conditions, and these are reproduced at Annex 5. These could be imposed in a number of circumstances to address evidence based concerns.

6.3 There are specific comments made in this regard under each of the licence types below. This licensing authority will also expect the licence applicant to offer his/her own suggestions as to way in which the licensing objectives can be met effectively. The licensing authority will consider the following specific measures in relation to all licensed premises, to the extent that they are relevant to a specific application:

- Leaflets aimed at giving assistance to problem gamblers clearly displayed in prominent areas and also more discreet areas such as toilets

- Self-exclusion forms available
- The odds clearly displayed on all fixed odds machines
- All ATM or other cash terminals to be separate from gaming machines, so that clients have to leave the machines for more funds as required. They should also display stickers with GamCare (or replacement organisation) Helpline information prominently displayed.
- There must be clear visible signs of any age restrictions in any gaming or betting establishments. Entrances to gambling and betting areas must be well supervised and age verification vetting operated.
- Posters with details of GamCare's (or replacement organisation) telephone number and website

The above list is not exhaustive.

- 6.4 This licensing authority will also consider specific measures which may be required for buildings which are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of Gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives. These matters are in accordance with the Gambling Commission's Guidance.
- 6.5 This authority will also ensure that where category C or above machines are on offer in premises to which children are admitted:
- all such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
 - only adults are admitted to the area where these machines are located;
 - access to the area where the machines are located is supervised the area where these machines are located is arranged so that it can be observed by the staff or the licence holder; and
 - at the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.
- 6.6 These considerations will apply to premises including buildings where multiple premises licences are applicable.

6.7 This licensing authority is aware that betting tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the Gambling Commission's Guidance, this licensing authority will consider the impact upon the third licensing objective and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

6.8 It is recognised that there are conditions which the licensing authority cannot attach to premises licences which are:

- any condition on the premises licence which makes it impossible to comply with an operating licence condition
- conditions relating to gaming machine categories, numbers, or method of operation;
- conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated) and
- conditions in relation to stakes, fees, winning or prizes
- Applicants will however need to demonstrate social responsibility and adhere to best practice in the protection of the vulnerable

7 Door Supervisors

7.1 The Gambling Commission advises in its Guidance for local authorities that licensing authorities may consider whether there is a need for door supervisors in terms of the licensing objectives of protection of children and vulnerable persons from being harmed or exploited by gambling, and also in terms of preventing premises becoming a source of crime.

7.2 The Private Security Industry Act 2001 exempts door supervisors for casinos and bingo halls from requiring a Door Supervisors Licence. Irrespective of the provision this authority will require door supervisors used at these premises to be licensed.

7.3 For other premises, where supervision of entrances/machines is appropriate any requirements for door supervisors or others will be on a case by case basis. In general betting offices will not require door supervisors for the protection of the public. A door supervisor will only be required if there is clear evidence that the premises cannot be adequately supervised from the counter and that door supervision is both necessary and proportionate.

8 Adult Gaming Centres

8.1 This licensing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling

and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under 18 year olds do not have access to the premises.

Appropriate licence conditions may cover issues such as:

- Proof of age schemes
- CCTV
- Door supervisors
- Supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-barring schemes
- Provision of information leaflets/ helpful numbers for organisations such as GamCare

8.2 This list is neither mandatory nor exhaustive, and is merely indicative.

9 (Licensed) Family Entertainment Centres:

9.1 This licensing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machine areas. Appropriate licence conditions may cover issues such as:

- Proof of age schemes
- CCTV
- Door supervisors
- Supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-barring schemes
- Provision of information leaflets/ helpful numbers for organisations such as GamCare
- Measures/training for staff on how to deal with suspected truant school children on the premises

9.2 This list is not mandatory, nor exhaustive, is it merely indicative.

9.3 This licensing authority will, in accordance with the Gambling Commission's guidance, refer to the Commission's website to see any conditions that apply to operator licences covering the way in which the

area containing the category C. Category C machines give a higher payout than children are permitted to use should be delineated. This licensing authority will also make itself aware of any mandatory or default conditions on these premises licences, when they have been published.

10 Casinos

- 10.1 The Gambling Act, section 166, allows licensing authorities to resolve not to issue casino premises licences. The licensing authority has consulted with residents and businesses to seek their views before deciding whether to make such a resolution. As a result of the consultation the council has resolved not to issue casino premises licences. (Council decision 18th September 2013)

11 Bingo premises

- 11.1 This licensing authority recognises that the Gambling Commission's Guidance states:

"It is important that if children are allowed to enter premises licensed for bingo that they do not participate in gambling, other than on category D machines. Where category C or above machines are available in premises to which children are admitted licensing authorities should ensure that:

- all such machines are located in an area of the premises separate from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
- only adults are admitted to the area where the machines are located;
- access to the area where the machines are located is supervised;
- the area where the machines are located is arranged so that it can be observed by staff of the operator or the licence holder; and
- at the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under 18."

- 11.2 This licensing authority is aware that the Gambling Commission is going to issue further guidance about the particular issues that licensing authorities should take into account in relation to the suitability and layout of bingo premises. This guidance will be considered by this licensing authority once it is made available.

12 Betting Premises

- 12.1 Betting Machines - This licensing authority will have regard to the Gambling Commission's Guidance, take into account the size of the premises, the number of counter positions available for person-to-person transactions, and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or

by vulnerable people, when considering the number/nature/circumstances of betting machines an operator wants to offer.

13 Tracks – (This section refers to where racing takes place, such as horse or greyhound racing) and other matters

- 13.1 This licensing authority is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. In accordance with the Gambling Commission's Guidance, this licensing authority will especially consider the impact upon the third licensing objective (i.e. the protection of children and vulnerable persons from being harmed or exploited by gambling) and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.
- 13.2 This authority will therefore expect the premises licence applicant to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young persons will be permitted to enter track areas where facilities for betting are provided on days when dog racing and/or horse racing takes place, but that they are still prevented from entering areas where gaming machines (other than category D machines) are provided
- 13.3 This licensing authority will expect applicants to offer their own measures to meet the licensing objectives however appropriate measures / licence conditions may cover issues such as:
- Proof of age schemes
 - CCTV
 - Supervision of entrances / machine areas
 - Physical separation of areas
 - Location of entry
 - Notices / signage
 - Specific opening hours
 - Self-baring schemes
 - Provision of information leaflets / helpline numbers for organisations such as GamCare
- 13.4 This list is not mandatory, nor exhaustive, and is merely indicative of example measures.
- 13.5 Gaming machines - Further guidance from the Gambling Commission is awaited as regards where such machines may be located on tracks and any special considerations that should apply in relation, for example, to supervision of the machines and preventing children from playing them. This licensing authority notes the Commission's Guidance that licensing authorities therefore need to consider the location of gaming machines at

- tracks, and applications for track premises licences will need to demonstrate that, where the applicant holds a pool betting operating licence and is going to use their entitlement to four gaming machines, these machines are located in areas from which children are excluded. Children and young people are not prohibited from playing category D gaming machines on a track.
- 13.6 Betting machines - This licensing authority will, having regard to the Gambling Commission's Guidance, take into account the size of the premises and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number /nature / circumstances of betting machines an operator wants to offer. It will also take note of the Gambling Commission's suggestion that licensing authorities will want to consider restricting the number and location of such machines in respect of applications for track betting premises licences.
- 13.7 Condition on rules being displayed - The Gambling Commission has advised in its Guidance for local authorities that "licensing authorities should attach a condition to track premises licences requiring the track operator to ensure that the rules are prominently displayed in or near the betting areas, or that other measures are taken to ensure that they are made available to the public. For example, the rules could be printed in the race-card or made available in leaflet form from the track office."
- 13.8 Applications and plans - This licensing authority awaits regulations setting-out any specific requirements for applications for premises licences but is in accordance with the Gambling Commission's suggestion "To ensure that licensing authorities gain a proper understanding of what they are being asked to license they should, in their licensing policies, set out the information that they will require, which should include detailed plans for the racetrack itself and the area that will be used for temporary "on-course" betting facilities (often known as the "betting ring") and in the case of dog tracks and horse racecourses fixed and mobile pool betting facilities operated by the Tote or track operator, as well as any other proposed gambling facilities." And that "Plans should make clear what is being sought for authorisation under the track betting premises licence and what, if any, other areas are to be subject to a separate application for a different type of premises licence."
- 13.9 This licensing authority also notes that in the Commission's view that it would be preferable for all self-contained premises operated by off-course betting operators on track to be the subject of separate premises licences, to ensure that there is clarity between the respective responsibilities of the track operator and the off-course betting operator running a self-contained unit on the premises.

14 Travelling Fairs

- 14.1 It will fall to this licensing authority to decide whether, and where category D machines and / or equal chance prize gaming without a permit is to be made available for use at travelling fairs, provided that the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.
- 14.2 The licensing authority will expect applicants to show how they will meet the licensing objectives, in particular in relation to children and young persons.
- 14.3 The licensing authority will also consider whether the applicant falls within the statutory definition of a travelling fair.
- 14.4 It has been noted that the 27-day statutory maximum for the land being used as a fair, is per calendar year, and that it applies to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land. This licensing authority will work with its neighbouring authorities to ensure that land which crosses our boundaries is monitored so that the statutory limits are not exceeded.

15 Provisional Statements ("in principle" licences where premises are not yet developed)

- 15.1 This licensing authority notes the Guidance for the Gambling Commission which states that "It is a question of fact and degree whether premises are finished to a degree that they can be considered for a premises licence" and that "Requiring the building to be complete ensures that the authority could if necessary inspect it fully".
- 15.2 In terms of representations about premises licence applications, following the grant of a provisional statement, no further representations from relevant authorities or interested parties can be taken into account unless they concern matters which could not have been addressed at the provisional statement stage, or they reflect a change in the applicant's circumstances.
- 15.3 In addition, the authority may refuse the premises licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters: -
- (a) which could not have been raised by objectors at the provisional licence stage; or
 - (b) which is in the authority's opinion reflect a change in the operator's circumstances.

16 Reviews:

16.1 Requests for a review of a premises licence can be made by interested parties or responsible authorities, however, it is for the licensing authority to decide whether the review is to be carried-out. This will be on the basis of whether the request for the review is relevant to the matters listed below, as well as consideration as to whether the request is frivolous, vexatious, will certainly not cause this authority to wish alter/revoke/suspend the licence, or whether it is substantially the same as previous representations or requests for review.

- in accordance with any relevant code of practice issued by the Gambling Commission;
- in accordance with any relevant guidance issued by the Gambling Commission;
- reasonably consistent with the licensing objectives; and
- in accordance with the authority's statement of licensing policy.
- The licensing authority can also initiate a review of a licence on the basis of any reason which it thinks is appropriate.

PART C - Permits / Temporary & Occasional Use Notice

1 Unlicensed Family Entertainment Centre Gaming Machine Permits

1.1 Where premises do not hold a premises licence but wishes to provide gaming machines, it may apply to the licensing authority for this permit. It should be noted that the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use

1.2 A licensing authority may prepare a statement of principles that they propose to consider in determining the suitability of an applicant for a permit and in preparing this statement, and/or considering applications, it need not (but may) have regard to the licensing objectives and shall have regard to any relevant guidance issued by the Commission

1.3 The Gambling Commission's Guidance for local authorities also states: "In their three year licensing policy statement, licensing authorities may include a statement of principles that they propose to apply when exercising their functions in considering applications for permit. Licensing authorities will want to give weight to child protection issues."

1.4 Guidance also states: "An application for a permit may be granted only if the licensing authority is satisfied that the premises will be used as an unlicensed Family Entertainment Centres, and if the chief officer of police has been consulted on the application. Licensing authorities might wish to consider asking applicants to demonstrate:

- a full understanding of the maximum stakes and prizes of the

gambling that is permissible in unlicensed Family Entertainment Centres;

- that the applicant has no relevant convictions and
- that staff are trained to have a full understanding of the maximum stakes and prizes.

1.5 It should be noted that a licensing authority cannot attach conditions to this type of permit.

1.6 Statement of Principles - This licensing authority will expect the applicant to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. The efficiency of such policies and procedures will each be considered on their merits, however, they may include appropriate measures / training for staff as regards suspected truant school children on the premises, measures / training covering how staff would deal with unsupervised very young children being on the premises, or children causing perceived problems on / around the premises. Location will also be expected to be dealt with, and it is the licensing authorities view that premises should not normally be licensed which are close to schools, playgrounds, or other educational establishments such as museums and places of worship.

1.7 This licensing authority will also expect that applicants demonstrate a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed Family Entertainment Centres; that the applicant has no relevant convictions and that staff are trained to have a full understanding of the maximum stakes and prizes.

2 (Alcohol) Licensed premises gaming machine permits

2.1 There is provision in the Act for premises licensed to sell alcohol for consumption on the premises, to automatically have 2 gaming machines, of categories C and/or D. Full definitions of the Gaming Machine Categories can be found on the Councils website; www.towerhamlets.gov.uk. The premises merely need to notify the licensing authority. In relation to all applications the licensing authority will use nationally recommended forms from LACORS as far as possible. The licensing authority can remove the automatic authorisation in respect of any particular premises if:

- provision of the machines is not reasonably consistent with the pursuit of the licensing objectives;
- gaming has taken place on the premises that breaches a condition of section 282 of the Gambling Act (i.e. that written notice has been provided to the licensing authority, that a fee has been provided and that any relevant code of practice issued by the Gambling Commission about the location and operation of the machine has been complied

- with);
 - the premises are mainly used for gaming; or
 - an offence under the Gambling Act has been committed on the premises
- 2.2 If a premises wishes to have more than 2 machines, then it needs to apply for a permit and the licensing authority must consider that application based upon the licensing objectives, any guidance issued by the Gambling Commission issued under Section 25 of the Gambling Act 2005, and “such matters as they think relevant..” The licensing authority will require that an application for more than two machines is considered against the above and the matters in 2.3 below before it is granted or refused.
- 2.3 This licensing authority considers that “such matters” will be decided on a case by case basis but generally there will be regard to the need to protect children and vulnerable persons from harmed or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machines. Measures which will satisfy the authority that there will be no access may include the adult machines being in sight of the bar, or in the sight of staff that will monitor that the machines are not being used by those under 18. Notices and signage may also be help.
- 2.4 As regards the protection of vulnerable persons applicants may wish to consider the provision of information leaflets / helpline numbers for organisations such as GamCare.
- 2.5 It is recognised that some alcohol licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would most likely need to be applied for, and dealt with as an Adult Gaming Centre premises licence.
- 2.6 The licensing authority can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for conditions (other than these) cannot be attached.
- 2.7 The holder of a permit must comply with any Code of Practice issued by the Gambling Commission about the location and operation of the machine.

3 Prize Gaming Permits

- 3.1 The licensing authority may “prepare a statement of principles that they propose to apply in exercising their functions under this Schedule” which “may, in particular, specify matters that the licensing authority propose to consider in determining the suitability of the applicant for a permit”.

- 3.2 This licensing authority has prepared a Statement of Principles which is that the applicant should set out the types of gaming that he or she is intending to offer and that the applicant should be able to demonstrate:
- that they understand the limits to stakes and prizes that are set out in Regulations;
 - and that the gaming offered is within the law.
- 3.3 In making its decision on an application for this permit the licensing authority does not need to have regard to the licensing objectives but must have regard to any Gambling Commission guidance.
- 3.4 It should be noted that there are conditions in the Gambling Act 2005 by which the permit holder must comply, but that the licensing authority cannot attach conditions. The conditions in the Act are:
- the limits on participation fees, as set out in regulations, must be complied with;
 - all chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played;
 - the prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
 - participation in the gaming must not entitle the player to take part in any other gambling.

4 Club Gaming and Club Machines Permits

- 4.1 Members Clubs and Miners' welfare institutes (but not Commercial Clubs) may apply for a Club Gaming Permit or a Clubs Gaming machines permit. The Club Gaming Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D), equal chance gaming and games of chance as set-out in forthcoming regulations.
- 4.2 A Club Gaming machine permit will enable the premises to provide gaming machines (3 machines of categories B, C or D).
- 4.3 Gambling Commission Guidance states: "Members clubs must have at least 25 members and be established and conducted "wholly or mainly" for purposes other than gaming, unless the gaming is permitted by separate regulations. It is anticipated that this will cover bridge and whist clubs, which will replicate the position under the Gaming Act 1968. A members' club must be permanent in nature, not established to make commercial profit, and controlled by its members equally. Examples include working

men's clubs, branches of Royal British Legion and clubs with political affiliations."

4.4 The Commission Guidance also notes that "licensing authorities may only refuse an application on the grounds that:

- a) the applicant does not fulfil the requirements for a members' or commercial club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied;
- b) the applicant's premises are used wholly or mainly by children and/or young persons;
- c) an offence under the Act or a breach of a permit has been committed by the applicant while providing gaming facilities;
- d) a permit held by the applicant has been cancelled in the previous ten years; or
- e) an objection has been lodged by the Commission or the police.

4.5 There is also a 'fast-track' procedure available under the Act for premises which hold a Club Premises Certificate under the Licensing Act 2003 (Schedule 12 paragraph 10). As the Gambling Commission's Guidance for local authorities states: "Under the fast-track procedure there is no opportunity for objections to be made by the Commission or the police, and the ground upon which an authority can refuse a permit are reduced." And "The grounds on which an application under the process may be refused are:

- (a) that the club is established primarily for gaming, other than gaming prescribed under schedule 12;
- (b) that in addition to the prescribed gaming, the applicant provides facilities for other gaming; or
- (c) that a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled."

4.6 There are statutory conditions on club gaming permits that no child uses a category B or C machine on the premises and that the holder complies with any relevant provision of a code of practice about the location and operation of gaming machines.

5 Temporary Use Notices

5.1 The granting of a temporary use notice allows premises without a premises licence to be used by a gambling operator temporarily to provide facilities for gambling

- 5.2 Licensing authorities are being asked to mindful of the restrictions that allow premises to be licensed for at the most 21 days per year under Temporary Use Notices
- 5.3 It is possible licence part of a building or set of premises if the location can be rightfully regarded as being separate in terms of ownership, occupation and control.
- 5.4 This authority will object to a Temporary Use Notice application if it appears that regular gambling is taking place in locations the could be described as one set of premises.

6 Occasional Use Notices

- 6.1 Occasional Use Notices relate to occasional "track" uses. Betting Track is usually thought of as horse or dog racing. These notices will be for events like point to points on agricultural land.
- 6.2 The licensing authority has very little discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. This licensing authority will though consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.

PART D

1 Administration, Exercise and Delegation of Functions

- 1.1 The Council will be involved in a wide range of licensing decisions and functions and has established a Licensing Committee to administer them.
- 1.2 Appreciating the need to provide a speedy, efficient and cost-effective service to all parties involved in the licensing process, the Committee has delegated certain decisions and functions and has established a number of Sub-Committees to deal with them.
- 1.3 Further, with many of the decisions and functions being purely administrative in nature, the grant of non-contentious applications where no representations have been made has been delegated to Council Officers. All such matters dealt with by Officers will be reported for information and comment only to the next Committee meeting. The decisions cannot be reversed.
- 1.4 The following Table sets out the agreed delegation of decisions and functions to Licensing Committee, Sub-Committees and Officers.

- 1.5 This form of delegations is without prejudice to Officers referring an application to a Sub-Committee, or a Sub-Committee to Full Committee, if considered appropriate in the circumstances of any particular case.

1 TABLE OF DELEGATIONS OF LICENSING FUNCTIONS

MATTER TO BE DEALT WITH	BY WHOM
Three year licensing policy (responsibility shared with Cabinet) Policy to permit or not to permit casinos	THE FULL COUNCIL
Fee Setting- (but when appropriate Corporate Director) Application - for a premises licence, variation of a premises licence, transfer of a premises licence, application for a provisional statement in connection with a premises, in all cases where representations have been received and not withdrawn. Review- of a premises licence. Application for, or cancellation of club gaming /club machine permits where representations have been received and not withdrawn Decision to give a counter notice to a temporary use notice	LICENSING COMMITTEE/ SUB-COMMITTEE
For a premises licence, variation of a premises licence, transfer of a premises, application for a provisional statement in connection with a premises, in all cases where no representations have been received/ or representations have been withdrawn. Application for a club gaming machine/ club machine permit where no representations received/ representations have been withdrawn. Applications for other permits Cancellation of licensed premises gaming machine permits Consideration of temporary use notice	OFFICERS

Annexes

Annex 1 Map of London Borough of Tower Hamlets showing where Gambling Premises Licences have been issued

Annex 2 Details of those consulted.

Annex 3 Results of Consultation

Annex 4 Gambling Best Practice Guide

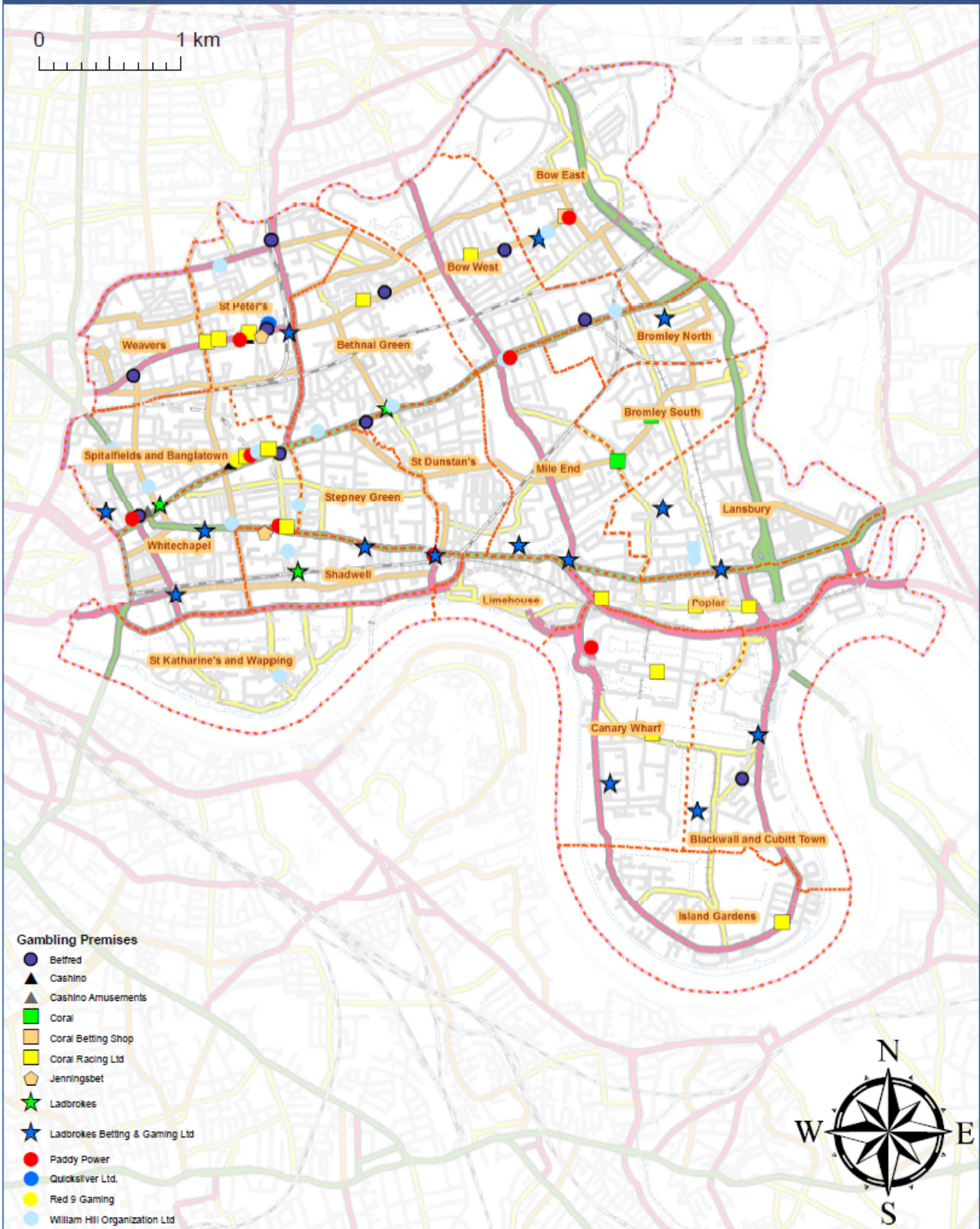
Annex 5 Sample conditions

Annex 6 Local area profiles

Annex 1



Gambling Premises



Annex 2

List of consultees:

Authorities/Bodies

The Gambling Commission
Metropolitan Police Service
Her Majesty's Revenue and Customs
Directorate of Development & Renewal (LBTH)
London Fire & Emergency Planning Authority
Maritime & Coastguard agency
Service Manager Child Protection & Reviewing
Canal & River Trust
The Environment Agency
NSPCC
Tower Hamlets Primary Care Trust
Young Mayor and Youth Panel
Inter Faith Forum
CCG
Council of Mosques
Adults Safeguarding Board
Community Safety Partnership
Public Health

Gambling Support Services

GamCare
Gamblers Anonymous
Responsibility in Gambling Trust

Businesses

Agora Betting (UK) Ltd
Arcade Shop
Bet Share Racing
Betex
Betfred Ltd
Better
Betting Shop Services Ltd
Canary Wharf Sports Exchange Ltd
Carousel Amusements
Cashino
Collins Bookmakers

Coral Racing Ltd
Frankice (Golders Green) Ltd
Gala Coral Group
Gold Room
Grove Leisure Ltd
Joe Jennings Bookmakers Ltd
Ladbrokes Betting & Gambling Ltd
Leisure World (UK) Ltd
Lucky 8 Limited
Paddy Power Limited
Quicksilver Limited
Roar Betting
Roma
Shirt Hot Limited
Talarus Ltd
Tote Bookmakers
TWL Holdings Limited
Two Way Media Ltd
William Claridge Ltd
William Hill Organisation Ltd

Licensing Committee Members

Khales Uddin Ahmed (Chair)
Rajib Ahmed (Member)
Mahbub Alam (Member)
Shah Alam (Member)
Gulam Kibria Choudhury (Member)
Amy Whitelock Gibbs (Member)
Peter Golds (Vice-Chair)
Clare Harrisson (Member)
Denise Jones (Member)
Md. Maium Miah (Member)
Mohammed Mufti Miah (Member)
Muhammad Ansar Mustaquim (Member)
Joshua Peck (Member)
Candida Ronald (Member)
Rachael Saunders (Member)

Housing Associations

A 2 Dominion Housing
Eastend Homes
Gateway Housing
Mitali Housing Association
One Housing Group
Poplar Harca
Peabody Housing Association
Spitalfields Housing Association
Tower Hamlets Community Housing

Tower Hamlets Homes
Oxford House
Industrial Dwellings Society
Karin Housing Association
Look Ahead Housing Care
Newlon
Old Ford Housing Association
Peter Bedford Housing Association
Reside Housing Association Ltd
South Poplar and Limehouse Action for Secure Housing
St Margarets House Settlement
The Kipper Project

Annex 3

Responses to the Gambling Policy Consultation 2016

<i>Body or Organisation</i>	<i>Summary of issues</i>
<i>Overview and Scrutiny January 2016</i>	<ul style="list-style-type: none"> • <i>Concern expressed on the number of FOBT's</i> • <i>Impact of FOBT's on quality of life of those poorer residents that gamble</i> • <i>Provision of services to addicted gamblers</i> • <i>Consider what other Councils are doing regarding FOBT's</i> • <i>Encourage schools to address negative impacts of gambling through PHSE</i> • <i>Consultation to reach out to greatest number of individuals and organisations as possible</i> • <i>LBTH to lobby for legislative changes</i> • <i>Consideration on control of advertising on Council sites</i>
<i>Campaign for Fairer Gambling</i>	<ul style="list-style-type: none"> • <i>Commission of test purchasing of premises and staff employed on those premises to transact gambling</i> • <i>Evaluate the effectiveness of self-exclusion, under age controls, anti-money laundering policies</i> • <i>Police call outs in the first nine months of 2014 were up 20% on the previous year</i> • <i>Consideration of condition against lone working policies</i> • <i>Use powers to restrict the number of FOBT's in betting shops</i> • <i>Suggest a statement supporting further regulatory action against FOBT's</i>
<i>Public Health</i>	<ul style="list-style-type: none"> • <i>More detail on how local risk assessments should be undertaken in relation to schools, places of worship and hostels</i> • <i>How licensed premises will support vulnerable people</i> • <i>Detail on how employers protect their staff – lone working and anti-social hours</i>
<i>Member of the Public</i>	<ul style="list-style-type: none"> • <i>Far too many betting shops in Tower Hamlets</i> • <i>Licenses only granted if no other shops in a mile and if the area is not one of low income/youth vulnerability</i> • <i>Gambling addiction support to be offered in Bengali, Hindi and Punjab</i> • <i>Gamcare is not enough</i>
<i>Coral Racing Ltd</i>	<ul style="list-style-type: none"> • <i>Has 1850 Betting shops, 20% of all betting shops in Great Britain</i> • <i>No evidence that betting shops within a proximity of schools causes harm</i> • <i>Local risk assessments to be specific to the licensing objectives and to assess whether control measures are going beyond the standard control measures that are needed.</i>
<i>William Hill</i>	<ul style="list-style-type: none"> • <i>17 premises in Tower Hamlets, largest retailer in the UK</i> • <i>Concerned that the Council is attempting to fashion an illegal exclusionary policy which reverses the burden of proof required in gambling licensing cases.</i> • <i>Cannot impose additional licence conditions without clear evidence to support such an imposition</i> • <i>Risk assessments can only be based on evidenced factors that are underpinned by empirical evidence</i> • <i>Local area profiles to be focused on aspects of gambling related harm that are evidenced</i> • <i>No legitimate justification for routine submission of information to the</i>

	<p><i>Council, under age test purchasing data is already supplied to the Primary Authority Partner and reports other related information to the Gambling Commission</i></p> <ul style="list-style-type: none"> • <i>Self-exclusion numbers does not assist the Council to form a view of gambling related harm, it cannot be used as a proxy for assessment of gambling related harm.</i> • <i>It is not for Operators to satisfy the Council that the location of premises would be harmful to the licensing objectives, only that facilities are being operated in a way that is reasonably consistent with the Licensing Objectives.</i> • <i>No go areas cannot be fashioned from areas of deprivation/ethnic make-up – this is discriminatory in relation to the aim to permit gambling and human rights</i> • <i>The presence of schools and playgrounds cannot be used as a reason to exclude a gambling premises from an area</i> • <i>Crime should be defined as crime associated with gambling, not situational crime committed against operators or its staff.</i> • <i>Need to define the distinction between disorder and mere public nuisance.</i> • <i>Should not mandate matters within the local area risk assessment – against better regulation principles</i> • <i>Sample conditions – should be removed, clear evidenced risk to be provided before such conditions can be used</i> • <i>Unlawful to include religious buildings in the local area profiles</i> • <i>Council has mis-directed itself in law, the language in the policy betrays the fact that the intention is to use it in an exclusionary way, thereby undermining ‘the aim to permit’ principle.</i>
<p><i>Power Leisure Bookmakers Ltd</i></p>	<ul style="list-style-type: none"> • <i>Paddy Power has 325 betting offices in the UK</i> • <i>Regulators (as per the Regulators Code) should recognise the compliance record and take an evidenced based approach to determining priority risks in their area. Risks need to be evidenced and controls proportionate</i> • <i>The draft policy does not adhere to better regulation</i> • <i>Additional conditions only to be imposed in circumstances where it is evidenced that risk are identified. They should not be included in the draft statement of gambling policy.</i> • <i>A blanket request for information relating to crime and disorder may be disproportionate and place an excessive regulatory burden on operators</i>
<p><i>Association of British Bookmakers</i></p>	<ul style="list-style-type: none"> • <i>Current regime offers key protections for communities</i> • <i>Planning law changes in April 2015 have increased the ability for Councils to consider betting shop applications.</i> • <i>In 2015, a decline of 179 betting shops nationally</i> • <i>Problem gambling is at 0.6% and has been stable</i> • <i>LGA – ABB Betting Partnership Framework signed in January 2015</i> • <i>Establishment of Primary Authority Partnerships with Councils</i> • <i>Councils should not prescribe the local risk assessment form</i> • <i>Local area profiles to be supported by substantive evidence</i> • <i>Additional conditions only imposed in exceptional circumstances</i> • <i>Delete reference to areas of deprivation and ethnic profile of residents as these have no bearing on the licensing objectives.</i> • <i>Additional conditions list – statement to be added in to make it clear that these can only be imposed if there is a risk to the licensing objectives</i> • <i>Local profile should not cover issues relating to religious buildings, the night time economy and social-economic make-up of the area.</i>

Annex 4: Gambling Best Practice Guide

We expect all Gambling premises in the Borough to carry out the measures listed in this Best Practice Guide along with the measures detailed in the main Policy. This guide is about businesses that promote gambling have the responsibility in protecting the vulnerable who may be exposed by their activities.

- All premises to hold and maintain a log of incidences and the handling of problem gambling that occur in the premises. This information should be shared with Licensing Officers on request. Relevant data that should be held include the date and a short description of the intervention in relation to voluntary/mandatory exclusions and whether individuals have tried to gain entry, attempts of those that are underage to gain entry whether with an adult or not. Any incident requiring an intervention from staff
- Staff should be aware on how to tackle irresponsible gambling and have sufficient knowledge on how to promote responsible gambling. Be able to signpost customers to support services with respect to problem gambling, financial management and debt advice. Leaflets on how to identify problem gambling should available for customers in the premises.
- Staff should be aware of the importance of social responsibility, the causes and consequences of problem gambling, intervention with vulnerable persons, dealing with the exclusion of problem gamblers and escalating them for advice or treatment.
- Staff should be aware of refusing customers entry due to alcohol or drugs, age verification processes, identifying forged ID, the importance of time and spend limits
- Staff to be familiar with the offences under the Gambling Act, the categories of gaming machines, the stakes and odds associated with each machine.
- Staff should also be aware of not encouraging customers to increase the amount or time they gamble, re-gamble winnings and chase losses.
- Staff to be excluded from gambling at the premises where they are employed and the premises to have a 'no tipping' rule.
- Applicants may wish to seek support with their applications from the Crime Reduction Officer and GamCare with a view to obtaining a certificate of Social Responsibility.
- Where Fixed Odds Betting Terminals are installed within the premises they should be positioned in direct sight of a supervised counter.

Appendix 5: Sample of premises licence conditions

This Annex, reproduced from the Gambling Commission's Guidance to Licensing Authorities, provides a sample of conditions that have been attached to premises licences by licensing authorities, with some amended for illustrative purposes. These are not blanket conditions but have been imposed in a number of circumstances to address evidence based concerns. Part 9 of the Gambling Commission's Guidance to Licensing Authorities provides further details on the principles licensing authorities should apply when exercising their discretion to impose premises licence conditions.

The conditions listed below have been grouped under specific headings for ease of reference. There will inevitably be some overlap between those conditions that address different concerns, for example those related to security and to anti-social behaviour.

1. Security

- 1.1 No pre-planned single staffing after 8pm and, when this is unavoidable, for a Maglock to be in constant use.
- 1.2 A minimum of two members of staff after 10pm.
- 1.3 A minimum of two members of staff will be on duty throughout the whole day.
- 1.4 The premises will have an intruder alarm and panic button.
- 1.5 Maglock systems are employed and access is controlled.
- 1.6 Requirements for full-height security screens to be installed.
- 1.7 A requirement for 50% of the shop frontage to be clear of advertising so that staff have a clear view and can monitor the exterior of the premises.
- 1.8 The premise shall maintain a 'safe haven' to the rear of the counter.
- 1.9 The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of a Metropolitan Police Crime Prevention Officer. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Recordings shall be made available immediately upon the request of Police or an authorised officer throughout the preceding 31-day period.
- 1.10 A member of staff from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises are open to the public. This member of staff must be able to show a member of the police or authorised council officer recent data or footage with the absolute minimum of delay when requested.
- 1.11 A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering the premises.
- 1.12 If at any time (whether before or after the opening of the premises), the police or licensing authority supply to the premises names and/or

photographs of individuals which it wishes to be banned from the premises, the licensee shall use all reasonable endeavours to implement the ban through staff training.

2. Anti-social behaviour

- 2.1 The Licensee shall develop and agree a protocol with the police as to incident reporting, including the type and level of incident and mode of communication, so as to enable the police to monitor any issues arising at or in relation to the premises.
- 2.2 The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.
- 2.3 The Licensee shall place a notice visible from the exterior of the premises stating that drinking alcohol outside the premises is forbidden and that those who do so will be banned from the premises.
- 2.4 Notices indicating that CCTV is in use at the premises shall be placed at or near the entrance to the premises and within the premises.
- 2.5 The Licensee shall place and maintain a sign at the entrance which states that 'only drinks purchased on the premises may be consumed on the premises'.
- 2.6 The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
- 2.7 The Licensee shall install and maintain an ultraviolet lighting system in the customer toilet.
- 2.8 The Licensee shall install and maintain a magnetic door locking system for the customer toilet operated by staff from behind the counter.
- 2.9 Prior to opening the Licensee shall meet with the Crime Prevention Officer in order to discuss any additional measures to reduce crime and disorder.

3. Underage controls

- 3.1 The Licensee shall maintain a bound and paginated 'Think 21 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.
- 3.2 Customers under 21 will have to provide ID.
- 3.3 The premises will operate a 'challenge 25' policy and prominent signage and notices will be displayed showing the operation of such policy
- 3.4 Compulsory third party test purchasing on a twice yearly external system and the results to be reported to the Local Authority and police. In the first twelve months (from the date of the Review) two additional internal test purchase operations to be carried out.
- 3.5 A physical barrier (ie a supermarket metal type or similar) acceptable to the licensing authority, and operated in conjunction with the existing monitored alert system, to be put in place within 3 months from the date of the review.
- 3.6 No machines in the Unlicensed Family Entertainment Centre to be sited

within one meter of the Adult Gaming Centre entrance.

4. Player protection controls

- 4.1 Prominent GamCare documentation will be displayed at the premises.
- 4.2 There shall be no cash point or ATM facilities on the premises.
- 4.3 The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in the training shall be formally recorded and the records produced to the police or licensing authority upon request.
- 4.4 New and seasonal staff must attend induction training. All existing staff must attend refresher training every six months.
- 4.5 All notices regarding gambling advice or support information within the vicinity of XXX must be translated into both simplified and local languages.
- 4.6 Infra Red Beam to be positioned across the entrance to the premises.
To be utilised whenever:
 - (a) The first member of staff is not positioned within the Cash Box or,
 - (b) The second member of staff is not on patrol

Annex 6

Local Area Profiles

The aim of local area profiles is to build up a picture of the locality, and in particular the elements of it that could be impacted by gambling premises.

The Council publishes Area profiles – ward profiles on its website at http://www.towerhamlets.gov.uk/lgs/901-950/916_borough_profile/area_profiles.aspx


Some publically available sources of information to assist in operators completing a Local Area Profile include:

- a) Crime Mapping websites*
- b) Ward profiles*
- c) Websites or publications by local responsible authorities*
- d) Websites or publications by local voluntary schemes and initiatives*
- e) On-line mapping tools*

The Council will expect applicants for grant of new or variation to existing licences to include full details of their risk assessment in compliance with Social Responsibility (SR code) 10.11 and Ordinary code provisions 10.1.2 (both effective from 6th April 2016)

Appendix Two

EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

Name of 'proposal' and how has it been implemented (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)	Gambling Policy 2016 Review
Directorate / Service	CLC / Safer Communities
Lead Officer	David Tolley, Head of Environmental Health and Trading Standards
Signed Off By (inc date)	
Summary – to be completed at the end of completing the QA (using Appendix A) (Please provide a summary of the findings of the Quality Assurance checklist. What has happened as a result of the QA? For example, based on the QA a Full EA will be undertaken or, based on the QA a Full EA will not be undertaken as due regard to the nine protected groups is embedded in the proposal and the proposal has low relevance to equalities)	 Proceed with implementation As a result of performing the QA checklist, the policy does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.

Page 103

Stage	Checklist Area / Question	Yes / No / Unsure	Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)
1	Overview of Proposal		
a	Are the outcomes of the proposals clear?	Yes	The decision making body is recommended to:


			<ul style="list-style-type: none"> • Agree the proposed Gambling Policy • Note that the 'no casino' resolution remain within the Gambling Policy. <p>All local authorities have to review and adopt a gambling policy every three years which defines how they will administer and exercise their responsibilities under the Gambling Act 2005.</p> <p>The Gambling Policy is prescribed by the central government and the Gambling Commission. The policy is compatible with this advice and guidance.</p> <p>Some of the major issues and concerns about gambling, including gambling addiction, are not addressed in the policy. Also, noise nuisance is not a licensing objective. Any issues relating to noise and nuisance will be dealt with by the Council's noise team.</p>
<p>b</p>	<p>Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)? Is there information about the equality profile of those affected?</p>	<p>Yes</p>	<p>The Gambling Policy states how the Licensing Authority will exercise its authority. This policy covers the following:</p> <ul style="list-style-type: none"> • How the Licensing Authority will use its regulatory powers in relation to applications and reviews of the activities it regulates, to the extent it is allowed by statute. • The main licensing objective for the authority is protecting children, preventing crime and disorder and ensuring gambling is fair and open. • The Licensing Authority approach to regulation • The scheme of delegation <p>The licencing objectives remain including protecting children and the vulnerable, including 'people may not be able to</p>

			<p>make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs.’</p> <p>The business operators will be requested to undertake local risk assessments in relation to their premises. It is expected that the local risk assessment will consider various issues including exposure to vulnerable groups, type of footfall (e.g. children, families), education facilities and homelessness/ rough sleeper hostels. The local risk assessment is also expected to identify how these risks will be mitigated and monitored.</p>
2	Monitoring / Collecting Evidence / Data and Consultation		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	<p>The Gambling Policy is prescribed by the central government and the Gambling Commission. The policy is compatible with this advice and guidance.</p> <p>Regarding the business related data, the Development and Renewal (D&R) directorate have corporate lead responsibility for data capture and are currently reviewing the technical implications in developing an equalities strand of their business data base.</p>
	Is there sufficient evidence of local/regional/national research that can inform the analysis?	Yes	<p>Gambling premises will undertake a risk assessment taking into consideration their local information.</p> <p>The gambling policy is compatible with this advice and guidance by the central government and the Gambling Commission.</p>
b	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Yes	<p>As above. Also, a statutory consultation process commenced on 19 October 2015 and continued for three months, until 17 January 2016. The draft policy has also been consulted by the Licensing Committee on 4 December 2015 and the Overview and Scrutiny Committee on 4 January 2016. The comments received have been analysed and incorporated into the policy where necessary.</p>

c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	A statutory consultation process commenced on 19 October 2015 and continued for three months, until 17 January 2016.
3	Assessing Impact and Analysis		
a	Are there clear links between the sources of evidence (information, data etc) and the interpretation of impact amongst the nine protected characteristics?	Yes	The gambling policy is compatible with this advice and guidance by the central government and the Gambling Commission. The licencing objectives remain including protecting children and the vulnerable, including 'people may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs.'
b	Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups?	N/A	
4	Mitigation and Improvement Action Plan		
a	Is there an agreed action plan?	Yes	The policy will be agreed by the full Council. All local authorities have to review and adopt a gambling policy every three years which defines how they will administer and exercise their responsibilities under the Gambling Act 2005.
b	Have alternative options been explored	Yes	The Gambling Policy is prescribed by the central government and the Gambling Commission.
5	Quality Assurance and Monitoring		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	All local authorities have to review and adopt a gambling policy every three years which defines how they will administer and exercise their responsibilities under the Gambling Act 2005.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics?	Yes	The policy includes a number of measures to prevent children from taking part in gambling and restriction of advertising so that gambling products are not aimed at or are attractive to children.

			<p>The licensing authority will consider whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrances/ machines, segregation of areas.</p> <p>The policy also states that local risk assessment may include arrangements for monitoring and dealing with under age persons and vulnerable persons.</p>
6	Reporting Outcomes and Action Plan		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	Yes	

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Decision Report Cover Sheet: Council 5 December 2016	 TOWER HAMLETS
Cover Report of: Matthew Mannion, Committee Services Manager	Classification: Unrestricted
Community Safety Partnership Plan 2013-16 Year 4 (2016/17)	

Originating Officer(s)	Matthew Mannion, Committee Services Manager (Cover Report)
Wards affected	All Wards

Summary

The review of the Community Safety Partnership Plan was presented to Cabinet on 4 October 2016 where it was considered by the Mayor and Cabinet Members. The Mayor agreed that the Year 4 Plan should be recommended to Council for approval.


The Report and Appendices are attached to this Cover Sheet.

Recommendations:

The Council is recommended to:

1. Agree the Community Safety Plan 2013-16: Year 4 (2016/17) Plan be adopted.

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Cabinet Decision 4 October 2016	 TOWER HAMLETS
Report of: Will Tuckley, Chief Executive and Acting Corporate Director – Communities, Localities and Culture	Classification: Unrestricted
Community Safety Partnership Plan 2013-16 Year 4 (2016/17)	

Lead Member	Councillor Shiria Khatun, Deputy Mayor and Cabinet Member for Community Safety
Originating Officer(s)	Andy Bamber – Service Head Safer Communities Shazia Ghani – Head of Community Safety
Wards affected	All wards
Key Decision?	Yes
Community Plan Theme	A Safe and Cohesive Community

Executive Summary

This report sets out the Community Safety Partnership's (CSP) reviewed CSP Plan 2013-16 for the final year of its 4 year term 2016/17.

The CSP has an annual duty to review its Community Safety Partnership Plan known as a Crime and Disorder Reduction Strategy under the Crime and Disorder Act and should do this based on its annual Strategic Assessment. Under the Council Constitution, this Crime and Disorder Reduction Strategy, known here as the Community Safety Partnership Plan must be approved by Full Council as the Council is statutorily obliged to adopt one.

The Community Safety Partnership Plan 2013-16 revised for Year 4 (2016/17) has been reviewed by the CSP Subgroup Chairs and agency leads from the responsible authorities (statutory partners), prior to discussion and approval by the CSP on 18th July 2016. The CSP has reviewed its priorities for the final year of the current Plan and is presenting the revised Plan to the Councils Executive to agree its progression to Full Council as required by the constitution for adoption.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the content of the Community Safety Partnership Plan 2013-16 Year 4 (2016/17) included as appendix 1 to this report
2. Note the content of this report and the decision made by the Partnership to:
 - 2.1. include Prevent as a standalone CSP Priority for 2016/17
 - 2.2. remove the duplication between current Priority Themes by absorbing the Serious Acquisitive (Property) Crime under the MOPAC 7 Cross-cutting Priority Theme for 2016/17
3. Agree this report and the CSP Plan 2013-16: Year 4 (2016/17) and recommend to Full Council that the Year 4 Plan be adopted.

1. REASONS FOR THE DECISIONS

- 1.1 Full Council must adopt a Community Safety Partnership Plan in order to meet statutory requirements set by the Crime and Disorder Act (1998). Under the Article 4 of the Council Constitution, Council approval for the CSP Plan can only be granted at Full Council.
- 1.2 The priorities and governance structure outlined in the Plan are based on the statutory strategic assessment exercise that was carried out by statutory partners to consider data on safety in the Borough. They have been agreed by the Community Safety Partnership in July 2016 to be the best model to deliver a safer and more cohesive community in Tower Hamlets. The Cabinet are asked to consider the reviewed Plan, along with the CSP decision to update its priorities to include Prevent as a Standalone CSP Priority and remove Serious Acquisitive (Property) Crime as it is covered under Cross-cutting Priority MOPAC 7 and satisfy itself that it can proceed to Full Council.
- 1.3 The reviewed CSP Plan is attached as Appendix 1 to this report.

2. ALTERNATIVE OPTIONS

- 2.1 It is a statutory responsibility for Community Safety Partnerships to produce a Community Safety Plan and then annually review the contents. Full Council must adopt a Community Safety Partnership Plan in order to meet statutory requirements set by the Crime and Disorder Act (1998). There are therefore no alternative options to doing so without risking government censure, damaging key partner relationships and undermining community safety.

3. DETAILS OF REPORT

- 3.1 There is a legal requirement for each Community Safety Partnership (Safe & Cohesive CPDG in Tower Hamlets) to have a Community Safety Partnership Plan, historically known as a Crime and Disorder Reduction Strategy. The Plan is owned and developed by the Community Safety Partnership of which the Council is a key partner.
- 3.2 In order to fulfil our other statutory duties, the CSP produced an annual Strategic Assessment in late 2015/16, which enabled it to review the current 4 year Plan at the end of year 3.
- 3.3 The CSP met on the 3rd May 2016 to review the CSP Plan based on the findings of the CSP Strategic Assessment 2015.
- 3.4 As a result of this review process and following feedback during the Council approval process from the previous (2015) year-end CSP Plan review, it was decided that one area of concern (Prevent) which was originally included under the CSP Plan Priority Theme Hate Crime and Cohesion, warranted recognition as standalone priority in the Plan.
- 3.5 The CSP also agreed that there was duplication between the Serious Acquisitive (Property) Crime Priority Theme and the Cross-cutting Priority MOPAC 7, which also included the key acquisitive crimes. The decision was made that MOPAC 7 would sufficiently cover the property crimes which were priorities for the Partnership, and that the Priority Theme Serious Acquisitive (Property) Crime would be removed from the reviewed CSP Plan 2013-16 Year 4 (2016/17).
- 3.6 The Community Safety Partnership Plan 2013-16 Year 4 (2016/17) has been reviewed by the CSP Subgroup Chairs and agency leads from the responsible authorities (statutory partners), prior to discussion and approval by the CSP on 18th July 2016.
- 3.7 The CSP Plan 2013-16 Year 4 (2016/17) includes a summary of the Strategic Assessment 2015, an updated Partnership Governance Structure, highlights and performance for 2015/16 financial year and the 11 agreed Priority Themes for this final year of the Plan's 4 year term.
- 3.8 The CSP's Priority Themes for 2016/17 are:
- Gangs and Serious Youth Violence
 - Anti-Social Behaviour and Arson
 - Drugs and Alcohol
 - Violence (inc. Domestic Violence and Violence Against Women and Girls)
 - Prostitution
 - Hate Crime and Cohesion
 - Killed or Seriously Injured (on our roads)
 - Prevent
 - Cross-cutting Priorities:

- Public Confidence and Victim Satisfaction
- Reducing Re-offending
- MOPAC 7

3.9 MOPAC 7 are the priority crimes for the Mayor of London's Office for Policing and Crime (MOPAC). The Metropolitan Police Service has been set targets for an overall 20% reduction in the life of its Police and Crime Plan 2013-16, which expires on 31st March 2017. MOPAC 7 is made up of the following priority neighbourhood crimes, which MOPAC believe have the greatest impact on the community and their fear of crime. The MOPAC 7 comprise

- Burglary
- Criminal Damage
- Robbery
- Theft from Motor Vehicle
- Theft / Taking of Motor Vehicle
- Theft from Person
- Violence with Injury

3.10 The Plan's 11 Priority Themes are made up of 8 stand-alone priority themes with one or two CSP subgroups responsible for activity in the form of an annual Subgroup Action Plan. The remaining three Cross-cutting Priority Themes are the responsibility of all the CSP Subgroups, as their work within the other priorities impacts on these.

3.11 Both the Equalities Considerations and Equalities Analysis – Initial Screening Document are attached as appendix 2 and 3 respectively.

3.12 Next Steps for the CSP:

- The CSP is currently conducting a public consultation on new community safety priorities for April 2017 onwards, the findings of which will be considered when drafting the New CSP Plan 2017-21.
- The CSP is currently in the process of obtaining data and analysis for their 2016 Strategic Assessment, which looks at the financial years 2015/16 compared to 2014/15 and will also be considered when drafting the New CSP Plan 2017-21.
- The CSP will consider partners, local, London (inc. MOPAC), Regional and National priorities to produce the New CSP Plan 2017-21 in September 2016
- The CSP Co-chairs have reviewed the Community Safety Partnership structure and operating procedures in order to ensure that the Partnership can effectively and efficiently carry out its statutory duties in the future. Proposals from this Review will be presented to the CSP along with draft Strategic Assessment and New Community Safety Plan 2017-21 at a Performance and Planning Workshop on 27th September 2016.
- The Council along with key partners in Police, Public Health (including Mental Health), Drug and Alcohol Action Team and Housing Providers in the Borough recognise the detrimental impact anti-social behavior has on residents in the borough and it remains an important priority for the

partnership to address. In addition to the work outlined in the reviewed CSP Plan for 2016/17 under this current priority theme, senior officers within the aforementioned agencies have agreed to develop a Partnership ASB Strategy and detailed Action Plan in 2016/17 for the coming years. This will aim to address ASB as a significant priority for the borough and its key partners for years to come.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 The report sets out the review of the Community Safety Partnership Plan 13-16 extended for a further year to cover the period of 2016/17. The funding for the CSP Plan is met from the Community Safety Partnership, Domestic Violence and Hate Crime budget of £1.57m. In addition there is MOPAC funding allocation which remains at £811k for the financial year 2016/17. Also highlighted in the plan is that up to £1m was received over the previous three years from external sources such as MOPAC, Department for Education, and the Department for Communities and Local Government that supplemented the funding provision.
- 4.2 Given the financial constraints being faced by the Council and other partners, it is imperative that funding levels for the service are considered fully as part of the Council's Outcomes Based Budgeting approach for 2017 -2020. This will include the identification of complementary funding and consideration of the most effective way to respond to this area of work alongside the Council's wider priorities.
- 4.3 Consequently whilst there are no direct financial implications emanating from the review of the current year plan, the extent to which funding at the levels previously seen will continue to be available must be a consideration of the Medium Term Financial Strategy (MTFS) process.

5. LEGAL COMMENTS

- 5.1 This report relates to review of the Council's existing Community Safety Partnership Plan. There is a statutory requirement for such a Plan as the Council is one of the responsible authorities for Tower Hamlets, within the meaning of section 5 of the Crime and Disorder Act 1998 ('the 1998 Act'). Other responsible authorities for Tower Hamlets include: every provider of probation services in Tower Hamlets; the chief officer of police whose police area lies within Tower Hamlets; and the fire and rescue authority for Tower Hamlets. Together, the responsible authorities for Tower Hamlets are required to formulate and implement strategies for: the reduction of crime and disorder; combating the misuse of drugs, alcohol and other substances; and the reduction of reoffending pursuant to section 6 of the 1998 Act. When formulating and implementing these strategies, each authority is required to have regard to the police and crime objectives set out in the police and crime plan for Tower Hamlets.

- 5.2 Additionally, when considering the review of this Plan regard must be had to section 17 of 1998 Act and which places an obligation of the Council to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area.
- 5.3 The Crime and Disorder (Formulation and Implementation of Strategy) Regulations 2007 require that there be a strategy group whose functions are to prepare strategic assessments, following community engagement, and to prepare and implement a partnership plan and community safety agreement for Tower Hamlets. The partnership plan must set out a crime and disorder reduction strategy, amongst other matters. The strategy group must consider the strategic assessment and the community safety agreement in the formulation of the partnership plan. The Community Safety Partnership Board discharges these functions in Tower Hamlets.
- 5.4 With regard to consultation, regulations 12 to 14A of the Crime and Disorder (Formulation and Implementation of Strategy) Regulations 2007 provide for Community Engagement. Further, in consulting, the Council must comply with the common law principles set out in *R v Brent London Borough Council, ex p Gunning*, (1985) and recently approved by the Supreme Court in *R(Mosely) v LB Haringey 2014*. Those are *'First, that consultation must be at a time when proposals are still at a formative stage. Second, that the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response. Third that adequate time must be given for consideration and response. And finally, fourth, that the product of consultation must be conscientiously taken into account in finalising any statutory proposals.'* There is no prescribed period for consultation, but principles of fairness apply such that there should be sufficient time for those being consulted to consider and respond to the matters arising, having regard to their complexity, impact etc. It is necessary to comply with the common law requirement to consider any feedback before making a decision.
- 5.5 Public consultation on new community safety priorities for April 2017 onwards is underway in preparation for the new Community Safety Partnership Plan 2017-21 and the consultation responses must be conscientiously taken into account before the final adoption of this new plan.
- 5.6 Under Article 4 of the council's constitution, the adoption of the Community Safety Partnership Plan is a function for full Council. This reflects the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended) which provide that the making of a crime and disorder reduction strategy pursuant to sections 5 and 6 of the 1998 Act is a function that is required not to be the sole responsibility of the Council's executive. Under the Council's Budget and Policy Framework Procedure Rules, it is the responsibility of the Mayor as the executive to prepare a draft plan for full council to consider and adopt. It is also the responsibility of the executive and officers to implement the plan once approved by full council.

- 5.7 When taking decisions, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who don't. Equalities considerations are set out in the One Tower Hamlets Section of the report and there is an Equalities Considerations at appendix 2 and an Equalities Analysis – Initial Screening Document at appendix 3.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 The Community Safety Partnership (Safe and Cohesion Community Plan Delivery Group) aims through its plan, to make Tower Hamlets a more cohesive place to live, work, study and visit. The work of the No Place For Hate Forum; Tension Monitoring Group and the Prevent Board, all subgroups of the CSP aim to carry-out this important part of work for the Partnership. Prevent, Hate Crime and Cohesion remain an important priority for the Partnership.
- 6.2 An initial Equalities Screening and full Equalities Analysis was produced as part of the original CSP Plan 2013-16 Report, which went through the Full Council approval process, culminating at Full Council on 26th March 2014. Recommendations were made for further considerations when supporting action plans are developed.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 Whilst difficult to quantify there are potentially significant efficiency gains from working in partnership to reduce crime and disorder in the borough. The Community Safety Plan 2013-16 is a partnership document and brings together key crime and disorder reduction agencies, will ensure that we continue to work together as a partnership and share resources.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 The Community Safety Plan 2013-16 and its implementation is expected to have a positive effect on the environment by helping to reduce anti-social behaviour. This will then reduce the amount of criminal damage, graffiti, fly-tipping and fly-posting and other environmental crimes in the borough.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 The Community Safety Plan sets out an overarching structure and framework of priorities within which management of risks will take place.
- 9.2 The Community Safety Partnership Subgroups identify and report on emerging threats and risks to partnership activity against its priorities in their Quarterly Performance Reports which are then reviewed by the Partnership at their Quarterly CSP Meetings. From September 2016 the CSP will be extracting those threats and risks and including them in a CSP Risk Register along with mitigating actions proposed by the partners.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 The reviewed Community Safety Partnership Plan 2013-16 for 2016/17 will ensure that we continue to work in partnership to reduce crime, anti-social behaviour, substance misuse and re-offending. It will also support the Mayors priorities helping to reduce fear of crime and contributing to relevant 'safer' related community plan commitments.

11. SAFEGUARDING IMPLICATIONS

- 11.1 The Community Safety Partnership includes amongst its members the independent chairs of both the Safeguarding Adults and Safeguarding Children Boards. These boards are seen as 'linked boards' to the CSP and have been included in the development process of the reviewed CSP Plan. There are no safeguarding risks identified from the Plan, only benefits for partner agencies across the CSP and both Safeguarding Boards by working together at strategic and operational levels in the borough, to ensure community safety in all its forms.

Linked Reports, Appendices and Background Documents

Linked Report

None

Appendices

Appendix 1 – Tower Hamlets Community Safety Partnership Plan 2013-16 Year 4 (2016/17)

Appendix 2 – Equalities Considerations

Appendix 3 - Equalities Analysis – Initial Screening Document

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

None

Officer contact details for documents:

Colin Hewitt, CSP Officer, Communities Localities and Culture, 0207 364 6134

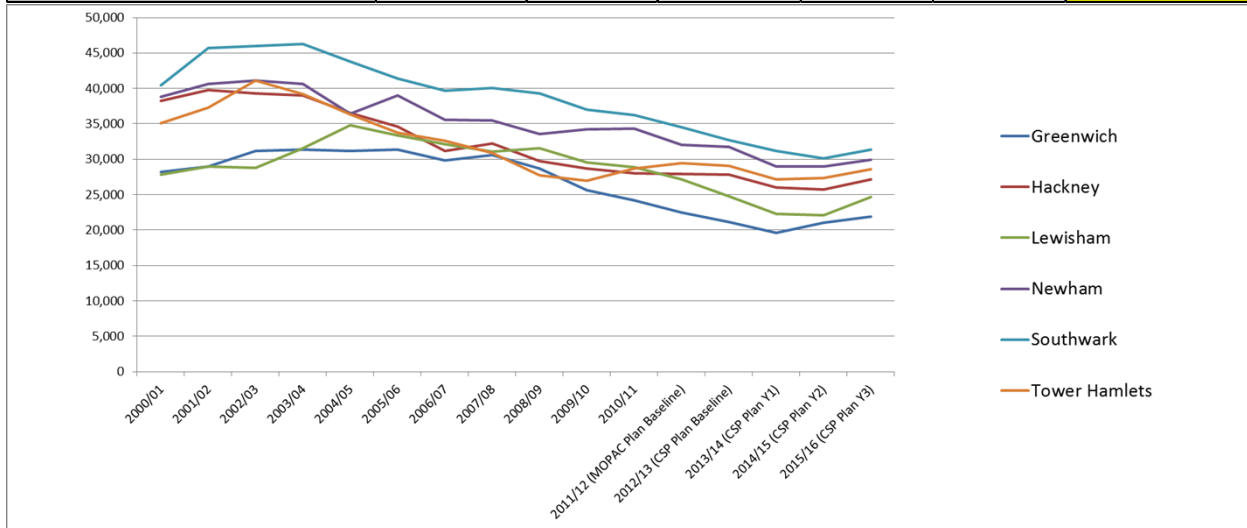
**Tower Hamlets
Community Safety Partnership Plan
2013 – 2016
Year 4 (2016/17)**

Approved by CSP (18.07.16)

Total Crime in Tower Hamlets and Neighbouring Boroughs

Annual Total Notifiable Offences (TNOs) recorded by the Metropolitan Police in Tower Hamlets and neighbouring boroughs over the 16 financial years (2000/01 – 2015/16). Total Notifiable Offences (TNOs) is a count of all offences which are statutorily notifiable by the Police to the Home Office, and for the purposes of this Plan what the Community Safety Partnership refers to as 'Total Crime'.

Financial Year	Total Notifiable Offences					
	Greenwich	Hackney	Lewisham	Newham	Southwark	Tower Hamlets
2000/01	28165	38242	27814	38776	40447	35070
2001/02	28995	39769	29008	40616	45707	37273
2002/03	31202	39267	28763	41157	45960	41124
2003/04	31347	39035	31577	40615	46276	39188
2004/05	31186	36492	34833	36460	43771	36329
2005/06	31354	34630	33387	39020	41432	33756
2006/07	29829	31160	32150	35597	39713	32627
2007/08	30617	32241	31055	35448	40029	30892
2008/09	28690	29715	31549	33536	39271	27712
2009/10	25631	28722	29544	34240	37037	26989
2010/11	24148	28035	28888	34374	36273	28668
2011/12 (MOPAC Plan Baseline)	22434	27902	27168	32011	34483	29463
2012/13 (CSP Plan Baseline)	21110	27804	24727	31716	32747	29082
2013/14 (CSP Plan Y1)	19630	26031	22327	28950	31195	27139
2014/15 (CSP Plan Y2)	21020	25705	22106	28982	30119	27345
2015/16 (CSP Plan Y3)	21887	27127	24628	29964	31335	28618



Total Notifiable Offences (TNOs) Comparison						
	Greenwich	Hackney	Lewisham	Newham	Southwark	Tower Hamlets
Year 1 of CSP Plan against CSP Plan baseline 2013/14 vs 2012/13 (Percentage)	↓ 1475 (-6.9%)	↓ 1708 (-6.1%)	↓ 2346 (-9.5%)	↓ 2735 (-8.6%)	↓ 1436 (-4.4%)	↓ 1908 (-6.5%)
Year 2 of CSP Plan against CSP Plan baseline 2014/15 vs 2012/13 Percentage	↓ 1938 (-9.2%)	↓ 4433 (-15.9%)	↓ 4612 (-18.7%)	↓ 5438 (-17.1%)	↓ 5099 (-15.6%)	↓ 4178 (-14.2%)
Year 2 of CSP Plan against Year 1 2014/15 vs 2013/14 Percentage	↓ 463 (-2.4%)	↓ 2725 (-10.5%)	↓ 2266 (-10.2%)	↓ 2703 (-9.3%)	↓ 3663 (-11.7%)	↓ 2270 (-8.4%)
Year 3 of CSP Plan against CSP Plan baseline 2015/16 vs 2012/13 Percentage	↑ 777 (+3.7%)	↓ 677 (-2.4%)	↓ 99 (-0.4%)	↓ 1,752 (-5.5%)	↓ 1,412 (-4.3%)	↓ 464 (-1.6%)
Year 3 of CSP Plan against Year 2 2015/16 vs 2014/15 Percentage	↑ 867 (+4.1%)	↑ 1,422 (+5.5%)	↑ 2,522 (+11.4%)	↑ 982 (+3.4%)	↑ 1,216 (+4.0%)	↑ 1,273 (+4.7%)
Year 3 of CSP Plan against Met Police recording baseline 2015/16 - 2000/01 (Percentage)	↓ 6,278 (-22.3%)	↓ 11,115 (-29.1%)	↓ 3,186 (-11.5%)	↓ 8,812 (-22.7%)	↓ 9,112 (-22.5%)	↓ 6,452 (-18.4%)

Figures obtained from the Metropolitan Police Service Crime Mapping: Data Tables section of MPS website on 10.05.16

Foreword by Co-Chairs of Community Safety Partnership

Welcome to Tower Hamlet's Community Safety Plan covering the four years 2013/14 to 2016/17.

The Community Safety Partnership Plan sets out how the Police, Council, Probation, Health, Fire Service, voluntary and community sectors and individuals can all contribute to reducing crime, disorder, anti-social behaviour, substance misuse and re-offending to keep Tower Hamlets a safe place.

This Plan aims to reduce the number of crimes and anti-social behaviour in the borough, but in some categories, it aims to increase the number of reports, due to under reporting where historically victims don't feel confident enough to report it to us. By increasing reporting and therefore recording, we will then be able to offer support to those victims and take appropriate action against the perpetrators.

The people in our communities are not just numbers or statistics, crime and disorder impacts on not only the victim's but also the wider community's quality of life, so we understand how important it is for you that we tackle it in a timely, efficient and effective way.

We are confident that this Plan not only captures and addresses the priorities that have been identified through our analysis of evidential information and performance in the borough, but also the concerns of the people of Tower Hamlets.

We recognise that not only do we have a duty to continue to tackle crime and disorder but we all (both organisations and members of the public), have a duty to prevent it from happening in the first place.

As a partnership we are responsible for community safety and community cohesion. We will work with our local communities to ensure we protect the vulnerable, support our communities to develop and make Tower Hamlets a safer place for everyone.



Cllr Shiria Khatun (Co-Chair of CSP)
Cabinet Member for Community Safety



Detective Chief Superintendent Sue Williams (Co-Chair of CSP)
Metropolitan Police Borough Commander (Tower Hamlets)

Contents

Introduction	5
About the Partnership	6
Governance	7
Governance Structure	10
CSP and Sub-groups	11
Highlights and Performance from 2015/2016	16
Strategic Assessment 2015	27
Performance	29
Public Consultation	37
Decision on Priorities	38
Priorities for 2013 – 16:	39
Priority A – Gangs and Serious Youth Violence	40
Priority B – Anti-Social Behaviour and Arson	45
Priority C – Drugs and Alcohol	47
Priority D – Violence (including Domestic Violence and Violence Against Women and Girls)	50
Priority E – Prostitution	56
Priority F – Hate Crime and Cohesion	58
Priority G – Killed or Seriously Injured	63
Priority H – Prevent	65
Cross-Cutting Priorities:	67
Cross-cutting Priority 1 – Public Confidence & Victim Satisfaction	68
Cross-cutting Priority 2 – Reducing Re-offending	70
Cross-cutting Priority 3 – MOPAC 7	73

Introduction

The Tower Hamlets Community Safety Partnership (CSP) is required by law to conduct an annual assessment of crime, disorder, anti-social behaviour, substance misuse and re-offending within the borough, this is known as the Strategic Assessment. It is also required to consult members of the public and the wider partnership on the levels of the above. The Strategic Assessment and the findings of the public consultation are then used to produce the partnership's Community Safety Plan.

Since 2011, the CSP has had the power to decide the term of its Community Safety Plan. In 2012, the CSP chose to have a one year plan, this decision was based on the unique budgetary pressures on partner agencies and the anticipated demand on service from London hosting the 2012 Olympic and Paralympic games.

This Community Safety Plan will run for a period of 4 years from 1st April 2013 to 31st March 2017, with performance against the priorities within it reviewed on an annual basis in the form of the annual Strategic Assessment. The Community Safety Partnership Subgroups each produce an Action/Delivery Plan to reflect both the Priorities of the Community Safety Partnership and their own subgroup priorities. If due to external pressures or levels of performance against the priorities, the Community Safety Plan can be amended on an annual basis within its four year term. Performance against CSP Plan Priorities is reviewed in-year on a quarterly basis in the CSP Subgroup Quarterly Performance Reports submitted to the CSP.

Reducing crime and anti-social behaviour requires a careful balance between reducing recorded incidents, encouraging reporting and addressing negative perceptions of those who believe levels are worse than they are in reality.

This Plan will ensure that the issues most important to the people of Tower Hamlets will be addressed in the most appropriate and cost effective way. The partnership is committed to ensuring the low levels of particular crimes and issues are maintained, but have also identified through local evidence and perception, a number of priorities that require particular partnership focus in the four years of this Plan, which also sets out the main objectives of the CSP and how it plans to achieve those objectives.

The CSP has also chosen to align itself where possible with those of local and national governing bodies, which have a duty to oversee the work of not only the Partnership, but also key agencies referred to as 'Responsible Authorities' under the legislation. The Home Office and MOPAC play a significant role in both National and Local governance/direction as well as funding, which is the reason for this alignment.

The London Mayoral Elections are taking place on the 5th May 2016, once elected MOPAC will be producing a new London Police and Crime Plan for 2017 onwards, to reflect the priorities of the new Mayor's administrative term. 2016/17 financial year is being seen as a 'transitional year' by MOPAC in order to review the current priorities, align them with that of the new Mayoral Administration and then go out to public consultation. The CSP will be reviewing, producing and consulting on their new Community Safety Plan during this period.

About The Partnership

The Tower Hamlets Community Safety Partnership (CSP) is a multi-agency strategic group set up following the Crime and Disorder Act 1998. The CSP is also the delivery group responsible for partnership work in relation to the Tower Hamlets Community Plan priority 'A safe and cohesive community', with the priorities within both the Community Plan 2015 and this Community Safety Plan aligned. The partnership approach is built on the premise that no single agency can deal with, or be responsible for dealing with, complex community safety issues and that these issues can be addressed more effectively and efficiently through working in partnership. It does this by overseeing the following:

- Service Outcomes
- Leadership and Partnership Working
- Service Planning & Performance Management
- Resource Management & Value for Money
- Service Use and Community Engagement
- Equality & Diversity

The CSP is made up of both Statutory Agencies and Co-operating Bodies within the Borough. The Statutory Agencies are:

- Tower Hamlets Police
- London Borough of Tower Hamlets
- National Probation Service
- London Community Rehabilitation Company (CRC)
- London Fire Brigade
- NHS Bodies including: Bart's Health Trust, East London Foundation Trust and London Ambulance Service, as commissioned by Tower Hamlets Clinical Commissioning Group (CCG)

The Mayor's Office for Policing and Crime (MOPAC), replaced the Metropolitan Police Authority in February 2012, is no longer a statutory agency of the CSP, but becomes a co-operating body. Representatives from MOPAC and the Tower Hamlets Police and Community Safety Board are both members of the CSP, although MOPAC are not required to attend meetings unless they wish to or requested to present.

The above statutory agencies and co-operating bodies are supported by the following key local agencies from both the Public and Voluntary Sectors.

- Housing Providers
- Victim Support
- Tower Hamlets Council for Voluntary Services
- Tower Hamlets Inter Faith Forum
- Tower Hamlets Council of Mosques
- Tower Hamlets Safer Neighbourhood Board
- Canary Wharf Group

Housing Associations and Housing Providers have a key role to play in addressing crime and disorder in their housing estates and these are represented by the Chair of the Tower Hamlets Housing Forum's ASB Strategy Group. Victims and witnesses of crime and disorder are represented on the CSP by Victim Support. Faith organisations are represented by the independent chair of the borough's Interfaith Forum and a senior figure from the borough's Council of Mosques. The extensive network of voluntary organisations within the borough, are represented by Tower Hamlets Council for Voluntary Services' Chief Executive.

Representation on the CSP is through attendance by senior officer / person within that organisation with the authority to make strategic decisions on behalf of their agency/organisation.

Partners bring different skills and responsibilities to the CSP. Some agencies are responsible for crime prevention while others are responsible for intervention or enforcement. Some have a responsibility to support the victim and others have a responsibility to work with the perpetrator. Ultimately the CSP has a duty to make Tower Hamlets a safer place for everyone.

Governance

The Community Safety Partnership is one of 4 Community Plan Delivery Groups which are held responsible by the Partnership Executive for delivering the aims/actions contained within the Community Plan.

Partnership Executive

The Partnership Executive is the borough's Local Strategic Partnership and brings key stakeholders together to create and deliver the borough's Community Plan. Members of the Partnership include the Council, Police, NHS, other statutory service providers, voluntary and community groups, faith communities, housing associations, businesses and citizens. It acts as the governing body for the Partnership, agreeing priorities and monitoring performance against the Community Plan targets and holding the Partnership to account through active involvement of local residents. The Community Plan is an agreement that articulates the aspirations of local communities and sets out how the Borough will work together to realise these priorities.

Community Plan

The overall vision for the community plan is to improve the lives of all those living and working in the borough. The Community Plan includes 4 main priorities of which 'A Safe and Cohesive Community' and Tower Hamlets will be a safer place where people feel safer, get on better together and difference is not seen as threat but a core strength of the borough. To make Tower Hamlets a Safe and Cohesive Community the Partnership will focus on the following commitments:

- Reduce acquisitive crime and anti-social behaviour by tackling problem drinking and drug use
- Limit local gangs and the impact they have on youth violence and fear of crime
- Strengthen partnership work to reduce domestic violence and violence against women and girls
- Promote community cohesion
- Find solutions to increase cycling safety on busy roads

Mayor's Office for Policing and Crime (MOPAC)

The Mayor's Office for Policing and Crime (MOPAC) was created by the Police Reform and Social Responsibility Act 2011. Its core function is to secure the maintenance of an efficient and effective Metropolitan Police Service (MPS), and to hold the Commissioner of Police to account for the exercise of his functions in London. MOPAC oversees the police and criminal justice system performance, the budget environment, and the implementation of policies set out in MOPAC's Police and Crime Plan.

The Mayor of London's Office for Policing and Crime, under the remit of being London's Police and Crime Commissioner, has several responsibilities regarding Community Safety Partnerships. They are:

- a duty to consult the communities (including victims) and to publish a Police and Crime Plan
- determining police and crime objectives
- are a co-operating body on Community Safety Partnerships
- have the power to 'call in' poor performing Community Safety Partnerships.

The London Mayoral Elections have taken place on the 5th May 2016, following the election MOPAC will be producing a new London Police and Crime Plan for 2017 onwards, to reflect the priorities of the new Mayor's administrative term. 2016/17 financial year is being seen as a 'transitional year' by MOPAC in order to review the current priorities, align them with that of the new administration and then go out to public consultation. The priorities within MOPAC's Police and Crime Plan 2013-16, their current Plan (at the time of writing) for this 'transitional year' are:

- Strengthen the Metropolitan Police Service and drive a renewed focus on street policing
- Give victims a greater voice
- Create a safer London for women
- Develop smarter solutions to alcohol and drug crime
- Help London's vulnerable young people

In addition to the above, the Mayor of London has placed special emphasis on a number of additional public safety challenges and concerns of Londoners, which include:

- Violence Against Women and Girls

- Serious Youth Violence
- Business Crime

MOPAC is also responsible for the management and allocation of the Community Safety Fund monies from Central Government. Allocations for funding will be made on a 'Challenge Fund' approach, which will determine the nature and scale of funding to individual boroughs based on their proposal's alignment with the Police and Crime Plan Priorities.

Linked Strategies and Delivery Plans

The Community Safety Partnership Plan does not exist in isolation: Rather, it is part of a series of key strategies in the borough which set out how local services will support and improve the lives of local residents. Sitting above this collection of strategic plans is the over-arching 2015 Tower Hamlets Community Plan.

The Community Plan is based around four key themes:

- A great place to live
- A fair and prosperous community
- A safe and cohesive community
- A healthy and supportive community

In addition, the Community Plan contains four cross-cutting priorities:

- Empowering residents and building resilience
- Promoting healthier lives
- Increasing employment
- Responding to population growth

This Community Safety Partnership Plan 2013-16, the strategic aims and the activity against these aims are linked to other Community Plan Delivery Groups' strategies and their subgroup delivery plans, which all aim to improve the lives of people in Tower Hamlets.

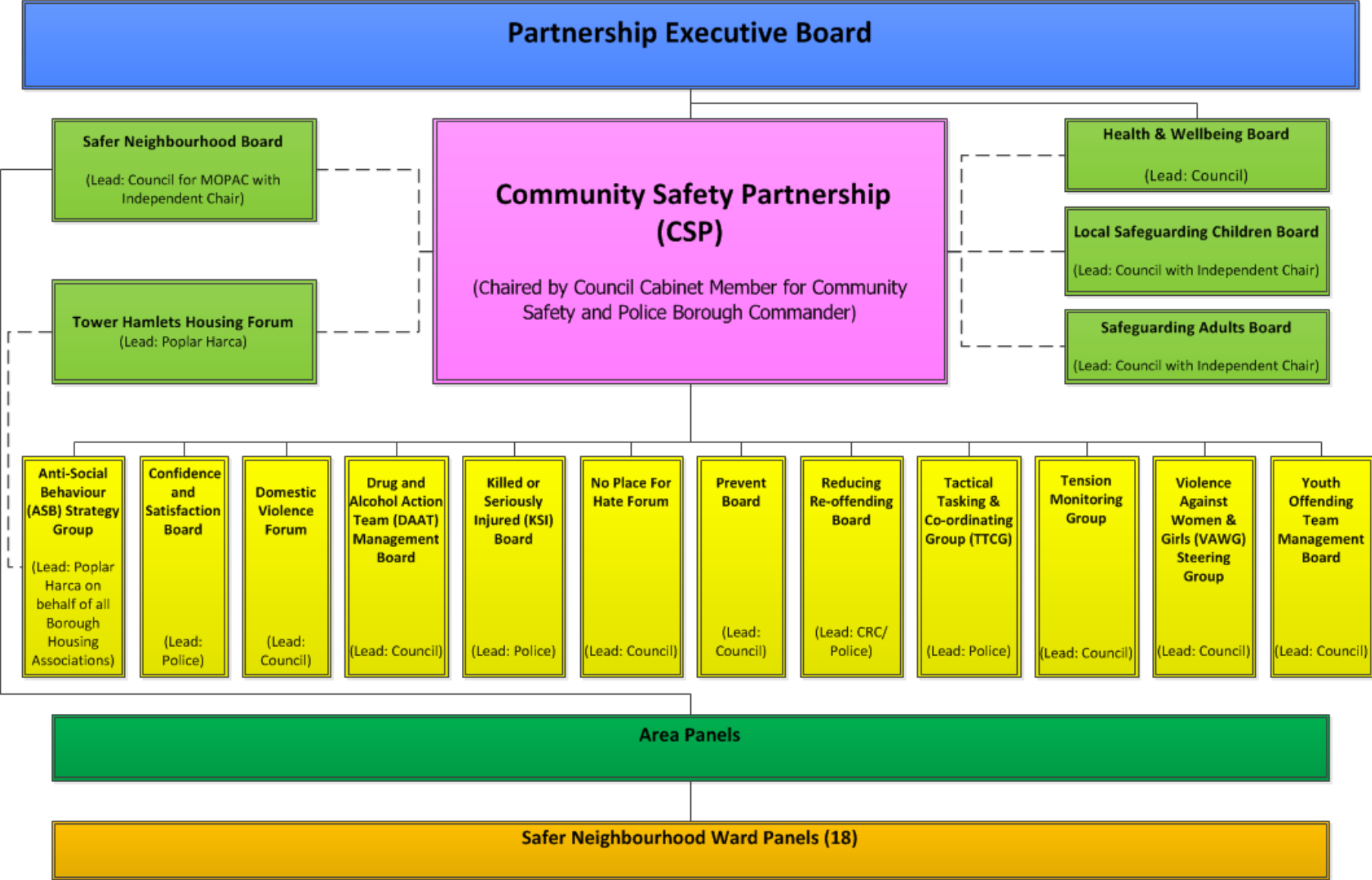
Community Safety Partnership Sub-Groups

In order to co-ordinate and deliver activity in the various areas of crime, disorder, anti-social behaviour, substance misuse and reducing re-offending, the CSP has a sub-structure of groups and boards. Each sub-group/board is responsible for producing a delivery plan which aims to address the overarching partnership priorities and fulfil any additional priorities they see fit as a sub-group/board. They are responsible for ensuring there are resources available to deliver their actions and if needed, produce and submit detailed funding applications to enable this.

Subgroups are represented through their Chairperson on the Community Safety Partnership, who is required to provide a bi-monthly update on performance against their delivery plan.

Subgroups are made up of senior officers within key agencies, who have a direct responsibility for service delivery in these specific areas of work.

Tower Hamlets Community Safety Partnership Governance 2016



Community Safety Partnership, Subgroups and Linked Boards

Community Safety Partnership

The CSP as it is known amongst the partners is accountable for the reduction of crime, disorder, anti-social behaviour, substance misuse and reoffending, as well as increasing community cohesion under the Community Plan Partnership Structure. It will determine priorities and oversee the statutory and non-statutory boards responsible to deliver against these priorities. The CSP meets on a quarterly basis and is co-chaired by the Tower Hamlets Police Borough Commander and the Tower Hamlets Cabinet Member for Community Safety. Membership of the CSP is at organisational Chief Executive/Officer level.

Anti-Social Behaviour (ASB) Strategy Group

The Tower Hamlets Housing Forum ASB Strategy Group is chaired by Poplar HARCA's Director of Housing on behalf of all housing providers in the borough. It is responsible to both the Tower Hamlets Housing Forum and the Community Safety Partnership since merging with the CSP ASB Strategy Group in January 2016. Registered Social Landlord ASB Forum merged with the CSP ASB Strategy Group in January 2016. The Strategy Group is made up of partner agencies with a strategic responsibility to address anti-social behaviour including arson (deliberate fire setting) in the borough, and includes representation from the Police, Council, Victim Support, London Fire Brigade, Youth Offending Service, Probation and the following ASB Partnership Boards/Groups: ASB Operations Group, ASB Partnership Action Group, ASB Legal Consultation and Certification Group, Neighbourhood Panels and Community Trigger Panel. Like all CSP Subgroups, the ASB Strategy Group is responsible for producing an annual action/delivery plan which aims to address the priorities identified in the Community Safety Partnership Plan.

Confidence & Satisfaction Board

The confidence and satisfaction of the community in our shared approach to crime and cohesion are key success measures. The Confidence and Satisfaction Board is chaired by the Police Superintendent, with representatives from the Council, Victim Support and Safer Neighbourhood Board. It has an overview of activity to ensure that community views and concerns are understood and addressed both efficiently and effectively. It also ensures that residents have access to relevant information, including feedback on action taken.

Domestic Violence Forum

The Domestic Violence Forum is chaired by the LBTH Head of Community Safety and oversees the borough's multi-agency approach to addressing domestic violence and abuse against men, women and young people. Membership comprises approximately 100 organisations

representing both statutory and voluntary service providers in the borough. The forum takes place quarterly and has oversight of key domestic violence activities including the Multi-Agency Risk Assessment Conference (MARAC), the Specialist Domestic Violence Court (SDVC), the DV One Stop Shop, the Housing & Health DV drop-in services, the LBTH Domestic Violence Duty Line, training and safeguarding matters related to domestic abuse. The Forum is ultimately responsible for coordinating services within the borough for both domestic violence victims and those perpetrating violence against them. The DV Forum ensures an annual action plan is in place which is reviewed at each forum meeting as well as key activities and outcomes are reported back at CSP Board.

Drug and Alcohol Action Team Management Board

This board is chaired by the LBTH Corporate Director of Communities, Localities and Culture, with membership representing the CLC DAAT, Public Health, Education, Social Care and Wellbeing, health services, the Metropolitan Police Service, National Probation Service and London Community Rehabilitation Company. It is a statutory board with responsibilities for developing and implementing local strategy to combat the harms associated with drug and alcohol use. This includes co-ordinating and commissioning services relating to drug / alcohol issues in the borough including; drug / alcohol treatment for adults and young people, prevention and behaviour change, licensing and regulation / enforcement.

No Place for Hate Forum

The forum brings key agencies together to work in partnership to develop and promote a co-ordinated response to hate crime in Tower Hamlets. It aims to protect and support victims, deter perpetrators, and challenge prejudice and hate. The Forum meets on a quarterly basis, and is chaired by the Chair of the borough's Interfaith Forum, with members from both statutory and voluntary organisations, including those representing specific areas or communities concerning hate crime.

Prevent Board

This board is chaired by the Council's Chief Executive. It operates as a distinct board with responsibility for delivering the local Prevent programme. The board is made up of officers from One Tower Hamlets, Youth Services, Tower Hamlets Police, NHS Tower Hamlets, Home Office SO15, Probation, London Fire Brigade, Tower Hamlets Clinical Commissioning Group, the Council's Adult Services, Children's Services, Youth Services, Communications, Public Health, Safer Communities Service, along with both Independent Chairs of the Safeguarding Adults Board and the Safeguarding Children Board. It meets bi monthly and has a Prevent Delivery Plan which informs strategic and lead partner activities. Updates are provided at each CSP Board.

Prostitution Board/Governance

With Prostitution now being a Priority for the CSP, consideration by the CSP is being undertaken to reflect which Board is responsible for Prostitution Priority to the CSP. Currently it is the responsibility of both the Violence Against Women and Girls (VAWG) Steering Group in relation to the sex workers involved and the Anti-Social Behaviour (ASB) Strategy Group with regards its anti-social behaviour impacts.

Reducing Re-offending Board

This Board oversees the delivery of the borough's Integrated Offender Management initiative, the Gangs programme and the local MAPPAs; it is also responsible for other programmes such as Gripping the Offender (a MOPAC pilot). The board is co-chaired by a Detective Superintendent from the local police and the Community Rehabilitation Company's Assistant Chief Officer. Where necessary the Board will seek to commission housing and/or other services.

Safeguarding Adults Board (Linked Board)

The Safeguarding Adults Board is a statutory local partnership board in its own right under the Care Act 2014, with shared interests and a close relationship with the CSP. The multi-agency board comprises of lead people from all the NHS organisations in the borough, various Council services, Police, Probation, Fire, Ambulance, Housing providers and voluntary, community and advocacy organisations. The Safeguarding Adults Board has a similar close working relationship with the Health and Wellbeing Board and the Local Safeguarding Children Board, as with the Community Safety Partnership Board. It has an Independent Chair not employed by any of the member organisations. The board oversees and seeks assurances about the quality of service responses to people who are vulnerable and in need, or potentially in need, of safeguarding. It also supports and scrutinises the quality of partnership working between organisations in line with statutory and Pan-London requirements.

Local Safeguarding Children Board (Linked Board)

This is a statutory multi-agency Partnership Board under The Children Act 2004, which has an Independent chair and comprises of lead officers from various Council services, Police, National Probation Services and London Community Rehabilitation Company, Clinical Commissioning Group, NHS Trusts, CAFCASS and the local voluntary sector. It also includes two lay members.

The LSCB's objectives are to co-ordinate what is done by each person or body represented on the Board for the purposes of safeguarding and promoting the welfare of children in the borough; and to ensure the effectiveness of what is done by each person or body for those purposes. The LSCB works in partnership with the CSP to ensure that in delivering its agenda the CSP ensures that the safeguarding of children and young people remains paramount. The Independent Chair of the LSCB also has a seat on the Health and Wellbeing Board.

Children and Families Partnership Board (Linked Board)

The Children and Families Partnership Board has membership from a wide range of local organisations, and functions as one of the key strategic groups within the borough. The Board is chaired by the Deputy Mayor and Cabinet Member for Education and Children's Services. This partnership is made up a range of local agencies and other representatives, including: Bart's Health NHS Trust, East London NHS Foundation Trust, GPs, Tower Hamlets Clinical Commissioning Group, London Borough of Tower Hamlets, Metropolitan Police, Registered Housing Providers, Schools, Tower Hamlets College, third and voluntary sectors.

The Children and Families Partnership Board have recently produced the 2016 - 19 Children and Families Plan, which sets out how the partnership will support children and families in Tower Hamlets over the next three years. The Plan has been developed in close consultation with staff and stakeholders, as well as with children and families themselves. Their Plan is a partnership document. Different organisations will continue to have their own plans setting out how their core responsibilities will be met, however this Children and Families Plan states our collective vision for children and families in the borough. The Plan brings together priorities that require input from a range of services and organisations, as well as from children and families themselves.

Tactical Tasking and Co-ordinating Group (TTCG)

The Group was established as part of the programme to join together partnership service delivery in the localities. It meets on a fortnightly basis and uses an analytical product/profile on current/emerging crime and anti-social behaviour issues to task police resources to respond. The overarching principle behind the Group is to ensure that local operational activity is prioritised against MPS Control Strategy priorities, which also include community concerns as determined through ward panels.

The group is chaired by the Police Borough Commander and the membership includes various ranking police officers. The London Fire Brigade and Tower Hamlets Homes are represented on group in addition to senior Council officers.

Tension Monitoring Group (TMG)

This group is chaired by the Service Head of Safer Communities and acts as an operational group to monitor and respond to emerging community tensions. The group is made up of representatives from organisations including the Interfaith Forum, the London Muslim Centre, the Council of Mosques, Rainbow Hamlets, Youth Services, Tower Hamlets Police, the Council's Safer Communities Service, Corporate Safety and Civil Protection, Communications and One Tower Hamlets. The TMG group meet on a quarterly basis but can also convene a meeting at any time if required based on any incident that has occurred that poses a risk to community cohesion.

Violence Against Women and Girls (VAWG) Steering Group

The VAWG Steering Group is chaired by the Head of Community Safety and oversees the borough's multi-agency approach to addressing all forms of Violence Against Women and Girls. Whilst it has an oversight of domestic violence and Child Sexual Exploitation (CSE), the detail of these are dealt with separately via the Domestic Violence Forum and LSCB CSE subgroup respectively. The other main types of violence covered include rape and sexual violence, trafficking, prostitution, female genital mutilation, forced marriage, so called 'honour' based violence, stalking and harassment and dowry related abuse. These are the Borough's strands within its Violence against Women and Girls Plan.

Membership comprises approximately a dozen individuals with responsibility for statutory services in the borough. The forum takes place quarterly and has oversight of key initiatives in this area including the Tower Hamlets Prostitution Partnership (Prostitution Multi-Agency Risk Assessment Conference (MARAC)), the Prostitution Support Programme, and the VAWG Training and Awareness Officer. The Forum is ultimately responsible for coordination of services within the borough for both violence victims/survivors and those perpetrating violence against them.

Youth Offending Team (YOT) Management Board

The YOT Management Board is chaired by the Corporate Director of Children's Services and oversees the youth offending multi-agency team which comprises of staff from: the Council Children's Services, Youth Service, Police, Probation and Health. The Youth Offending Team works with young people from arrest, through sentencing and either when in custody or during a community sentence. The team also support young offenders post custody. Staff provide services including bail and remand management and Pre-Sentence reports to the Youth, Magistrates and Crown Courts and work with young people subject to reprimands and final warnings from Police, and those charged, convicted and given community and custodial sentences. The team also works with young people and the wider community to prevent young people entering the Criminal Justice System.

Tower Hamlets Safer Neighbourhood Board

The Board gives local people and victims of crime a greater voice in setting policing priorities in Tower Hamlets. Safer Neighbourhood Boards operate in every London borough and are the means by which the Mayor of London (through the Deputy Mayor and the Mayor's Office for Policing and Crime) holds Borough Police Command Units to account for performance. The Board has an independent Chair, who along with executive board members recruited from the local community provide independent scrutiny, challenge, and strategic vision to ensure that the police collaborate and work together with other agencies successfully to co-ordinate and promote the policing and crime reduction agenda.

Highlights and Performance from 2015/16

Domestic Violence:

The Sanctuary Project has been secured and continued for 2016/17 with the contract awarded to Safe Partnerships following a competitive tendering process. The Project enables the Partnership to annually support up to 60 victims of domestic violence by target hardening their homes.

Following an in-depth review, the Specialist Domestic Violence Court funding has been confirmed from London Borough of Hackney to continue to part-fund the SDVC Co-ordinator post. This ensures the valued service is continued to be provided to victims of domestic violence at our local courts, which is also responsible for increased victim satisfaction for domestic violence cases heard at the SDVC and also to decrease unsuccessful prosecutions of these domestic violence cases

Multi-Agency Risk Assessment Case-conferences (MARACs) continue to be held bi-monthly ensuring high risk cases are reviewed in partnership and appropriate agencies are providing the right level of support to these vulnerable victims of domestic abuse. Safe Lives (formerly known as CAADA) highlighted Tower Hamlets as a 'good practice borough' following their inspection and their recommendations for building on this has been formulated into a partnership action plan which has now been delivered.

The Domestic Violence One Stop Shop has seen an increase in domestic violence reports and continues to grow from strength to strength having encouraged hundreds of victims to report to disclose domestic abuse.

Domestic Violence Training has been provided to hundreds of community and professionals within the borough enabling them to have increased awareness of domestic violence services available and to consequently safeguard victims and their families.

Funding has been secured to undertake work with DV victims with multiple disadvantages which include ensuring holistic wrap around support for women with no recourse to public funds, training for professionals and legal advice around immigration issues.

Violence against Women and Girls (VAWG), Domestic Violence and Prostitution:

Over a thousand professionals, residents and young people have received training in VAWG through our VAWG Training and Awareness Officer and schools programmes, further raising awareness of this in the borough. This had led to an increase in reporting across the priority performance indicators, except for Female Genital Mutilation (FGM), however an FGM partnership conference should raise awareness of the referral pathways and lead to both increased awareness and possible reporting.

The new Violence Against Women and Girls Strategy 2016-19 has been produced following extensive consultation across partner agencies and stakeholders. The Strategy has entered into the Formal Council Approval Process and is anticipated to be ratified by autumn 2016.

Over the last 3 years, almost a £1,000,000 funding has been raised from external sources including MOPAC, DfE and DCLG. This includes being one of five boroughs to participate in a MOPAC and DfE funded pilot to tackle harmful practices.

Further development of the 'whole school' approach to prevention developed and implemented in schools across the borough.

Recruitment of 43 VAWG Champions from organisations across the borough

1148 young people have received awareness raising sessions, including 994 professionals trained, 318 of which have been school staff and over 450 community members including parents.

There has been an increased awareness regarding the risk of exploitation and extremism and a workshop has been delivered and will continue to be supported to schools and be promoted wider.

A number of campaigns this year have also supported the whole school approach and looking at intervention approaches. For example a successful training session with youths took place understanding healthy relationships and identity.

The SDVC has seen a steady decrease in unsuccessful prosecutions. In total unsuccessful prosecutions have decreased by 10% and the number of cases being prosecuting has also steadily increased with 158 extra cases being prosecuted in 2015/16.

Victim satisfaction at SDVC has increased by 37% to 87%.

The last 12 months has seen a significant different approach by the SDVC and its partner agencies in how they deal with DV cases. In particular the implementation of a policy where special measures will be applied for at the 1st hearing irrespective of whether these have been requested by the victim. This has seen a reduction in the need for extra hearings being listed and the police needing to complete further statements. It has also allowed the SDVC Coordinator and the IDVAs to encourage victims to attend court without the anxiety of having to see the perpetrator whilst giving evidence. The SDVC Coordinator has also worked with the court and other agencies in implementing a remote video link facility. This means that we are now able to apply to the court to allow a victim to give their evidence remotely and the need for them to attend court is removed.

Increase in MARAC referrals and exceeded targets set by Safe Lives.

Continuation funding for Sanctuary Project and installations provided for high risk victims of domestic violence, and a significant increase in Sanctuary referrals.

Increase in DV reports via DV One Stop Shop including positive feedback received.

Community Groups Programme to 18 mothers affected by DV via the Positive Change Programme.

Increased funding to tackle FGM included being one of the first boroughs to pilot the Harmful Practices Project which include Community Advocates raising awareness and training.

Recruitment of over 150 VAWG Champions from organisations across the borough.

Extensive consultation and development of a new VAWG Strategy 2016-2019.

VAWG Network of over 500 participants. Over 1000 young people have received lessons on VAWG awareness and over 1500 professionals have received training

Whole school approach to prevention developed and implemented in schools across the borough. Training delivered in regards to exploitation and radicalisation.

Funding received to deliver a project to support the accommodation needs for women with no recall to public funds who are victims of Domestic abuse.

Increase in referrals to TH Prostitution MARAC resulting in increased support for victims of sexual violence and domestic abuse.

Increase in support for sex workers who have had their children removed via Hummingbirds Project within CSC.

Drugs and Alcohol:

A new Substance Misuse Strategy 2016-19 has been produced to continue the work of the previous Substance Misuse Strategy and will be signed off by key partners across the borough.

Procurement of a redesigned adult drug / alcohol treatment system commenced and recommendations made for the award of new contracts to facilitate improved access to and better outcomes from treatment.

A Therapeutic Recovery Champion plan has been agreed for every treatment service as well as some hostels to make recovery more visible to all and improve treatment outcomes for service users.

During 2015/16, there have been sustained improvements in performance of the drug treatment system with successful completions for both opiate users and non-opiate users continuing to show improvements over the first half of the year. This sustained improvement means that Tower Hamlets is no longer considered to be a 'priority partnership' in relation to treatment outcomes for drug users.

A working group was established by the DAAT to improve alcohol performance relating to the number of alcohol users engaged in structured treatment. Treatment outcomes (successful completions) for alcohol clients have improved from around 20% in February 2015 up to 30% as of January 2016. This work has now been recognised by Public Health England as an example of best practice.

Anti-Social Behaviour:

ASB Demand (calls to police to report ASB via 101 or 999) has reduced by 9.1% over the financial year 2015/16 when compared to the previous year.

The partners have continued to develop the ASB Partnership Action Group for vulnerable and at risk victims of ASB over the past 12 months, close working with Mental Health support services has increased support to this group and has made a significant contribution to the reduction of repeat callers. This has resulted in a 9.1% reduction in repeat callers, with one person alone responsible for 700 calls a year accessing mental health support and no longer calling the Police at all. To date 25 cases in total have been discharged.

Partnership training has been provided on new ASB legislation, which has eased the transition from the old powers and enabled new powers to be used effectively and consistently in the borough.

Close working by statutory and other partners with hostels and housing providers led to more effective and appropriate support being offered and taken by a particularly vulnerable client group that causes ASB that often significantly impacts on neighbours living nearby.

Gangs and Serious Youth Violence:

The Youth Offending Service is now managed alongside the Family Intervention Service, which allows for closer working across both services. YOS Operational Managers are implementing a more reflective approach to supervision, which has been well received. The Groups, Gangs and Serious Youth Violence Co-ordinator has been in post since Quarter 3 and this is leading to improved working to address this CSP Priority by all agencies responsible. The completion of the Thematic Review of older children who harm or have come to harm has been produced and findings from that are being taken into account for future service provision.

The Police have realigned resources to meet the specific profile of the borough; a police inspector now manages the Gangs Unit, Police YOT, youth/schools officers and the borough's police cadets. The inspector will work with partners to help prevent young people from becoming involved with gangs and/or crime.

Reducing Re-offending:

The Integrated Offender Management cohort has been re-focussed to ensure resources are targeted to support those prolific offenders who cause more serious offences such as burglary, robbery and violence. MAPPA subjects, domestic abuse suspects and gang nominals are managed separately. Visits to offenders within the cohort have increased to an average of 90 per month, with partnership agencies involved in these home visits. More mobile drug testing is taking place to ensure offenders are keeping free from the illegal substances that are often the cause of their offending.

The IOM team members have been trained in offender management work and referral pathways, with offenders being escorted to initial appointments Community Mental Health Teams, Drug Intervention Project and Probation. Working arrangements have been established with the DIP in targeting offenders to enable access to DIP resources including legal, medical and outreach.

Drug testing is being carried out by IOM Police Officers and intervention by IOM has prevented offenders being recalled/breached by Probation following re-engagement with services.

Public Confidence and Victim Satisfaction:

Both confidence and Satisfaction have improved over the last year, with Borough Police recently receiving an award from the Metropolitan Police Assistant Commissioner for the most improved public confidence, a 15% increase on previous confidence levels. As of February 2016, Victim Overall Satisfaction is 76%, whilst Confidence in Local Policing is at 66% as of Quarter 3 (December 2015).

Quality Call Backs (QCBs) by two police staff have been implemented and have gleaned first-hand feedback about primary and secondary investigations from victims. Increased staffing levels across all CID has led to a decreased workload and increased quality of service provided by secondary investigators. This has led to an increased level in satisfaction with CID handling of crime for violence, whilst burglary satisfaction has been maintained at 80%

The Independent Advisory Group (IAG) has been rejuvenated with 14 new members recruited and meetings held every two months to discuss incidents that have a wider impact on the community.

Hate Crime:

The Hate Crime Third Party Reporting Centres have been reviewed, re-trained and re-launched, to ensure they are providing a good standard of service to victims. Victim Support have 2 posts, whose remit specifically includes support for victims of hate crime and these posts are actively working on a number of hate crime cases, based in the borough. The No Place for Hate Campaign materials have been refreshed and continue to be publicised.

Presentations and training and awareness sessions have been provided for a number of organisations.

Further to the Paris and Brussels attacks, refugee crisis, war and politics, nationally there has been an increase in hate crime, in particular Islamophobia, but locally this has not been reflected other than the repeat return of Britain First protesting outside the East London Mosque. Anecdotal information suggests that Islamophobic crime is on the increase but it is low level and minimised by victims and so not reported.

Nationally LGBT hate crime has increased and this is seen as positive due to the increased resources around LGBT crime, including the work commissioned by ELOP around an LGBT Forum, Victim Support Specialist Worker, LGBT Police Liaison Officer and work done around International Day Against Homophobia (IDAHO).

Hate Crime Training has been successfully delivered to Tower Hamlets Homes Officers in Quarter 4, with over 300 people trained and engaged through outreach including training for parents on Strengthening Families Course and at the Early Years Conference with nursery providers.

Increase in referrals to Hate Incidents Panel including increased engagement and participation.

Higher visibility of No Place for Hate Campaign through increased training and outreach activities totalling 51 events across all key strands.

Increase in the number of people and organisations signed up to the No Place For Hate Pledge.

Tension Monitoring Group (TMG):

The TMG has strengthened its response to tackling and reducing tensions, successfully managing a number of high profile and potentially disruptive incidents.

The Group has been involved in reducing tensions that have come about from international issues but have had an impact locally, in particular the political issues in Syria.

Our success is evidenced through the boroughs annual residents' survey where the majority of residents (78%) feel that the local area is a place where people from different backgrounds get on well together. This is a positive result that has been maintained at this level for the past 8 years.

Along with the quarterly meetings, a number of meetings took place in 2015-16 both in a response to incidents that took place but also as to mitigate any issues arising due to a national incidents that had taken place, such as the Paris Terror attack in November 2015. The quarterly meeting also provide an opportunity to reflect on good practice and share partner messages in regards to community safety and cohesion projects scheduled locally.

Prevent Programme Board:

Following a workshop in December 2015 partners have reviewed and revised the Executive Prevent Board, agreeing terms of reference and key priorities fed back from both SO15 and the Home Office.

The Prevent Team have delivered training sessions across a range of stakeholders including CCG, DAAT, Rapid Response Youth Team, in schools, with parent governors and with bespoke Prevent Sessions delivered to Youth Service workers, In Quarter 4, 324 individuals have been trained. A Prevent Conference was held in March 2016 with a focus on safeguarding, Prevent Duty in Schools and also included sessions on Violence Against Women and Girls, Radicalisation and an update from Home Office funded projects.

Bids have been submitted to the Home Office to fund projects from their Best practice Catalogue along with a brief for additional funding for Prevent Staff, marketing and a conference for 2016/17.

Killed or Seriously Injured:

2015 saw a 22.7% decrease in the number of people killed or seriously injured KSIs on or around our roads compared to the previous year (based on provisional 2015 Transport for London (TFL) data). Anecdotally the decrease may be attributed to a number of road safety measures introduced by TFL and LBTH; the introduction of the 20mph limit and the Two Stage Right Hand Turn for Cyclists at Cycle Super Highways.

The KSI Board has been well established since 2015 with buy-in from LBTH, TFL, RTPC and LFEPA, meeting on a bi-monthly basis. LBTH Road Safety Engineering department secured funding for a speed gun and certification for eight borough officers and two RTPC officers (with a further eight officers to be trained in July 2016); and Operation NIMIS was launched in March 2016.

Operation NIMIS is a multi-faceted approach to education and enforcement around excessive speed and ASB driving. In collaboration with the council's Road Safety Engineering department, 20 hotspots have been identified across the borough. Local officers and colleagues from RTPC (based in Bow) deploy to these areas to utilise the Speed Gun. Court proceedings are initiated against all persons driving at excessive speed. This deployment also acts as high visibility policing, reinforcing the 20mph speed limit.

The second strand of Operation Nimis is Community Speed Watch. The pilot took place at Old Ford Road on the 24th March 2016, attended by a local councillor and ward residents. The Community Speed Watch initiative has been extended to all Councillors with the aim of it being replicated on all wards. These traffic operations will take place at the 20 hotspot areas and will tie-in with local SNT and ward priorities such as ASB; nuisance driving being a large complaint generator for the Council.

Operation NIMIS also incorporates a School Speed Awareness Campaign. Primary schools across the borough have been invited to take part in an MPS educational campaign aimed at drivers in the vicinity of school crossings. Any driver who exceeds the 20mph limit will be asked to complete a short questionnaire administered by the school children. If drivers do not wish to engage in this 'educational' activity, enforcement avenues will be pursued (if appropriate). This initiative is supported by the LBTH Public Health department who are assisting with the promotion of this scheme amongst educational facilities.

The final aspect of Operation NIMIS is a TPAC (pursuit trained officer) assisted operation. TPAC officers will support local units targeting offenders using vehicle to deal drugs. In the past 12 months there have been 172 fail to stop incidents, this is a tactic used by drug dealers to evade police and necessitates the need for a TPAC skilled driver. There is also work underway to explore the use of Field Impairment Test trained officers to target those offenders who are drug driving on the borough and there is an opportunity for this to complement a borough wide poster campaign commissioned by the Drug and Alcohol Action Team.

All results from Operation NIMIS are sent through to LBTH and will contribute to a paper on the 20mph speed limit due to be presented to the committee.

On 21st March 2016 local officers conducted a 'Super Cubo' targeting offender drivers and drug dealing at four locations across the borough. The objective of this traffic operation was to disrupt criminal activity; improve road safety and educate drivers. Approximately 80-100 cars were stopped; resulting in vehicle seizures for no insurance, a high proportion of drivers processed for driving offences and several arrests for drug related matters.

2015/16 Financial Year Crime Figures

Met Head Quarters, Performance and Assurance have confirmed that the baseline for the MOPAC 7 crime reduction target is the offence level during FY 2011/12, and FY 2015/16 is to be used to assess final performance against the total 20% reduction target. This table compares financial year 2015/16 performance against the previous financial year 2014/15

Major Classification	Minor Classification	Offences 2015/16	Offences 2014/15	% Change on 2014/15	Sanction Detection 2015/16	Sanction Detection 2014/15	SD Rate 2015/16	SD Rate 2014/15	% point change on 2014/15
Violence Against The Person	<i>Murder</i>	4	3	+33.3%	4	4	100%	133.3%	-33.3
	<i>Wounding / GBH</i>	998	920	+8.5%	255	274	25.6%	29.8%	-4.2
	<i>Assault with Injury</i>	1922	1808	+6.3%	555	581	28.9%	32.1%	-3.2
	<i>Common Assault</i>	2564	2427	+5.6%	458	442	17.9%	18.2%	-0.3
	<i>Offensive Weapon</i>	176	144	+22.2%	156	130	88.6%	90.3%	-1.7
	<i>Harassment</i>	3132	2472	+26.7%	412	412	13.2%	16.7%	-3.5
	<i>Other Violence</i>	371	277	+33.9%	122	123	32.9%	44.4%	-11.5
Sexual Offences	<i>Rape</i>	229	193	+18.7%	20	24	8.7%	12.4%	-3.7
	<i>Other Sexual</i>	363	371	-2.2%	58	54	16.0%	14.6%	+1.4
Robbery	<i>Personal Property</i>	1079	1094	-1.4%	99	85	9.2%	7.8%	+1.4
	<i>Business Property</i>	62	65	-4.6%	13	16	21.0%	24.6%	-3.6
Burglary	<i>Burglary in a Dwelling</i>	1298	1208	+7.5%	71	59	5.5%	4.9%	+0.6
	<i>Burglary in Other Buildings</i>	1253	1203	+4.2%	140	86	11.2%	7.1%	+4.1
Theft and Handling	<i>Theft/Taking of Motor Vehicles</i>	1120	929	+20.6%	101	55	9.0%	5.9%	+3.1
	<i>Theft form Motor Vehicles</i>	1564	1531	+2.2%	39	35	2.5%	2.3%	+0.2
	<i>Motor Vehicle Interference & Tampering</i>	376	299	+25.8%	18	12	4.8%	4.0%	+0.8
	<i>Theft from Shops</i>	1089	916	+18.9%	383	416	35.2%	45.4%	-10.2
	<i>Theft from Person</i>	1392	1319	+5.5%	19	54	1.4%	4.1%	-2.7
	<i>Theft/Taking of Pedal Cycles</i>	1134	1264	-10.3%	27	47	2.4%	3.7%	-1.3
	<i>Other Theft</i>	3585	3665	-2.2%	128	146	3.6%	4.0%	-0.4
	<i>Handling Stolen Goods</i>	81	68	+19.1%	73	63	90.1%	92.6%	-1.5
Fraud and Forgery	<i>Front Counted per Victim</i>	0	0	0%	2	0	NA	NA	NA
	<i>Other Fraud & Forgery</i>	32	22	+45.5%	18	6	56.3%	27.3%	+29.0
Criminal Damage	<i>Arson</i>	127	118	+7.6%	10	9	7.9%	7.6%	+0.3
	<i>Criminal Damage to a Dwelling</i>	526	534	-1.5%	86	79	16.3%	14.8%	+1.5
	<i>Criminal Damage to Other Building</i>	307	300	+2.3%	59	64	19.2%	21.3%	-3.1
	<i>Criminal Damage to Motor Vehicle</i>	854	874	-2.3%	72	60	8.4%	6.9%	+1.5
	<i>Other Criminal Damage</i>	549	557	-1.4%	97	99	17.7%	17.8%	-0.1
Drugs	<i>Drug Trafficking</i>	92	137	-32.8%	100	121	108.7%	88.3%	+20.4
	<i>Possession of Drugs</i>	1696	2048	-17.2%	1488	1836	87.7%	89.6%	-1.9
	<i>Other Drug Offences</i>	9	8	+12.5%	8	9	88.9%	112.5%	-23.6

Other Notifiable	<i>Going Equipped</i>	36	15	+140%	25	12	69.4%	80.0%	-10.6
	<i>Other Notifiable</i>	598	559	+7.0%	236	253	39.5%	45.3%	-5.8
Total Notifiable Offences (TNO)		28618	27348	+4.6%	5352	5666	18.7%	20.7%	-2.0
	<i>Violence with Injury</i>	2946	2752	+7.0%	827	867	28.1%	31.5%	-0.1
MOPAC 7 (total of all crimes highlighted in yellow)		13077	12484	+4.8%	1633	1568	12.5%	12.6%	-3.4
	<i>Gun Crime</i>	80	68	+17.6%	9	16	11.3%	23.5%	-12.2
	<i>Knife Crime</i>	569	508	+12.0%	102	98	17.9%	19.3%	-1.4
	<i>Domestic Abuse</i>	2978	2596	+14.7%	930	934	31.2%	36.0%	-4.8
	<i>Racist and Religious Hate Crime</i>	586	577	+1.6%	116	156	19.8%	27.0%	-7.2
	<i>Homophobic Crime</i>	89	80	+11.3%	10	10	11.2%	12.5%	-1.3

2015/16 Financial Year Performance Against the MOPAC Baseline Year 2011/12

Met Head Quarters, Performance and Assurance have confirmed that the baseline for the MOPAC 7 crime reduction target is the offence level during FY 2011/12, and FY 2015/16 is to be used to assess final performance against the 20% reduction target. This Table compares financial year 2015/16 performance against the MOPAC Baseline FY 2011/12.

Major Classification	Minor Classification	Offences 2015/16	Offences 2011/12*	% Change on 2011/12
Violence Against The Person	<i>Murder</i>	4	5	-20%
	<i>Wounding / GBH</i>	998	432	+131.0%
	<i>Assault with Injury</i>	1922	1554	+23.7%
	<i>Common Assault</i>	2564	1827	+40.3%
	<i>Offensive Weapon</i>	176	171	+2.9%
	<i>Harassment</i>	3132	1635	+91.6%
	<i>Other Violence</i>	371	193	+92.2%
Sexual Offences	<i>Rape</i>	229	138	+65.9%
	<i>Other Sexual</i>	363	293	+23.9%
Robbery	<i>Personal Property</i>	1079	1319	-18.2%
	<i>Business Property</i>	62	96	-35.4%
Burglary	<i>Burglary in a Dwelling</i>	1298	1538	-15.6%
	<i>Burglary in Other Buildings</i>	1253	1179	+6.3%
Theft and Handling	<i>Theft/Taking of Motor Vehicles</i>	1120	873	+28.3%
	<i>Theft form Motor Vehicles</i>	1564	1944	-19.5%
	<i>Motor Vehicle Interference & Tampering</i>	376	87	+332%
	<i>Theft from Shops</i>	1089	719	+51.5%
	<i>Theft from Person</i>	1392	1606	-13.3%
	<i>Theft/Taking of Pedal Cycles</i>	1134	1342	-0.6%
	<i>Other Theft</i>	3585	4412	-18.7%
Fraud and Forgery	<i>Front Counted per Victim</i>	0	974	-974%
	<i>Other Fraud & Forgery</i>	32	426	-92.5%
Criminal Damage	<i>Arson</i>	127	N/A	N/A
	<i>Criminal Damage to a Dwelling</i>	526	629	-16.4%
	<i>Criminal Damage to Other Building</i>	307	318	-3.5%
	<i>Criminal Damage to Motor Vehicle</i>	854	928	-8.0%
	<i>Other Criminal Damage</i>	549	589	-6.8%
Drugs	<i>Drug Trafficking</i>	92	226	-59.3%
	<i>Possession of Drugs</i>	1696	3481	-51.3%
	<i>Other Drug Offences</i>	9	16	-43.8%
Other Notifiable	<i>Going Equipped</i>	36	20	+80.0%
	<i>Other Notifiable</i>	598	423	+41.4%
Total Notifiable Offences (TNO)		28618	29463	-2.9%
	<i>Violence with Injury</i>	2946	2003**	+47.1%
MOPAC 7	(total of all crimes highlighted in yellow)	13077	13023	+0.4%
	<i>Gun Crime</i>	80	N/A	N/A
	<i>Knife Crime</i>	569	N/A	N/A
	<i>Domestic Abuse</i>	2978	N/A	N/A
	<i>Racist and Religious Hate Crime</i>	586	N/A	N/A
	<i>Homophobic Crime</i>	89	N/A	N/A

2015/16 Data provided in Metropolitan Police Tower Hamlets Borough Operational Command Unit Pre Release of Financial Year 2015/16 Crime Statistics (released 15.05.2016)

* 2011/12 MOPAC Baseline Data provided in Met Data Tables webpage Borough Totals extracted on 18.05.16

** 2011/12 MOPAC Baseline Data provided in Metropolitan Police Tower Hamlets Daily Dashboard produced on 16.05.16

N/A Data not available at time of writing

Strategic Assessment 2015

The Tower Hamlets Community Safety Partnership is required to produce an annual Strategic Assessment by the Crime & Disorder (Formulation & Implementation of Strategy) Regulations 2007. The regulations state that a strategic assessment needs to include:

- An analysis of the current community safety issues
- An analysis of the changes in those levels and patterns, and;
- The Partnership's priorities to tackle the local issues.

The Strategic Assessment 2015 has allowed the Partnership to fulfil its statutory duty to review this Community Safety Partnership Plan in 2015 and refresh it for the final year (2016/17) of its now 4 year term.

The Strategic Assessment production process is reviewed on an annual basis by the CSP's Strategy Group, which is made up of senior representatives of the borough's 6 Responsible Authorities as well as the CSP Subgroup Chairs. This review enables the Partnership to ensure that the Strategic Assessment contains and analyses all the key information required for the CSP to be able to effectively review its Community Safety Partnership Plan annually.

The partnership examined the context of current themes within community safety and took into account key national, regional and local priorities.

The Strategic Assessment was developed based on close analysis of data against the CSP's 42 priority performance indicators across its 11 priority themes (see below). Performance is monitored as part of the CSP's Priority Performance Dashboard at CSP meetings on a quarterly basis and at the relevant CSP Subgroup meetings.

The Partnership believed that these Priority Themes are the most efficient way to monitor data, and take into account the national, regional and local priorities. The current themes are:

- | | |
|-----------------------------------------------------------------------------|----------------|
| • Anti-Social Behaviour and Arson | (3 indicators) |
| • Drugs and Alcohol | (5 indicators) |
| • Hate Crime and Community Cohesion | (3 indicators) |
| • Killed or Seriously Injured | (1 indicator) |
| • Prevent | (New Priority) |
| • Property/Serious Acquisitive Crime | (7 indicators) |
| • Prostitution | (New Priority) |
| • Public Confidence & Victim Satisfaction | (3 indicators) |
| • Reducing Re-offending | (3 indicators) |
| • Violence (including Domestic Violence & Violence against Women and Girls) | (9 indicators) |
| • Youth Crime (Gangs and Serious Youth Violence) | (4 indicators) |

The statutory partners provided information on the above indicators and they have been reviewed in the Strategic Assessment in terms of the following factors:

- Data and Analysis: 1st October 2014 – 30th September 2015
- Trends over the last 3 years (October 2012 – September 2015)

In addition to the information supplied by the statutory partners, additional information was provided by Health with regards to the health needs of offenders with a summary from their Offender Health Joint Strategic Needs Assessment 2015 and the National Probation Service separate profile on the needs of the local offending population including any gaps in service.

Please note:

Due to the time scales and production schedule for the Community Safety Plan, we are unable to use full financial year figures in the Strategic Assessment.

Performance from Strategic Assessment 2015

1st October 2011 – 30th September 2015

'Total Crime' in Tower Hamlets							
Performance Indicator	Lead Agency for performance data & CSP Subgroup	Performance 2011/12 (Oct – Sept)	Performance 2012/13 (Oct – Sept)	Performance 2013/14 (Oct –Sept)	Performance 2014/15 (Oct –Sept)	Difference (+/-%) 2014/15 – 2013/14	Direction of Travel Oct 2011 – Sept 2015
Total Notifiable Offences	Police	29,369	27,971	26,374	28,056	+6.37%	-4.47%

Priority A: Gangs and Serious Youth Violence							
Performance Indicator	Lead Agency for performance indicator & CSP Subgroup	Performance 2011/12 (Oct – Sept)	Performance 2012/13 (Oct – Sept)	Performance 2013/14 (Oct –Sept)	Performance 2014/15 (Oct –Sept)	Difference (+/-%) 2014/15 – 2013/14	Direction of Travel Oct 2011 – Sept 2015
YOT Re-offending Rates – Percentage of cohort that re-offended (binary rate) – Quarterly percentage rates	YOT – YJB data	New indicator 2015/16	New indicator 2015/16	New indicator 2015/16	Q3 40.9% Q4 37.3% Q1 38.0% Q2 38.5%	-	-
Number of young people engaged with from the Police Gang Matrix	Police / YOS (YOT MB)	-	5 from top 10 25 associates	12 from top 10 Up to 5 associates per individual			
Number of young people entering the Youth Justice System for the first time (FTE)	YOT – YJB data	195 (12 months to June 2012)	133 (12 months to June 2013)	102 (12 months to June 2014)	112 (12 months to June 2015)	+9.8%	-42.6%
Rate of young people First Time Entrants (FTE) into the Youth Justice System per 100,000 young people	YOT – YJB data	n/a	n/a	n/a	481	-	-
% of custodial sentences compared to all court disposals	LBTH – YOT (YOT MB)	24 (5.8%) 24/413	20 (5.3%) 20/379	16 (7%) 16/230	17 No % or total available	+6.25%	-29.1% based on total figure

Priority B: Anti-Social Behaviour (including Arson)

Performance Indicator	Lead Agency for performance indicator	Performance 2011/12 (Oct – Sept)	Performance 2012/13 (Oct – Sept)	Performance 2013/14 (Oct – Sept)	Performance 2014/15 (Oct – Sept)	Difference (+/-%) 2014/15 – 2013/14	Direction of Travel Oct 2011 – Sept 2015
Number of Police CAD calls for ASB	Police (ASB OG)	17,784	17,452	16,052	14,304	-10.9% (-1,748)	-19.6% (-3,480)
Number of Arson incidents (all deliberate fires)	London Fire Brigade (ASB OG)	481	390	344	409	-18.9% (-65)	-15% (-72)
Number of Repeat Victims of ASB		736	749	735	643	-12.5% (-92)	-12.6% (-93)

Priority C: Drugs and Alcohol							
Performance Indicator	Lead Agency for performance indicator	Performance 2011/12 (Oct – Sept)	Performance 2012/13 (Oct – Sept)	Performance 2013/14 (Oct – Sept)	Performance 2014/15 (Oct – Sept)	Difference (+/-%) 2014/15 – 2013/14	Direction of Travel 2011-15 Oct – Sept
Number of alcohol users engaging in structured treatment Restricted NDTMS Data – Not for Public*	LBTH (DAAT)	-	-	-	-	-	-
Percentage of successful completions (drug treatment) who do not re-present within 6 months: Restricted NDTMS Data – Not for Public*	LBTH (DAAT)						
A) Opiates	DAAT	-	-	-	-	-	-
B) Non-opiates	DAAT	-	-	-	-	-	-
Number of young people engaged in drug / alcohol treatment Restricted NDTMS Data – Not for Public*	LBTH DAAT – PHE through NDTMS	-	-	-	-	-	-
Number of clients on IARP caseload also in structured treatment for:	LBTH (DAAT)						
A) Opiates	LBTH DAAT	Q3 375 (23%) Q4 367 (22%) Q1 No Data Q2 360 (23%)	Q3 364 (23%) Q4 334 (23%) Q1 385 (26%) Q2 382 (26%)	Q3 373 (25%) Q4 374 (26%) Q1 375(26%) Q2 367(25.7%)	Q3 378 (26.3%) Q4 372 (25.9%)	Not comparable	Not comparable
B) Non-opiates	LBTH (DAAT)	Q3 41 (20%) Q4 35 (16%) Q1 No Data Q2 22 (10%)	Q3 14 (7%) Q4 16 (8%) Q1 27 (14%) Q2 27 (13%)	Q3 28 (13%) Q4 38 (17%) Q1 27 (18.8%) Q2 25 (17.1%)	Q3 26 (16.7%) Q4 24 (13.5%)	Not comparable	Not comparable
C) Alcohol	LBTH (DAAT)			Q1 58 (11.7%) Q2 46 (9.6%)	Q3 47 (10.1%) Q4 46 (10.2%) Q1 39 (9.7%)	-	-
Number of arrests for Possession With Intent To Supply	Police (TTCG)	New indicator 2015/16	255	177	137	-22.6%	Not comparable
Possession With Intent To Supply Sanction Detection Rate	Police (TTCG)	New Indicator 2015/16	93.7% (239)	92.1% (163)	92% (126)	-0.1% pts (-37)	Not comparable
Possession Only (Arrests & Warnings)	Police (TTCG)	New Indicator 2015/16	1,369	1,315	993	-24.5% (322)	Not Comparable
Possession Only Sanction Detections	Police (TTCG)	New Indicator 2015/16	94.3% (1,290)	93.6% (1,231)	90.8% (902)	-2.8% pts (-329)	Not Comparable

Priority D: Violence (including Domestic Violence and Violence Against Women and Girls)

** Please note: Due to historic under reporting of violence against women and girls, significant work is being undertaken to increase both confidence in reporting and early reporting of these offences/crimes, to ensure that the actual levels are established. More importantly, so that the victim/survivors receive partnership support at the earliest possible opportunity. Due to this work, we hope that this will have an impact (increase) on the number of reports of violence against women and girls, particularly the Number of Domestic Violence Offences, Rapes and Other Serious Sexual Offences as seen below.

Performance Indicator	Lead Agency for performance indicator	Performance 2011/12 (Oct – Sept)	Performance 2012/13 (Oct – Sept)	Performance 2013/14 (Oct – Sept)	Performance 2014/15 Oct – Sept)	Difference (+/-%) 2014/15 – 2013/14	Direction of Travel Oct 2011 – Sept 2015
Number of Domestic Violence Reports to Police	Police (TTCG)	New Indicator 2015/16	1,919	2,178	2,354	+8.1% 176	Not comparable
Domestic Violence Conviction Rate ('cracked cases')		New indicator 2015/16	New indicator 2015/16	New indicator 2015/16	68%	Not comparable	Not comparable
Domestic Violence Sanction Detection (SD) Rate	Police	New Indicator 2015/16	45.6%	34.8%	33.4%	-1.4% pts	Not comparable
Percentage of Domestic Crimes that involve repeat victims	Police	New Indicator 2015/16	21.52%	15.87%	23.48%	+7.61% pts	Not comparable
Decrease Unsuccessful Prosecutions and Rate against total	LBTH (DV Forum)	New Indicator 2015/16					
Number of Rapes and Other Serious Sexual Offences	Police (TTCG)	New indicator 2015/16	228	249	323	+29.7% (+74)	Not comparable
Number of individual crimes of Stalking and Harassment recorded	Police (VAWG)	New indicator 2015/16	403	499	458	-8.2% (-41)	Not comparable
Number of cases of Harmful Practices of Female Genital Mutilation (FGM) recorded	VAWG	New indicator 2015/16	0	3	6	+100% (+3)	Not comparable
Number of cases of Harmful Practices of Honour Based Violence recorded	VAWG	New Indicator 2015/16	6	7	10	+42.9% (+3)	Not comparable
Number of cases of Harmful Practices of Forced Marriage	VAWG	New indicator 2015/16	3	4	2	-50% (-2)	Not comparable
Number of professionals receiving training and reporting increased awareness of VAWG	VAWG	New Indicator 2015/16	200	768	1048	+33.9% (+260)	Not comparable
Number of offences of Violence With Injury (Non-Domestic Abuse)	Police (TTCG)	Data not supplied	1,480	1,708	1,983	+16.1% (+275)	+35.7% (+503)
Number of Offences of Violence With Injury (Domestic Abuse)	Police (TTCG)	Data not supplied	736	740	844	+14.1% (+104)	+14.7% (+108)

Priority E: Prostitution							
Performance Indicator	Lead Agency for performance indicator	Performance 2011/12 (Oct – Sept)	Performance 2012/13 (Oct – Sept)	Performance 2013/14 (Oct – Sept)	Performance 2014/15 Oct – Sept)	Difference (+/-%) 2014/15 – 2013/14	Direction of Travel Oct 2011 – Sept 2015
Number of women referred to the Prostitution MARAC	TBC	New indicator 2016/17	New indicator 2016/17	New indicator 2016/17	New indicator 2016/17	-	-
Number of women re-referred to the Prostitution MARAC	TBC	New indicator 2016/17	New indicator 2016/17	New indicator 2016/17	New indicator 2016/17	-	-

Priority F: Hate Crime and Cohesion							
<p>Please note: Due to historic under reporting of hate crime, significant work is being undertaken to increase both confidence in reporting and early reporting of these offences/crimes, to ensure that the actual levels are established. More importantly, so that the victims receive partnership support at the earliest possible opportunity. The performance data below is in the format/categories provided by the police, unfortunately this does not disaggregate it into the 7 strands of hate crime (Disability; Race or Ethnic Identity; Religion/Belief; Gender or Gender Identity; Sexual Orientation; Age and Immigration Status or Nationality), which has historically only been recorded by the police as Race and Religious or Homophobic incidents/crimes. Due to this work, we hope that this will have an impact (increase) on the number of reports of all types of hate incidents/crimes, thus reducing the historical under-reporting, as seen below.</p>							
Performance Indicator	Lead Agency for performance indicator	Performance 2011/12 (Oct – Sept)	Performance 2012/13 (Oct – Sept)	Performance 2013/14 (Oct-Sept)	Performance 2014/15 Oct – Sept)	Difference (+/-%) 2014/15 – 2013/14	Direction of Travel Oct 2011 – Sept 2015
Overall Hate Crime (reported to Police) Please see above explanatory note	Police (NPFHF)	New indicator 2015/16	480	527	582	+10.4% (+55)	Not comparable
Overall Hate Crime Sanction Detection (SD) Rate	Police (NPFHF)	New indicator 2015/16	13.3% (64/480)	10.2% (54/527)	8.6% (50/582)	-1.6% pts	Not comparable
Hate Crime cases reviewed at the monthly Hate Incident Panel which resulted in action being taken	LBTH (NPFHF)	New indicator 2015/16	73	120	No data available	Not comparable	Not comparable
Hold 4 Tension Monitoring Group (TMG) Meetings per year with additional emergency meetings when required	LBTH (TMG)	New Indicator 2015/16	4 + emergency meetings	4 + emergency meetings	4 + emergency meetings	-	Not comparable

Priority G: Killed or Seriously Injured on our roads							
Performance Indicator	Lead Agency for performance indicator	Performance 2011/12 (Oct – Sept)	Performance 2012/13 (Oct – Sept)	Performance 2013/14 (Oct-Sept)	Performance 2014/15 Oct – Sept)	Difference (+/-%) 2014/15 – 2013/14	Direction of Travel Oct 2011 – Sept 2015
Number of persons killed or seriously injured on road	Police (KSI)	142 Aug 2011 – July 2012	132 Aug 2012 – July 2013	44 Aug 2013 – July 2014	46 Jan 2015 – July 2015	Not comparable	Not comparable

Priority H: Property/Serious Acquisitive Crime							
Performance Indicator	Lead Agency for performance indicator	Performance 2011/12 (Oct – Sept)	Performance 2012/13 (Oct – Sept)	Performance 2013/14 (Oct – Sept)	Performance 2014/15 Oct – Sept)	Difference (+/-%) 2014/15 – 2013/14	Direction of Travel Oct 2012 – Sept 2015
Number of Personal Robberies	Police (TTCG)	Data not supplied	1,169	1,030	1,057	+2.6% (+27)	-9.6% (-112)
Number of Residential Burglaries	Police (TTCG)	Data not supplied	1,528	1,215	1,252	+3% (+37)	-18.1% (-276)
Number of Theft of Motor Vehicles	Police (TTCG)	Data not supplied	894	942	1,025	+8.8% (+83)	+14.7% (+131)
Number of Theft From Motor Vehicles	Police (TTCG)	Data not supplied	1,685	1,613	1,566	-2.9% (-47)	-7.1% (-119)
Number of Theft from Persons	Police (TTCG)	Data not supplied	1,756	1,281	1,411	+10.1% (+130)	-19.6% (-345)
Number of Non-Residential Burglaries	Police (TTCG)	Data not supplied	1,396	1,232	1,179	-4.3% (-53)	-15.5% (-217)
Number of Theft of Pedal Cycles	Police (TTCG)	Data not supplied	1,338	1,309	1,109	-15.3% (-200)	-17.1% (-229)

Priority I: Prevent							
Performance Indicator	Lead Agency for performance indicator	Performance 2011/12 (Oct – Sept)	Performance 2012/13 (Oct – Sept)	Performance 2013/14 (Oct-Sept)	Performance 2014/15 Oct – Sept)	Difference (+/-%) 2014/15 – 2013/14	Direction of Travel Oct 2011 – Sept 2015
No performance indicators set or data available to share, this is a new standalone priority for 2016/17	-	-	-	-	-	-	-

Cross-Cutting Priority 1: Public Confidence and Victim Satisfaction							
Performance Indicator	Lead Agency for performance indicator	Performance 2011/12 (Oct – Sept)	Performance 2012/13 (Oct – Sept)	Performance 2013/14 (Oct – Sept)	Performance 2014/15 Oct – Sept)	Difference (+/-%) 2014/15 – 2013/14	Direction of Travel Oct 2011 – Sept 2015
Percentage of community concerned with ASB (Public Attitude Survey) – How much of a problem are teenagers in the street?	Police (Confidence and Satisfaction Board)	41 (FY 2011-12)	39 (FY 2012-13)	40 (Oct 2013 – Sept 2014)	43 (Oct 2014 – Sept 2015)	3% pts	2% pts
Overall Victim Satisfaction (with Police Service)	Police (Satisfaction Board)	70% (FY 11/12)	74% (FY 12/13)	72% (FY 13/14)	76% (September 2015)	4% pts	6% pts
Overall confidence of Police doing a good job	Police (Confidence Board)	61% (FY 12/13)	63% (July 12 – June 13)	55% (Oct 2013 – Sept 2014)	64% (Oct 2014 - Sept 2015)	9% pts	3% pts

Cross-cutting Priority 2: Reducing Re-offending							
Performance Indicator	Lead Agency for performance indicator	Performance 2011/12 (Oct – Sept)	Performance 2012/13 (Oct – Sept)	Performance 2013/14 (Oct – Sept)	Performance 2014/15 Oct – Sept)	Difference (+/-%) 2014/15 – 2013/14	Direction of Travel Oct 2011 – Sept 2015
Number of offenders on IOM Cohort 18+ who have reduced offending Data Not Available for Strategic Assessment Period, see Separate Table below with	Probation (RRB)	-	-	Unable to compare as data only available	Unable to compare as data only available	Not comparable	Not Comparable

Quarterly performance available under all elements of this indicator from operational IOM Scheme				Quarterly over 18 month period	Quarterly over 18 month period		
Jigsaw: Staff to high risk offender ration	Police (Police)	Data not supplied	Data not supplied	Data not supplied	1:13.8 Supervising 49.8 RSOs	Improvement reduced ratios over period	Improvement reduced ratios over 3 year period

Cross-cutting Priority 2: Reducing Re-offending – IOM Reduced Re-offending Available Data

Performance Indicator	Lead Agency for performance indicator	Performance April – June 2014	Performance July – August 2014	Performance October – December 2014	Performance January – March 2015	Performance April – June 2015	Performance July – September 2015
Number of offenders on IOM Cohort 18+ who have reduced offending Red to Amber on Cohort	Probation (RRB)	12	6	8	7	7	1
Number of offenders on IOM Cohort 18+ who have reduced offending Amber to Green on Cohort	Probation (RRB)	0	2	2	9	8	5
Number of offenders on IOM Cohort 18+ who have reduced offending Green to Removal	Probation (RRB)	0	34	3	7	30	18
Average number of arrests per offender per month	Probation (RRB)	0.1	0.11	0.24	0.26	0.29	0.25
MOPAC 7 Offenders (those whose primary offence is one of MOPAC 7 crimes)	Probation (RRB)	Not Collected	Not Collected	28	39	53	55

Public Consultation

As part of the Partnership's statutory duties to consult the community on community safety in the borough, an extensive 5 week public consultation took place during May and June 2012. The consultation asked members of the public (residents and business people), partnership and community groups/organisations for their top three community safety priorities.

People were made aware of the consultation via press articles, letters and email alerts. They were given the opportunity to attend their local Police Safer Neighbourhood Team's Public Meeting, a Borough Public Meeting and/or an Elected Members' Consultation Session. In addition they could reply in writing /email or respond via the dedicated webpage.

In total 1,013 responses were received, the majority of which (862) were collected through the dedicated web page (Mytowerhamlets) survey. This collection method also enabled us to monitor the equalities data of those 862 recipients against the Greater London Assembly's 2011 data, full findings of which are included in Public Consultation Report. In summary 65.71% of recipients identified their ethnicity as White (17 percentage point overrepresentation) and 20.36% as Bangladeshi (14 percentage point underrepresentation). In terms of Gender, 42% of respondents were female and 58% were male, which shows a 6.5 percentage point underrepresentation for female. The largest group of respondents were those aged between 25 and 39 years of age, making up 50.2% (3.2% overrepresentation) of respondents and the smallest group being the 0 to 16 age group, making up only 5.1% (14.9% underrepresentation), however we cannot expect infants and minors to respond, so we cannot make meaningful statements about this. Those aged between 17 and 24 years made up 9% of respondents, which is an 11 percentage point underrepresentation.

Results:

Based solely on the number of selections by members of the public in Tower Hamlets across all the different collection methods, the top 4 community safety priorities for the Community Safety Plan 2013-17 are:

1) Anti-Social Behaviour (ASB)	298
2) Serious Acquisitive Crime	200
3) Drugs and Alcohol	196
- Violence	196

In 2015/16 as part of the Partnership's statutory duty to consult, the Safer Neighbourhood Board held five Resident's Question Time public meetings, where anyone in the borough was able to raise community safety issues with senior officers from the Partnership. During these five themed events the residents' and local community groups' main concerns were:

- Drugs & Alcohol
- Anti-Social Behaviour and Noise
- Cycle Lanes and Road Safety
- Public Confidence and response times to reports
- Use of CCTV
- Historic/Repeat Hotspots for ASB

Priorities – How the Partnership Decided

In December 2012, the Community Safety Partnership was presented with the Strategic Assessment 2012, an Executive Summary of the Strategic Assessment 2012, the Public Consultation Report and a paper which made recommendations based on their findings. These documents were used along with internal/external partnership priorities, when the partnership originally set its priorities for the full term of the plan back in March 2013.

It is a statutory duty of the Community Safety Partnership to review the Community Safety Plan annually, based on the findings of its annual Strategic Assessment.

In January 2016, the Community Safety Partnership was presented with the Strategic Assessment 2015, which included public consultation findings from 2015/16 and made recommendations to the Partnership which were discussed and the priorities formally reviewed.

The recommendations took into account the original Community Safety Partnership Plan 2013-17 Priorities, areas where trends were going in the wrong direction, areas which the partner agencies had highlighted as being priorities for all the partnership and existing priorities external to the partnership i.e. Home Office, MOPAC and Community Plan as well as the public's perception/priorities.

The draft CSP Plan 2013-17 reviewed for Year 4 (final year of the now 4 year term) amended to take into account those discussions during the January CSP meeting was then presented to the CSP on 3rd May 2016 for discussion.

There are some areas of work which are priorities for individual and/or several partner agencies which the Community Safety Partnership has also taken into account when agreeing its own priorities for the term of this plan. These priorities that have not been deemed a priority by/for the Partnership will continue to remain priorities for those individual agencies and their performance will continue to be monitored and managed by each respective agency.

Priorities for 2013 -2017

The Partnership recognises that it has a responsibility to address all areas of crime, disorder, anti-social behaviour, substance misuse and re-offending as part of its core business. However, it also recognises that there are a few particular areas, which have a greater impact on the people of Tower Hamlets and their quality of life. For this reason, it has agreed that it will place an added focus on these areas and they will form the priorities during the term of this plan.

As part of the Community Safety Partnership's statutory duty to review its Plan on an annual basis, in March 2016 the CSP Co-chairs reviewed the current CSP Plan Priorities based on the findings of the 2015 Strategic Assessment and agreed that the following would be the priorities for the final year (2016/17) of this Plan's 4 year term:

- **Gangs and Serious Youth Violence**
- **Anti-Social Behaviour and Arson**
- **Drugs and Alcohol**
- **Violence (inc. Domestic Violence & Violence Against Women and Girls)**
- **Prostitution**
- **Hate Crime and Cohesion**
- **Killed or Seriously Injured**
- **Prevent**
- **Public Confidence & Victim Satisfaction**
- **Reducing Re-offending**
- **MOPAC 7**

Priority A:

Gangs and Serious Youth Violence

Why is it a priority?

Tower Hamlets has one of the highest proportions of young people as a percentage of its population compared to other boroughs both in London and nationally. Whilst Tower Hamlets does not have a significant gang problem compared to other London Boroughs its prevalence is growing here, there are a small number of geographically based gangs in the borough, who sporadically come into conflict with each other. These gangs are responsible for a significant amount of the borough's youth crime and drug dealing. The effects that gangs and incidents of serious youth violence, although both uncommon, have on members' of the wider communities feeling of safety, especially other young people, makes this a priority for the Community Safety Partnership to address.

The borough saw a 27% reduction in the number of serious youth violence incidents and therefore victims for the period October 2011 – September 2012 when compared to the previous year. However, it is common to see increases and decreases, year on year as they can be skewed by unexpected events.

Young people aged 8 - 17, which form the Youth Offending Service's service users' age cohort, account for 10.4% of the Tower Hamlets population (27,280 residents^[1]). This is above the proportion those aged 0 to 17 for Inner London which stands at 9.8% of the population, but below the figure for Greater London of 11%

This age group is projected to increase in size by 7.8% over the next 5 years^[2] to reach 29,400 8 - 17 year olds by 2017. It is then projected to increase further over the following 5 years to reach 33,426 residents by 2022, which represents a 22.5% increase over the current 2012 number.

Responsible Board/CSP Sub-group:

Youth Offending Team Management Board
Reducing Re-offending Board
Strategic Operational Group – EGGSYV (Ending Guns, Gangs and Serious Youth Violence)

What will we aim to achieve this year?

- Reduce the levels of ASB, Drugs, Homicide, Firearms discharges, Knife crime, and Serious Youth Violence
- Reduce First Time Entrants (FTE) to the youth justice system by early intervention
- Reduce the harm caused by street gangs across the borough

^[1] ONS 2011 Census

^[2] GLA SHLAA population projections – 2012 Round

- Reduce re-offending
- Reduce the use of custody, especially remands into custody
- Focus activity towards offenders who present most risk and harm to the community
- Support interventions to prevent young people from becoming involved in gang crime, radicalisation and serious youth violence
- Improve the numbers of young offenders in Education, Training and Employment
- With partners, offer practical assistance to individuals wishing to stop their involvement in gang criminality
- Engage young people on the periphery of gangs in positive activities
- Deliver sturdy enforcement of the law against those who persist with gang criminality, ASB, drugs, knife crime and youth violence
- Make best use of all available Criminal Justice opportunities to prevent and disrupt gang criminality and bring offenders before the courts
- Train magistrates in the work we are doing in respect of gangs
- Ensure there is process for the community to provide information and we can demonstrate it has been acted upon
- Run a violent offender group-work programme via the Youth Offending Service
- Become actively involved in the Safe and Secure Project
- Work with Troubled Families, the Youth Service and Docklands Outreach to increase and improve our work with the Trauma unit (A&E screening and outreach to young victims of violence) at The Royal London Hospital
- The hospital is reporting growing numbers of stabbing injuries and one wounding by gunshot. Between Jan-October 2014: 430 people were seen at the Royal London with serious stab wounds. In the last 10 days 19th-29th of June 2015 there was 22 serious assaults with knives and 1 gunshot wound. The ages range from 12-25. It is important to note that the majority of patients do not come from Tower Hamlets, with approximately 2 within the 10 days data that came from Tower Hamlets postcodes.

How will we measure success?

- Number of Serious Youth Violence incidents
- Number of young people engaged with through the Police Gang Matrix
- Reduction in the number of First Time Entrants into the Criminal Justice System
- Number of young people from Police Gang Matrix:
 - Placed in Education, Training or Employment
 - Placed in suitable housing
- Re-offending Rates
- Police Public Attitude Survey
- Community Tension Reports
- Reducing Youth on Youth Violence through Rapid Response Team in identified Hotspot zones (identified by partners)
- YJB YOT rating reports (quarterly)
- Number of young people engaged via staff deployment in RLH A&E and Trauma ward.
- Number of young offenders given custodial sentences for SYV

How will we do this?

Youth Offending

- Identification and Priority Cohort – the key trigger for diversion and engagement targeted support and enforcement measures will be based on intelligence about young people shared between key partners and stakeholders.
- Support and enforcement to Young people (8-17 years) at risk of involvement in violent behaviour (including victims of SYV); those seeking a route out of violence and gang culture; and those being considered for enforcement measures due to refusing to exit violent lifestyles.
- Referrals will continue to come from schools to the Social Inclusion Panel and support will extend to siblings of the target cohort as well as children of adult offenders via the Youth Inclusion Support Programme. The Youth Offending Prevention Service will build on its existing referral mechanisms for parents and self-referrals.
- Referrals from Royal London Hospital A&E and Trauma wards
- We will also build on the Council's current arrangements for ASB enforcement measures and Gang Injunctions to ensure that young people have access to support services to prevent further escalation.
- Young people supported through diversion and engagement will be formally assessed using the Youth Justice Board's assessment framework. Assessments will aid the development of integrated action plans for each young person, determine and manage risks, taking into account safeguarding concerns.
- Interventions will be initiated via letter to both the young person and his/her guardian.
- Support available includes education, training, employment, accommodation (Police – Safe and Secure Initiative), substance misuse services, parental support, violent offenders/identity workshops, mentoring and positive activities, health and emotional wellbeing services and having a named key-worker.
- Early enforcement includes Behaviour Contracts (including exclusion zones and prohibitions), joint home visits and we would like to introduce the use of 'Buddi' monitoring tags.
- Civil enforcement including Gang Injunctions, Parenting Orders, Anti-Social Behaviour Orders and Individual Support Orders.
- The Youth Offending Team and the Family Intervention Service will combine to provide a more holistic, whole family approach to young people who offend or are at risk of offending, including a clinical response to young people and other family members who are experiencing low to medium mental health support needs.

Integrated Youth and Community Service

- The service will work in partnership with the police and respond to "Youth on Youth Violence" issues and engage them in to structured learning opportunities.

Supporting Stronger Families

- Supporting Stronger Families is the Council's response to the Troubled Families Programme. It will enhance the work of the Police and Youth Offending Team to broaden the offer of support and therapeutic intervention to the families of young people whose lives are affected by gangs. Outcomes are linked to the PBR element of the troubled families programme and focus primarily on reducing offending, increasing educational attendance and achievement and in getting young adults and their parents either into work or on the way to work.

Police

- The Police will use a range of activities in their approach to tackling Gangs and Serious Youth Violence. These will include activity analysis, weapons seizures, arrests, detections, search warrants, CHIS coverage and financial investigation and more frequent use of obtaining CBO (Criminal Behaviour Orders) and a more 'offender' approach.
- Produce Gang Related Intervention Profiles (GRIPs) on each individual which will include information on and from MATRIX analysis, reaching minimum threshold, intelligence coverage and whether they have been convicted in the past 6 months, charged in the past 3 months, under judicial restriction, named in proactive enquiry, a subject of financial investigation, engaging in a diversionary scheme and/or have no restrictions or current interventions in place.
- Other activities include targeting habitual knife carriers, supporting repeat knife crime victims, and continuing the knife prevention work with schools, youth centres and so on.
- The police have realigned resources to meet the specific profile of the borough; a police inspector now manages the Gangs Unit, police YOT, youth/schools officers and the boroughs police cadets. The inspector will work with partners to help prevent young people from becoming involved with gangs and/or crime.

LSCB

LSCB to take forward actions identified in the Thematic Review – Older Children Who Have Caused Serious Harm or Come to Harm

What we will aim to achieve over the term of this plan?

- Aim to alter the public's perception and increase both confidence and satisfaction
- Increase the number of gang nominal's in custody by 20% of the 140 on the Matrix
- Increase the number of those exiting gang related offending
- Focus enforcement work on those who reject the offer of intervention
- Increase the use of the family intervention: proportion of gang nominals supported within a Family Intervention context
- Increase the proportion of those supported into Education, Training and Employment

- Provide meaningful community engagement and full multi-agency collaboration and communication
- Through early intervention improve PRU and school truancy rates of those in the cohort
- Develop effective Accident & Emergency data sharing
- Provide enhanced offender management for gang members
- Maintain a fast response to critical incidents
- Develop shared ownership; strong leadership; information sharing; assessment and referral and targeted services
- To be able to identify what success is for key agencies, young people, families, government and for those involved in serious youth violence

Priority B:

Anti-Social Behaviour and Arson

Why is it a priority?

Anti-social behaviour (ASB) impacts fundamentally on our quality of life. It is therefore a National and Local priority.

ASB includes a variety of behaviours which adversely affect individuals and the areas in which they live, work and visit. Noise, graffiti, abandoned cars, fly-tipping, intimidation and threatening behaviour all leave those affected feeling frustrated, angry or frightened. It eats away at the cohesiveness of our communities and the attractiveness of our borough.

Tower Hamlets Community Safety Partnership works with partners to reduce ASB, mitigate its impact and prevent its recurrence. It wants residents and those who visit and work in the borough to feel safe and enjoy the area.

Arson for the purpose of this plan refers to deliberate fire-setting in the borough, the majority of which is deliberate bin fires on housing estates which are a significant threat to life due to the risks to residential properties.

Responsible Board/CSP Sub-group:

ASB Strategy Group
Tactical Tasking and Co-ordinating Group

What will we aim to achieve this year?

- Analyse incidents reported to all partners, including Police data, to identify and respond more effectively to the needs of victims
- Reduce the number of individual callers contacting 101 more than 10 times regarding anti-social behaviour
- Reduce the number of ASB incidents through targeted prevention and diversion interventions
- Reduce the number of incidents of vandalism
- Reduce the number of incidents of arson

How will we measure success?

- Number of calls to Police (101 or 999) for ASB**
- RSL ASB (no. of ASB incidents reported) data

** Using Metropolitan Police definition of Anti-social behaviour

- Number of young people engaged by the Youth Inclusion and Support Programme
- Number of incidents of Criminal Damage
- Improved Public Confidence and Victim Satisfaction
- Number of Arson incidents – All Deliberate Fires
- Number of Accidental Dwelling Fires
- Number of Primary Fires in Non-Domestic Buildings

How will we do this?

- Operational meetings between Police, Fire Brigade, Council ASB and Integrated Youth & Community Service (including Rapid Response Team) together with key partners (including Housing Providers) to prioritise resource tasking, including Tower Hamlets Enforcement Officers (THEOs)
- Better analysis through enhanced information sharing and improved data collection
- Measuring effectiveness of cluster/ward team actions and intervention
- By better use and co-ordination of civil tools and legislative powers available to landlords to tackle ASB in neighbourhoods
- Effective and consistent use of informal interventions to avoid criminal justice system particularly for younger offenders – e.g. acceptable behaviour contracts, agreements and undertakings
- Taking opportunities of environmental, regeneration and development projects to ‘design-out’ ASB
- Engage young people in services and opportunities to get involved – especially during school holiday periods
- Enhancing the ASB Partnership Action Group to support vulnerable and at risk victims
- Working together with LFB to reduce risk of arson by reducing dumped rubbish and fly-tipping, and developing a more effective reporting mechanism for residents

What we will aim to achieve over the term of this plan?

- Year-on-year 10% reduction in ASB incidents
- Improve the service to victims from Neighbourhood Policing Team by early identification and differentiation of ASB incidents from crime reports
- Improve standing from 2nd highest to 5th (or better) contributor of London’s ASB incidents
- Proactively use new powers, ensuring partners are trained and utilisation is consistent across the borough
- Develop bespoke interventions that minimise recidivism, focusing especially on young people
- Reduction in incidents of vandalism
- Identify the support needs of vulnerable and at risk victims and work with statutory, third sector and other agencies to provide effective interventions

Priority C:

Drugs and Alcohol

Why is it a priority?

There is a clear link between dependent users of Class A Drugs (like heroin and crack cocaine) with burglary, robbery, theft from a person or vehicle (collectively known as Serious Acquisitive Crimes), fraud, shoplifting and prostitution, which they commit in order to fund the drug dependency.

The effects of alcohol on the body mean it is often more likely for the drinker to either be a victim or perpetrator of crime. Alcohol is often linked to both violence and anti-social behaviour. Its use is particularly linked to incidents of domestic abuse and violence.

Treatment for drug and alcohol users, particularly young people is important so that their health and well-being is safeguarded and they make a positive contribution to their local communities.

Responsible Board/CSP Sub-group:

Drug and Alcohol Action Team (DAAT) Management Board

What will we aim to achieve this year?

- Implement new treatment services and deliver a visible launch with comprehensive messages regarding substance misuse and where to get help
- Develop and implement an annual multi-agency communications plan for service users and professionals
- Ensure identification and brief advice interventions are routinely offered to adult clients across a range of frontline services
- Deliver training across Young People services to ensure a child's rights based approach
- Ensure family support is available to address the impact of parental substance misuse
- Establish a robust approach to carer involvement and support
- Ensure widespread distribution of Naloxone injections to reduce the incidence of drug related deaths
- Implement robust referral pathways between hostels and treatment services that maximise the skills and capacity of the total workforce
- Work with treatment services and CRC to maximise the utilisation and effectiveness of Drug Rehabilitation Requirements (DRRs) and Alcohol Treatment Requirements (ATRs) to reduce offending of those misusing substances
- Review and recommission GP based drug / alcohol treatment services to ensure general health outcomes for drug / alcohol users in treatment are improved

- Improve services available to substance misusing young people who have a concurrent mental health issue
- Recommission Young People's substance misuse service to ensure timely and comprehensive intervention for young people experiencing problems with drugs / alcohol
- Develop and implement a Community Alcohol Partnership scheme in Mile End that targets the issues around underage drinking
- Consult on the introduction of a late night levy to help fund the costs associated with the night time economy
- Increase in the number of successful completions for those on Alcohol Treatment Requirement & Drug Rehabilitation Requirements
- Enforce the new Psychoactive Substances Act
- Disrupt the supply of drugs, including harmful legal highs, through effective enforcement and legislation
- Adopt and implement a new Substance Misuse Strategy for 2016-2019

How will we measure success?

- Number of users of opiates that left drug treatment successfully (free of drug(s) dependence) who do not then re-present to treatment again within 6 months, as a percentage of the total number of opiate users in treatment
- Number of alcohol users engaging in structured treatment
- Number of DIP (criminal justice) clients engaging in structured treatment
- Number of young people entering structured drug / alcohol treatment
- Number of planned exits from alcohol treatment
- Number of arrests for Possession With Intent To Supply
- Possession With Intent To Supply Sanction Detection Rate
- Possession Only (Arrests & Warnings)
- Possession Only Sanction Detections

How will we do this?

- Deliver widespread training and awareness campaigns
- Conduct the defined procurement process to award contracts for new drug / alcohol treatment services
- Educate frontline professionals and residents about the harms and risks associated with the use of legal highs.
- Utilise the full range of legislation and powers to tackle drug / alcohol related ASB and crime
- Ensure all partners are fully committed to delivery of the Substance Misuse Strategy 2016-19
- Further develop and implement data capture and needs assessment processes to ensure we are fully aware of met and unmet needs across the borough

What we will aim to achieve over the term of this plan?

- Improved access and uptake of increasingly effective treatment interventions which in turn reduce drug / alcohol related re-offending

Priority D:

Violence (including Domestic Violence and Violence Against Women & Girls)

Why is it a priority?

Violent crime is defined by the Home Office as robbery, sexual offences and violence against a person (ranging from assault without injury to homicide). The number of incidences of Most Serious Violence (GBH and above) in the borough has shown a significant increase over the 12 months measured in the Strategic Assessment 2013, up by 48% (173 incidents).

The strategic assessment figures above show that the number of Domestic Violence with Injury Offences has increased over the last 2 years i.e. since the baseline year (Oct 11-Sept 12), it has increased by 34.9% (188 recorded incidents), however it has remained stable in the last year compared to the previous year. This increase in domestic violence offences being recorded by the Police could be attributable to an increase in incidents being recorded as crimes rather than “non-crime incidents”, although at present there is no data to support an increase in the proportion of incidents that are treated as crimes by the Police. It is hoped that the data is attributable to increased reporting rates, as so much of our partnership work is focussed on increasing confidence in reporting, to address the huge problem of underreporting of this type of crime.

Domestic violence affects both adults and children and has serious consequences for victims and witnesses. Evidence shows that domestic violence is experienced for a number of years, on average, before it is reported to the police for the first time.

Particular focus will be placed on Domestic Violence within this priority as well as all of the other strands of Violence Against Women and Girls (VAWG) contained within the borough’s VAWG Plan, namely:

- Rape and Sexual Violence
- Domestic Violence (DV)
- Trafficking
- Prostitution
- Sexual Exploitation (including Child Sexual Exploitation)
- Female Genital Mutilation (FGM)
- Forced Marriage (FM)
- So called Honour Based Violence (HBV)
- Dowry Related Abuse
- Harassment
- Stalking

Across the partnership we have agreed to adopt the cross-Government definition of domestic violence and abuse which reads: -

"Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality."

This definition incorporates most of the VAWG strands and a wide range of abusive and controlling behaviours including physical, sexual, financial, emotional and psychological abuse, which contribute to the increase in violence across the borough. The cross-cutting nature of the Violence Against Women and Girls agenda means that responsibility for tackling these issues falls across a wide range of different agencies. Co-ordinating service provision and ensuring clear governance and accountability for this agenda is therefore a key challenge and a priority for the borough.

Responsible Board/CSP Sub-group:

Tactical Tasking and Co-ordinating Group
Domestic Violence (DV) Forum
Violence Against Women & Girls (VAWG) Steering Group

What will we aim to achieve this year?

- Sign off of the VAWG strategy by Cabinet to underpin local outcomes and delivery
- A reduction in the volume of non-domestic violence recorded Violence with injury compared with 2012/13 performance
- An increase in the proportion of domestic incidents that are recorded as crimes versus non-crime incidents by the Police.
- Improved sanctioned Detection rates for violence with injury (domestic and non-domestic) i.e. offences brought to justice.
- Increase in the reporting of domestic abuse and sexual violence to the Police
- Developing partnership work across the borough to ensure that Safeguarding Policies are adhered to by all agencies
- Continuation of the DV One Stop Service in its new location and with its expanded remit across all the VAWG strands.
- Increase in victim satisfaction from cases heard at the Specialist Domestic Violence Court
- Decrease in unsuccessful prosecutions of cases heard at the Specialist Domestic Violence Court
- Ensure monthly target of cases heard at MARAC per fortnight are met.
- Offer security installations to up to 60 households affected by domestic violence.
- Increase the number of DV perpetrators being referred to and accessing perpetrator programmes within the borough
- Run a violent offender group-work programme in the Youth Offending Team including an offensive weapon and joint enterprise session.
- Reduce the number of incidents of Violence with Injury
- Increased numbers of Tower Hamlets service users accessing the Haven, the Independent Sexual Violence Adviser (ISVA) and East London Rape Crisis (ELRC)
- Increased numbers of female genital mutilation (FGM) cases identified

- Increased numbers of victims of trafficking or sexual exploitation identified and supported through specialist services.
- Increase awareness through training and awareness raising of exploitation via online and social media
- Increased number of VAWG champions

How will we measure success?

- Number of Most Serious Violence offences per 1000 of the population
- Number of Gun Crimes
- Number of Knife Crimes
- Number of incidents of Violence with injury
- Number of Domestic Violence with Injury offences recorded by the Police (Colin, unless it was discussed at CPS, Police to confirm as Helen has not mentioned this to me and we don't receive detailed data reports anymore since cutbacks)
- Number of incidents of non-Domestic Violence with Injury (see comment above)
- Number of DV Murders recorded by the Police
- Number of Domestic Violence Offences recorded by the Police
- Number of Domestic incidents (non-crimes) recorded by the Police
- Percentage of total domestic reports to the Police that are recorded as offences versus percentage recorded as non-crime incidents (see comment above as the DVF don't receive this data)
- Domestic Violence Sanction Detection (SD) Rate
- Domestic Offence Arrest Rate (see comment above)
- Number of Rapes
- Rape Sanction Detection (SD) Rate
- Number of other Serious Sexual Offences
- Other Serious Sexual Offences Sanction Detection (SD) Rate
- Number of young people reported as missing from care or at risk of sexual exploitation, to Children's Services
- Number of cases referred to the MASE
- Number of service users presenting to sexual violence services in the borough
- Numbers referred to the MARAC
- Numbers of repeat referrals to the MARAC
- Number of women referred to the Prostitution MARAC
- Number of women re-referred to the Prostitution MARAC
- Number of women receiving de-infibulation services (for FGM) at Mile End Hospital
- Number of women who have undergone FGM reported to midwifery/sexual health services
- Numbers of people reporting HBV or FM (police and other partner data)
- Number of successful diversion from court outcomes for offences related to prostitution
- Number of test on arrest for drugs and alcohol when arrested for prostitution related offences
- Number of CRIS reports with flags for stalking or harassment
- Number of women and girls reported to the national referral mechanism for trafficking

- Numbers of trained VAWG Champions
- Training session delivered to capture exploitation and radicalisation

How will we do this?

- The Council will continue to develop partnership working with the Police, Health and the Voluntary Sector, to increase the reporting of domestic abuse The Police will work to the 'action plans' for Violence with Injury and Domestic Violence which are designed to drive forward performance.
- The Council Domestic Violence and Hate Crime team will drive the Domestic Violence Forum and its action plan, developing and coordinating services and undertaking training and awareness raising activities.
- The Council Domestic Violence and Hate Crime Team will deliver against the VAWG Action Plan, ensuring that specific partnership activity takes places against each of the VAWG strands above, coordinating services across the borough and coordinating training and awareness raising activities on VAWG issues.
- Development of services to tackle VAWG and support victims, including specific case management services.
- Working with the Prevent team to further develop training in regards to exploitation and extremism

Role of the Domestic Violence and Hate Crime Team in relation to Domestic Violence and VAWG

- Coordinating Domestic Homicide Reviews on behalf of the Council ensuring all partners are involved throughout the process.
- Running the Domestic Violence Forum, VAWG Steering Group and VAWG e-forum.
- Managing the Victim Support contract for Independent Domestic Violence Advisers and Violent Crime Caseworkers
- Co-ordinating The Tower Hamlets Multi Agency Risk Assessment Conference (MARAC): attended by key officers from the Police, Council and a range of other agencies. The MARAC meets fortnightly to share information and identify safety planning actions for agencies in high risk cases.
- Oversight, through the VAWG Steering Group of the prostitution work managed by the DIP, including the Police, and Tower Hamlets' Prostitution Partnership (THPP) meetings: interagency case meetings regarding sex workers
- Through the VAWG Steering Group, develop and oversee services to respond to all strands of VAWG
- Running the VAWG Champions Programme
- Running the Sanctuary Scheme to provide physical security measures in victim's homes.
- Servicing the Domestic Violence duty line providing advice and guidance to professionals and members of the public
- Receive and record DV1 referrals (inter-agency referral form) and maintain records of these through the borough's DV database
- Coordinate and manage the Partnership DV One Stop Shop

- Coordinate activities around White Ribbon Campaign
- Manage the Domestic Abuse, No Excuse Campaign ensuring key messages are communicated to all stakeholders.
- Hold DV Drop in surgeries including at the Barkantine and Homeless Person's Unit
- Coordinate the Specialist Domestic Violence Court for Tower Hamlets and Hackney
- Raise awareness and promote reporting amongst professionals and the public, in particular by providing training
- Coordinate and support the multi-agency forum on FGM
- Work with school staff, governors and parents, to enable young people to increase their awareness of VAWG and recognise when they are at risk
- Support agencies to identify and support people that are at risk of VAWG.

Violence with Injury

- Identification and Priority Cohort – the key trigger for diversion and engagement targeted support and enforcement measures will be based on intelligence about young people shared between key partners and stakeholders
- Young people (8-17 years) at risk of involvement in violent behaviour (including victims of Serious Youth Violence); those seeking a route out of violence and gang culture; and those being considered for enforcement measures due to refusing to exit violent lifestyles
- Referrals will continue to come from schools to the Social Inclusion Panel and support will extend to siblings of the target cohort as well as children of adult offenders via the Youth Inclusion Support Programme. The Youth Offending Prevention Service will build on its existing referral mechanisms for parents and self-referrals.
- Referrals from Royal London Hospital A&E and Trauma Wards
- We will also build on the Council's current arrangements for ASB enforcement measures and Gang Injunctions to ensure that young people have access to support services to prevent further escalation
- Support available includes education, training, employment, accommodation (Police – Safe and Secure Initiative), substance misuse services, parental support, violent offenders/identity workshops, mentoring and positive activities, health and emotional wellbeing services and having a named key-worker
- Early enforcement includes behaviour contracts (including exclusion zones and prohibitions), joint home visits and 'Buddi' monitoring tags.
- Civil enforcement includes Gang Injunctions, Parenting Orders, Civil Injunctions and Individual Support Orders
- The Integrated Youth and Community Service will work in partnership with the Police and respond to 'Youth on Youth Violence' issues and engage them into structured learning opportunities
- The Police will use a range of activities to tackle serious youth violence, this will include activity analysis, weapons sweeps and seizures, arrests, detections, search warrants, CHIS coverage and financial investigation
- Produce gang related intervention profiles (GRIPs) on each individual which will include information on and from Matrix analysis.
- Police will work to the 'action plans' for Violence with Injury and Domestic Violence which are designed to drive forward performance

What we will aim to achieve over the term of this plan?

- The Police will continue to work towards the MOPAC directive to achieve a 20% reduction in 'key crime' (Including Violence with Injury) by the end of 2015/16 performance year. (Police to comment on year?) The contribution to this performance through 2013/14 (Police to comment on year) will be a 5% Reduction in Violent Crime married with a 34% detection rate against the 2012/13 performance year. A focus on Violence with Injury offences and building on the success of Op Equinox the MPS Corporate Operation in the reduction of Violence with Injury (non DA).
- Increase victim satisfaction of cases heard at Specialist Domestic Violence Court
- Decrease unsuccessful prosecutions of domestic violence
- Increase awareness of all forms of VAWG and increase reporting to Police and other agencies
- Ensure recommendations from Domestic Homicide Reviews are considered at CSP
- Increase consistency of approach to addressing issues of domestic abuse across agencies, in particular by increasing the amount of training provided to professionals in front line services.
- Increase referrals to the MARAC and THPP, with a particular focus on all strands of VAWG.
- Develop specialist services for victims/ survivors of each VAWG strand.
- Develop educational and training resources for professionals and schools on how to appropriately respond on cases of VAWG.
- Increase the safety and health of street based sex workers and reduce associated ASB.

Violence with Injury

- A focus on Violence with Injury offences and building on the success of Op Equinox the MPS Corporate Operation in the reduction of Violence with Injury (non DA).
- Reduce the length of time that individuals experience domestic abuse for before they report it.
- Increase awareness of domestic abuse and violence and increase reporting of domestic abuse to the Police.
- Increase awareness of all forms of VAWG and increase reporting to Police and other agencies
- Increase consistency of approach to addressing issues of domestic abuse across agencies, in particular by increasing the amount of training provided to professionals in front line services,.
- Increase referrals to the MARAC and THPP, with a particular focus on all strands of VAWG.
- Develop specialist services for victims/ survivors of each VAWG strand.
- Develop educational and training resources for professionals and schools on how to appropriately respond on cases of VAWG.
- Increase the safety and health of street based sex workers and reduce associated ASB.

Priority E

Prostitution

Why is it a priority?

Prostitution in the borough is a new standalone priority to the CSP as of April 2015, formerly covered by Violence Against Women and Girls and Anti-Social Behaviour. The CSP has taken the decision to separate this out of both existing priorities to ensure that the impact that Prostitution has on both those involved and the surrounding neighbourhoods is recognised and addressed as a priority.

Women who sex work often experience complex needs for support for drug and alcohol misuse as well as underlying health and wellbeing issues which need to be addressed to enable their safe exit.

For those in the neighbouring community affected by prostitution (whether street-based or off street locations including brothels), it is often seen as anti-social behaviour which is having a detrimental impact of their quality of life, either from witnessing the act or the waste products left afterwards, to harassment alarm and distress both the prostitute and those involved in prostitution cause.

Work carried out by the CSP to address prostitution and its causes will have a positive impact on the performance against other interrelated CSP Priorities of Anti-Social Behaviour, Drugs and Alcohol and Violence Against Women and Girls.

Responsible Board/CSP Sub-group:

Violence Against Women and Girls (VAWG) Steering Group - TBC

What will we aim to achieve this year?

- Development of multi-agency coordination and accountability for prostitution
- Women with 'red flag' indicators are supported to reduce their risk through an holistic support package provided by a dedicated case management service
- Women engaged in prostitution are offered holistic support across health, housing, education and criminal justice
- Agencies across Tower Hamlets feel supported to support women engaged in prostitution
- Residents are engaged in partnership work to reduce prostitution related ASB
- Men who buy sex are targeted with police actions including letters deterring them from Tower Hamlets

How will we measure success?

- Number of women referred to the Prostitution MARAC
- Number of women re-referred to the Prostitution MARAC

How will we do this?

- Support organisations to increase their referrals to the Prostitution MARAC, with a focus on 'high-risk' groups such as sex workers, those who are dependent on alcohol or drugs, carers and young people.
- Increase safety and health of street based sex workers as well as reducing associated ASB.
- Meaningful consultation with residents, especially those from 'hotspot' areas for prostitution

What we will aim to achieve over the term of this plan?

Not applicable due to this only being made a priority for the final year of this CSP Plan term 2015/16.

Priority F:

Hate Crime and Cohesion

Why is it a priority?

The Tower Hamlets Community Plan aims to make the borough a better place for everyone who lives and works here. The Borough's diversity is one of its greatest strengths with the richness, vibrancy and energy that our communities bring. As a partnership we are committed to build One Tower Hamlets, to tackle inequality, strengthen cohesion and build both community leadership and personal responsibility. Preventing extremism and people becoming involved in it, is fundamental to achieving One Tower Hamlets. Our partnership approach has developed over the past five years and enabled us to tackle complex and contentious issues during that time.

The borough is a diverse and tolerant place, where the vast majority of people treat each other with dignity and respect. Unfortunately there is a small minority of people who don't hold those same values and perpetuate hate. Hate crimes are committed on the grounds of prejudice against people who are different than the perpetrator in some way.

The experience of prejudice and hate isn't limited to one particular group. Hate crimes are committed against people of different:

- race
- religion/beliefs
- age
- disability
- sexuality
- refugee/asylum seeker
- gender identity
- and any other (actual or perceived) differences

The partnership agencies will work together to address all the above forms of hate, with specific activity targeting under reported, more prevalent or emerging types of hate crime being addressed through the relevant CSP Subgroups on a quarterly basis.

Responsible Board/CSP Sub-group:

No Place For Hate Forum (NPFHF)
Tension Monitoring Group (TMG)
Prevent Board

What will we aim to achieve this year?

No Place For Hate Forum (NPFHF)

The NPFHF is a partnership of statutory, voluntary and community organisations that join together in a zero tolerance approach to all forms (also known as strands) of hate. We know that for some people difference is a frightening thing. In difference, they see a threat and that

is when prejudice takes hold. Sometimes prejudice results in the abuse and violence that undermines the borough's proud tradition of diversity and tolerance.

The No Place for Hate Forum brings partners together to implement a co-ordinated response to challenging prejudice and hate with work arranged under the following key themes:

- Protect and Support Victims
- Hold Perpetrators Accountable
- Prevention, Awareness and Community Cohesion

In 2016/17 we will ensure that all victims of all forms of hate crime have access to appropriate protection and support by:-

- Continue to develop strategies to impact on all forms of hate and ensure that Tower Hamlets is a safe place for everyone.
- Increase the reporting to the Police of hate crimes and incidents across all strands, by building community confidence.
- Increase professional and community awareness of hate and its impact, through a wide range of education and awareness raising activities including targeted activity for each of the strands of hate.
- Deliver a range of initiatives at different points throughout the year that contribute to making the borough proud and tolerant of its diversity.
- Develop a local NPFH Champions Programme to encourage responsibility in tackling hate and promoting cohesion.
- Manage and coordinate the No Place for Hate Campaign including increasing sign up to the No Place for Hate Pledge.
- Increase the number of cases heard at the Hate Incidents Panel.
- Maintain and further develop the Third Party Reporting (TPR) Centres and recruit new organisations to become TPR centres.
- Victim Support to ensure that clients have face to face visits and provide telephone support to victims
- Victim Support to establish a support desk at Accident & Emergency department at the Royal London Hospital
- Police Community Safety Unit to offer specialist advice to frontline officers regarding hate crime
- Ensure that victims of disability hate crime receive appropriate response, referrals to key partners and representations at ward panel meetings
- Disability hate crime victims to be identified from the first point of contact with the Police
- Build a local database and recognise the needs of all victims / suspects of disability hate crime

To deter and hold perpetrators accountable by:

- Hold monthly multi-agency Hate Incident Panel which ensure co-ordinated responses to hate crime and incidents
- Inform Registered Housing Providers of the Hate Incident Panel and encourage referrals and participation
- The Police Community Safety Unit to reduce offending opportunities for hate crime
- Reduce exclusions and cyberbullying by producing a locally relevant mobile app to inform pupils about cyber safety and online conflict

To prevent hate through promoting awareness, encouraging reporting and building community cohesion across all communities by:

- Awareness raising campaign promoting clear messages that Tower Hamlets is no place for hate and promote a stronger stand against hate in the borough
- Deliver activities outreach work and activities during National Hate Crime Awareness Week
- Recruit, train and support 10 No Place for Hate Champions to cascade hate crime awareness activities and training in the communities
- Inform all Children's Centres, Hospitals and GP Surgeries of the No Place for Hate Pledge, inviting them to join and encourage referrals to the HIP
- Carryout community cohesion intergenerational work to break barriers, reduce crime and get along together
- Raise awareness of the International Day Against Homophobia, Biphobia and Transphobia – Hatred Hurts All Conference aimed at those who work with victims of hate crime
- Raise awareness of pathways for hate crime reporting with members of the LBTH LGBT Community Forum
- Gain insight into local people experience and promote good practice in challenging homophobia, biphobia and transphobia

Tension Monitoring Group (TMG)

The TMG acts as a network of key individuals who represent statutory, voluntary and community organisations in Tower Hamlets who respond in real time to critical incidents, to provide an effective emergency response.

In 2016/17 we aim to:

- Review the membership of the group in order to cover gaps and strengthen its impact in protecting local communities.
- Continue to respond to cohesion related issues in the borough in real time.
- Undertake meetings and events to consider specific threats to cohesion, in order to both increase our knowledge and identify how the borough can respond to reduce specific threats.
- Undertake research on specific threats and how they impact upon the local community.
- Develop a communication protocol to support members in regards to reporting incidents in the borough

How will we measure success?

- Overall Hate Crime rate (reported to the Police)
- Hate crime sanctioned detection (SD) rate
- Number of "Racist and Religious" offences (reported to the Police)
- Number of Islamophobic offences
- Number of Anti-Semitic offences
- Number of Homophobic offences

- Number of Disability hate crime offences
- Number of Transphobic hate crime offences
- Number of cases reviewed at the Hate Incidents Panel
- % of hate crime cases coming to the Hate Incidents Panel where formal action is taken
- Number of Organisational and Personal No Place for Hate Pledges signed

How will we do this?

No Place For Hate Forum

- The Hate Incident Panel (HIP) consists of key agencies who can respond to cases of hate crime. Agencies who are members include the Council's Domestic Violence and Hate Crime Team, Police, LBTH Legal Services, Housing Associations, Victim Support and LBTH Youth Services. The HIP will meet regularly to assign and review effective actions, share information and swiftly manage responses to high risk hate crimes and incidents. It will ensure that the cases it considers receive a co-ordinated and structured response, and that offenders are held accountable for their actions. The HIP will increase the percentage of hate crime cases reviewed at the Panel, where enforcement action is taken. Enforcement action could be action against a tenancy such as eviction, legal action such as an injunction, criminal justice action such as arresting/charging/prosecuting or civil enforcement such as the range of powers available to THEOs and ASB Case Investigators.
- Advice and guidance will be provided by the LBTH Domestic Violence and Hate Crime Team to a range of agencies, particularly Registered Social Landlords (RSLs), with the intention to bring about a more coordinated and consistent response to hate crimes and incidents. Through this work, we will increase the number of cases referred to the HIP by RSLs.
- The Police, supported by other partners will work to increase the Sanctioned Detection (SD) Rate for hate crime across all strands.
- We will promote the message that we will not tolerate hate, in particular to offenders, by taking enforcement action and promoting the actions that have been taken.
- Maintain and develop Third Party Reporting Centres
- Encourage reporting through raising the profile of the No Place for Hate Campaign and Pledge.

Tension Monitoring Group (TMG)

- The TMG will continue to meet quarterly with emergency meetings taking place if and when needed to discuss imminent threats to cohesion. The group will also review its membership to ensure that all sections of the community are being engaged and are part of the discussion on cohesion related issues. Terms of reference will be updated along with a communication protocol to support the reporting of any incidents that may create a risk to community cohesion.

What we will aim to achieve over the term of this plan?

No Place For Hate Forum

- We will maintain and further develop the Third Party Reporting Project We will provide training and support to new and existing centres, including a TPR Steering Group. We will publicise the locations and contact details of TPR centres widely.
- No Place For Hate Campaign – we will continue the campaign which promotes an established clear message to the community. The campaign will be used to link to and support national and international campaigns as well as local events, highlighting clearly that the borough will not tolerate hate in any form in our diverse and cohesive borough, that is 'One Tower Hamlets'.
- The Forum will continue to promote the No Place for Hate Pledge, including at having stalls or other presence at events in the community, and through workshops and training. It will encourage as many individuals and organisations as possible to make a pledge against hate.
- The Forum aspires to increase the sign up of individuals and organisations to the pledge by at least an additional 100 per year.

Tension Monitoring Group (TMG)

- Maintain its role in monitoring local tensions and responding to threats to cohesion that may arise
- Aims to ensure that we continue to increase, on an annual basis, the percentage of people who believe people from different backgrounds get on well together in their local area, as measured by the Annual Residents Survey.
- Tackle and counter negative media messages about the borough in relation to cohesion and tension related issues.

Priority G:

Killed or Seriously Injured (on our roads)

Why is it a priority?

Road safety is an issue that affects not only everyone in London, but nationally and globally. We all need to use roads to get around – to school, to work, to the doctor, to the shops, to the cinema etc. Most of us use the roads every day, as drivers, passengers, cyclists and pedestrians, and for many people driving is the main part of their job.

TfL's annual Health, Safety and Environment Report reveals that 3,018 people were killed or seriously injured across Greater London in 2012, up from 2,805 in 2011. Of that fatalities were down from 159 to 134 and included 69 pedestrians, 27 motorbike/scooter riders and 14 cyclists, down two on 2011. The cost to the community of the road collisions in 2012 was an extraordinary £2.26 billion.

This increase in recent years along with media attention, has led to increased concern around road safety across London. Cycling fatalities in Tower Hamlets in and around busy arterial roads have increased local concerns and are a major factor for this being made a priority for the Community Safety Partnership.

2014 TFL data shows that compared to 2013, the number of people killed or seriously injured was down seven percent; Pedestrians and car occupants killed or seriously injured fell by seven per cent and six per cent respectively to their lowest ever levels. The number of cyclists killed or seriously injured was down 12%, despite huge increases in the number of people cycling, the number of children killed or seriously injured fell to the lowest level recorded, down 11%. This means that child road deaths have been reduced from 18 in 2000 to three in 2014 (Source <https://tfl.gov.uk/info-for/media/press-releases/2015/june/mayor-takes-action-to-halve-road-casualties-by-2020>).

Responsible Board/CSP Subgroup:

Killed or Seriously Injured (KSI) Board

What will we aim to achieve this year?

- Deliver road safety education programmes in schools, colleges and to community groups in the borough
- Deliver educational 'Exchange Programme' to drivers of HGVs and cyclists
- Focus campaigns on discouraging drink and drug driving and using mobile phones whilst driving
- Focused enforcement around travelling public in respect to road signage such as traffic lights/cycle boxes/ two-stage right turn

- Speed Gun Activity - Community Speed Watch and operation using children from local primary schools to advise drivers of the dangers of excessive speed; deterrent/educational programme.
- Joint Emergency Response Awareness Days: Demonstration of response to Road Traffic Collision.
- In June 2016 a joint operation is planned with RTPC's 'Safer Cycle Unit'. This will include an 'Exchange Programme' where cyclists are given an opportunity to sit in a HGV to experience the 'blind spots' and the perspective of the driver. A collaborative approach will also be taken with LBTH, with the use of a mobile police station for KSI educational/enforcement days. A Community KSI event is also planned for later in the summer. This partnership initiative will see local policing units and RTPC working alongside the LFEP and the LAS to reconstruct the aftermath of an RTC, showcasing the work of the emergency services and highlighting the dangers of speeding and Drug/Drink driving.
- A joint KSI operation is also planned at Canary Wharf to be conducted in partnership with Canary Wharf security. 120,000 people pass through the estate on a daily basis and this will be an educational programme focused particularly on cyclists.
- Regular ANPR operations continue to take place by the borough's CT Engagement Team using vehicle based mobile ANPR cameras and the Council's static CCTV. These operations take place on the main access/egress routes and target commuters coming in and out of central London. RTPC continue to have dedicated officers deployed on Operation Safeway to raise the profile of cycle related road safety; especially on the numerous Cycle Super Highways situated across the borough.

How will we measure success?

Number of recorded Killed or Seriously Injured as recorded by TFL

How will we do this?

- By engaging young people in schools/colleges/universities on road safety
- By provision of information and road safety equipment
- Better identification of road safety issue hotspots through enhanced information sharing, improved data collection, recording and analysis
- Regular meetings between Police, Fire Brigade, Council, TFL, London Ambulance Service (LAS) and key partners (including local transport groups), to prioritise identified problems and task resources committed to the reduction of KSI
- Identify road layout issues and set in place environmental changes to reduce risk

What will we aim to do over the term of this plan?

Through enhanced Police and partnership activity, we will seek a minimum 20% reduction in line with the MOPAC Police and Crime Plan 2013-17.

Priority H:

Prevent

Why is it a priority?

Nationally the threat from terrorism remains high and East London has been categorised as a 'high risk' area by the Government. Although there are many different terrorist groups across the world, currently the greatest risk to national security comes from ISIS. Tower Hamlets as well as neighbouring boroughs have had a small number of people being charged under the Terrorism Act 2006. We feel that a strong leadership and active community participation is required to address the threat of people being radicalised and the risk of local people supporting terrorism.

For the Tower Hamlets Partnership, work to reduce extremism and prevent individuals becoming radicalised is fundamental to achieving One Tower Hamlets. Work on preventing violent extremism began in 2007, but our local approach developed out of existing partnerships, approaches and programmes which had enabled us to tackle complex and contentious issues in the past.

Underpinning our work has been a commitment to engaging with all communities, to listen to and address concerns and work with the community and statutory partners to develop appropriate interventions where necessary.

We recognised from the outset that we could not achieve our aims by working in isolation and have been committed throughout to strengthening accountability and transparency. Engaging and debating with our communities has been key to increasing our own understanding of the impact on residents of extremism and its links to violence.

Prevent is a Home Office led national strategy with local action plans vigorously reviewed and approved by them before any activity is commenced at a local level. Local Prevent Action Plans remain strictly confidential within only those agencies in attendance at the local Prevent Boards.

Responsible Board/CSP Subgroup:

Prevent Board

What will we aim to achieve this year?

- Target social, peer and educational support and advice to individuals identified as at risk of involvement in extremist activity and violence
- Strengthen community Leadership to enable key individuals and organisations to challenge extremist ideology

- Strengthen positive social networks and institutions to increase their capacity to challenge extremism and violence, and disrupt networks and organisations which are sympathetic to extremism and terrorism
- Ensure robust evaluation is built into the delivery of the Prevent programme and activities to ensure effective monitoring of impact and increased capacity of local organisations to deliver Prevent objectives
- Mainstream Prevent across all Directorates in order to increase Prevent awareness and enhance referrals for those that are vulnerable to extremism.
- Support capacity building with local organisations and providers to support the delivery of Prevent and the safeguarding agenda locally.
- Ensure corporate Safeguarding Policy includes Prevent as a key strand.
- Ensure that WRAP training is provided to a broad range of organisations, across front line operational teams to community organisations and through to Cllrs and executive members of the Council.
- The delivery of Home Office funded projects which are community based.
- Continue with the parental engagement project and working with VAWG led for joint training and awareness session

How will we measure success?

- Number of Prevent Board Meetings per year
- Number of referrals to Social Inclusion Panel (under 18 years of age)
- Number of referrals to Safeguarding Adults Board (over 18 years of age)
- Number of training sessions delivered per year (including categories of those trained)
- Number of individuals trained per year (including categories of those trained)

How will we do this?

- The Prevent Action Plan is currently being developed awaiting confirmation of Home Office funded projects for 2016-17. (April 2016) Once completed this will be shared with the Prevent Board to be signed off. In year action plans remain a confidential document for the Prevent Board to only as stipulated by the Home Office
- The Partnership and Prevent Team within the Council and Police officers will work with Home Office approved service providers to engage those at risk of involvement in extremism and violence and strengthen community leadership and resilience against it.
- Quarterly monitoring data in regards to the projects provide an update on activity and challenges. Updates on performance are shared at the bi monthly Prevent Board.
- Both the Social Inclusion Panel and Safeguarding Adults Panel lead on referrals regarding Prevent and will continue to lead on this and again share information at the Prevent Board and CSP Board each quarter.
- Each quarter the training that is delivered both through the Community Engagement post and also the Prevent Curriculum Advisor post are reported to the Home Office and an update provided to the Prevent Board and CSP Board.

Cross-Cutting Priorities

When the Strategic Assessment and Public Consultation findings were presented to the Community Safety Partnership, they recognised that there were a number of areas of work that cut across other priority areas. Action taken to address the stand-alone priorities would be impacted by and impact upon these cross-cutting areas. For this reason the Community Safety Partnership agreed that this Plan would also contain the following cross-cutting priorities:

Public Confidence & Victim Satisfaction

Reducing Re-offending

MOPAC 7

Cross-Cutting Priority 1:

Public Confidence & Victim Satisfaction

Why is it a priority?

Public Confidence is a Government priority and a measurement of the level of Confidence in Policing and the wider partnership. Reducing the community's fear of crime is therefore a priority as how we deal with crime, disorder and anti-social behaviour impacts on the community's well-being, confidence to report incidents and support of future investigations and prosecutions.

The perception of, and fear of both crime and ASB directly impacts on public confidence. Being a victim of or knowing a victim of a Serious Acquisitive Crime (robbery, burglary, car crime and theft), has a particular impact on public confidence and can generate negative perceptions of both agencies and particular geographical areas or estates in the borough.

Responsible Board/CSP Sub-group:

Confidence and Satisfaction Board

What will we aim to achieve this year?

- Ensure that residents and people who work in or visit the borough, have a realistic understanding of the levels of crime and disorder within the borough, so that their fear does not become disproportionate
- Encourage people to take reasonable steps to protect themselves, their neighbours and their property
- Ensure that people continue to report crime, disorder and anti-social behaviour to the relevant agencies and that they are confident their issues will be dealt with
- Reduce the level of reported ASB and Crime, including Serious Acquisitive Crime, which are known drivers of public confidence
- Improve the public's perception of police by 20% and improve satisfaction with the policing service provided

How will we measure success?

- % of residents who feel the Police deal effectively with local concerns about anti-social behaviour and crime
- Perceptions of Crime and ASB as measured by MPS and Council data reduced based on 2012/13 end of year performance data.
 - Local concern about ASB and Crime a) Drunk and rowdy behaviour in a public place
 - Local concern about ASB and Crime b) Vandalism and Graffiti

- Local concern about ASB and Crime c) Drug use or drug dealing as a problem
- Local council and police are dealing effectively with local concerns about anti-social behaviour and crime
- Year on year improvement in published performance data relating to Confidence and Satisfaction measures

How will we do this?

- Continue and improve partnership working to provide a quality response to all victim needs and identified crime trends.
- Respond to every victim's call for help by responding in a timely fashion while delivering a quality service.
- Contact every victim of ASB to establish how we can support them better, to improve theirs and their community's quality of life.
- Contact a range of victims of crime to identify the level of service delivered and identify opportunities to improve service delivery.
- Improve our communication of good news 'you said, we did'

What we will aim to achieve over the term of this plan?

- 20% Increase in Public Confidence
- Reduce the Volume of Reported Crime and ASB each year from a baseline measured on 2012/13 financial year.
- Improve our Confidence and Satisfaction Performance data by 2 percentage points per year based on 2012/13 financial year.
- Through better contact with victims, we will improve victim care and increase our Public Confidence and Satisfaction performance that will contribute together with other activity to show Tower Hamlets as the 'best in class' within inner London.

Cross-Cutting Priority 2:

Reducing Re-offending

Why is it a priority?

Partners in Tower Hamlets are committed to working together to reduce crime and disorder, and tackling deprivation, worklessness and social exclusion. We know that 50% of all crime is committed by people who have already been through the criminal justice system – re-conviction rates for some offenders can reach over 70%.

IOM: In Tower Hamlets, like most boroughs there are a relatively small number of people who carry out the majority of criminal acts. By targeting resources at these prolific offenders, to improve the level of support provided for those who wish to change their lives in a positive way and fast-tracking the prosecution process for those who refuse to change, we aim to reduce the number of prolific offenders in the borough and make it a safer environment for everyone.

MAPPA: Persons who are subject to MAPPA oversight are by their very nature some of the most dangerous offenders living in our community. Public safety is critical and it is also essential that MAPPA subjects are provided with the opportunity and cause to stop offending, through various mechanisms including rehabilitative interventions.

GANGS: Gang violence remains an issue for the borough; Tower Hamlets has a high number of young people involved with gangs with offences such as robbery and violence being committed. During 2015/16 over 150 knives were recovered - from people carrying them in public places, from weapons sweeps and also from test purchase operations. The number of knife crime victims under 25 is a concern for the CSP.

Responsible Board/CSP Sub-group:

Reducing Re-offending Board (RRB)
Youth Offending Team (YOT) Management Board

What will we aim to achieve this year?

- Reduce the level of recorded crime within the borough
- Reduce the level of the 'Gang Indicator crimes' within the borough
- Ensure there is adequate provision (e.g. housing and ETE) so that prolific and/or dangerous offenders can be rehabilitated and the public protected
- Work with partners to identify a common approach to the use of Criminal Behaviour Orders
- Develop a Youth IAG and Young Advisors programme to ensure young people have a voice and that they can help influence the partnership approach to these and other challenges

How will we measure success?

Young People

- Number of Youths not entering Criminal Justice System through YOS EIP
- Proven reduced re-offending by offenders supported by Youth Offending Service

Gangs

Gang Indicator crimes –

- Serious Violence
- Violence With Injury
- Knife crime
- Knife injury
- Gun crime
- Gun discharges
- SYV victims
- Knife Injury victims under 25 no DA related

IOM

- No. of red and amber offenders with a 'need' versus the no. where the need has been met. The “need” categories are: Accommodation, ETE, Mental Health, Substance Misuse & Benefits

MAPPA

- No. of L2 / L3 offenders with an accommodation need v no. of offenders with that need met
- No. of L3 offenders committing a serious offence within the period of supervision
- No. of L3 offenders committing a serious offence within 28 days after the end of the period of supervision

How will we do this?

- Better identify youths who are suitable for non-Criminal Justice outcomes by improved triage processes and introduce conditional cautioning as a disposal option.
- Improve drug testing activity in Police custody, to identify potential offenders and provide support / treatment
- Improve partnership engagement to better identify third sector agencies that can support identified offenders who require help to escape their life of crime.
- Secure additional housing and/or other services such as ETE, to meet the needs of the offenders

- Enhance our daily contact with named individuals through the Integrated Offender Management Team (Police, Probation and Drug Intervention Project), to ensure their ongoing commitment to a non-criminal lifestyle
- Use of the YJB Re-offending toolkit which enables management to target resources to those groups committing the most re-offending, using live data.

Cross-Cutting Priority 3

MOPAC 7

Why is it a Priority?

The Mayor's Office for Policing and Crime (MOPAC) under their remit as Police and Crime Commissioner for London have produced their 3 year Police and Crime Plan. Within their plan are 7 reduction targets relating to key neighbourhood crimes, which in total MOPAC have set a target for the Metropolitan Police Service to reduce by 20% by the end of March 2016.

Using the financial year of 2011/12 as a baseline, each London Borough Police have been set individual targets against each of the 7 key crimes to obtain an overall 20% reduction. These individual reduction targets have been reviewed and set annually based on each financial year's performance during the 3 year term of the Police and Crime Plan.

Tower Hamlets Community Safety Partnership Plan is aligned to the London Police and Crime Plan both in terms of MOPAC 7 priorities and length of term.

Responsible Board/CSP Sub-group:

Tactical Tasking and Co-ordinating Group (TTCG)

What will we aim to achieve this year?

- Reduction in the total number of MOPAC 7 basket offences/crimes
- Reduction in the total number of Burglaries
- Reduction in Criminal Damage
- Reduction in Robbery
- Reduction in Theft from Motor Vehicle
- Reduction in Theft/Taking of Motor Vehicle
- Reduction in Theft from Person
- Reduction in Violence with Injury

How will we measure success?

- Number of MOPAC 7 basket offences/crimes
- Number of Burglaries
- Number of incidents of Criminal Damage
- Number of Robberies
- Number of Thefts from Motor Vehicles
- Number of Theft/Taking of Motor Vehicles
- Number of Thefts from Person
- Number of incidents of Violence with Injury

How will we do this?

Integrated offender management and targeted work around prolific and priority offenders is key to reducing these types of crimes. Working in partnership, agencies such as the Police, Probation, drug treatment services and the Council can manage these offenders by providing a range of interventions from treatment and support which seek to address the causes, to criminal justice interventions such as the courts.

Violence with Injury

- Identification and Priority Cohort – the key trigger for diversion and engagement targeted support and enforcement measures will be based on intelligence about young people shared between key partners and stakeholders
- Young people (8-17 years) at risk of involvement in violent behaviour (including victims of Serious Youth Violence); those seeking a route out of violence and gang culture; and those being considered for enforcement measures due to refusing to exit violent lifestyles
- Referrals will continue to come from schools to the Social Inclusion Panel and support will extend to siblings of the target cohort as well as children of adult offenders via the Youth Inclusion Support Programme. The Youth Offending Prevention Service will build on its existing referral mechanisms for parents and self-referrals.
- Referrals from Royal London Hospital A&E and Trauma Wards
- We will also build on the Council's current arrangements for ASB enforcement measures and Gang Injunctions to ensure that young people have access to support services to prevent further escalation
- Support available includes education, training, employment, accommodation (Police – Safe and Secure Initiative), substance misuse services, parental support, violent offenders/identity workshops, mentoring and positive activities, health and emotional wellbeing services and having a named key-worker
- Early enforcement includes behaviour contracts (including exclusion zones and prohibitions), joint home visits and 'Buddi' monitoring tags.
- Civil enforcement includes Gang Injunctions, Parenting Orders, Civil Injunctions and Individual Support Orders
- The Integrated Youth and Community Service will work in partnership with the Police and respond to 'Youth on Youth Violence' issues and engage them into structured learning opportunities
- The Police will use a range of activities to tackle serious youth violence, this will include activity analysis, weapons sweeps and seizures, arrests, detections, search warrants, CHIS coverage and financial investigation
- Produce gang related intervention profiles (GRIPs) on each individual which will include information on and from Matrix analysis.
- Police will work to the 'action plans' for Violence with Injury and Domestic Violence which are designed to drive forward performance

Robbery and Theft from Person

- Areas of high risk need will need to be identified through the TTCG process and staff allocated as required, a conscious decision needs to be made between Local Authority and Police as to where their limited resources are best deployed at a given time
- Additional support and training needs to be given to teachers and those that have the closest interactions with youth in order to educate them on personal safety.
- Raise awareness on personal safety when exiting transport hubs and being aware of their property

Burglary

- Landlords, Local Authority and Police to work closer together to reduce the number of properties/areas that are attractive to burglars, as offenders will look for the easiest option for the highest yield with the lowest risk of being detected.
- Address common themes and remind owners to take simple steps to protect their property, like securing windows and doors
- Work with developers to design out crime during the planning stages of new residential developments
- Work in partnership with Queen Mary University to educate students, target harden dorms and reduce burglaries/thefts from both student accommodation and campus
- Work with schools officers to engage with schools about crime prevention tactics
- Partnership working with businesses to reduce the amount of thefts from business premises, including use of key fob entry systems and designing out crime opportunities

Vehicle Crime

- Increase education of owners of particular motor cycles/mopeds to ensure increased security of these high risk vehicles
- Signage in high crime hotspots to educate owners to secure and protect their vehicles
- Use publicity to address emerging trends in types of vehicle being targeted to prevent further offences
- Increase education of owners/drivers and in particular non-resident parking area users to ensure they take steps to reduce risk and secure both vehicle and contents
- Deter drivers from leaving valuables on display for opportunist crimes

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APPENDIX 2 – Equalities Considerations

The Community Safety Plan 2013-16 is informed by both the Strategic Assessment 2012 and annual Strategic Assessments within its term, which analyses data on the trends and future local challenges, and through consultation with both members of the public and the wide membership of the Community Safety Partnership (Safe and Cohesive Community Plan Delivery Group). A number of cross cutting issues were also considered as part of this process.

From this detailed evaluation of the strategic landscape and assessment of the most effective governance arrangements, priority areas were developed. This included consideration of the drivers of crime locally and equalities - through the impact on people from different protected characteristic groups. This has influenced the identification of the Plan's priorities for 2013-16, which are:

- Gangs and Serious Youth Violence
- Anti-Social Behaviour (including Arson)
- Drugs and Alcohol
- Violence (inc. Domestic Violence and Violence Against Women and Girls)
- Prostitution
- Hate Crime and Cohesion
- Killed or Seriously Injured
- Property / Serious Acquisitive Crime

Cross-cutting Priorities:

- Public Confidence
- Reducing Re-offending
- MOPAC 7

A high level test of relevance equalities screening has been undertaken on the Plan. This is attached as appendix 2. As the Plan is to be further developed through Community Safety Partnership (CSP) subgroup action plans – further detailed evaluation of equalities in the action plans will be undertaken by those subgroups to ensure they continue to be considered with the development of the Plan.

The Plan is a jointly owned partnership approach – it is not solely owned by the Council – so the authority will communicate the importance of ensuring subgroups give 'due regard' to equalities in the action plan development process and are aware of the requirement to provide appropriate evidence: These considerations will be recorded through the inclusion of equalities considerations in the template for creating their action plans. As sub-group action plans are presented to the Community Safety Partnership (Safe and Cohesive CPDG) equalities considerations will be evaluated by the members.

APPENDIX 3 - Equalities Analysis - Initial Screening Document

This document is to be used for:-

- Establishing whether an Equality Analysis needs to be undertaken for the policy, function or strategy. *(Based on Section 4 around Impacts)*
- Reviewing existing equality analysis (EQIA) to ascertain whether the original EQIA needs revising.

Section 1 – General Information

Name of the Policy or Function
Community Safety Partnership Plan 2013-16

Service area
Safer Communities Service

Team name
The Community Safety Partnership

Service manager
Emily Fieran-Reed

Name and role of the officer completing the Initial Screening
(Explain why these people were selected i.e. the knowledge and experience they bring to the process)
Colin Hewitt – CSP Officer, Community Safety

Section 2 - Information about the Policy or Function

Is this a policy or function? Policy Function

Is the policy or function strategic or developmental?

Strategic Developmental

Is this a new or existing policy or function? New Existing

If for a new policy or function, please indicate the date this form was undertaken
April 2013

If for an existing policy or function, what was the original date(s) the equality analysis (Initial Screening or EQIA) was undertaken
(please attach a copy of any previous equality analysis)

What are the main aims and objectives of the Policy or Function

There is a legal requirement for each Community Safety Partnership formerly Crime and Disorder Reduction Partnership (Safe & Cohesive CPDG) to have a Community Safety Plan.

The Safe and Cohesive Plan 2013-2016 has been created in consultation with members of the Safe & Cohesive CPDG. The objective of the Plan is to address the following local priorities:

- Gangs and Serious Youth Violence
- Anti-Social Behaviour and Arson
- Drugs and Alcohol
- Violence (inc. Domestic Violence and Violence Against Women and Girls)
- Prostitution
- Hate Crime and Cohesion
- Killed or Seriously Injured
- Property/Serious Acquisitive Crime

Cross-cutting Priorities:

- Public Confidence
- Reducing Re-offending
- MOPAC 7

Who are the main stakeholders:

The London Borough of Tower Hamlets

The Police

London Fire Brigade

Probation Services

Health, NHS, CCG and Public Health

Those who live, work, study and visit the borough

Is this policy/function associated with any other policy or function of the Council
(i.e. *Community Plan, One Tower Hamlets etc.*)

- The Community Plan
- Children and Young People's Plan
- Substance Misuse Strategy 2011-2014 (Drugs & Alcohol)
- Violence Against Women and Girls Strategy
- Integrated Offender Management Plan
- Tower Hamlets Prevent Delivery Plan (under review in line with National Guidance)
- ASB Profile
- Hate Crime Strategy
- Community Cohesion Contingency Plan

Section 3 – Information about Existing Policies and, or Changes to Functions only

Has there been any 'significant' change to the Policy or Function?

Yes No

If yes, Please indicate what the change will be and what has brought about this change to the policy or function?

has been NO SIGNIFICANT amendments to an existing policy/function there is no need to continue to Section 4 below or a full equalities analysis

Section 4 – The Impact

(Briefly assess the potential impact that the policy/function could have on each of the target groups. The potential impact could be negative, positive or neutral. If you have assessed negative potential impact for any of the target groups you will need to also assess whether that negative potential impact is high, medium or low). Please also indicate if there is any link to Community Cohesion.

Identify the potential impact on the following groups and:

Target Groups What impact will the 'new' or 'significantly' amended policy or function have on specific groups of service users?	Impact – Positive or Adverse	Reason(s) <ul style="list-style-type: none"> • Please add a narrative to justify your claims around impacts and, • Please describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making • Can the negative impact be justified on the grounds of promoting equality?
Race Page 199	Positive	<p>For race equality the priority of addressing Hate Crime and Cohesion may be of particular relevance.</p> <p>The data collected in the CSP Strategic Assessment 2012 suggests that depending on your racial background, the likelihood of you being a victim of crime or identified as a perpetrator of crime varies significantly. The analysis below summarises this information and sets out key areas which will be addressed by sub-groups in developing detailed plans to reduce crime, protect victims and promote equality for people from different racial backgrounds.</p> <p>National crime data</p> <p>There is a significant amount of national and regional evidence about the different experiences of crime by people from different racial background, some of which is summarised below. These suggest possible areas of inequality locally. In developing the CSPP sub-group action plans we will seek to collect and analyse local data to identify patterns in the borough:</p> <p>Overall crime: Analysis from the Ministry of Justice's Statistics on Race and the Criminal Justice System 2010 and according to the 2010/11 British Crime Survey, showed that nationally the risk of being a victim of personal crime was higher for adults from a Mixed background than for other ethnic</p>

groups. It was also higher for members of all BME groups than for the White group. Over the five year period 2006/7 to 2010/11, there was a statistically significant fall in the risk of being a victim of personal crime for members of the White group of 0.8%. The apparent decrease for those from BME groups was not statistically significant.

Violent crime: Of the 2,007 homicides nation-wide recorded between 2007/8 and 2009/10, 75% of victims were White, 12% Black and 8% Asian. These proportions are lower for the white group and higher for the Black and Asian groups than reflected in estimates of the general population. In the majority of homicide cases, victims were suspected of being killed by someone of the same ethnic group, which is consistent with the previous trend (88% of White victims, 78% of Black victims and 60% of Asian victims).

Arrest and sanction rates: Across England and Wales, there was a 3% decrease in the total number of arrests in 2009/10 (1,386,030) compared to 2005/6 (1,429,785). The number of arrests for the White group also decreased during this period, arrests of Black persons rose by 5% and arrests of Asian people by 13%. Overall, there were more arrests per 1,000 population of each BME group (except for Chinese or Other) than for people of White ethnicity in 2009/10. Per 1,000 population, Black persons were arrested 3.3 times more than White people and those from Mixed ethnic group 2.3 times more than White people.

Conviction ratios for indictable offences were higher for White persons in 2010 than those in the Black and Asian groups (81% for White, 74% for Black and 77% for Asian). A higher percentage of those in the BME groups were sentenced to immediate custody for indictable offences than in the White group in 2010 (White 23%, Black 27%, Asian 29% and Other 42%), this is mainly due to differences in plea between ethnic groups.

Regional crime data:

Analysis from the MOPAC Policing and Crime Plan 2013-17 Equality Impact Assessment 2013 states that London is disproportionately affected by crime problems, such as robbery and knife crime, typically associated with young males who often operate in groups or 'gangs'. Current analysis shows that all of the gang members scored on the MPS matrix are male and that 79% are described as Black and Minority Ethnic (BME). In 2011 14% of homicides (19) were gang related and two thirds (12) were teenagers and all but one was male and from a BME background.

Hate crime: Analysis from the MOPAC Policing and Crime Plan 2013-17 Equality Impact Assessment 2013 states that hate crime is greatly unreported and which is a great concern for many communities. In 2011/12 there was a 6.8% reduction in the number of reported racist and religious hate crimes.

Analysis by the Home Office shows that there were 43,748 hate crimes recorded by the police in 2011/12 in England and Wales, of which 35,816 (82%) were race hate crimes

The number of Racially motivated crimes/incident recorded by the Police in 2010/11 was 18% lower at 51,187, than they were during the 5 year period 2006/7 to 2010/11.

Local data

Analysis from the CSP Strategic Assessment 2012 under Cohesion & Hate Crime indicator recording the number of racist and religious offences showed a 9% decrease (34 less) in the number of offences in the year up to September 2012, when compared to the previous year. Offence numbers have remained reasonable static for the last 3 years, with an average of 358 offences a year, or one a day.

Recommendations from CSP Strategic Assessment to CSP and Subgroups were that their action plans should maintain a continued focus on all Hate Crime Offences of which Racist and Religious Offences fall into. The CSP and its Subgroups to continue their work around education of potential victims and suspects within this crime category and to carry on with various education/crime prevention plans linked to this subject.

Analysis from the CSP Strategic Assessment 2012 provided by the Metropolitan Police to Victim Support regarding victims of crime by ethnicity and age is not thorough and reliant on the information recorded on the Police CRIS system. However combined figures for segmented groups into large groups (Asian, White, Black, Other) shows that during the period 1st October 2011 to 30th September 2012, 45% of victims of crime were from the White group, 35% from the Asian group and 9% from the Black group. Population figures for Tower Hamlets from the 2011 Census shows 45% from the White group, 41% from the Asian Group and 7% from the Black group. Therefore the Asian group is underrepresented by 6 percentage points and the Black group is over represented by 2 percentage points.

Looking at crime breakdown by ethnicity White people are over represented in the borough being victims to 60% of burglary and 50% of robbery, when compared to the population figure of 45%. Black people are over represented in the borough being victims to 12% of violent crime, when compared to

		<p>the population figure of 7%.</p> <p>Recommendation from Victim Support in the CSP Strategic Assessment 2012 is for the Metropolitan Police to improve the recording of specific hate crime categories which will improve the referrals to Victim Support via the automatic data transfer from the Police CRIS system. More accurate recording of ethnicity of victims will enable Victim Support to analyse trends in crimes for the borough and assist in targeted work for CSP Subgroups to deliver.</p>
Disability	Positive	<p>For disability equality, the priority of addressing Hate Crime and Cohesion may be of particular relevance.</p> <p><u>National and regional data</u></p> <p>Analysis by the Home Office shows that there were 43,748 hate crimes recorded by the police in 2011/12 in England and Wales, of which 1,744 (4%) were disability hate crimes</p> <p>Analysis of regional police force figures show that there were 133 disability hate crimes recorded by the Metropolitan Police Force in 2011. This demonstrates a 14.66% increase on the number of recorded disability hate crimes in 2010 (116) and a 34% increase when compared to the ACPO figures for London in 2009 (99).</p> <p>Analysis in the British Crime Survey 2010/11 shows that Disabled people are significantly more likely to be victims of crime than non-disabled people. This gap is largest amongst 16-34 year-olds where 39 per cent of disabled people reported having been a victim of crime compared to 28 per cent of non-disabled people. Disabled people are less likely than their non-disabled peers to think the Criminal Justice System (CJS) is fair. This gap is largest amongst 16-34 year-olds, where 54 per cent of disabled people think that the CJS is fair compared to 66 per cent of non-disabled people</p> <p>Analysis from the MOPAC Policing and Crime Plan 2013-17 Equality Impact Assessment 2013 states that hate crime is greatly unreported and which is a great concern for many communities. There is significant underreporting of disability hate crimes (according to the Met's 2011/12 Annual Report).</p> <p><u>Local data:</u></p> <p>Analysis from the Tower Hamlets Local Voices report (Hearing the Voices of Disabled People in Tower Hamlets) produced by REAL in 2013, of which 99 disabled people responded to the survey showed that the number one issue for 12% of the survey respondents and number 2 issue for 9.1% of</p>

		<p>the respondents was Crime and Safety. Older people, Asian people and those with a Mental Health condition has slightly higher levels of concern and a greater sense that crime and safety services were failing disabled people than others. Nearly half of the survey respondents disagreed/strongly disagreed that disabled people were safe from harassment and hate crime and only 30% agreed they were safe. Within each gender, age and ethnicity groups of those disabled people who completed the survey, it was Men, people under 60 and Asian people who most tended not to agree that disabled people were safe. Amongst different impairment groups, disagreement was particularly high for people with visual impairment (55%), people with learning disability or cognitive impairment (80%) and people with mental health condition (87%). Overall 28% of survey respondents believed crime and safety services did not serve disabled people well, making it fourth worst performing service out of the survey. People with visual impairment were particularly critical, with 25% saying it fails disabled people.</p> <p>Response - In line with the equalities duty and the No Place For Hate & Domestic Violence action plan, The Domestic Violence & Hate Crime Team are committed to supporting both agencies and disabled service users in the context of all crime and disorder.</p> <p>The DV & Hate Crime Team currently provide monthly training to service users who experience mental health illness & learning disabilities around recognising what domestic violence and hate crime is, which also shows them how they can report incidents. We have recently produced an 'easy read' DV leaflet for adults with learning disabilities and will have finished an easy read HC leaflet by November 2013. The team also provide regular training to the Community Mental Health Team, Safeguarding Adults Board, Safeguarding Adults Champions and local community groups including REAL, Positive East and MIND.</p>
Gender	Positive	<p>For gender equality, the priority of addressing Violence (with a focus on Domestic Violence) may be of particular relevance.</p> <p><u>National and regional data</u> Analysis from the Ministry of Justice's Statistics on Women and the Criminal Justice System 2012, shows an estimated three in every 100 adults were a victim of violent crime according to the Crime Survey England and Wales 2011/12, with 2% of women reporting being victims of violent crime compared to 4% of men. The type of violence most commonly reported differs by gender. Women who reported being a victim of violence were most commonly victimized by an acquaintance whereas men</p>

most commonly were victims of stranger violence.

A higher proportion of women reported being victims of intimate violence such as partner or family non-physical abuse, threats sexual assault or stalking - 7% of women compared with 5% of men.

201 women were victims of homicide in 2010/11 compared with 435 men according to data from the Homicide Index. A greater proportion of female victims than male victims knew the principal suspect, 78% and 57% respectively in 2011.

34% of females and 31% of males were arrested for violence against the person in 2010/11 - the most common offence group for arrest during the five year period 2006/7 to 2010/11.

According to the Ministry of Justice figures for 2010/11 by Police Force area, the Metropolitan Police arrested 50,293 men and 9,464 women that year for Violence Against the Person. The next highest was 28,207 arrests of men and 8,471 arrests of women for Theft and Handling, followed by 20,980 arrests of men and 1,894 arrests of women for Drug Offences.

Nationally more than 1.2m persons of known gender were convicted and sentenced at all courts in 2011. Of these 24% were female and 76% were male.

Analysis from the MOPAC Policing and Crime Plan 2013-17 Equality Impact Assessment 2013 states that London is disproportionately affected by crime problems, such as robbery and knife crime, typically associated with young males who often operate in groups or 'gangs'. Current analysis shows that all of the gang members scored on the MPS matrix are male. In 2011 14% of homicides (19) were gang related and two thirds (12) were teenagers and all but one was male.

Local data

Analysis from the CSP Strategic Assessment 2012 under Violent Crime Indicator for the 'Number of Most Serious Violence offences per 1,000 of the population' and 'Number of Assault with Injury' show that victims are more likely to be male although repeat victims are more likely to be female. Currently (October 2013) Non Domestic Violence with Injury accounts for 68% and Domestic Violence With Injury accounts for 32% of all Violence with Injury in the borough. In the town centre hotspot, victims and suspects are less likely to know each other. When they do know each other they are more likely to be acquaintances, whereas on the rest of the borough, they are more likely to have been in a past or current relationship with each other (domestic violence).

		<p>Recommendations from CSP Strategic Assessment to CSP and Subgroups was that their action plan should include a continued focus on Violence Related Offences, the Community Safety Partnership to continue its work around education of potential victims and suspects within this crime category. Carry on with various education plans linked to this subject and continue crime prevention programmes. The subgroup responsible for the CSP Priority Violence (with a focus on Domestic Violence) action plan should contain detailed actions to address these findings, which should lead to a decrease in the number of offences and an increase in partnership working, social cohesion and education around this subject.</p> <p>Analysis from the CSP Strategic Assessment 2012 under Violence Against women and Girls, measures the number of Domestic Violence Offences shows an increase in the number of offences by 6% year on year over the three year period. This increase could be down to a number of factors including numbers of people living in the borough, overcrowding and the economic downturn, particularly the associated pressures that these can bring, but also may be down to an increase in confidence to report offences. A lot of work has been done in the borough to raise awareness of domestic violence, specifically Violence Against Women and Girls as it has been both nationally and locally grossly under reported. The Crime Survey for England and Wales estimates that since the age of 16, 29% of Women have experienced Domestic Violence; 20% have experience Sexual Assault and 19% have experienced Stalking. Approximately 97% of all known victims of interpersonal violence in Tower Hamlets are Female, which is a significant gender bias towards Women.</p> <p>Recommendations from CSP Strategic Assessment to CSP and Subgroups were that their action plan should include a continued focus on all violence related offences, especially those that can be linked to Domestic Violence. The CSP and Subgroups should continue to work and focus around education of potential victims and engaging with suspects within this crime category. Carry on with various education plans linked to this subject and continue with gender specific crime prevention programmes.</p>
Gender Reassignment	Positive	<p>For transgender equality, the priority of addressing Hate Crime and Cohesion may be of particular relevance, as this priority aims to address all hate crimes, of which trans phobic crime is one.</p> <p>Analysis by the Home Office shows that there were 43,748 hate crimes recorded by the police in 2011/12 in England and Wales, of which 315 (1%) were transgender hate crimes.</p> <p>In 2013 Galup's hate crime report stated that there were only 50 transphobic crimes recorded in</p>

		<p>London during 2012/13, yet anecdotal evidence collected by Galup identifies individual trans people who are the target of over 50 transphobic crimes each year.</p> <p>We do not have any local or borough data to analyse as there were no recorded trans phobic crimes in last year according the local Police data.</p>
Sexual Orientation	Positive	<p>For Lesbian, Gay and Bisexual people, the priority of addressing Hate Crime and Cohesion may be of particular relevance.</p> <p><u>National and regional data</u> Analysis by the Home Office shows that there were 43,748 hate crimes recorded by the police in 2011/12 in England and Wales, of which 4,252 (10%) were sexual orientation hate crimes.</p> <p>Analysis from the MOPAC Policing and Crime Plan 2013-17 Equality Impact Assessment 2013 states that hate crime is greatly unreported and which is a great concern for many communities. In 2011/12 there was a 5.5% reduction in the number of reported homophobic crimes.</p> <p>A report on homophobic crime produced by the Equality and Human Rights Commission shows that LGB people appear to worry about being the victim of crime to a greater degree than other minority groups. In 2008 around 40 per cent of LGB people say they are worried about being the victim of a crime. This compares to 13 per cent of people on average who are worried about being the victim of a crime. A survey of Homophobic hate crime in 2008 showed that eleven per cent of LGB people say being the victim of a crime is their biggest worry.</p> <p><u>Local data</u> Analysis from the CSP Strategic Assessment 2012 under Cohesion & Hate Crime indicator recording the number of Homophobic offences shows no pattern in the levels of offences each year. The figures from the control period shows increases one year and decreases the following, this is due to the low number of offences that are reported each year in the borough, 71 in the year up to September 2012. Over the past three years the average number of offences was 73.</p> <p>Recommendations from CSP Strategic Assessment to CSP and Subgroups were that their action plan should maintain a continued focus on all Hate Crime Offences of which Homophobic Crime can be categorised. The CSP and its Subgroups should continue their work around education of potential victims to boost confidence and increase reporting and work with the LGB community to address</p>

		homophobic attitudes which drive hate incidents and hate crimes. It should also carry on with various education/crime prevention plans linked to this subject to prevent further incidents/crimes.
Religion or Belief	Positive	<p>For Religion/Belief equality , the priority of addressing Hate Crime and Cohesion may be of particular relevance.</p> <p><u>National and regional data</u> Analysis by the Home Office shows that there were 43,748 hate crimes recorded by the police in 2011/12 in England and Wales, of which 1,621 (4%) were religion hate crimes.</p> <p>Analysis from the MOPAC Policing and Crime Plan 2013-17 Equality Impact Assessment 2013 states that hate crime is greatly unreported and which is a great concern for many communities. In 2011/12 there was a 6.8% reduction in the number of reported racist and religious hate crimes.</p> <p><u>Local data</u> Analysis from the CSP Strategic Assessment 2012 under Cohesion & Hate Crime indicator recording the number of racist and religious offences showed a 9% decrease (34 less) in the number of offences in the year up to September 2012, when compared to the previous year. Offence numbers have remained reasonable static for the last 3 years, with an average of 358 offences a year, or one a day.</p> <p>Recommendations from CSP Strategic Assessment to CSP and Subgroups were that their action plans should maintain a continued focus on all Hate Crime Offences of which Racist and Religious Offences fall into. The CSP and its Subgroups to continue their work around education of potential victims and suspects within this crime category and to carry on with various education/crime prevention plans linked to this subject.</p>
Age	Positive	<p>For age equality , the priorities of addressing Gangs & Serious Youth Violence and Reducing Re-offending may be of particular relevance.</p> <p><u>National and regional data</u> Analysis from the Mayor's Office for Policing and Crime states that London is disproportionately affected by crime problems, such as robbery and knife crime, typically associated with young males who often operate in groups or 'gangs'. In 2011 14% of homicides (19) were gang related and two thirds (12) were teenagers. Gang members mostly fall into the 13-24 age range, with the largest cohort being 18-24 (75% of the highest harm individuals are over the age of 18); intelligence also suggests</p>

that 10-13 year olds are increasingly being drawn into gang membership.

Analysis from the Ministry of Justice's Breaking the Cycle: Effective punishment, rehabilitation and sentencing of offending 2010, states that 75% of young people released from custody and 68% of young people on community sentences re-offend within a year

Analysis from the CSP Strategic Assessment 2012 provided by the Metropolitan Police to Victim Support regarding victims of crime by ethnicity and age is not thorough. However looking at victim breakdown by age shows that 18 – 24 year olds are over represented at 24% of the borough's victims when compared to the population figure from the 2011 census of 12%. It also shows that 25-34 year olds are over represented in the victim breakdown for the borough at 34%, when compared to this group making up 25% of the population.

Local data

Analysis from the CSP Strategic Assessment 2012 under Violent Crime Indicator for the 'Number of Most Serious Violence offences per 1,000 of the population' and 'Number of Assault with Injury' show that offenders and victims show similar patterns of age, with a peak occurring in the 20's and a steep decline as age increases.

Recommendations from CSP Strategic Assessment to CSP and Subgroups was that their action plan should include a continued focus on Violence Related Offences, the Community Safety Partnership to continue its work around education of potential victims and suspects within this crime category. Carry on with various education plans linked to this subject and continue crime prevention programmes. The subgroup responsible for the CSP Priority Violence (with a focus on Domestic Violence) action plan should contain detailed actions to address these findings, which should lead to a decrease in the number of offences and an increase in partnership working, social cohesion and education around this subject. It recommends a continued investment in youth diversionary/outreach services to prevent young people being involved in crime and anti-social behaviour either as a victim or a perpetrator. The borough Gangs Matrix aims to tackle those already involved in gang activity/crime, offering ways out of offending behaviour or where this is not accepted by the offender, taking enforcement action against them.

Analysis from the CSP Strategic Assessment 2012 under Violent Crime Indicator for the number of 'Hospital admissions for unintentional and deliberate injuries for young people aged 0 – 17 years, shows that 0 – 4 and 5 – 14 age groups by 3 year pooled data, show downward trends in the numbers of admissions, with a more pronounced downward trend in 0 – 4 year age group.

Recommendations from CSP Strategic Assessment to CSP and Subgroups are for

- Programmes that support parents and families, develop life skills in children, work with high risk youth and reduce availability of and misuse of alcohol have proven effective at reducing violence. Measures to ensure appropriate identification, care and support mechanisms are in place are important in minimising the harms caused by violence and reducing its recurrence.
- Reducing violence to 0-5 does depend on widespread, multi-sectorial action and requires a well-planned strategic approach to involving all members of the partnership and Local Safeguarding Children Board. Moving straight into action planning now would be precipitate. However better data on presentations to A&E (work is on-going), we need better information on what is being delivered across the piece and thirdly we need a strategy that sets out what, why and how we are proposing action.

The subgroup responsible for the CSP Priority Violence (with a focus on Domestic Violence) and Local Safeguarding Children Board (LSCB) action plans should contain detailed actions to address these findings, which should lead to a decrease in the number of offences and an increase in partnership working, social cohesion and education around this subject.

Analysis from the CSP Strategic Assessment 2012 under Property Crime indicator 'Number of Personal Robberies' will also contain some correlation with Serious Youth Violence and Knife Crime and shows that School pupils and students account for almost half of all victims on the borough, with mobile phones being the most frequently stolen property around 29% of all property taken. Personal Robbery appears to be mainly a crime whereby the majority of suspects are aged between 15 and 19 years and the majority of victims tend to be youths. Knife Enabled Robbery remained a persistent proportion of all personal robbery offences.

Recommendations from CSP Strategic Assessment to CSP and Subgroups was that their action plan should include a continued focus on Personal Robbery Offences and offenders as there are overlaps between offenders for robbery and other offence types. Community Safety Partnership and subgroups to continue their work around education of potential victims and suspects within this crime category. Carry on with various education plans linked to this subject and continue with crime prevention programmes. The subgroups responsible for the CSP Priorities Reducing Re-offending and Gangs & Serious Youth Violence action plans should contain detailed actions to address these findings, which should lead to a decrease in the number of offences and an increase in partnership working, social cohesion and education around this subject.

Analysis from the CSP Strategic Assessment 2012 under Youth Crime, measures the number of victims, offenders, incidents, entering custody, successfully completing orders and proven re-offending of young people. They show clear correlations between Knife Crime Offences, Robbery Offences and Serious Youth Violence as these offences tend to overlay each other in crime types and peak and trough at the same time throughout the year.

Recommendations from CSP Strategic Assessment to CSP and Subgroups was that their action plan should acknowledge the clear correlation between Knife Crime, Robbery and Serious Youth Violence and vital partnership working around all three identify the link and adapt their plans accordingly to ensure that they are all part of the strategy and performance measure. Increase in activity around hotspot wards for these offences will impact on one another as there is a link between the schools and robbery offences. Partnership working around facilities provided (ie. Schools, youth clubs and leisure facilities), as 80% of all Tower Hamlets' serious youth violence victims lives within the borough. The subgroups responsible for the CSP Priorities Reducing Re-offending and Gangs & Serious Youth Violence action plans should contain detailed actions to address these findings, which should lead to a decrease in the number of offences and an increase in partnership working, social cohesion and education around this subject.

Analysis from the CSP Strategic Assessment 2012 under Drugs and Alcohol, measures the number of Young People taking drugs and or alcohol in specialist treatment has shown an 11.5% increase in the number of Young People in treatment over the three year period. This could be down to the realignment of services due to changes in funding, the YOT becoming part of the specialist treatment network and having a dedicated drug worker or a combination of both. However it is expected that the performance over the coming 3 years is likely to stay relatively stable, which goes against the national trend of a decrease over both periods.

Recommendations from CSP Strategic Assessment to CSP and Subgroups was that specialist treatment service should continue to be monitored and adjustments made to it in accordance with the needs of the users/clients.

Analysis of National Research shows that Domestic violence is a significant issue for the welfare of children and young people. It is estimated that nearly three quarters of children on the 'at risk' register live in households where domestic violence is occurring (Department of Health 2002 – Women's Mental Health: Into the mainstream). The majority of children in households experiencing domestic

		<p>violence will witness abusive behaviour. It is estimated that 90% of children are in the same or next room when abuse occurs (Hughes, 1992)</p> <p>Response from Tower Hamlets Safeguarding Children's Board is that it has risk assessment tool to support professionals in identifying risks to children in families experiencing domestic violence and ensure appropriate response and actions. The tool and accompanying guidance supports the London safeguarding children board procedure "Safeguarding children abused through domestic violence".</p>
Socio-economic	Positive	<p>For this target group, the priorities of Drugs and Alcohol and Reducing Re-offending may be of particular relevance.</p> <p>Analysis from the CSP Strategic Assessment 2012 under Violence Against women and Girls, shows an increase in the number of domestic violence offences by 6% year on year over the three year period. This increase could be down to a number of factors including an increasing number of people living in the borough; overcrowding and; the economic downturn, particularly the associated pressures that these can bring, but also may be down to an increase in confidence to report offences.</p> <p>Recommendations from CSP Strategic Assessment to CSP and Subgroups were that their action plans should include a continued focus on all violence related offences, especially those that can be linked to Domestic Violence. The CSP and Subgroups should continue to work and focus around education of potential victims and engaging with suspects within this crime category. Carry on with various education plans linked to this subject and continue with crime prevention programmes.</p>
Marriage and Civil Partnerships.	Positive	No data available for analysis
Pregnancy and Maternity	Positive	<p>Research nationally shows that It is estimated 30% of domestic violence begins or escalates during pregnancy, and it has been identified as a prime cause of miscarriage or still-birth, premature birth, foetal psychological damage, foetal physical injury and foetal death. The mother may be prevented from seeking or receiving adequate ante-natal or post-natal care. In addition, if the mother is being abused this may affect her attachment to her child, more so if the pregnancy is a result of rape by her partner.</p>

	Response from the CSP and the DV Forum is that they have recognised this increased risk during pregnancy and recent birth of a child. It has included this in their Domestic Abuse Stalking and Honour-based Violence Risk Assessment Form, for consideration of individual cases when taking cases to their Multi Agency Risk Assessment Conference on a bi-monthly basis.
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As a result of completing the above, what is the potential impact of your policy/function on the public, giving particular regard to potential impacts on minority or protected groups?


High Medium Low

Equalities to be further considered at the Action Planning stage.

If you have identified a LOW impact or, there has been NO SIGNIFICANT amendments to an existing policy/function there is no need to continue to a full equalities analysis.

If you have assessed the potential impact as MEDIUM or HIGH you will now need to complete a full equalities analysis - building upon the findings of the initial impact assessment (section 4)

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Decision Report Cover Sheet: Council 5 December 2016	 TOWER HAMLETS
Cover Report of: Matthew Mannion, Committee Services Manager	Classification: Unrestricted
Violence Against Women and Girls (VAWG) Strategy 2016/19	

Originating Officer(s)	Matthew Mannion, Committee Services Manager (Cover Report)
Wards affected	All Wards

Summary

The Violence Against Women and Girls (VAWG) Strategy was presented to Cabinet on 4 October 2016 where it was considered by the Mayor and Cabinet Members. The Mayor agreed that the Strategy should be recommended to Council for approval.


The Report and Appendices are attached to this Cover Sheet.

Recommendations:

The Council is recommended to:

1. Agree the Violence Against Women and Girls Strategy be adopted.

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Cabinet	
4 October 2016	
Report of: Shazia Ghani, Safer Communities, Communities, Localities and Culture	Classification: Unrestricted
Violence Against Women and Girls Strategy 2016	

Lead Member	Councillor Shiria Khatun, Cabinet Member for Community Safety
Originating Officer(s)	Shazia Ghani Head of Community Safety and Menara Ahmed DV and HC Manager
Wards affected	All wards
Key Decision?	Yes
Community Plan Theme	Safe and Cohesive Borough

Executive Summary

There is a requirement for each Community Safety Partnership (Safe & Cohesive CPDG in Tower Hamlets) to have a Violence Against Women and Girls Strategy. From a statutory perspective the responsibility to develop a VAWG Strategy lies with the Community Safety Partnership. This strategy comprises part of the Council's Crime and Disorder Reduction Strategy, which is a policy framework document which requires recommendation by Cabinet to full Council for approval.

Cabinet is required to agree and sign off the next three years VAWG Strategy (2016-2019) and the accompanying consultation report informing its development. Tower Hamlets has had a domestic violence team for over 15 years and a specific action plan for at least 10 years, aimed at tackling domestic violence against anyone who is experiencing abuse. In 2013, the borough launched an additional strategy, the Violence Against Women and Girls (VAWG) Plan aimed at addressing the disproportionate impact of gender based violence on female residents of the borough and linked to existing VAWG Strategies across London, nationally and internationally.

Abuse can take place regardless of gender, ethnicity, faith, sexuality or age. Whilst we recognise that the issues addressed here have a disproportionate effect on women, we also recognise that boys and men are victims of violence too. As a Council and as a Community Safety Partnership and a Local Strategic Partnership, we remain committed to providing support for all victims of abuse and the intention of this plan is to strengthen our response to responding to abuse rather than distract from it. This draft strategy and supporting documentation is presented for securing final approval.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the content of the VAWG Strategy (appendix 1)
2. Agree that this report, the VAWG Strategy is recommended to Full Council for approval.

1. REASONS FOR THE DECISIONS

- 1.1 Full Council must adopt a VAWG Strategy in order to meet government requirements. The priorities and governance structure outlined in the CS Plan are based on the statutory strategic assessment exercise that was carried out by statutory partners to consider data priorities in the Borough. They have been agreed by the DV Forum and Community Safety Partnership in Tower Hamlets. The Cabinet is asked to consider the Strategy for recommendation to Full Council pursuant to the policy framework procedure.

2. ALTERNATIVE OPTIONS

- 2.1 It is a statutory responsibility for Community Safety Partnerships to produce a VAWG Strategy as it forms part of the Community Safety Plan within the Council's Crime and Disorder Reduction Strategy. There are therefore no alternative options to doing so.

3. DETAILS OF REPORT

- This is Tower Hamlets' second VAWG Plan. Tower Hamlets has had a Domestic Violence Team for over 15 years and a specific action plan for at least 10 years, aimed at tackling domestic violence against anyone who is experiencing abuse. In 2013, the borough launched an additional strategy, the Violence Against Women and Girls (VAWG) Plan, aimed at addressing the disproportionate impact of gender-based violence on female residents of the borough and linked to existing VAWG Strategies across London, nationally and internationally.
- 3.2 This draft strategy highlights the commitment of the Partnership to strengthen a coordinated multi-agency approach to tackling VAWG over the next three years and build upon the previous VAWG Plan. This is a partnership document, agreed through the VAWG sub group and CSP Board
 - 3.3 The aim of the VAWG Strategy is to support the work of the Domestic Violence and Hate Crime Team (DVHCT), within which the VAWG work sits, through the provision of a joined up and comprehensive approach to addressing all forms of gender-based violence. To that end the VAWG

Steering Group and Plan forms an additional CSP subgroup area linking in to the structures of the DVHCT and the work of the Domestic Violence Action Plan including the Community Safety Partnership (CSP) and Domestic Violence Forum (DVF) subgroup.

3.4 **METHOD**

In developing the VAWG Strategy we have used a consultative engagement approach with professionals, survivors of violence, local residents and young people to ensure that we include their views. We have also utilised a 'Stages of Change' methodology to enable a systematic review to inform our key performance indicators and outcomes.

3.5 **CONSULTATION**

Between October 2015 and February 2016, a comprehensive consultation process was undertaken across the Borough to support the development of the second Violence Against Women and Girls (VAWG) Plan which will be published in 2016.

3.6 The violence against women and girls consultation involved:

- Consultation with professionals and partners through our local VAWG professional networks
- An on-line consultation
- Individual interviews with key stakeholders
- A series of focus groups held with local groups of survivors, women and young people
- Feedback has also been sought from DMT, CMT and MAB to influence and shape the final report and the inclusion of a number of appendices.

3.7 Key partners and stakeholders consulted included: VAWG Steering Group; Community Safety Partnership; Local Safeguarding Children's Board (LSCB) Members; Multi-Agency Sexual Exploitation (MASE) and Practitioners' Forum members; Key contacts within Children's and Adults' Social Care; Safer Communities; Public Health; Barts Health; Mental Health Services; Domestic Violence Forum; Youth Council; Survivor Groups; Housing Options; Voluntary and Community Organisations and Local Residents.

3.8 A consultation report was prepared to inform the new three year VAWG plan. This report (attached) outlines the key learning from the consultation process and looks at the prevalence of various forms of violence against women and girls within the borough. It also examines the experience of female survivors of violence and provides an overview of what we currently know about local needs. It provides an overview of the national and regional context of work on addressing violence against women and girls and an assessment of our current approach in Tower Hamlets. It also highlights proposals made during the consultation by participants.

- 3.9 This action plan will be governed through the VAWG sub group reporting to the CSP Board. The VAWG action plan attached in the appendix was signed off by the VAWG steering group in April 2016 and CSP Board in July 2016,

GENERAL FINDINGS

- 4.1 The recommendations in the draft strategy are set out below in summary and the operational activity driven by these recommendations will be defined and further developed by the joint working arrangements already in place within the Partnership.

4.2 Survivor and Community Recommendations

- Prevention should be a key priority within the VAWG strategy
- A multi-agency approach to delivering services for survivors is the considered to be the best approach
- Multi-pronged but individualised approaches are needed to best support survivors
- Perpetrators should be given support to understand the consequences of their behaviour
- There is a need for a public awareness campaign to help women members in the community understand that experiencing abuse is not their fault
- Delivery of training to professionals on how to support survivors of VAWG promoting an empathetic approach
- Peer support methods, including group sessions, should be implemented
- Community champions-programmes should be expanded

4.2 Young people's Recommendations

- Focus on providing young people with information about all of the strands of VAWG and where they can get help and support
- Develop the work in schools to ensure that all young people are getting the right messages about what is acceptable and what is not acceptable
- Further develop youth programmes, recognising that young people will often disclose to other young people
- Work with parents so that they understand the issues that young people face and can support their children
- Work with young people so that they can recognise that pornography and the media send out the wrong messages to young people about what healthy relationships look like

4.3 Professionals' Recommendations

- Prevention should be a key priority in a climate of welfare reform and cuts. Continuation and expansion of work with young people, starting from reception is vital

- Links between competing priorities and VAWG should be made more explicitly – for example countries where FGM is emerging due to the increase in radicalisation and the increase in threat of extremism as a factor in child arrangement orders in the family courts
- Maintain the four objectives from the previous VAWG Plan but expand to highlight the need for better partnership working and participation by survivors
- Develop work across sectors, including having a renewed focus on women experiencing multiple disadvantage and work with older and disabled women
- Develop a survivors' forum which will be a peer support group for survivors of all forms of VAWG
- Commission services for young people experiencing VAWG as they can fall through gaps between children's and adult services
- Develop links with some of the large employers in the borough to highlight the impact of VAWG on their staff
- The key barriers to disclosure are faced by women experiencing multiple disadvantage and a fear of institutions. These need to be a key focus of the VAWG Strategy
- There is broad based support for the existing strands but there needs to be a focus on the internet as a facilitator of abuse

5. COMMENTS OF THE CHIEF FINANCE OFFICER

- 5.1 The report sets out the consideration of the VAWG three year draft strategy and highlights that up to £1m of funding was received over the previous three year strategy from external sources such as MOPAC, DfE, DCLG that supplemented the Policy and Victim budget of £571,000.
- 5.2 Given the financial constraints being faced by the Council and other partners, it is imperative that funding levels for the service are considered fully as part of the Council's Outcomes Based Budgeting approach for 2017 -2020. This will include the identification of complementary funding and consideration of the most effective way to respond to this area of work alongside the Council's wider priorities.
- 5.3 Consequently whilst there are no direct financial implications emanating from this report, the extent to which funding at the levels previously seen will continue to be available must be a consideration. There are a number of recommendations contained within the strategy that will need to be defined and further developed as they would seem to have the potential for significant financial implications which is not currently in place.
- 5.4 Any proposals that cannot be accommodated within the current budget provision will require financial approval as part of the Medium Term Financial Strategy (MTFS) process before further commitments are made.

6. LEGAL COMMENTS

- 6.1 This report relates to the draft Violence Against Women and Girls (VAWG) Strategy for 2016-19. There is a statutory requirement for such a strategy as the Council is one of the responsible authorities for Tower Hamlets, within the meaning of section 5 of the Crime and Disorder Act 1998 ('the 1998 Act'). Other responsible authorities for Tower Hamlets include: every provider of probation services in Tower Hamlets; the chief officer of police whose police area lies within Tower Hamlets; and the fire and rescue authority for Tower Hamlets. Together, the responsible authorities for Tower Hamlets are required to formulate and implement strategies for: the reduction of crime and disorder; combating the misuse of drugs, alcohol and other substances; and the reduction of reoffending pursuant to section 6 of the 1998 Act. When formulating and implementing these strategies, each authority is required to have regard to the police and crime objectives set out in the police and crime plan for Tower Hamlets.
- 6.2 Additionally, when considering this Strategy regard must be had to section 17 of 1998 Act and which places an obligation of the Council to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area
- 6.3 Development of the VAWG strategy complies with a number of the Council's key safeguarding duties. The Care Act 2014 sets out the council's duties to safeguard adults who are experiencing or at risk of abuse or neglect. The statutory guidance issued under the 2014 Act details the processes to follow during safeguarding investigations. This must be implemented together the Pan London Adult Safeguarding Policy and Procedures dated 03.12.2015.
- 6.4 The 2014 Act also sets out the council's duties to: - a) ensure the provision of preventative services, b) promote wellbeing when carrying out any of their care and support functions (this includes protection from abuse and neglect), c) cooperate with relevant partners and d) provide information about services available in the area that can prevent abuse and support.
- 6.5 The Children Act 1989 provides the legislative framework relating to the council's duty to protect children from abuse and neglect and to promote the welfare of all children and young people in their area. Some of the council's responsibilities for the care and protection of children and young people are listed under, sections 17, 20, 31 and 47 of the 1989 Act.
- 6.6 Section 11 of the Children Act 2004 places duties on a council to ensure its functions are discharged having regard to the need to safeguard and promote the welfare of children. Section 10 of 2004 Act and Section 27 of the 1989 Act refers to the requirement for local authorities to cooperate with other agencies to promote the well-being of children.
- 6.7 With regard to consultation, regulations 12 to 14A of the Crime and Disorder (Formulation and Implementation of Strategy) Regulations 2007 provide for

Community Engagement. Further, in consulting, the Council must comply with the common law principles set out in *R v Brent London Borough Council, ex p Gunning*, (1985) and recently approved by the Supreme Court in *R(Mosely) v LB Haringey 2014*. Those are ‘*First, that consultation must be at a time when proposals are still at a formative stage. Second, that the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response. Third that adequate time must be given for consideration and response. And finally, fourth, that the product of consultation must be conscientiously taken into account in finalising any statutory proposals.*’ There is no prescribed period for consultation, but principles of fairness apply such that there should be sufficient time for those being consulted to consider and respond to the matters arising, having regard to their complexity, impact etc. It is necessary to comply with the common law requirement to consider any feedback before making a decision.

- 6.8 Consultation has been carried out as referred to in paragraphs 3.4 through to 3.9 of the report. The responses have been incorporated into the Consultation Report in the Appendices and the consultation responses must be conscientiously taken into account before the final adoption of the Strategy.
- 6.9 The adopting of VAWG Strategy for 2016-19 is for Full Council. The Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended) provide that the making of a crime and disorder reduction strategy pursuant to sections 5 and 6 of the 1998 Act is a function that is required not to be the sole responsibility of the Council’s executive. In that regard, Part 2 Article 4 of the Council’s Constitution includes the crime and disorder reduction strategy sections 5 and 6 of the 1998 Act in the policy framework. The Substance Misuse Strategy forms a part of the Council’s crime and disorder reduction strategy and, on this basis, the final making of the strategy is for Full Council.
- 6.10 However, pursuant to the Council’s Budget and Policy Framework Procedure Rules, the Mayor as the Executive has responsibility for preparing the draft plan or strategy for submission to the full Council. It will therefore be for the Mayor in Cabinet to recommend the draft strategy to Full Council.
- 6.11 In the exercise of its functions, the Council must comply with the public sector equality duty to eliminate unlawful conduct under the Equality Act 2010, namely the need to have regards to equality of opportunity and the need to foster good relations between persons who share a protected characteristic, including ethnicity, gender, disability, and age and those who do not. We note that an EQIA has been completed for the VAWG Strategy and that all equality strands have been considered.

7. ONE TOWER HAMLETS CONSIDERATIONS

- 7.1 The Community Safety Partnership (Safe and Cohesion Community Plan Delivery Group) aims through its plan, to make Tower Hamlets a more

cohesive place to live, work, study and visit. The work of the DV Forum, MARAC, No Place For Hate Forum; Community Cohesion, Contingency Planning Tension Monitoring Group and the Preventing Violent Extremism Programme Board, all subgroups of the CSP aim to carry-out this important part of work for the Partnership. Tackling gender based crime remain an important priority for the Partnership.

- 7.2 An EQIA has been completed for the VAWG Strategy and all equality strands have been considered. VAWG work aims to ensure One Tower Hamlets by aiming to eliminate gender based violence and discrimination.

8. BEST VALUE (BV) IMPLICATIONS

- 8.1 Whilst difficult to quantify there are potentially significant efficiency gains from working in partnership to reduce violence against women and girls in the borough. The Strategy which is a partnership document brings together key crime and disorder reduction agencies to ensure that we continue to work together as a partnership and share resources.

9. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 9.1 Approval and publication of the VAWG Strategy is expected to have a positive effect on the environment by helping to reduce violence against women and girls. This will then reduce the amount of serious and violent crime in the borough including domestic homicides, rape, sexual assault, prostitution, forced marriage, honour based violence, stalking, harassment, sexual exploitation and dowry related abuse as well as other environmental crimes in the borough.

10. RISK MANAGEMENT IMPLICATIONS

- 10.1 There is risk that the name of the strategy is biased towards females, however, it is explicitly stated in the report that this is in line with national terminology from government, and that our strategy works across all protected characteristics. Majority of VAWG services support men and women.

11. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 11.1 The decision to approve the VAWG Strategy will ensure we continue to work in partnership to tackle VAWG, ensure support for victims and ensure enforcement action against identified perpetrators. It will also support the Mayors priorities contributing to relevant 'safer' related community plan commitments.

12. SAFEGUARDING IMPLICATIONS

- 12.1 The Community Safety Partnership includes amongst its members the independent chairs of the DV Forum, Safeguarding Adults and Safeguarding Children Boards. These boards are seen as 'linked boards' to the CSP and

have been included in the development process. There are no safeguarding risks identified in the report, only benefits for partner agencies across the CSP and both Safeguarding Boards by working together at strategic and operational levels in the borough, to ensure tackling VAWG in all its forms.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE.

Appendices

- Appendix 1: VAWG Strategy & VAWG Consultation Report
- VAWG Consultation Report
- VAWG EIA Check List
- VAWG EIA
- VAWG Action Plan 2016-17
- DV Action Plan 2016 – 17
- NPFH Action Plan 2016-17

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- NONE

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London Borough of
Tower Hamlets

Draft
Violence against
Women and Girls
Strategy
2016-2019

Foreword – Executive Mayor of TH

Foreword – Deputy Mayor and Cabinet Member for Community Affairs

Contents

	Page
Introduction	5
Why have a VAWG Strategy?	5
Evaluating our work on VAWG	6
Outline of the VAWG Strategy	9
Theory of Change	15
Strategic Approach	18
Strategic Priority 1: Prevention and Early Intervention	19
Strategic Priority 2: Provision of Appropriate Support to Survivors	21
Strategic Priority 3: Protection from Abuse	23
Strategic Priority 4: Partnership Working across Statutory and Voluntary Agencies	25
Strategic Priority 5: Participation of Victim/Survivors to Inform Services	27
Strategic Priority 6: Perpetrator Accountability	28
Implementing the VAWG Strategy	30
Measuring Success	32
Appendix 1: Definition of the VAWG Strands	33
Appendix 2: Coordinated Community Response to VAWG	35
Appendix 3: Consultation Log	36
Appendix 4: Performance Matrix 2015/2016	42
Appendix 5: 'Whole School' approach	55
Appendix 6: Person Centred Approach	59
Appendix 7: List of Acronyms	60

Introduction

This is Tower Hamlets' second VAWG Plan. Tower Hamlets has had a Domestic Violence Team for over 15 years and a specific action plan for at least 10 years, aimed at tackling domestic violence against anyone who is experiencing abuse. In 2013, the borough launched an additional strategy, the Violence Against Women and Girls (VAWG) Plan, aimed at addressing the disproportionate impact of gender-based violence on female residents of the borough and linked to existing VAWG Strategies across London, nationally and internationally.

This current strategy outlines and highlights the commitment of the partnership to strengthen a coordinated multi-agency approach to tackling VAWG over the next three years and build upon the previous VAWG Plan. It is key to note that the strategy is a partnership document led through the Council and has cross cutting outcomes that are delivered and supported through a number of forums and boards such as the Domestic Violence Forum, Prevent Board, No Place for Hate Forum and Child Sexual Exploitation Group. The Domestic Violence and Hate Crime Team (DV&HCT) supports the development of co-ordinated community responses to hate crime. A threefold approach which includes ensuring support and protection for all victims and witnesses, ensuring enforcement action is taken against any identified perpetrators and partnership and raising awareness work focuses on prevention and reducing the harm these crimes cause to individuals, families and the community as a whole.

Why have a VAWG Strategy?

The aim of the VAWG Strategy is not to replace the existing work of the Domestic Violence and Hate Crime Team (DVHCT), within which the VAWG work sits, but to complement the team through a strategic approach to address all forms of gender-based violence. To that end, the structures of the DVHCT, including the Domestic Violence Action Plan and the Community Safety Partnership (CSP) Domestic Violence Forum (DVF) subgroup continued in their original form with the VAWG Steering Group and Plan forming an additional CSP subgroup area.

Addressing violence against women and girls is already recognised as a priority area regionally, nationally and internationally. The UN Declaration on the Elimination of Violence Against Women was adopted by the General Assembly in 1993. This was followed by a resolution of intensification of efforts to eliminate all forms of violence against women in 2009. In 2010, the Mayor of London published 'The Way Forward'; a London-wide plan aimed to end all forms of violence against women in the capital and followed this with a refreshed strategy in 2013. In 2011, the Coalition Government published its 'Call to End Violence Against Women & Girls' which outlines the responsibility of Local Authorities to co-ordinate their response to VAWG issues. The Mayor of London's Policing and Crime Plan, launched in 2013 also has tackling VAWG as a key priority.¹ Tower Hamlets VAWG Plan takes a pro-active partnership approach to addressing this problem and makes a strong statement about the Council's commitment to safeguarding adults and children and pursuing gender equality.

Approximately 97% of all known victims of interpersonal violence in Tower Hamlets are female - a significant gender bias towards women. A Violence against Women and Girls approach sees the phenomenon of violence against women as both a cause and effect of fundamental inequalities

¹ The Policing and Crime Plan is currently in transition for 2016 and will be updated following consultation held by MOPAC in winter 2016. Our VAWG Strategy will be revised in light of any key changes.

between males and females. The Preamble to The UN Declaration on the Elimination of Violence against Women (1993) states that *"violence against women is a manifestation of historically unequal power relations between men and women, which have led to domination over and discrimination against women by men and to the prevention of the full advancement of women, and that violence against women is one of the crucial social mechanisms by which women are forced into a subordinate position compared with men."*

It is important that Violence against Women and Girls (VAWG) is not seen as a series of incidents or assaults which an individual experiences. VAWG describes violent and oppressive patterns of behaviour and practises, which achieve power and control over women and girls. It impacts on the physical safety, health and emotional well-being of individuals and impacts on families, carers, children and the community as a whole. As Alison Saunders, Director of Public Prosecutions has recently highlighted, *until it is no longer the case that the vast majority of these crimes are committed by men using power, coercion and violence against women, amending the title of VAWG would put the victims of these crimes back into the dark, where they have been kept for far too long.*²

Abuse can take place, however, regardless of gender, ethnicity, faith, sexuality or age. Whilst we recognise that the issues in the previous plan and this strategy have a disproportionate effect on women, we also recognise that boys and men are victims of violence too - 3% of all victims of interpersonal violence in Tower Hamlets. As a local area, we remain committed to providing support **for all victims of abuse** and the intention of this plan is to strengthen our response to responding to abuse rather than undermining this approach.

Evaluating our work on VAWG

Highlighting VAWG work to date

As outlined, we are developing our second VAWG Strategy. However, it is important to reflect upon the headline successes and challenges since 2013. Some of the key outcomes are outlined below:

- Almost £1,000,000 funding raised from external sources including MOPAC, DfE and DCLG
- Recruitment of over 150 VAWG Champions from organisations across the borough, ensuring that our champions represent the full diversity of communities in the borough.³
- Development of a multi-agency training programme and the Training and Awareness Officer post
- Development of a partnership approach to prostitution including a 'prostitution MARAC'
- Tower Hamlets is one of only 5 boroughs to participate in a MOPAC and DfE funded pilot to tackle 'harmful practices'
- VAWG network of over 500 participants
- Over 1800 young people have received lessons
- Nearly 2000 professionals have received training
- 'Whole School' approach to prevention developed and implemented in schools across the borough

² Saunders, A. (2015) 'Some violence is targeted at women and girls – we can't ignore that', Alison Saunders, Director of Public Prosecutions in The Guardian Newspaper, 28.07.15

³ We have recruited champions from different communities across Tower Hamlets. Additionally, we have champions who represent LGBT residents and who represent disabled residents in the borough.

- MARAC referrals for all strands of VAWG have increased, highlighting increased awareness by professionals
- Change in working practice around harmful practices where Tower Hamlets is now seen as a best practice borough across London
- Increase in men working to tackle VAWG – VAWG is not just seen as a ‘women’s issue’ and men are championing the work around gender equality.
- Increase awareness through training regarding exploitation and radicalisation and the use of social media
- Police reporting across all strands except dowry related abuse increase (dowry abuse is expected to have been subsumed within wider ‘domestic abuse’ flags).
- Development of a strong multi-agency partnership approach across all strands
- Increased awareness of VAWG across the wider community including recruitment of VAWG Community Champions. This project recruits local volunteers to go out into the community utilising their unique skill set to ensure One Tower Hamlets messages are far reaching. Accredited “hate crime leadership” training is also being planned for 2016-17. The programme empowers local people to play their part in promoting community cohesion including targeting members from across all areas of the community to take part.
- No Place for Hate Campaign promotes increased public awareness of hate crime through a range of publications. The campaign is high profile communicated through outreach, billboards, advertisements and local media including at key LGBT events such as IDAHO and Pride and the national 16 days of action campaign.
- No Place for Hate Pledge aims to encourage all individuals who live, work or visit the borough to make a united stand against prejudice and discrimination. This public condemnation aims to send a strong message to offenders that Tower Hamlets is No Place for Hate and discrimination. It also encourages organisations to sign up to the Pledge committing them to ensuring their organisation is equipped to respond to hate incidents effectively.
- Community project delivered through the Prevent Programme which have focused on social media and exploitation, raising awareness of safe messages and risks and recognising abuse. This covers areas of bullying to radicalisation. This has been delivered through both primary and secondary schools in 2015-16 and funding has been secured to deliver this to further schools in 2016-17 and further support sessions for parents and carers planned.
- The International Day Against Homophobia, Biphobia and Transphobia – Hatred Hurts All Conference aimed at those who work with victims of hate crime and was delivered in May 2016. This brought together all partner agencies and communities with the pledge to tackle and promote the no tolerance to any form of hate crime in the borough and outline support and services that are available for those wishing to report any issues/incidents and to victims.
- The borough has continued to deliver on the Hate Incident Panel which provides a coordinated response by partners on hate incidents.

Areas for Development

Our consultation for the development of the current strategy⁴ has highlighted that there are areas that we are currently working on (including all of the above) that should be maintained and there are areas that we need to develop during the 2016-2019 period.

⁴ Our consultation process ran from October 2015 - February 2016 to ensure that we consulted with as many people as possible. The consultation methodology was varied to allow for different stakeholders to contribute to our Strategy. A consultation questionnaire was launched in October and individual meetings and focus groups started in November 2015. (A paper version of the questionnaire was also available). A report to accompany the consultation is available with key recommendations that fed into the development of the strategy. An executive summary of the report is available in Appendix 3.

The key areas for development included:

- innovation of services;
- increased multi-agency working to reduce resource costs and improve responses;
- renewed focus on No Recourse to Public Funds (NRPF), perpetrators and victims experiencing multiple disadvantage and prioritising prevention work with young people;
- increased awareness and intervention in regards to on line exploitation and grooming.
- Increased need to look at intervention services, continuation of the whole schools approach and working with families and communities to understand abuse across all forms and mainstreaming a safeguarding approach.

Key Challenges and how to mitigate them

What about men?

One of the key challenges in providing a VAWG approach is the belief that our work does not include men and boys. However, the aim behind providing a VAWG approach is the recognition that 97% of victims of interpersonal violence in Tower Hamlets are female. Any victim of violence and abuse deserves to access support and help: the Domestic Violence and Hate Crime Team (within which VAWG sits) will support anyone presenting regardless of gender or sexuality – we recognise that men also experience domestic violence and this is explicit in all the work of the team. However, the VAWG strategy reflects that gender based violence is predominately a pattern of behaviour perpetrated by men against women. We will continue to support all victims regardless of gender and further support and services for victims of abuse can be found in the Domestic Violence action plans produced each year.

Welfare reform and austerity

Another key challenge to providing our work on VAWG is the difficulties that welfare reform coupled with austerity has on the survivors we work with and also the organisations providing specialist support services. Women are disproportionately affected by all of the reforms and victims of VAWG are further victimised through high levels of financial control. We have sought to mitigate some of the impacts through development of the partnerships, the champion programme as well as external funding meaning that our VAWG work can be developed without huge levels of additional resourcing.

Competing priorities

Given the difficulties of prioritising funding in a climate of cuts, VAWG has diminished in some areas as a priority focus. We have sought to mitigate this through close working with priority areas – for example we have developed workshops around the links between extremism and gender-based violence.

New Legislation

A new area which will provide a key challenge to our new Strategy is the introduction of coercive control legislation, which came into force in December 2015. This new criminal offence, with a renewed emphasis on protecting people from abuse, will provide a challenge to existing resources of police, the council and also our partners across the VAWG area. We are also awaiting the new Police and Crime Plan which is currently in consultation. This will also inform in regards to priorities on the broader areas of work in regards to victims of abuse across a range of services including VAWG and DV and Hate Crime.

Sustainable Funding Streams

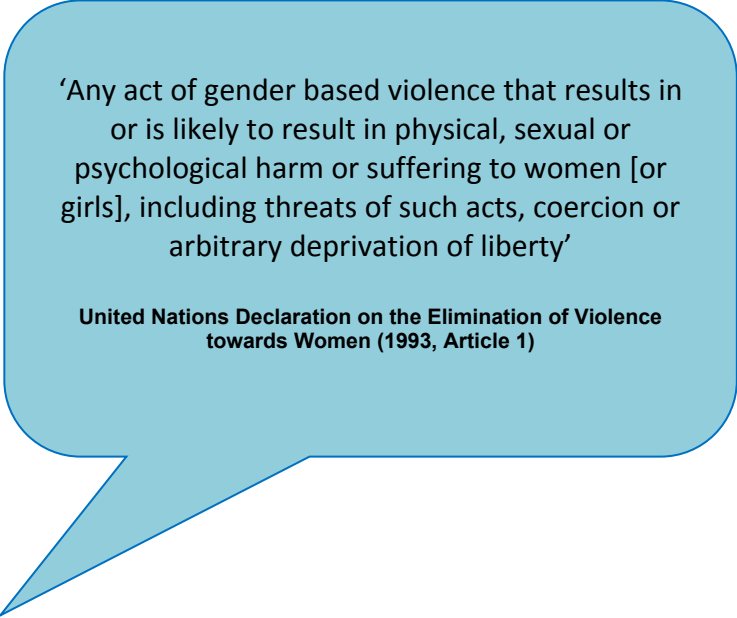
A key area of challenge for all of the work on VAWG is the sustainability of funding. A lot of the work around VAWG is funded externally, either through different departments within Tower Hamlets or by external funders. There is a risk that once the discrete projects (including FGM, Harmful Practices Pilot, Training and Awareness Officer Post and Youth Campaign) finish that there will not be funding to continue the VAWG Strategy work. There is also a risk to projects funded and delivered externally that are subject to the same pressures and cuts to local authority funding, including the IRIS domestic violence project that works in GP surgeries.

Outline of the VAWG Strategy

To address all of the forms of VAWG experienced by women in Tower Hamlets, our Strategy takes a multi-agency approach, recognising that no one agency can support all the victims of VAWG. As outlined above, in developing this strategic approach we worked with a range of organisations to hold stakeholder discussions with female victims of VAWG and women accommodated in refuge and other provision across the borough to ensure that our proposal is survivor led and that it also meets the needs of the diverse range of victims in our borough, including BME women, women with NRPF and women who experience multiple disadvantages.

What is Violence against Women and Girls?

Violence against Women and Girls (VAWG) is both a form of discrimination and a violation of human rights. As outlined above, locally we have adopted the United Nations Declaration on Elimination of all forms of violence towards women, which defines violence against women as:



'Any act of gender based violence that results in or is likely to result in physical, sexual or psychological harm or suffering to women [or girls], including threats of such acts, coercion or arbitrary deprivation of liberty'

United Nations Declaration on the Elimination of Violence towards Women (1993, Article 1)

Violence against Women and Girls includes violence that is targeted at women or girls because of their gender or affects women and girls disproportionately. Examples of the types of violence included are⁵:

⁵ See Appendix 1 for definitions of the VAWG strands

- Sexual Violence
- Domestic Violence
- Trafficking
- Prostitution
- Child Sexual Exploitation including in a gang context
- Female Genital Mutilation (FGM)
- Forced Marriage
- So-called 'Honour' Based Violence
- Dowry Related Abuse
- Stalking and Harassment

We propose to maintain all ten strands but to also explicitly recognise that the internet and social media have facilitated a huge range of online and offline abuses and that this has escalated rapidly over the past three years since we published our first VAWG Plan.

Given that we have successfully bid to the DCLG for a pilot and also the commitment from respondents, it is vital to also have a real focus in the VAWG strategy on women with no recourse to public funds and a renewed focus on women who experience multiple disadvantages (homelessness, mental health, prostitution and drugs and alcohol misuse).

Cost of VAWG in Tower Hamlets

Safe Lives, formerly CAADA, estimated that it costs £20,000 in preliminary support costs during one year per victim before being discussed at Multi-Agency Risk Assessment Conference (MARAC). They estimate that for every pound spent on MARAC, six pounds of public money are saved. Their analysis shows that MARACs save £6,100 of the £20,000 cost per victim discussed.⁶ **This would mean for Tower Hamlets that the MARAC saves £2,519,300 per annum based on 413 cases year.**

Trust for London and the Henry Smith Charity⁷ have estimated that the total cost to Tower Hamlets of domestic abuse (the wider definition which includes most of the strands of VAWG covered within our Strategy) is £31.7 million pro-rated by population of the borough. This figure does not include the human and emotional costs, which they have estimated as £54.6 million. To break the £31.7 million figure down further, they have estimated that the costs are as follows:

Table 1: Costs of VAWG in Tower Hamlets

Service	Cost (£ million)
Physical and Mental Health care	9.5
Criminal Justice	6.9
Social Services	1.6

⁶ CAADA (2010) *Saving Lives, Saving Money: MARACs and high risk domestic abuse*, London: Coordinated Action Against Domestic Abuse (CAADA)

⁷ The spreadsheet, *Costs of domestic violence per local area*, uses the available estimates for the costs of Domestic Violence (Professor Sylvia Walby 2009) to calculate an estimated cost for each local authority area, based on the size of the 16-59 year old population. (This is the age range that is targeted by the Crime Survey for England and Wales, formerly British Crime Survey, from which national estimates of domestic violence prevalence are obtained). It uses the Office for National Statistics 2009 mid-year population estimates.

Housing and refuges	1.1
Civil legal services	2.1
Lost economic output	10.5

Current Prevalence

This strategy has drawn upon a wide range of data sources to establish prevalence which includes a comprehensive consultation process with partners, survivors and organisations across the borough. Despite this, it is widely acknowledged that all strands of VAWG are underreported⁸ and many survivors do not come to the attention of services. This coupled with lack of awareness of professionals around individual strands, means that true prevalence data is not obtainable. However, a major part of the work of the VAWG agenda has been to boost reporting across each priority area and there has been an increase across the majority of strands since 2013.

Borough profile

Tower Hamlets is the 6th smallest London Borough and it is also the 4th most densely populated with a population of 287,100 usual residents.⁹ The population is also extremely diverse with the single largest ethnic group being Bangladeshi (32%) with White British at 31%.¹⁰

Tower Hamlets also has one of the youngest populations in London and has the lowest median age in the country at 29 (the same as Newham) and 74.3% are aged between 16 and 64, with 48% aged 20-39 (19.9% are aged under 16).¹¹

Tower Hamlets has a very mixed demography where there is a mixture of affluent and very deprived areas. Tower Hamlets has two of the richest and four of the poorest wards in London. According to the Multiple Deprivation Index (MDI)¹², Tower Hamlets is now the 24th most deprived boroughs in the country although is 3rd when ranked on the 'extent' measure.¹³

Violence against women and girls (VAWG) is a significant problem in the borough. The Violence Indicator Profiles for England (VIPER) show that Tower Hamlets has the sixth highest number of

⁸ See for example: Home Office (2013) *Ending Violence Against Women and Girls*, London: Home Office; Palermo, T., Bleck, J. and Peterman, A. (2014) 'Tip of the Iceberg: Reporting and Gender Based Violence in Developing Countries', *American Journal of Epidemiology*, 179(5), pp.602-612; Allnock, D., Radford, L., Bunting, L., Price, A., Morgan-Klein, N., Ellis, J. and Stafford, A. (2012) 'In Demand: Therapeutic Services for Children and Young People who have Experienced Sexual Abuse', *Child Abuse Review*, 21, pp.318-334; Kimmel, M. (2002) "'Gender Symmetry" in Domestic Violence: A Substantive and Methodological Research Review', *Violence Against Women*, 8(11), pp.1332-1363; Dragiewicz, M. and DeKeseredy, W.S. (2012) 'Claims about women's use of non-fatal force in intimate relationships: A contextual review of Canadian research', *Violence Against Women*, XX(X), pp.1-19; Lea, S. and Lynn, N. (2012) 'Dialogic Reverberations: Police, Domestic Abuse, and the Discontinuance of Case', *Journal of Interpersonal Violence*, XX(X), pp.1-24

⁹ GLA (2015) *London Borough Profiles*

¹⁰ Tower Hamlets (2013) *Ethnicity in Tower Hamlets: Analysis of 2011 Census*

¹¹ *Ibid*

¹² DCLG (2015) *The English Indices of Deprivation 2015, Statistical Release*, London: Department for Communities and Local Government. Tower Hamlets has become relatively less deprived since 2010 when it was the 7th most deprived borough in the country and was ranked 3rd in both the 2004 and 2007 indices.

¹³ Tower Hamlets has become relatively less deprived since 2010 when it was the 7th most deprived borough in the country and was ranked 3rd in both the 2004 and 2007 indices. 54% of all neighbourhoods in Tower Hamlets rank in the top 10% nationally and it is top in both the older people index and the young people index for the highest proportions living in an income deprived household.

recorded sexual offences in England and the third highest in London, ranking 322 out of 326.¹⁴ In 2014/2015, Tower Hamlets had the 9th highest prevalence in London for Rape and 16th for sexual offences. This is not disaggregated by borough size or population.¹⁵

Tower Hamlets consistently has one of the highest rates of reported domestic abuse across London. Between November 2014 and November 2015 there were 2773 domestic crimes reported which is a 13.3% on the previous year and means that Tower Hamlets had the third highest rates of reporting in London (after Croydon and Greenwich).¹⁶

VAWG Profile

The demographics of Tower Hamlets means that there are relatively high levels of vulnerability within the borough’s population including high numbers experiencing mental health and substance misuse issues as well as those with language support needs and disabilities (physical and learning). Women with additional vulnerabilities find it most difficult to seek help and are therefore often most at risk from abuse. We have found that coupled with No Recourse to Public Funds, women are often living for many years with abuse across the spectrum of gender-based violence. Prostitution is also still a significant issue for the borough – particularly the on-street trade. From our work on VAWG over the past 3 years, we have found that those involved in prostitution are increased risk of violence and abusive behaviour, including sexual exploitation and being sexually assaulted and yet often have housing needs. In addition to this, the ethnic profile of the borough suggests that ‘culturally’ specific forms of violence such as forced marriage, ‘honour’ based violence and female genital mutilation are key issues for the borough, although these forms of violence, despite a vast increase in reporting through our coordinated approach, are not always well reported to local agencies.

In Tower Hamlets, over the past year alone, we have had 10 cases to the domestic violence MARAC where single women with no recourse to public funds have been referred. Women who are also victims of forced marriage or trafficking for the purposes of forced marriage have been forced to flee from abusive homes but have been unable to access any adequate accommodation. Some women have been supported to return to their countries of origin but this does not mean that they are necessarily safer and this is a real safety concern for us, especially as the numbers of women identified are increasing.

Table 2: High Risk Adult victims referred to MARAC by VAWG Strand from April 2014 – March 2015

Strand	Female	Male
Domestic Violence	382	31
Sexual Violence	83	3
Forced Marriage	2	0
So-called ‘honour’ based violence	6	2
Stalking & Harassment	143	12

¹⁴ Violence Indicator Profiles for England Resource (VIPER), available at: www.eviper.org.uk (last accessed 17.12.13)

¹⁵ Metropolitan Police Crime Mapping, available at: <http://maps.met.police.uk/tables.htm> (last accessed 11.01.16)

¹⁶ Metropolitan Police Crime Figures, available at: <http://www.met.police.uk/crimefigures/> (last accessed 11.01.16)

Dowry Related Abuse	0	0
Female Genital Mutilation	0	N/A
Prostitution/ Sexual exploitation	0	0
Trafficking	0	0

Note 1: The figures for domestic violence will sum to 100% as the main referral reason under the 2012 definition which includes all strands except Prostitution/Sexual Exploitation, Dowry related abuse (explicitly) and Trafficking.

Note 2: The figures for all strands apart from domestic violence have been monitored individually from June 2014 and were not previously disaggregated.

Note 3: Despite high numbers of cases to MARAC, this is not representative of the full numbers of victims of VAWG in Tower Hamlets due to underreporting or no recognition of abuse.

Note 4: No victim was referred explicitly on the basis of prostitution or exploitation. Although some victims had been sexually exploited, they were referred on the basis of domestic abuse.

LGBT

Research suggests that there are similar levels in LGBT relationships as in heterosexual relationships: here it is clear both men and women can be victims and perpetrators.¹⁷ In 2014/2015, there were 9 gay men, 2 bisexual women and 1 transgender man referred to the Domestic Violence MARAC.¹⁸

Disability

Research has consistently found that disabled women are twice as likely to experience domestic violence as non-disabled women are.¹⁹ The same research has shown that disabled men are also more at risk, although at a rate of about 1.5 times non-disabled men. In 2014/2015 there were 23 disabled victims (20 female and 3 male victims) referred to the domestic violence MARAC.

¹⁷ Donovan, C., Barnes, R. and Nixon, C. (2014) *The Coral Project: Exploring Abusive Behaviours in Lesbian, Gay, Bisexual and/or Transgender Relationships*, Interim Report September 2014, available at: http://www.rapecrisisScotland.org.uk/workspace/publications/Coral-Project-Interim-Report-Sept-2014_FINAL-VERSION2.pdf (accessed 13 July 2015); Bowen, E. and Nowinski, S. N. (2012) 'Partner violence against heterosexual and gay men: Prevalence and correlates', *Aggression and Violent Behavior*, volume 17 (1), pp36-52; Goldberg, N. & Meyer, 'Sexual orientation disparities in history of intimate partner violence results from the California Health Interview Survey', *Journal of Interpersonal Violence*, 28(5), pp.1109-1118.

¹⁸MARAC is the Multi-agency Risk Assessment Conference, which is a bi-monthly meeting where professionals meet to discuss, and safety plan high risk cases of domestic violence.

¹⁹ Khalifeh, H., Howard, LM., Osborn, D., Moran, P., Johnson, S. (2013) 'Violence against People with Disability in England and Wales: Findings from a National Cross-Sectional Survey', *PLoS ONE* 8(2); Chang, J., Martin, S., Moracco, K., Dulli, L., Scandlin, D., Loucks-Sorrel, M., Turner, T., Staroneck, L., Neal Dorian, P. and Bou-Saada, I., (2003) 'Helping Women with Disabilities and Domestic Violence: Strategies, Limitations, and Challenges of Domestic Violence Programs and Services' *Journal of Women's Health*, 12(7), pp. 699-708; Hague, G., Thiara, R., Magowan, P. and Mullender, A. (2008) *Making the Links: Disabled Women and Domestic Violence*, Bristol: Women's Aid; Thiara, R., Hague, G., Bashall, R., Ellis, B. and Mullender, A. (2012) *Disabled Women and Domestic Violence: Responding to the Experience of Survivors*, London: Jessica Kingsley Publishers; Coker, A., Smith, P. and Fadden, M. (2005) 'Intimate Partner Violence and Disabilities among Women attending Family Practice Clinics', *Journal of Women's Health*, 14(9), pp.829 -838; Mays, J. (2006) 'Feminist disability theory: domestic violence against women with a disability', *Disability and Society*, 21(2), pp147-158 and Mirrlees-Black, C. (1999), *Op. Cit.*, footnote 7, pages 32-33.

Children

Each year up to 750,000 children in the UK experience domestic violence.²⁰ Most children who live in families where there is abuse are aware of the abuse that has been taking place and a meta-analysis of research studies estimated that in 30 -60 percent of domestic violence cases, the abusive partner was also abusing children in the family meaning that it is the most serious safeguarding issue for children.²¹ Children's social care estimates that around 70-80% of all contacts to the Integrated Pathways and Support Team (IPST)/Multi-agency Safeguarding Hub (MASH) Team involve domestic abuse (using the wider definition). In 2014/2015 there were 467 children involved in the cases referred to MARAC.

Young People

The highest risk age for all forms of VAWG is those under the age of 24.²² In 2014/2015 there were 101 victims referred to MARAC aged 24 and under which represents almost a third of all victims. 17 of those victims were aged between 16 and 18.

Unmet need

We know that there is unmet need within our borough – both from people fleeing domestic abuse but also an increase in cases of No Recourse to Public Funds and complex needs cases. In many instances, these women are being turned away from refuge provision as there is no space. Research conducted by UK Refuges Online (UKROL) has shown that in the 18 months to March 2015, 21 women with no recourse to public funds were turned away from refuge provision in Tower Hamlets. We have also noted an increase in single women needing refuge provision who are BME with complex needs and are unable to be accommodated either because of a lack of specialist support or because they have no recourse to public funds. There is also a significant proportion of women who currently reside in Tower Hamlets who need to flee but who are unable to do so due to the numbers of children they have²³ or who have no recourse to public funds and are unable to be accommodated anywhere in London.

It is difficult for us to forecast how many refuge spaces will be needed in the future but we are anticipating a large increase due to a combination of welfare reform and also an increased awareness of professionals about complex needs and wider harmful practices, especially the highest needs cases.²⁴ We are also working across sectors, with drugs and alcohol services, mental

²⁰ DH (2002) *Women's Mental Health : Into the Mainstream*, London: Department of Health

²¹ Edleson, J (1999) 'Children Witnessing of Adult Domestic Violence', *Journal of Interpersonal Violence*, 14:4. For a detailed discussion of the impact of domestic violence on children see Hester et al (2007) op cit., Wolfe, D., Crooks, C., Lee, V., McIntyre-Smith, A., and Jaffe, P., (2003), 'The effects of children's exposure to domestic violence: a meta-analysis and critique', *Clinical Child and Family Psychology Review*, 6(3), Kitzmann, K., Gaylord, N., Holt, A. and Kenny, E., (2003), 'Child Witnesses to Domestic Violence: A Meta-Analytic Review', *Journal of Consulting and Clinical Psychology*, 71(2) and Evans, S., Davies, C. and DiLillo, D. (2008), 'Exposure to Domestic Violence: A meta-analysis of child and adolescent outcomes', *Aggression and Violence Behavior*, 13(2).

²² See for example: Schutt, N. (2006), *Domestic violence in adolescent relationships: Young people in Southwark and their experiences with unhealthy relationships*, London: Safer Southwark Partnership; Sugar Magazine Poll (2005); End Violence Against Women (EVAW) (2006) UK Poll of 16-20 Year Olds. November 2006. ICM; Barter, C., McCarry, M., Berridge, D. and Evans, K. (2009) *Partner exploitation and violence in teenage intimate relationships*, London: NSPCC and Beckett, H. et al (2012) *Research into gang-associated sexual exploitation and sexual violence: interim report*, Luton: University of Bedfordshire; Berelowitz, S. et al (2012) "I thought I was the only one. The only one in the world." *The Office of the Children's Commissioner's inquiry in to child sexual exploitation in gangs and groups: interim report*, London: Office of the Children's Commissioner and Child Exploitation and Online Protection Centre (CEOP) (2011) *Out of mind, out of sight: breaking down the barriers to child sexual exploitation: executive summary*, London: CEOP.

²³ 28% of households in Tower Hamlets have 3 or more children which has an impact for victims of VAWG in being able to access refuge provision. ONS (2013) 'Family Size in 2012', Newport, *Office for National Statistics*

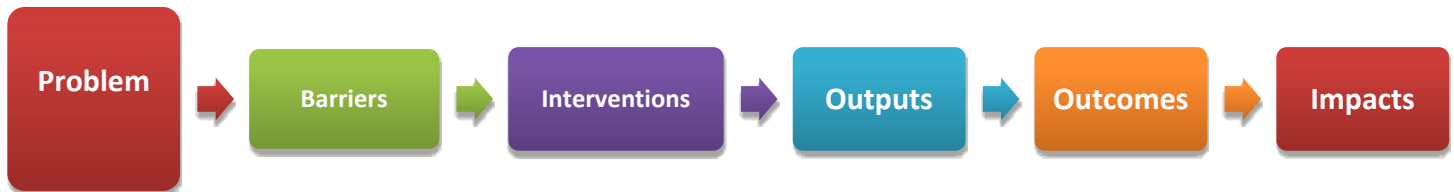
²⁴ There are currently 34 total bedspaces in Tower Hamlets. We have a specialist refuge for BME women and children with 4 family spaces (3 (3 for a woman and 2 children, 1 for a woman and 1 child) and 1 single room accommodating

health teams and the voluntary sector on supporting women with complex needs/multiple disadvantages who are also victims of VAWG and anticipate a large increase in need once the professionals across the borough are equipped with the knowledge about how to identify women at risk as we have seen with all awareness raising over the past 3 years. UKROL's report found that just over two-fifths (41.6%) of women (where n=208) presenting for refuge in Tower Hamlets are able to be accepted into the refuge, either due to lack of space or because of complex needs or NRPF.

19 in total. We also have provision for an additional 32 bedspaces with floating support. A further 72 women experiencing domestic abuse were accepted as homeless in the past 12 months (to October 2015).

Theory of Change

In developing our updated VAWG Strategy, we have applied a theory of change model to our current work on VAWG.²⁵ The model, which has been used since the late 1980s, is ‘a systematic and cumulative study of the links between activities, outcomes and contexts of the initiative’²⁶. The model has been used extensively in recent years by Department for International Development (DFID) to evaluate work in developing countries on VAWG²⁷ and the systematic review highlights both the successful outcomes of our existing VAWG work but also shows where there needs to be additional focus for our strategic approach moving forwards.



A Theory of Change (TOC) model is depicted as a linear model to be read from the bottom up (See below) but should not be interpreted as such given the complexity of VAWG. Using a linear outline enables the key milestones and concepts to be outlined which, when combined with a coordinated community response model highlights the need for better multi-agency, multi-sector working to tackle VAWG.

Stage 1: Problem

The base of the TOC model is the problem which is the overarching issue to be overcome in order to work towards a borough that is free from VAWG. In the case of Tower Hamlets, the problem is that gender-based violence violates the rights of women and girls in the borough and both constrains their choices and affects their ability to participate as equal actors in society.

Stage 2: Barriers

The next level in a TOC model is identification of key barriers. In Tower Hamlets, the key barriers to prevention, provision and protection are:

- Attitudes of members of the community that condone violence
- Need for continued and committed political will at a senior level to tackle VAWG
- Inadequate or inappropriate support for victims of VAWG
- Lack of awareness of VAWG amongst professionals that impacts on responses to victims
- Absence of prevention with younger people leads to concerning attitudes and impacts on future support needs of young women

²⁵ For information on using a theory of change for work on VAWG, please see: Fancy, K. and McAslan Fraser, E. (2014) *DFID Guidance Note on Addressing Violence Against Women and Girls (VAWG) in Education Programmes – Part A*, London: VAWG Helpdesk; Lindley, H. (2014) ‘Reflections on Womankind Worldwide’s experiences of tackling common challenges in monitoring and evaluating women’s rights programming’, *Gender and Development*, 22(2), pp. 271-289; Gains, F. and Lowndes, V. (2014) ‘How is Institutional Formation Gendered, and Does it Make a Difference? A New Conceptual Framework and a Case Study of Police and Crime Commissioners in England and Wales’, *Politics and Gender*, 10(4), pp.524-548

²⁶ Connell, J.P. and Kubisch, A. C. (1998) ‘Applying a Theory of Change Approach to the Evaluation of Comprehensive Community Initiatives: Progress, Prospects, and Problems’ in Fulbright- Anderson K, Kubisch A.C. and Connell J.P., (eds). *New approaches to evaluating community initiatives: theory, measurement, and analysis*. Washington, DC: Aspen Institute

²⁷ Our Theory of Change model is based on Lockett, K. and Bishop, K. (2012) *A Theory of Change for Tackling Violence against Women and Girls*, Violence Against Women and Girls: CHASE Guidance Note Series: Guidance Note 1, London: DFID

Stage 3: Interventions

Appropriate interventions address the key barriers and support the creation of an environment that facilitates work on VAWG and work with the whole community to tackle VAWG. The key interventions are outlined in the Coordinated Community Response which highlights our 6 strategic objectives designed to provide a long term solution to gender-based violence.

Stage 4: Outputs

Each intervention leads to a range outputs and each area is cross-cutting – for example, good quality prevention work can lead to better perpetrator accountability. Outputs are in essence the extremely short term outcomes of the interventions but which contribute towards an overall systems change. Examples of this include: Training 100 VAWG Champions who then deliver messages to 15 staff members each at a team meeting extending the reach to 1500 professionals in the borough.

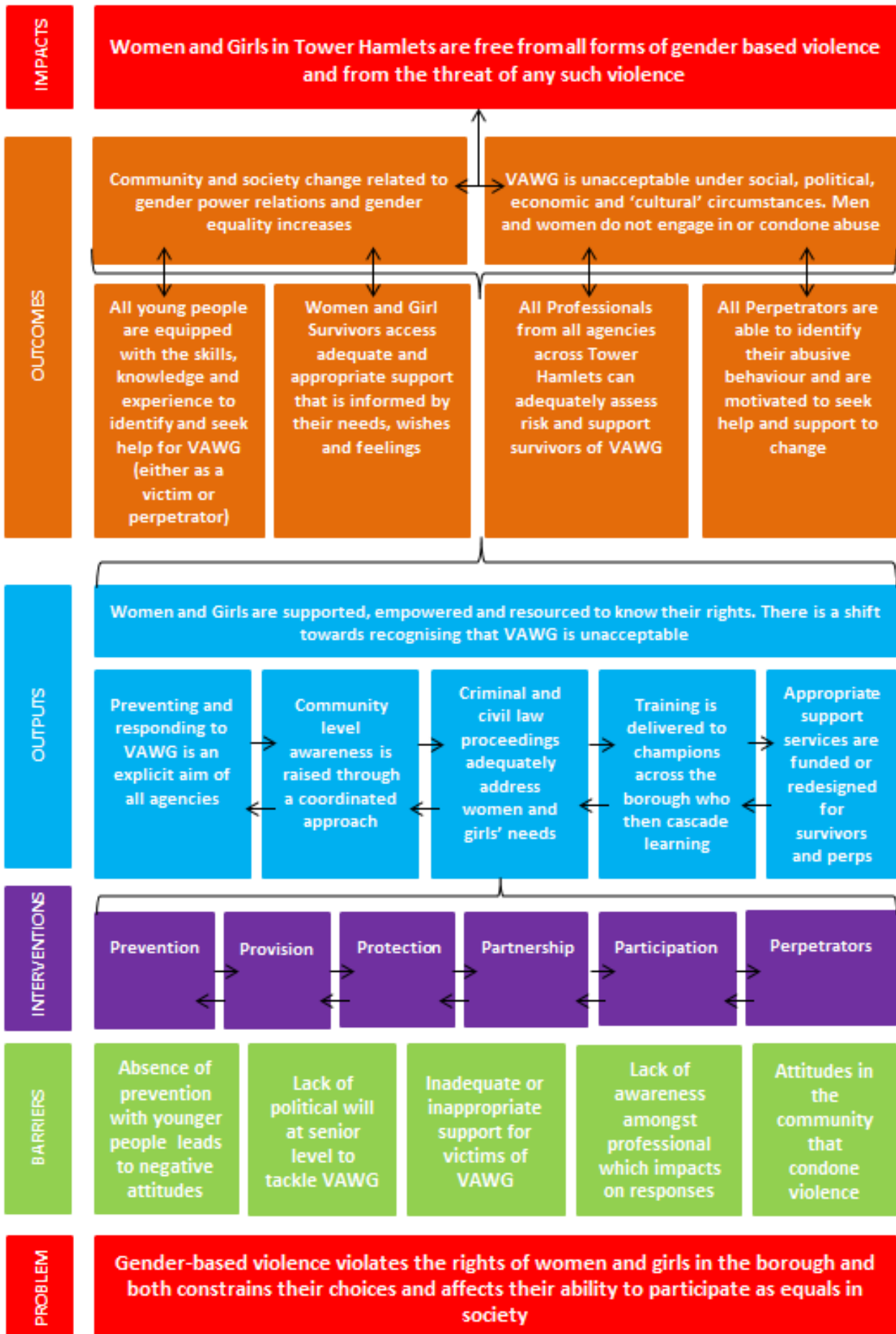
Stage 5: Outcomes

Given the linear depiction of the model – the outputs should lead to fulfilment of outcomes in a successful VAWG programme. Outcomes can be seen as the medium term successes the programme – a highlight of the areas that are recorded and monitored within our action plans and performance matrix (See Governance section, page 29)

Stage 6: Impacts

The key impact, the top of the TOC model or the area of change essentially tries to ensure that the problem established in Stage 1 has been addressed and eradicated. For a Tower Hamlets model that would be the achievement of our strategic vision for the borough where all women and girls are free from all forms of gender-based violence and from any threat of such violence.

Figure 1: VAWG Theory of Change Model



Strategic Approach

Evaluation of our current work and the findings of the VAWG consultation process to date has shown that we should continue to work towards a Coordinated Community Response (CCR) (See Appendix 2)²⁸ as we have been doing since 2013. A CCR approach to VAWG ensures that all relevant organisations effectively respond to these issues both within their own agencies and in collaboration with other partners to prevent harm, reduce risk and increase immediate and long-term safety for people across the borough. The approach recognises the cross-cutting nature of VAWG whereby it links to and impacts on a range of areas including: homelessness, drugs and alcohol misuse, child abuse, unemployment, crime and health. We recognise that VAWG impacts on all services across Tower Hamlets including community safety, housing, police, children and adult services, health, probation, criminal justice, civil courts, school, voluntary and community organisations and want to ensure that our approach is multi-agency and multi-faceted to tackle all areas.

We propose to use a 6P approach to develop the strategic priorities, ensuring that the learning from our work to date, as well as the theory of change model and CCR, are incorporated:

- **Strategic Priority 1: Prevention and Early Intervention**
- **Strategic Priority 2: Provision of Appropriate Support to Survivors**
- **Strategic Priority 3: Protection from Abuse**
- **Strategic Priority 4: Partnership working across Statutory and Voluntary Agencies**
- **Strategic Priority 5: Participation of victim/survivors to inform services**
- **Strategic Priority 6: Perpetrator Accountability**



²⁸ The CCR diagram has been adapted from Kelly, L. and Coy, M. (2012) *Action Plan for Addressing Violence Against Women and Girls in Thurrock*, London: CWASU, London Metropolitan University.

Strategic Priority 1: Prevention and Early Intervention

There is a growing recognition throughout research into prevention²⁹ that experiencing violence in their home lives or their own relationships can have a significant impact on young people's ability to participate fully in school life and achieve academically³⁰. Furthermore, children and young people are the next generation of potential victims and perpetrators of domestic abuse and wider forms of VAWG.

The current safeguarding legislation, policies, procedures and guidelines tend to be reactive, rather than proactive, yet by working with children and young people now; we can prevent VAWG in the future.

Based on recognition of the key importance of early intervention and prevention work with young people and the population profile of Tower Hamlets, whereby a fifth of the population is aged 16 and under as well as recognising the high levels of violence against young people in the borough coupled with the unhealthy attitudes that cause it, we have developed our young people programme to tackle VAWG.

However, working with schools and other youth settings is just one element of prevention. There is a need to embed longer term messages across the whole community through an integrated approach. The goal is to challenge attitudes that condone and underpin VAWG across the whole borough through a coordinated approach with all agencies.

Objective(s)

- All young people are aware of services available for support in the borough including specialist VAWG services for young people
- All young people are provided with an opportunity to become youth champions to provide peer support
- All young people received key messages about gender equality, human rights and respectful relationships
- Residents across the borough are provided with the opportunity to engagement with awareness raising sessions on VAWG
- Young people who have experienced or perpetrated abuse feel confident and supported to disclose and get support
- Young people understand what abuse looks like within the family, including harmful practices, and where to get support for disclosures
- Highlight the role that faith leaders, community champions and councillors can play in prevention and early intervention

²⁹ See for example: Phipps, A. and Smith, G. (2012) 'Violence Against Women Students in the UK: Time to take action', *Gender and Education*, 24(4) pp.357-373; De Koker, P., Mathews, C., Zuch, M., Bastien, S. and Mason-Jones, A. (2014) 'A Systemic Review of Interventions for Preventing Adolescent Intimate Partner Violence', *Journal of Adolescent Health*, 54(1) pp.3-13; Banos-Smith, M. (2011) *A Different World is Possible: Promising Practices to Prevent Violence Against Women and Girls*, London: EVAW and Stein, N. (undated) *Gender Violence in Elementary and Secondary Schools*, available at:

www.musc.edu/vaw/prevention/research/nan_stein.html (last accessed 16.04.14)

³⁰ Prevention work is also vital when working in other youth settings including: youth clubs; short-stay schools (formerly pupil referral units) and youth offending teams.

Actions

- Continued development of the 'whole school' approach programme (See Appendix 5) including work with parents
- Promoting and developing the 'youth campaign' and evaluation of prevention launch
- Work with the healthy lives team to ensure VAWG is embedded within health
- Promoting specialist support services that provide therapeutic, emotional and psychological support to young people across the borough in mainstream education and other youth provision
- Additional development of the youth champion programme to ensure access to peer support
- Creation of a network of community champions to support local communities
- Development of a public awareness raising communications plan that supports key dates on an annual basis – '16 Days of Action', Zero tolerance to FGM, CSE Awareness Day etc.
- Distribution of the youth VAWG leaflet to all youth settings in the borough
- Continued community engagement with BME organisations and communities, especially around 'harmful practices'.

So to address that issue, I mean you can't get them one-on-one. Some boys don't have their parents to look up to when it comes to talking about sexual matters. So when you talk about having 'the talk' I mean, none of us had 'the talk' because we come from a certain background or certain family where that kind of stuff is not usually talked about. And a lot of the boys come from similar backgrounds. I mean the majority do. I don't know if that's changing or not. From what I can tell I don't think it is. Now if no one's addressing these issues, regardless of it being a success or failure, now the boys go out when they do need to find such information. They'll be listening to such music and they'll be watching certain movies and so on and so forth and then all their information will come from that, and that's not good.

[Consultation with Bow Boys' School]

Education is the way forward for everything, whether it's to address racism or sexism. Education is the key; you have to root it into their minds when they're young. So they grow up to believe it's the right way rather than them being fed [sic] the opposite information from a young age.

[Consultation with Bow Boys' School]

Strategic Priority 2: Provision of Appropriate Support to Survivors

Research has shown that specialist and non-specialist, formal and non-formal support can improve health and safety outcomes and are vital to help survivors rebuild their lives. What is highlighted is the need for individualised, appropriate support that is developed with the survivor and meets their needs.³¹ (See Appendix 6 for Person Centred Approach diagram)

The key for provision is to help women and girls to continue with their lives through effective provision of services - specialist services and support, emergency and acute services and universal services.

Objective(s)

- Provide empathetic specialist and non-specialist support services for all victims of VAWG in Tower Hamlets
- Services in Tower Hamlets promote empowerment for survivors to move on from the abuse they have suffered
- Services in Tower Hamlets provide individualised support packages
- Ensure equal and fair access to services for all survivors regardless of age, sexuality, disability, ethnicity, religion or sexuality
- Ensure services are equipped with the skills, knowledge and experience to support the most vulnerable victims, including older women, those with disabilities, those experiencing multiple disadvantages and those with No Recourse to Public Funds (NRPF)
- Ensure services can respond effectively and appropriately to LGBT victims of VAWG
- Maintain and develop provision of services through internal and external funding
- All agencies are aware of the importance of respecting and advocating the views and opinions of the service user (where appropriate).
- VAWG survivors are supported to make informed choices about the VAWG services they receive and feel that their needs are fully recognised.
- Increasing the extent to which victims of violence feel well supported by agencies, including measuring key outcomes
- Increase victim satisfaction at court

Actions

- Continued provision of specialist services across all areas
- Publicising and promoting additional pan-London or cross-borough provision of services
- Improved communication and accessible information about services to victims through champions' programmes
- Creation of safe spaces for survivors to disclose, working with key locations across the borough
- Continue to support and promote the Domestic Violence IRIS model³²

³¹ See for example: Evans, M. and Feder, G. (2015) 'Help-seeking amongst women survivors of domestic violence: a qualitative study of pathways towards formal and informal support', *Health Outcomes*; Jenson, R., Peterson-Beese, J., Fleming, L., Blumel, A. and Day, A. (2015) 'Accessibility and Responsiveness Review Tool: Community Agency Capacity to respond to survivors with disabilities', *Faith and Community Health*, 38(3), pp. 206-215 and Rehman, Y., Kelly, L. and Siquiqui, H.(eds) (2013) *Moving in the Shadows: Violence in the lives of minority women and children*, Surrey: Ashgate.

³² IRIS or Identification and Referral to Improve Safety is a training and support programme targeted at primary care clinicians (primarily GPs) and administrative staff to improve referral to specialist domestic violence agencies and record identification of women experiencing abuse. In Tower Hamlets, IRIS is funded by Public Health and the CCG to work with all GP practices across the borough and is commissioned to Victim Support.

- Continue to support and promote the East London Rape Crisis Service
- Publicising and promoting redeveloped referral pathways and training through established awareness raising programmes
- Continued development of the 'One Stop Shop' providing wrap-around support for VAWG survivors by a number of key agencies to enable multiple needs met to be met under one roof.
- Continued provision of a multi-agency training programme which covers all strands of VAWG
- Improved responses for older women working in conjunction with adult services
- Work with partners to ensure all VAWG multi-agency guidelines are embedded into each service area
- Improving responses for child to parent violence and elder abuse including learning and recommendations from DHRs and Serious Case Reviews.
- Review and development of the VAWG Champions programme to ensure that there is representation from each agency working explicitly or implicitly on VAWG across the borough
- Ensuring information about help seeking and support is provided in locations across the borough, including at Third Party Reporting Centres.

"As someone who has needed specialist services in the past, it's really important that the services are maintained. Every day you hear about services closing or the numbers of people who are turned away. I think even during austerity we need to keep the provision of services at the same or even higher level"

"Provision of appropriate services leads to or creates access to the other priorities"

Strategic Priority 3: Protection from Abuse

A strategic approach to protection must cover all aspects of protection – that is protection must be available across all strands of VAWG and be accessible to all victims.³³ Protection covers both short term and long term protection: immediate safety as well as prevention and early intervention to stop abuse before it starts as well as longer term safety. As Coy *et al* have stated ‘Protection is not just about immediate safety but also a deeper sense of safety and human security.’³⁴

Provision of appropriate high quality support through specialist support services is a key route to protection as they are adept in providing crisis intervention (short term protection) and also longer term emotional and practical support to enable survivors to remain safe.

As MOPAC has highlighted, Domestic Homicide Review research has shown that often victims are not known to statutory services but neighbours and other services may have some awareness.³⁵ Research conducted by ROTA into girls affected by violence has also highlighted the difficulty in disclosing to statutory services and that often young people in particular fear that professionals are not adequately equipped to deal with disclosures.³⁶ Additionally, research into disclosure of VAWG over the past ten years has shown that often victims will disclose to friends, family and community members rather than to services.³⁷ Taking this all together further emphasises the need to protect victims through engagement across the community.

Objective(s)

- Survivors feel confident in reporting VAWG and taking police action against perpetrators (where appropriate)
- Embed multi-agency and VAWG work into each team’s training including police, children’s social care, housing, adults’ social care and health
- Ensure all agencies are aware of their role in protecting survivors of VAWG
- Empower the community to protect their friends and family members
- Faith based organisations are engaged and supported to support victims of VAWG
- Embed VAWG awareness into all safeguarding training

³³ See for example: Garcia-Moreno, C., Hegarty, K., Lucas D’Oliveira, A., Koziol-Maclain, J., Colombini, M. and Feder, G. (2014) ‘The health-systems response to Violence against Women’, *Violence Against Women and Girls Briefing Paper 2*, November 21st 2014; Patterson, D. and Tringall, B. (2014) ‘Understanding how advocates can affect sexual assault victim engagement in the criminal justice process’, *Journal of Interpersonal Violence*, 30(12) pp. 1987-1997; McGarry, J., Simpson, C. and Hinsliff-Smith, K. (2012) ‘Safeguarding and Domestic Abuse: An Intersection for Future Policy and Practice Development’, *Journal of Care Services Management*, 6(4) pp156-160 and Jewkes, R. (2014) *What works to prevent violence against women and girls: Evidence review of the effectiveness of response mechanisms in preventing violence against women and girls*, Annex H., London: DFID

³⁴ Coy, M., Lovett, J. and Kelly, L. (2008) *Realising Rights, Fulfilling Obligations: A Template for an Integrated Strategy on Violence Against Women for the UK*, London: End Violence Against Women (EVAW) Coalition

³⁵ MOPAC (2013) *Mayoral Strategy on Violence Against Women and Girls*, London: Mayor’s Office for Policing and Crime, p.21

³⁶ Firmin, C. (2010) *Female Voice in Violence Project: A Study into the Impact of Serious Youth and Gang Violence on women and girls*, London: Race on the Agenda (ROTA) and Firmin, C., (2011) *‘This is it. This is my life...’: Female Voice in Violence Final Report*, London: ROTA

³⁷ See for example: Hagemann-White, C. and Bohn, S. (2007) *Protecting Women Against Violence: Analytical Study on the Effective Implementation of Recommendation on the Protection of Women Against Violence in Council of Europe Member States*, Strasbourg: Council of Europe and Kelly, L. (2005) ‘Inside outsiders: Mainstreaming violence against women into human rights discourse and practice’ *International Feminist Journal of Politics*, 7(4)

Actions

- Development of services for victims that are appropriate to needs and level of risk
- Partnership working with police to implement measures including DVPOs, DVPNs and measures to tackle FGM, Forced Marriage and Harmful practices
- Work closely with the SDVC and family courts to improve survivor access to justice
- Development of Third Party reporting centres to support disclosures from victims unable to access specialist services
- Continued development of MARAC to support wider forms of VAWG
- Continued provision of IDVAs and Violent Crime Caseworkers
- Continued provision of the Sanctuary scheme to ensure victims can be protected to remain in their own homes safely
- Development of 'Safe havens' for victims to be protected on a short term basis
- Continued development of the community and professional VAWG Champions programme to ensure that victims can feel empowered to disclose abuse
- Ensure that safeguarding procedures include all VAWG referral pathways and procedures, ensuring professionals and victims are aware about how to access support to signposting.

Strategic Priority 4: Partnership working across Statutory and Voluntary Agencies

The benefits and potential pitfalls of multi-agency working to tackle VAWG have long been recognised with the overarching conclusion that despite differences in working practices, a coordinated approach works best for survivors.³⁸

Working in partnership is key to delivering effective VAWG work in Tower Hamlets. No one agency can be responsible for our vision of ending gender based violence. Work in partnership will ensure that we can obtain the best possible outcomes for victims in Tower Hamlets including agreeing and achieving consistent services.

Objective(s)

- Improve and increase joint working to ensure more work with less funding
- Strengthen relationships between services
- Ensure VAWG outcomes embedded into other service areas and organisations
- Strengthen relationships between specialist VAWG services and children's and adults' social care to prevent VAWG in the future and support families
- Recommendation and support for agencies commissioning VAWG services to ensure a consistent response across the borough
- Develop improved data monitoring across services to accurately record VAWG outcomes
- All professionals understand safeguarding and referral mechanisms for all strands of VAWG and can identify risk and need
- Ensuring senior level buy-in and commitment from across statutory and voluntary organisations in the borough to embed work on VAWG
- Ensuring survivors of VAWG are viewed as key partners in all approaches

Actions

- Improve referral pathways across services in the borough ensuring that all professionals are aware of risk and referral mechanisms in Tower Hamlets
- Continued development of multi-agency training programmes available to all professionals in the borough
- Work with partners to embed local, national and international campaigns
- Continued development of the VAWG champions programme to cascade information and training
- Development of a 'Train the trainers' programme for VAWG Champions, including guidance on legislation and policy
- Incorporate any learning from Domestic Homicide Reviews (DHRs) and Serious Case Reviews (SCRs) to increase best practice working across agencies
- Development of Good Practice Guidelines for professionals on dealing with VAWG
- Continued partnership and engagement with schools to embed work on VAWG across the 'whole school'
- Coordinate approaches across different service areas related to VAWG – for example the linkages between grooming for sexual exploitation and extremism under PREVENT

³⁸ Robinson, A. (2006) 'Reducing Repeat Victimization Among High-Risk Victims of Domestic Violence: The Benefits of a Coordinated Community Response in Cardiff, Wales' *Violence Against Women*, 12(8), pp.761-788; Wills, A. with Jacobs, N., Montique, B. and Croom, L. (2011) *Standing Together Against Domestic Violence: A Guide to Effective Domestic Violence Partnerships*, London: Standing Together

- Review membership of multi-agency forums including DV forum, MASE etc. to ensure adequate and active participation and representation from all agencies
- Update the Domestic Violence directory to ensure that all VAWG services are included

“The key for me is multi-agency working and skilling up all professionals to address VAWG. I feel like there could also be work done on spaces where people are likely to disclose - friends and family, medical context. While the focus on police and reporting is important this does not reflect how survivors access help”

“If there’s more focus on partnership working, agencies can provide support and information to victims and collectively work together to provide skills to prevent violence and protect victims”

Strategic Priority 5: Participation of victim/survivors to inform services

*The involvement of...survivors is clearly a difficult and sensitive issue, however, and needs to be carried out not just as a formality, but as a process which has practical effects and which leads to policy change and action.*³⁹ Research has shown that it is crucial to recognise that survivors' voices are fundamental to ensuring that services commissioned to work on VAWG, and indeed any approach to tackle VAWG, are successful.⁴⁰ Tower Hamlets firmly support this approach – our VAWG approach could not be successful without real input from survivors. Our approach is not just survivor-centred but also survivor-led acknowledging that they are the experts in their own empowerment and recovery from abuse.

Objective(s)

- Ensure that the voices of survivors input into all work on VAWG
- Develop an SVIP Model of Survivor engagement⁴¹
- Reduction in costs to services of providing inappropriate services and programmes for survivors

Actions

- Development of continued feedback mechanisms to monitor VAWG outcomes
- Continued development of the Community Champions programme to allow survivors to participate in VAWG work.
- The community are made aware that Tower Hamlets is a place that does not tolerate VAWG and can support friends, family and neighbours to access services
- Development of community engagement mechanisms on VAWG through projects and programmes
- Utilise spaces for community engagement to consult residents to feel more supported to disclose
- Young survivors encouraged to get support and discuss VAWG in safe spaces
- Development of training and leaflets informed by survivors' experiences
- Work towards development of a peer support scheme for survivors including training through the community champions' programme to provide group and one-to-one support
- Review policies, procedures and services to ensure that they are open to survivors participation and input
- Survivors to partner with existing services to access schools' and parent groups
- Facilitate bi-annual survivor workshops to ensure that consultation informs policies and actions within the VAWG Strategy (See Governance Section p.29)
- Ensure that the SDVC satisfaction surveys are utilised to ensure that victims accessing court are best supported

³⁹ Skinner, T., Hester, M. and Malos, E. (2013) *Researching Gender Violence*, London: Routledge, p.163

⁴⁰ See for example: Kulkami, S., Bell, H. and McDaniel Rhodes, D. (2012) 'Back to Basics: Essential Qualities of Services for Survivors of Intimate Partner Violence', *Violence Against Women*, 18(1) pp. 85-101; Hague, G. and Mullendar, A. (2006) 'Who listens? The Voices of Domestic Violence Survivors in Service Provision in the UK', *Violence Against Women*, 12(6) pp. 568-587

⁴¹ The Survivors' Voices Inclusion Project (SVIP) Model of survivor engagement is a tool to meaningfully engage women survivors of abuse and violence in the work to end violence against women developed in Canada. The goal is to improve access and quality of services for women and children transitioning to violence free lives.

Strategic Priority 6: Perpetrator Accountability

Research into effective work with perpetrators to change and reduce rates of VAWG has consistently shown that a multi-pronged approach to support works best – an approach that provides criminal justice interventions coupled with support for perpetrators to change their behaviour.⁴² In the wider context of VAWG, perpetrators can be both intimate partners but also wider family members, especially in cases of ‘harmful practices’ where they are often carried out by wider family members and with collusion from the community. Tower Hamlets wants to move to an approach where perpetrators are held accountable by a range of interventions that decrease risks to victims and their wider family members, provide appropriate penalties, provide clear messages that abuse is not acceptable and provide specialist support to identify and change behaviour

Objective(s)

- Ensure that family mediation is not seen as a solution to ‘family violence’, especially in the context of so-called ‘honour’ based violence or forced marriage
- Improve responses to perpetrators with multi-disciplinary working in multi-agency to combine skills, knowledge and experience
- Increase in reporting of incidents to police and to other statutory services
- Increase in the percentage of successful criminal justice outcomes for survivors especially through the Specialist Domestic Violence Court (SDVC)
- Develop processes to address young perpetrators and female perpetrators
- Ensure linkages between perpetrator and family services are strengthened to ensure more effective multi-agency working around perpetrator accountability.
- Identify positive male role models to support young men around masculinity to prevent perpetrators in the future

Actions

- Perpetrators are given an opportunity to change their behaviour through a coordinated approach between services
- Focus on work with young people to challenge future perpetrators
- Development of training for all services on how to appropriately work with perpetrators and identify risk
- Work with professionals to avoid ‘charm bias’ of perpetrators, especially in family court and child protection proceedings
- Specialist support for perpetrators to prevent future victimisation
- Develop appropriate and considered criminal justice initiatives that place onus on perpetrators rather than victims to change behaviour
- Development of multi-agency working protocols between agencies around perpetrators who have been convicted of offences relating to VAWG, in order to keep the survivor safe
- Increase the focus on prevention through the ‘whole school’ approach (See Strategic Objective 1) to develop work on gender equality and address privilege

⁴² See for example: Brooks, O., Burman, M., Lombard, N., McIvor, G., Stevenson-Hastings, L. and Kyle, D. with assistance from Thomazi, A., (2014) *Violence Against Women: Effective Interventions and Practices with Perpetrators – A Literature Review*, Scotland: The Scottish Centre for Crime and Justice Research, Report No. 05/2014 and Westmarland, N., Thorlby, K., Wistow, J. and Gadd, D. (2014) *Domestic violence: evidence review*, N8 Policing Research Partnership

- Deliver and/or support training for criminal justice agencies, including magistrates and district judges

“We have to prosecute offenders to show we are serious about not tolerating VAWG. The only way we are really addressing it is in the long term i.e. for future generations.”

“It’s vital for us to support perpetrators to change rather than just going down the criminal justice route. For me, the key element is ensuring that perpetrators of all forms of abuse are given information on their behaviour and an opportunity to change”

Governance of the VAWG Strategy

The VAWG Strategy 2016-2019 will fall under the governance of the VAWG Steering Group which was set-up in 2014 with senior representation from statutory, voluntary and community organisations working to tackle VAWG. The VAWG Steering Group is a subgroup of the Community Safety Partnership (CSP). Domestic abuse continues to be a separate subgroup and is responsible to the multi-agency Domestic Violence Forum. Prostitution is also a separate strand of the CSP but also falls under the auspices of the VAWG Steering Group and elements fall under the ASB subgroup. Child Sexual Exploitation continues to be the responsibility of the Local Safeguarding Children Board (LSCB). There is sideways accountability for the remainder of the VAWG strands to the Health and Wellbeing Board (HWB).

The VAWG Steering Group will:

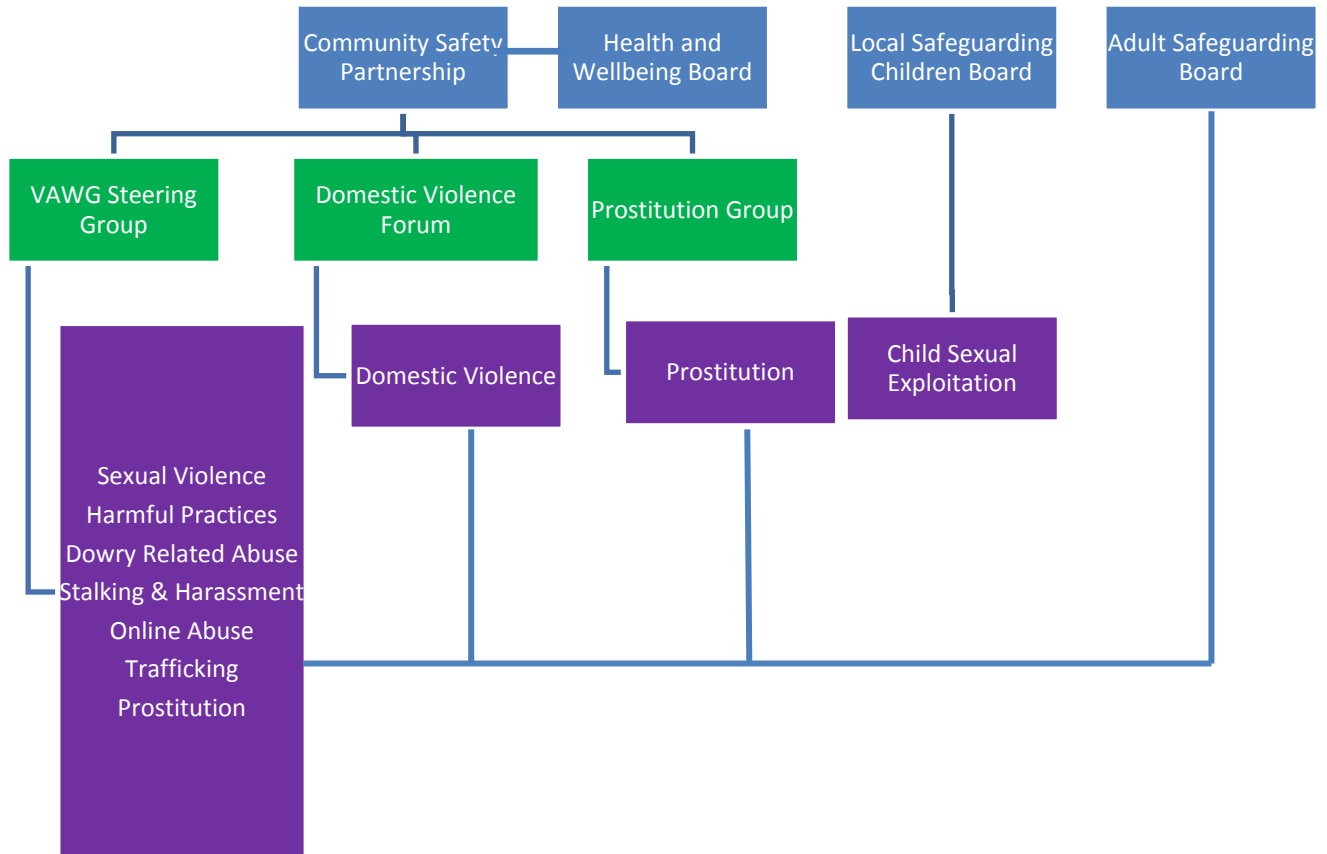
- Set and monitor the targets within the VAWG performance matrix and assess whether outcomes are being met
- Report quarterly to the CSP and provide reports on indicators for the Strategic Assessment on an annual basis
- Ensure learning from Domestic Homicide Reviews, including relevant recommendations, are incorporated into VAWG actions
- Promote multi-agency working across all sectors to ensure VAWG is included in all business areas
- Ensure survivors' voices and experiences are reflected throughout the VAWG Strategy and action plans
- Ensure any new policy, practice or legislation is fully included within the VAWG performance matrix and is embedded in all VAWG work across the borough

Objectives of the VAWG Steering Group

- Strategic oversight of VAWG Action Plans
- Reducing duplication of effort, and providing greater efficiency and consistency
- Improving accountability and ensuring quality assurance
- Better communication and transparency amongst agencies
- Improving sharing of good practice and lessons learnt
- Providing long term direction and vision for the area, including prioritisation of workstreams
- Performance management
- Identifying and resolving area wide issues
- Monitoring and reviewing voices of survivors of all forms of VAWG

The VAWG Steering Group is chaired by the Head of Community Safety and membership includes senior officers from: Police; Children's Social Care; Adults' Social Care; Public Health; Mental Health; Supporting People; Housing; Health; Youth and Community Services; Probation and Specialist VAWG organisations.

VAWG Governance Structure



Action Plans

Individual strands or combined areas (namely harmful practices which includes forced marriage, so-called ‘honour’ based violence and female genital mutilation) have action plans which are monitored on a regular basis. FGM also has a cross-borough Action Plan which is developed and monitored by the North East London FGM Group. There is also an overarching performance matrix which is overseen by the VAWG Steering Group, as outlined above, on a quarterly basis. Each action plan and the performance matrix are reviewed and evaluated on an annual basis.

Survivor Input

Initial evaluation of the VAWG Plan (2013-2016) and results from the consultation process highlighted the need for more explicit survivor input into the VAWG Strategy. As a result a VAWG survivor group will be established to ensure that robust consultation informs policies and action plans relating to the VAWG strands. The group will meet at least bi-annually, with the first group in April 2016.

Measuring Success

As with all strategic areas of systemic change, many of the changes in VAWG are long term outcomes. However, as can be seen from the 'Theory of Change' model, there are short term 'wins' that can have a real impact. We are currently evaluating that work of our first VAWG Plan (See page 6 for highlights) and have already seen a real shift in partnership working, training and awareness over the past three years. The coordinated community approach has meant that there has been a big increase in reporting and in cases being identified as VAWG. We view this as a positive as more victims are being supported and hopefully, in conjunction with the other strategic objectives, will mean that we will see a decrease in VAWG in the future until we reach our ultimate goal of eradicating gender-based violence in Tower Hamlets.

Outcomes

The key outcomes of the VAWG Strategy will be developed and monitored by the VAWG Steering Group as outlined above. The RAG rated performance matrix is monitored and reviewed on a quarterly basis.⁴³ The aim is not to duplicate the work of any one agency represented but to have a streamlined approach to measuring outcomes.

Data measurement

Again data measurement will not be the responsibility of one agency. The overarching aim of the VAWG Strategy is to improve multi-agency working and accountability and data will be measured across the partnerships by both commissioned services as part of their SLA and through other services on a voluntary basis.

Ongoing needs assessment

Ongoing needs assessment will be conducted in conjunction with the survivor group above as well as collectively through the Joint Strategic Need Assessment (JSNA) conducted by Public Health. We will also use other local, national and international evidence to assess areas that need to be re-designed or developed.

Reporting and accountability

Most of the elements of delivery will be reported to the VAWG Steering Group (the DV forum in the case of DV and the LSCB CSE Subgroup in the case of CSE) on a quarterly basis. Some outcomes will be reported to the Community Safety Partnership on a quarterly basis and to the Strategic Assessment on an annual basis. Performance and activity are also monitored on an annual basis through the Strategic Assessment which assesses the subgroup's performance against strategic priorities set by the CSP.

Overall accountability, as outlined above, will be to the Community Safety Partnership with sideways accountability to the Health and Wellbeing Board.

⁴³ The performance matrix is RAG rated on a quarterly basis. The version outlined in this strategy does not include the RAG rating but can be provided on request for the previous two quarters.

Appendix 1: Definitions of the VAWG Strands

Sexual Violence and Abuse

The World Health Organization (WHO) has defined sexual violence as “any sexual act, attempt to obtain a sexual act, unwanted sexual comments or advances, or acts to traffic, or otherwise directed, against a person’s sexuality using coercion, by any person regardless of their relationship to the victim, in any setting, including but not limited to home and work.”⁴⁴ It includes rape, sexual assault, sexual harassment/ bullying, sexual exploitation (coercion and exploitation in the sex industry), and trafficking.

Domestic Violence and Abuse

The cross-Government definition of domestic violence was changed in September 2012 (and was implemented in March 2013). The definition was widened to ‘domestic violence and abuse’ and also to include those aged 16-17 and coercive control for the first time.

The definition of domestic violence and abuse now states:

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:

- *psychological*
- *physical*
- *sexual*
- *financial*
- *emotional*

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

This definition, which is not a legal definition, includes so-called ‘honour’ based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

So-called ‘Honour’ Based Violence

So-called ‘honour’ based violence is a term used to describe violence committed against a woman where her family or the community feels that she has not followed what they believe is acceptable behaviour and has brought dishonour or shame to the family. It is based on the belief that women are commodities and the property of male relatives and women’s bodies are the repositories of the family’s honour.⁴⁵

⁴⁴ WHO (2002) *World Report on Violence and Health*, Geneva: World Health Organization, page 149

⁴⁵ For a wider discussion of so-called ‘honour based violence see: for example: Brandon, J. and Hafez, S., (2008), *Crimes of the Community: Honour-Based Violence in the UK*, London: Centre for Social Cohesion; Watts, C. and

Forced marriage

'A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.'⁴⁶

Female genital mutilation (FGM)

Female genital mutilation (FGM) comprises "all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons."⁴⁷

Prostitution, Trafficking and Exploitation

Women are forced, coerced or deceived to enter into prostitution and/or to keep them there. Trafficking involves the recruitment, transportation and exploitation of women and children for the purposes of prostitution and domestic servitude across international borders and within countries ('internal trafficking').

Child Sexual Exploitation

Child sexual exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.⁴⁸

Sexual harassment and sexual bullying

Sexual harassment is usually defined as any unwanted sexual attention, requests for sexual favours or unwanted verbal or physical behaviour of a sexual nature. It can take many forms including sexually explicit remarks, flashing, obscene and threatening calls and online harassment. It can take place anywhere, including the workplace, schools, streets, public transport and social situations.

Stalking and Harassment

Although harassment is not specifically defined it can include '*repeated attempts to impose unwanted communications and contacts upon a victim in a manner that could be expected to cause distress or fear in any reasonable person.*'⁴⁹ Again, there is no strict legal definition of stalking but the Protection from Harassment Act (as amended by the Protection of Freedoms Act 2012) sets out what examples of what can constitute stalking: physical following; contacting, or attempting to contact a person by any means (this may be through friends, work colleagues, family or technology); or, other intrusions into the victim's privacy such as loitering in a particular place or watching or spying on a person.

Zimmerman, C. (2002), 'Violence against women: global scope and magnitude', *The Lancet*, 359; Welchman, L. and Hossain, S. (2005), *'Honour': Crimes, Paradigms, and Violence against Women*, London, Zed Books and Terman, R. (2010), 'To specify or single out: Should we use the term "Honor Killing"?', *Muslim World Journal of Human Rights*, 7(1)

⁴⁶ FCO and Home Office (2015) 'Forced Marriage', available at: <https://www.gov.uk/guidance/forced-marriage> (last accessed 24.02.16)

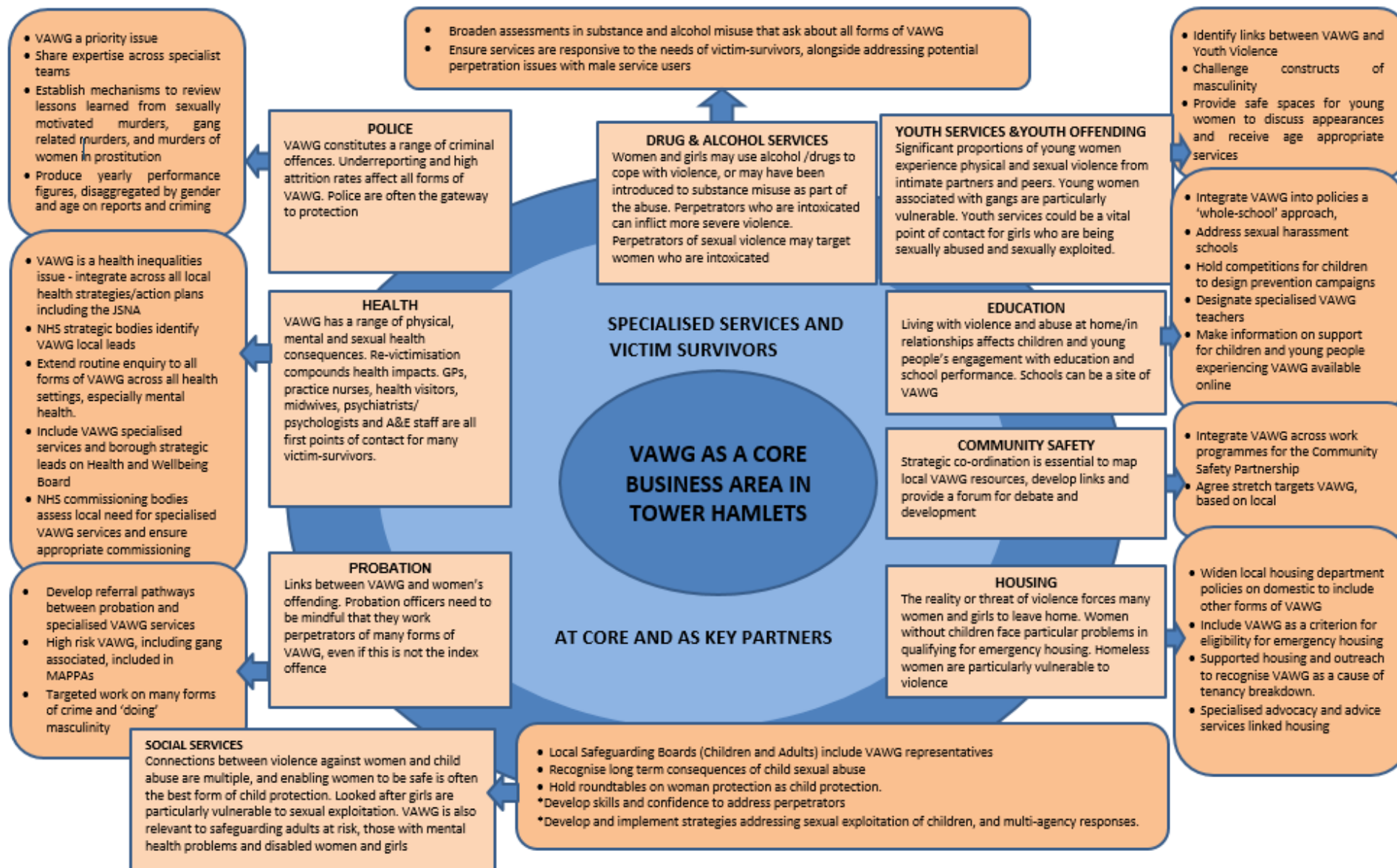
⁴⁷ WHO, (2010), Female Genital Mutilation, World Health Organization Fact Sheet No. 241, available at: <http://tinyurl.com/lvsjl> (last accessed 24.02.16)

⁴⁸ NSPCC, 'Child Sexual Exploitation', available at: <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-exploitation/what-is-child-sexual-exploitation/> (last accessed 24.02.16)

⁴⁹ CPS (2012) *Stalking and Harassment: Guidance for Prosecutors*, London: Crime Prosecution Service

Appendix 2: Coordinated Community Response to VAWG

TRAIN FRONT LINE PROFESSIONALS ON HOW TO IDENTIFY AND RESPOND TO ALL FORMS OF VAWG



ACTIVELY PARTICIPATE IN LOCAL MULTI-AGENCY PARTNERSHIPS

Appendix 3: Consultation Log

We started our consultation process in October 2015 and continued until February 2016 to ensure that we could consult with as many people as possible. The consultation methodology is varied to allow for different stakeholders to contribute to our Strategy. A consultation questionnaire was launched in October and individual meetings and focus groups started in November 2015. (A paper version of the questionnaire is also available). As outlined above, a report on the consultation is available for perusal.

Table 3: Consultation Timeline

Action	Date
Launch of VAWG Consultation Questionnaire	October 2015
16 Days of Action	November 2015
Interviews with key stakeholders	November 2015 – February 2016
SMT	December 2015
DMT	February 2016
VAWG Steering Group	January 2016
DV Forum	January 2016
Community Safety Partnership	January 2016 (final presentation April 2016)

A Stakeholder analysis was conducted to ensure that the correct agencies have been consulted. Consultation with a range of key professionals from the agencies listed in Table 4 will continue until end February.

Table 4: Key Stakeholders

Stakeholder	VAWG Strand
'A' Team Arts	All
Barts Health NHS Trust (community and acute services)	All
Citizens Advice	All
City Gateway	All
Community Mental Health Teams	All
Community Safety Partnership members	All
Domestic Violence and Hate Crime Team	All
Domestic Violence Forum	All
East London Foundation Trust	All
East London Harmful Practices Steering Group	Harmful practices
East London Rape Crisis	All, especially sexual violence and 'harmful practices'
Faith Regan Foundation	All
Head Teachers	All
Hestia	All
Hostel Providers	All
LBTH Adults' Safeguarding Board	All
LBTH Adults' Social Care	All
LBTH Attendance and Welfare Service	All
LBTH Children's Centres	All

LBTH Children's Safeguarding Board	All
LBTH Children's Social Care	All
LBTH Domestic Violence Team Services –The MARAC Steering Group, the LBTH 'One Stop Shop', the Homeless Person's Unit (HPU) drop-in service and the Barkantine Medical Centre	All
LBTH Housing Department – Housing Options and Support Team (HOST) and Homeless Families Service	All
LBTH IARP (Identify, Assess, Referral Programme)	All, especially prostitution and sexual violence
LBTH Idea Stores	All
LBTH MASE Group	CSE
LBTH Parent and Family Support Service	All
LBTH Public Health	All
LBTH Supporting People	All
LBTH THEOs	All
LBTH Youth Offending Service	All
LBTH Youth Services	All
London Black Women's Project (formerly Newham Asian Women's Project)	All
London Fire Brigade	All
London Muslim Centre and Maryam Centre	All
Look Ahead	All
Mayor's Office for Policing and Crime (MOPAC)	All
Metropolitan Police	All
NIA Project	All
North East London FGM Group	FGM
NSPCC Protect and Respect	Child Sexual Exploitation and Sexual Violence
Ocean Somali Community Association	All, especially FGM
Open Doors	All, especially Prostitution and Sexual Violence
Partnership for Ending Harmful Practices (PEHP)	All, especially harmful practices
PRAXIS	All
Probation (Community Rehabilitation Company and National Probation Service)	All
Registered Social Landlords	All
Step Forward	All
The Haven	Sexual Violence
The Specialist Domestic Violence Court (SDVC)	All
Tower Hamlets Volunteer Centre	All
TV Edwards	All
VAWG Champions	All
VAWG E-Group Members	All
VAWG Steering Group members	All
Victim Support	All
Women's Health and Family Services	All, especially FGM
'A' Team Arts	All

Consultation Report: Executive Summary

Introduction

Violence against women and girls issues form part of our local partnership approach to improving safety in the borough. Tackling VAWG is a priority within the 2015 Community Plan's *A Safe and Cohesive Community* strand.⁵⁰ Currently the oversight of violence against women and girls initiatives sits within the Community Safety Partnership (CSP) with sideways accountability to the Health and Wellbeing Board (HWB). Leadership locally is provided by the Community Safety Partnership.

Tower Hamlets has had a Domestic Violence Team for over 15 years and a specific action plan for at least 10 years, aimed at tackling domestic violence against anyone who is experiencing abuse. In 2013, the borough launched an additional strategy, the Violence Against Women and Girls (VAWG) Plan, aimed at addressing the disproportionate impact of gender-based violence on female residents of the borough and linked to existing VAWG Strategies across London, nationally and internationally. This consultation report relates to the updated VAWG Strategy 2016-2019, which will be launched in late 2016.

Between October 2015 and February 2016, a comprehensive consultation process was undertaken across the borough to influence the development of the second Violence Against Women and Girls (VAWG) Plan which will be published in Spring 2016.

This report outlines the key learning from the consultation process and:

- Looks at the prevalence of various forms of violence against women and girls within the borough
- Looks at the experience of female survivors of violence and provides an overview of what we currently know about local needs
- Provides an overview of the national and regional context of work on addressing violence against women and girls
- Provides an assessment of our current approach to tackling violence against women and girls in Tower Hamlets
- Highlights proposals made during the consultation on the way forward for tackling VAWG in Tower Hamlets

The violence against women and girls consultation involved:

- Consultation with professionals and partners through our local VAWG professional networks
- An on-line consultation
- Individual interviews with key stakeholders
- A series of focus groups held with local groups of survivors, women and young people
- Presentations at meetings including the LSCB
- Feedback from boards including DV Forum, CSP and Adults and Childrens Safeguarding Boards

⁵⁰ Tower Hamlets Community Plan 2015, available at:

http://www.towerhamlets.gov.uk/ignl/community_and_living/community_plan/community_plan.aspx

(last accessed 10.02.16)

Highlights from the consultation process

Awareness

Our consultation has shown that the vast majority of people consulted are aware of VAWG services in the borough. Almost 80% of respondents across all of the groups consulted have some awareness of the work and all of the individuals interviewed know about the work. This represents a large increase from the consultation held in 2013 for the first VAWG Plan.

Strands

All respondents believe that we should continue to prioritise the existing VAWG strands and are in agreement that there needs to be more work focussing on online methods used to abuse victims. The internet has increased as a facilitator of abuse since our first VAWG Plan and there is a need to recognise this.

Barriers

Barriers to disclosure differed depending on the consultation group but there was a cross-cutting barrier around people not disclosing as they did not understand what constituted abuse meaning that there is greater need to provide training and awareness to all residents and professionals in Tower Hamlets. For professionals the greatest barrier to disclosure for victims of VAWG was the increased complexity that women experiencing multiple disadvantage (mental health, complex needs, drugs and alcohol, homelessness and No Resource to Public Funds) as well as a marked fear of institution identified. For young people, the greatest barrier was a feeling of shame or embarrassment on disclosure of abuse and the feeling that professionals do not fully understand their experiences of VAWG.

Challenges

The two areas that respondents feel would have the biggest impact in the current economic climate are: prioritising prevention work and strengthening multi-agency links across all services in the borough. One of the comments includes: *The key for me is multi-agency working and skilling up all professionals to address VAWG. I feel like there could also be work done on spaces where people are likely to disclose - friends and family, medical context. While the focus on police and reporting is important this does not reflect how survivors access help.*

Current gaps in services

The main gap that has been identified is the lack of multi-agency working of some statutory and voluntary organisations in the borough. The other key areas that respondents feel is currently missing is support for women with no recourse to public funds (NRPF) (especially single women) and also women with multiple disadvantage. These are two new priority areas for development of our new strategy. For survivors it was a need to have survivor led spaces combined with a two pronged approach of crisis-support and ongoing emotional and practical support as risks reduced.

Recommendations

The recommendations across the 3 groups – survivor and community consultation, young people and professionals had cross-cutting similarities but also nuanced difference pertaining to the individual group. There was consensus to build upon the work of the previous VAWG Plan but to expand in some areas, particularly prevention and community engagement and to develop other areas, especially around NRPF and complex needs.

It is obvious from consultation as well as evaluation through Strategic Assessments that there has been a change in Tower Hamlets since 2013 in terms of identifying, recording and supporting victims of VAWG. Recording has increased across the majority of strands (it is thought that dowry-related abuse continues to be subsumed under domestic abuse figures) and responses by professionals have improved although there is still a staggering need for more training to all professionals.

Survivor and Community Recommendations

- Prevention should be a key priority within the VAWG Strategy
- A multi-agency approach to delivering services for survivors is the best approach
- Multi-pronged, individual approach is needed to best support survivors
- Perpetrators should be given support to understand the consequences of their behaviour
- Hold a public awareness campaign to help women members in the community understand that experiencing abuse is not their fault
- Delivery of training to professionals on how to support survivors of VAWG with an empathetic approach
- Peer support methods, including group sessions, should be implemented
- The community champions programme should be expanded

Young people's Recommendations

- Focus on providing young people with information about all of the strands of VAWG and where they can get help and support
- Develop the work in schools to ensure that all young people are getting the right messages about what is acceptable and what is not acceptable
- Development the youth champions programme, recognising that young people will often disclose to other young people
- Work with parents so that they understand the issues that young people face and can support their children
- Work with young people so that they can recognise that pornography and the media send out the wrong messages to young people about what healthy relationships look like.

Professionals' Recommendations

- Prevention should be a key priority in a climate of welfare reform and cuts. Continuation and expansion of work with young people, starting from reception is vital

- Links between competing priorities and VAWG should be made more explicitly – for example countries where FGM is emerging due to the increase in radicalisation and the increase in threat of extremism as a factor in child arrangement orders in the family courts
- Maintain the four objectives from the previous VAWG Plan but expand to highlight the need for better partnership working and participation by survivors
- Develop work across sectors, including having a renewed focus on women experiencing multiple disadvantage and work with older and disabled women
- Develop a survivors' forum which will be a peer support group for survivors of all forms of VAWG
- Commission services for young people experiencing VAWG as they often fall through gaps between children's and adult services and existing services are predominantly funded externally
- Develop links with some of the large employers in the borough to highlight the impact of VAWG on their staff
- The key barriers to disclosure are faced by women experiencing multiple disadvantage and a fear of institutions. These need to be a key focus of the VAWG Strategy
- There is broad based support for the existing strands but there needs to be a focus on the internet as a facilitator of abuse

Appendix 4: VAWG Performance Matrix 2015/2016

Performance Indicators

The indicators for each strand are outlined below. Due to the overlapping nature of the strands of VAWG, there is some necessary overlap between indicators. To this end, only individual indicators are included within each area. This can be highlighted through the examples below⁵¹ and is highlighted throughout our VAWG work:

- The Health Service is in a unique position in that virtually every woman will use the health care system at some point. Health professionals treat injuries from physical and sexual violence, including female genital mutilation and deal with the longer term impacts on health and mental health, especially with respect to adult survivors of child sexual abuse.
- Teachers and education welfare officers are in daily contact with girls who are living with: domestic violence and/or sexual abuse; violence in their own relationships; sexual exploitation; threats of forced marriage, FGM and/or 'honour-based' violence, which may include girls and young women being missing from school.
- Social services, missing persons units, educational welfare officers, PREVENT officers and LSCBs are often all involved in support and intervention, but may not be making connections with threats or realities of violence.
- Significant proportions of referrals to Social Services involve some form of VAWG: domestic violence; child sexual abuse; adult survivors of child sexual abuse; sexual exploitation and trafficking; risk of FGM; forced marriage and so-called 'honour' based violence. In complex cases it will be the compounding disadvantage of multiple forms of VAWG.
- Substance misuse services are working with women who use drugs and alcohol as self-medication to cope with violence and abuse and with perpetrators (NOTE: alcohol does not 'cause' VAWG, most assaults take place when individuals are sober, but it is associated with heightened levels of injury).
- Police are often first responders to incidents of VAWG, and devote considerable resources to investigating sexual offences, domestic violence and sexual exploitation of women and girls.
- Escaping violence and abuse is a significant reason for leaving home. Homeless women, especially those who are young, are particularly vulnerable to violence, the impacts of which add to their support needs.
- Many women offenders have experienced some form of violence/abuse, including those in caseloads of probation services.

⁵¹ Adapted from Kelly, L. and Coy, M. (2012) *Building Blocks: A Strategy and Action Plan for Addressing Violence Against Women and Girls in Thurrock*, London, CWASU: London Metropolitan University

Assumptions

- ➔ There is an expectation that there is a training and awareness element linked to all action plans for professionals, young people and the community. The training will be multi-agency but led by the Domestic Violence and Hate Crime Team (unless explicitly stated otherwise)
- ➔ There is an expectation that there is an increase of referrals to the multi-agency risk assessment conferences (MARACs) both the prostitution and domestic violence MARACs
- ➔ There is an expectation that, due to the expansive definition of domestic violence contained within the action plan, legal remedies (civil and criminal) for issues including: coercive and controlling behaviour, forced marriage, harmful practices, FGM and stalking and harassment are included. Therefore they are not explicitly contained within the plans below
- ➔ There is an expectation that the police will work closely with all agencies to tackle the perpetrators of all forms of VAWG.
- ➔ There is an assumption that appropriate information sharing agreements (ISAs) are in place across each strand which address data sharing and intelligence, confidentiality and client records.
- ➔ There is an assumption that where the action plans are not within the remit of the VAWG Steering Group, that the VAWG Strategy Manager will seek to influence those action plans to include the wider VAWG agenda. For example, DV Action Plan, CSE Action Plan etc.
- ➔ There is an assumption that the members of the VAWG Steering Group will seek to proactively encourage their agency to respond appropriately and holistically to all forms of VAWG.

1. Domestic Violence

Tower Hamlets consistently has one of the highest rates of reported domestic abuse across London. Between November 2014 and November 2015 there were 2773 domestic crimes reported which is a 13.3% on the previous year and means that Tower Hamlets had the third highest rates of reporting in London (after Croydon and Greenwich).⁵²

Tower Hamlets has developed a coordinated response to domestic violence that includes:

- Multi-agency reporting and referral procedures
- A multi-agency risk assessment process which includes the MARAC
- The partnership campaign 'Domestic Abuse No Excuse'
- Domestic Violence One-Stop-Shop
- Specialist Domestic Violence Court
- Specialist information and advice surgeries at the Housing Options Team and at the Barkantine Medical Centre

Our partnership response to tackling domestic violence is overseen by the Tower Hamlets Domestic Violence Forum which is an umbrella body for organisations working with families experiencing domestic violence in the borough. The Forum is responsible for the annual Domestic Violence Action Plan which sets out our commitment to address four key objectives:

- Safe choices for adult victims of domestic violence
- Improving safety of children affected by domestic violence
- Holding perpetrators accountable
- Challenging social tolerance to domestic violence

⁵² Metropolitan Police Crime Figures, available at: <http://www.met.police.uk/crimefigures/> (last accessed 11.01.16)

Domestic Violence is not subject to the scrutiny of the VAWG Steering Group as a separate Action Plan exists under the auspices of the Domestic Violence Forum (outlined above) which meets quarterly and reports to the Community Safety Partnership. The DV Action Plan is reviewed on an annual basis. The DV Action Plan can be provided for reference purposes to this group.

	Outcome	Key Agencies	Indicator	Means of Verification
Domestic Violence	N/A	DV Forum	<i>See DV Action Plan</i>	DV Action Plan

2. Sexual Violence

Violence against women and girls (VAWG) is a significant problem in the borough. The Violence Indicator Profiles for England (VIPER) show that Tower Hamlets has the sixth highest number of recorded sexual offences in England and the third highest in London, ranking 322 out of 326.⁵³ In 2014/2015, Tower Hamlets had the 9th highest prevalence in London for Rape and 16th for sexual offences. This is not disaggregated by borough size or population.⁵⁴

Table 1: Rape and Sexual Offences reported to the Police (2014-2015)

Offences	Number
All Rape offences	167
Other serious sexual offences	330

⁵³ Violence Indicator Profiles for England Resource (VIPER), available at: www.eviper.org.uk (last accessed 17.12.13)

⁵⁴ Metropolitan Police Crime Mapping, available at: <http://maps.met.police.uk/tables.htm> (last accessed 11.01.16)

Sexual Violence Performance Indicators

Outcome	Key Agencies	Indicator	Means of Verification
Victims of historical or current sexual violence are encouraged to report	Police (SC and O2)	Reported rates of sexual violence	Increased reporting of sexual violence to the police
3 rd party reporting sites for sexual violence are fully operational	3 rd party reporting centres	3 rd party reporting sites available for reports	Increased reporting of sexual violence from 3 rd party reporting sites.
Agencies across all sectors in Tower Hamlets feel equipped to provide support or make appropriate referrals to support services	LBTH DV and Hate Crime Team SV Forum Health (CCG, Public Health, ELFT, BARTS Health) Adult and Child Safeguarding Boards Housing Specialist support services Education	Increased referrals to sexual violence support services by professionals in TH Professionals across TH access sexual violence training Increased referrals to MARAC	Figures from HAVEN, ELRC and Police Training evaluation forms (including pre and post questionnaires) MARAC referral figures
Victims of sexual violence are able to access timely, appropriate support (health and psycho-sexual support)	HAVEN East London Rape Crisis (ELRC) Independent Sexual Violence Advocates (Open Doors and Respond) Victim Support Violent Crime Caseworkers	Increased referrals to sexual violence support services	Reports from the sexual violence services

Victims of sexual violence (especially in domestic abuse situations) are able to access support through GP and sexual health settings	Public Health Sexual Health Providers GP Practices IRIS implementation group	Increased referrals received by non-traditional sexual violence support	IRIS evaluation Increased referrals to MARACs
Victims of sexual violence report satisfaction and confidence in the service they receive from the police	Metropolitan Police	Increase in victim satisfaction	Victim Satisfaction surveys

Note: Sanctioned detection figures will also be included for information only, not as an outcome target.

Page 274

Prostitution

There are no conclusive figures on the levels of sex working in Tower Hamlets. The case management service which has been tendered to Open Doors established a baseline early in 2014 in conjunction with the Vice Team. The Vice Team, which was part of the Police Partnership Taskforce Team 2 (PTF2) and now Team 3 (PTF 3), has identified approximately 70 individual women engaged in street based prostitution in Tower Hamlets.

In terms of trafficking, the National Referral Mechanism has identified 5 Tower Hamlets women who have been trafficked in 2014/2015. Of these, all 5 had been internally trafficked.

Prostitution Indicators

Outcome	Key Agencies	Indicator	Means of Verification
Development of multi-agency coordination and accountability for prostitution	Tower Hamlets Prostitution Partnership (THPP)	Tower Hamlets' Prostitution Partnership established	4 meetings per annum with continued and increasing membership from across statutory and voluntary sector

Women with 'red flag' indicators are supported to reduce their risk	Tower Hamlets Prostitution Partnership (THPP)	MARAC meetings created to support women engaged in prostitution where 'red flag' identified	Numbers of women referred to prostitution MARAC Numbers of women re-referred to prostitution MARAC
Women engaged in prostitution are offered holistic support across health, housing, education and criminal justice	Tower Hamlets Prostitution Partnership (THPP) DIP Case Management Service Vice	Increased mandatory drug testing on arrest Reduction in criminal justice involvement Case management outcomes (see separate actions)	DIP Reports Criminal Justice involvement Numbers of arrests Case management indicators
Agencies across Tower Hamlets feel supported to support women engaged in prostitution	Tower Hamlets Prostitution Partnership (THPP) LBTH DV and Hate Crime Team	Increased training to professionals across TH	Pre and Post Evaluation questionnaires
Residents are engaged in partnership work to reduce prostitution related ASB	Tower Hamlets Prostitution Partnership (THPP)THPP LBTH DV and Hate Crime Team Residents	Increased support from residents towards supporting sex workers to address ASB	Hopetown Community Meetings LIFT campaign meetings Other resident meetings, including walkabouts in 'hot spot' areas
Men who buy sex are targeted with police actions including letters deterring them from TH	Police	Decrease in demand for prosecution	Numbers of letters sent to men Police Vice returns

4. Child Sexual Exploitation (including related to groups, peers and gangs)

The Office of the Children’s Commissioner’s Interim Report of their Inquiry into Sexual Exploitation due to Groups and Gangs identified that across England there were 2409 confirmed victims of child sexual exploitation, and 16,500 young people at risk of the same. This included 533 cases of gang-associated child sexual exploitation⁵⁵

Currently there is a multi-agency response to Child Sexual exploitation in Tower Hamlets. Children under 18 cannot consent to any form of commercial sexual activity and, as such, Tower Hamlets’ considers any cases of individuals under the age of 18 who are engaged in commercial sexual activity as child sexual exploitation (as does legislation in England and Wales)⁵⁶. Referrals to Children’s Social Care will be immediately made. Tower Hamlets’ Safeguarding Children Board Child Sexual Exploitation sub-group has developed Tower Hamlets’ approach to CSE, including protocols and actions plans.

The MASE meeting (Multi-Agency Child Sexual Exploitation Meeting) is now a strategic level meeting with a practitioners’ forum which is a MARAC style meeting. Protocols and Information Sharing Guidelines are available from Children’s Social Care.

Page 276

	Outcome	Key Agencies	Indicator	Means of Verification
Child Sexual Exploitation	N/A	LSCB CSE Sub-Group	See CSE Action Plan	CSE Action Plan

⁵⁵ OCC (2012) *I Thought I was the Only One, The Only One in the World. The Office of the Children’s Commissioner’s Inquiry into Child Sexual Exploitation in Gangs and Groups* London: OCC for England

⁵⁶ Tower Hamlets’ consideration precedes the removal of all references to the outdated ‘child prostitute’ in the Serious Crime Act 2015.

5. Female Genital Mutilation

There are no accurate figures of women who have undergone or are at risk of FGM in Tower Hamlets although prevalence data based on the 2011 census has been published by City University and Equality Now. Data collection and research are one of the key tasks of the FGM multi-agency group moving forward. The East London FGM Group which is mapped to the VAWG Plan is currently working on updating the figures for FGM as they are out of date.

Tower Hamlets' is taking a partnership multi-agency approach to tackling FGM. The FGM group was set up to explore a multi-agency approach. The approach moving forward will focus on three key areas of work:

- Improving data collection and research in Tower Hamlets
- Improving safeguarding and health for women who have undergone FGM and protecting those at risk
- Highlighting the importance of prevention

Female Genital Mutilation Indicators

Outcome	Key Agencies	Indicator	Means of Verification
Realistic prevalence figures for FGM are established in TH	North East London FGM Group City University Barts Health	Prevalence figure for TH established	FGM figures
Women and Girls in the community who have undergone FGM or who are at risk are supported with health and psycho-sexual needs	Barts Health Education North East London FGM Group	Health and psycho-sexual counselling services are made available	Referral pathway and protocol established across health and education

Health services develop routine enquiry for FGM as well as training for frontline health professionals	Barts Health Education Health Children's Social Care	Increased numbers of girls and young women established through routine enquiry	Barts Health midwifery figures School nursing figures Children's Social care figures from cases referred to the FGM social worker (from August 2015)
A comprehensive training programme for professionals and young people is developed with the aim of raising awareness and working towards prevention of FGM	North East London FGM Group LBTH Domestic Violence and Hate Crime Team	Training package developed and delivered	Pre and post evaluation questionnaires

6. Harmful Traditional Practices

Tower Hamlets' has a multi-agency partnership approach to tackling So-called harmful practices (HP) including: 'honour' based violence (HBV) and forced marriage. Female Genital Mutilation should also be considered under harmful practices but there is a separate action plan which includes health so it is dealt with separately. The strands are considered together as they are all linked to cultural notions of 'honour' and are part of the harmful practices pilot Tower Hamlets is running with MOPAC.

Prevalence of 'honour' based violence reported to the Police

Prevalence	2010/2011	2011/2012	2012/2013	2013/2014	2014/2015
	7	11	12	6	6

Prevalence of forced marriage reported to the Police (2014/2015)

6 cases of Forced Marriage were reported to the police in 2014/2015

As can be identified from the figures above, the reported rates of both HBV and Forced Marriage are extremely low. It is believed that there is massive underreporting of these crimes for a variety of reasons. Although we have tried to establish the prevalence of dowry related abuse, there appear not to have been any reports to the police or to voluntary sector agencies in Tower Hamlets.

Page 279

Harmful Practices Indicators

Outcome	Key Agencies	Indicator	Means of Verification
Realistic prevalence figures for HP are established in TH	HP Group DVHCT Police	Prevalence figure for TH established	HP figures

<p>Women and Girls who have experienced or are at risk of any form of HP are provided with appropriate support</p>	<p>HP Group Health (Barts Health, CCG and ELFT as well as other community health)</p>	<p>Increased referrals to health agencies of HP</p>	<p>Referral pathways and protocol established across health and education Referral figures for health for HP</p>
<p>Joint working with faith groups and community groups is developed for all forms of HP, including FGM</p>	<p>Faith leaders Community leaders Health DVHCT</p>	<p>Faith and community leaders feel more supported to engage their faith communities on HP</p>	<p>Pre and post evaluation questionnaires Focus groups</p>

7. Stalking and Harassment

According to the 2010/11 Crime Survey for England and Wales, 18% of women had been subject to stalking or harassment at some point in their lifetime.⁵⁷ Using the Home Office VAWG Ready Reckoner tool, it is estimated that in Tower Hamlets over 10,000 women will have been subjected to stalking in the past 12 months.⁵⁸ In 2014/2015 there were 155 cases to MARAC which involved some form of stalking and harassment, 143 female and 12 male.

Stalking and Harassment Indicators

Outcome	Key Agencies	Indicator	Means of Verification
Stalking and harassment are recorded as separate crimes rather than an element of domestic violence	Police LBTH DV and Hate Crime Team (through DV1 forms)	Increased numbers of individual crimes of stalking and harassment are recorded	Metropolitan police figures DV Database figures IDVA reports
Women who experience stalking and harassment are supported with housing (including sanctuary)	Housing Sanctuary	Women who have experienced S&H have accessed appropriate support	DV Database figures Sanctuary scheme figures
Women and girls who have experienced S&H are supported to develop appropriate support plans which are reviewed regularly	IDVA service Floating Support	Individual support plans are developed by appropriate support services	Women report increased support IDVA and Floating support reports
Women and girls who have experienced are supported to ask for prohibitive orders including: non-molestation orders	OSS VS	Increased use of orders	Numbers of non-molestation orders applied for

⁵⁷ Chaplin, R., Flatley, J. and Smith, K. (Eds.) (2011) Crime in England and Wales 2010/11 Findings from the British Crime Survey and police recorded crime (2nd Edition), Home Office and ONS.

⁵⁸ Home Office, *VAWG Ready Reckoner*,

<http://webarchive.nationalarchives.gov.uk/20100104215220/http://crimereduction.homeoffice.gov.uk/domesticviolence/domesticviolence072.htm> (last accessed 19.02.12).

Appendix 5: 'Whole School' approach to Tackling VAWG

What is a whole school approach?

Schools can create an environment which both promotes their belief and commitment that all forms of VAWG are not acceptable, and that they are willing to discuss and challenge it. A 'whole school' approach involves embedding key messages about gender equality, human rights and child protection across the whole school environment – taking both a 'top down' (institutional level) and a 'bottom up' (students taking a lead on the issues) approach to tackling VAWG. There has been recognition by researchers and practitioners that one-off lessons or assemblies, whilst extremely valuable first steps in awareness raising of the issues, have limited impact if the key messages are not supported by other initiatives and made part of the school's ethos.⁵⁹

We want to see **schools** take a 'Whole-School Approach' to VAWG through:

Policy/Institutional Level

- Explicit inclusion of VAWG within safeguarding and bullying policies (i.e. bullying policies should include sexual bullying and harassment and child protection policies should include specific reference to female genital mutilation, child sexual exploitation and domestic abuse)
 - Staff leadership of VAWG agenda
 - Link to priority areas such as attainment, good behaviour, child protection, anti-bullying and social inclusion
 - Explicit inclusion within Governors' role
 - Curriculum review
 - Ensuring students have access to specialist VAWG support services in the community
- ➔ Not just seen as a token notion but embedded within the school ethos

Work with Students

- Inclusion of VAWG in PSHE lessons
 - Peer education training programme developed
 - Young people engaged in a campaigning role on VAWG
 - Group work with young women and young men
 - Group work on cyber bullying and sexual bullying
 - Inclusion of a VAWG sub-group of the student council
- ➔ Enabling young people to develop their own language and lessons

Work with Staff

- Training on VAWG awareness and response
- Development of staff resources
- Identification of a VAWG champion as point of contact for other teaching and non-teaching staff (can be child protection lead)
- VAWG addressed throughout the curriculum, including Personal Social Health and Economic (PSHE) education, Sex and Relationships Education (SRE) and Citizenship classes. This should

⁵⁹ See for example Maxwell, C., Chase, E., Warwick, I. and Aggleton, P. with Wharf, H. (2010), *Preventing Violence, Promoting Equality: A Whole School Approach*, London: Institute of Education, University of London for Womankind Worldwide and Banos Smith, M. (2011) *A Different World is Possible: Promising Practices to Prevent Violence Against Women and Girls*, London: EVAW

include teaching sexual consent, building healthy relationships and addressing all forms of VAWG including harmful practices, as well as gender stereotypes, media literacy and women's equality.

- Ensuring teachers receive ongoing training on understanding and dealing with all forms of VAWG, including handling disclosures and delivering lessons on prevention.
- ➔ Sensitive, responsive support for staff to equip them with the resources to make appropriate referrals and to deal effectively with child protection issues linked to wider forms of VAWG

Work with Parents

- Working with parent support workers to increase confidence
- Work with parents to identify risk factors for VAWG
- Deliver training to both parents and parent support workers
- Develop leaflets for parents to help to support them
- ➔ Parents engaged as a key partner to ensure young people are better supported and parents feel confident about helping their children

Aims of the schools' young people programme?

- Develop a shared understanding of domestic abuse and healthy relationships that is relevant for all young people across Tower Hamlets.
- Develop a shared definition of domestic abuse and healthy relationships that can be used across all schools in Tower Hamlets
- Develop school into a safe space where young people feel confident to disclose abuse and know where to go for appropriate support
- Provide young people with the skills to help other young people learn about the issues and help to protect themselves in the future
- Develop routes for support for young people who are at risk of, or are experiencing abuse (after safeguarding procedures have been followed).

Outcomes

➔ **The key outcome of the programme is that young people feel confident about understanding what a healthy relationship is and know how to get appropriate support.**

Other outcomes include:

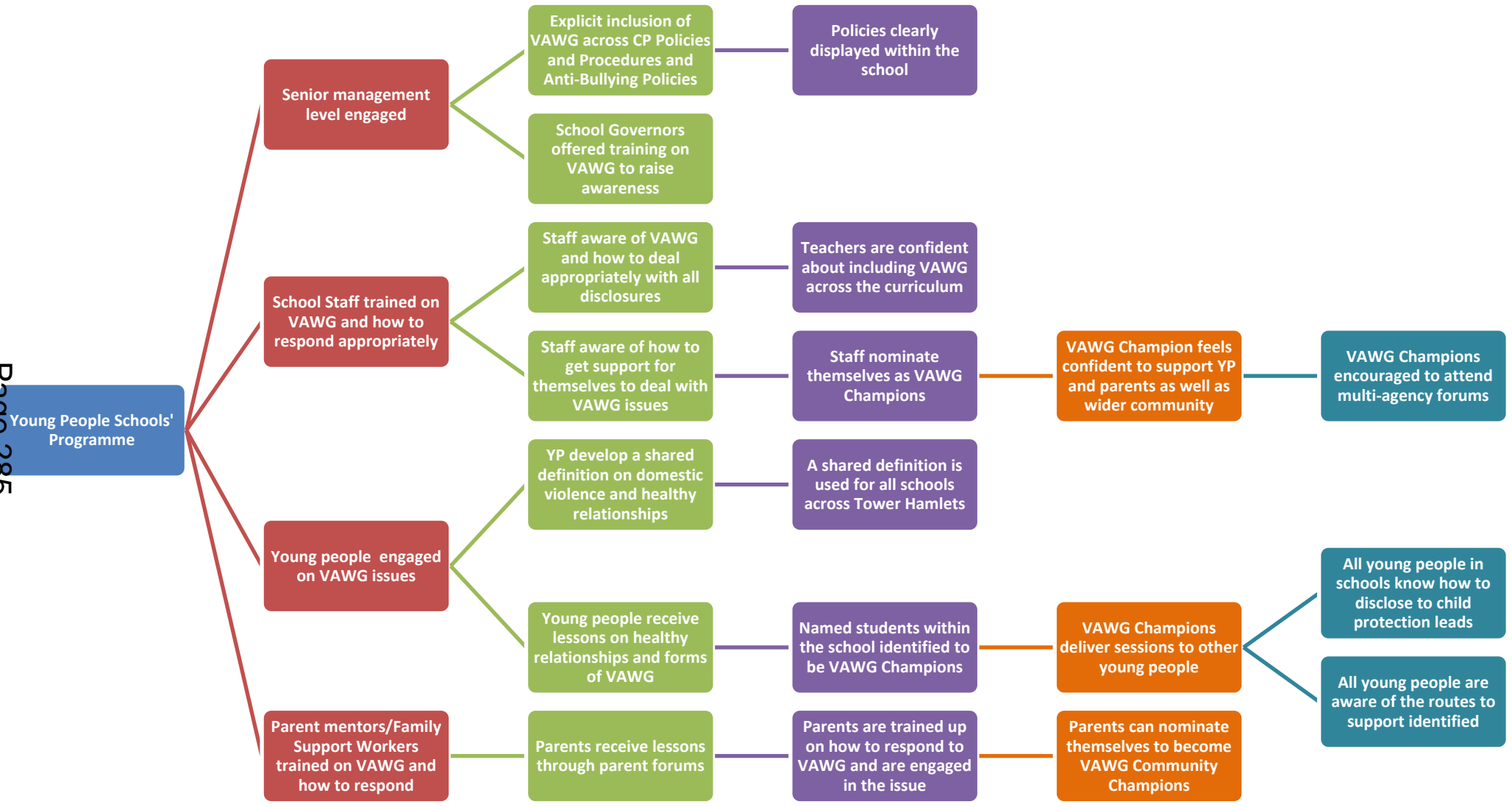
- Standardised approach to delivering PSHE education on VAWG in Tower Hamlets
- Staff members report increased confidence to identify and appropriately respond to VAWG
- Increase in appropriate referrals through the use of simpler, clearer referral pathways
- Young people involved in the programme will report improved emotional health and improved relationships
- Increase in education professionals involved in strategic forums
- Parents report increase confidence to identify and appropriately respond to VAWG

Figure 2: 'Whole School' Approach to Tackling VAWG

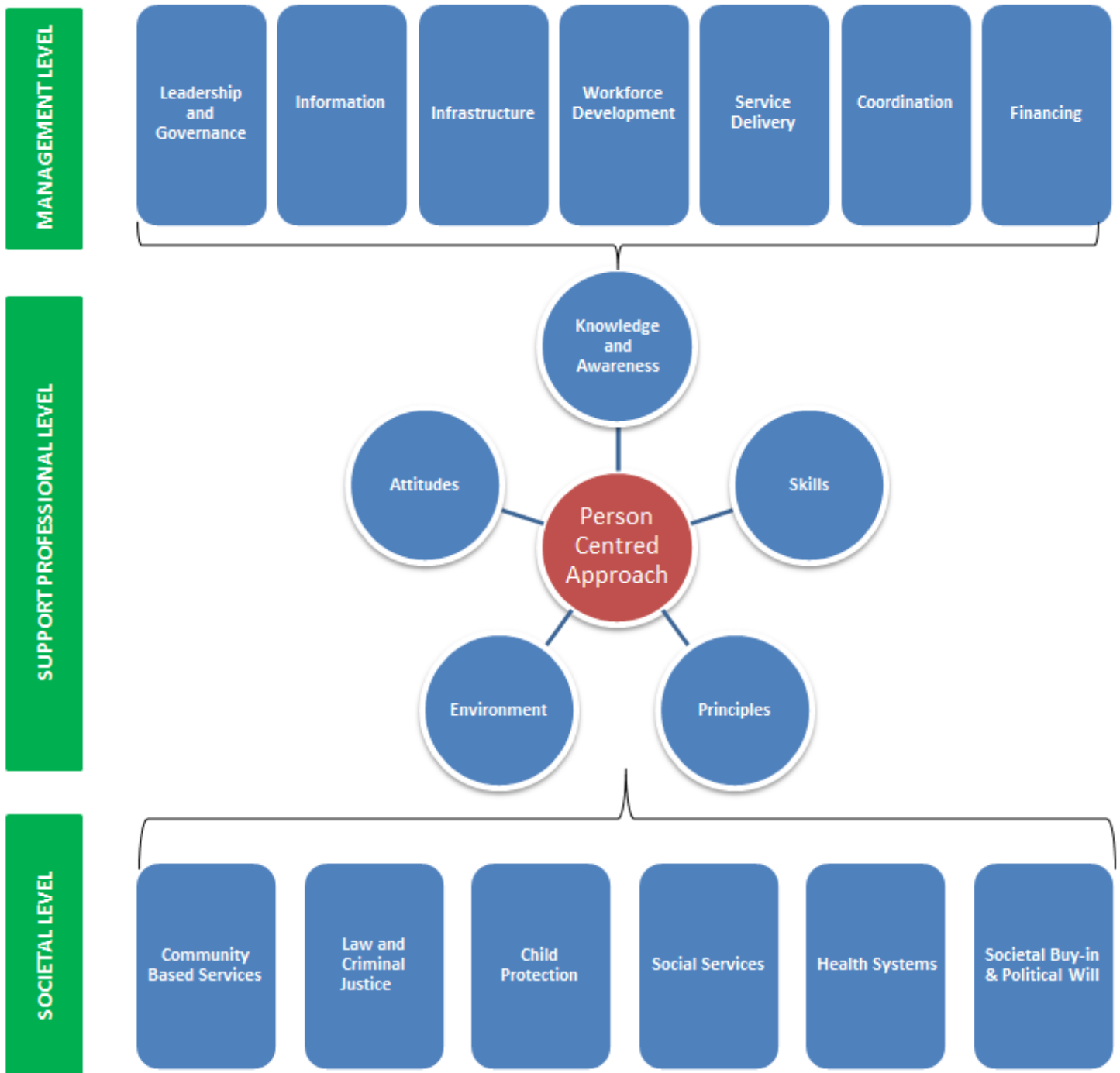


Figure 3: 'Whole School' Approach Pathway Model

Page 285



Appendix 6: Person Centred Approach



Source: Adapted from 'Figure 2: Elements of the health system and health-care response necessary to address violence against women' in Garcia-Moreno *et al, op. cit.* footnote 30, page 4

Appendix 7: List of Acronyms

ASB	Anti-social Behaviour
BME	Black and Minority Ethnic
CAADA	Coordinated Action against Domestic Abuse (Now Safelives)
CCG	Clinical Commissioning Group
CCR	Coordinated Community Response
CSE	Child Sexual Exploitation
CSP	Community Safety Partnership
DCLG	Department for Communities and Local Government
DFID	Department for International Development
DHR	Domestic Homicide Review
DVF	Domestic Violence Forum
DVHCT	Domestic Violence and Hate Crime Team
ELFT	East London Foundation Trust
ELRC	East London Rape Crisis
FGM	Female Genital Mutilation
FM	Forced Marriage
HBV	So-called 'honour' based violence
HWB	Health and Wellbeing Board
IDVA	Independent Domestic Violence Adviser
IPST	Integrated Pathways and Support Team
JSNA	Joint Strategic Needs Assessment
LGBT	Lesbian, Gay, Bisexual and Transgender
LSCB	Local Safeguarding Children Board
MARAC	Multi-Agency Risk Assessment Conference
MASE	Multi-agency Sexual Exploitation Meeting
MASH	Multi-agency Safeguarding Hub
MDI	Multiple Deprivation Indices
MOPAC	Mayor's Office for Policing and Crime
NRPF	No Recourse to Public Funds
OSS	One Stop Shop
PSHE	Personal Social Health and Economic Education
RAG Rating	Red Amber Green Rating

SCR	Serious Case Review
SDVC	Specialist Domestic Violence Court
SRE	Sex and Relationships Education
SVIP	Survivors' Voices Inclusion Project
TOC	Theory of Change
UKROL	UK Refuges Online
UN	United Nations
VAWG	Violence Against Women and Girls
VIPER	Violence Indicator Profiles for England

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**London Borough of
Tower Hamlets**

**Violence against
Women and Girls**

**Consultation
Report**

2016

Contents

Executive Summary	2
Section 1: Background	
1. Introduction	6
2. Borough Profile	6
3. Tower Hamlets' Strategic Approach to tackling VAWG	7
4. National and Regional Initiatives	8
5. VAWG	9
Section 2: Impact of Violence Against Women and Girls	23
Section 3: Survivor Consultation	26
Section 4: Community Consultation	35
Section 5: Stakeholder Consultation	39
Appendix 1: Consultation Log	51
Appendix 2: Online and Paper Consultation	53
Appendix 3: Additional Questions asked during Interview	58

EXECUTIVE SUMMARY

Introduction

Violence against women and girls issues form part of our local partnership approach to improving safety in the borough. Tackling VAWG is a priority within the 2015 Community Plan's *A Safe and Cohesive Community* strand.¹ Currently the oversight of violence against women and girls initiatives sits within the Community Safety Partnership (CSP) with sideways accountability to the Health and Wellbeing Board (HWB). Leadership locally is provided by the Community Safety Partnership.

Tower Hamlets has had a Domestic Violence Team for over 15 years and a specific action plan for at least 10 years, aimed at tackling domestic violence against anyone who is experiencing abuse. In 2013, the borough launched an additional strategy, the Violence Against Women and Girls (VAWG) Plan, aimed at addressing the disproportionate impact of gender-based violence on female residents of the borough and linked to existing VAWG Strategies across London, nationally and internationally. This consultation report relates to the updated VAWG Strategy 2016-2019, which will be launched in late 2016.

Between October 2015 and February 2016, a comprehensive consultation process was undertaken across the borough to influence the development of the second Violence Against Women and Girls (VAWG) Plan which will be published in Spring 2016.

This report outlines the key learning from the consultation process and:

- Looks at the prevalence of various forms of violence against women and girls within the borough
- Looks at the experience of female survivors of violence and provides an overview of what we currently know about local needs
- Provides an overview of the national and regional context of work on addressing violence against women and girls
- Provides an assessment of our current approach to tackling violence against women and girls in Tower Hamlets
- Highlights proposals made during the consultation on the way forward for tackling VAWG in Tower Hamlets

The violence against women and girls consultation involved:

- Consultation with professionals and partners through our local VAWG professional networks
- An on-line consultation
- Individual interviews with key stakeholders
- A series of focus groups held with local groups of survivors, women and young people

¹ Tower Hamlets Community Plan 2015, available at:

http://www.towerhamlets.gov.uk/ignl/community_and_living/community_plan/community_plan.aspx

(last accessed 10.02.16)

Highlights from the consultation process

Awareness

Our consultation has shown that the vast majority of people consulted are aware of VAWG services in the borough. Almost 80% of respondents across all of the groups consulted have some awareness of the work and all of the individuals interviewed know about the work. This represents a large increase from the consultation held in 2013 for the first VAWG Plan.

Strands

All respondents believe that we should continue to prioritise the existing VAWG strands and are in agreement that there needs to be more work focussing on online methods used to abuse victims. The internet has increased as a facilitator of abuse since our first VAWG Plan and there is a need to recognise this.

Barriers

Barriers to disclosure differed depending on the consultation group but there was a cross-cutting barrier around people not disclosing as they did not understand what constituted abuse meaning that there is greater need to provide training and awareness to all residents and professionals in Tower Hamlets. For professionals the greatest barrier to disclosure for victims of VAWG was the increased complexity that women experiencing multiple disadvantage (mental health, complex needs, drugs and alcohol, homelessness and No Resource to Public Funds) as well as a marked fear of institution identified. For young people, the greatest barrier was a feeling of shame or embarrassment on disclosure of abuse and the feeling that professionals do not fully understand their experiences of VAWG.

Challenges

The two areas that respondents feel would have the biggest impact in the current economic climate are: prioritising prevention work and strengthening multi-agency links across all services in the borough. One of the comments includes: *The key for me is multi-agency working and skilling up all professionals to address VAWG. I feel like there could also be work done on spaces where people are likely to disclose - friends and family, medical context. While the focus on police and reporting is important this does not reflect how survivors access help.*

Current gaps in services

The main gap that has been identified is the lack of multi-agency working of some statutory and voluntary organisations in the borough. The other key areas that respondents feel is currently missing is support for women with no recourse to public funds (NRPF) (especially single women) and also women with multiple disadvantage. These are two new priority areas for development of our new strategy. For survivors it was a need to have survivor led spaces combined with a two pronged approach of crisis-support and ongoing emotional and practical support as risks reduced.

Recommendations

The recommendations across the 3 groups – survivor and community consultation, young people and professionals had cross-cutting similarities but also nuanced difference pertaining to the individual group. There was consensus to build upon the work of the previous VAWG Plan but to expand in some areas, particularly prevention and community engagement and to develop other areas, especially around NRPF and complex needs.

Although the evaluation of the first VAWG Plan is not due until autumn 2016, it is obvious that there has been a change in Tower Hamlets in terms of identifying, recording and supporting victims of VAWG. Recording has increased across the majority of strands (it is thought that dowry-related abuse continues to be subsumed under domestic abuse figures) and responses by professionals have improved although there is still a staggering need for more training to all professionals.

Survivor and Community Recommendations

- Prevention should be a key priority within the VAWG Strategy
- A multi-agency approach to delivering services for survivors is the best approach
- Multi-pronged, individual approach is needed to best support survivors
- Perpetrators should be given support to understand the consequences of their behaviour
- Hold a public awareness campaign to help women members in the community understand that experiencing abuse is not their fault
- Delivery of training to professionals on how to support survivors of VAWG with an empathetic approach
- Peer support methods, including group sessions, should be implemented
- The community champions programme should be expanded

Young people's Recommendations

- Focus on providing young people with information about all of the strands of VAWG and where they can get help and support
- Develop the work in schools to ensure that all young people are getting the right messages about what is acceptable and what is not acceptable
- Development the youth champions programme, recognising that young people will often disclose to other young people
- Work with parents so that they understand the issues that young people face and can support their children
- Work with young people so that they can recognise that pornography and the media send out the wrong messages to young people about what healthy relationships look like.

Professionals' Recommendations

- Prevention should be a key priority in a climate of welfare reform and cuts. Continuation and expansion of work with young people, starting from reception is vital
- Links between competing priorities and VAWG should be made more explicitly – for example countries where FGM is emerging due to the increase in radicalisation and the increase in threat of extremism as a factor in child arrangement orders in the family courts

- Maintain the four objectives from the previous VAWG Plan but expand to highlight the need for better partnership working and participation by survivors
- Develop work across sectors, including having a renewed focus on women experiencing multiple disadvantage and work with older and disabled women
- Develop a survivors' forum which will be a peer support group for survivors of all forms of VAWG
- Commission services for young people experiencing VAWG as they often fall through gaps between children's and adult services and existing services are predominantly funded externally
- Develop links with some of the large employers in the borough to highlight the impact of VAWG on their staff
- The key barriers to disclosure are faced by women experiencing multiple disadvantage and a fear of institutions. These need to be a key focus of the VAWG Strategy
- There is broad based support for the existing strands but there needs to be a focus on the internet as a facilitator of abuse

CONSULTATION REPORT

SECTION 1: BACKGROUND

Introduction

Between October 2015 and February 2016, a comprehensive consultation process was undertaken across the borough to influence the development of the second Violence Against Women and Girls (VAWG) Plan which will be published in Spring 2016.

This report outlines the key learning from the consultation process and:

- Looks at the prevalence of various forms of violence against women and girls within the borough
- Looks at the experience of female survivors of violence and provides an overview of what we currently know about local needs
- Provides an overview of the national and regional context of work on addressing violence against women and girls
- Provides an assessment of our current approach to tackling violence against women and girls in Tower Hamlets
- Highlights proposals made during the consultation on the way forward for tackling VAWG in Tower Hamlets

The violence against women and girls consultation involved:

- Consultation with professionals and partners through our local VAWG professional networks
- An on-line consultation
- Individual interviews with key stakeholders
- A series of focus groups held with local groups of survivors, women and young people

1. Borough Profile

Tower Hamlets is the 6th smallest London Borough and it is also the 4th most densely populated with a population of 287,100 usual residents.² The population is also extremely diverse with the single largest ethnic group being Bangladeshi (32%) with White British at 31%.³

Tower Hamlets also has one of the youngest populations in London and has the lowest median age in the country at 29 (the same as Newham) and 74.3% are aged between 16 and 64, with 48% aged 20-39 (19.9% are aged under 16).⁴

Tower Hamlets has a very mixed demography where there is a mixture of affluent and very deprived areas. Tower Hamlets has two of the richest and four of the poorest wards in London.

² GLA (2015) *London Borough Profiles*

³ Tower Hamlets (2013) *Ethnicity in Tower Hamlets: Analysis of 2011 Census*

⁴ *Ibid*

According to the Multiple Deprivation Index (MDI)⁵, Tower Hamlets is now the 24th most deprived boroughs in the country although is 3rd when ranked on the 'extent' measure.⁶

Violence against women and girls (VAWG) is a significant problem in the borough. The Violence Indicator Profiles for England (VIPER) show that Tower Hamlets has the sixth highest number of recorded sexual offences in England and the third highest in London, ranking 322 out of 326.⁷ In 2014/2015, Tower Hamlets had the 9th highest prevalence in London for Rape and 16th for sexual offences. This is not disaggregated by borough size or population.⁸

Tower Hamlets consistently has one of the highest rates of reported domestic abuse across London. Between November 2014 and November 2015 there were 2773 domestic crimes reported which is a 13.3% on the previous year and means that Tower Hamlets had the third highest rates of reporting in London (after Croydon and Greenwich).⁹

2. Tower Hamlets' Strategic approach to tackling violence against women and girls

The cross-cutting nature of the violence against women and girls agenda means that responsibility for tackling these issues cuts across a wide range of different agencies. Coordinating service provision and ensuring clear governance and accountability for this agenda is therefore a key challenge.

Violence against women and girls issues form part of our local partnership approach to improving safety in the borough. Tackling VAWG is a priority within the 2015 Community Plan's *A Safe and Cohesive Community* strand.¹⁰ Currently the oversight of violence against women and girls initiatives sits within the Community Safety Partnership (CSP) with sideways accountability to the Health and Wellbeing Board (HWB). Leadership locally is provided by the Community Safety Partnership.

Tower Hamlets has had a Domestic Violence Team for over 15 years and a specific action plan for at least 10 years, aimed at tackling domestic violence against anyone who is experiencing abuse. In 2013, the borough launched an additional strategy, the Violence Against Women and Girls (VAWG) Plan, aimed at addressing the disproportionate impact of gender-based violence on female residents of the borough and linked to existing VAWG Strategies across London, nationally and internationally. This consultation report relates to the updated VAWG Strategy 2016-2019, which will be launched in late 2016.

⁵ DCLG (2015) *The English Indices of Deprivation 2015, Statistical Release*, London: Department for Communities and Local Government. Tower Hamlets has become relatively less deprived since 2010 when it was the 7th most deprived borough in the country and was ranked 3rd in both the 2004 and 2007 indices.

⁶ Tower Hamlets has become relatively less deprived since 2010 when it was the 7th most deprived borough in the country and was ranked 3rd in both the 2004 and 2007 indices. 54% of all neighbourhoods in Tower Hamlets rank in the top 10% nationally and it is top in both the older people index and the young people index for the highest proportions living in an income deprived household.

⁷ Violence Indicator Profiles for England Resource (VIPER), available at: www.evipr.org.uk (last accessed 17.12.13)

⁸ Metropolitan Police Crime Mapping, available at: <http://maps.met.police.uk/tables.htm> (last accessed 11.01.16)

⁹ Metropolitan Police Crime Figures, available at: <http://www.met.police.uk/crimefigures/> (last accessed 11.01.16)

¹⁰ Tower Hamlets Community Plan 2015, available at:

http://www.towerhamlets.gov.uk/ignl/community_and_living/community_plan/community_plan.aspx
(last accessed 10.02.16)

3. National and Regional Initiatives

National Violence against Women and Girls Strategy

The Government published its *'Call to End Violence against Women and Girls'*¹¹ in November 2010 which was an update of the previous government's National Violence against Women and Girls Strategy. The strategy focused on four key areas: prevention, provision, partnership working and protection. The emphasis of the coalition's statement is very much on local prioritisation of these issues and the delivery of services at a local level. *'The coalition government's ambition is to ensure that tackling violence against women and girls is treated as a priority at every level. Greater decentralisation and our vision for Big Society will give local people a stronger voice in setting local priorities, and give local areas the means through which to understand what those priorities are.'*¹² However, the government did ring-fence nearly £40 million of stable funding up to 2015 for specialist local domestic and sexual violence support services, rape crisis centres, the national domestic violence helplines and the stalking helpline. This was supplemented by additional funding to support frontline organisations to tackle female genital mutilation, and to support services focusing on male victims of sexual and domestic violence.¹³ Funding from 2016 onwards is expected to be announced on or around International Women's Day (8th March) 2016, together with the new VAWG Strategy for the Conservative Government.

Although, since the original plan was published in 2010, the Government has published a number of progress reviews and action plans¹⁴, there has not yet been an updated strategy but, as outlined above, this is due imminently.

Regional Strategic Context

In November 2013, the Mayor of London published a refreshed version of his strategy to end violence against women and girls. The Mayoral Strategy continued the five key objectives from the previous strategy, *'The Way Forward'*:¹⁵

1. London taking a global lead to end violence against women
2. Improving access to support
3. Addressing the health, social and economic consequences of violence
4. Protecting women at risk
5. Getting tough with perpetrators.

¹¹ HM Government (2010) *Call to End Violence Against Women and Girls*, London: Home Office

¹² *Ibid*, page 7

¹³ Note these figures are taken from the Government's latest report, HM Government (2012) *What the Government has done to tackle Violence against Women and Girls*, London: Home Office, page 1

¹⁴ See for example: HM Government (2015) *A Call to End Violence Against Women and Girls: Progress Report 2010-2015*, London: Home Office

¹⁵ Mayor of London (2010) *The Way Forward: Taking Action to End Violence against Women and Girls*, Final Strategy 2010-2013, London: MOPAC

4. Violence against Women and Girls

Violence against Women and Girls (VAWG) is both a form of discrimination and a violation of human rights. Locally have adopted the United Nations Declaration on Elimination of Violence against Women¹⁶, which defines violence against women as:

'Any act of gender based violence that results in or is likely to result in physical, sexual or psychological harm or suffering to women [or girls], including threats of such acts, coercion or arbitrary deprivation of liberty' (1993, Article 1)

The definition incorporates a wide range of abusive behaviours including physical, sexual, financial, emotional and psychological abuse.

Violence against Women and Girls includes violence that is targeted at women or girls because of their gender or affects women and girls disproportionately.¹⁷ Examples of the types of violence included are:

- Sexual Violence
- Domestic Violence
- Trafficking
- Prostitution and Sex work
- Child Sexual Exploitation
- (Criminal) Gang related initiation practises against women and girls
- Female Genital Mutilation (FGM)
- Forced Marriage
- So- called 'Honour' Based Violence
- Dowry Related Abuse
- Harassment
- Stalking

Approximately 97% of all known victims of interpersonal violence in Tower Hamlets are female - a significant gender bias towards women. A Violence against Women and Girls approach sees the phenomenon of violence against women as both a cause and effect of fundamental inequalities between males and females. The Preamble to The UN Declaration on the Elimination of Violence against Women (1993) states that *"violence against women is a manifestation of historically unequal power relations between men and women, which have led to domination over and discrimination against women by men and to the prevention of the full advancement of women, and that violence against women is one of the crucial social mechanisms by which women are forced into a subordinate position compared with men."*¹⁸

It is important that Violence against Women and Girls (VAWG) is not seen as a series of incidents or assaults which an individual experiences. VAWG describes violent and oppressive patterns of behaviour and practises which achieve power and control over women and girls. It impacts on the

¹⁶ United Nations Declaration on Elimination of Violence towards Women (1993), <http://www.un.org/documents/ga/res/48/a48r104.htm> (last accessed 01.03.16)

¹⁷ See for example the United Nations Convention on Elimination of Discrimination against Women (1979), available at: <http://www.un.org/womenwatch/daw/cedaw/> (last accessed 08.02.13)

¹⁸ *Op. Cit.*, footnote 16

physical safety, health and emotional well-being of individuals and impacts on families, carers, children and the community as a whole.

Abuse can take place, however, regardless of gender, ethnicity, faith, sexuality or age. Whilst we recognise that that the issues in this plan have a disproportionate effect on women, we also recognise that boys and men are victims of violence too. As a local area we remain committed to providing support for all victims of abuse and the intention of this plan is to strengthen our response to responding to abuse rather than undermining this approach.

Sexual violence and abuse

The World Health Organization (WHO) has defined sexual violence as “*any sexual act, attempt to obtain a sexual act, unwanted sexual comments or advances, or acts to traffic, or otherwise directed, against a person’s sexuality using coercion, by any person regardless of their relationship to the victim, in any setting, including but not limited to home and work.*”¹⁹ It includes rape, sexual assault, sexual harassment/ bullying, sexual exploitation (coercion and exploitation in the sex industry), and trafficking.

Rape and sexual assault

The Sexual Offences Act 2003, which came into force in May 2004, strengthens the law on sexual offences and extends the definition of rape as well as clearly defining the concept of consent.²⁰ Rape and sexual assault affect women disproportionately, with women three times more likely to be victims of rape and sexual assault than men.²¹ The 2014/2015 England and Wales Crime Survey²² report by the Office for National Statistics (ONS) showed that there has been a 36% increase in all sexual offences for the year ending September 2015 meaning it is the highest since the figures starting being recorded in 2002. The sexual offences of rape (33,431 offences) and other sexual offences (61,178 offences) increased by 39% and 35% respectively. The increase in reporting has been attributed to a number of factors including increase in reporting of historic sexual abuse and inspections by HMIC²³ which highlighted the need to better record and investigate sexual offences. Sexual violence is identified as a high risk factor in domestic violence cases.

There is a particularly young profile to those accessing services for rape and sexual assault. For example, young women represent approximately 30% of rape victims accessing London’s Haven Centres²⁴ and 64% of victims of multiple perpetrator rape in London are under 19 years old²⁵. A 2009 study by the NSPCC and the University of Bristol which questioned 1,353 young people (aged between 13 and 17 years old) on violence in their intimate partner relationships found that 33% of

¹⁹ WHO (2002) *World Report on Violence and Health*, Geneva: World Health Organization, page 149

²⁰ The definition of rape was extended to include the penetration by a penis of the vagina, anus or mouth. Sexual Offences Act (2003), available at: <http://www.legislation.gov.uk/ukpga/2003/42/contents> (last accessed 01.03.16)

²¹ ONS (2013) *Focus on: Violence Crimes and Sexual Offences, 2011/2012*, Newport: Office for National Statistics

²² ONS, (2016) *Crime in England and Wales: Year ending September 2015*, Newport: Office for National Statistics

²³ HMIC (2014) *Crime-Recording: Making the Victim Count*, London: Her Majesty’s Inspectorate of Constabulary

²⁴ The Havens (2008), *Annual Statistics*

²⁵ Commander Simon Foy (Head of the Metropolitan Police’s Homicide and Serious Crime Command Unit), cited in Daily Mail Newspaper, 5th November 2009

girls and 16% of boys had experienced some form of sexual abuse.²⁶ The young women and professionals working with young people we spoke to as part of the consultation were particularly concerned about sexual harassment and sexual violence issues, especially the increase in online abuse.

Attitudinally, a 2015 report²⁷ shows that young people (aged between 16 and 19) are most likely to believe that a person should take some responsibility for sexual assault or rape if they have were drunk (34%), taking drugs (45%) or flirting with their attacker (46%).

Research suggests that sexual offences are significantly under-reported.²⁸ The Crime Survey England and Wales self-completion module on inter-personal violence consistently finds that only a small number of victims of domestic and sexual violence report to the police.

Between October 2014 and September 2015, there were 323 offences of rape and serious sexual offences recorded by the police in Tower Hamlets, an increase of 29.7% on the previous year.²⁹ From April 2014 - March 2015 there were 83 cases to MARAC with sexual violence as an indicator and 3 cases for men.

There are currently three main models of service provision for victims of sexual violence in Tower Hamlets:

- East London Rape Crisis– offers specialist support. Their services include emotional and practical support, one-to-one counselling, group support and advocacy for women over the age of 14.
- The Havens – provide support and medical care to men, women and young people who have experienced rape or serious sexual assault in the last 12 months with the aim of minimising the subsequent physical and mental difficulties. The Havens is located in Whitechapel.
- ISVA – Independent Sexual Violence Advisor service for sex working women who have experienced sexual violence.

Domestic violence

The cross-Government definition of domestic violence was changed in September 2012 (and is due to be implemented in March 2013). The definition was widened to 'domestic violence and abuse' and also to include those 16-17 and coercive control for the first time.

The definition of domestic violence and abuse now states:

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members

²⁶ Barter, C., McCarry, M., Berridge, D. and Evans, K. (2009) *Partner Exploitation and violence in teenage intimate relationships*, London: NSPCC and the University of Bristol

²⁷ Barrett, D. (2015) 'Drunk or flirty rape victims often 'to blame' says survey', *The Telegraph*, 12th February 2015. Barrett was speaking about the ONS (2015) *Findings from the 2013/2014 Crime Survey for England and Wales*

²⁸ See for example: Taylor, C. and Gassner, L. (2010) 'Stemming the flow: challenges for policing adult sexual assault with regard to attrition rates and under-reporting of sexual offences', *Policy Practice and Research: An International Journal*, 11(3)

²⁹ Tower Hamlets (2016) *Community Safety Partnership Strategic Assessment 2015*

regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:

- psychological
- physical
- sexual
- financial
- emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

This definition, which is not a legal definition, includes so-called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

According to the 2013/2014 Crime Survey England and Wales³⁰ it is estimated that around 28.3% of women will experience domestic violence at some point in their lives from the age of 16 and 8.5% (4.4% of men) experienced abusive behaviour from a partner or family member within the last 12 months, equivalent to 1.4 million female victims. This would mean that in Tower Hamlets around almost 5,000 women are currently experiencing domestic violence and over 20,000 women are living with the legacy of past domestic violence.³¹

This figure is supported by official reporting rates to the police, taking into account underreporting of abuse. Tower Hamlets consistently has one of the highest rates of reported domestic abuse across London. Between November 2014 and November 2015 there were 2773 domestic crimes reported which is a 13.3% on the previous year and means that Tower Hamlets had the third highest rates of reporting in London (after Croydon and Greenwich).³²

In 2013/14, almost half (46%) of female victims aged 16 or over had been killed by their partner, ex-partner or lover (84 offences) and 80% of all female homicide victims were acquainted with their killer. In contrast, only 7% of male victims aged 16 or over were killed by their partner, ex-partner or lover. Over a third (37%) of female murder victims were murdered with a sharp instrument and 18% strangled or asphyxiated.³³

In December 2015 a new criminal offence of Controlling and Coercive behaviour came into force. The offence is contained within Section 76 of the Serious Crime Act 2015. This will have an impact

³⁰ *Op Cit.*, ONS Report

³¹ Using the Home Office 'Ready Reckoner' tool it is estimated that almost 6,000 women aged 16-59 have been a victim of domestic abuse in the past year; 5,336 have been the victim of a sexual assault and 10,568 have been a victim of stalking.

³² Metropolitan Police Crime Figures, available at: <http://www.met.police.uk/crimefigures/> (last accessed 11.01.16)

³³ ONS (2015) 'Chapter 2: Violence Crime and Sexual Offences – Homicide', in Findings from the 2013/2014 Crime Survey for England and Wales, Newport, Office for National Statistics

on the number of cases that we will see through all of the domestic violence services in the borough.

Tower Hamlets has developed a coordinated response to domestic violence that includes:

- Multi-agency reporting and referral procedures
- A multi-agency risk assessment process which includes the MARAC
- The partnership campaign 'Domestic Abuse, No Excuse'
- Domestic Violence One-Stop-Shop
- Specialist Domestic Violence Court
- Specialist information and advice surgeries at the Housing Options Team and at the Barkantine Medical Centre
- Independent Domestic Violence Advisers (IDVAs)
- Specialist accommodation for those fleeing violence
- IRIS Domestic Abuse service within GP Practices
- Floating support services

Our partnership response to tackling domestic violence is overseen by the Tower Hamlets Domestic Violence Forum which is an umbrella body for organisations working with families experiencing domestic violence in the borough. The Forum is responsible for the annual Domestic Violence Action Plan which sets out our commitment to address four key objectives:

- Safe choices for adult victims of domestic violence
- Improving safety of children affected by domestic violence
- Holding perpetrators accountable
- Challenging social tolerance to domestic violence

Harmful Practices ('honour' based violence, forced marriage and female genital mutilation)

*"Certain cultural norms have long been cited as causal factors for violence against women, including the beliefs associated with "harmful traditional practices" (such as female genital mutilation/cutting, child marriage and son preference), crimes committed in the name of "honour", discriminatory criminal punishments imposed under religiously based laws, and restrictions on women's rights in marriage."*³⁴

Again, as with many areas of VAWG, there is likely to be gross underreporting of so-called 'honour' based violence, forced marriage and female genital mutilation. A report published by Her Majesty's Inspectorate of Constabulary (HMIC) in 2015 highlighted that the police are still not adequately prepared to deal with cases of harmful practices.³⁵

To address these levels of underreporting and to improve responses to survivors as well as to improve professionals' practice, Tower Hamlets has been working with the Mayor's Office for Policing and Crime (MOPAC), the Department for Education (DfE) and a number of other London boroughs on a pilot programme to address all of these strands of VAWG. The pilot combines

³⁴ Report of the Secretary General to the General Assembly, (2006) *In-depth study on all forms of violence against women*, Report A/61/122/Add.1, page 30

³⁵ HMIC (2015) *The depths of dishonour: Hidden voices and shameful crimes*, London: Her Majesty's Inspectorate of Constabulary

training with capacity building support for professionals. We anticipate that the figures will increase over the period as professionals have increased awareness of forced marriage, so-called 'honour' based violence and female genital mutilation.

So-called 'Honour' Based Violence

So-called 'honour' based violence is a term used to describe violence committed against a woman where her family or the wider community feels she has not followed what they believe is acceptable behaviour and has brought dishonour or shame to the family. It is based on the belief that women are commodities and the property of male relatives and women's bodies are the repositories of the family's honour.³⁶ It is not a religious based issue – it has been recorded in communities practising every major religion, including Jewish, Sikh, Christian, Hindu and Muslim communities. The underlying belief behind so-called 'honour' based violence is to maintain the control over women by the men within the family or community by denying women autonomy over their lives – including decisions such as who to marry, their sex lives or divorce and the rights guaranteed by a wide range of international human rights mechanisms.

Although it should be always viewed in the context of wider gender based violence, so called 'honour'-based violence is different from domestic violence in that it involves perpetration of violence by more than one perpetrator usually from within the family or the wider community. IKWRO³⁷ suggest a number of factors that separate so-called 'honour' based violence from domestic violence:

- Gender relations that problematise and control women's behaviour, shaping and controlling women's sexuality in particular
- Women may play a role policing and monitoring the behaviour of other women
- Collective decisions regarding punishment, or in upholding the action considered appropriate, for the transgression of these boundaries
- Premeditation
- The potential for women's participation in killings
- The ability to reclaim 'honour' through enforced compliance or killings
- 'Honour' killings may occur publically or theatrically in order to demonstrate 'honour' reclaimed and to terrorise other women into accepting male control
- In some cases, there is state sanction of such killings through recognition of 'honour' as a mitigating factor

Women and girls can experience violence or, in the most extreme form, be killed for a wide variety of behaviours, which can range from very trivial, such as talking to a male who is not a relative to being sexually assaulted or raped. Some common 'behaviours' are:

- Defying their parents

³⁶ For a wider discussion of so-called 'honour based violence see: for example: Brandon, J. and Hafez, S., (2008), *Crimes of the Community: Honour-Based Violence in the UK*, London: Centre for Social Cohesion; Watts, C. and Zimmerman, C. (2002), 'Violence against women: global scope and magnitude', *The Lancet*, 359; Welchman, L. and Hossain, S. (2005), *'Honour': Crimes, Paradigms, and Violence against Women*, London, Zed Books and Terman, R. (2010), 'To specify or single out: Should we use the term "Honor Killing"?', *Muslim World Journal of Human Rights*, 7(1)

³⁷ IKWRO is The Iranian and Kurdish Women's Rights Organisation, www.ikwro.org.uk and www.stophonourkillings.com

- Talking to a male who is not related to the family
- Seeking a divorce or seeking residence of the children after divorce
- Refusing to marry a man chosen by the family (rejecting a forced marriage)
- Sexual relationships or pregnancy before or outside of marriage (including kissing or intimacy in public)
- Becoming 'western' (wearing make-up or clothes deemed inappropriate, having male friends or boyfriends from another faith etc.)
- Gossip (rumours can damage the 'honour' of a family)
- Using drugs or drinking alcohol
- Being sexually assaulted or raped
- Being homosexual

Worldwide, it is believed that there is gross underreporting of honour killings and so-called 'honour' based violence. The UN believes that there are around 5000 women murdered in the name of honour each year, but reports do also acknowledge that this figure is probably low compared to real figures. The UN has also recorded honour killings as happening in Bangladesh, Brazil, Ecuador, Egypt, India, Israel, Italy, Jordan, Morocco, Pakistan, Sweden, Turkey, Uganda and the UK.³⁸ Government reports to the Committee on the Elimination of all Forms of Discrimination against Women have reported that between 1988 and 2003, 4000 men and women were murdered in Pakistan with the number of women killed more than double that of men.³⁹

In the UK, IKWRO's research published in 2015 found that there were more than 11,000 incidents of 'honour' based violence reported to the police between 2010 and 2014.⁴⁰ In the UK, it is thought that there are 12 'honour' related killings each year⁴¹, although there are no published statistics in this area. A report by the Henry Jackson Foundation found that there had been 18 'honour' related killings between 2010 and 2014, and a further 11 attempted killings.⁴²

In Tower Hamlets, between October 2012 and September 2015 there were 23 cases of so-called 'honour' based violence reported to the police. Additionally since data has been recorded separately by the VAWG Steering Group there has been an increase in cases to MARAC. 10 cases were referred to the MARAC between October 2014 and September 2015.

Forced marriage

'A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and

³⁸ The figure of 5000 women a year is from UNFPA, (2000), *State of the World's Population*, This is the figure used in later reports including the UN Secretary General's 2006 report which acknowledges underreporting: Report of the Secretary General to the General Assembly, (2006) *In-depth study on all forms of violence against women*, Report A/61/122/Add.1

³⁹ Combined initial, second and third reports of Pakistan submitted under Article 18 of the Convention on the Elimination of all Forms of Discrimination against Women, Para. 529, cited in *Ibid*, page 40.

⁴⁰ IKWRO (2015) 'In only five years, police record more than 11,000 'honour' based violence cases', available at: <http://ikwro.org.uk/2015/07/research-reveals-violence/#more-2539> (last accessed 01.03.16)

⁴¹ The statistic of 12 killings a year is widely cited without any original source, nor is the statistic of 114 murder cases, which is also widely cited. Both statistics and the figures from the Metropolitan Police are available within the *Home Office Equality Impact Assessment, Violent and Youth Crime Prevention Unit*, published on the 30.03.11

⁴² Dyer, E. (2015) *'Honour Killings in the UK'*, London, Henry Jackson Foundation

indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.⁴³

Forced marriage is not condoned by any of the major religions (consent is a prerequisite for marriage in all Christian, Hindu, Muslim, Sikh and Jewish marriages) and is a violation of human rights as well as a form of domestic violence.

Forced marriage affects young women disproportionately to young men. In 2014 the Forced Marriage Unit (FMU) gave advice or support to 1267 cases. 79% of these cases involved females and 21% involved males.⁴⁴ However, research shows that the figures of forced marriage (actual and threats of forced marriage) are much higher with the prevalence of reported cases estimated as between 5,000 and 8,000 young people each year. The actual cases of forced marriage are estimated to be far higher as many cases are never reported. A report commissioned by Margaret Moran, the Home Office and the Metropolitan Police in 2008 found that over 300 young people approached organisations in the Luton Area alone.⁴⁵

Forced marriage is recognised as a form of domestic violence – it is a form of exerting power and control over a person's choices. There are strong links between forced marriage and so-called 'honour-based' violence whereby a person who does not consent is seen to be dishonouring or shaming the family. There are a wide range of reason given by parents and the wider family and community for forcing young people into marriages. Parents say that they are protecting their cultural heritage, building stronger family links or religious traditions.

Other major reasons include: controlling young people's sexuality, especially young women who perceived to be promiscuous or young people who are lesbian or gay; ensuring that land or property remains within the family or gaining financially; preventing seemingly 'unsuitable' relationships (outside of caste, religion or culture) and provision of long-term care for a child who has a disability (learning or physical).

In Tower Hamlets, 2 cases of forced marriage were referred to the MARAC between October 2014 and September 2015. Again, this highlights the massive levels of underreporting of this strand of VAWG or the lack of understanding of professionals to adequately identify and support survivors.

Female genital mutilation (FGM)

Female genital mutilation (FGM) comprises "all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons."⁴⁶

The communities in the UK that girls are most at risk of FGM include the Somali, Sudanese, Sierra Leone, Gambian, Liberian, Egyptian, Nigerian, Ethiopian and Eritrean communities. Non-African

⁴³ FCO and Home Office (2015) 'Forced Marriage', available at: <https://www.gov.uk/guidance/forced-marriage> (last accessed 24.02.16)

⁴⁴ Forced Marriage Unit (2015) *Statistics on Forced Marriage for 2014*, London: Foreign and Commonwealth Office and Home Office

⁴⁵ Khanum, N., (2008), *Forced Marriage, Family Cohesion and Community Engagement: National Learning through a case study of Luton*, London: Equality in Diversity

⁴⁶ WHO, (2010), Female Genital Mutilation, World Health Organization Fact Sheet No. 241, available at: <http://tinyurl.com/lvsjl> (last accessed 08.03.11)

communities that practice FGM include Yemeni, Afghani, Kurdish, Indonesian, Malaysian and Pakistani Bohra Muslim communities.

UNICEF has estimated that more than 125 million girls and women globally have undergone FGM and that 3 million girls in Africa are at risk each year⁴⁷

The organisation Forward has estimated that 20,000 girls under 15 are at high risk of FGM in England and Wales each year.⁴⁸ The risk is highest for primary school girls however all young women from backgrounds where FGM is prevalent are at risk.

Recent research by Professor Alison Macfarlane and Efua Dorkenoo⁴⁹ included analysis of census data and medical data and linking this in with migration data. They have also compared this to global data on countries that practise FGM and the type they practise. As a result of the gathered data they estimate:

- The prevalence of FGM among women aged 15 and over
- The estimated numbers of maternities which were to women who have undergone FGM
- The numbers of girls aged under 15 with or at risk of FGM and the type of FGM.

The conclusions are as follows:

- Around 103,000 women aged 15-49 living in England and Wales are from FGM practising countries.
- Nearly 53,000 came from countries in the Horn of Africa where FGM is virtually universal and Type III is commonly practised.
- Women aged 50 or more with FGM – about 24,000 (9,400 came from countries where FGM is almost universal with Type III; 5,600 coming from countries with almost universal FGM, usually Types I and II.)
- Those under 15 - just under 24,000 girls aged 0-14 born in FGM practising countries were living in England Wales in 2011. They estimated that if they experience FGM at the same rate as girls aged 15-19 in their countries of birth, then nearly 10,000 of them have undergone or will undergo FGM.
- Nearly 4200 temporary residents born in FGM practising countries were enumerated, of whom just over 900 came from countries where FGM is almost universal.
- the number of pregnant women who had undergone FGM increased steeply over the years 2001 to 2004
- The estimated numbers of maternities to women with FGM increased from just over 9,000 in 2005 to nearly 11,000 in 2008, since when the numbers have levelled off.
- From 1996 to 2010, 144,000 girls were born in England and Wales to mothers born in FGM practising countries and a further 29,000 were born in 2011 and 2012.

⁴⁷ UNICEF, *Female Genital Mutilation/Cutting: A Statistical Overview and Exploration of the Dynamics of Change* (New York, 2013).

⁴⁸ Macfarlane, A., Morison, L. and Dorkenoo, E. (2007) 'A Statistical Study to Estimate the Prevalence of Female Genital Mutilation in England and Wales, Summary Report,' Available online at: <http://www.forwarduk.org.uk/key-issues/fgm/research>, (last accessed 18.09.14)

⁴⁹ Macfarlane, A. and Dorkenoo, E. (2014) *Female Genital Mutilation in England and Wales: Updated statistical estimates of the numbers of affected women living in England and Wales and girls at risk: Interim report on provisional estimates* (London, City University and Equality Now funded by Trust for London and the Home Office, p. 14.

- 60,000 of the girls aged 0-14 born before 2011 and 11,700 of those born in 2011 and 2012 were born to mothers with FGM.
- In both cases, well over half of the mothers came from the countries in the Horn of Africa where FGM is almost universal and Type III is practised and slightly under a fifth came from the countries in West and East Africa where Types I and II are highly prevalent.

Thus the report suggests that while in overall terms, the increase was in numbers of girls born to women born in countries in Group 2, where prevalence is in the medium range, the increase in numbers of girls born to mothers with FGM related particularly to those from countries where FGM is nearly universal and Type III is commonly practised.

Overall the report suggests that the figure of 20,000 girls at risk was an underestimation and that in turn it is likely that due to migration from FGM practicing countries there has been a rise in women who may have undergone FGM that may need specialist healthcare support.

The origin of FGM is complex and it has not been clearly established, but it is known that it predates both Christianity and Islam.⁵⁰ The World Health Organization (WHO) has said that the perpetuation of FGM is because *it functions as a self-enforcing social convention or social norm. In societies where it is practised, it is a socially upheld behavioural rule. Families and individuals continue to perform it because they believe that their community expects them to do so. They further expect that if they do not respect the social rule, they will suffer social consequences such as derision, marginalization and loss of status*⁵¹.

A study by FORWARD⁵² found that FGM is perpetuated in the UK for the following main reasons:

- The fact that it is a longstanding tradition which contributes to cultural Identity
- That uncircumcised girls and their families are looked down upon by neighbours and extended family members
- The aim of controlling female sexuality both before and during marriage
- The perception that it is necessary for women's marriageability
- The perception that men desire a circumcised wife for their sexual pleasure
- Ideas around cleanliness

Recent research published by City University and Equality Now⁵³ has established estimates of the numbers of women and girls affected per borough across England and Wales.

⁵⁰ For a discussion of the origins of FGM see: Office of the High Commissioner for Human Rights, Fact Sheet No.23, Harmful Traditional Practices Affecting the Health of Women and Children, available online at: <http://www.ohchr.org/Documents/Publications/FactSheet23en.pdf> (last accessed 08.03.11) and FORWARD, (2002), Female Genital Mutilation Information Pack, available at: <http://tinyurl.com/blaxgob> (last accessed 08.03.11)

⁵¹ WHO (2010), *Global strategy to stop health-care providers from performing female genital mutilation*, Geneva: UNAIDS, UNDP, UNFPA, UNHCR, UNICEF, UNIFEM, WHO, FIGO, ICN, IOM, MWIA, WCPT, WMA, page 2.

⁵² Dorkenoo, E., Morison, L. and MacFarlane, A., (2007), *A Statistical Study to Estimate the Prevalence of Female Genital Mutilation in England and Wales*, London: Foundation for Women's Health, Research and Development (FORWARD) in collaboration with the London School of Hygiene and Tropical Medicine and the Department of Midwifery, City University.

⁵³ Macfarlane, A. and Dorkenoo, E. (2015) 'Prevalence of Female Genital Mutilation in England and Wales: National and Local Estimates', London: City University and Equality Now. The table above is based on Table 11, Numbers of Women born in FGM-practising countries, and estimated numbers with FGM by age group and region and local authority area.

	Age 0-14	Age 15-49	Age 50+	Total
Estimated numbers of women with FGM	153	1780	468	2401
Estimated prevalence per 1000 population	6.5	22.3	23.5	19.5
Number of women born in FGM practising countries and permanently resident in England and Wales (2011 Census)	211	2979	881	4071

Prostitution

Street based prostitution is dangerous and has serious risks for women. Women involved in prostitution⁵⁴ are often extremely vulnerable to sexual exploitation. Research has shown that many are poor, homeless and have already suffered violence and abuse throughout their life.⁵⁵ 85% of women involved in prostitution report a history of physical abuse and 45% report childhood sexual abuse⁵⁶. It is estimated that as many as 95% involved in prostitution have a drug or alcohol addiction⁵⁷.

Those involved in prostitution are likely to be at increased risk of violent and abusive behaviour. Three quarters of women involved in prostitution in the United Kingdom have been physically assaulted and more than half have been raped and/or seriously sexually assaulted.⁵⁸ Women may be coerced into prostitution by pimps or traffickers. A 2010 study into the nature and scale of trafficking of migrant women in the UK estimated that of the 75,000 migrant women thought to be involved in off-street prostitution in the UK, 2600 have been trafficked into the UK.⁵⁹ There is also a key concern that research has identified that between 50% – 76% of women involved in prostitution started before the age of 21, depending on the study, outlining the need to identify prostitution and correspondingly child sexual exploitation as a child protection issue.⁶⁰

⁵⁴ The term ‘women involved in prostitution’ is used throughout this document as ‘prostitute’ or ‘sex workers’ are both value-laden terms which do not recognise prostitution as a form of commercial sexual exploitation. Using the term ‘individuals involved in prostitution’ builds on Tower Hamlets’ approach to tackling commercial sexual exploitation for all people involved in prostitution including men, transgender people, BME groups and so on. For more information see for example, Home Office (2011) *A Review of Effective Practice in Responding to Prostitution*, London: Home Office.

⁵⁵ See for example Dodsworth, J. (2011) ‘Pathways through Sex Work: Childhood Experiences and Adult Identities’, *British Journal of Social Work*

⁵⁶ Home Office (2004) *Paying the Price: A Consultation Paper on Prostitution*, London: Home Office

⁵⁷ Melrose, M. (2002), *Ties that bind - Young People and the Prostitution Labour Market in Britain* presented at Fourth Feminist Research Conference, Bologna: September 2000.

⁵⁸ Hester, M. and Westmarland, N. (2004) *Tackling Street Prostitution: Towards an holistic approach*, Home Office Research Study 279, London: Home Office.

⁵⁹ Jackson, K., Jeffery, J. and Adamson, G. (2010) *Setting the record straight: The Trafficking of Migrant Women in the England and Wales Off-street Prostitution Sector*, London: Association of Chief Police Officers, Project Acumen.

⁶⁰ See for example: Hester and Westmarland, *op cit.*; Bindel, J. (2006) *No Escape? An Investigation into London’s Service Provision for Women Involved in the Commercial Sex Industry*, London: Poppy Project, EAVES; Dickson, S. (2003) *Sex in the City: Mapping Commercial Sex Across London*, London: Poppy Project, EAVES and Bindel, J., Brown, L., Easton, H., Matthews, R. and Reynolds, L. (2012) *Breaking Down the Barriers: A Study of how women exit prostitution*, London: EAVES and London South Bank University.

Local approach

Tower Hamlets approach to tackling prostitution is coordinated by the Prostitution Response Coordinator through the Tower Hamlets' Prostitution Partnership which is a multi-agency group made up of key statutory and voluntary agencies across the borough. The Partnership has developed a model which:

- Provides women with access to services that reduce harm and support change including exiting prostitution
- Increases women's confidence to report crime and access safety
- Reduces demand for prostitution and re-offending
- Focuses public discourse on tackling demand for prostitution and developing holistic support for those who sell sex

Trafficking

Trafficking is defined as: 'The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power, or a position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs'.⁶¹

The organisation AVA has noted that the majority of women involved in off-street prostitution in London are migrants, although estimates vary. Research by the Poppy Project found only 19% of women working as prostitutes in flats, parlours and saunas are originally from the UK, compared with just 3.6% of women in the off-street sector in London found to be British as part of Project Acumen, a police-led research initiative.⁶²

Sexual harassment and sexual bullying

Sexual harassment is usually defined as any unwanted sexual attention, requests for sexual favours or unwanted verbal or physical behaviour of a sexual nature. It can take many forms including sexually explicit remarks, flashing, obscene and threatening calls and online harassment. It can take place anywhere, including the workplace, schools, streets, public transport and social situations.

Studies provide widely different estimates of the prevalence of sexual harassment. However, research suggests that sexual harassment is likely to be widespread but also largely underreported.⁶³ The Everyday Sexism campaign which was set up to catalogue the experiences of

⁶¹ Article 3 of the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially women and children (2000), is one of the 3 protocols to the UN Convention Against Transnational Organizational Crime. This protocol is commonly referred to as 'the Palermo Protocol'. The protocol entered into force on 25th December 2003.

⁶² Information from, The Poppy Project (2004), *Sex in the City: Mapping Commercial Sex Across London*, London: The Poppy Project; Jackson, K. Jeffery, J. and Adamson G. (2010) *Setting the Record: The Trafficking of Migrant Women in the England and Wales Off-Street Prostitution Sector*, London: Project Acumen.

⁶³ Hunt, C., Davidson, M., Fielden, S. and Hoel, H. (2007) *Sexual harassment in the workplace: a literature review*, Manchester: The Centre for Equality and Diversity at Work, University of Manchester; Hunt, C., Davidson, M., Fielden,

women being sexual harassed on a regular basis has received over 100,000 submissions between since its inception in April 2012.⁶⁴

A 2010 YouGov poll for EVAW⁶⁵ found that almost one in three 16-18 year old girls stated they have been subjected to unwanted sexual touching at school. A further 71% of 16-18 year olds (girls and boys) said they had heard sexual name calling with terms such as 'slut' or 'slag' used towards girls at school on a daily basis or a few times a week. In a survey for the National Union of Teachers, half of respondents (49%) had witnessed sexist language and over a third (38%) had witnessed sexual bullying between students.⁶⁶ However, the EVAW poll found that almost 25% of those polled said their teachers never said unwanted sexual touching, sharing of sexual pictures or sexual name calling were unacceptable. A report of a survey of 1574 by Girlguiding in 2015 found that 81 percent of girls have experienced sexism; 42% had seen something that trivialised VAWG and 39% had demeaning comments made about them.⁶⁷

Stalking and Harassment

Although harassment is not specifically defined it can include '*repeated attempts to impose unwanted communications and contacts upon a victim in a manner that could be expected to cause distress or fear in any reasonable person.*'⁶⁸ Again, there is no strict legal definition of stalking but the Protection from Harassment Act (as amended by the Protection of Freedoms Act 2012) sets out what examples of what can constitute stalking: physical following; contacting, or attempting to contact a person by any means (this may be through friends, work colleagues, family or technology); or, other intrusions into the victim's privacy such as loitering in a particular place or watching or spying on a person.

On 25 November 2012, two specific criminal offences of 'stalking' and 'stalking involving fear of violence or alarm or distress' came into force in England and Wales, along with additional related police search powers. The offences were introduced by the Protection of Freedoms Act 2012⁶⁹, which amends the Protection from Harassment Act 1997. Section 2A of the 1997 Act prohibits a person from pursuing a course of conduct that amounts to stalking and Section 2B sets out new police powers to enter and search premises in relation to the 2A offence.⁷⁰

According to the 2013/14 Crime Survey for England and Wales, 21.5% of women had been subject to stalking or harassment at some point in their lifetime and 4.4% had experienced stalking in the previous year.⁷¹ Using the Home Office VAWG Ready Reckoner tool, it is estimated that in Tower Hamlets over 10,000 women will have been subjected to stalking in the past 12 months.⁷² 143 of

S. and Hoel, H., (2010) "Reviewing sexual harassment in the workplace – an intervention model", *Personnel Review*, 39(5), pp.655 – 673.

⁶⁴Smith, L., (2014) 'Everyday Sexism's Laura Bates 'Awareness-raising has become a worldwide movement for equality', *International Business Times*, 15.04.15

⁶⁵ End Violence Against Women and YouGov, (2010) *Sexual Harassment in UK Schools Poll*, London: EVAW

⁶⁶ O'Neill, S. (2007) A serious business: An NUT survey of teachers' experience of sexism and harassment in schools and colleges, Institute of Education and University of Warwick.

⁶⁷ Girlguiding, (2015) *Girls' Attitude Survey 2015*, London, Girlguiding

⁶⁸ CPS (2012) *Stalking and Harassment: Guidance for Prosecutors*, London: Crime Prosecution Service

⁶⁹ Protection of Freedoms Act 2012, <http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>

⁷⁰ Home Office, (2012) *A change to the Protection from Harassment Act 1997: introduction of two new specific offences of stalking*, London: Home Office Circular, 018/2012.

⁷¹ Chaplin, R., Flatley, J. and Smith, K. (Eds.) (2011) *Crime in England and Wales 2010/11 Findings from the British Crime Survey and police recorded crime (2nd Edition)*, Home Office and ONS.

⁷² Home Office, *VAWG Ready Reckoner*,

the 401 women referred to MARAC in 2014/2015 had experienced stalking from their current or former partner.

Studies have found women and younger women are most likely to be victims of stalking and harassment.⁷³ Stalking and harassment was another area the women we spoke to as part of the violence against women and girls consultation were particularly concerned about.

Stalking and harassment are overwhelmingly associated with ex-intimate partners and there is therefore a strong link to domestic violence. Stalking is a high risk factor in domestic violence cases linked to domestic homicides. Our local approach to tackling these issues is therefore linked particularly to our approach to addressing domestic violence, including holding perpetrators accountable.

Child Sexual Exploitation

The sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person/persons) receive “something” (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of performing, and/or others performing on them, sexual activities.⁷⁴

The ‘grooming’ process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, sometimes over a long period of time, before the abuse begins.

The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim’s options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited.⁷⁵

Child sexual exploitation can have a devastating impact on a victim’s health, happiness and development. It can also have profound long-term effects on young people’s social integration and economic well-being and adversely affects life chances.⁷⁶

<http://webarchive.nationalarchives.gov.uk/20100104215220/http://crimereduction.homeoffice.gov.uk/domesticviolence/domesticviolence072.htm> (last accessed 01.03.16).

⁷³ Sheridan, L. (2005) *Stalking Survey*, University of Leicester

⁷⁴ This is the agreed Association of Chief Police Officers (ACPO) definition which is used in the Pan London Child Sexual Exploitation Operating Protocol published in February 2014. London Safeguarding Children Board (2014) *Pan-London Child Sexual Exploitation Operating Protocol*, London. Tower Hamlets is due to publish their CSE Guidelines (mapped to the London Protocol) in Spring 2014.

⁷⁵ Barnardo’s (2012) *Cutting them free: how is the UK progressing in protecting its children from sexual exploitation*, London: Barnardo’s.

⁷⁶ NSPCC, Child Sexual Exploitation – Introduction, available at:

http://www.nspcc.org.uk/Inform/resourcesforprofessionals/sexualabuse/cse-introduction_wda97566.html, (last accessed 04.03.16)

SECTION 2 – IMPACT OF VIOLENCE AGAINST WOMEN AND GIRLS

Impact on children and young people

Violence against women and girls has a significant impact on the safety and wellbeing of children and young people.⁷⁷

- Out of 1267 cases that the Forced Marriage Unit gave advice to in 2014, 39% involved young people under the age of 21 with 11% under 16.⁷⁸ There are cases of children as young as nine being forced into marriage.
- Female genital mutilation is predominantly carried out on young women aged 15 and under⁷⁹
- A 2009 NSPCC survey of 13-17 year olds found that a quarter of girls had experienced physical partner violence, three quarters had experienced emotional partner violence and a third had experienced sexual partner violence⁸⁰
- Up to 70% of teenage mothers have experienced domestic violence in their own intimate relationships⁸¹
- More than one third of all rapes recorded by the Police are committed against children under 16 years of age⁸²

Children and young people can be extremely affected by their experiences of living with violence. The impacts can be physical, behavioural, psychological or educational and they can also be long-term or short-term impacts.⁸³ The way that children can be impacted depends on a wide range of factors including: age and developmental stage, gender, ethnicity, position within the family, sexuality, disability, their relationship with their mother, whether the abuse was direct or indirect, their access to safety and existence of support networks.

“Children exposed to sudden, unexpected man-made violence appear to be more vulnerable – making the millions of children growing up with domestic violence...at great risk for profound emotional, behavioral, physiological, cognitive, and social problems.”⁸⁴

⁷⁷ See for example: Geffner, R., Spurling Igelman, R. and Zellner, J. (2013) *The Effects of Intimate Partner Violence on Children*, New York: Routledge; Humphreys, C. and Stanley, N. (2015) *Domestic Violence and Protecting Children: New Thinking and Approaches*, London: Jessica Kingsley Publishers

⁷⁸ Forced Marriage Unit (2015) *Statistics on Forced Marriage for 2014*, London: Foreign and Commonwealth Office and Home Office

⁷⁹ WHO (2016) *Female Genital Mutilation*, available at: <http://www.who.int/mediacentre/factsheets/fs241/en/> (last accessed 01.03.16)

⁸⁰ Barter *et al*, *Op cit.*, footnote 27.

⁸¹ Harrykisson, S., Vaughn, R. and Wiemann, C. (2002) *Prevalence and patterns of intimate partner violence among adolescent mothers during the postpartum period*, Archives of Paediatrics and Adolescent Medicine, 156(4).

⁸² Walker, A. Kershaw, C. and Nicholas, S. (2006) *Crime in England and Wales 2005/06* Home Office Statistical Office <http://rds.homeoffice.gov.uk/rds/pdfs06/hosb1206.pdf>

⁸³ For a detailed discussion of the impact of domestic violence on children see Humphreys and Stanley (2015) *Op. Cit.*; Hester *et al* (2007) *op cit.*, Wolfe, D., Crooks, C., Lee, V., McIntyre-Smith, A., and Jaffe, P., (2003), ‘The effects of children’s exposure to domestic violence: a meta analysis and critique’, *Clinical Child and Family Psychology Review*, 6(3), Kitzmann, K., Gaylord, N., Holt, A. and Kenny, E., (2003), ‘Child Witnesses to Domestic Violence: A Meta-Analytic Review’, *Journal of Consulting and Clinical Psychology*, 71(2) and Evans, S., Davies, C. and DiLillo, D. (2008), ‘Exposure to Domestic Violence: A meta-analysis of child and adolescent outcomes’, *Aggression and Violent Behavior*, 13(2).

⁸⁴ Perry, B., Pollard, R., Blakley, T., Baker, W. and Vigilante, D. (1995) ‘Childhood Trauma, the Neurobiology of Adaptation, and “Use-Dependent” Development of the Brain: How “States” Become “Traits”’, *Infant Medical Journal*, 16:4, page 273.

Children can be adversely affected by domestic violence in one of two ways. They can be indirectly abused by the perpetrator by witnessing violence or they can be directly abused themselves by the perpetrator (physically, sexually, emotionally, financially or psychologically).

Indirect

Most children are aware of the violence and the abuse suffered by their mothers from a very early age.⁸⁵ Research supports this, showing that most children are aware of the violence and abuse suffered by their mothers - 87 percent of the 108 mothers in one study believed that their children had witnessed or overheard the abuse. This mirrors earlier findings which show that where there are children in the household, 90 percent are in the same or adjoining rooms when violence occurs.⁸⁶ Section 120 of The Adoption and Children Act 2002 extended the legal definition of 'significant harm' to a child to include the impairment suffered from seeing or hearing the ill treatment of another – particularly in the home, even if they themselves had not been physically abused or assaulted. The amendment which came into effect in January 2005 was created in response to research that children can sometimes suffer long-term damage from living in a home where domestic violence is taking place.

Direct Abuse

In families where domestic violence occurs, children may also be sexually or physically abused. A meta-analysis of research studies estimated that in 30-60 percent of domestic violence cases, the abusive partner was also abusing children in the family.⁸⁷ The rate of reported domestic violence is particularly affected by whether active questions are asked about abuse of children. A study of NSPCC cases found that where children were known to have been abused there was a dramatic increase in disclosure of abuse from an initial one-third to two-thirds of children, once a domestic violence monitoring form was introduced.⁸⁸ A 2002 NSPCC prevalence study showed that 26 percent of 18 to 24 years olds had lived with violence between their parents/carers and for 5 percent this was frequent and on-going.⁸⁹

Violence against women and girls is a particular child protection concern and reflected in referrals to children's social care and child protection cases.⁹⁰

Health impacts

Violence against women and girls has a significant impact upon the physical, sexual, emotional and mental health of women and children.

⁸⁵ See for example Taft, A, Watson, L, and Lee, C (2004) 'Violence Against Young Australian Women and Association with Reproductive Events: A Cross-Sectional Analysis of a National Population Sample', *Aust N Z J Public Health*, Vol. 28 and McWilliams and McKiernan (1993).

⁸⁶ Jaffe, P. , Wolfe, D. , &Wilson, S. (1990) *Children of Battered Women*, Newbury Park, California: Sage.

⁸⁷ Edleson, J (1999) 'Children Witnessing of Adult Domestic Violence', *Journal of Interpersonal Violence*, 14:4

⁸⁸ Hester, M. and Pearson, C. (1998) *From Periphery to Centre: Domestic Violence in Work with Abused Children*, Bristol: Policy Press.

⁸⁹ Cawson, P (2002) *Child Maltreatment in the Family: The Experience of a National Sample of Young People*, London: NSPCC.

⁹⁰ Children's Social Care estimates that around 70-80% of all contacts to the Integrated Pathways and Support Team (IPST)/ Multi-agency Safeguarding Hub (MASH) Team involve domestic abuse (Using the wider definition). In 2014/2015 there were 467 children involved in the cases referred to MARAC.

- Victims sustained an injury in almost half of all incidents of violence (48%) in the last Crime Survey in 2015⁹¹ suffered a physical injury as a result of the abuse.
- Forced sex leads to a range of sexual health problems, including increased risk for sexually transmitted diseases, gynaecological problems, chronic pelvic pain, painful menstruation, painful intercourse and infertility.
- Female genital mutilation has numerous health implications which include severe pain and shock, infection, urine retention, injury to adjacent tissues, immediate fatal haemorrhaging.
- The mortality rate for women involved in prostitution is 12 times higher than it is for the general population, the highest for any group of women.⁹²

Impact on housing and financial stability

Violence against women and girls has a significant impact on levels of homelessness and housing stability, with women often having to flee their homes and/or livelihood because of abuse:

- A 2002 study by Shelter found the domestic violence is the single most quoted reason for homelessness - 40% of all homeless women stated that domestic violence was the reason.⁹³
- An estimated 22% of women first entered prostitution when they were homeless or in temporary housing.⁹⁴ Toynbee Hall found that 4 out of 5 women involved in prostitution accessing services had some sort of unmet housing need. Local providers have identified lack of housing as a major problem and something that may increase prostitution.
- A 2014 report by the charity St Mungo's Broadway found that the majority of their homeless female clients had experienced gender-based violence and had been unable to access housing services to meet their needs.⁹⁵

Domestic violence also has a detrimental impact on employment. According to Walby and Allen, 21% of employed women who had suffered domestic violence in the previous 12 months took time off work due to the violence and 2% lost their jobs as a result.⁹⁶

⁹¹ ONS (2015) *Op. Cit.*

⁹² Peate, I. (2006) 'Paying the price: health care and prostitution' *British Journal of Nursing*, 15: p. 246-7 and Salfati, C. G., James, A.R. and Ferguson, L. (2008) 'Prostitute Homicide: A Descriptive Study, *Journal of Interpersonal Violence*, 23(4).

⁹³ Cramer, H. and Carter, M. (2002) *Homelessness: what's gender got to do with it?* London: Shelter.

⁹⁴ Cusick, L. & Martin, A. (2003) *Vulnerability and involvement in drug use and sex work*, Home Office Research Report 268, London: Home Office.

⁹⁵ Hutchinson, S., Page, A. and Sample, E. (2014) *Rebuilding Shattered Lives*, London: St. Mungo's Broadway


⁹⁶ Walby, S. and Allen, J. (2004) *Domestic violence, sexual assault and stalking: Findings from the British Crime Survey*, Home Office Research Study 276, London: Home Office.

SECTION 3 – Survivor and Community Consultation


This section explores how women from the community and survivors living in refuge provision in the borough view their own personal safety and wellbeing and examines how they feel safety can be increased as well as highlighting areas that they feel should be explicitly included within the VAWG Strategy. The questions were themed around the six strategic priorities.

Prevention and Early Intervention

A large number of respondents through the focus groups highlighted that it was really important to address attitudes to violence against women and girls and a number of respondents raised the issue of cultural and familial attitudes towards abuse and pointed to certain community beliefs that could contribute to the abuse of women. For example, black magic was highlighted as something that in-laws would use to prevent a woman from leaving a violent marriage but was little understood by mainstream workers. Respondents felt it was important to challenge culturally based attitudes towards abuse by working with the community.



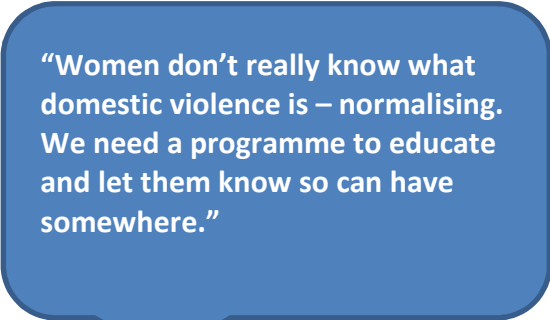
“It is important to tackle the issues from a culturally specific viewpoint, particularly where violence against women may be considered normal or expected in someone’s home country/ culture”



“There needs to be better education of boys and young men locally to tackle male dominant cultures and intimidation of girls and women”

Respondents suggested using different forms of communication to raise awareness in the community, including promoting the issue in local newspapers, on local radio and on community TV stations, using social networking sites like Facebook, doing roadshows in local markets and shopping centres, and publicity in places like Ideas stores. Respondents felt it was important to embed awareness raising within services that women access such as ESOL courses.

A significant proportion of respondents highlighted the importance of targeting **young people** to ensure that future generations are educated about violence against women and girls and what is or is not acceptable behaviour. Some respondents felt that schools should be the main environment for targeting young people, for example having violence against women on the agenda for school programmes and summer holiday schemes. One respondent felt that schools anti-bullying policies should include what is and is not acceptable behaviour towards women and young girls and that both parents and children should sign up to this.



“Women don’t really know what domestic violence is – normalising. We need a programme to educate and let them know so can have somewhere.”

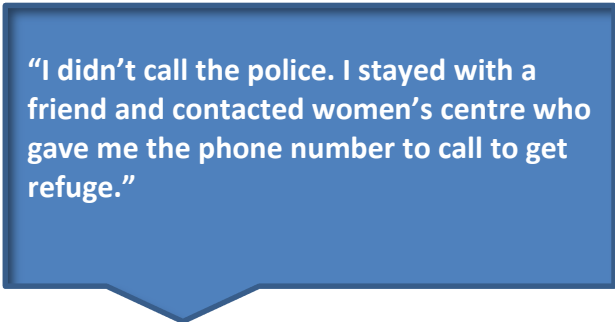
A number of respondents felt that it was important to target initiatives towards raising awareness amongst men and give men more of a role in speaking out about violence against women. Some suggested that more should be done to target boys who are likely to go on to commit violence against women, for example through school programmes. Respondents suggested identifying men to act as anti-violence against women advocates and to act as good role models for young men for example through community awards for good fathers/ husbands.

All of respondents felt that the champions programme, both within individual organisations/services but also the community that could raise awareness about services and key issues. Respondents also noted that it was important for this issue to have the support of community leaders and authority figures and that any campaign work should have their support.


Provision

Who do women report to?

Women consulted through the focus groups were unsure about who they might go to for support. Although the Crime Survey of England and Wales has consistently found that women are most likely to seek help from friends, relatives or neighbours, some of the women we spoke to felt it would be difficult to approach a family member. Reasons for this included fear that their family or the wider community would not understand or support them or a desire to protect family members from getting involved. Women said that they might confide in friends, groups of women or in their support worker.



“I didn’t call the police. I stayed with a friend and contacted women’s centre who gave me the phone number to call to get refuge.”



“I couldn’t go to family or friends because I would be judged by them. I only got support when I called the police and spoke to victim support.”

Women were more likely to want to report abuse where:

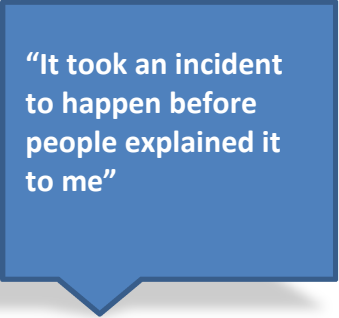
- They were assured that they were believed
- There was confidence and trust in the relationship with the service with which they sought help.
- There was 3rd party intervention – a health visitor or social worker who had identified the abuse and provided information to the victims (especially for those in refuge provision)

What were the barriers to reporting?

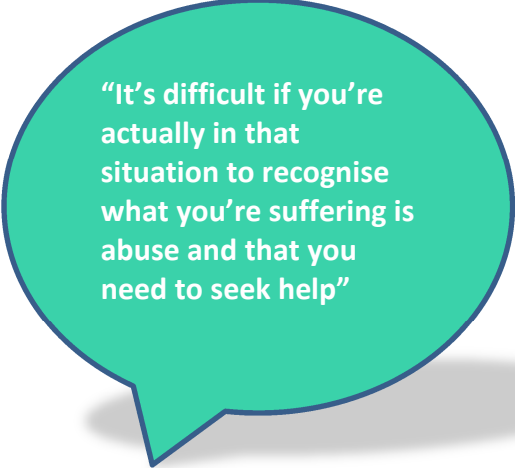
The barriers women identified to disclosing or seeking help for abuse were varied but are generally consistent with research into why women do not disclose abuse.

Lack of Awareness of what constitutes abuse

Lack of awareness and understanding of patterns of abuse was a significant issue. Some women believed that the violence would stop or that non-physical abuse was too trivial to report. Young people identified that whilst they were fairly aware of the issues it was not always so easy to recognise when you were in an abusive situation yourself.



“It took an incident to happen before people explained it to me”

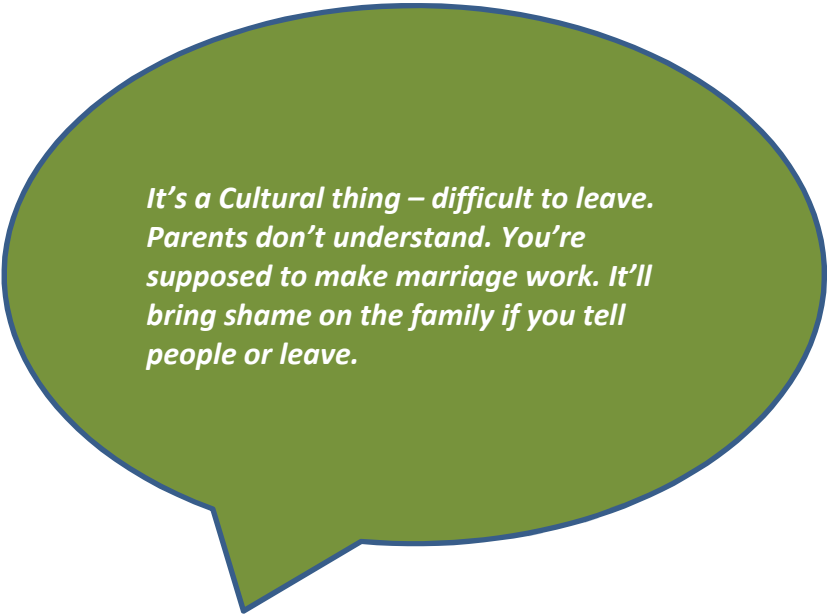


“It’s difficult if you’re actually in that situation to recognise what you’re suffering is abuse and that you need to seek help”

These responses mirror those of the findings of the Crime Survey for England and Wales which records a massive under-reporting of all forms of VAWG whereby those who do not disclose, a majority (consistently around 40%) do not report as they feel it is too trivial to report or that it is a private matter.

‘Cultural’ Barriers

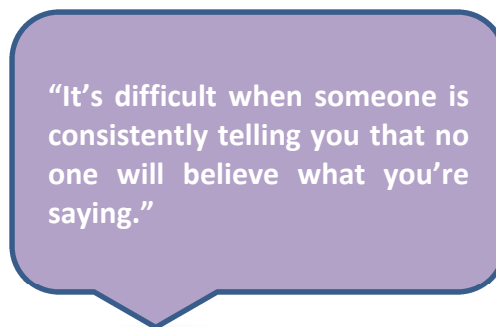
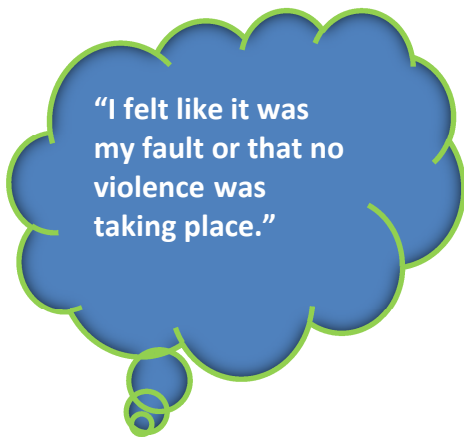
Many of the women who took part in the focus groups highlighted that perceived cultural barriers stop them from seeking help. There was a perception that marriage is for life and that they would bring shame on their families if they disclosed abuse.



It’s a Cultural thing – difficult to leave. Parents don’t understand. You’re supposed to make marriage work. It’ll bring shame on the family if you tell people or leave.

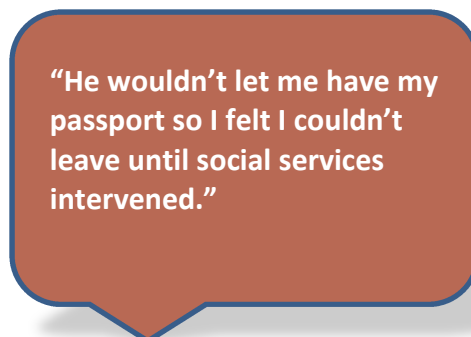
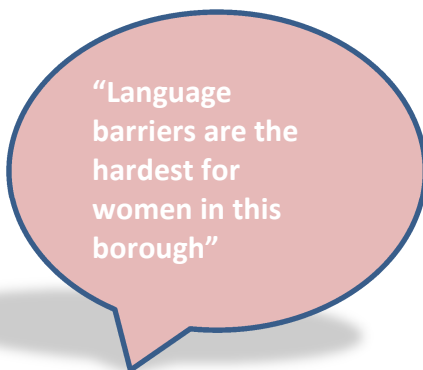
Lack of Self-Esteem or Self-confidence

A number of women identified that the impact of the abuse on their self-esteem prevented them from seeking help because they felt that they deserved to be abused:



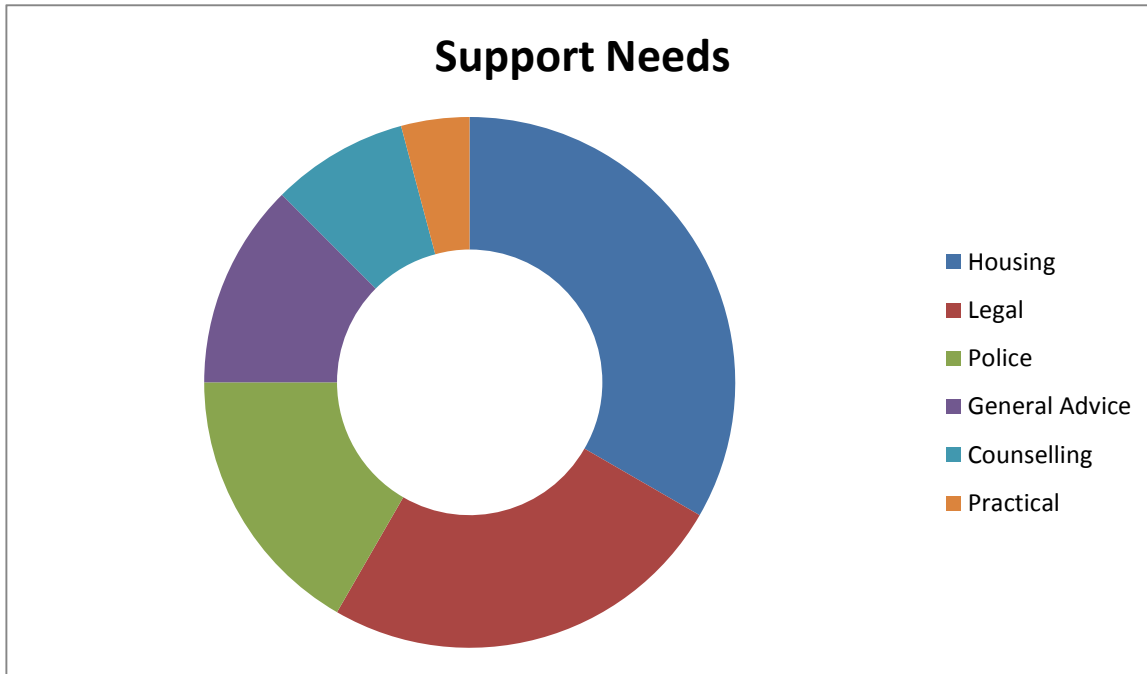
Practical issues

Women also identified practical reasons why they were unable to leave the relationship or seek help, such as not having access to sufficient finances (high levels of financial abuse were experienced by a number of the participants) to leave the relationship, not having access to immigration documents or not having the language skills to seek help:



What support do women need?

Women experiencing abuse often have a variety of support needs. On-going analysis of our DV1 forms of the sort of support women seek at the point of disclosing abuse has identified the most frequent forms of help seeking as:



Many respondents pointed to the difference between women’s immediate support needs– which were often about addressing practical issues – and longer-term support needs which were often focussed on helping women to rebuild their lives. Some respondents felt that these longer-term needs were sometimes not addressed or given sufficient priority by local services. The victims of abuse we spoke to as part of the consultation spoke about a range of things which had helped them to rebuild their lives, such as working or being part of a support group.

Participants outlined that peer support would be really helpful for them and for other women who may be at a different stage in their journey. They also felt that there should be wider campaigns around supporting women to understand that abuse is not their fault, including large scale campaigns in public spaces.

“There should be a big poster in the street, posters saying it’s not acceptable. All media focusses on her walking back alone and putting blame on women for sexual harassment. This needs to change”

“We need to change the question to ‘why are men behaving like that. The biggest stereotypes come from other women judging women rather than men. We need to change and help women understand it’s not their fault – have a campaign around blame!”

Protection

What makes women feel unsafe?

Their own personal situation also had an impact on women's feelings of safety. Women who had children reported greater feelings of intimidation where they felt that their children needed to be protected first and that they would be less able to protect themselves as a result if there was any violence or harassment.

Safety for victims of domestic violence was impacted by a variety of factors. In particular, women who had suffered violence in relationships said they were likely to feel more afraid if their partner knew where they lived and was able to contact them or if they felt isolated from support networks. They also highlighted fears around technology and the use of social media and applications that could enable their perpetrators to locate them. Women in the refuge had been given support by staff to change all of their settings and their social media accounts.

What did respondents think should be done to make women feel safer?

Many of the participants felt that there was still a lack of consistency in statutory services, particularly the police and social care, whereby their experiences were not seen as critical or that they felt they were being judged rather than protected.

"Women have experiences with the police where emergencies are not seen as emergencies. Women then say well I tried once and it didn't work so they don't bother or the perpetrators says something to them like it was just a fight"

"Some services don't have much awareness of domestic violence and what goes on. Training to raise awareness is crucial and then refreshers – new legislation. They need to understand the impact on the person"

The overarching area that women felt would provide the best support to protect them was a two-pronged approach – the crisis, high risk intervention followed up with more emotional and practical support. A number of the women we spoke to had returned to abusive relationships as the services stopped supporting them or deemed them to be lower risk.

"There needs to be a 2 pronged approach with practical and emotional support and independent trauma counselling. There's a critical moment when people want to talk, to get protection but then this needs to be followed up. Perpetrators convince services they've changed and he convinced me the first time round so I went back"

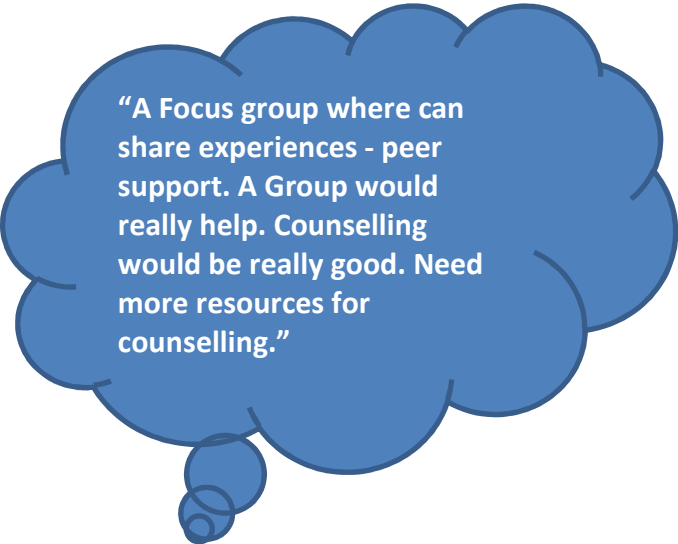
Victims also reported that having protective measures in place such as an injunction made them feel safer as they knew their partner was not allowed to contact them, although during the professional consultation some respondents highlighted that having injunctions sometimes gave women a false sense of security and safety.

A significant number of respondents felt that measures to build women's self-esteem and confidence would be effective in improving safety.

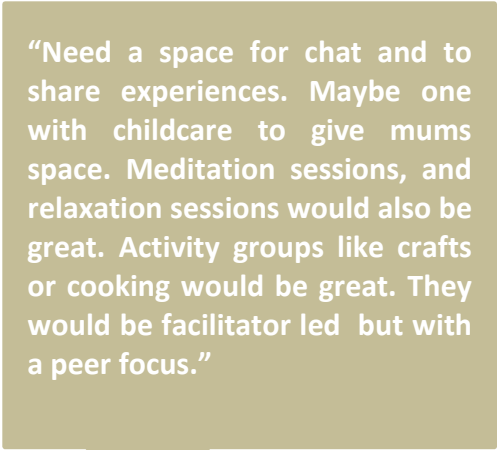
A significant number of respondents also commented that it was important to continue to have safe places for women who have fled domestic violence, including welcoming opportunities to be able to report at third party reporting centres.

Participation

The participants to all focus groups felt that participation was really vital. There was strong support for development of a survivors' group for women to be able to access peer support. They also felt that being asked what services would work best for them and for services to see them as 'experts by experience' as being really important. There was a strong willingness to develop support for other women who were currently going through abuse.



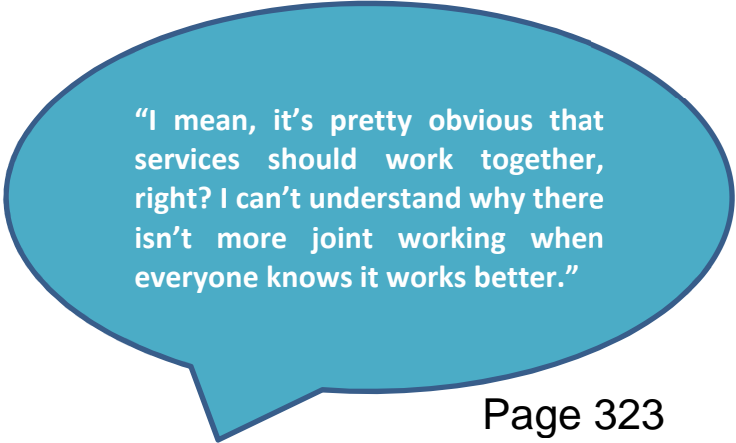
"A Focus group where can share experiences - peer support. A Group would really help. Counselling would be really good. Need more resources for counselling."



"Need a space for chat and to share experiences. Maybe one with childcare to give mums space. Meditation sessions, and relaxation sessions would also be great. Activity groups like crafts or cooking would be great. They would be facilitator led but with a peer focus."

Partnership

Participants felt that it was really important to have strong partnerships between organisations. There was a recognition that they need to work together – especially where they have some information about victims and there is a need to link the information up. Those interviewed who had been through the MARAC process felt that it had helped in their cases to have that support.



"I mean, it's pretty obvious that services should work together, right? I can't understand why there isn't more joint working when everyone knows it works better."

Perpetrator Accountability

Holding perpetrators of violence against women to account is challenging due to the nature of these offences and the level of underreporting of violence against women and girls. This means that most perpetrators of these crimes never, or only infrequently, come into contact with the police, let alone the courts and the probation service.

A number of respondents felt strongly that our approach to addressing these issues should put more responsibility on men rather than focussing on women and how they need to keep themselves safe. Respondents noted that women are often expected to move area, leaving behind their support networks and financial security. Some respondents felt that current responses were very female-targeted rather than tackling perpetrators. In dealing with risks to children it was noted that more emphasis should be put on the father and his role in keeping children safe. Respondents also felt that more work was needed with boys and men to show them that their behaviour is unacceptable.

Work with perpetrators – Respondents felt that direct work with perpetrators, for example through perpetrator programmes, was important. However, a number noted that the perpetrator course itself was not sufficient and in addition should be followed up with support/ guidance for a period afterwards, such as counselling, mentoring or support groups.

Respondents felt that perpetrators could be held more accountable by **raising awareness** of the consequences of violence against women and girls and emphasising that responsibility for violence rests with the perpetrator. Respondents suggested publicising cases of prosecution, or distributing posters in place men congregate letting men know the consequences of violence towards women.

“Men need help to change. We need to have more work about recognising relationships couple with counselling, art therapy – everyone should be able to get these. Resources!!”

“My husband always used excuses. Husband put all the blame on me. Need to understand what they are doing is wrong We need advertising on the TV. They need to be made aware. We need to arm newspapers, GPs and all services with information about where can get help for themselves to know what they are doing”

“The police should link perpetrators with services – both on arrest and as a compulsory part of probation but they have to want to change!”

“Need to have some awareness for men of all ages about what wrong and letting them know about consequences. There’s no information about dv in schools...Good programme – murdered by my boyfriend. Need to find something similar for men.”

Recommendations

- Prevention should be a key priority within the VAWG Strategy
- A multi-agency approach to delivering services for survivors is the best approach
- Multi-pronged, individual approach is needed to best support survivors
- Perpetrators should be given support to understand the consequences of their behaviour
- Hold a public awareness campaign to help women members in the community understand that experiencing abuse is not their fault
- Delivery of training to professionals on how to support survivors of VAWG with an empathetic approach
- Peer support methods, including group sessions, should be implemented
- The community champions programme should be expanded

Respondents felt that there needed to be sustainably funded support services available for women, particularly advocacy based services. Respondents also noted that it is important for women to have safe places to go, especially in times of crisis (such as refuges). Some respondents felt that there should be a single location or point of contact for women experiencing abuse to access all support and protection. A number of respondents also highlighted the need for services that could provide support during evenings and weekends.

Long-term support – Respondents highlighted the importance of providing long-term support for women and children not just whilst in relationship but afterwards to help them recover and rebuild their lives.

Developing women's capacity/ independence - Lots of respondents pointed to the need to provide opportunities to increase women's confidence and independence and empower them to rebuild their lives after abuse. Respondents suggested providing courses to increase women's independence, transition programmes and places where women can speak about their experiences and gain self-confidence.

Culturally specific services – Some respondents highlighted the need for culturally specific services and for services to be available in different languages.

Raising awareness amongst professionals – Respondents highlighted the importance of training staff across a wide range of services to ensure that they understood violence against women issues and were sensitive to those reporting abuse. Some suggested that training should be mandatory and that organisations should commit to releasing staff to attend training.

Providing information to women – Respondents highlighted the need to provide women with information at places they attend e.g. through mosques, children's centres, colleges, ESOL classes.

Work with survivors of domestic violence – Respondents felt that more work should be done with survivors of violence against women. They felt that giving a stronger voice to survivors of abuse would help to let other women know that abuse can be stopped and help is available

SECTION 4: Young People Consultation

Consultation with young people on VAWG has been ongoing since late 2014 as part of our 'Whole School' approach with a specific focus group held in February 2016 to establish key priorities for the VAWG Strategy. 18 young people aged between 14 and 21 participated in the focus group with a gender split of 10 young men and 8 young women.

Young people during the focus group were asked six questions about their understanding and interest in VAWG and were asked to rank the strategic priorities in order of their importance to them.

Which do you think is the most important area we should focus on for the VAWG Strategy?

Young people felt that protection from abuse was the most important area with over half ranking this area number one, followed by prevention of violence for future generations. They, surprisingly, felt that provision of appropriate support was the least important but on further questioning outlined that protection from abuse should lead to provision of appropriate support.

"You can't have protection from abuse without providing services to those who have been abused. All of the areas should be focused on, if I'm honest but I do think protecting people is most important."



Which strand is the most relevant to young people?

Rape and sexual violence emerged as the most important issue for young people, followed closely by Child Sexual Exploitation (CSE) although there was broad support for more awareness around each area. The participants also stressed the need to provide other young people with information around all of the strands as they are linked and should not be seen as completely separate areas.

"I think that they're all important. They all have an impact on someone's life. We need to raise awareness of each issue and provide information."

Why would a young person not disclose and/or seek help (barriers)?

All of the young people mentioned that stigma, embarrassment and shame were major barriers to disclosure for young people around VAWG. There was a consensus that as their parents would find out, they would find it increasingly difficult to disclose. Other barriers identified were: fear of statutory intervention or of getting families into trouble; fear of being in trouble themselves; fears around forced marriage or being sent 'back home' and a feeling that professionals did not know often how best to respond to young people.

What could help young people to disclose abuse (any of the strands)?

Overcoming these barriers would be a challenge but safe spaces for young people to disclose abuse was highlighted as a need as well as more education for professionals. Professionals' increase in education and awareness about the impacts of VAWG on young people was seen as the key lever for young people to support them to disclose. The participants also emphasised that many young people will speak to other young people about what's happening for them and that it's vital for peer support to be in place. They were all strongly in favour of the development of the youth champions programme.

What do you know about these issues?

Young people knew most about domestic violence although the participants also wanted other young people to have more awareness that it is not just physical abuse. They felt that this was an area that is often highlighted in the news, social media, television and so on but that other areas are even more dangerous and should be taken seriously. They spoke about where coercive control had been used in television to highlight other aspects of domestic abuse and that that had had more impact on them. Least was known about dowry related abuse and so-called 'honour' based violence although each of the participants had mentioned 'honour' or 'shame' in other contexts, which shows that there is a need for all of the VAWG areas to be addressed through work around prevention. Forced marriage was a known quantity to the young people although it was seen as an issue affecting certain 'cultures' rather than a cross-cutting area.

Which issues would you like to know more about?

FGM emerged from the consultation as the key area that young people would like to know more about, especially given the focus on this strand by the mainstream media over the past 12 months. Young people also felt that disclosing FGM would be a real struggle for young people as it involves speaking about intimate areas. Other participants felt that other young people needed to know more about prostitution as there are so many stereotypes involved and because of the portrayal on television it is seen as glamorous. Other less known areas including dowry related abuse and trafficking were also areas that the young people wanted to learn more about.

"We need to do more about prostitution. There are so many stereotypes – it's seen as a 'way to earn money' and this should be tackled."

"It's important to raise awareness about trafficking. We need more awareness about it. People underestimate that it could happen to them or a family member because they think that they are in a 'safe' environment."

"We need to know more about this [dowry related abuse]. Honour is a very important issue to tackle around this area. People, especially young people, don't know what it is so they won't know how to get help if it is happening."

One area that has been mentioned over and over by young people is the impact that pornography has on young people. They have highlighted that, at least for many young people in this borough, they don't have 'the talk' from their parents around sex and so seek elsewhere to understand.

"I think that the school needs to address these issues because society right now. I think all the kids, erm speak about women, speak about girls in certain manner that's influenced by music, that's influenced by films and sometime they don't know what right from wrong is. Now not knowing what right from wrong is means they aren't able to either speak to a girl in an appropriate manner or be respectful to a girl."

It's not even that...it's just no one wants to say it because it's a somewhat a taboo of a subject but with the rise of pornography and all of that boys are somewhat misinformed with reality and being misinformed with reality means they speak about women in a certain way and then it becomes natural to them. Using certain derogatory terms, if I may say so like bitch and so on (Res1: yeah) in such a casual way, it just becomes ingrained into their life and they just use it in a normal manner. Now of course that's not the correct way to address someone. And those terms and the way that free pornography and the way women are presented in pretty much all pornographic videos they affect the way the boys think. And they don't know they need to be educated. And someone needs to tell them that this is fake; this is not the real way of life.



Recommendations

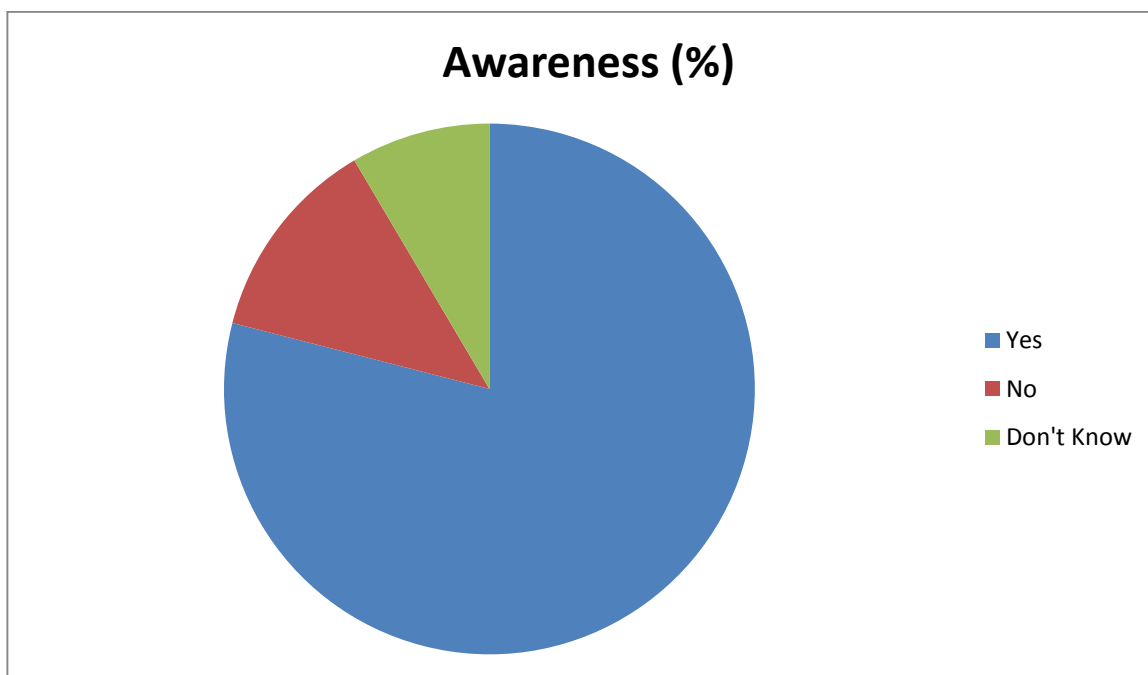
- Focus on providing young people with information about all of the strands of VAWG and where they can get help and support
- Develop the work in schools to ensure that all young people are getting the right messages about what is acceptable and what is not acceptable
- Development the youth champions programme, recognising that young people will often disclose to other young people
- Work with parents so that they understand the issues that young people face and can support their children
- Work with young people so that they can recognise that pornography and the media send out the wrong messages to young people about what healthy relationships look like.

SECTION 5: Professionals' Consultation

Consultation with professionals took place from October 2015 until February 2016. Over 200 professionals participated in the consultation, either by completing questionnaires; participating in interviews or through direct comments on the draft VAWG Strategy. The responses below pertain to the questions asked through the online and paper questionnaire. Those participating in interviews were asked to respond to these questions but were also asked a selection of the questions in Appendix 3.

Awareness of services

Generally, there was a high level of awareness of existing VAWG Services within the borough. Almost 4/5 (79%) of respondents knew about at least one specialist service.



Strategic Objectives

Respondents to the questionnaire and the stakeholders who were interviewed were told that in our current plan we have 4 key objectives and whether these are the right objectives to retain. The 4 objectives within the 2013-2016 Plan are: understanding of VAWG; Prevention; Identifying appropriate Support and Protection and holding Perpetrators to Account. There was overwhelming support for maintaining these objectives (93%) but also the need to include other areas – including partnership and participation of survivors.

"I think it's really important to develop a survivors' group and to build on existing peer support. Services also need to know about these groups and it would be helpful for the women we work with to be able to self-refer."

"Holding perpetrators to account should be reworded to provide support rather than just blame or punitive measures."

“The objectives provide holistic support approach to tackling VAWG. Each objective is interlinked and cannot be achieved. Perhaps “partnership” should be included as the others can’t be achieved without an effective partnership ethos.”

The key objectives have been redeveloped for the current VAWG Strategy as the ‘6P’ approach, recognising that there was a gap in the previous strategic objectives around partnership working and survivors’ participation. The new strategic objectives are:

- **Strategic Priority 1: Prevention and Early Intervention**
- **Strategic Priority 2: Provision of Appropriate Support to Survivors**
- **Strategic Priority 3: Protection from Abuse**
- **Strategic Priority 4: Partnership working across Statutory and Voluntary Agencies**
- **Strategic Priority 5: Participation of victim/survivors to inform services**
- **Strategic Priority 6: Perpetrator Accountability**



Respondents were then asked to rank the 6 strategic priorities in order of which they felt was most important. The majority of respondents felt that they should all be indivisible but provision of appropriate support and protection from abuse were highlighted as being of key importance. However, in the narrative section, the need to intersect all six was seen as crucial.

“Provision of services is required to achieve all of the above. Partnership working is key to achieving and continuing specialist services. Protection from all forms of abuse is what we are aiming on achieving, which includes prosecution for offenders and prevention of violence for future generations. Participation of victims/survivors is important to continue and improve the above.”

“All six areas need to be implemented at the same time. It is impossible to have a successful approach to tackling VAWG by focusing on one area or prioritising just one element or objective. We need a better joined up approach across all 6 areas.”



Strands of VAWG that should be included in the strategy

All the respondents felt that we should continue with the strands from our VAWG Plan 2013-2016 with the exception of dowry-related abuse, trafficking and prostitution which were still supported by over 90% of respondents. The areas identified that are missing is the need to include internet as a facilitator of different forms of abuse and the recognition that this has increased exponentially since our first VAWG Plan was published.

Key Barriers to reporting

Respondents to the questionnaire and participants interviewed were asked to identify key barriers from a range of suggestions based on research⁹⁷ and the barriers identified by survivors in Tower Hamlets. Respondents were also prompted to include their own based on their own experiences of supporting survivors. The key barriers identified to disclosure are:

Multiple disadvantages

⁹⁷ See for example: Baker, H. (2013) ‘The significance of shame in the lives of women who experience male violence’, *Liverpool Law Review*, (34) pp.145-171; Bell, E. and Butcher, K. (2015) *DFID Guidance Note: Part A Rationale and Approach – Addressing Violence against Women and Girls in Health Programming*, London: Department for International Development; Horvath, M., Hansen, S., Apena Rogers, S. and Adler, J. “Still not receiving the support they deserve...final evaluation The Stella Project Young Women’s Initiative, London: Middlesex University; Rose Foundation (2015) *How can we scale up effective approaches to tackling the violence and abuse that women from BME Communities face*, London: Open Space Event, funded by Comic Relief, Esmée Fairburn Foundation, Rose and Trust for London and Tillman, S., Bryant-Davis, T., Smith, K. and Marks, A. (2010) ‘Shattering Silence: Exploring Barriers to Disclosure for African American Sexual Assault Survivors’, *Trauma Violence Abuse*, 11(2), pp.59-70.

The need to increase support for women experiencing multiple disadvantage (homelessness, complex drugs and alcohol use, NRPF or poor mental health) was highlighted by a vast majority of respondents (86%). It was a key barrier identified to reporting and also the area in which respondents to the overall consultation felt that we needed to focus on more. *“It’s really crucial to increase support for these women who experience even more vulnerabilities than the rest of the population. They cannot access the support needed nor is there expertise in supporting women with multiple disadvantage.”*

Fear of institutions

68% of respondents felt that a fear of institutions including statutory services such as children’s social care and the police was a barrier to disclosure. Respondents outlined that for some residents in this borough there is a cultural mistrust of authority which is compounded by poor previous service received. All of the respondents citing this as a key barrier highlighted the need for greater training and awareness for staff working in these organisations.

“For some victims the greatest barrier to disclosure is those services they fear the most such as the police or children’s social care. Victims are petrified that their children will be taken away for failing to protect them or that the police will not respond appropriately. Poor previous responses from both have meant that within some communities there is almost a ‘Chinese whispers’ effect whereby there is community level mistrust and fear of these institutions.”

Fear of bringing shame

Again, 68% of respondents felt that a feeling of bringing ‘shame’ on the family was a huge barrier to disclosure for victims in Tower Hamlets. This is perhaps unsurprising given the demographics of the borough and the feeling that professionals are not always aware about VAWG strands such as the harmful practices strands where ‘honour’ and shame are built into the perpetuation of these forms of abuse.

“Fear of bringing shame on the family is the biggest barrier that I can see in terms of telling professionals about what is happening – particularly for younger women and LGBT men and women. People are afraid that if they tell someone either they won’t be believed, that they are lying to get accommodation, to get a place of their own away from their families or that they’ll get their families into trouble. We’ve seen it for years in this borough – the real ‘catch 22’ around disclosing abuse, especially when the wider families or communities are involved.”

Not aware they are being abused

High numbers of respondents (64%) felt that one of the barriers was that victims are unaware that they are being abused. This was also highlighted in the survivor consultation also, whereby women did not recognise that they were being abused until there was an outside intervention. Many of the respondents linked this barrier with the need for greater work on prevention in the borough and the need to educate young people from an early age around what healthy relationships look like to ensure that victims are aware and can be supported to seek help. This is particularly an issue where the abuse is not physical as even sexual abuse is normalised within relationships.

“I think people not being aware they are being abused is a very big issue as many people only associate abuse with physical violence and that if marked that is evidence. If no bruises/cuts etc.

the perception is that abuse is not that bad. There is still sadly a big perception that consent to sex in marriage doesn't matter as it is a 'male marital right'.

Fear of not being believed

Fear of not being believed was raised as a barrier by almost two-thirds of respondents (64%) who felt that women and girls are reluctant to disclose as they do not think that they will be believed. Work that we have done with school has shown that young women are extremely reluctant to disclose abuse as they feel that services will think that they are making it up, that they will be labelled as 'troublemakers'. The fear of not being believed is also built into the abusive mechanisms used by perpetrators who tell their victims that 'no one will believe you'. We have seen this in cases that have been referred to specialist support services over the past 3 years of the VAWG Plan where women have been told that their disclosure will mean that their children will be taken away as they are the ones to blame for what is happening to them. All of this is built into the need for greater training and awareness across all areas of the community within Tower Hamlets.

"I've often had women come into our service who say that they've been living with abuse for years and years, sometimes tens of years, as they don't think that anyone will believe them. Perpetrators are very clever in twisting victim's minds to think that they are the ones to blame especially where the perpetrators have 'good jobs' or a 'good reputation' in the community."

Don't believe services will make a difference to their safety

Just over half of respondents (55%) felt that victims did not disclose as they did not feel that services would make any difference to their safety and 36% said that non-disclosures were due to poor previous experiences of services. This is supported by research into barriers to disclosure, especially where victims have had a previous poor response to previous disclosures.⁹⁸

"Working on this area for around 10 years, I've found that so many women will say that they don't think that anything will make a difference to them. There's a real normalisation of abuse but also an almost fatalistic assumption that nothing will change if they do disclose."

'Cultural' barriers

Again, over half of respondents felt that victims in Tower Hamlets were unable or fearful of disclosing because of cultural barriers. Subsumed under this barrier was the lack of understanding of professionals around different cultures in the borough but also a similar barrier to the fear of institutions whereby 'culture' almost becomes a catch-all for members of different communities across the borough. Those questioned further on their responses to this explained that 'cultural' barriers also include areas that are barriers in themselves such as language barriers or women with no recourse to public funds not understanding what services are available.

"It's almost as though the abuse is 'normal' within that community – according to some of the women I've spoken to in the past year. Many women will say to me 'well in my culture, husbands can behave how they want, do what they want and the wives just have to accept it.' We find that

⁹⁸ See for example: Allnock, D. and Miller, S. (2013) *No one noticed, No one heard: A Study of Disclosures of Childhood Abuse*, London: NSPCC; Rose, D., Trevillion, K., Woodall, A., Morgan, C. and Feder, G. (2011) 'Barriers and Facilitators of Disclosures of Domestic Violence by Mental Health Service Users: Qualitative Study' *The British Journal of Psychiatry*, 198(3), pp.189-194

this has a big impact on women coming forward, especially around wider forms of abuse like sexual violence for example.”

Language barriers

Language barriers were identified by 55% of participants who felt that it was a real obstacle to disclosure, especially where women were prohibited from attending ESOL classes as part of the abuse that they experience.

“I mean, how can women disclose when they don’t know where to go, how to say it or what to say! Language is the biggest barrier faced by so many women.”

Fall between cracks in services

Half of the respondents highlighted that so many people fall between cracks in services. This is particularly relevant where their client group is young people or women experiencing multiple disadvantages. This means that younger people, especially if they are under 16, do not fit within the definition of domestic abuse or are unlikely to be prioritised by children’s social care. This transition period is particularly difficult in terms of disclosing and providing support.

“I’ve had real difficulty in working with some of the groups that are deemed hardest to reach but then who on the other hand aren’t seen as priorities by different agencies. It can be really frustrating and feeds into other elements like the ‘don’t believe services will make a difference’ one.”

Don’t know where to go

45% of respondents highlighted that it is difficult for people to disclose as they either don’t know where to go or there is a lack of suitable services (mentioned by 18%). During our work with young people in 2014 they outlined that young people wouldn’t even know where to start to look for services which was a driver for the development of the youth campaign and the youth leaflet.

“Really, for me I think that the key barrier for so many women (and men) is that they just don’t know where to go. Victims aren’t going to be able to read a big document like the service directory; they need to have information in places that they go. I really think that the champions programme and the increase in posters and things in toilets in the Idea Stores has helped people to know but there still needs to be more awareness raised.”

Lack of suitable services

The barrier around the lack of suitable services included where people felt that the services were not appropriate (i.e. need for specialist counselling for FGM, rather than counselling or services needing to be specifically for young people) or where they did not provide interpreters, childcare or culturally aware services to enable women and girls to disclose.

Lack of training for professionals

36% of respondents felt that the lack of training for professionals leads to huge barriers to disclosure – especially where professionals have no understanding of VAWG or the impact on women and girls. We have also found, both through the consultation but also through the work on the harmful practices pilot that there are professionals who feel that they can talk about areas

such as FGM as they are perceived as safe due to the number of survivors being relatively low but feel that they cannot broach the subject of forced marriage of 'honour' based violence because it is seen as 'racist' or interfering in people's culture.

"Training, training, training - I can't say it enough! People can't disclose abuse as the professionals don't have a clue what to do. I've seen such bad practice over the years of people looking horrified or scared by disclosures or they just shut the person up. Everyone should be training even if they're not a front facing person 'coz you never know!"

Disability

Having a disability (learning, mental or physical) has been identified in research as one of the key barriers to disclosure of abuse so it is perhaps surprising that it was mentioned by only 25% of respondents to this consultation.⁹⁹ However, support for disabled people and the lack of specialist support was highlighted in the next section on gaps to services as well as by the 27% who also said about inability to access services (as well as language barriers).

"It's even harder for women and girls with disabilities to disclose than it is for other women quite often. Our services struggle and I know that there have been difficulties for deaf women especially around FGM as there is a lack of sign interpreters."

Identifying Gaps

A key question asked of all participants in the consultation was about identifying gaps. Some of the gaps identified feed back into the need for better multi-agency working across sectors and age groups, especially for young people and older women showing a lack of awareness of existing services.

In mainstream services

One of the elements identified in the consultation as a gap is the lack of accessibility in mainstream services including for those who have additional needs. Respondents highlighted the need for all professionals within services, not just explicitly VAWG focused services, to be able to respond appropriately to victims of VAWG and refer to specialist support services. The other key areas stressed as gaps to mainstream services were: support for perpetrators; practical and emotional support for young people; greater levels of prevention work in schools; immigration advice for victims with NRPF and longer term support after resettlement.

"I think mainstream services could be made more accessible, through cross-cultural and cross-generational participation. The VAWG Champion programme really promotes this and could widen

"Everyone working and volunteering needs to have the expertise to identify it [VAWG], be confident to raise it and know how to signpost and support a victim."

⁹⁹ Miller, D. and Brown, J. (2014) *'We have the right to be safe': Protecting disabled children from abuse*, London: NSPCC; Dockerty, C., Varney, J. and Jay-Webster, R. (2015) *Disability and Domestic Abuse: Risk, Impacts and Response*, London: Public Health England; Murray, S. and Powell, A. (2008) 'Sexual assault and adults with a disability enabling recognition, disclosure and a just response', *Australian Centre for the Study of Sexual Assault*, No. 9.

In BME specific services

Again, the gaps identified in BME specific services tended to focus on language barriers rather than wider support. Interestingly, lack of joined up working was raised in this area and across all six gap areas. Overwhelmingly, respondents felt this is an area that Tower Hamlets should focus on addressing in the next VAWG Strategy and across all statutory and voluntary services.

In services for women with no recourse to public funds

As with gaps identified for women with complex needs, the biggest gap identified to all VAWG work was the need to provide better support for women with no recourse to public funds. Gaps were identified about information provision but also accommodation was the main gap.

“There is a real lack of accommodation for women with no recourse and this is compounding the violence they face and enables exploitation. There is also a need to clear and accessible information about what support they can and will receive”

In services for disabled victims (physical, mental and learning disabilities)

Again, respondents stressed the lack of joined up working between agencies and the need for better links between children’s and adult safeguarding especially during transition periods. Some of the elements stressed were the need for professionals to identify particular strands of VAWG, especially harmful practices for disabled victims. Others were concerned about the levels of specialist support for disabled victims.

“In terms of adult safeguarding I am not sure that historically DV has been recognised as something this group experiences. I also wonder about support services for older women as this seems to be a gap also”

In services for complex needs

Supporting women with complex needs was highlighted throughout the consultation as one of the main challenges for the VAWG strategy to address. Lack of joined up working across sectors and between statutory agencies was noted by the majority of respondents as a gap to providing support to this group. The need for additional services for women with complex needs was particularly outlined as well as smarter working by combining services across sectors.

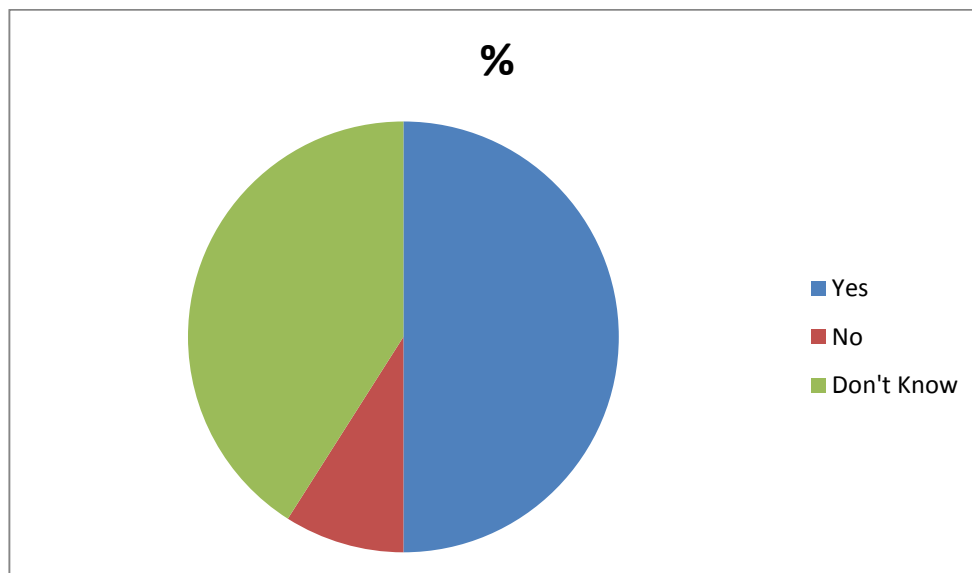
“It feels like there is a lack of multi-agency working or clear strategy around women with complex needs. I would like to see gender and trauma informed services for this group”

For those with language needs

There were few surprises in the responses to gaps with respect to those with language needs. All respondents highlighted the need for additional support for Bengali, Vietnamese, Somali and Chinese speaking residents. Other suggestions included training members of the community or not specialist staff who speak the languages to be trained to respond to victims. This is key in our approach of recruiting community and professional VAWG champions.

Efficiency of services

Although over 41% of respondents did not know whether the services could be delivered more effectively and efficiently, they also provided a narrative about how services could improve. The majority who said they did not know highlighted existing good practice – VAWG Champions programme, training and the wider specialist services.



Highlighted suggestions included:

- Better cross-sector working between VAWG and homelessness services
- Promotion of VAWG services within BME services
- Increasing the capacity of existing services to meet greater demand
- Better joined up and multi-agency working across the borough
- Joining gaps between the voluntary and statutory sectors
- Ensuring clear commitment and senior level buy-in from all Directorates within the council
- Victims being able to access specialist support services from within mainstream services

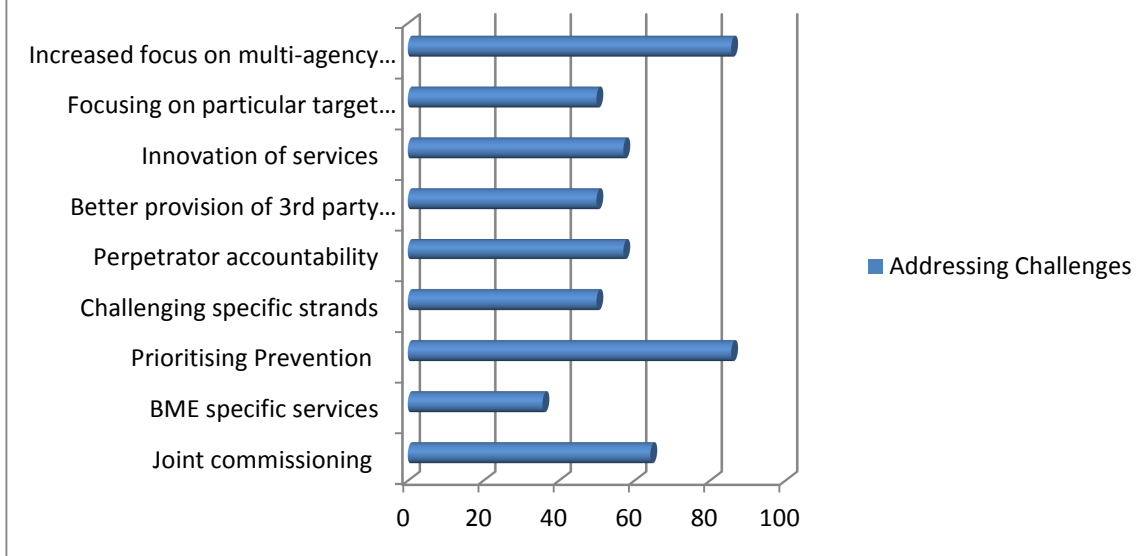
"I think the VAWG services are efficient and effective but with increased capacity could reach more organisations and individuals and expand their outreach work to respond to specific communities."

"If there was a clear commitment at senior level to address VAWG in a multi-agency way and to recognise gender then women's needs could be better met and this could save money for all services."

Addressing Challenges

Respondents were asked how we could address the key challenge of providing specialist, sustainable services in the current economic climate. The consultation highlighted the need to continue to provide services that adequately address survivors' needs as well as ensuring safety. The challenge is responding appropriately and efficiently in a climate of cuts.

Addressing Challenges



The top areas for respondents were an increased focus on partnership working and prevention work. These are two of the strategic objectives identified for the VAWG Strategy and are key to supporting vulnerable victims of VAWG in Tower Hamlets. Other areas that respondents felt could address the challenges faced were joint commissioning of services to increase efficiencies and value for money across services.

“The key for me is multi-agency working and skilling up all professionals to address VAWG. I feel like there could also be work done on spaces where people are likely to disclose - friends and family, medical context. While the focus on police and reporting is important this does not reflect how survivors access help.”

Recommendations

- Prevention should be a key priority in a climate of welfare reform and cuts. Continuation and expansion of work with young people, starting from reception is vital
- Links between competing priorities and VAWG should be made more explicitly – for example countries where FGM is emerging due to the increase in radicalisation and the increase in threat of extremism as a factor in child arrangement orders in the family courts
- Maintain the four objectives from the previous VAWG Plan but expand to highlight the need for better partnership working and participation by survivors
- Develop work across sectors, including having a renewed focus on women experiencing multiple disadvantage and work with older and disabled women
- Develop a survivors' forum which will be a peer support group for survivors of all forms of VAWG
- Commission services for young people experiencing VAWG as they often fall through gaps between children's and adult services and existing services are predominantly funded externally
- Develop links with some of the large employers in the borough to highlight the impact of VAWG on their staff
- The key barriers to disclosure are faced by women experiencing multiple disadvantage and a fear of institutions. These need to be a key focus of the VAWG Strategy
- There is broad based support for the existing strands but there needs to be a focus on the internet as a facilitator of abuse

Appendix 1: Consultation Log

We started our consultation process in October 2015 and continued until February 2016 to ensure that we could consult with as many people as possible. The consultation methodology is varied to allow for different stakeholders to contribute to our Strategy. A consultation questionnaire was launched in October and individual meetings and focus groups started in November 2015. (A paper version of the questionnaire is also available). As outlined above, a report on the consultation will be published in due course.

Table 3: Consultation Timeline

Action	Date
Launch of VAWG Consultation Questionnaire	October 2015
16 Days of Action	November 2015
Interviews with key stakeholders	November 2015 – February 2016
SMT	December 2015
DMT	February 2016
VAWG Steering Group	January 2016
DV Forum	January 2016
Community Safety Partnership	January 2016 (final presentation April 2016)

A Stakeholder analysis was conducted to ensure that the correct agencies have been consulted. Consultation with a range of key professionals from the agencies listed in Table 4 will continue until end January.

Table 4: Key Stakeholders

Stakeholder	VAWG Strand
'A' Team Arts	All
Barts Health NHS Trust (community and acute services)	All
Citizens Advice	All
City Gateway	All
Community Mental Health Teams	All
Community Safety Partnership members	All
Domestic Violence and Hate Crime Team	All
Domestic Violence Forum	All
East London Foundation Trust	All
East London Harmful Practices Steering Group	Harmful practices
East London Rape Crisis	All, especially sexual violence and 'harmful practices'
Faith Regan Foundation	All
Head Teachers	All
Hestia	All
Hostel Providers	All
LBTH Adults' Safeguarding Board	All
LBTH Adults' Social Care	All
LBTH Attendance and Welfare Service	All

LBTH Children's Centres	All
LBTH Children's Safeguarding Board	All
LBTH Children's Social Care	All
LBTH Domestic Violence Team Services –The MARAC Steering Group, the LBTH 'One Stop Shop', the Homeless Person's Unit (HPU) drop-in service and the Barkantine Medical Centre	All
LBTH Housing Department – Housing Options and Support Team (HOST) and Homeless Families Service	All
LBTH IARP (Identify, Assess, Referral Programme)	All, especially prostitution and sexual violence
LBTH Idea Stores	All
LBTH MASE Group	CSE
LBTH Parent and Family Support Service	All
LBTH Public Health	All
LBTH Supporting People	All
LBTH THEOs	All
LBTH Youth Offending Service	All
LBTH Youth Services	All
London Black Women's Project (formerly Newham Asian Women's Project)	All
London Fire Brigade	All
Look Ahead	All
Mayor's Office for Policing and Crime (MOPAC)	All
Metropolitan Police	All
NIA Project	All
North East London FGM Group	FGM
NSPCC Protect and Respect	Child Sexual Exploitation and Sexual Violence
Ocean Somali Community Association	All, especially FGM
Open Doors	All, especially Prostitution and Sexual Violence
Partnership for Ending Harmful Practices (PEHP)	All, especially harmful practices
PRAXIS	All
Probation (Community Rehabilitation Company and National Probation Service)	All
Registered Social Landlords	All
Step Forward	All
The Haven	Sexual Violence
The Specialist Domestic Violence Court (SDVC)	All
Tower Hamlets Volunteer Centre	All
TV Edwards	All
VAWG Champions	All
VAWG E-Group Members	All
VAWG Steering Group members	All
Victim Support	All
Women's Health and Family Services	All, especially FGM

APPENDIX 2: ONLINE AND PAPER CONSULTATION

Between October 2015 and February 2015 an online consultation (with a paper version) was held to elicit responses from professionals and from women living in the borough. There were a total of 60 responses received. For simplicity, only 10 key questions were included in the questionnaires and additional responses could also be included.

VAWG Plan Consultation



1. Are you currently aware of VAWG Services in Tower Hamlets?

Yes No Don't Know

Please list all services you know

2. Our current Plan has 4 key objectives (Understanding of VAWG, Prevention, Identifying appropriate support and protection and Holding perpetrators to account). Do you think we should maintain these for the new plan?

Yes No Don't Know

Please elaborate

3. We currently have 6 key areas that we work towards - Prevention, Provision, Protection, Partnership, Participation and Prosecution. Please rank these in the order of importance for you with 1 being most important and 6 being least important.

Key Area	Ranking
Prevention of Violence for Future Generations	
Provision of appropriate support to survivors	
Protection from abuse	
Partnership working across statutory and voluntary agencies	
Participation of victims/survivors to inform services	
Prosecution for offenders	

4. Please explain your choice

5. Which strand of VAWG do you think we should include? Please tick all that apply

- Domestic Violence and Abuse
- Sexual Violence (including rape, sexual assault, sexual harassment, sexual bullying, 'revenge porn')
- Female Genital Mutilation
- Forced Marriage
- Dowry Related abuse
- So-called 'honour' based violence
- Trafficking (for sexual exploitation and domestic servitude)
- Prostitution
- Child Sexual Exploitation
- Stalking and Harassment
- Other

6. What gaps are there in VAWG Services in Tower Hamlets?

In mainstream services	
In BME specific services	
In Services for women with no recourse to public funds?	
In services for disabled victims (physical, mental and learning disabilities)?	
In services for complex needs (drugs, alcohol, homelessness etc.)?	
For those with language needs?	

7. Could our VAWG services be delivered more effectively and efficiently?

Yes No Don't Know

Please elaborate on key outcomes you would like to see?

8. How can we best address the key challenge of providing specialist, sustainable services in the current economic climate?

- Joint commissioning of services
- Commissioning BME specific services
- Prioritising prevention work with young people
- Challenging specific strands such as 'harmful practices' (forced marriage, so-called 'honour' based violence and FGM)
- Ensuring perpetrators are dealt with including measures such as eviction for domestic violence related charges
- Ensuring better provision of third party reporting sites
- Innovation of services

- Focussing on particular target groups e.g. complex needs or disabilities
- Increased focus on multi-agency working to reduce resource costs and improve responses
- Other suggestions or comments

9. What are the key barriers for victims in Tower Hamlets to report and how could we overcome them?

- Fear of institutions (Police, Social Services etc.)
- Fear of not being believed
- Language Barriers
- Fear of bringing 'shame' on families
- Disability
- Multiple Disadvantages (drugs/alcohol needs, homelessness etc.)
- Don't know where to go
- Don't believe services will make a difference to their safety
- Unable to access services (physically not allowed)
- Fall between cracks in services (e.g. age limits etc.)
- Lack of training for professionals – don't know how to respond
- Lack of suitable services (e.g. BME specific services)
- Poor previous service or engagement
- Not aware they are being abused
- Cultural barriers

Other or please elaborate on your choices above

10. Address

Name	
Company	
Address	
Post Code	
Email	
Telephone	

Thank you! Please return to vawg@towerhamlets.gov.uk or fax to: 0207 364 0299

APPENDIX 3: Additional Questions asked during Individual or Group Interviews

- Are you aware of the services available to support victims of VAWG in Tower Hamlets?
- How can we best engage men in work to end VAWG?
- What practical issues do survivors face?
- What other areas do you think we should focus on?
- Do you agree we should continue to address the same strands?
- Are there other areas of work we should include?
- What gaps are there in VAWG services in Tower Hamlets?
- In an ideal world what services would you like to see?
- Can our VAWG services be delivered more effectively and efficiently?
- What are the key outcomes you feel should be included?
- Who needs to be involved in a multi-agency approach?
- What is your understanding of VAWG?
- What training do you think you and your organisation need to understand and address VAWG?
- Are services to help victims of VAWG easy to access?
- If you needed to get information or support for yourself or someone you know would you know where to go?
- What are the key challenges in providing a sustainable service?
- Do you think we should maintain our current objectives?
- If not, what should we prioritise?
- What are the ways in which women and girls currently access support and protection?
- What are the types of support women and girls find most helpful?
- How do you think we can best explore ways to prevent violence?
- How can organisations work together to provide an effective response to women and girls and to hold perpetrators to account?
- How can we best identify gaps and needs as well as any barriers to accessing support services?
- Are you aware of the current priorities within our VAWG Plan?
- If yes, do you think these are the right ones?
- If no, explain and highlight which you feel are most relevant?
- What do you think is the most pressing issue for the VAWG strategy to cover?
- Which do you think is the most important area?

- What better support could be provided to victim/survivors who are: NRPF, BME, disabled etc.
- What is the most important thing we can do to tackle VAWG?
- What are the key barriers for victims to access support?
- Who do victims currently report to?
- What can be done to improve support?
- How can we challenge 'cultural' issues?
- What can be done to tackle young people's attitudes to VAWG?
- What more can we do to tackle 'harmful practices'?
- What is the key barrier for trafficked people to access support?
- How can we identify VAWG?
- What more can we do to safeguard future generations?

For further information:

Fiona Dwyer (VAWG Strategy Manager)

Fiona.dwyer@towerhamlets.gov.uk

0207 364 4380

EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

Name of 'proposal' and how has it been implemented (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)	VAWG Strategy (2016-2019)
Directorate / Service	CLC/ Community Safety
Lead Officer	Shazia Ghani
Signed Off By (inc date)	Andy Bamber
Summary – to be completed at the end of completing the QA (using Appendix A) (Please provide a summary of the findings of the Quality Assurance checklist. What has happened as a result of the QA? For example, based on the QA a Full EA will be undertaken or, based on the QA a Full EA will not be undertaken as due regard to the nine protected groups is embedded in the proposal and the proposal has low relevance to equalities)	<div style="display: flex; align-items: center;"> <div style="width: 20px; height: 20px; background-color: green; margin-right: 10px;"></div> <div> <p>Proceed with implementation</p> <p>A full equality impact assessment accompanies this checklist. Robust consultation was held with respondents who meet all 9 protected characteristics to ensure that our work does not negatively impact on anyone. International, national and regional research was used in the development of the strategy and complements the work of the Equality Analysis.</p> </div> </div>

Page 351

Stage	Checklist Area / Question	Yes / No / Unsure	Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)
1	Overview of Proposal		
a	Are the outcomes of the proposals clear?	Yes	This report requests MAB to comment on the draft Violence against Women and Girls Strategy 2016-19.

			<p>This strategy outlines and highlights the commitment of the partnership to strengthen a coordinated multi-agency approach to tackling VAWG over the next three years and build upon the previous VAWG Plan. Through a successful delivery of the VAWG programme, the strategy aims that all women and girls are free from all forms of gender-based violence and from any threat of such violence.</p> <p>The strategy also aware that abuse can take place regardless of gender, ethnicity, faith, sexuality or age. The service also recognises men can be victims of interpersonal violence, although the current data show that 97% of the victims are women in the Borough. As a local area, the service remains committed to providing support for all victims of abuse. The intention of this plan is to strengthen our response to responding to abuse rather than undermining this approach.</p>
b	Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)? Is there information about the equality profile of those affected?	Yes	The accompanying EA shows that all nine protected characteristics will have positive impact from the proposal.
2	Monitoring / Collecting Evidence / Data and Consultation		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	<p>Evidence to support the VAWG Strategy has been collected over the past three years of the previous VAWG Plan. As the accompanying EA shows, the service have a range of evidence to look at the impact on service users and staff including:</p> <ul style="list-style-type: none"> • VAWG training evaluation forms • DV1 forms • MARAC recording data • SDVC evaluation data • Police data • Service data • National and local prevalence data <p>This strategy has drawn upon a wide range of data sources</p>

			<p>to establish prevalence which includes a comprehensive consultation process with partners, survivors and organisations across the borough.</p> <p>Despite this, it is widely acknowledged that all strands of VAWG are underreported and many survivors do not come to the attention of services. This coupled with lack of awareness of professionals around individual strands, means that true prevalence data is not obtainable. However, a major part of the work of the VAWG agenda has been to boost reporting across each priority area and there has been an increase across the majority of strands since 2013.</p>
	Is there sufficient evidence of local/regional/national research that can inform the analysis?	Yes	See above.
b	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Yes	See above.
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	A series of consultations were held and informed the strategy. See Appendix 'VAWG Consultation Report 2016'.
3	Assessing Impact and Analysis		
a	Are there clear links between the sources of evidence (information, data etc) and the interpretation of impact amongst the nine protected characteristics?	Yes	See the Section 3 of the accompanying EA.
b	Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups?	Yes	The Strategy states that the service remains committed to providing support for all victims of abuse regardless of their backgrounds.
4	Mitigation and Improvement Action Plan		
a	Is there an agreed action plan?	Yes	Individual strands or combined areas identified in the Strategy have action plans which are monitored on a regular basis. Each action plan and the performance matrix are reviewed and evaluated on an annual basis.
b	Have alternative options been explored	Yes	Do nothing option was considered.

5	Quality Assurance and Monitoring		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	Each action plan and the performance matrix are reviewed quarterly and evaluated on an annual basis.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics??	Yes	See above.
6	Reporting Outcomes and Action Plan		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	Yes	

Equality Analysis (EA)

Financial Year
2013/14

Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose
(Please note – for the purpose of this doc, 'proposal' refers to a policy, function, strategy or project)

Violence Against Women and Girls (VAWG) Strategy

**See Appendix
A**

Current decision
rating



Conclusion - To be completed at the end of the Equality Analysis process

(the exec summary will provide an update on the findings of the EA and what outcome there has been as a result. For example, based on the findings of the EA, the proposal was rejected as the impact on a particular group was unreasonable and did not give due regard. Or, based on the EA, the proposal was amended and alternative steps taken)

Name:

(signed off by)

Date signed off:

(approved)

Service area: Safer Communities

Team name: Domestic Violence and Hate Crime

Service manager: Shazia Ghani

Name and role of the officer completing the EA: Fiona Dwyer (VAWG Strategy Manager)

Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

Evidence to support the VAWG Strategy has been collected over the past three years of the previous VAWG Plan. We have increased our equalities monitoring data over that time period and have a range of evidence to look at the impact on service users and staff including:

- VAWG training evaluation forms
- DV1 forms
- MARAC recording data
- SDVC evaluation data

This strategy has drawn upon a wide range of data sources to establish prevalence which includes a comprehensive consultation process with partners, survivors and organisations across the borough. Despite this, it is widely acknowledged that all strands of VAWG are underreported and many survivors do not come to the attention of services. This coupled with lack of awareness of professionals around

individual strands, means that true prevalence data is not obtainable. However, a major part of the work of the VAWG agenda has been to boost reporting across each priority area and there has been an increase across the majority of strands since 2013.

Section 3 – Assessing the Impacts on the 9 Groups

Please refer to the guidance notes below and evidence how your proposal impacts upon the nine Protected Characteristics in the table on page 3?

For the nine protected characteristics detailed in the table below please consider:-

- **What is the equality profile of service users or beneficiaries that will or are likely to be affected?**

Use the Council's approved diversity monitoring categories and provide data by target group of users or beneficiaries to determine whether the service user profile reflects the local population or relevant target group or if there is over or under representation of these groups.

This proposal seeks to address the inequality of women who experience abuse disproportionately to men. Approximately 97% of all known victims of interpersonal violence in Tower Hamlets are female - a significant gender bias towards women. As a team we do provide support to men experiencing domestic abuse and all forms of violence and whilst the VAWG Strategy does not make direct reference to male victims, we as a service remain committed to supporting male survivors of violence. Abuse can take place, however, regardless of gender, ethnicity, faith, sexuality or age. Whilst we recognise that the issues in the previous plan and this strategy have a disproportionate effect on women, we also recognise that boys and men are victims of violence too - 3% of all victims of interpersonal violence in Tower Hamlets. As a local area, we remain committed to providing support for all victims of abuse and the intention of this plan is to strengthen our response to responding to abuse rather than undermining this approach.

- **What qualitative or quantitative data do we have?**

List all examples of quantitative and qualitative data available (*include information where appropriate from other directorates, Census 2001 etc.*)

- *Data trends – how does current practice ensure equality*

We have collated a wide range of data during the previous 3 years of the original VAWG Plan. This has allowed us to build up a slight picture of VAWG in Tower Hamlets. However, as outlined above there are many areas where there is underreporting, meaning that the data we have does not show a full picture. The data that we have used for the development of the strategy has been:

- A Stakeholder consultation held between October 2015 and January 2016, with additional consultation with young people occurring between 2014 and 2015.
- Monitoring of MARAC data
- DV1 referrals
- Referrals to the One Stop Shop
- Referrals to the Sanctuary Scheme
- Monitoring of outcomes at the Specialist Domestic Violence Court
- Monitoring of IRIS data
- Monitoring of funded specialist support programmes: IDVA service, Violent Crime Caseworkers, Floating Support, Refuge and Harmful Practice pilot.

- **Equalities profile of staff?**

Indicate profile by target groups and assess relevance to policy aims and objectives e.g. Workforce to Reflect the Community. Identify staff responsible for delivering the service including where they are not directly employed by the council.

N/A

- **Barriers?**

What are the potential or known barriers to participation for the different equality target groups? E.g.- communication, access, locality etc.

The key barriers are underreporting of VAWG across all strands, particularly across the harmful practices areas (so-called 'honour' based violence, forced marriage and female genital mutilation). We have worked to mitigate this by working with MOPAC and partners from across the voluntary and statutory sector to increase reporting through a combined approach of prevention, provision and perpetrator accountability.

The demographics of Tower Hamlets means that there are relatively high levels of vulnerability within the borough's population including high numbers experiencing mental health and substance misuse issues as well as those with language support needs and disabilities (physical and learning). Women with additional vulnerabilities find it most difficult to seek help and are therefore often most at risk from abuse. We have found that coupled with No Recourse to Public Funds, women are often living for many years with abuse across the spectrum of gender-based violence.

We also work closely with specialist organisations to increase reporting from other groups who are less likely to report including women with no recourse to public funds and those experiencing multiple disadvantages (homelessness, complex drugs and alcohol use, street based sex working and mental health needs).

We have ensured that all specialist services funded by the council have speakers of key languages in the borough and an awareness of the different ethnic groups across Tower Hamlets.

- **Recent consultation exercises carried out?**

Detail consultation with relevant interest groups, other public bodies, voluntary organisations, community groups, trade unions, focus groups and other groups, surveys and questionnaires undertaken etc. Focus in particular on the findings of views expressed by the equality target groups. Such consultation exercises should be appropriate and proportionate and may range from assembling focus groups to a one to one meeting.

We have taken a combined approach to consultation. The consultation methodology is varied to allow for different stakeholders to contribute to our Strategy. A consultation questionnaire was launched in October and individual meetings and focus groups started in November 2015. (A paper version of the questionnaire is also available). We have also held a range of focus groups with professionals, local residents and survivors to inform our strategy and assessment.

- **Additional factors which may influence disproportionate or adverse impact?**

Management Arrangements - How is the Service managed, are there any management arrangements which may have a disproportionate impact on the equality target groups.

N/A

- **The Process of Service Delivery?**

In particular look at the arrangements for the service being provided including opening times, custom and practice, awareness of the service to local people, communication

We are not providing a new service but building on our VAWG work and the VAWG Plan 2013-2016. We have developed action plans across all 10 strands working with organisations, statutory and voluntary, across the borough to inform our response to tackling VAWG.

Please also consider how the proposal will impact upon the 3 One Tower Hamlets objectives:-

- **Reduce inequalities**

The VAWG Strategy specifically seeks to address inequalities that contribute to women and girls experiencing all forms of violence and exploitation. We are also working within that to recognise areas where women experience further inequalities including disability, age, maternity and so on.

- **Ensure strong community cohesion**

This plan seeks to increase awareness of gender inequality and includes a commitment to working with perpetrators of violence and increasing awareness of the impact of VAWG issues on individuals, families and the community as a whole.

- **Strengthen community leadership.**

We work in partnership with community and voluntary sector organisations and this includes faith, disability, LGBT and other community based organisations who are central to raising awareness of VAWG.

Target Groups	Impact – Positive or Adverse	Reason(s)
Race	Positive	<p>We are committed to supporting all victims of VAWG, regardless of their ethnic background. We know that the ethnic profile of the borough suggests that ‘culturally’ specific forms of violence such as forced marriage, ‘honour’ based violence and female genital mutilation are key issues for the borough, although these forms of violence, despite a vast increase in reporting through our coordinated approach, are not always well reported to local agencies. We hope to address this through a two year project which is currently in its first year which is funded by MOPAC and the DfE.</p>
Disability	Positive	<p>Research has consistently found that disabled women are twice as likely to experience domestic violence as non-disabled women are. The same research has shown that disabled men are also more at risk, although at a rate of about 1.5 times non-disabled men. In 2014/2015 there were 23 disabled victims (20 female and 3 male victims) referred to the domestic violence MARAC. The VAWG strategy provides key consideration to the additional barriers that disabled victims face in reporting and we have highlighted the impact on disabled victims of forced marriage in particular.</p>
Sex	Positive	<p>Although the strategy is predominantly aimed at supporting women and girls who have been affected by abuse, we recognise that men and boys also need support and we provide services to ensure that all victims are supported. Young men are included within all training and awareness-raising in schools and we work to ensure a rights based approach to supporting all victims affected. In 2014/2015, 382 females and 31 males were discussed at MARAC, meaning that men comprised almost 7.5% of all cases discussed.</p>
Gender Reassignment	Positive	<p>The VAWG Strategy (and separate domestic violence action plan) gives consideration to the needs of transgender people, how they choose to define their gender and choose the services that are appropriate to their needs. We are committed to providing specialist training in this area to organisations within the borough. We are currently aware that there may, as with other areas of VAWG, be an underreporting from the transgender community but we do keep figures from the MARAC on transgender people and are aware that 1 case was subject to MARAC during 2014/2015.</p>
Sexual Orientation	Positive	<p>The Strategy gives consideration to sexual orientation and we support all survivors of abuse regardless of sexual orientation. Research suggests that there are similar levels of VAWG in LGBT relationships as in heterosexual relationships: here it is clear both men and women can be victims and perpetrators. In 2014/2015, there were 9 gay men, 2 bisexual women and 1 transgender man referred to the Domestic Violence MARAC.</p>
Religion or Belief	Positive	<p>The VAWG strategy recognises the key role of faith leaders in challenging attitudes about the prevalence and acceptability of VAWG and sets out how we will work with people from all faith backgrounds to involve them in the development of the</p>

		communications and awareness raising elements of the strategy with a focus on prevention and early intervention.
Age	Positive	<p>The VAWG strategy seeks to address inequalities faced by women and girls of all ages. We are particularly aware that older women (aged 60+) may face increased vulnerability due to their age and we actively work with the Safeguarding Adults Team to promote increased awareness of VAWG as well as providing training delivered by specialist services working with older victims of VAWG.</p> <p>Each year up to 750,000 children in the UK experience domestic violence. Most children who live in families where there is abuse are aware of the abuse that has been taking place and a meta-analysis of research studies estimated that in 30 -60 percent of domestic violence cases, the abusive partner was also abusing children in the family meaning that it is the most serious safeguarding issue for children. Children's social care estimates that around 70-80% of all contacts to the Integrated Pathways and Support Team (IPST)/Multi-agency Safeguarding Hub (MASH) Team involve domestic abuse (using the wider definition). In 2014/2015 there were 467 children involved in the case referred to MARAC.</p> <p>The majority of forms of VAWG adversely impact on young people up to the age of 24, including forced marriage and other forms of harmful practices. The VAWG Strategy explicitly recognises the impact that the high youth population in the borough has on our response to VAWG and we work closely with children's social care to address specific areas that affect young people including child sexual exploitation and sexual violence within a gang or group situation.</p>
Marriage and Civil Partnerships.	Positive	The VAWG strategy aims to support all residents regardless of their marriage status.
Pregnancy and Maternity	Positive	The risks of experiencing violence increase during pregnancy and we work closely with maternity services to establish clear working protocols and actions to address this. This includes a holistic maternity clinic for women survivors of FGM who are pregnant.
Other Socio-economic Carers	Positive	<p>In Tower Hamlets, over the past year alone, we have had 10 cases to the domestic violence MARAC where single women with no recourse to public funds have been referred. Women who are also victims of forced marriage or trafficking for the purposes of forced marriage have been forced to flee from abusive homes but have been unable to access any adequate accommodation. Some women have been supported to return to their countries of origin but this does not mean that they are necessarily safer and this is a real safety concern for us, especially as the numbers of women identified are increasing.</p> <p>Another key challenge to providing our work on VAWG is the difficulties that welfare reform coupled with austerity has on the survivors we work with and also the organisations providing specialist support services. Women are disproportionately affected by all of the reforms and victims of VAWG are further victimised through high levels of financial control. We have sought to mitigate some of the impacts through development of the partnerships, the champion programme as well as external funding meaning that our VAWG work can be developed without huge levels of additional resourcing.</p>

Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence or view that suggests that different equality or other protected groups (including staff) could be adversely and/or disproportionately impacted by the proposal?

No

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposal were added / removed?

(Please note – a key part of the EA process is to show that we have made reasonable and informed attempts to mitigate any negative impacts. An EA is a service improvement tool and as such you may wish to consider a number of alternative options or mitigation in terms of the proposal.)

Where you believe the proposal discriminates but not unlawfully, you must set out below your objective justification for continuing with the proposal, without mitigating action.

Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes

How will the monitoring systems further assess the impact on the equality target groups?

We complete a VAWG performance matrix on a quarterly basis as well as completing returns to MOPAC on the VAWG training programme, including equalities information.

Does the policy/function comply with equalities legislation?

(Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)

Yes

If there are gaps in information or areas for further improvement, please list them below:

N/A

How will the results of this Equality Analysis feed into the performance planning process?

This will be monitored on a quarterly basis by the VAWG Steering Group which then reports to the Community Safety Partnership (CSP) on a monthly basis and completes the Strategic Assessment on an annual basis.

Section 6 - Action Plan

As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.

Please see attached VAWG performance matrix for actions and outcomes





Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Example				
1. Better collection of feedback, consultation and data sources	1. Create and use feedback forms. Consult other providers and experts	1. Forms ready for January 2010 Start consultations Jan 2010	1. NR & PB	
2. Non-discriminatory behaviour	2. Regular awareness at staff meetings. Train staff in specialist courses	2. Raise awareness at one staff meeting a month. At least 2 specialist courses to be run per year for staff.	2. NR	

Page 362

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress

Appendix A

(Sample) Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	Suspend – Further Work Required	Red 
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy.	Further (specialist) advice should be taken	Red Amber 
As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.	Proceed pending agreement of mitigating action	Amber 
As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	Proceed with implementation	Green: 

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Performance Matrix

1. Domestic Violence

Outcome	Key Agencies	Indicator	Means of Verification	Current: Q1 Update	Q2 Update
N/A	DV Forum	See DV Action Plan	DV Action Plan		

2. Sexual Violence

Outcome	Key Agencies	Indicator	Means of Verification	Current: Q1 Update	Q2 update
Victims of historical or current sexual violence are encouraged to report	Police (SC and O2)	Reported rates of sexual violence Sexual violence detection rates	Increased reporting of sexual violence to the police Increased detection rates		
3 rd party reporting sites for sexual violence are fully operational	3 rd party reporting centres	3 rd party reporting sites available for reports	Increased reporting of sexual violence from 3 rd party reporting sites.		
Agencies across all sectors in Tower Hamlets feel equipped to provide support or make appropriate referrals to support services	LBTH DV and Hate Crime Team SV Forum Health (CCG, Public Health, ELFT, BARTS Health)	Increased referrals to sexual violence support services by professionals in TH Professionals across TH access sexual violence training	Figures from HAVEN, ELRC and Police Training evaluation forms (including pre and post		

	<p>Adult and Child Safeguarding Boards</p> <p>Housing</p> <p>Specialist support services</p> <p>Education</p>	Increased referrals to MARAC	<p>questionnaires)</p> <p>MARAC referral figures</p>		
Victims of sexual violence are able to access timely, appropriate support (health and psycho-sexual support)	<p>HAVEN</p> <p>East London Rape Crisis (ELRC)</p> <p>Independent Sexual Violence Advocates (Open Doors and Respond)</p> <p>Victim Support Violent Crime Caseworkers</p>	Increased referrals to sexual violence support services	Reports from the sexual violence services		
Victims of sexual violence (especially in domestic abuse situations) are able to access support through GP and sexual health settings	<p>Public Health</p> <p>Sexual Health Providers</p> <p>GP Practices</p> <p>IRIS implementation group</p>	Increased referrals received by non-traditional sexual violence support	<p>IRIS evaluation</p> <p>Increased referrals to MARACs</p>		

3. Prostitution

Outcome	Key Agencies	Indicator	Means of Verification	Current Q1: Update	Q2 Update
Development of multi-agency coordination and accountability for prostitution	Tower Hamlets Prostitution Partnership (THPP)	Tower Hamlets' Prostitution Partnership established	4 meetings per annum with continued and increasing membership from across statutory and voluntary sector		
Women with 'red flag' indicators are supported to reduce their risk	Tower Hamlets Prostitution Partnership (THPP)	MARAC meetings created to support women engaged in prostitution where 'red flag' identified	Numbers of women referred to prostitution MARAC Numbers of women re-referred to prostitution MARAC		
Women engaged in prostitution are offered holistic support across health, housing, education and criminal justice	Tower Hamlets Prostitution Partnership (THPP) DIP Case Management Service Vice	Increased mandatory drug testing on arrest Reduction in criminal justice involvement Case management outcomes (see separate actions)	DIP Reports Criminal Justice involvement Numbers of arrests Case management indicators		

Agencies across Tower Hamlets feel supported to support women engaged in prostitution	Tower Hamlets Prostitution Partnership (THPP) LBTH DV and Hate Crime Team	Increased training to professionals across TH	Pre and Post Evaluation questionnaires		
Residents are engaged in partnership work to reduce prostitution related ASB	Tower Hamlets Prostitution Partnership (THPP)THPP LBTH DV and Hate Crime Team Residents	Increased support from residents towards supporting sex workers to address ASB	Hopetown Community Meetings LIFT campaign meetings Other resident meetings, including walkabouts in 'hot spot' areas		
Men who buy sex are targeted with police actions	Police	Decrease in demand for prosecution	Police Vice returns		

4. Child Sexual Exploitation

Outcome	Key Agencies	Indicator	Means of Verification	Current: Q1 Update	Q2 Update
N/A	LSCB CSE Sub-Group	See CSE Action Plan	CSE Action Plan		
Joint training around radicalisation and VAWG	LBTH Prevent Team	Increased training and awareness around links with	Post training evaluation		

	LBTH Domestic Violence and Hate Crime Team	extremism and VAWG			
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5. Female Genital Mutilation

Outcome	Key Agencies	Indicator	Means of Verification	Q1 Update	Q2 Update
Realistic prevalence figures for FGM are established in TH	North East London FGM Group City University Barts Health	Prevalence figure for TH established	FGM figures		
Women and Girls in the community who have undergone FGM or who are at risk are supported with health and psycho-sexual needs	Barts Health Education North East London FGM Group	Health and psycho-sexual counselling services are made available	Referral pathway and protocol established across health and education		
Health services develop routine enquiry for FGM as well as training for frontline health professionals	Barts Health Education Health Children's Social Care	Increased numbers of girls and young women established through routine enquiry	Barts Health midwifery figures School nursing figures Children's Social care figures		
A comprehensive training programme for professionals and young people is developed	North East London FGM Group	Development of youth Champions Programme recognising that	Pre and post evaluation questionnaires		

with the aim of raising awareness and working towards prevention of FGM. This includes peer support methods, including group sessions.	LBTH Domestic Violence and Hate Crime Team	young people will disclose to other young people. Training package developed and delivered			
Work with parents so that they understand the issues that young people face and can support their children, including starting from reception years.	LBTH Domestic Violence and Hate Crime Team Education	Continuation of the Whole School Approach awareness through coffee mornings, workshops at childrens centres and nurseries	Annual Evaluation Report School sign up.		
Work with young people so that they can recognise that pornography and the media send out the wrong messages to young people about what healthy relationships look like and about online safety.	LBTH Domestic Violence and Hate Crime Team Education	Continuation of the Whole School Approach awareness and Youth Campaign through wider dissemination of information around VAWG and online safety.	Annual Evaluation Report School sign up.		

6. Harmful Practices

Outcome	Key Agencies	Indicator	Means of Verification	Q1 Update	Q2 Update
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Realistic prevalence figures for HP are established in TH	HP Group DVHCT Police	Prevalence figure for TH established	HP figures		
Women and Girls who have experienced or are at risk of any form of HP are provided with appropriate support	HP Group Health (Barts Health, CCG and ELFT as well as other community health)	Increased referrals to health agencies of HP	Referral pathways and protocol established across health and education Referral figures for health for HP		
Joint working with faith groups and community groups is developed for all forms of HP, including FGM	Faith leaders Community leaders Health DVHCT	Faith and community leaders feel more supported to engage their faith communities on HP	Pre and post evaluation questionnaires Focus groups		

7. Stalking and Harassment

Outcome	Key Agencies	Indicator	Means of Verification	Q1 Update	Q2 Update
Stalking and harassment are recorded as separate crimes rather than an element of domestic violence	Police LBTH DV and Hate Crime Team (through DV1 forms)	Increased numbers of individual crimes of stalking and harassment are recorded	DV Database figures IDVA reports		

Women who experience stalking and harassment are supported with housing (including sanctuary)	Housing Sanctuary	Women who have experienced S&H have accessed appropriate support	DV Database figures Sanctuary scheme figures		
Women and girls who have experienced S&H are supported to develop appropriate support plans which are reviewed regularly	IDVA service Floating Support	Individual support plans are developed by appropriate support services	Women report increased support IDVA and Floating support reports		
Women and girls who have experienced are supported to ask for prohibitive orders including: non-molestation orders	OSS VS CPS Courts	Increased use of orders	Numbers of non-molestation orders applied for		
Develop links with some of the large employers in the borough to highlight the impact of VAWG on their staff.	LBTH Domestic Violence and Hate Crime Team	Establish links with Canary Wharf Group	Increased awareness of VAWG amongst CWG		

8. Trafficking

Outcome	Key Agencies	Indicator	Means of Verification	Q1 Update	Q2 Update
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Women and girls who have experienced trafficking are able to access appropriate support without fear of immigration sanctions	Police Violent Crime Service	Women who have experienced trafficking have accessed appropriate support	Police Data Violent Crime Service Data National Referral Mechanism data		
Bespoke training is developed for frontline professionals who may come into contact with trafficked women and girls	LBTH DVHCT Vice Team Licensing Trading Standards Children's social care and adult social care Hospitality and leisure industry	Frontline workers feel more supported to identify victims of trafficking	Pre and post evaluation questionnaires		
Public knowledge about spotting signs of trafficking is increased through awareness raising activities and community champions	Community Champions DVHCT	Run 2 Community Champions Training Programmes to recruit Champions. Community champions feel supported to be able to identify victims of trafficking Increased reporting	Police Data DV Database data		

		of trafficking			
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Objective	Activity	Total cost	Funding Source	Targets	Outcome	Lead Officer	Quarter 1 Progress Update (April - June 2016)
Ensuring support & protection for victims	1 Victim Support	£110K	LBTH core budget Home Office funding	Number of referrals received per quarter Number referrals per source Number of open and closed service deliveries Number of cases to MARAC % of clients engaged Number of referrals refused the service	Victims supported to increase their safety	Maddi Joshi Senior Service Delivery Manager, Victim Support	
	2 Sanctuary Project	£90K	LBTH HHAS	Number of victims referred per quarter Number of victims refused Number of works completed	Reduced repeat victimisation - victims supported to remain safely in their homes	Shahanaz Begum LBTH DV & HC Team	
	3 Third Party Reporting Project continue to promote TPR as means of reporting		Core Funding	Updates on reports & actions Number of training advisers each quarter	End of year feedback to the DV Forum reflecting outcomes and achievements	Benedicta Dikeocha LBTH DV & HC Team	
	4 Hestia Refuge & Floating Support Services		LBTH Supporting People	Number of refuge referrals received and accepted Number of floating support services referrals received and accepted Number of MARAC referrals received and accepted Number of IDVA referrals received and accepted Number of cases to MARAC % of clients engaged per quarter By THAWA/Look Ahead/Refuge	Victims of DV placed in temporary accommodation are provided with specialist support to live free of violence and maintain independent living/or living within their own homes	Sharon Benoit - Service Manager	
	5 Multiple Disadvantages DV Project	£64K	DCLG	4 Women with no recourse to public funds (NRPF) bedspaces & support 10 women receive emergency accommodation 40 professionals trained on capacity building for multiple disadvantaged clients 20 women receive legal support 30 women receive holistic support	Single women with NRPF receive wrap around support & accommodation	Menara Ahmed Helena Doyle (Look Ahead) Lucy Allwright (AVA) Rights of Women	
	6 MARAC		Core Funding	No of cases No of repeat cases presented Reduce number of repeat victimisation No of children involved in MARAC cases 96 MARAC cases to be heard per quarter (Bi-monthly meeting - 16 cases = 32 monthly)	To increase safety of victims through multi-agency partnership working	Nicola Proud (LBTH DV & HC Team)	
	7 DV One Stop Shop		Core Funding	Number of referrals Breakdown of gender referrals Referrals to the IPST	To allow access to a joint up working practice with key agencies and partners	Shahanaz Begum (LBTH DV & HC Team)	
	8 Homelessness Service DV Drop in Surgery		Core Funding	Overall analysis of works undertaken whilst at HOST	Joint up working practice with the housing professionals coming into contact with clients fleeing through DV.	Zahra Jones, DV & HC Team	
	9 Barkantine Medical Health Centre DV Drop in service	Core funding	Core Funding	How many referrals received in quarter involving DV How many cases referred to the MARAC	To provide a platform for anyone to approach and get advice about DV services as well as disclose to a DV professional	Shahanaz Begum (LBTH DV & HC Team)	

10	Barts Health NHS Trust DA Training Strategy			Numbers of staff trained at level 1, 2 and 3 (Implement and deliver the Barts Health domestic abuse training strategy)	Barts Health NHS Trust staff will be adequately supported when identifying and responding to domestic abuse by clear policies and pathways, training supervision and access to resources. Improved information sharing to increase the safety to high risk victims and their families. Barts Health will also contribute to the wider domestic abuse partnership work in Tower Hamlets.	Rosey Wrack Barts Health safeguarding domestic abuse sub group.	
11	Barts Health NHS Trust			To provide update on continued support on domestic abuse to the Health Visitor, school Health and Family Nurse partnership services through service level agreements.			
12	Barts Health NHS Trust Health Visitors and Family Nurses to have access to quarterly domestic abuse support groups			Update on quarterly domestic abuse support groups (Offer one in each Health Visitor locality per quarter and one for family nurses per quarter).			
13	Barts Health NHS Trust			Update on reaudit of Health Visitor, School Nurse and Family Nurse action on receipt of information about cases discussed at MARAC.			
14	Faith Regen Foundation (FRF): DV Worker to provide advocacy and 121 support to women who have experienced VAWG	FRF, Big Lottery Funding		The DV worker, based in the London Muslim Centre, will support 50 clients from April 2016 to April 2017	Ensuring support and protection for victims of DV	Julia Martin (Project Manager, FRF)	
15	ONE SUPPORT Focused support for YP coping with mental health WHITES ROW Engagement Activities "Cut the Funnel" "Talk it Out" "Open the Box"	TBC	One Housing Group	1. One 1:1 sessions every week 2. 2 engagement sessions offered each week for service users 3. On site access to a counsellor offered to all young people. 4. 25% customer engagement, monitored quarterly.	Supporting service users to cope with mental health, including emotional difficulties and domestic violence.	Christina Jewell, Team Manager, Whites Row Assessment Centre Faz Bukhari, Support Assistant, Whites Row Assessment Centre	
16	ONE SUPPORT Training & Resources		N/A	1. All staff to access domestic violence awareness training by 1st November 2016. 2. Safeguarding online training to be completed by all staff by 1st July 2016. 3. Support Assistants to ensure local resources are available and accessible related to domestic violence support.	All staff to be aware of domestic violence signs and how to signpost young people for support.	Faz Bukhari, Support Assisnat, Whites Row Assessment Centre. Nicolin Afflick - Harto, Support Assisnat, Whites Row Assessment Centre.	
17	ONE SUPPORT			1. 100 % of young people to discuss safeguarding and abuse with their Support Officers. 2. 1 social inclusion a quarter to focus on specific topic of safeguarding and abuse.	Young People to be aware of safeguarding and abuse, how to be respectful of one another, and where to access local resources.	Nicolin Afflick - Harto, Support Assistant, Whites Row Assessment Centre.	
18	The Kipper Project Staff team are trained around domestic violence and harmful practices by 31st March 2017		The Kipper Project	Update on staff training	Team are able to identify DV and know routes to support.	Anoushka Constantinescu (Kipper North Manager)	

<p>Ensuring support & protection for victims</p>	<p>19 London Black Women's Project (LBWP) provides women with free legal advice and rights based advocacy that supports survivors through the legal system. Information services cover domestic violence including HP and housing advice. Women also supported to access immigration advice.</p>			<p>Number of women supported per quarter</p>	<p>Provide a rights based approach for women and girls suffering all forms of violence</p>	<p>Baljit Banga</p>	
	<p>20 LBWP provides emergency accommodation for women & children. They offer housing support services, counselling services for both women and children, and resettlement support. Bedspaces available to support disabled women and women suffering from harmful practices.</p>			<p>Number of women supported per quarter</p>	<p>Services provided for women and children fleeing all forms of violence against women.</p>	<p>Baljit Banga</p>	
	<p>21 LBWP offers a support service to women and girls who are at risk or suffering domestic and sexual violence. Advocacy, individual intensive support, support groups and keyworking are offered.</p>			<p>Number of women supported per quarter</p>	<p>Support services provided to women and girls who are at risk or suffering domestic and sexual violence including harmful practices .</p>	<p>Baljit Banga</p>	
<p>Ensuring support & protection for victims</p>	<p>22 Housing</p>			<p>Number of DV referrals - Offers of temporary accommodation to families - Offers of temporary accommodation to single people - Breakdown of referrals by gender - Number of clients refused to further engage in DV services - Number of clients referred to MARAC - Number of clients referred to Sanctuary Project</p>	<p>Victim supported to increase their safety</p>	<p>George Denton-Ashley Riad Akbur/Janet V Slater (LBTH HOST/Children & Families Team)</p>	
	<p>23 Solace Women's Aid—advice line for DV victims/survivors who can receive telephone casework and/or be referred to other specialist services</p>			<p>Number of women from LBTH supported per quarter via telephone helpline</p>	<p>Victims receive telephone support as well as supported to access other specialist services</p>	<p>Stephanie Orel (leaving Solace on 29/07/16) from then onwards lead officer is Sharmeen Narayan</p>	
	<p>24 Praxis work to secure the fundamental rights of vulnerable migrants including refugees, survivors of human trafficking and gender-based violence and their families.</p>	<p>Praxis Community Projects</p>		<p>Number of individuals experiencing DV supported per quarter</p>	<p>Support for vulnerable migrants who are victims of domestic violence to understand their rights and the protection available to them. Move them away from a point of crisis, isolation and destitution towards safety, security, and the means to secure their own livelihoods. Victims are supported to report to police and access support from specialist services.</p>	<p>Alessandra Rossi Gender-based Violence caseworker at Praxis.</p>	

Raising awareness to encourage reporting of domestic abuse/ reducing social tolerance	1	IRIS Project			Joint up working practice with Victim Support and General Practitioners to ensure that the signs of domestic abuse are acknowledged and assisted with follow up support	Joy Parsons, Domestic Violence Manager, Victim Support	
	2	Barts Health NHS Trust to be actively involved in all domestic abuse partnership initiatives, including raising public awareness events.			Provide update on events	Barts Health will contribute to the wider domestic abuse partnership work in Tower Hamlets.	Rosey Wrack
	3	FRF: The aim is for Faith Leaders to hold sermons with a strong anti DV message and for Community Leaders to commit to campaigning against DV locally	FRF, Big Lottery Funding	Hold 4 workshops for Faith and Community leaders focusing on raising awareness of Harmful Practices	Greater awareness of DV and Harmful Practices. Reduction of social tolerance, stigma and fear of reporting DV	Julia Martin (Project Manager, FRF)	
	4	FRF: Hold HP awareness raising workshops for our women's ESOL class	FRF, Big Lottery Funding	For each 6 week course in the London Muslim Centre there will be at least one class about Harmful Practices and Tower Hamlets Council's DV leaflets will be given to the women.	Raising awareness and encourage reporting	Julia Martin (Project Manager, FRF)	
	5	Swan Housing	Swan Housing Association	One article to be included some time during 2016/17. Include at least one article about domestic abuse in The Communicator (newsletter for Swan Housing Association residents) each year.	Greater awareness of domestic abuse to encourage reporting.	Anna Williams (Housing Diversity Manager, Swan Housing Association)	
	6	Swan Housing Regularly promote awareness of domestic abuse and the help available on Swan's digital platforms.	Swan Housing Association	Provide update on digital platforms	Greater awareness of domestic abuse to encourage reporting.	Anna Williams (Housing Diversity Manager, Swan Housing Association)	
	7	The Kipper Project Up to date Domestic Violence posters at all schemes - recognising DV and support services. Posters checked at least monthly and new posters put up when received.	The Kipper Project	Provide update on posters	Greater awareness for service users to report concerns about neighbours and other service users.	Anoushka Constantinescu (Kipper North Manager, The Kipper Project)	

Raising awareness to encourage reporting of domestic abuse/ reducing social tolerance	8	LBWP – Specialist project Work with young women and girls will take place: advocacy and individualised support to young women and girls at risk and information and referral, workshops on healthy/unhealthy relationships, challenging attitudes and behaviours and raising awareness of violence and abuse.			Numbers of women supported	Address the normalisation, tolerance and acceptance of violence against women and girls	Baljit Banga	
	9	Domestic Abuse No Excuse Campaign - Team Publicity DV/VAWG Training Events/Multi Agency Events	TBC	Core Funding	10 annual community events - raising awareness of the Domestic Abuse, No Excuse campaign	To raise awareness and educate on issues of DV, DV approaches and DV Services and ensure that professionals and the community are aware of options available. This can and should include reduction of social tolerance of DV and increasing safer choice options for victims.	DV & HC Team	
Holding perpetrators of domestic abuse accountable/Improving sanction detection rates and successful prosecutions PO 879	1	DV Database		Core Funding	Number of referrals Overall number of cases Breakdown of gender Length of time taken to access a service (average months & years) Overall number of children living with clients	Reduce the average length of time victims experience DV before accessing specialist services	Zahra Jones (LBTH DV&HC Team)	
	2	MASH/IPST			How many referrals received in quarter involving DV How many cases referred to the MARAC Number of core assessments completed within quarter for which domestic violence was a feature. Number of children subject to Child Protection Plans under the emotional category	Improved working relationship with Childrens Services and partner agencies	James Coumbe, Strategic Performance Manager Eni Olatunde-Shittu, Performance and Data Manager - Social Care	
	3	Specialist Domestic Violence Court	£40k	LBTH	1. % decrease unsuccessful prosecutions (base line 41%) 2. % Improve victim attendance to court (base line 79%) 3. % increase in victim satisfaction within in the CJS (baseline 80%)	Improved effectiveness of trials in DV cases Increased confidence in the CJS by victims	Nenah Myriskos (LBTHDV & HC Team)	
	4	Domestic Violence Homicide		Police	Feedback provided to all relevant agencies Publication of DHR once quality assured from H.Office Recommendations formulated into action plan	To ensure that feedback is given to agencies and that recommendations of each review are provided to Forum members	Menara Ahmed	
	5	Positive Action Policy		Police		Mointoring of Met Positive Action Policy	Helen Barling (Met Police)	
	6	Clare's Law		Police	Overall arrest rate Number of Right to Know/Right to Ask Clare's Law	Monitoring of Clare's Law	Helen Barling (Met Police)	

	7	Positive Change Service		<p>The number of groups planned for men will be a minimum of 3 x 20 week programmes</p> <p>The number of groups for the children will be a minimum of 1 per school term</p> <p>The number of groups for the mothers/women will also be a minimum of 1 per school term</p> <p>The men will get 1 to 1 risk assessment work</p> <p>Partners or ex partners of those men will be eligible for 1 to 1 work</p> <p>Referrals target – 20 men – 20 women and their children per month</p>	<p>DV perpetrators have access to specialist assessment and group work intervention to reduce violence and abusive behaviour.</p> <p>Full time women's safety worker working one to one with women covering safety planning, emotional support and areas around healthy relationships and child centred parenting</p> <p>Women and children can attend a parallel programme to assist in healing and recovery and impact of DVA</p>		Kate Iwi - Co-ordinator Positive Change Service
Prevention of and early identification and intervention of domestic abuse	1	Domestic Violence Forum	Core funding	<p>Convene meetings of the Borough Domestic Violence Forum</p> <p>Consult with forum members on developing a local action plan</p> <p>Updates on the DV action plan</p>	<p>To develop and implement a multi agency strategy to prevent domestic violence and other forms of gender violence in Tower Hamlets and reduce the emotional and physical harm it causes to individuals and to the community as a whole</p>		Zahra Jones, DV & HC Team
	2	VAWG (see VAWG Action Plan for full list of projects)	MOPAC	<p>Number of events/training sessions delivered with professionals and community</p>	<p>To increase awareness of DV and promote support services available locally and nationally to victims/survivors. To raise the profile of partnership agencies working on VAWG strands.</p>		Zahra Jones (VAWG Training & Awareness Officer) + VAWG Strategy Manager + LBTH DV & HC Team Manager

Prevention of and early identification and intervention of domestic abuse	3	LBWP delivers the following activities: awareness raising workshops, violence prevention work and safety planning, and advocacy and support to those at risk or suffering violence and abuse.			Numbers of women supported	Identifying risk and providing support to young women and girls.	Baljit Banga	
	4	The Kipper Project Monthly Safeguarding Good Practice Meeting where incidents and trends are discussed and analysed	Providence Row Housing Association & The Kipper Project		Update on incident and trends discussed and analysed at Safeguarding Good Practice Group	Learning from national incidents disseminated across the organisation.	Anoushka Constantinescu (Kipper North Manager, The Kipper Project)	
	5	The Kipper Project MARAC without consent submitted where staff have serious concerns	The Kipper Project		Numbers of referrals to MARAC	Increased safeguarding inter-agency plans for vulnerable young women and men.	Anoushka Constantinescu (Kipper North Manager, The Kipper Project)	

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Objective	No.	Activity	Funding Source	Milestones for Each Quarter (Inc. Date & Deadline)	Outputs	Outcome	Lead Officer & Contact	Key Partners	Q1 Updates	Q2 Updates	Q3 Updates	Q4 Updates
1. To ensure that victims of all forms of hate crime have access to appropriate protection and support	1	Victim Support Tower Hamlets To ensure that clients have face to face visits.	Within Victim Support resources	Q.1-Q.4 All clients who request to be seen face to face will be offered a visit when it is safe to do so.	The Serious and Violent Crime Case Worker will see clients face to face.	Number of face to face visits.	Rob Calcutt / Biggi Stiller Victim Support	Victim Support				
	2	Victim Support Tower Hamlets To provide telephone support to victims.	Within Victim Support resources	Q.1-Q.4 All clients requesting telephone support will receive this.	Caseworkers and trained volunteers will provide support over the phone.	No of clients supported over the phone.	Rob Calcutt / Biggi Stiller Victim Support	Victim Support				
	3	Victim Support Tower Hamlets Establish a support desk at A&E Royal London Hospital.	Within Victim Support resources	Q.1-Q.4 Network with key contacts at A&E to set up a weekly support desk to take cases.	Caseworkers will visit A&E for half a day each week to take cases.	Successful engagement with teams and number of visits.	Rob Calcutt/ Biggi Stiller Victim Support	Victim Support				
	4	Police CSU - Offer relevant and appropriate support to victims of hate crime Where requested, victims to be visited in person by investigating officer	Within Police resources	Q.1-Q.4 Consider all victims of hate crime as 'vulnerable' thus ensuring enhanced service in line with the Victim Charter.	Victims visited where requested. Enhanced Service in line with Victim Charter.	Compliance with Victim Charter and MOPAC Hate Crime Strategy.	DI Helen Barling Police Community Safety Unit.	Police Community Safety Unit.				
	5	Police Community Safety Unit Police Community Safety unit to offer specialist advice to frontline officers regarding hate crime.	Within Police resources	Q.1-Q.4 A CSU 'advice line' to be retained 0800 - 2200 to offer specialist advice to front line officers. Q.1-Q.4 A substantive Detective Sergeant to be available to offer overnight advice.	Specialist advice is provided to front line officers.	Specialist advice is provided to front line officers investigating hate crime ensuring that thorough initial investigation is completed and documented.	DI Helen Barling Police Community Safety Unit.	Police Community Safety Unit.				
	6	Tower Hamlets Police Disability Engagement Team - Disability Hate Crime Project To ensure that victims of disability hate crime receive appropriate response, referrals to key partners and representations at ward panel meetings. Disability Hate Crime victims to be identified from the first point of contact with police. A project to build local database and recognise needs of all victims/ or suspects of disability hate crime.	Within Police resources	1. Advisory group established with representation from key partners, project scope and process agreed. 2. 1. Primary research completed. 3. Recommendations reviewed by relevant services and action plan developed to address identified service improvements.	Project report published.	Quality report with recommendations to improve service delivery, reporting, engagements, and confidence for victims/ suspects of disability hate crime.	Acting Sergeant Mehmet ULUSOY and PC Lara Reynolds - Tower Hamlets Police Disability Engagement Team	THVSS, Tower Hamlets Police Community Safety Unit, LBTH Community Safety Service, LBTH Consultation and Involvement Team, THIFF, LGBT Forum, LBTH Equalities and Local Voices (REAL).				
	7	Third Party Reporting Project (TPR) To further develop and maintain the existing Third Party Reporting Centres and recruit new organisations to become TPR Sites.	Within existing resources	Q.2-Q.3 Review and Update TPR Partnership Protocol. Q.1-Q.4 Recruit, register and train new organisations as TPR Sites (deliver joint training with CSU and DV reps, protocol to be signed/ issue all relevant information). Q.1-Q.4 Create a TPR Log.	TRP Partnership Protocol signed by all Centres. Existing and new individuals for each centre have been trained and re-/signed up to TPR protocol. New Centres recruited and operational. Council Website updated and containing accurate information on Hate Crime. Existing Centres contacted and Newsletter established	Master copy of TPR Protocol signed and filed. Victims have access to hate crime reporting sites across the borough. Victims are able to access appropriate support through effective TPR structures. Victims are able to obtain accurate information on hate crime services across the borough. Improved communication and information sharing between the TPR Centres. Enhanced victim support.	Benedicta Dikeocha - Hate Crime Projects Officer	LBTH DV & Hate Crime Team TPR Centres/ TPR Leads Police Community Safety Team Victim Support THNPFH				


<p>2. To deter & hold perpetrators accountable</p>	<p>8 Hate Incident Panel To coordinate the multi-agency panel which ensures a coordinated response to hate crime and incidents.</p>	<p>Within existing resources</p>	<p>Q.1-Q.4 Monthly meetings taking place where 100% of all cases referred are reviewed. Q.1- Q4 Service meetings and distribute minutes/ actions and case papers. Q.1-Q.4 Regularly update HIP Information Pack/ Contact list and distribute to partners. Q.1-Q.4 Monthly - Post HIP ensure all HIP Referrals are logged on central Excel Database for records. Q.1-Q.4 Quarterly monitoring reports produced showing referrals and outcomes of cases. Q.4 Annual report produced and distributed.</p>	<p>4 x Quarterly monitoring reports produced showing referrals and outcomes of cases. 1 Annual Report produced. Cases papers, minutes and action plan all distributed on time. HIP Database updated every month. 12 Panel meetings held. Updated Contact List and HIP Information Pack.</p>	<p>Monthly meetings held (12). Increased membership of HIP including RSL representatives. Increased referrals to HIP particularly from landlords and organisations not currently referring. Cases reviewed ensuring that all possible strategies for increasing the safety of victims or witnesses and imposing sanctions to deter repeat offending are fully explored and implemented in a co-ordinated way.</p>	<p>Nazma Begum Hate Crime Partnership Officer</p>	<p>Police Community Safety Unit Community Safety Operations Team Victim Support Scheme RSL's Tower Hamlets Legal Team LBTH Housing Advice & Options Youth Service</p>					
	<p>9 Registered Social Landlords (RSL's) and Housing providers Inform RSL's and Housing Providers of the Tower Hamlets Hate Incident Panel and encourage referrals and participation.</p>	<p>Within existing resources</p>	<p>Q.1 Identify RSL's and Housing Providers in Tower Hamlets. Q.2 Write to RSL's and Housing Providers with information about the Hate Incident Panel and how it operates. Q.3 Visit a minimum of 6 Housing providers and encourage sign up to the Hate Incident Panel. Q.3 Attend the RSL Forum and speak about the Hate Incident panel and encourage members to join. Q.4 Feedback to forum on outcome.</p>	<p>Major RSL's and Housing Providers written to. A minimum of 6 housing providers visited. RSL Forum attended</p>	<p>Housing providers better informed about the Hate Incident Panel. Increased referrals to the HIP. Increased sign up by housing providers to the Hate Incident Panel.</p>	<p>Nazma Begum Hate Crime Partnership Officer</p>	<p>Housing Providers/ RSL's</p>					
	<p>10 Police Community Safety Unit To reduce offending opportunities for Hate Crime.</p>	<p>Within Police resources</p>	<p>Q.1-Q.4 Intelligence Unit to identify trends and hotspots; intelligence disseminated to CSU and front-line responders through daily intelligence meetings and to Senior Management at bi-weekly tasking meeting. Q.1-Q.4 Local Authority in attendance at these meetings to ensure cohesive approach. Q.1-Q.4 Police will actively attempt to locate any identified offenders.</p>	<p>Intelligence disseminated to CSU and front-line responders through daily intelligence meetings & to Senior Management at bi-weekly tasking meeting. Local Authority in attendance at meetings. Police will actively attempt to locate any identified offenders in a timely manner.</p>	<p>Increase SD Rate</p>	<p>DI Helen Barling Police Community Safety Unit</p>	<p>Police Community Safety Unit.</p>					
	<p>11 Police Community Safety Unit To provide Quarterly Police Hate Crime Data to the NPFHF.</p>	<p>Within Police resources</p>	<p>Q.1 -Q.4 Provide information requested.</p>	<p>4 x Quarterly Police hate crime data report produced showing total number of hate crime reports received for each quarter. To be further broken down by each strand of hate crime.</p>	<p>Hate Crime data readily available for the forum to use.</p>	<p>DI Helen Barling Police Community Safety Unit</p>	<p>Police Community Safety Unit</p>					
	<p>12 Victim Support To participate in the monthly HIP panel and refer appropriate cases to the panel.</p>	<p>Within Victim Support resources</p>	<p>Q.1-Q.4 All clients who give their consent for referrals to the HIP will be referred if the case worker believes the panel could help achieve satisfactory outcomes/progress for the victim.</p>	<p>Case workers will refer appropriate cases to the HIP.</p>	<p>Number of ongoing and one off cases referred to the HIP.</p>	<p>Rob Calcutt/ Biggi Stiller Victim Support</p>	<p>Victim Support</p>					
	<p>13 To reduce exclusions and cyberbullying by producing a locally relevant mobile app to inform pupils about cyber safety and online conflict Developing an app with input from Tower Hamlets young people.</p>	<p>Within Behaviour Support Team resources</p>	<p>Q.1 Develop links with schools and identify groups of pupils. Q.2 Work with groups of pupils to gather views and material. Establish link with app developers. Secure funding when project is ongoing . Q.3 Work with developer to produce an app. Q.4 Launch app</p>	<p>Contact established. Materials gathered. App produced App gets launched online, in schools and in press.</p>	<p>Contacts established and meeting with staff and pupils. Materials ready, meetings with developers and funding secured App ready App shared with young people. Schools monitor use and impact.</p>	<p>Liam Mc Quade LBTH Behaviour Support Team</p>	<p>LBTH, George Green's, Morpeth, PRU TBC Developer LBTH, George Green's, Morpeth, PRU</p>					

<p>3. To prevent hate through promoting awareness, encouraging reporting and building community cohesion across all communities</p>	<p>14 No Place for Hate Campaign Awareness campaign promoting clear messages that Tower Hamlets is No Place for Hate. To promote a stronger partnership stand against hate in Tower Hamlets</p>	<p>Within existing resources</p>	<p>Q.1-Q.4 Maintain profile of Campaign through frequent press releases/East End Life articles highlighting positive initiatives /achievements/case outcomes. Supply information for media enquiries when requested via Corporate Comms. Q.1-Q.4 Encourage reporting of hate crime, including through dissemination of campaign materials and developing/maintaining partnerships with key organisations and members of the community. Q.1-Q.4 Maintain system to record number of stalls held, events attended, literature distributed and number of people reached. Q.1-Q.4 Seek opportunities to deliver /partake in outreach activities (minimum 4/5 outreach events to promote campaign and encourage reporting). Q.1-Q.4 Quarterly feedback to THNPFHF.</p>	<p>Deliver a min of 4-5 outreach activities per year. Set up stalls to mark notable dates in Hate Crime . Quarterly feedback to THNPFHF. Increase of sign up to both pledges. Direct engagement with members of the public to raise awareness on hate crime.</p>	<p>Community/ visitors are made aware of the range of hate crime support services and reporting facilities available in the borough. A strong message that LBTH is No Place for Hate. Increase of sign up to both pledges. Stronger partnership stand against Hate Crime in Tower Hamlets. Increased awareness of hate crime amongst individuals and organisations.</p>	<p>Benedicta Dikeocha Hate Crime Projects Officer Nazma Begum Hate Crime Partnership Officer LBTH Communications Team</p>	<p>DV and Hate Crime Team LBTH THNPFHF Partners Community organisations</p>				
	<p>15 Hate Crime Awareness Week 2016-17 Deliver outreach activities/ stalls during the week.</p>	<p>Within existing resources</p>	<p>Q2. Identify key sites to deliver outreach activities/ stalls Q2. Book dates and times for activities. Q2. Encourage THNPFH Forum to also deliver activities during Hate Crime Awareness Week. Q2. Publicise the activities locally. Q2. Deliver activities.</p>	<p>Direct engagement with members of the public to raise awareness on hate crime. A min of 2 outreach activities held during the week.</p>	<p>Increased awareness of hate crime amongst communities and visitors in Tower Hamlets.</p>	<p>Nazma Begum Hate Crime Partnership Officer</p>	<p>Benedicta Dikeocha Hate Crime Projects Officer Domestic Violence Team Police THNPFHF Members</p>				
	<p>16 No Place for Hate Pledge To promote a stronger partnership stand against hate in Tower Hamlets.</p>	<p>Within existing resources</p>	<p>Q.1-Q.4 Process all pledges submitted via web, from outreach events or in person following the Pledge Maintenance Guidance. Q.4 Increase of individuals signed up to the pledge (baseline 1295) Q.4 Increase in organisational pledge sign ups (baseline 117) Q.3 Develop Pledge Complaints Procedures. Q.3 End of year feedback to THNPFHF.</p>	<p>Increase in sign up to both pledges.</p>	<p>Increase of sign up to both pledges. Stronger partnership stand against Hate Crime in Tower Hamlets. Increased awareness of hate crime amongst individuals and organisations.</p>	<p>Nazma Begum Hate Crime Partnership Officer</p>	<p>Benedicta Dikeocha Hate Crime Projects Officer THNPFHF Members</p>				
	<p>17 No Place for Hate Champions Recruit, train and support 10 NPFH Hate Champions to cascade hate crime awareness activities and training in the community.</p>	<p>Within existing resources</p>	<p>Q.1 Recruitment process for NPFH Champions to be completed including promoting, shortlisting and selecting. Q.2 Deliver the Champions Training Programme to develop Champions Q.3-Q.4 Seek opportunities for activities (training and outreach) for Champions to deliver, encouraging an increase in NPFH Pledge sign ups.</p>	<p>Quarterly updates to THNPFHF</p>	<p>Existing network of individuals working in key community settings to promote awareness that Tower hamlets is No Place for Hate and build community resilience to the impact of hate.</p>	<p>Benedicta Dikeocha / Menara Ahmed LBTH Hate Crime & DV Team</p>	<p>Domestic Violence & Hate Crime Team NPFH Hate Champions</p>				
	<p>18 Children Centres in Tower Hamlets Inform all Children Centres in Tower Hamlets about the NPFH Campaign and invite them to join the NPFH Pledge.</p>	<p>Within existing resources</p>	<p>Q.2 Identify list of Children Centres in Tower Hamlets to contact. Q.3 Write to all Children Centres with copies of pledges, publicity materials and information about the THNPFH Forum and the Hate Incident Panel. Q.4 Report back to the THNPFHF on outcomes.</p>	<p>All Children Centres in Tower Hamlets written to and sent information.</p>	<p>Better awareness of the NPFH Campaign, Pledge, Forum and the HIP in Children's Centres. Sign up to the pledge.</p>	<p>Nazma Begum Hate Crime Partnership Officer</p>	<p>Children's Centres</p>				
	<p>19 Hospitals and GPs in Tower Hamlets Inform all GP's in Tower Hamlets about the NPFH Campaign and invite them to join the NPFH Pledge. Raise awareness of the THNPFH and Hate Incident Panel encouraging referrals.</p>	<p>Within existing resources</p>	<p>Q.2 Identify list of Hospitals and GP's in Tower Hamlets to contact. Q.3 Write to all Hospitals GP's with copies of pledges, publicity materials and information about the THNPFH Forum and the Hate Incident Panel. Q.4 Report back to the THNPFHF on outcomes.</p>	<p>All GP's and Hospitals written to and sent information.</p>	<p>Better awareness of the NPFH Campaign, Pledge, Forum and the HIP in GP's and Hospitals. Sign up to the pledge.</p>	<p>Nazma Begum Hate Crime Partnership Officer</p>	<p>Hospitals and GP's</p>				
	<p>20 Hate Crime Awareness Training Deliver training and workshops on Hate Crime awareness as far as resources allow.</p>	<p>Within existing resources</p>	<p>Q.1-Q.4 Identify Services that need to be trained. Q.1-Q.4 Deliver training in partnership with the DV Team. Q.3 Feedback to THNPFHF</p>	<p>Training sessions delivered and records kept.</p>	<p>Increased awareness of hate amongst Services and professionals. Increase in the number of individuals and organisations aware of hate crime and support available (Measured through evaluations, feedback and records kept) Increased awareness of how to make referrals to both Hate Incident Panel. To encourage new agencies to attend the NPFH Forum and HIP Panel.</p>	<p>Benedicta Dikeocha Hate Crime Projects Officer</p>	<p>LBTH DV & Hate Crime Team TH NPFHF Partners</p>				
	<p>21 Victim Support Tower Hamlets To provide information about the Victim Support's Serious and Violent Hate Crime Project.</p>	<p>Within Victim Support resources</p>	<p>Q.1-Q.4 Produce service information.</p>	<p>Caseworkers will produce and distribute information to help make the service accessible.</p>	<p>Produce leaflets and referral forms.</p>	<p>Rob Calcutt Biggi Stiller/ Victim Support Tower Hamlets</p>	<p>Victim Support</p>				

	22	Victim Support Tower Hamlets 'Guest' edit an edition of East End Life.	Within Victim Support resources	Q.3 By the end of Q3 to edit an edition of East End Life that reflects the issues facing and issues relating to all strands of Hate Crime (Age, Disability, Religion, Belief, Gender, Sexual Orientation, Marriage and Civil Partnership, Pregnancy and Maternity, Gender Realignment) and how this is reflected in the borough.	Victim Support will guest edit and source articles and features for this edition.	Produce copy for this paper.	Lead taken by Maddi Joshi/ Rob Calcutt/ Biggi Stiller Victim Support	Victim Support aided by community groups and LBTH				
	23	Victim Support Tower Hamlets To send out notices with Council tax bills stating that Tower Hamlets positively supports the groups covered by all the Hate crime strands. It has a No Place for Hate Pledge.	Within Victim Support resources	Q.1-Q.3 Maintain contact with LBTH Communications Team to try and get a listing inclusion in the council tax bill mailer and accompanying booklet.	The council will produce the copy which would need the approval of the No Place for Hate Forum.	Council with advice from NPFHF.	Victim Support	Council				
	24	Victim Support Tower Hamlets To assist with delivering presentations, workshop and attending events when resources allow.	Within Victim Support resources	Q.1-Q.4 Victim Support will where possible participate in events which cover the issue of Hate Crime.	Staff and volunteers will attend appropriate conferences, events (when case loads allow).	Types of events covered.	Maddi Joshi/ Rob Calcutt Biggi Stiller Victim Support	Victim Support				
	25	SWAN Housing - Work with our partners and residents to prevent hate crime and harassment and support victims / survivors. Include at least one article about hate crime and harassment in The Communicator (newsletter for residents each year).	Within SWAN resources	Q.4 Article to be published in or before Q.4.	Article published	Article included in The Communicator (newsletter for Swan residents) each year.	Anna Williams Swan Housing Association	N/A				
	26	SWAN Housing - Work with our partners and residents to prevent hate crime and harassment and support victims / survivors. Regularly promote awareness of hate crime and harassment and the help available on Swan's digital platforms.	Within SWAN resources	Q.1-Q.4 Ongoing	Tweets, Facebook posts etc.	Awareness of hate crime and harassment and the help available is promoted on Swan's digital platforms.	Anna Williams Swan Housing Association	N/A but any suggestions regarding organisations that we can follow on social media in order that we can retweet news items etc. welcomed				
	27	Community Cohesion Intergenerational work Breaking Barriers Reducing Crime & Getting along together. Commissioning a range of Cohesion activities, including the understanding of Faith and Belief in Tower Hamlets, the support of Community Engagement Forums such as the Interfaith Forum and forums for LGBT and Disabled communities, New Residents and Refugee Forum; Mosque and Community Engagement Service; cohesion projects in Mile End and Aldgate East Masterplan areas; and other activities through mainstream grants and One Tower Hamlets Funding.	Within their resources	Q1. Review funding (where contracts have breaks), commission and continue monitoring providers. Q2. Council support to help organisations to develop projects through action learning sessions and begin developing projects. Q3. Monitoring period and evaluating projects. Q4. Final report on projects.	Evaluate projects and measure successes and outcome.	Improved relationships of various groups Awareness, respect and appreciation of different ethnicities, religions, identities Reduced crime Mutual Trust and understanding Working together to protect the environment and social factors of the community.	Iqbal Raakin SPP Officer One Tower Hamlets LBTH Cohesion and Equality Team	St Hilda's Society Links Mile End Community Project East London Chinese Community Centre RE Today London Tigers Ebrahim College Tower Hamlets CVS Praxis ELOP REAL Betar Bangla City Gateway Dorset Community Association East London Advanced Technology London Gypsy and Traveller Unit Newark Youth London Somali Parents and Children's Play Association Stifford Community Centre Rooted Forum Uprising Wapping Bangladesh Association				
	28	To raise awareness of LGBT hate crime - IDAHOBIT EVENT Hatred Hurts All Conference – aimed at those that work with victims of hate crime.	Within ELOP resources	Q1 – Conference to be held. Q2 Report of recommendations produced from conference.	40 people attending.	Increased visibility of LGBT hate crime, increased intersectionality responses, report of recommendations to support victims / increase reporting	ELOP & TH LGBT Community Forum S Humphreys	TH Police GALOP Positive East TH Domestic Violence & Hate Crime Team				
	29	To inform members of the LBTH LGBT Community Forum of NPFHF Raise awareness of pathways for hate crime reporting.	Within ELOP resources	Use social media channels and newsletter inclusion.	Disseminate information each month re: e.g. Third Party Reporting venues.	Raise awareness of pathways for hate crime reporting.	Susha Eng – TH LGBT forum / ELOP	THLGBT Forum				
	30	To gain insight into local people experiences and promote good practice in challenging homophobia, biphobia and transphobia Write a report on homophobia, biphobia and transphobia in the work place and in education.	Within ELOP resources	Gather information on experiences, examples of good practice where pro active work it taking place.	1 Report with recommendations.	Action plan for implementation of recommendations.	Susha Eng – TH LGBT forum / ELOP	ELOP/TH LGBT community Forum				

	31	Tower Hamlets Homes - INTRANET LINK/INFORMATION Improve information held on intranet internally and externally and provide short cut for customers and staff to the information.	Within THH resources	Q.2 Link in with existing comms working group July/August 2016	Simplified reporting process for victims and witnesses of Hate Crime and Hate Crime incidents.	Improve information with shortcut for customers and staff.	Tracey Barrett ASB Officer, but as notified other THH staff may already be managing this as an ongoing project.	THH Comms Team THH Management Team ASB staff				
	32	Tower Hamlets Homes - Noticeboards To ensure that all victims of hate crime have access to information to enable them to be informed and to know where to go for support and advice. Identify suitable locations for displaying information throughout THH stock.	Within THH resources	Q.1 May 2016 - Notice Board/location check. Q.1 May .2016- Obtain up to date poster/contact information from HIP. Q.2 June/July 2016- Ensure installation of information across all housing stock.	All noticeboards checked and updated.	Increase in reporting by victims and witnesses Safer and confident communities	Tracey Barrett ASB Officer Tower Hamlets Homes	Tower Hamlets Homes L.B.T.H. Metropolitan Police Victim Support				
Key			Key									
Milestones for this quarter met		Awaiting for update/ or no new updates		this quarter/ capacity issues / lack of funding/ Other								
Milestones for this quarter nearly met												
Milestones for this quarter not met												

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<p>Non Executive Report of Council</p> <p>5th December 2016</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Corporate Director Development & Renewal</p>	<p>Classification: Unrestricted</p>
<p>Housing Strategy 2016 - 2021</p>	

Originating Officers	Martin Ling – Housing Strategy Manager
Wards affected	All

1. SUMMARY

- 1.1 The Council’s last Housing Strategy ran from 2009 to 2012 and has not been updated since. Under article 4a – Policy Framework of the Council’s Constitution, the Housing Strategy is listed as a discretionary strategy which if produced must be approved by the Council.

- 1.2 The Mayor agreed that the Council should work towards the development of a comprehensive Housing Strategy in 2016. A programme of consultation was launched on Monday 16th May 2016 with an article in *East End Life* by Mayor John Biggs setting out his concerns with regard to the measures contained in the Housing and Planning Act 2016 and informing residents that the Council will respond by developing a new Housing Strategy. The first stage consultation ran from 16th May to 31st July 2016. A second stage of consultation ran from September 16th to October 10th 2016.

- 1.3 The Strategy has regard to the duties placed upon the Council by the Housing and Planning Act 2016. In addition it will need to respond to the housing priorities of the new Mayor of London, elected in May 2016. The Council is not statutorily required to have a Housing Strategy but if it chooses to do so it must have regard to Section 333D of the Greater London Authority Act 1999 which requires that any local housing strategy prepared by the Council must be in general conformity with the London Housing Strategy. Officers have met with senior managers at the Housing and Land Delivery Team at the GLA who have provided technical comments on the draft which have been incorporated into Appendix 1. The Council received a letter from the GLA on the 10th November 2016 stating that they ‘confirm the GLA considers the strategy to be in general conformity with the Mayor of London’s emerging housing

policies, given that the London Housing Strategy was adopted under the previous Mayor.

2. RECOMMENDATIONS

To adopt the draft Housing Strategy and attached appendices.

2.1 REASONS FOR THE DECISIONS

To enable the Council to meet its statutory housing duties, tackle housing need, improve conditions across all housing tenures and promote partnership working with housing providers, the private and voluntary sectors and residents.

2.2 ALTERNATIVE OPTIONS

The Council could decide not to adopt a Housing Strategy

3. BACKGROUND

At present the Council has the following housing and policy statements:

Allocations Scheme (statutory)	Approved 2013
Tenancy Strategy (statutory)	Approved 2013
Homelessness Statement 2013 /17	Approved 2013
Older Persons Housing Statement 2013 /15	Approved 2013
Overcrowding and Underoccupation Plan	Approved April 2016
Private Sector Renewal Policy	Approved April 2016

3.1 Statutory Documents

As part of the process of producing a new Housing Strategy the Council will need to update its statutory documents. The revisions to the allocations scheme and tenancy strategy will be updated separately. The changes to the allocation scheme are summarised in section 5.1 of the second stage consultation document at Appendix 1 for information.

Conditions with regard to the Tenancy Strategy will be subject to regulations provided by the Secretary of State as set out in the Housing and Planning Act 2016 and will be brought forward in advance of the implementation date which is expected to be April 1st 2017.

3.2 Other relevant Housing documents

In addition to the above reports, the Housing Revenue Account (HRA) Medium Term Financial Plan, proposals for the development of a Housing Company and Fuel Poverty Strategy will also be taken to Cabinet separately and programmed accordingly.

3.3 Other policy areas have been updated following the consultation process and incorporated into the housing strategy with a separate Homelessness Policy

and a separate Private Rented Sector Policy produced as appendices. These documents are attached at Appendix 2 and 3.

3.4 The Housing Strategy, is mindful of other strategic plans produced by the Council including:

- The Community Plan
- The Strategic Plan
- The Local Plan
- The proposed Growth Strategy.

Commissioning Strategies relating to vulnerable adults:

- Hostels Plan
- Sheltered Housing Plan
- Accommodation Strategy for people with Learning Disabilities.

Other corporate documents including:

- Health and Wellbeing / Better Care Fund
- Children and Families Plan.

4. Progress to date

4.1 As set out above, the Council embarked upon a six month programme to develop a new Housing Strategy.

4.2 The programme was launched on Monday 16th May 2016 with an article in *East End Life* by Mayor John Biggs setting out his concerns with regard to the measures contained in the Housing and Planning Act 2016 and informing residents that the Council will respond by developing a new Housing Strategy.

4.3 The first stage consultation (16th May 2016 – 31st July 2016) comprised publication of:

- An online survey for respondents to complete (comprising a short and a long survey, seeking people's opinions and comments on issues that were identified as important to the borough's new housing strategy)
- A housing strategy challenges and options paper
- Internal and external partner consultation programme
- Resident engagement programme.

Both stages of the consultation were successful and informative with a total of nearly 20 public engagements, 15 internal and partner meetings including an all Member seminar and over 450 surveys completed by the public. Several strong messages emerged including:

- Major concern over the shortage of affordable housing in the borough and concern that future higher rents set by the Council and housing associations will force people out of the borough

- Lack of housing choices for young people brought up , living and working in the borough meaning many on average incomes will be forced to stay at home, move out or pay high rents in poor quality private rented housing
- Support for the development of 'living rent' homes for this group at sub market levels on new build schemes developed on council estates
- Concern over population growth, impact on the environment and green spaces and whether vital infrastructure including schools, health centres, waste collection and transport links will be developed to match the needs of the population
- General support for the Council's approach to meeting housing need and homelessness through prioritisation of households in most need and a comprehensive advice service.

A link to the online survey and related papers can be viewed here:

www.towerhamlets.gov.uk/housingstrategy2016

A full report on the first stage consultation is attached at Appendix 4.

4.4 Comments from Housing Associations and Developers

A small number of Housing Associations and developers provided written comments on the 2nd stage. In summary the comments generally welcomed the focus on a wider range of housing products; stated that London Plan targets (including those for the Opportunity Areas) for the borough be considered as minimum rather than maximum targets; the council should look more closely at 'build to rent' models of housing (i.e., new build private rented housing). Specific responses regarding whether the council should accept commuted sums in return for not requiring affordable housing provision onsite should be considered on a site by site basis as the approach potentially defeated the objective of achieving mixed and balanced communities. These comments will also be considered through the ongoing consultation on the Local Plan.

4.5 Feedback from the Housing Scrutiny Sub-Committee

The Housing Scrutiny Sub - Committee considered the draft Housing Strategy documents at its meeting on the 10th October 2016. The discussion centred on the following issues:

Ensuring access to affordable home ownership options available through the private sector and models such as the Community Land Trust at St Clements hospital in Mile End is considered as future development opportunities arise.

Developing inclusive models for regeneration across both Council and ex Council estates, building on the lessons learnt from the regeneration of the Ocean Estate and Blackwall Reach.

Investigating the use of off-site produced modular housing for use in permanent housing in order to reduce costs.

Ensuring the further development of the Homelessness Action plan takes into account the recommendations of the recent Overview and Scrutiny Commission report.

Concerns over the Council's role in ensuring Registered Providers can be held to account in terms of their contribution to the Council's Community Plan and housing management performance.

Comments regarding the reach of the consultation and whether all groups were able to contribute effectively.

These issues have been broadly covered across the Strategy documents and will be taken forward through the development of the action plans and associated projects.

- 4.6 In total the consultation period lasted 16 weeks through the two stages. In addition to seeking comments on the consultation documents, a series of meeting with partners and representative groups took place and a successful housing conference attended by around 100 people was held on Saturday 1st October 2016.

The final draft Housing Strategy was considered by the Mayor in Cabinet on 1st November and recommended for adoption at Council on the 5th December 2016.

5. KEY ISSUES WITHIN THE HOUSING STRATEGY

- 5.1 The changes in the housing market, pressure on affordability and the impact of the Housing and Planning Act 2016 will all place constraints on the how the Council can respond to the significant challenges ahead with limited resources. Consequently there are difficult choices to make. Set out below are some of the key priorities that have arisen during the development of the Housing Strategy:

- Maximising affordable housing building from all sources of housing supply, with a focus on the borough's three opportunity areas.
- Agreeing how best to allocate homes, balancing different needs including reducing the number of families in high cost temporary accommodation both inside and outside the Borough.
- Setting up a housing company to deliver new homes both inside and outside the borough.
- Exploring the merits of the council buying or developing its own hotel to meet emergency housing needs and to develop directly, or in partnership with Registered Providers, a portfolio of temporary accommodation for homeless households.
- Developing a comprehensive approach to improving conditions in the private rented sector.

- Continuing to develop effective partnership working relationships with Tower Hamlets Homes, housing association and voluntary sector partners, residents and other stakeholders.

6. COMMENTS OF THE CHIEF FINANCIAL OFFICER

- 6.1 This report provides an update on the consultation that has been undertaken on the draft Housing Strategy for 2016 to 2021, and asks Council to approve the adoption of the Strategy.
- 6.2 The Housing Strategy contains various policies and statements setting out a range of activities and priorities for the Council and key partners that will provide a clear focus for ensuring that available resources are targeted to and are in line with these needs. The report also identifies a number of related Council strategies that will inform the development of the Housing Strategy. Similarly it is important to recognise the financial implications and effects of the Housing Strategy in both the Council's Capital Strategy – where the affordability and phasing of investment identified through the Housing Strategy will be established and the Medium Term Financial Strategy where the revenue implications will be reflected. Taken together these will allow members to undertake the necessary evaluation and prioritisation of the Housing Strategy alongside the key priorities as set out in its Corporate Plan.
- 6.3 The implementation of the various elements of the strategy will be subject to the availability of funding, and further reports assessing the financial impact of individual proposals will be submitted in future to the Mayor in Cabinet. Delivery of the strategy will be extremely challenging in the current economic climate, particularly in view of the uncertainty surrounding the implications of the recently enacted Housing and Planning Act where much of the financial detail will only become clear when secondary legislation is published over the coming months. The strategy will require a co-ordinated approach and alignment of funding from all major partners, and will also require that best value is obtained from limited sources of external funding, given that the Council's mainstream resources to support the strategy are extremely limited.
- 6.4 The Council's gross 2016-17 revenue budget for housing related services is £127.253 million, consisting of £2.254 million for Lettings, £35.427 million for Homelessness and £89.572 million for the Housing Revenue Account. The costs of preparation and consultation on the Housing Strategy and its constituent elements are being met from within existing revenue resources.

7. LEGAL COMMENTS

- 7.1 The Council is a local housing authority and pursuant to section 333D(1) of the Greater London Authority Act 1999 ('the 1999 Act') when exercising any function relating to housing or regeneration, the Council shall have regard to the London housing strategy. Section 333D(2) of the 1999 Act provides that any local housing strategy prepared by a local housing authority in Greater London must be in general conformity with the London housing strategy.
- 7.2 The term 'general conformity' is not defined in the 1999 Act. In the context of the 1999 Act, 'general conformity' would allow a considerable degree of

movement between the London housing strategy and the Council's housing strategy. There does not have to be strict conformity but providing that the Council considers or includes the main features or elements of something then that will be sufficient. In that regard, communications have taken place with senior managers at the Housing and Land Delivery Team of the Greater London Authority for their confirmation that the strategy is in general conformity.

- 7.3 A local housing strategy is defined in the 1999 Act as any statement of the local housing authority's policies or proposals relating to housing.
- 7.4 Whilst the Council is not under a duty to have an overarching Housing Strategy, such can reflect the core values and goals and the underlying strategies for achieving them. The overarching strategy can provide clear direction for the Council and its partners in meeting housing expectations.
- 7.5 Further, the Strategy can consider the implications of the Housing and Planning Act 2016 ('the 2016 Act') and which received Royal Assent on 12th May 2016 and is now enacted. The Act was published on 23rd May 2016 and contains a number of housing impacts for local authorities including provisions on new homes (including starter homes); landlords and property agents; abandoned premises; social housing (including extending the Right to Buy to housing association tenants, sale of local authority assets, 'pay-to-stay', and secure tenancies), planning; compulsory purchase; and public land (duty to dispose). Whilst, subordinate legislation (e.g. Statutory Instruments) is required to introduce relevant sections of the 2016 Act into force, it would be prudent for the Housing Strategy to consider such so as to lessen any potential impacts.
- 7.6 The Housing Strategy is a discretionary policy within the Council's Budget and Policy Framework and therefore its final approval is for Full Council. However, pursuant to the Council's Budget and Policy Framework Procedure Rules, the Mayor as the Executive has the responsibility for preparing the draft plan or strategy for submission to the full Council. It is therefore for the Mayor in Cabinet to recommend the adoption of the strategy to Full Council. This was considered by the Mayor in Cabinet on 1st November 2016.
- 7.7 There was no statutory requirement to consult but the Council was required to consider whether a common law duty arose. This common law duty imposes a general duty of procedural fairness upon public authorities exercising a wide range of functions which affects the interests of individuals. On balance, it was considered advisable to consult and this report contains details of such consultation.
- 7.8 The consultation had to comply with the following common law criteria:
 - (a) it should be at a time when proposals are still at a formative stage;
 - (b) the Council must give sufficient reasons for any proposal to permit intelligent consideration and response;
 - (c) adequate time must be given for consideration and response; and
 - (d) the product of consultation must be conscientiously taken into account.

7.9 In respect of (a) to (c) above, this was met. With regard to (d) above, before recommending the Housing Strategy to full Council, Cabinet was required to conscientiously take into account the consultation responses and, in particular, Cabinet had regard to the Consultation Report at Appendix 4 as well as the evidence base at Appendix 5. Full Council will also have to conscientiously take into account the consultation responses prior to adopting the Housing Strategy.

7.13 When deciding whether or not to proceed with the proposals, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who don't (the public sector equality duty). To inform the Council in discharging this duty an Equality Assessment will be carried out on the Housing Strategy

8. ONE TOWER HAMLETS CONSIDERATIONS

8.1 An Equality Assurance Impact Assessment has been completed which does not identify any adverse impact of the draft proposals on the equality groups of the nine protected characteristics. A full assessment of individual policies which emerge from the Housing Strategy will be carried out and if any potential negative impacts are identified mitigating actions will be identified accordingly.

9. BEST VALUE (BV) IMPLICATIONS

9.1 The proposals set out in Housing Strategy will be required to align with the Council's Best Value Duty.

10. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

10.1 The Housing Strategy will have implications for sustainable actions for a greener environment and these will be considered within its development.

11. RISK MANAGEMENT IMPLICATIONS

11.1 The proposals set out in the Housing Strategy will carry risks for the Council. Each action is separately monitored and subject to local risk management conditions by either the Council or its partners.

12. CRIME AND DISORDER REDUCTION IMPLICATIONS

12.1 Well managed housing in secure neighbourhoods can contribute to the Council's ability to reduce crime and disorder in the borough. The Council works with its housing association partners and the police to tackle anti-social behaviour at an estate level and the development of further partnership through the delivery of the Housing Strategy will assist in taking forward this objective.

13. SAFEGUARDING IMPLICATIONS

13.1 Not applicable.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Appendix 1: Draft 2016-21 Housing Strategy
- Appendix 2: Outline Draft 2016-21 Homelessness Strategy
- Appendix 3: Outline Draft 2016-21 Private Sector Housing Strategy
- Appendix 4: Consultation Report
- Appendix 5: 2016 – 21 Housing Strategy Evidence base
- Appendix 6: Equalities Impact assessment

- **Officer contact details for documents:**
- n/a

- **Originating Officers and Contact Details**

Name	Title	Contact for information
Martin Ling	Housing Strategy Manager	020 7364 0469

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London Borough of Tower Hamlets 2016–21 Housing Strategy

Building new homes and communities in Tower Hamlets

Introduction from the Mayor of Tower Hamlets

Housing is the biggest issue facing Tower Hamlets residents – as my postbag and email inbox confirms every day. I spend a lot of time thinking about what the council should do to help.

In this borough we have a wide gap between those with the highest incomes and wealth and those in poverty. We have very high value homes and land values and widespread affordability challenges because our most socially and economically excluded households are on very low incomes.

The shortage of affordable housing has led to high numbers of homeless families and thousands of families still overcrowded. Other households with both physical and other disabilities require our assistance. Although our ageing population is relatively small we expect it to grow, and we have a duty to help this group remain independent within their own homes – or to provide extra care and support where it is needed.

We now have a very mixed economy of providers with a diminishing number of council homes, a large number of Housing Associations providing most of the social housing, a massive growth in private rented housing, and declining homeownership. This has all happened over a relatively short period of time.

This profile presents numerous challenges for us - in terms of both future planning and day to day provision of services - which this Strategy will seek to address.

As Mayor I pledged to build 1,000 new council homes, and to look at helping residents who are being priced out of renting or buying in their local area. I also want to work with housing associations to ensure they are financially sustainable and properly accountable to their residents. I want to support private renters, promoting awareness of private tenants' rights and responsibilities.

This document sets out how we intend to meet these challenges. It is about more than new housing delivery as residents draw on a range of services that the council provides.

Mayor John Biggs

Executive Summary

The lack of decent quality, affordable housing is the major challenge the council and its residents and stakeholders currently face. Despite the borough being the top deliverer of affordable housing in any English local authority district over 2012-15, we need to continue to build more homes, but at a price that people can afford. We need to ensure that the homes available to us are allocated fairly and that we explore all options necessary to meet housing need. This strategy focuses also on the standard of private rented housing and how we can improve it, as it is now the largest segment of the housing market. This broader vision to our approach is set out in the *Tower Hamlets Partnership Community Plan 2015*. The Community Plan themes focus on making the borough:

- A great place to live
- A fair and prosperous community
- A safe and cohesive community
- A healthy and supportive community.

To deliver the housing aspects of our vision in the Community Plan, this housing strategy seeks to ensure that:

- there are housing choices for all sections of our diverse community
- the homes people live in are in a decent condition, warm, and weathertight
- the most vulnerable people's housing needs are met in a fair and inclusive way
- all homes are in safe, prosperous and thriving areas
- our response to housing issues is measured and achieves value for money

To deliver this vision, we have broken down our approach into four broad themes, identifying the challenges and setting out the policy actions that we've identified to meet them.

On the first theme, **delivering affordable housing, economic growth and regeneration**, the actions we intend to undertake include:

- Maximising affordable housing building from all sources of housing supply, with a focus on the borough's three opportunity areas
- Using council-owned sites to deliver 100% rented housing combining social target rents and homes at a Tower Hamlets Living Ren, some of which could be developed through a council owned Housing Company or a Housing Company in which the Council retains an interest.
- Developing clear affordable housing policy for market sale, for discounted market sale including Starter Homes and shared equity schemes and subsidised home ownership.

On the second theme, **meeting people's housing needs** the actions we intend to undertake include:

- Refreshing the Common Housing Register Allocation Scheme to widen housing options, giving priority to those in housing need and using private rented housing and other suitable accommodation to meet housing needs
- Developing and implementing an intermediate housing register

- Refreshing our Homelessness Statement into a Strategy and aligning it with the 2016-21 Housing Strategy
- Supporting the development of the Accommodation Plan for People with a Learning Disabilities and supporting the development of accommodation for those with other disabilities and long term conditions including autism
- Contributing to the Council's emerging Ageing Well Strategy which will take into account the housing needs of older people.

On the third theme, **raising private rented housing standards** the actions we intend to undertake include:

- Reviewing existing licensing schemes for the private rented sector, in particular to explore options for an additional scheme for houses in multiple occupation and to analyse the need and feasibility of a wider selective licensing scheme.
- Developing enhanced support for landlords to improve the quality of housing and management in the Private Rented Sector, and promoting tenants' awareness of their rights
- Refreshing the Private Sector Housing Renewal Policy 2016 – 2018 to increase partnership working in line with the Better Care Fund approach and to address empty homes issues.

On the final theme, **effective partnership working with residents and stakeholders** the actions we intend to undertake include:

- Making a decision on whether to extend the council's management agreement with Tower Hamlets Homes
- Developing more effective working with registered providers operating in the borough delivering local priorities in order to ensure they remain local, independent and accountable to residents
- Continuing to work with Tower Hamlets housing stakeholders to ensure that residents' needs and aspirations are reflected in the work that they undertake; that residents have the opportunity to have their voices heard; and that up to date and accessible housing advice is given to residents impacted by the continuing roll out of welfare reform.

Tower Hamlets has a diverse population made up from people from a wide range of ethnic groups, a large proportion of younger people and a relatively low number of older people compared to the rest of London and Great Britain. There is substantial child poverty, extreme disparity in individual wealth, some poor health indicators and a significant number of residents have long term disabilities. The Strategy aims to take into consideration the needs of all these communities and we have carried out an overarching Equality Impact Assessment on the actions contained within the key themes. As individual policies and actions emerge, these will be further tested to ensure that none of our diverse communities are adversely impacted through the delivery of the Housing Strategy.

For a full list of the council's proposed actions see Section 10 of this document.

The rest of this document sets out in more detail on all of the 33 actions we propose to undertake to meet the objectives we have identified.

Index

- 1. Our vision for housing in the borough**
- 2. A snapshot of the housing evidence base**
- 3. Working with the Mayor of London against the wider national policy backdrop**
- 4. Delivery Theme 1 – More affordable housing, economic growth, and regeneration**
 - 4.1 Building new homes: local plan policy
 - 4.2 Outcomes from the Mayor of Tower Hamlets’ Housing Policy and Affordability Commission
 - 4.3 Funding new council homes, estate regeneration and other affordable housing
 - 4.4 Increasing and widening housing supply and choice
 - 4.5 Energy efficient, high quality, well designed affordable homes
 - 4.6 Modular Housing
 - 4.7 Self build and custom housing
 - 4.8 Regeneration and fostering a community spirit
- 5. Delivery Theme 2 - Meeting people’s housing needs**
 - 5.1 Common housing register allocation scheme
 - 5.2 Intermediate housing register
 - 5.3 Homelessness Strategy
 - 5.4 Tenancy Strategy, including fixed term tenancies
 - 5.5 Tackling overcrowding
 - 5.6 Older people’s housing needs
 - 5.7 Supported housing and use of temporary accommodation
 - 5.8 Housing for people with disabilities and long term health conditions, including autism
 - 5.9 Project 120 – meeting the needs of people who use wheelchairs
 - 5.10 Gypsies and travellers
 - 5.11 Young people and housing
 - 5.12 The Waterway Community
- 6. Delivery Theme 3 - Raising private rented housing standards**
 - 6.1 Landlord licensing scheme
 - 6.2 Closer working with private landlords including promoting accreditation
 - 6.3 Private sector housing renewal policy 2016/21
 - 6.4 Housing conditions: investigation and enforcement
 - 6.5 Promoting the rights of private tenants
 - 6.6 Other private sector housing issues
- 7. Delivery Theme 4 - Effective partnership working with residents and stakeholders**
 - 7.1 Tower Hamlets Homes and the council’s tenants and leaseholders
 - 7.2 Tower Hamlets Housing Forum – working with our registered provider partners
 - 7.3 East London Partnership and other local authorities
 - 7.4 Private sector development partners
 - 7.5 Third sector partners
 - 7.6 Helping to deliver healthier communities
 - 7.7. Working with our residents
- 8. Our approach to equalities**
- 9. Financial Overview – Resourcing the delivery of the housing strategy**

10. Action Plan & Glossary

Section 1 – Our vision for housing in the borough

1.1 In setting a vision for housing, we need to ensure it sits within a broader vision for the borough's residents and the many stakeholders we work with. These stakeholders include public and private employers, housing associations, advisory agencies, services providers and people who work in the borough but who don't live here. This broader vision is set out in the *Tower Hamlets Partnership Community Plan 2015*. The Community Plan themes focus on making the borough:

- A great place to live
- A fair and prosperous community
- A safe and cohesive community
- A healthy and supportive community.

1.2 These are the broad thematic headings that provide the direction for what the council does and this housing strategy seeks to fit strategically with it. Residents' comments in the Community Plan under the heading *Housing for all* are as follows:

Residents are worried about the affordability of homes being developed in the borough, with many households on low wages feeling that they are beyond the reach of most people who want to live in Tower Hamlets. Suitable housing options that meet the needs of people with learning disabilities, mobility issues or mental health problems are specific challenges.

Residents want the partnership to secure the continued existence of mixed communities through supporting a range of affordable housing choices that reflect the people who live and aspire to reside in the borough. They also want less development of high value housing which promotes gentrification and creates a divide, leaving certain communities behind.

Residents also highlighted the importance of issues such as drugs misuse and anti-social behaviour which can blight individual and community life on estates, and emphasised how good housing and good living conditions are fundamental to wellbeing and cohesion.

Source: *Tower Hamlets Partnership Community Plan 2015* (Page 21)

1.3 Consultation Feedback

The first stage consultation was both successful and informative with a total of 15 public engagements, 10 internal and partner meetings including an all Member seminar and over 400 surveys completed by the public. Several strong messages emerged including:

- Major concern over the shortage of affordable housing and concern that future rents set by the Council and housing associations will force people out of the borough
- Lack of housing choices for young people brought up, living and working in the borough meaning many on average incomes will be forced to stay at home, move out or pay high rents in poor quality private rented housing
- Support for the development of 'living rent' homes for this group at sub market rent levels in new build developments and on council estates

- Concern over population growth, impact on the environment and green spaces and whether vital infrastructure including schools, health centres and transport links will be developed to match the needs of the population
- General support for the Council's approach to meeting housing need and homelessness through priority and advice.

1.4 A clear majority of residents are in broad agreement with the direction set out in the Stage 1 options and challenges paper, supporting the development of truly affordable housing that meets the needs of a range of people in the borough in need on low to median incomes. It is also clear that residents are dissatisfied with many aspects of private rented sector housing and want the Council to intervene where possible to improve the quality of the sector in the borough. From the Stage 1 options paper, we developed a more detailed strategy which we consulted further on. The second consultation process included a residents' conference addressed by the Mayor of Tower Hamlets. At that event, we were told that residents were concerned about:

- the lack of new housing that is genuinely affordable
- council housing under attack from central government
- tenants in the private sector having to move regularly
- housing associations that were merging and whether this might lead to a deterioration in local service delivery and accountability
- estates owned by housing associations were being proposed for redevelopment without residents' support
- the growth of private rented housing and the activities of letting and managing agents
- anti-social behaviour by occupiers of homes sold under the right to buy
- the need for more but focused licensing of private landlords
- the need for residents to better informed about the likely impact of the Housing and Planning Act 2016

1.5 The council's response

We've sought to take account of these views in this document. They reflect the wide impact that housing has on people's lives. What we seek to do in this document is to set out how we think we can meet them as far as we can, within the constraints of the resources we have at our disposal and the environment in which we operate. Some of these services we have to provide, so in some instances it's about how we provide the services not whether we provide them. As part of the strategy development process, we've taken time to talk to other service providers to ensure that there is connectivity and coherence between the various strategies and plans that the council is responsible for or choose to adopt. Some of the issues flagged to us are as follows:

- The council's *Children Looked After Strategy 2015-18* identifies the council as the Corporate Parent for children who can't live at home, including where teenage pregnancies occur. The key contribution that housing can make is assisting with finding a secure, settled home for care leavers when they become adults providing a platform for employment opportunities.
- Meeting the needs of troubled families is also a corporate priority as the fall-out from a family struggling to sustain itself can have major social and financial impacts across a range of areas – health, housing, education – and therefore early, proactive interventions will be necessary to mitigate any negative impacts that emerge.

- Pupil Place Planning is about how the council's statutory duty to provide and plan for school places is managed. With the high population growth expected in the borough this is a critical issue. Clearly housing plays an important role here as the number of bedroom spaces in a given development, particularly with the affordable housing, will strongly influence what local demand there will be for school places. So there's a strong need for planners, housing and education stakeholders to work collegiately to ensure that the best outcomes for the borough's residents are sought.
- Anti-social behaviour, crime and the impacts of the fear of crime has a profound impact on people's well-being, particularly older members of the community and we need to make sure that individual agencies' approaches coalesce to maximum effect.
- The housing needs of people with learning difficulties and autism are currently not being met, so the council is committed to developing and implementing an accommodation plan to address this. This will involve council officers working corporately with specialist agencies to develop sustainable housing options for this need group.

1.6 Next Steps

In terms of the physical development of the borough, the key document to take account of is the Local Plan, the Council's strategic planning development document. The Local Plan sets out where new homes, offices, schools and transport will be located and what policies will guide their development. A new version of this document is currently in draft form and is referred to below in section 4. It's an important document because it sets out in broad terms where the majority of new homes will be built in the borough up to 2025 and what kind of homes they should be. The Local Plan will need to be in general conformity with the Mayor of London's London Plan and will eventually need to be signed off by the Government. It is important that the council is mindful of competing regional and national priorities and policies when developing its own housing plans.

- 1.7 In conclusion, when considering the development and implementation of the housing strategy, we should be ambitious in what we seek to achieve, generating added value wherever possible, but realistic also given the financial restraints. In that vein, a workplan will be developed that is resourced and realistic. For the purposes of this document, our housing vision for the borough is as follows:

Tower Hamlets Council wants to ensure that:

- there are housing choices for all sections of our diverse community
- the homes people live in are in a decent condition, warm, and weathertight
- the most vulnerable people's housing needs are met in a fair and inclusive way
- all homes are in safe, prosperous and thriving neighbourhoods
- that our response to housing issues is measured and achieves value for money

To deliver this vision, we have broken down our approach into four broad delivery themes, identifying the challenges and setting out how we're going to meet them. The themes are:

- Delivering affordable housing, economic growth, and regeneration
- Meeting people's housing needs
- Raising private rented housing standards
- Effective partnership working with residents and stakeholders.

1.8 In meeting these challenges, the council needs to have in place effective partnership working with residents and stakeholders including the Greater London Authority, housing associations, developers and the voluntary sector to help deliver them. We may also need to consider different commissioning processes to achieve what we want, using innovative approaches that private sector or social enterprises can help deliver the outcomes we are seeking. This is in effect a cross cutting theme to all our work, because if we don't work in partnership, we won't successfully meet the challenges that we have identified.

Section 2 - A snapshot of the housing evidence base

Headlines

- More than 19,000 households on the housing register.
- More than 9,000 people in substantial housing need.
- 44% of households in income poverty.
- Population of Tower Hamlets to increase by 26% by 2026.
- The average cost of a property in LBTH is more than 14 times (£450,000) what a typical essential worker could earn in wages (£35,000).

Housing Register

- 53.75 % of households are in priority categories 1 and 2.
- 7,078 of these households are over-crowded.
- 52.3% of all households on the register are Bangladeshi families.
- 506 residents on the register are under-occupying by two rooms or more.
- There are over 232 households with a need for wheelchair adapted property in category 1a and 1b.

Homelessness

- There are nearly 2,000 households in temporary accommodation of which over 1,000 are housed outside the borough.
- In 2015/16 the Housing Options Team made 656 homeless decisions, this is 15% down on decisions made in 2014/15. Of the 656 homeless decisions made, 522 were accepted as homeless
- In 2015/16, 78 households were intentionally homeless and in priority need, for the same period that 522 households were unintentionally homeless and in priority need – this is a reduction of 27% compared to 2008/09
- During 2014/15 the Housing Options Team prevented over 672 households becoming homeless
- Recorded rough sleeping has increased from 4 in 2013; 6 in 2014; and 12 in 2015

Lettings

- Nearly 8,500 homes have been let in Tower Hamlets over the past four years.
- 58% of all homes let through choice during 2015-16 were let to an over-crowded household.

Housing Stock

- The housing stock in Tower Hamlets has increased by 27% since 2003; there are now almost 121,000 homes in the Borough.
- In 1986 around 82% of all homes in Tower Hamlets were Council/ GLC owned, today only 10.9% of the stock is Council owned and for the first time in the Borough's history, less than half the housing stock is social housing.
- The private rented sector is now the fastest growing housing sector in the Borough; it has risen from 18.3% of the stock in 2003 to around 39% of the stock in 2014.
- There are close to 9,000 ex-right to buy leasehold properties managed by Tower Hamlets Homes in the Borough. Overall, there are more than 15,000 leasehold properties formerly owned by the Council.
- There are an estimated 2,800 intermediate housing units in the Borough.
- The Borough is growing by over 3,000 homes per year, making Tower Hamlets the quickest growing Borough in London. Consequently the borough qualifies for the highest level of New Homes Bonus in the country.

- Tower Hamlets over the 2012-15 period has delivered the most affordable homes in an English local authority area with 2,560 affordable homes, higher than any other borough in London and 25% more than England's second city, Birmingham which delivered 1,920 affordable homes.

Private sector Stock

- As of 2011, Tower Hamlets had approximately 67,209 homes in the private sector, of which 62% are in the private rented sector.
- Private rented is now the largest tenure in the borough with 39% of the housing stock. The London average is 25%.
- Borough median rents per week in 2016 were as follows: Studio - £290; 1 bedroom - £334; 2 bedroom - £420; 3 bedroom - £522; 4 bedroom - £667.
- Around 16% of properties are over-crowded while 39% are under occupying.
- Approximately half the leasehold stock sold under right to buy is now privately rented.
- Approximately 37% of the private stock was built post 1990.
- 19% of the borough's stock failed the decent homes standard in 2011 compared with 35.8% nationally
- Approximately 350 Houses in Multiple Occupation in the borough are large enough to require mandatory licensing; all but around 65 of these have a current licence
- 30% of all category one hazards are in HMOs.

Future Housing Delivery

- Tower Hamlets has an annual housing target of 3,931 set up the Greater London authority and is expected to accommodate an additional 39,310 homes by 2025

Demographics and Housing Need:

- Ethnic minority households in the Borough are disproportionately affected by homelessness. In 2015/16 80% of households accepted as homeless were from ethnic minority groups. However, ethnic minority groups account for 69% of the Borough's population.
- Ethnic minority households account for over 70% of households on the Housing List, and the majority of those that are overcrowded.
- Ethnic minority households are, on average, larger and more likely to be overcrowded.
- Bangladeshi households are, more likely to be homeless than any other ethnic group in the Borough. Though only accounting for 30% of the population, 59% of households accepted as homeless in 2015/16 are Bangladeshi.
- Black households in the Borough are also disproportionately affected by homelessness when compared to the population as a whole. Black households make up 16% of households accepted as homeless, but represent 7% of the Borough's population.
- The largest age groups accepted as homeless are the 16-24 and 25-44 age groups (with the latter being the largest), though the numbers of acceptances from these groups have dropped significantly – again a reflection of overall reductions in homeless acceptances.
- Acceptances for the 25-44 age group have seen a steady decrease. Homeless acceptances for this age group went from 454 in 2008/9 to 349 in 2015/16, a 33% reduction.
- The number of homelessness acceptances made as a result of a member of the household having a physical or mental disability has decreased dramatically between 2008/9 from 97 households to 18 households in 2015/6. The percentage of acceptances as a result of vulnerability due to a disability is 3.4%. However, this is the third largest priority need group, behind those with dependent children and pregnant women.
- The percentage of residents 65 and over in the borough is 6% compared to London's 11%.

¹ All data has been taken from the 2016 LBTH Housing Evidence Base

Section 3 - Working with the Mayor of London against the wider national policy backdrop

3.1 Mayor of London

Sadiq Khan was elected as the new Mayor of London on 5th May 2016. Meeting housing need is one of his key objectives and the Council will work closely with him over the next four years. Set out below are his election commitments and the Council has considered these in developing this Housing Strategy:

- **Homes for Londoners** - The Mayor will set up a new team at City Hall dedicated to fast-tracking the building of genuinely affordable homes to rent and buy.
- **Putting Londoners first** - The Mayor will set a target for 50 per cent of all new homes in London to be genuinely affordable, and use mayoral powers and land to stop 'buy-to-leave' and to give 'first dibs' to first-time buyers and local tenants. He will aim to end the practice of thousands of homes in new developments being sold off-plan to overseas investors each year.
- **More investment in housing** - The Mayor will support housing associations in their plans to ensure a significant increase in housing delivery.
- **Land for homes** - The Mayor will bring forward more land owned by public bodies like Transport for London and use the Mayor's new homes team to develop that land. This will enable more homes to be built where they are needed, rather than where developers think they can make the most money.
- **London Living Rent** - The Mayor will create a new form of affordable housing, with rent based on a third of median local income, not market rates. A new form of tenure, more affordable and giving Londoners the chance to save for a deposit.
- **Action for private renters** - The Mayor will establish a London-wide not-for-profit lettings agency to promote longer-term, stable tenancies for responsible tenants and good landlords across London.
- **Action on Landlords** - The Mayor will work with boroughs to set up landlord licensing schemes – naming and shaming bad landlords and promoting good ones.

In the meantime, the Council needs ensure that its housing strategy is in general conformity with the former Mayor of London's adopted Housing Strategy (October 2014). This focused on meeting the needs of London's growing population. The Strategy aims to almost double housebuilding to at least 42,000 homes a year for the next twenty years. This challenge formed the core ambition of the former Mayor's Housing Strategy – formally adopted in October 2014.

The strategy also aimed to better reward those who work hard to make this city a success by:

- massively increasing opportunities for home ownership.
- improving the private rented sector.
- ensuring working Londoners have more priority for affordable homes to rent

At the same time, the strategy reiterates the previous Mayor's long-standing commitment to address homelessness, overcrowding and rough sleeping.

3.2 London Living Rent & Homes for Londoners

The new Mayor of London's housing commitments are ambitious and some of the building blocks are already being put in place.

The council supports the broad approach and specific commitments the new Mayor of London has made, but we appreciate that it will take some time to implement new strategies and policies to make the needed difference. At the time of writing the council understands that the Mayor of London intends to consult on a new Affordable Housing Supplementary Guidance document that should help maximise affordable housing delivery through the planning process. This is likely to be an early step of a wider process to refresh the London Housing Strategy and the key planning document that sits behind it, the London Plan.

The council is likely to support any effort on the part of the Mayor of London to maximise affordable housing delivery and the council is already using its own resources to help do so. But we need to ensure that the interests of the borough's residents are at the fore when discussing and negotiating any changes that are proposed. Our concern is that there will be insufficient funds available for affordable rented housing, but we recognise that government policy is mainly responsible for this. It may well be that the only funds available to deliver new homes for affordable rented purposes will be from the council or through S106 projects. To help increase the amount of affordable housing developed, the council has decided to use its own money to build its own new homes on council-owned land, described in more detail in Section 4.3 of this document.

In September 2016, the Mayor of London set out more detail on his approach to the London Living Rent intermediate housing product. This product will be aimed at working households earning between £35,000 and £45,000. Rents will be based on a third of average (median) local gross household incomes. Assured Tenancies of up to five years with annual inflation-linked rent increases will be adopted, although landlords will be able to adopt their own approach without recourse to Mayoral funding support. The Mayor of London has indicated that boroughs will be able to set their own local priority frameworks (effectively local allocations policies) which will be subject to Mayoral approval. It is highly likely that a proportion of allocations will be allocated on a Pan London basis, so some negotiation will be needed as to what proportion will be acceptable, appreciating that some residents from Tower Hamlets will want to apply for homes in other boroughs. Such an approach will need to be factored in to the council's approach to its proposed intermediate housing register for working households on low to medium incomes (See Section 5.2).

More detail will be published by the Mayor of London later in 2016 in an investment prospectus and draft affordable housing supplementary planning guidance (SPG).

3.3 Wider national policy context

In May 2016, the Queen gave royal assent to the Housing and Planning Bill which will have a significant impact on our strategy. The council was opposed to many aspects of the Bill prior to it becoming an Act of Parliament, as we think it had very little positive to contribute to meeting affordable housing need in the country and in Tower

Hamlets itself. However it is now legislation that we need to take account of and implement when and where necessary.

The Act includes requirements to:

- Charge higher Pay to Stay rents to council tenants on household incomes of over £40,000 a year. On the 21st November it was announced that this will now be discretionary for Councils to introduce for their tenants.
- Require council planners to allow a new 'affordable' home product called Starter Homes at 20% below market cost but for sale at no more than £450,000 which will replace other forms of affordable housing.
- Make fixed term tenancies mandatory for new council tenants.
- Require Councils to consider selling higher value council homes to fund the extended right to buy for housing association tenants.

This Act and associated interventions detailed in the Government's 2015 Spending Review, such as the four year 1% rent reductions and wider welfare reform changes (including the rolling out of the Universal Credit and reduction in the Benefit Cap to £23,000 per year) will present major challenges to all stakeholders in the borough – residents, housing associations, advisory agencies and the council itself. Resources for building new affordable housing through the Greater London Authority's investment programme are likely to be limited, with the government's focus on affordable home ownership rather than affordable or social rented housing.

3.4 The council's response

In considering our response, we're particularly concerned:

- For our residents, the continuing roll-out of Universal Credit (which combines six existing benefits into one), the cap of £23,000 benefit entitlement to be introduced Autumn 2016 for non-working households, and the reduction in benefits to disabled people. We're also concerned about government proposals to limit benefit entitlement to the local housing allowance for vulnerable people in supported housing and to reduce housing benefits for single people under 35 in social rented housing to the shared room local housing allowance.
- For our council stock, the requirement by the government to fund the extension of the right to buy for housing association tenants (nationally, not just in Tower Hamlets) using the sale proceeds of much needed council homes that become empty.
- For the investment plans of social landlords, including Tower Hamlets Homes, following the reduction of social rents that can be charged for the four years starting in 2016/17 which will impact organisations' ability to invest in their stock and build new affordable homes.
- For the development of new affordable homes for rent, given the government's focus on home ownership, including Starter Homes which are likely to be priced at up to £450,000, which the council doesn't consider to be affordable to local people which will be available to any eligible person – principally first time buyers under the age of 40 in the United Kingdom – on a first come first serve basis.

This housing strategy is about how we intend to meet these new challenges and those that we continue to face. Our response will involve the council using any resources at its disposal to bring forward the development of new affordable housing

and ensure that those who live in it presently are able to continue to afford to living in their home.

This will mean increasingly working on the basis of what resources the council and its partners, particularly local housing associations, have to work with. There can't be any realistic expectation that there will be a future windfall of government grant to fund what we know we need, underpinned by the evidence set out in the snapshot of housing need.

3.5 Managing the impact of gentrification

One recurring theme that has emerged from the initial consultation process is around a feeling amongst longstanding residents of disconnection. The trend of what many call gentrification is making many people feel disconnected from the places in which they live. The vast resources that have been channelled into the borough over last 30 or so years has led to a vastly improved transport network; places that have been regenerated and transformed beyond recognition; and the emergence of Canary Wharf as a financial capital to complement the City of London. But the change has arguably not benefitted the neediest and the idea of a 'trickle down' regeneration effect where private sector investment leads to positive social outcomes has arguably had only a marginal positive effect. And we have a situation whereby many local people on low to medium incomes seeing further development and regeneration not as something to be welcomed, but something that changes things for the worse.

3.6 Managing expectations in a fast changing environment

The reality is that we will need to find a way of finding the right balance to take forward the existing model of private housing development funding affordable housing that delivers affordable housing that people both need and want.

These are some of the challenges that the council has to wrestle with when considering residents' needs and aspirations which continue to grow, but the resources at our disposal to meet them are diminishing.

Section 4 – Delivery Theme 1 - More affordable housing, economic growth and regeneration

Why this is important

The Council believes that the provision of suitable housing for people that is decent, warm and weathertight is a fundamental right. Tower Hamlets is at the forefront, regularly delivering the highest amount of affordable housing nationally for what is one of the geographically smallest boroughs in the country. Twinned with this is meeting the parallel challenges of delivering economic growth and regeneration that benefits local people. For ongoing investment to be successful and sustainable, the benefits need to go beyond the bricks and mortar of housing, essential though the housing is. A new facet to the challenge is sustaining delivery in what is a difficult environment with limited public funding available for new affordable rented housing. The prospects for the residential housing market currently look uncertain and we need to be flexible about how we approach the housing delivery work that we have been successful in achieving in the past.

Population growth, meeting housing need locally and the requirement to contribute to meeting housing demand across London all point to the continued development of thousands of new homes in the Borough over the next ten years.

This section sets out the strategy in terms of number of homes, the broad location, and the type and cost of affordable accommodation in the borough which we aim to develop. We also set out how we want to see economic growth and regeneration calibrated to help meet residents' broader aspirations. Much of the economic growth and regeneration in the borough is housing-led, so we need to ensure that this kind of investment gives us more than new affordable housing, important though this is.

4.1 Building new homes: local plan policy

During December 2015 to February 2016 the Council undertook the first stage of consultation on its new Local Plan which is the key planning document for the borough. The Plan should make clear what development, e.g., homes, offices, schools, is intended to happen over a certain period; where and when this development will occur; and how it will be delivered

Our Borough, Our Plan – A new Local Plan First Steps (Dec 2015)

Responses to the consultation document have been received and considered. A further, more developed version of the Draft Local Plan will be consulted on in late autumn 2016. The aim is to adopt the final Local Plan document, subject to secretary of state approval, by early 2018.

The December 2015 document stated that:

Tower Hamlets is expected to contribute a minimum of 39,310 new homes, approximately 10 per cent of the London housing target, by 2025. The borough's ability to supply land for housing in these quantities is becoming increasingly limited as a significant proportion of our available sites have already been developed. Land also needs to be secured to support the delivery of new infrastructure, such as schools, open spaces, health centres and transport links to create sustainable communities – Our Borough, Our Plan – A new Local Plan First Steps (Dec 2015)

The borough is required by national policy to maximise housing delivery and the target we have is one set by the Greater London Authority (GLA) and detailed in the London Mayor's London Plan. The borough currently has around 121,000 homes, so adding a further 39,310 by 2025 is going to have a major impact and add additional pressures on the current social, economic, environmental and transport infrastructure. This means that planning applications for new homes need to include proposals (or funding) for additional infrastructure to cope with the new communities that are created. In addition, there is an increased call on the services that the council provides which need to be planned for.

London Plan and the National Planning Policy Framework

What we set out in the final housing strategy will inform the housing policies in the Local Plan and help implement them, The Local Plan document and associated guidance documents are the key local documents referred to when considering planning decisions. The Local Plan must be in general conformity with the London Plan and also the Government's National Planning Policy Framework (NPPF). The Local document needs to be supported by a number of documents, which include the Strategic Housing Market Assessment (SHMA) and the Strategic Housing Land Availability Assessment (SHLAA). The SHMA assesses the future amount of affordable and market housing need in the borough and the SHLAA assesses where the new homes to meet that need can be located.

Until the Plan is adopted the draft planning documents will be considered as emerging policy but have no material weight in decision making. The adopted housing strategy influences current and emerging planning policy but will not determine it.

Tower Hamlets' affordable housing target

At present, the council has a strategic target of affordable housing of 50% from all new housing developments. Between 35% and 50% affordable housing will be sought from sites of over 10 homes. Of the affordable homes developed, 70% should be below market rented purposes and the remaining 30% for intermediate purposes (see glossary for more detailed definitions). For clarity, the GLA London Living Rent accommodation should be treated as intermediate housing and private rented accommodation should be considered market housing.

Due to national and regional planning policy and financial viability arguments made by developers, supported by the government's NPPF position on sustainable development, it is a challenge to deliver affordable housing within that range. Due to the significant proportion of housing that is proposed by private developers, which historically has yielded a large amount of affordable housing through what are called s106 agreements, the council will need to continue maximising affordable housing from this source.

Housing and Planning Act 2016 and Starter Homes

This will prove increasingly difficult with the policy changes the government has brought in with the Housing and Planning Act 2016, particularly on Starter Homes, are expected to be set by the government at a cost of no more than 80% of local market values and no greater than £450,000 in London. Other elements of the Act include the introduction of higher rents for council tenants on gross incomes of more than £40,000; introduction of fixed term council tenancies; sale of higher value council homes which are intended to fund the extension of the right to buy for housing association tenants. On the right to buy, the council is concerned that the government's intention that each home sold is replaced by at least one new home will not be realised in the borough given the high cost of development. In addition, many

housing association homes were built with 'in perpetuity' legal agreement clauses meaning there will be difficulties in allowing these homes to be sold. The council will aim to continue to maintain the amount of affordable housing in the borough in all scenarios and will closely monitor the impact of housing association as well as Council sales through the Right to Buy programmes.

Widening housing choice

A common perception of housing choice in Inner London areas is one where you have to be very wealthy or very poor to be able to access accommodation. Even what many of our residents would consider a high income is not necessarily sufficient to enter the low end of the home ownership market. An outcome sought from this strategy is recreating some of the housing choices which enabled the borough to attract a wide range of people that contributed to public services, e.g., essential workers, but also people who contributed to the borough's diversity and cultural life. We need to look at what we can do to re-create those choices in a lasting way and understand what outcomes they can generate.

Transport infrastructure as a driver for housing development

The borough has hosted significant housing delivery in the past decades for a mix of reasons: the redevelopment of docklands, its proximity to the City of London and more recently the Olympic Park (now the Queen Elizabeth Park); major local authority led estate regeneration schemes, e.g., Ocean Estate and Blackwall Reach; and now with the more recent Overground and Dockland Light Railway upgrades, the transport infrastructure is soon to benefit from Crossrail, now the Elizabeth line, which will have 2 stations in the borough at Whitechapel and Canary Wharf with the line opening in stages from late 2018 onwards, providing the transport infrastructure for higher density housing development.

As set out in *Our Borough, Our Plan – A new Local Plan First Steps (Dec 2015)* land available to build new homes is becoming increasingly limited and public money for infrastructure investment limited, a balance needs to be struck between housing development and educational, health and other essential infrastructure needed to create great places to live, one of our community plan themes. However, significant housing development is likely to be a continuing theme in Tower Hamlets with many of the new homes expected already in construction.

Mayor of London's Opportunity Areas

The significant housing delivery the borough has hosted is likely to continue for the next decade, mainly but not exclusively in the areas below identified by the Mayor of London for housing and employment growth:

- Area 1 - City Fringe / Tech City (including Whitechapel) where a minimum of 15,000 homes can be delivered.
- Area 2 - Isle of Dogs and South Poplar where a minimum of 10,000 homes can be delivered.
- Area 3 – Lower Lea Valley which the Tower Hamlets element includes the Poplar Riverside Housing Zone where a minimum of 9,000 homes can be delivered.

Each of these Opportunity Areas will generate a significant number of new jobs. Through identifying specific areas for major growth, the Council can take a more co-ordinated approach to developing an area in a holistic manner, ensuring that other essential

infrastructure including schools, leisure, health facilities, workspace and appropriate transport links can be developed in order to meet the needs of the growth in population.

The council is already working with the Mayor of London to maximise affordable housing delivery in the Poplar Riverside area through a Housing Zone. The Mayor of Tower Hamlets is also working in partnership with the GLA and Transport for London (TfL) on the GLA-led Isle of Dogs and South Poplar Opportunity Area Planning Framework to realise growth potential that meets both local and strategic needs.

In addition, the council will need to look at other ways of ensuring affordable housing delivery can be accelerated, possibly through the adoption of an alternative delivery mechanisms and initiatives we reference in section 4 of this document.

Whilst the majority of future housing will be built in the three areas identified above, there will continue to be new development in other areas of the borough, particularly where the council has the opportunity to build on its own land.

Action 1: Maximise affordable housing building from all sources of housing supply, with a focus on the borough's three opportunity areas

4.2 Outcomes from the Mayor of Tower Hamlets Housing Policy and Affordability Commission

Mayor John Biggs established a Mayoral Housing Affordability Commission to investigate the delivery of actual affordable housing. The Mayor appointed an external expert panel who met three times between December 2015 and February 2016.

The Mayor in Cabinet considered the recommendations of the Affordability Commission at a meeting on the 10th May 2016 and agreed to prioritise the following areas of work:

- deliver 100% rented housing on council owned sites combining social target rents and homes at a 'living rent' (set at a proportion of median incomes at or below Local Housing Allowance levels) that is affordable without recourse to benefits for households with median incomes. These would cross-subsidise the social target rented homes.
- investigate letting the higher rent homes through a separate waiting list and potentially developed by a council sponsored housing company.
- explore the option to reduce Borough Framework rents on S106 sites (where private developers are required to deliver affordable housing) to more affordable levels including social target rents taking into account impact on viability and possible reduction in overall affordable housing units.
- plan for emerging Government policy, in particular the proposed requirement to deliver 20% Starter Homes on schemes over 10 units as part of the affordable housing offer.
- review its policy regarding commuted sums (i.e., money from private developers instead of affordable housing) for affordable housing elsewhere with reference to the broader objectives of increasing affordable housing development and supporting estate regeneration

Intermediate Housing

Intermediate housing is for people who need affordable housing, but would receive low priority on the common housing register. It provides a much needed source of accommodation for people who want to live and work in the borough particularly essential workers, such as nurses, teachers, teaching assistants and social workers. For many years it has provided a supply of accommodation for people who cannot afford homes on the open market.

A traditional form of affordable home ownership in the borough has been through the provision of shared ownership homes built by housing associations. Typically an applicant can buy (usually with a mortgage) a minimum of 25% of the open market value of a home and rent (and pay service charges) for the remainder. Because of high house prices in the borough, even this model is becoming increasingly unaffordable for people on average incomes. Other forms of intermediate housing include sub market rented housing which is below private market rents but above social rents and community land trust models of affordable housing such as the scheme being developed on the St Clements Hospital Site.

The council will need to review how it approaches the delivery of intermediate housing with the advent of Starter Homes and the increasingly unaffordable cost of shared ownership housing. The council with its partners including the GLA will continue to look at alternative models of intermediate housing that enable people on low to medium incomes to live in the borough. Increasing the amount of genuinely affordable homes for ownership for local people is an important part of the council's future housing approach.

With the advent of the Mayor of London's London Living Rent product, the council will need to work with the Greater London Authority to ensure there is clarity for home seeking applicants on qualifying and eligibility rules with clear explanations of the various intermediate housing products that are available and that are emerging. This will also require a clear read-across between the Mayor of London's official First Steps intermediate housing programme which sets what affordable home ownership products are available in the capital and what rules are for accessing them.

Actions 2:

- Use council-owned sites to deliver 100% rented housing combining social target rents and homes at a Tower Hamlets 'living rent'.
- Use council-owned sites to develop higher rent homes let to applicants from a separate waiting list and potentially developed by a council owned Housing Company or a Housing Company in which the Council retains an interest.
- Reduce government defined Affordable Rents to lower levels including social target rents taking into account the possible reduction in overall affordable homes for rent.
- Create a new Tower Hamlets Living Rent product which is based on a third of gross median household local incomes
- Plan for emerging Government policy, in particular the proposed requirement to deliver 20% Starter Homes on schemes over 10 units as part of the affordable housing offer.
- Review its policy regarding commuted sums for affordable housing, with the aim of:
 - Creating mixed and sustainable communities
 - Considering the overall output of affordable housing

- Making best use of Council owned land/assets
- Develop clear affordable housing policy for market sale, for discounted market sale including Starter Homes and shared equity schemes with reference to evidence available regarding take up of subsidised home ownership schemes.
- Explore long term financial investment from institutions for an intermediate rent product for households with average/median incomes.

4.3 Funding new council homes, estate regeneration and other affordable housing

The council continues to be a major landowner in the borough through its ownership of homes and council land managed by Tower Hamlets Homes. In recent years it has been undertaking a council house building programme part funded by right to buy receipts. However, the government's policy of reducing social rents by 1% a year for four years, means that previous assumptions on future revenue for asset management of council housing and building new homes has had to be revised.

That said the council is committed to supporting the delivery of:

- more council housing at social rent and Tower Hamlets Living Rent
- more housing association affordable homes to rent and buy
- the regeneration of our estates where appropriate
- Investigating building and/or acquiring new homes, possibly outside the borough Intermediate housing, i.e., homes for working households, including shared accommodation in certain circumstances

The council is committed to the delivery during 2014-18 of 5,500 affordable homes in total by all affordable housing providers, of which 1,000 will be by the council for rent. The majority of these 1,000 homes will be built on council-owned vacant land.

Council Housing New Build sites

As of October 2016, the council had a significant housing development portfolio of its own and the table below sets out the new build programme currently in progress:

Scheme	Units	Comment
Poplar Baths/Dame Colet House	100	Completed
Bradwell Street	12	Completed
Watts Grove	148	Onsite
Jubilee Street	24	At Planning Stage
Baroness Road	20	
Locksley Estate (Site A & D)	54	
Hereford Street	38	
Tent Street	72	
Arnold Road	62	

Action 3: Complete a full capacity study of Council owned land site (within the Housing Revenue Account and the General Fund) to identify further opportunities and funding options.

4.4 Increasing and widening housing supply and choice

The housing challenges the council and its residents currently face mean that we need to look at options that even a few years ago might have been considered unattractive. Some initiatives may look as if we're competing with our partners, but in the main the rationale for our approach is simple: if we're going to use our own resources to fund new initiatives, we need to retain control of the resources used. This doesn't mean we won't use services that some partners provide, e.g., housing associations, as they are more experienced both at mixing private and public money to deliver social outcomes and operating in the market place. Initiatives we are considering include the following:

- New housing companies

Like many other Local Authorities, the council is considering setting up new companies to deliver housing on its behalf. This could include homes both inside and outside the borough and for both rent (both permanent and temporary housing) and sale. The advantage of this is that it would operate under different financial rules and possibly enable more homes to be built. The Council will bring forward plans for the companies later this year.

- Co living Model of Housing

This involves using accommodation in a more intensive way, where residents have sole use of a room but share facilities such as kitchens, bathrooms and leisure space. This is in essence a variation on the principle of shared living which is for many the first type of accommodation that is used after leaving home. Because of the housing crisis, increasingly more and more households are living this way and are not able to move on to home ownership. This housing model can suit a certain lifestyle; in temporary work in the borough, for a certain period of time, but is not intended to be a permanent form of accommodation. Such schemes are likely to work in high density locations and would need to be car free and may be targeted at certain groups such as single working people. The proposed council sponsored housing company may have a role to play in delivering this kind of accommodation

Council owned temporary accommodation

The council has been successful at both preventing homelessness and meeting homeless households' needs. It will always seek to avoid using bed and breakfast accommodation, but sometimes this is unavoidable, particularly when a homeless applicant presents themselves to the council and needs a roof over their heads urgently. Rather than spending money on high cost bed and breakfast accommodation, the council is considering buying or developing its own accommodation to meet emergency housing needs. Furthermore the Council is also considering options to develop or convert existing accommodation for use as temporary accommodation to reduce its reliance on the private rented sector. This is due to the increasing difficulty of procuring affordable temporary private sector housing and the cost to the Council of subsidising the high rents, in light of the Government's decision to freeze temporary accommodation subsidy since 2011. We're seeking to counter-balance the temporary loss of this permanent social housing by continuing the programme of buying back ex-council homes sold under the right to buy.

- Modular Housing

The council will also consider developing the use of portable modular housing which can be used for shorter term lettings, primarily for homeless families awaiting permanent accommodation. This type of housing can be set up quickly on empty sites which may be awaiting development and be reused as sites change use, or alternatively to provide such accommodation on a long-term basis to help meet the current and future needs of homeless households and where appropriate permanent housing in the Borough. The Council has been working in conjunction with the East London Housing Partnership on researching the different types of modular housing now available on the market and will develop its approach to this type of housing during the period this housing strategy covers.

Actions 4:

Set up housing companies to deliver new homes both inside and outside the borough.

Explore the merits of the developing a co living model of housing for working people.

Explore the merits of the council buying or developing its own accommodation to meet emergency and temporary housing needs for homeless households.

Explore the use of modular housing to assist in meeting homeless and mainstream housing need across the Borough.

4.5 Energy efficient, high quality, well designed affordable homes

As much as the council wants to see more affordable homes, it wants them also to be sustainable also. This means they should be energy efficient, reducing the carbon footprint of homes that used to be built. But also ensuring they are homes that people want to stay in, by ensuring there is accompany social and community infrastructure including sufficient play and informal recreation space.

New residential developments should be designed to achieve high energy efficiency targets and be near-zero energy buildings. Such buildings are designed to reduce regulated energy use for space heating, hot water, cooling, ventilation and fixed lighting but does not relate to non-regulated energy use, e.g., plug in appliances and cookers. Such developments are required to follow the energy hierarchy of Be Lean, Be Clean and Be Green to reduce energy demand. Through reducing energy demand the new properties will have low running costs for future residents to have a low carbon footprint and also reduce fuel poverty. The proposals for near-zero energy buildings will see a minimum 45% reduction in carbon dioxide emissions on-site, with the remaining regulated carbon dioxide emissions to 100% to be off-set through the Councils adopted carbon offsetting programme.

For existing residential accommodation, poor energy efficiency of a home is a contributor to fuel poverty and effects the most vulnerable households which in turn can exacerbate health issues of the households. Through carbon offsetting the Council will deliver residential energy improvement projects, thereby reducing energy use for existing residents to alleviate fuel poverty and reduce Borough wide carbon emissions. The council is also aware that the Mayor of London has made improving air quality in the capital a priority and we need to be mindful of where homes are built; which need groups will be living in them; and how we can mitigate the negative air quality impacts to homes that are located near busy roads.

10% of homes should be designed to meet Part M Category 3 wheelchair adaptable housing, and, for units where future tenants have been identified and their needs assessed by the Local Authority, these units should be built to the full wheelchair accessible standard (Part M Category 3 (2b)). Other homes should be built to meet Part M Category 2, unless the introduction of a lift would adversely affect service charges to such an extent as to prevent the homes being affordable.

The council will seek to build homes that deliver:

- Meet the standards set out in the Mayor of London's *Housing Design Guide* and his *Affordable Housing Supplementary Planning Guidance (March 2016)*
- energy efficient standards which helps both reduce fuel poverty and carbon emissions
- acceptable space standards meeting *DCLG Technical housing standards – nationally described space standard (March 2015)* and ideally exceeding them
- bedroom mixes that meet people's needs
- areas where there is sufficient play and informal recreation space
- wheelchair accessible standards as set out above and Lifetime Homes Standards (?)
- wider community infrastructure, for example, GP Surgeries, schools, greenspace, local shops, which help create sustainable communities envisaged in our Community Plan, which can be supported by planning obligation resources, including from the Community Infrastructure Levy (CIL)

Actions 5:

Ensure new developments are built to near zero energy high efficiency targets and through carbon offsetting initiatives the Council will deliver residential energy improvement projects.

Building on the Mayor of London's Housing Design Guide, the council will seek the highest quality housing standards and associated play and informal recreation space in new affordable housing built in the borough. The Council is also working with partners to develop its own design standards for housing produced through Section 106 Planning agreements

4.6 Self-build and custom housing

The Self Build and Custom Housing Act 2015 requires the council to hold a register of individuals and associations of individuals who are seeking serviced plots of land (i.e., serviced with water, electricity, etc) to either self-build their own homes or use custom housing (e.g., housing, wholly or partly assembled in factories). The council will be maintaining such a list as required by law and will monitor interest in this form of housing.

Action 6: Analyse the register of self-builders in line with statutory requirement in order to inform the Local Plan and respond to self and custom build demand.

4.7 Regeneration and fostering a community spirit

Ultimately it is people, not the council, who make communities work. Fostering a community spirit, a key theme of the East End's history is important part of that. The council plays an important role in facilitating the kind of communities that evolve through the kinds of homes that are developed and who is able to access them. This community spirit and community

cohesion that holds it together has become an increasingly important objective as the profile of the borough – in terms of race, age and incomes – has changed radically in a generation. During the consultation process, residents told us that they were concerned about the continuing redevelopment of parts of the borough, including social housing estates, which were considered to be threatening the existence of communities rather than helping to build them.

With the major growth of residential, business and cultural activity across the borough in the past and expected in the future, this community spirit and the values that underpin them have been under pressure. Some communities have been displaced by regeneration projects and others have witnessed large scale development very close to their homes, but have not seen this change as good thing.

As outlined in the Local Plan section, major growth in jobs and housing are expected during the next decade or so. The perennial challenge for all local authorities is how this growth is harnessed to maximise social, economic and environmental gains for existing and particularly disadvantaged communities from the enormous private sector economic activity undertaken in Canary Wharf; the City of London adjacent to the borough (including Aldgate); Whitechapel; and other growth areas in the borough.

Consequently, we need a specific strategy to address the needs and aspirations of young people in the borough who are joining the world of work for the first time to ensure they receive the benefits of new and continuing private investment in the borough. We also need to be mindful of the needs and aspirations of people who have retired or who are unable to work so that they are not left behind in what is a fast-moving, constantly evolving environment. This needs to be part of the council's wider approach to how we engage and include communities in the future.

As referenced earlier, the three opportunity areas in the borough in the Lower Lea Valley including Poplar Riverside, South Poplar, and City Fringe / Tech City (including Whitechapel) is where the main growth will be in the future.

Later this year, the Mayor will be considering a new growth strategy to help ensure local job opportunities are maximised for local people. There will continue to be a wide range of employment opportunities in the borough and we need to make sure that our residents have access to them, whether they are graduate opportunities, apprenticeships or opportunities for people looking to re-join the employment market. A particular focus will be on maximising apprenticeships for local people from building contractors the council is working with.

In November 2016 the benefit cap for households without an adult in work will reduce to £23,000 a year cap. For households who are paying high rents, the housing benefit or housing element of Universal Credit, will mean such households will need to ensure wherever possible that one member enters the employment market if they wish to avoid rent arrears and other associated debts. The council and its registered provider partners have a role to play to access such opportunities to households in order to facilitate both economic inclusion and avoid household poverty and homelessness itself.

Action 7:

Ensure the council's future housing interventions help foster a community spirit

Develop a new growth strategy to help ensure local job opportunities are maximised for local people

Section 5 - Delivery Theme 2 – Meeting people’s housing needs

Why this is important

Maintaining a high supply of new affordable housing is a core theme of this strategy, and it's as important that these homes are allocated on a fair, inclusive and transparent way. Due to the continuing high demand for affordable and other forms of suitable accommodation, the council has to think innovatively about how to meet this demand. This means considering housing options outside the borough and also using private rented accommodation to meet its homelessness duties.

Particular attention is given to people with both physical and mental health needs and what kind of accommodation is suitable for such applicants to live independently, or with some onsite or floating support (meaning support provided through regular visits), based on what their assessed housing and health needs are. There are also other specific areas of housing needs which the council needs to adopt approaches to which are covered in this section.

The previous section focused on how the council is going to increase the amount of affordable housing and to ensure residents benefit from economic growth and regeneration in the borough. This section focuses on who receives support in meeting their housing needs and on what basis.

5.1 Common housing register allocation scheme

The council is required by law to have a Housing Allocation Scheme which sets out how local people can join the housing register. The council operates its scheme in partnership with housing associations that have homes in the borough and are signed up as borough partners.

For that reason, the council's scheme is called *The Common Housing Register Partnership Allocations Scheme (23 April 2013)*. As part of the housing strategy consultation process, we are going to review and consider amending some aspects of the scheme in conjunction with our Partnership members.

The Mayor in Cabinet in November 2016 agreed a number of changes to the Common Housing Register Allocation Scheme. These are principally to:

- Note the changes to the Allocations Scheme regarding the new Right to Move for employment reasons. This new government regulation came into effect on 20th April 2015 requires local authorities to set aside 1% of lets to rehouse social tenants from elsewhere in England who want to move for employment reasons where the employment is more than one year and over 16 hours per week.
- Agree to a new sub band in Band 2 of the Allocations Scheme to avoid the risk of legal challenge to present policy on applicants in housing need who do not meet the 3 year residence requirement – this is because of a recent court case involving Ealing Council where their policy included a similar residential requirement that was successfully challenged by a homeless applicant fleeing domestic violence who did not meet the criteria.
- Agree to restrict existing policy that allows applicants to bid for 1 bed smaller than their assessed need where room sharing would only be accepted for children of opposite sexes under 10 years old - the current scheme allows applicants to bid for homes 1 bed

smaller than their assessed housing need, principally to mitigate the impact of the Bedroom Tax and Welfare Reform changes. Common Housing Register partners are concerned that some cases rehoused causes inappropriate overcrowding. It is proposed to retain the policy, but only allow children of opposite sex sharing a room if both are under 10 years old.

- Authorise the use of some social housing general needs stock as non-secure tenancies for temporary accommodation up to a maximum of 100 units per annum. This will help build up the council's supply of temporary accommodation to meet homeless needs.
- Agree the Lettings Plan for 16/17 and extend it to 17/18. This sets out the quotas for certain need groups, such as the foster carers, care leavers, and key workers, for social housing.
- Agree to add social worker to the professions that qualify for key workers status set out in the Allocations scheme – this is proposed as the council is experiencing difficulties in recruiting and retaining experienced social workers.

The report also proposes to use private rented accommodation to discharge its homelessness duties in limited circumstances.

The Mayor also deferred agreement on whether to amend the quota for Band 3 lets from 10% of one, two and three bed properties to 5% of 1 bed & studios per annum to allow further consideration.

Action 8: Refresh the Common Housing Register Allocation Scheme to widen housing options for the council to give priority to those in housing need and use private rented housing and other suitable accommodation to meet housing needs.

5.2 Intermediate housing register

Many working people who want to live in the borough can neither qualify to join the housing register to access affordable rented housing nor afford to buy a home on the open market. This means they either live in private rented accommodation, often sharing with others, or leave the borough altogether. One of the themes of this housing strategy is to create housing choices for all sections of the borough's diverse community. To achieve this we need to look at how choice in the intermediate housing market can be both increased and widened. At the moment, housing choices are confined to shared ownership (part rent, part ownership) schemes and sub market intermediate rent schemes, meaning rents are above social rents but below private rents, normally at least 20% below.

We know from the responses to our consultation, and the evidence supporting our Local Plan, there is strong demand for this kind of housing. Many working people on low to medium incomes who do not rely on state benefits have their housing choices limited to the private rented sector. Despite interest rates continuing to be at a historic low, people who are unable to save for a deposit (often because they are spending much of their disposable income on high rents) and are not able to access home ownership.

A robust indicator of demand would be provided by an Intermediate Housing Register. This register would have similar but looser rules on eligibility and priority to that which governs the Common Housing Register for those needing affordable rented housing. For example, we could give priority to people living in the borough; consider creating quotas for essential workers; restrict access to intermediate housing choices to people over a certain income and

savings, but also ensure the expectations of applicants who may not be able to sustain the costs associated with home ownership are managed carefully. The approach to quotas could be simple. For example, for every five homes available, one (or more) could be set aside for essential workers. The challenge is to identify who is an essential worker, appreciating also such workers once allocated a home, may then choose to take up a different occupation.

This will also require a clear read-across between the local scheme that the council intends to establish and the Mayor of London's official *First Steps* intermediate housing programme which sets what affordable home ownership products are available in the capital and what the rules are for accessing them. There may be scope for working jointly with the Mayor of London's approach to allocating homes developed under the London Living Rent programme, a proportion of which will be allocated on a pan-London basis.

The Mayor of London's recent announcement (Sept 2016) on his approach to London Living Rent gives a clearer indication of the priority he is giving to both this product and working applicants in housing need on incomes of between £35,000 and £45,000. The council will need to give some thought to what priority it wishes to give this product and how such homes developed in the borough will be allocated.

Just as we need to continue delivering more affordable rented housing, we need to ensure that those who need affordable housing for home ownership (or intermediate rent) have choices too. The Mayor of London's London Living Rent product can help with widening choice for such applicants in the future. The intermediate register could act as the gateway for those applying for homes built at living rent as proposed in section 4.2 of this document. In practice is likely that homes will be available to apply for on the following basis:

- London Living Rent Homes – A web portal on the GLA website where applicants will be able to view and apply for homes which either available to all applicants and Tower Hamlets applicants, with quotas for each groups
- Tower Hamlets Living Rent Homes – A web portal on the Tower Hamlets council website which will only be for Tower Hamlets applicants

There is also scope for the council to provide some general advice on home ownership choices, but any advice on mortgages (relevant to shared ownership) will need to be provided by an Independent Financial Advisor.

Action 9: Develop and implement an intermediate housing register and consider whether quotas should be adopted for certain categories of essential workers.

5.3 Homelessness Strategy

The council currently has in place a *Homelessness Statement 2013 to 2017* which sets out our approach to preventing and reducing homelessness focused on:

- Homeless prevention and tackling the causes of homelessness
- Access to affordable housing options
- Children, families and young people
- Vulnerable adults

Many aspects of this document are still relevant particularly those related to partnership working and prevention but over the next 12 months we will consider what other options are available to prevent and meet homelessness demand. These will include:

- Use of Temporary accommodation for homeless families

The Homelessness Strategy will also need to consider the options to reduce the number of homeless households from Tower Hamlets who are currently in temporary accommodation. At present there are around 2,000 households in temporary accommodation, of whom over 1,000 are placed outside the borough. Over 200 households are in bed and breakfast accommodation. The council recognises that there are different forms of homelessness. These can include:

- Rough sleepers who can include ex-service personnel
- Women fleeing domestic violence
- Former tenants of private rented accommodation where their tenancies have not been renewed
- People who are sofa surfing at friends' and families' homes
- People with mental health issues

In meeting emergency housing need, bed and breakfast accommodation creates uncertainty and upheaval for residents and is becoming increasingly expensive for the Council to procure, with suitable accommodation proving too expensive in borough resulting in more households being placed in outer London and beyond. The council recognises that such an approach can cause disruption to people's lives, particularly those with a local connection with the borough, but the acute shortage of affordable housing and now the high cost of private rented housing, beyond Local Housing Allowance levels, means the council has to consider all options to ensure homeless people have a roof over their heads. With the advent of the Universal Credit cap of £23,000 for non-working households, this will mean that some non-working applicants will only be able to afford to rent homes in lower value areas outside the borough. With likely reductions in Discretionary Housing Payments (DHP) to provide additional funding to make up the gap between housing benefit and private rents, this is going to become a bigger issue in the future. Taking account of the housing needs of ex-offenders and people suffering from mental health issues are a continuing challenge for the council to address.

The Council needs to agree how best to tackle this problem with potential solutions including:

- remaining committed to the *No second night out* objective (and ideally ensuring there is *no first night out* through mediation with landlords and tenants) and minimising the use of bed and breakfast accommodation
- The Council may provide emergency accommodation to no priority need homeless clients for the purposes of preventing or reducing rough sleeping
- developing its own temporary accommodation as set out at 4.4 above
- using existing permanent council and registered provider properties for short term homeless housing as set out at 5.1 above
- continuing to use homes temporarily on estates that are being decanted for regeneration
- continue publishing under what circumstances it will place households outside of the borough
- buying back ex Local Authority homes sold under the Right to Buy.

We will update the homelessness document to reflect progress over the past 3 years and will engage fully with all partners in early 2017 to develop a further 4 year action plan to continue

to tackle homeless. There will be an emphasis on ensuring the most vulnerable and marginalised groups who face homelessness can continue to be assisted linking their support into their health needs, education and employment chances and overall wellbeing.

Progress since 2013 includes:

- **No wrong door Project**

The Council's Housing Options service introduced its innovative programme – called No Wrong Door to ensure that customers can access all the services they need to help resolve their housing problems from one point of contact rather than having to navigate their way through lots of different agencies themselves.

The Council's Housing Options service has been transformed to offer more help to those threatened with homelessness or needing housing advice. Instead of being able to simply offer advice on housing options, staff are working closely with other agencies so as to be able to offer information on a comprehensive range of services that help with problems that often cause homelessness or housing difficulties. This includes money advice, debt counselling, landlord and tenant mediation, specialist legal advice, help in accessing education and training, help in seeking work, access to child care and our Children's Centres.

Our Housing Options staff can make referrals to other agencies to ensure clients get the help they need, and some support services are now operating from Albert Jacob House in Bethnal Green E2 the where Housing Options staff are based.

- **Overview and Scrutiny Commission recommendations**

The Overview and Scrutiny Commission held a review of the Homelessness Services and produced 17 recommendations for consideration by the Housing Options Team. These recommendations are being addressed by the service and will either be implemented at an operational level or through the refreshed Homelessness Strategy.

- **Hostel Commissioning Plan**

The Council is developing a Hostel Commissioning Plan (HCP) 2016-2019 which was approved by the Mayor in July 2016.

It was agreed that future hostel commissioning priorities should focus on meeting the needs of those who are the most complex, whilst also aiming to provide advice and assistance to those with lower needs. In addition there will be a plan to reduce the level of women only and abstinent hostels services. In order to ensure the needs of the service users are better met, whilst ensuring provision of choice and control is maintained it was further agreed to remodel and reconfigure current services and provision in conjunction with partners.

- **Homelessness Partnership Board**

The Council will reform its Homelessness Partnership Board drawing on the expertise of Housing Association, voluntary sector and other statutory partners such as the health services to oversee the production, delivery and monitoring of the action plan.

- **Homelessness Reduction Bill 2016**

At the time of finalising this Strategy, a Private Members' Homelessness Reduction Bill was before Parliament. Core to the Bill's purpose is a duty to prevent homelessness, building on the current duty to meet its consequences. The council is already committed to preventing where possible homelessness in all scenarios. We recognise that it is important to prevent where possible the instances of non-priority homelessness as these have the potential to become priority cases of the future. Whilst the council is broadly supportive of the Bill's aims, with sources of permanent and temporary accommodation diminishing, placing additional homelessness duties on local authorities will be challenging.

Action 10: Refresh our Homelessness Statement into a strategy and align it with the 2016-21 Housing Strategy.

Action 11: Reconvene the Homelessness Partnership Board who will oversee the production, delivery and monitoring of the action plan

5.4 Tenancy Strategy, including fixed term tenancies

The council is required by law to have a Tenancy Strategy that sets out what kind of social housing tenancies should be granted by housing associations and the council (through Tower Hamlets Homes) in the borough and what basis those tenancies should be renewed. Housing associations are required to have due regard to the council's Tenancy Strategy but are not required to follow the policies that are set out.

The government through its Housing and Planning Act intends that future tenancies granted by the council should be for fixed terms of between two years and 10 years. The government is also proposing that where families have children under the age of nine, a tenancy should be granted that will last until the youngest child reaches the age of 19. There will be some exceptions to fixed term tenancies, possibly for the elderly and the disabled, which will be set out in regulations to be set by central government in the future. Depending on the level of flexibility allowed by government it is intended that the new Tenancy rules will be further consulted upon.

The government is also proposing that other than where a spouse or civil partner is succeeding a tenancy, the new tenancy should be for a fixed term. The new Tenancy Strategy, once adopted will impact on future tenancies granted by Tower Hamlets Homes, and influence the tenancy policies of our local housing association partners.

In summary, our broad approach will be as follows:

- Applicants over the age of 65 should be granted lifetime tenancies
- Applicants who are severely disabled should be granted lifetime tenancies, with exceptions made where the property is wheelchair accessible accommodation
- Applicants who have children under the age of nine years old should have tenancies for 10 years
- General needs applicants (including those who succeed a tenancy) should be granted tenancies of no less than ten years
- There should be a presumption of a fixed term tenancy being renewed if the tenant(s) housing needs are the same (or greater) than at the time of the original application
- Introductory tenancies for council tenants and starter tenancies for should be for 12 months, increased to 18 months where the tenant has not met one or more of the tenancy conditions, e.g., non-payment of rent; anti-social behaviour. This will be in addition to the fixed terms identified above.

It should be noted that the granting of a fixed term tenancy does not mean a tenant cannot qualify to exercise their right to buy providing they meet the qualifying conditions.

For housing association landlords, we would want them to continue the policy lettings homes on Assured Tenancies (i.e., lifetime tenancies) at social rents, but recognise in some instances this may not be possible to do that because of contractual arrangements associated with the development of new Affordable Rent accommodation. However, the council does not wish to see existing social rent homes which become empty, converted to Affordable Rent homes or with fixed term tenancies. The council welcomes the Mayor of London's recent announcement (Sept 2016) that no further rent conversions (meaning from social rent to Affordable Rent) will be supported as part of his new affordable homes programme.

Action 12: Refresh the Tenancy Strategy to take account of legislative changes requiring local authorities to issue fixed term tenancies

5.5 Tackling overcrowding

The council currently has in place a 2016-2018 Overcrowding Action Plan which was updated in March 2016 and includes the following:

- Property based actions by delivering larger family accommodation through s106 schemes and new affordable housing schemes.
- Lettings actions set through the operation of the Common Housing Register Allocation Scheme (April 2013).
- Advice and partnership actions by ensuring all housing associations with stock in the borough sign up to the Common Housing Register Forum.
- Under occupation actions by developing bespoke packages to meet specific households' needs; encouraging housing associations to reduce under-occupation; and financial incentives to encourage under-occupiers to consider moving.

The Council's Overview and Scrutiny Housing sub committee has agreed to carry out a review of under occupancy and the findings of the committee will be incorporated into an updated plan.

Action 13: Keep under review the Overcrowding and Under-occupation Plan

5.6 Older People's Housing Needs

People are living longer and often do not have housing choices that enable them to move to more appropriate accommodation that meets their needs. In an affordable housing context, this can involve small-sized households, sometimes single people, under-occupying family homes which could be used for larger households. Whilst the council has access to sheltered housing for older people available through its Housing Association partners, older people's needs sometimes require consideration of health and/or mobility issues. The need to continue to meet the two aims of the council's 2013 – 2015 Older Persons' Statement remain valid, which are:

- Aim 1: Provide a range of good quality accommodation and access to home adaptations and improvements that offers older people housing that meets their needs.

- Aim 2: Help older people to continue to remain active, independent and healthy in their homes supported by flexible and affordable services.

The council's view is that a third aim should be added to this which is:

- Aim 3: Develop a specific approach that meets the needs and wishes of older people that will help incentivise households who are under-occupying by giving them a wider range of choice. This aim recognises that is a large and growing cohort of older people who do not require institutionalised care as well as those who do, often through extra care schemes

The Council has agreed that rather than refresh its Older Persons' Statement it will contribute fully towards the development of the Council's forthcoming Ageing Well Strategy that aims to cover all aspects of the health, wellbeing and quality of life of people growing older in Tower Hamlets – ensuring that Tower Hamlets is a borough where growing older is about retaining independence and dignity with the assistance of family friends and the community where necessary but knowing that the right care and support is there if that independence becomes significantly reduced. A continuing challenge are the costs associated with older patients who are unable to leave hospital because they don't have a suitable home and/or care to return to, also known as 'bed blocking'. The financial cost of this is being borne by the health sector, but some joint working and possibly sharing of costs and savings may offer some incentives and opportunities to address this issue. There are a range of housing options (for example, sheltered accommodation, extra care housing) and interventions (for example, providing disabled adaptations to residents' homes) but these resources are limited. Given that we can expect housing and health challenges associated with an ageing population to grow, innovative working between the relevant agencies and most crucially the residents concerned will be needed.

Key housing issues which will have to be reviewed include defining future provision of older persons housing requirements as required by the current National Planning Policy Framework (NPPF) and reviewing all aspects of support for the ageing population including support through sheltered residential and extra care housing. The GLA also has funding available for older people's housing under the current 2015-18 programme and we expect to be continued in the forthcoming 2016-21 programme. Given the continuing growth of this cohort of need together with the council's objective of reducing under-occupation in the borough's social housing stock, we will need to take a fresh view on whether his source of funding can add value to the council's approach.

The scope of the proposed strategy encompasses the breadth of responsibilities placed upon the local authority by the Care Act 2014. In summary these responsibilities are centred on:

- maintaining and promoting independence and wellbeing
- facilitating the development of a vibrant social care market in the borough
- assessing and providing for needs which the authority has a duty or power (subject to available resources) to meet. This encompasses both the provision of a range of services in the community (to enable the individual to continue living in their own home) and the provision of residential and nursing home care when living in your own home is no longer a viable option
- safeguarding vulnerable individuals.
- working in partnership with the NHS and other stakeholders to deliver integrated and personalised care and support.

The strategy will also provide a core reference point for the future development of service delivery and/or commissioning strategies for a range of adult social care and supported housing services including:

- Information and advice provision.
- Community support, handypersons and befriending type services;
- Advocacy.
- Personal care.
- Daytime activities provision.
- Support and care in sheltered and extra care sheltered housing.
- Residential and nursing home care.

A reference group incorporating all stakeholders including residents and carers and housing partners will be set up to oversee the development and implementation of the Strategy.

Action 14: Contribute towards the development of the Corporate Ageing Well Strategy which includes reference to developing accommodation designed to meet the needs and wishes of older people.

5.7 Supported Housing and use of temporary accommodation

Supported Housing plays an important role in providing accommodation for people who may have dependency issues, such as alcohol, drugs, or who have particular mental health issues. Other needs that need to be met include those of rough sleepers; people with learning difficulties; and people with specific health needs. Consideration also needs to be given to children leaving care and those fleeing domestic violence. The services required, such as floating support, to enable people to live independently is funded through the Vulnerable Adults Commissioning team.

Some of these groups immediate and longer term needs will be picked up through policies developed out of the Homelessness Strategy, which will include reference to the need for 'move on' accommodation so that supported housing is available to those who most need it. We will consider the needs of all these groups when developing new housing and reviewing allocations policies and take into account the view of our partner organisations who provide services to the most vulnerable people in our community.

The Government announced in September 2016 that it intended to devolve Supporting People funding to local authorities to provide additional top up funding to providers where necessary, reflecting the higher average costs of providing supported accommodation. It also indicated that it intends to exempt women's refuges, alms houses and community land trust from the Local Housing Allowance (LHA) Cap, but supported housing schemes will not be exempted. What this means is that the services that some clients need with their accommodation will not be fully eligible for housing benefit with the gap met from the devolved funding. Whilst the devolved funding is expected to be ring-fenced, it's unclear how long this funding will last for given the continuing reduction in public money allocated to local authorities to deliver local services. The 1% rent reduction to social housing will still apply to Supported Housing schemes.

Overall, we expect the changes to have a negative impact on the delivery of new supported housing schemes and possibly impact on existing services. The council will seek to mitigate the impacts of these policy changes where possible.

Action 15: Ensure that supported housing needs are reflected in both the common housing register allocations scheme and the delivery of new affordable housing.

5.8 Housing for people with disabilities and long term health conditions, including autism

The vulnerable adults commissioning team are developing an Accommodation Plan which will provide an overview of the accommodation available to people with learning disabilities (LD). The borough seeks to improve the overall offer of accommodation including opportunities to invest to save whilst also supporting young people to remain close to their families, friendship networks and local community. We expect the number of people with disabilities and long term conditions, for example, dementia, autism, to grow and people are likely to live for longer with these health conditions. The Children and Disabilities Joint Strategic Needs Assessment (JSNA) for the borough states that the number of children with special educational needs (SEN) and disabilities is higher than both London and England averages. It is therefore likely that the demand for accessible housing will increase and the design of new local housing needs to reflect that. Taken with the longer term broad objective of relocating people with learning disabilities currently located outside the borough back into Tower Hamlets, this will increase demand for suitable accommodation, often on the ground floor, also,

It is recognised that this is just the start of a longer piece of work and in the next three years will be undertaking additional research to ensure that services are responding to the changing needs of this population. This will include an analysis of older carers; degenerative disease in older people with learning difficulties as well as a larger review of all out-of-borough placements.

The national autism strategy asks local authorities if their housing strategies specifically identify the housing needs of people living with autism which include an estimate of how many people with autism we would be expecting to i) live in the community ii) live in supported housing iii) live in residential / nursing care. The Transforming Care programme is a national programme that aims to further reduce the number of people with a learning disability and/or autism who display behaviour that challenges, including those with a mental health condition who are in institutions, particularly aiming to reduce the number of in-patient facilities and increase the number of people with an LD or autism who are living in the community. The council expects there to be continued availability of funding under the Home Ownership for people with learning difficulties (HOLD) as part of the forthcoming investment prospectus and will need to assess what level of local demand there is to meet.

The council will work corporately towards meeting the needs of people with learning difficulties and autism over the next three years.

Action 16: Support the development of the Accommodation Plan for People with learning disabilities (LD) and support the development of accommodation for those with other disabilities and long term conditions, including autism.

5.9 Project 120 - meeting the needs of people who use wheelchairs

Project 120 (P120) was started in 2012 to address the specific housing needs of families with a wheelchair user and other complex medical needs on the Council's Housing waiting list. The name stems from the 120 families who were on the Accessible Housing waiting list at that time.

The Council works closely with developers and housing associations to identify specific needs of a family at an early stage and identify a property in development which can then be adapted accordingly to meet that need. The project has been very successful and by April 2016, 148 families had been rehoused in new accommodation bespoke built to meet their needs.

Action 17: Work closely with colleagues and partners to support the most vulnerable people in the borough and continue to meet their housing needs

5.10 Gypsies and Travellers

Part of the Local Plan development process deals with assessing the housing needs of gypsies and travellers in the borough. As part of this process, council officers from planning; housing and environmental health will liaise to ensure that gypsy and traveller housing needs are fully considered in housing strategy and set out in the Local Plan to be adopted in autumn 2017.

Action 18: Assess the existing and future requirements for the gypsy and traveller communities

5.11 Young people and housing

Young people in Tower Hamlets experience homelessness each year in significant numbers. In 2015-16, more than half of the homelessness reported to the borough by single people came from those under 35, whilst just under a quarter who reported homelessness were aged between 18-25 (23%).

Risk indicators of homelessness for young people vary widely. These can include non-attendance at school or not being in education, employment or training (NEET), ongoing disputes with younger siblings, inter-generational conflict sometimes related to opposing religious and cultural values within the household, periods in childhood in local authority care, overcrowding, involvement in offending, abuse and violence in the home, teenage pregnancy, parental relationship breakdown and other parental factors.

Young people on low incomes unable to live in the family home face a number of difficulties accessing affordable alternative housing. A room in a shared house for rent privately is in virtually all parts of London beyond the budget of most u-35s who are in low waged work or entirely benefit dependant, due to housing benefit restrictions. New housing benefit restrictions which will apply to social housing from 2018 could also make the social sector unaffordable for many young people. In addition, from February 2017 phased introduction of new rules for job-seekers aged 18-21 could see many lose access to financial help with housing costs.

Action 19: Ensure that young people's housing needs are fairly reflected in the development of housing allocation and homelessness policies and the negative impact of welfare reforms are mitigated where possible.

5.12 The Waterway Community

Tower Hamlets is served by three interconnecting canals, the Grand Union, Hertford and Limehouse Cut. The canal network is managed by the Canal and River Trust with the Council having responsibility for planning matters related to the waterways in the borough. The number of people on boats using the network in the borough and across London has risen significantly over the past 5 years, possibly as it can provide a cheaper alternative to mainstream housing with the majority of users being transient 'continuous cruisers' moving on a regular basis around the whole London network.

There are relatively few fixed moorings in the borough but partners have identified some areas where permanent houseboats or medium term leases could be set up. The Housing and Planning Act 2016 includes a duty for local authorities to consider the needs of people residing places on inland waterways where houseboats can be moored. In order to meet this duty the Council has entered into an initial dialogue with partners including housing associations on the opportunities available on the canal network. The need for more residential moorings is supported by the Port of London Authority who are also keen to see the river retained for transport purposes.

Action 20: Investigate the possibility of developing more fixed moorings across the Borough's canals in order to provide additional fixed term housing opportunities

Section 6 – Delivery Theme 3 – Raising private rented housing standards

Why this is important

The private rented sector is now the largest segment of the local housing market. While private renting works well for some, not least as a short-term option, it is increasingly becoming the only option for people who want to rent a home in the social sector - or to buy a home - but can't save for a deposit because private rents are so high. A part of the housing strategy is about creating more choice for such households, but in the meantime we need to ensure that the standards of accommodation for people in private rented housing are good – not only by weeding out the bad landlords who give the sector a poor reputation but also by working to professionalise the sector, supporting “amateur” and small landlords to provide decent, well-managed homes to their tenants. Whilst much of the new-build private housing in the borough is well managed, some private sector rented homes are in poor condition and poorly managed.

Around 15,000 ex-council homes bought under the right to buy are now being let by private landlords. In some instances this has led to serious overcrowding and anti-social behaviour such as noise nuisance fly-tipping, and drug-related criminal behaviour on estates owned by the council and its housing association partners. We will work jointly with our partners to tackle these issues. The need to improve joint working runs as a theme through the strategy, underpinning a number of interventions that the council is undertaking in respect of private sector housing and other initiatives and issues it has to consider. These will be brought together through a stand-alone 2016-21 Private Sector Housing Strategy which will include reference to:

6.1 Landlord Licensing Scheme

A landlord licensing scheme has been introduced for private landlords in the west of the borough covering the following areas:

- Spitalfields and Banglatown
- Weavers
- Whitechapel

The council wants to use selective licensing to tackle anti-social behaviour, deal with poor housing standards and assist in improving the overall management of rented accommodation. The Council could consider extending this scheme to homes in multiple occupation (HMOs) provided further conditions are met.

Actions 21: Review selective and additional licensing schemes for the private rented sector, ensuring that the schemes are adequately resourced; explore options for a scheme for houses in multiple occupation; and lobby government to use legal powers available adopt a wider licensing scheme where necessary.

6.2 Closer working with private sector landlords including promoting accreditation

As a means of improving the quality of private rented housing across the borough, the Council wants to improve the quality and professionalism of private landlords. The Council is committed to supporting the London Landlord Accreditation Scheme. The Scheme awards accreditation to reputable landlords who undergo training and comply with a code of conduct. It was set up in 2004 as a partnership of landlord organisations, educational organisations and 33 London boroughs. Accreditation is a condition of access to Empty

Property Grants and is funded by the Council where a landlord lets through our Housing Options service to a homeless family.

Action 22: Develop enhanced support for landlords, including through the London Landlord Accreditation Scheme, to improve the quality of housing and management in the private rented sector.

6.3 Private Sector Housing Renewal policy 2016-21

The council is required to have a private sector housing renewal policy. The council's current Private Sector Housing Renewal Policy 2016 – 2018, makes available a mix of grants and loans, some of which are means-tested, to tenants and landlords that fund bringing long term empty homes back into use. It also features Disabled Facilities Grants and Home Repair Grants that allow tenants to live independently in their homes

In May 2016, Council Tax records showed that 4,595 properties in Tower Hamlets have been empty for more than a year. Of these 2,963 are residential properties; 1,632 are commercial. Around half of these are second homes. However, many are in a neglected state and have a damaging impact on their local area.

The Council has concerns about the perceived trend of homes bought off-plan being left empty. The Council is also concerned that inappropriate Airbnb-style holiday letting may be reducing the availability of housing and causing nuisance to communities. We need to research these perceived trends, establish the evidence and plan what interventions, if any, are required.

In the context of a housing crisis, vacant properties could provide desperately needed homes. The Council can adopt a number of approaches towards bringing empty properties back into use including negotiating with owners, empty property grants, enforcement through Empty Dwelling Management Orders and Compulsory Purchase Orders

Disabled Facilities Grants and Home Repair Grants also feature in the Private Sector Housing Renewal policy that allow tenants to live independently in their homes

Disabled Facilities Grant is now contained within the Better Care Fund (BCF), a programme spanning both the NHS and local government. The intention is to better integrate health, social care, and housing support to the most vulnerable disabled people in our society, placing them at the centre of their care and support. The overall use of grant in relation to working across the sector, in particular to better enable hospital discharge and home security, will be developed over the course of this strategy.

On the trend of 'Buy to Leave' where homeowners are leaving homes empty, the council is keen to build up an evidence base to understand the scale of the issue in the borough and work with the GLA who are undertaking their own pan-London research.

Actions 23:

Develop an evidence base on the extent of Buy to Leave in the Borough and if necessary review the action the Council could take to reduce the number of new homes that are being purchased but being left empty by investors and by owners of existing empty properties.

Adopt an updated private sector housing strategy for 2016-21 which includes reference to the Better Care Fund approach and addressing empty homes issues.

6.4 Housing conditions: investigation and enforcement

The Private Housing Strategy supports the use of the full range of statutory powers available to enforce housing safety and standards. These include not only existing powers to deal with housing hazards and with statutory nuisance, but also new powers provided under the Housing and Planning Act 2016 to tackle criminal and rogue landlords more robustly.

To raise private rented housing standards, council officers on a cross departmental basis will need to develop a holistic approach to develop further and implement its statutory responsibilities and implement the priorities identified in this section.

Action 24: The council will continue to undertake its statutory responsibilities to ensure private rented sector housing is safe to live in and is well managed.

6.5 Promoting the rights of private tenants

Part of the council's work in this area will be promoting the rights of private tenants. This will include:

- Working with community partners and programme a regular publicity campaign to promote awareness of private tenants' rights - including on the Council website, in Our East End, and through posters in public spaces, Ideas Stores, and Council offices.
- Publishing and publicise expectations of how landlords should carry out the 'Right to Rent' checks consistently and fairly to avoid discrimination.
- Engaging with private tenants including through forums
- Provide tenancy training to homeless households moving into the private rented sector

Action 25: Develop and implement a programme of engagement with residents and stakeholders to promote the rights of private tenants.

6.6 Other private sector housing issues

Other issues relating to the private rented sector including supporting the Right to Manage for private sector and housing association leaseholders, influencing the growth and reach of institutional investment in quality private rented homes and promoting joint working towards all aspects of private rented sector housing are discussed in more detail in sections 4.8 to 4.10 of the Private Sector Housing Strategy.

Section 7 – Delivery Theme 4 - Effective partnership working with residents and stakeholders

Why this is important

As a guiding principle, more is achieved through working with people than not. Partnership working at its highest level is illustrated through the council's work with partners on the Community Plan, adopted in 2015. In housing terms, the council continues to be reliant on partners in the housing association and broader third sector to help deliver its housing objectives. A key element of this partnership working centres on the operation of the Common Housing Register and the Preferred Partners Agreement (PPA) which the council wishes to see continue. As part of this Strategy we are intend to review the PPA arrangement but remain committed to the principle of having development partners who are committed to local housing priorities. In addition the council places strong value on its partnership working with residents and seeks to underpin this by ensuring the boards of Tower Hamlets Homes and local housing associations have resident representation.

The council needs to consider the way it works with its partners, primarily its residents; housing associations; and other stakeholders in the borough and the Greater London Authority.

It will be important that the council is clear in expressing what changes are going to be proposed over the coming years and explain why. Some issues such as the passing into law the introduction of fixed term tenancies will involve further consultation and some difficult discussions with existing tenants and particularly those who hope to live in the borough in the future.

The introduction of Universal Credit benefits system may mean that council and housing association tenants in the future will have to pay their rent in a different way so we need to make sure advice and support is in place to ensure rent arrears do not build up.

In terms of specific areas of partnership working in the future:

7.1 Tower Hamlets Homes and the council's tenants and leaseholders

Tower Hamlets Homes (THH) is the arm's length management organisation (ALMO) that is responsible for managing and maintaining the council's housing stock of some 21,000 social rented homes and leaseholder homes originally sold under the right to buy.

The ALMO, a company 100% owned by the council, was established to access government funding to deliver a decent homes programme, to repair and modernise the housing stock, whilst this programme was completed in 2016, the council continues to make significant investment in its stock to maintain a decent standard.

There has been an initial consideration of a possible extension of the Management Agreement (MA) for two years to July 2020. The decision of whether to extend the management agreement or to take an alternative approach is highly dependent on the local context. The decision will be driven by the wider housing strategy of the borough, the nature of the local housing market and the need for councils to deliver services more efficiently. THH is a key Council partner in mitigating some of the risks to the HRA over the next few years particularly, in relation to the revised rent legislation within the Welfare Reform and Work Act, and policies included in the Housing and Planning Act.

Action 26: Consider extending the council's management agreement with Tower Hamlets Homes.

7.2 Tower Hamlets Housing Forum: working with our registered provider partners

The council works in partnership with around 50 housing associations in the borough, half of whom are members of the Common Housing Register, who collectively own and manage more homes than the council.

Specific areas of partnership working between the council and housing associations are:

- Preferred Partners Agreement - where certain housing associations which develop new housing in the borough are accredited by the council as preferred partners
- Common Housing Register Allocation Scheme – which is the council's and local housing association partners' allocation scheme for the borough
- Common Housing Register Agreement - where all new and empty homes that become available to occupy are allocated to applicants in need on the basis of the allocation rules set out in the Allocation Scheme

Some of our local housing associations – Poplar Harca, Eastend Homes and Tower Hamlets Community Housing – were set up by the council to deliver decent homes, improvements, new homes and broader regeneration outcomes which they have been undertaking. There are areas of housing management work, for example, waste management and dealing with anti-social behaviour in homes bought under the right to buy where the council and housing associations have a shared interest in addressing, which may involve some future joint working.

With the government's recent decision to force housing associations to reduce their rents by 1% for four years, this has meant that housing associations nationwide are progressing discussions about merging. Although a 1% reduction for four years doesn't sound much, this reduction has had a profound impact on housing association financial planning. This has impacted on the council (through Tower Hamlets Homes) too with difficult decisions having to be made about future investment. The impact on housing associations' business plans – particularly those who are developing new homes – is causing some organisations to pursue merger opportunities to insulate themselves from potential future financial difficulties.

We're concerned that such mergers will have a negative impact on local service delivery and negatively impact on broader strategic investment decisions. We are particularly keen that Tower Hamlets based local housing associations stay locally focused and accountable and we will work with the statutory authorities – principally the Greater London Authority and the Homes and Communities Agency - to make sure this remains the case.

A further issue is the government's stated intention to deregulate the housing association sector. What this means in practice will emerge over time, but our concern is that agreements and understandings in place on issues such as nomination agreements; responsibility to house homeless households; and council rights to nominate members to housing association boards will loosen.

The large majority of new affordable housing for rent will be delivered by housing association partners, most of whom are members of the council's Preferred Partners Panel. We intend to review the rationale for maintaining this arrangement, recognising that there will be

difficulties maintaining it and the difficulties associated with the council prescribing who builds future affordable housing in the borough.

The council is keen to support the work and independence of borough-focused registered providers and are prepared to work with them to assess how their investment capacity can be maximised to meet the major development and regeneration opportunities that remain in the borough. Ideally new housing that is developed by local partners in the borough, in partnership with the council (possibly with the support of the Mayor of London), can enhance the position of our local partners.

Action 27: Develop more effective working with registered providers operating in the borough delivering local priorities remain local, independent and accountable to residents. To achieve this, the council will seek to:

- crystallise this effective working relationship in the form of a covenant that sets out the obligations that the council and its registered partners have to each other and the residents that we work for in order to support local housing associations deliver our shared objectives including individual development and regeneration projects.
- continue its partnership working arrangements with registered providers through the Common Housing Register
- review the Preferred Partnering Protocol
- review how in partnership with borough-focused registered providers investment capacity can be maximised to meet major development and regeneration challenges that remain in the borough.

7.3 East London Housing Partnership and other local authorities

As well as liaising closely with the Mayor of London and the Greater London Authority, the council works with its partner authorities in the East London Housing Partnership. This work covers a range of housing issues and will continue to do so as many of the issues we face in Tower Hamlets are faced by our neighbouring authorities also. As set out earlier in this document, the council is looking beyond our borough boundaries (and beyond East London) to deliver new housing options. We will need to be sensitive in our approach and work on a partnership basis and see where possible shared priorities can, if possible, be met.

Action 28: Continue to work in partnership with our East London neighbouring authorities and develop new partnerships where the council is seeking to meet its housing needs.

7.4 Private sector development partners

The council works with private sector developers on a daily basis, not least through negotiating affordable housing through the planning process, usually called S106 legal agreements. These agreements require developers to deliver certain obligations in return for a planning consent. There is a broader and perennial challenge of negotiating social value from private sector investment. This is not exclusively about housing, but connects with the earlier priority to help ensure local people have access to quality employment opportunities.

Action 29: Continue to work in partnership with private sector partners to generate better employment opportunities for local people.

7.5 Third Sector Partners

Core to our partnership approach is working with third sector agencies many of which are members of the Tower Hamlets Council for Voluntary Service. Whilst many employ members of staff they are by definition reliant on people giving their time and money voluntarily to help support people who make up the Tower Hamlets community. One of their major assets is their contribution to filling the service gap that public and private sector agencies are unable to fill, nurturing community activities and services and providing forums for people to meet and interact, fostering community cohesion.

Action 30: Continue to work in partnership with third sector partners to generate better employment opportunities and broader community regeneration outcomes for local people.

7.6 Helping to deliver healthier communities

The aim of the Tower Hamlets Health and Wellbeing Board (HWBB) is to improve the health and wellbeing of Borough residents. The Board's work programme is led by the borough's Director of Public Health in partnership with health and other stakeholders. The board is responsible for producing the Joint Health and Wellbeing Strategy and also the Joint Strategic Needs Assessment (JSNA) which in housing and health terms helps stakeholders understand what future health needs have to be catered for and what the housing implications of those needs are. A broader responsibility of the Board is promote healthy lifestyles, e.g., reducing alcohol and tobacco dependence, reducing teenage pregnancies; tackling obesity; which proactively reduce future dependence on day to day health services. As part of its future approach, the Board has identified five areas for transformation:

- Addressing the health impacts of deprivation
- Helping communities lead change around health
 - Healthy place
 - Tackling childhood obesity; and
 - Developing a truly integrated system to support health.

Quality housing accommodation makes a significant contribution to individual and community well-being. However, it's not always the case that households have this platform to live healthy lives. Issues such as overcrowding and damp, poorly ventilated accommodation are likely to contribute to negative health outcomes and with an increasing number of vulnerable households in private, temporary accommodation where housing conditions are generally poorer. There is an obvious read across to the work of housing stakeholders and there is already considerable joint working between the HWBB and housing association partners represented on the Tower Hamlets Housing Forum, referenced in section 7.2 of this strategy document. Future joint work could include working with housing associations to promote health and care issues such as GP registration, screening programmes and health promotion.

Linked to this is the wider agenda of *Making Every Contact Count* which encourages conversations based on behaviour change methodologies (ranging from brief advice, to more advanced behaviour change techniques), empowering healthier lifestyle choices and exploring the wider social determinants that influence all of our health.

Action 31: Tower Hamlets housing stakeholders will continue to support and disseminate the work of the Health and Wellbeing Board to deliver better health outcomes for the borough's residents; facilitate the dissemination of the *Making Every Contact Count* approach.

7.7 Working with our residents

Ensuring that residents' needs and aspirations are reflected in the council's work on housing will need to be core to our future strategic approach.

- Engagement and Representation

Giving residents the opportunity to express what's important to them will need to continue featuring in what the council and its partners do. Whether this is through board membership on local housing associations; representation on scrutiny panels; speaking rights at meetings; or just making sure residents' enquiries and complaints are dealt with effectively as possible will help ensure residents' views are effectively represented. The council remains committed to maximising the amount of new affordable housing to rent and buy that is delivered in the borough and retaining what we have, new priorities that have arisen from the growth of private rented housing means that we need to widen our approach and the expertise that underpins it.

- New homes on council-owned land

We also understand that existing residents, particularly on council estates, are concerned about new build schemes that are being proposed on council-owned sites that can contribute to the council's objective of 1,000 new council homes by 2018. We recognise that concern, but ultimately the scale of the housing crisis is such that we need to consider and propose schemes that some residents will find difficult to accept. The council will always ensure that residents have the opportunity to have their say with all proposed schemes having to meet the council's planning policies.

- New Homes on housing association-owned land

Whilst the council is the single largest social landlord in the borough, taken together housing associations have more social housing stock than the council. This is partly because of the transfer of stock from the council to housing associations under the *Housing Choice* process, with the other reason being the significant development of new affordable housing in recent decades. Most of the largest housing associations in the borough are represented on the Tower Hamlets Housing Forum referenced in section 7.2 of this section.

In tandem with the council seeking to redevelop council estates – Ocean and Robin Hood Gardens as examples – using housing associations as partners, there is a more recent trend of housing associations seeking to redevelop their own stock, without direct assistance from the council. Given the high values of land in the borough and the limited amount of public subsidy to build new homes, this is a trend that we expect to continue. However, there are certain guiding principles that we intend to adopt when considering proposals that are put forward to the council and affected residents for consideration. The council will expect:

- the number of social rented housing units to be replaced on a 'like for like' basis, for example, space standards, but also allowing for some changes of mix to reflect tenants' changed accommodation needs, caused, for example, by overcrowding

- tenants to be able to move once or at minimum have a right to return to their area
- housing options for leaseholders to remain in their area
- at least 50% affordable housing on the proposed new development
- tenants and leaseholders to be consulted from the outset on proposals and to have access to their own independent tenant advisors and ideally a consensus reached on development proposals

The council will always ensure that residents have the opportunity to have their say with all proposed schemes having to meet the council's planning policies.

- Meeting welfare reform challenges

As welfare reform continues to roll out, we think some tenants will struggle with the introduction of the new Universal Credit. This will mean housing benefits, instead of being paid direct to the landlord, will be paid to the applicant with other benefits, which means they will need to pay their rent to the landlord. With competing household expenses, some tenants may find it difficult to prioritise, and fall into rent arrears as a result. With the reduction in the Universal Credit to £23,000 a year for non-working households. Ensuring that tenancy packs have details of benefit entitlements and contacts for key service providers, including information on local community facilities can help with the broader objective of helping tenants to settle in to use their home as the platform to realise their wider ambitions. The council will need to strike a balance between sharing information electronically through social media as well as more traditional ways through leaflets and meetings.

Action 32: Tower Hamlets housing stakeholders will continue to ensure that residents' needs and aspirations are reflected in the work that they undertake; ensure residents have the opportunity to have their voices heard by the key housing stakeholders; ensure that up to date and accessible housing advice is given to residents impacted by the continuing roll out of welfare reform.

7.8 Working with the Mayor of London and the Greater London Authority

This housing strategy document makes extensive reference to the housing ambitions of the Mayor of London which the Greater London Authority (GLA) will have a core coordinating and investment role to help deliver the majority of the affordable housing the borough needs. The GLA has played a significant planning and investment role in the council's success, delivering the affordable housing it has delivered to date. A recent example of that partnership is demonstrated by the creation of the Poplar Housing Zone. The council expects this partnership to continue and widen given the breadth of Mayoral commitments set out in Section 3 of this document.

Later in 2016, we expect the GLA to publish an Investment Prospectus for the 2016/21 Affordable Housing Programme; a Draft Affordable Housing Supplementary Planning Guidance (SPG) document; more detail on the proposed London Living Rents. This will require a considerable level of engagement between the council and the GLA, some of which will be through the East London Housing Partnership referenced above, in order to ensure the Mayor's ambitions are realised in a successful and sustainable way.

Action 33: The council and Greater London Authority (GLA) will continue to work in partnership to realise the Mayor of London and Tower Hamlets' shared housing objectives.

Section 8 – Our approach to equalities

The Equality Act 2010 places equality mandatory duty on local authorities (and other public bodies) to protect people from discrimination in the workplace and in wider society. To meet this duty, the Council needs to consider all individuals when carrying out their day-to-day work when shaping policy, in delivering services and in relation to their own employees. It also requires that public bodies to:

- have due regard to the need to eliminate discrimination
- advance equality of opportunity
- foster good relations between different people when carrying out their activities

The adoption of the Housing Strategy and associated documents requires the Council to undertake an Equalities Impact Assessment (EqIA) to fully assess what the positive, negative or neutral impacts of adopting the documents will be on defined equality groups. The nine relevant protected characteristics of these groups are:

1. Disability
2. Gender Reassignment
3. Pregnancy and maternity
4. Race
5. Religion or belief
6. Sex
7. Sexual orientation
8. Marriage and civil partnership
9. Age

Tower Hamlets has an additional category aimed at reducing social and economic exclusion.

10. Socio economic

An initial Equality Assurance Checklist has been completed which does not identify an adverse impact from these proposals on the equality groups of the nine protected characteristics. A full assessment of individual policies such as the Allocations Scheme and Homelessness Strategy will be carried out and if any potential negative impacts are identified mitigating actions will be identified accordingly.

Respondents to the consultation on the Housing Strategy 2016 – 2021 Consultation document have been requested to be mindful of the duty placed upon the Council in relation Equality Act 2010 and are asked to identify any potential impacts of the proposals contained in this document on the equality groups accordingly.

Section 9 - Financial Overview – Resourcing the delivery of the housing strategy

When framing a housing strategy and identifying policy actions to deliver them, the next issue to consider is resources. Work will need to be undertaken to ensure responsibilities are allocated to officers and a detailed workplan prepared. This section sets out in broad terms a financial overview of the environment in which the council and its partners work within. The focus is primarily on the funding the delivery of new affordable homes.

9.1 Government Funding

The government has set out in clear terms its policy towards housing and particularly council housing in its 2016 Housing and Planning Act which is described in Section 3 of this document. The government plans to end the issuing of lifetime tenancies; require council landlords to sell its own higher value homes to fund the extension of the right to buy for housing associations; and have imposed a reduction in rents over a four year period on all social landlords. The government has also made clear that the future funding for new affordable housing will be focused principally on affordable home ownership through shared ownership and starter homes programmes, neither of which are likely to be affordable to most people in the borough on low to medium incomes. Therefore the council is not expecting any significant support from central government to meet the significant housing challenges the council and its partners are facing.

9.2 Greater London Authority Funding

The GLA on behalf of the Mayor of London administers funding programmes that channel funding available from government to build new affordable housing. The GLA in recent years has promoted Housing Zones which take a longer term, more holistic area-focused approach to realising large scale development opportunities. In Tower Hamlets, there is a Housing Zone for Poplar Riverside which is expected to deliver 9,000 new homes.

In tandem with this, significant interventions in the field of estate regeneration have been undertaken using a model of demolishing council homes to be replaced with a mix of private for sale; shared ownership; and housing association homes (usually for tenants displaced by the works) has been successfully undertaken all over London, with Tower Hamlets one of the leading agencies for change. We expect this trend to continue and the GLA are funding schemes under its Estate Regeneration Fund to achieve this.

At the time of writing, a financial settlement between the Mayor of London and the government had yet to be announced, but it is clearly likely to be less generous than previous funding rounds, but still set alongside more ambitious targets. The Mayor of London in September 2016 set out the broad principles that will support the new London Living Rent product which will be for working households on incomes of between £35,000 and £45,000. The council expects this to be a key feature of the affordable homes programme to be published later in 2016. The settlement from government will provide funding for new affordable housing from 2018 onwards, probably over three years, but longer for Housing Zones schemes (if supported). The GLA would normally have regard to their own Housing Strategy and London Plan when considering what priorities it wants to fund and on what terms. But it is noted that the current London Plan and Housing Strategy (adopted by the previous Mayor

of London) are quite different to the stated housing ambitions of both the new Mayor, Sadiq Khan, and central government, most noticeably on the balance between homes for rent and homes for affordable home ownership, so it is to be expected that both the London Plan and London Housing Strategy will be subject to revision in the coming years.

Given the borough hosts three Mayor of London Opportunity Areas (where opportunities for major housing growth have been identified as described in Section 4.1 of this document) the council and its partners are well positioned to be recipients of new funding. New funding is likely to be increasingly focused on equity loans rather than grant. This is particularly useful for the initial stages of major regeneration projects which require 'front funding' to help buy out leaseholders and undertake enabling work, but this money does need to be paid back to government in the future with the intention of recycling it for interventions elsewhere.

A major issue in Tower Hamlets continues to be the high cost of land and associated enabling costs. In value for money terms, schemes delivering affordable housing in outer London where land prices are lower are likely to look more attractive. The adoption of the National Planning Policy Framework and the impending introduction of the Starter Homes Initiative means it will be increasingly difficult to require private developers to provide affordable housing for rent and for the future, it is increasingly likely that the council itself will be the change agency using its own land, money and efforts that will deliver the affordable rented housing it clearly needs.

We expect the Mayor of London to publish later in 2016:

- The Investment Prospectus which will set out funding priorities for the 2016-21 affordable housing programme
- Draft Affordable Housing Supplementary Planning Guidance
- Detailed guidance on the levels of proposed London Living Rents

This will set the direction of housing investment strategy and policy in the capital for the immediate future.

9.3 Tower Hamlets Council Funding

The council's Cabinet considered in July 2016 a report entitled 'Housing Revenue Account: Outline 30 Year Business Plan and Medium Term Financial Outlook'. The Housing Revenue Account (HRA) relates to the activities of the Council as landlord of its dwelling stock, and the items to be credited and debited to the HRA are prescribed by statute. Income is primarily derived from tenants' rents and service charges, and expenditure includes repairs and maintenance and the provision of services to manage the Council's housing stock. The HRA also benefits from some but not all of right to buy receipts and can benefit from other funds, such as the government's new homes bonus. These funds can contribute towards the development of both new Council and Housing association housing.

The HRA is self-financing and no longer reliant on government subsidy, meaning the council needs to plan carefully and prudently for the future, ensuring there is sufficient funding to meet its landlord obligations to its tenants and leaseholders over the medium to long term. The original intention was to give local authorities greater freedom to use their assets and income, but in 2015 it was announced that social rents would be reduced by 1% for four years beginning in 2016/17. Combined with

the sale of higher value empty council homes, these initiatives have had a negative impact on the scope of what the council would like to do in the future.

Despite the difficult position the council finds itself in due to the government announcement on rents in 2015, over the next 30 years, the council expects to spend over £1bn (today's prices) on maintaining its stock as well as funding a significant programme of new council home building. The council has a programme of over 500 new council homes to be built (See Section 4.3) with a commitment to build a total of 1,000 council homes by 2018.

To deliver the housing strategy commitments – particularly those focused on new housing delivery – the council will need to be flexible in its approach in order to realise new priorities and initiatives that emerge in the future. Inevitably this will involve close partnership working our development partners and residents of the borough, using what land, money, borrowing powers and people resources to maximum effect.

An issue with many local authorities are facing relates to rising costs of temporary accommodation (TA) for homeless people. We expect the trend of homelessness to rise and this means TA costs are likely to rise as well unless the council does something about it. In section 4.4 of this document we set out in more detail what options we are looking at to mitigate the long term financial impacts of this trend which will include greater reliance on the private rented sector, including such accommodation outside the borough.

9.4 Tacking Fraud

As important as ensuring the Council achieves best value through the use of existing resources is to ensure that fraudulently activity is tackled to ensure the scarce homes available are used to meet the genuine needs of those identified through the Council's common housing register allocations scheme.

Social housing tenancies have a very high economic value. This means that there are people who are prepared to adopt what is now criminal behaviour to mislead council officers and officers from its partner housing associations in order to gain a council or housing association tenancy; and/or place their own tenants in that home on an unauthorised basis; and in some instances exercise a right to buy.

High rents in the private sector and the close proximity of Tower Hamlets to the City and Canary Wharf creates conditions which can make sub-letting attractive. The Council will seek to develop existing collaborative working arrangements to target use of social/affordable rent/home ownership homes for sub-letting activity and commercial gain as well as being diligent in its scrutiny of Right to Buy applications which attract substantial discounts for those purchasing.

9.5 Conclusion

From time to time, there will be a need to review specific actions, for example, when the Mayor of London's new Housing Strategy is finalised and certain policies that the council has adopted need to amended to fit with them. In effect, this means this housing strategy will need to be a 'live' document, reviewed annually, taking account of what is a very fast moving environment.

The remainder of this document is a schedule of the actions set out in the strategy which will deliver the vision that we set out in the beginning of the document. The council will develop a workplan that will help deliver the objectives we set out.

Section 10 – Housing Strategy Actions

<p>Delivery Theme 1 – More affordable housing, economic growth and regeneration</p>
<p>Action 1: Maximise affordable housing building from all sources of housing supply, with a focus on the borough’s three opportunity areas</p>
<p>Actions 2:</p> <ul style="list-style-type: none"> • Use council-owned sites to deliver 100% rented housing combining social target rents and homes at ‘living rent’. • Use council-owned sites to develop higher rent homes let to applicants from a separate waiting list and potentially developed by a council owned Housing Company. • Reduce government defined Affordable Rents to lower levels including social target rents taking into account the possible reduction in overall affordable homes for rent. • Plan for emerging Government policy, in particular the proposed requirement to deliver 20% Starter Homes on schemes over 10 units as part of the affordable housing offer. • Review its policy regarding commuted sums for affordable housing, with the aim of: <ul style="list-style-type: none"> ▪ Creating mixed and sustainable communities ▪ Considering the overall output of affordable housing ▪ Making best use of Council owned land/assets. • Develop clear affordable housing policy for market sale, for discounted market sale including Starter Homes and shared equity schemes with reference to evidence available regarding take up of subsidised home ownership schemes. • Explore long term financial investment from institutions for an intermediate rent product for households with average/median incomes.
<p>Action 3: Complete a full capacity study of Council owned land site (within the Housing Revenue Account and the General Fund) to identify opportunities and funding options.</p>
<p>Actions 4:</p> <ul style="list-style-type: none"> • Set up a housing company to deliver new homes both inside and outside the borough. • Explore the merits of the developing a co living model of housing for working people. • Explore the merits of the council buying or developing its own accommodation to meet emergency and temporary housing needs for homeless households. • Explore the use of modular housing to assist in meeting homeless and mainstream housing need across the Borough.
<p>Action 5: Ensure new developments are built to near zero energy high efficiency targets and through carbon offsetting initiatives the Council will deliver residential energy improvement projects.</p> <p>Building on the Mayor of London’s Housing Design Guide, the council will seek the highest quality housing standards in new affordable housing built in the borough.</p>
<p>Action 6: Analyse the register of self-builders in line with statutory requirement in order to inform the Local Plan and respond to self and custom build.</p>
<p>Action 7: Ensure the council’s future housing interventions help foster a community spirit Develop a new growth strategy to help ensure local job opportunities are maximised for local people</p>

Delivery Theme 2 - Meeting people's housing needs
Action 8: Refresh the Common Housing Register Allocation Scheme to widen housing options for the council to give priority to those in housing need and use private rented housing and other suitable accommodation to meet housing needs.
Action 9: Develop and implement an intermediate housing register.
Action 10: Refresh our Homelessness Statement into a Strategy and align it with the 2016-21 Housing Strategy.
Action 11: Reconvene the Homelessness Partnership Board who will oversee the production, delivery and monitoring of the action plan
Action 12: Refresh the Tenancy Strategy to take account of legislative changes requiring local authorities to issue fixed term tenancies.
Action 13: Keep under review the Overcrowding and Under-occupation Plan.
Action 14: Contribute towards the development of the Corporate Ageing Well Strategy which includes reference to developing accommodation designed to meet the needs and wishes of older people.
Action 15: Ensure that supported housing needs are reflected in both the common housing register allocations scheme and the delivery of new affordable housing.
Action 16: Support the development of the Accommodation Plan for People with a Learning Disabilities (LD) and support the development of accommodation for those with other disabilities and long term conditions, including autism.
Action 17: Work closely with colleagues and partners to support the most vulnerable people in the borough and continue to meet their housing needs.
Action 18: Assess the existing and future requirements for the gypsy and traveller communities.
Action 19: Ensure that young people's housing needs are fairly reflected in the development of housing allocation and homelessness policies and the negative impact of welfare reforms are mitigated where possible.
Action 20: Investigate the possibility of developing more fixed moorings across the Borough's canals in order to provide additional fixed term housing opportunities
Delivery Theme 3 - Raising private rented housing standards
Actions 21: Review selective/additional licensing schemes for private rented sector; explore options for a scheme for houses in multiple occupation; and lobby government to use legal powers available adopt a wider licensing scheme where necessary.
Action 22: Develop enhanced support for landlords, including through the London Landlord Accreditation Scheme, to improve the quality of housing and management in the private rented sector.
Action 23: Develop an evidence base on the extent of Buy to Leave in the Borough and if necessary review the action the Council could take to reduce the number of new homes that are being purchased but being left empty by investors and by owners of existing empty properties; Deliver an updated private sector housing strategy for 2016-21 which includes reference to the Better Care Fund approach and addressing empty homes issues.
Action 24: The council will continue to undertake its statutory responsibilities to ensure private rented sector housing is safe to live in and is well managed.
Action 25: Develop and implement a programme of engagement with residents and stakeholders to promote the rights of private tenants.

Delivery Theme 4 - Effective partnership working with residents and stakeholders
Action 26: Consider extending the council's management agreement with Tower Hamlets Homes.
<p>Action 27: Develop more effective working with registered providers operating in the borough delivering local priorities remain local, independent and accountable to residents. To achieve this, the council will seek to:</p> <ul style="list-style-type: none"> • crystallise this effective working relationship in the form of a covenant that sets out the obligations that the council and its registered partners have to each other and the residents that we work for in order to support local housing associations deliver our shared objectives. • continue its partnership working arrangements with registered providers through the Common Housing Register • review the Preferred Partnering Protocol. • review how in partnership with borough-focused registered providers investment capacity can be maximised to meet major development and regeneration challenges that remain in the borough.
Action 28: Continue to work in partnership with our East London neighbouring authorities and develop new partnerships where the council is seeking to meet its housing needs.
Action 29: Continue to work in partnership with private sector partners to generate better employment opportunities for local people.
Action 30: Continue to work in partnership with third sector partners to generate better employment opportunities and broader community regeneration outcomes for local people.
Action 31: Tower Hamlets housing stakeholders will continue to support and disseminate the work of the Health and Wellbeing Board to deliver better health outcomes for the borough's residents; facilitate the dissemination of the <i>Making Every Contact Count approach</i> .
Action 32: Tower Hamlets housing stakeholders will continue to ensure that residents' needs and aspirations are reflected in the work that they undertake; ensure residents have the opportunity to have their voices heard by the key housing stakeholders; ensure that up to date and accessible housing advice is given to residents impacted by the continuing roll out of welfare reform.
Action 33 : The council and Greater London Authority (GLA) will continue to work in partnership to realise the Mayor of London and Tower Hamlets' shared housing objectives

Annex A - Glossary of Terms

Affordable Rented Housing – comprises two forms of affordable rented housing.

- Social rented housing is usually owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime.
- Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80 per cent of the local market rent (including service charges, where applicable).

Arm's Length Management Organisation (ALMO) – an organisation set up and owned by the council to manage its housing stock. The ALMO in the borough is called Tower Hamlets Homes.

Assured Tenancy – The type of tenancy issued by housing associations which are 'lifetime' tenancies. For new tenants, these are preceded by a 'Starter Tenancy', usually for one year.

Assured Shorthold Tenancy (AST) – The type of tenancy issued by housing association landlords which are fixed term tenancies, usually preceded by a Starter Tenancy for one year, sometimes extended to 18 months. ASTs are usually for five years, but can be as short as two years or longer than five years. Private landlords also use this tenancy, but usually issue them for shorter periods, between 6 months and year, but can be longer.

Common Housing Register Allocation Scheme – The council is required by law to produce a Housing Allocation Scheme. In Tower Hamlets, the council works in partnership with local housing associations to produce a joint document, the Common Housing Register Allocation Scheme. This document sets out the policies which decide who can go on the register which may mean being allocated affordable rented housing in the borough. The scheme also sets out how homelessness needs are met.

Community Land Trust housing model - An alternative form of intermediate housing is through community land trusts. The model is based on the land on which the homes are built being retained for affordable housing in perpetuity. The mutual home ownership model requires that prospective occupiers become co-operative members who pay a housing cost based on what they can afford and over time, build up a premium over and above meeting the costs necessary to meet the co-op's housing management and loan costs. This premium can be released if the occupier leaves the scheme for alternative accommodation.

Commuted Sums – See S106.

Department for Communities and Local Government (DCLG) – The government department of state responsible for housing, planning and regeneration, which also sponsors the Homes and Communities Agency.

Fixed Term Tenancy – The type of tenancy issued by local authority or ALMO landlords which are for fixed terms. These are usually for five years (but can be for longer), but can be as short as two years or longer than five years. These tenancies have the same rights and conditions as Secure Lifetime Tenancies, but are for fixed terms.

Greater London Authority – comprises the Mayor of London; London Assembly; and the staff who support their work. It is the capital's strategic regional authority, with powers over transport, policing, economic development, housing, planning and fire and emergency planning. The Mayor is responsible for producing the London Housing Strategy and the London Plan. The council's housing strategy and local plan need to be in general conformity with the Mayor's documents.

Homes and Communities Agency (HCA) – The government appointed regulator of housing associations who are registered with the HCA, i.e., registered providers. The HCA provides governance and financial viability ratings for individual housing associations.

Housing Allocation Scheme – See Common Housing Register Allocation Scheme.

Houses in Multiple Occupation (HMOs) – are privately rented homes where residents occupy individual rooms and use the kitchen/bathrooms on a shared basis. These can be homes which are houses, maisonettes or flats. If the home is three storeys or more, it needs to be licensed by the council for occupiers' use. Increasingly HMOs can be found in former council rented and our stock transfer partners' properties.

Housing Associations – are social landlord organisations which are not local authority landlords, who provide affordable rented accommodation. Housing associations registered with the Homes and Communities Agency are known as 'Private Registered Providers' and used to be known as Registered Social Landlords (RSLs).

Intermediate Housing – A broad term to describe accommodation which is intended to be affordable for working households available for rent; ownership or a combination of rent and ownership. Such households do not usually qualify to go on the Common Housing Register but are not able to afford housing on the open market for private rent or ownership.

London Living Rent – A new intermediate housing product which the Mayor of London is promoting, based on the principle that rents shouldn't be more than around a third of what people earn.

Secure Lifetime Tenancy - The type of tenancy issued by councils or ALMOs which are 'lifetime' tenancies. For new tenants, these can be preceded by an 'Introductory Tenancy', usually for one year.

Local Plan – A local authority planning document that sets out the council's proposed planning and land allocation policies over a set period of time.

Low Cost Home Ownership (LCHO) – A form of affordable housing that is available for sale at less than open market values, either through shared ownership or at a discounted price.

Private Rented Housing – Accommodation let by private landlords at market rates, usually on an Assured Shorthold Tenancy. Private rented housing should be considered part of the market housing sector.

Registered Providers – Housing associations and Arms-Length Management Organisations (ALMOs) which are registered as providers of affordable housing with the Homes and Communities Agency (HCA).

S106 – is a legal agreement between a developer and the council for the developer to provide specific community contributions in return for the council granting planning consent

for a scheme. These community contributions can be money – commuted sums – to go towards building schools, health facilities, or affordable housing. Alternatively it can be an agreement to do certain things, for example, environmental improvements or provide affordable housing. The housing is usually provided through the developer contracting with a housing association.

Shared Ownership – An intermediate housing product available from housing associations (and more recently other bodies) whereby the applicant buys a share of a home (not less than 25%) and rents the remainder.

Starter Homes – A government-sponsored affordable housing product which will be available to buy at no more than £450,000 (or £250,000 outside London) and no more than 80% of local market values. The government wants to require local authorities to deliver Starter Homes through private developers.

Tenancy Strategy – A statutory local authority document that sets out its policy on the types of affordable housing tenancies (i.e., lifetime tenancies or fixed term tenancies) they wish to see granted by Registered Providers in their areas and on what terms they think the tenancies should be renewed. With the passing of the Housing and Planning Act 2016, it is likely this will need to be revised to reflect the requirement for the council (through Tower Hamlets Homes) to issue fixed term tenancies.

Tower Hamlets Homes – The council's arms length management organisation (ALMO) which manages the council's housing stock.

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London Borough of Tower Hamlets
Draft 2016-21 Homelessness Strategy Outline

Index

Section 1 – Reasons for a Homelessness Strategy

Section 2 - What we say about homelessness in our Draft 2016-21 Housing Strategy (July 2016), reviewing progress that we have made

Section 3 - Reviewing the Homelessness Statement 2013-17

Section 4 - Options to inform the development of the council's 2016-21 Homelessness Strategy:

Theme 1 – Homeless Prevention and Tackling the Causes of Homelessness

Theme 2 - Access to Affordable Housing Options

Theme 3 - Children, Families and Young People

Theme 4 – Vulnerable Adults

Section 1 – Reasons for a Homelessness Strategy

Introduction

A local authority with housing responsibilities – a local housing authority – under the 2002 Homelessness Act may carry out a homelessness review for their district and following that may formulate and publish a homelessness strategy based on the results of that review. It is expected that such strategies should be refreshed every 5 years.

Tower Hamlets Council previously adopted a *Homelessness Statement 2013 to 2017* which set out the council's approach to both addressing homelessness needs as defined by legislation – meeting its statutory duties - and what advice and support it was able to give to help prevent homelessness.

The council has decided to adopt a new 2016/21 Housing Strategy which sets out in broad terms the council's broad approach to housing in its area. In connection with this, the council has decided to refresh its *Homelessness Statement 2013 to 2017*, building on what has been achieved; introducing new policy actions; and aligning the new document with the council's new housing approach. An important document to read in conjunction with this document is the Common Housing Register Allocation Scheme (also being refreshed in 2016) which sets out in more detail how the council and its registered provider partners intend to meet its statutory homelessness duties.

National Policy – Legislation and Guidance

In addition to the statutory requirements of the Housing Act 1996 as amended by the Homelessness Act 2002, the government from time to time issues guidance, for example on allocations, and also information on how local housing authorities can address specific issues, such as rough sleeping. Also published are Regulations that set out in more detail the requirements of legislation.

The Localism Act 2011 was intended to allow local authorities more flexibility when managing or allocating accommodation. The provisions included the power for local authorities to discharge their full homelessness duty by providing suitable private rented accommodation for people who applied after November 2012, regardless of whether the homeless person agrees.

An important document for consideration when framing the housing allocation scheme is the *DCLG Allocation of accommodation: guidance for local housing authorities in England (June 2012)*. This makes clear that people who are homeless should be given reasonable preference – a head start on some other applicants - when determining housing priorities.

The government also published a *Vision to end rough sleeping: No Second Night Out nationwide* (July 2011) which sets out six commitments related to people who sleep rough which are focused on:

- Helping people off the streets
- Helping people to access healthcare
- Helping people into work
- Reducing bureaucratic burdens
- Increasing local control over investment in services
- Devolving responsibility for tackling homelessness

The principle behind No Second Night Out is that a person's or household's housing crisis may mean they are homeless for one night, but that there should be a sufficiently wide ranging, flexible suite of services available from local authorities that ensure that they are not roofless for a second night.

The government published *Making every contact count: a joint approach to preventing homelessness (2012)* which stated that:

Effectively preventing homelessness goes beyond addressing immediate housing needs and requires a sustained commitment across all agencies to address the underlining causes of homelessness. These are often: unemployment, low skills levels, substance misuse, mental health issues, crime and dysfunctional family background.

The document highlighted the need to recognise that homelessness is often one symptom of a wider range of challenges applicants are facing and that such needs need to be met in a holistic fashion. This involves a considerable degree of cross departmental and inter-agency working and happens on a regular basis and it's clear that this kind of working is likely to increase.

For the future, it is expected that the government will be placing a homelessness prevention duty on local housing authorities in England replicating the duty adopted in Wales. Whilst this duty is not in place, this appears to be the direction of travel of national policy and the council will need to be giving early thought to how this requirement can be met at a time of increasing homelessness demand and diminishing resources. The council already provides assistance to non-priority homeless households on a discretionary basis, which closely mirrors the Welsh system. Subject to the detail of future legislation, if this responsibility becomes statutory, there are likely to be additional costs associated with the services required.

Regional Policy - Homes for London – The London Housing Strategy (June 2014)

The Mayor of London has a statutory duty to publish and consult on a housing strategy for the capital, which needs to be aligned with his London Plan. The current strategy was adopted by the previous Mayor of London, Boris Johnson, and the council expects the recently elected Mayor, Sadiq Khan, to set in train a process to revise the current document.

There are two specific policy commitments homelessness which centre on working with boroughs to reduce rough sleeping and promoting the use of NOTIFY and the pan-London inter-borough accommodation agreement when placing homeless households in out of borough accommodation. The council will continue to help deliver the two policy commitments set out in the current housing strategy and will work with the new Mayor on new strategy and policy commitments designed to reduce homelessness and rough sleeping.

Homelessness Reduction Bill 2016

At the time of finalising this Strategy, a Private Members' Homelessness Reduction Bill was before Parliament. Core to the Bill's purpose is a duty to prevent homelessness, building on the current duty to meet its consequences. The council is already committed to preventing where possible homelessness in all scenarios. We recognise that it is important to prevent where possible the instances of non-priority homelessness as these have the potential to become priority cases of the future. Whilst the council is broadly supportive of the Bill's aims,

with sources of permanent and temporary accommodation diminishing, placing additional homelessness duties on local authorities will be challenging.

In conclusion

Ultimately, a sustained increase over the medium to long term in the provision of affordable rented accommodation (and associated supported housing) would lead over time to a reduction in reported homelessness. The amount of funding available to support the delivery of affordable rented housing supply across the capital is likely to fall given the government's commitment to supporting low cost home ownership accommodation. The situation is further exacerbated by trends in the private rented market.

The ending of Assured Shorthold Tenancies in the private rented sector has become the main cause of homelessness in London. This, combined with the fact that local housing allowance has been frozen since 2011 at a time when private rents in London have increased substantially has meant the private rented sector is an increasingly unaffordable and unsustainable housing option for people who are on average or low incomes and threatened with homelessness. This in turn is likely to result in homelessness continuing to have an upward trajectory.

The council has also struggled to procure affordable private sector temporary accommodation to fulfil its statutory duties to homeless households, resulting in a substantial increase in the cost of temporary accommodation to the general fund. Nevertheless there are occasions when suitable, affordable private sector options arise which can help prevent or relieve homelessness.

Given the availability of affordable private rented accommodation is likely to diminish, unless local housing allowance and temporary accommodation subsidy are increased to more closely match market rents, the council needs to actively plan for a future with the objective of diversifying the supply of temporary accommodation thereby reducing the dependence on expensive PRS stock and achieving an affordable pipeline of accommodation for the prevention and relief of homelessness. This will mean:

- Reviewing what accommodation we have access to now
- Creating our own portfolio of temporary accommodation and taking a strategic view on which areas this accommodation should be located
- Increasing the use of general needs accommodation for temporary accommodation purposes
- Securing our own emergency accommodation to reduce and ideally end the use of bed and breakfast accommodation
- Ensuring that available accommodation is allocated on need, and that the Council exercises its powers and ensures its lettings policy enables an annual reduction in the number of households in temporary accommodation.
- Proactively monitoring the financial welfare of households who are likely to be impacted by the benefit cap to prevent homelessness
- Responding to the potential demands arising from a possible Homelessness Reduction Act in 2017.

This homelessness strategy is about how the council intends to meet the local impact of this trend. This will involve considering a range of permanent and temporary housing options described later in this document to meet these needs, both in the borough and outside it.

Section 2 - What we say about homelessness in our Draft 2016-21 Housing Strategy (July 2016) and reviewing progress that we have made

The Draft 2016-21 Housing Strategy sets out the following on its approach to homelessness.

Homelessness Strategy

The council currently has in place a Homelessness Statement 2013 to 2017 which sets out our approach to preventing and reducing homelessness focused on:

- *Homeless prevention and tackling the causes of homelessness*
- *Access to affordable housing options*
- *Children, families and young people*
- *Vulnerable adults*

Many aspects of this document are still relevant particularly those related to partnership working and prevention but over the next 12 months we will consider what other options are available to prevent and meet homelessness demand. These will include:

- Use of Temporary accommodation for homeless families

The Homelessness Strategy will also need to consider the options to reduce the number of homeless households from Tower Hamlets who are currently in temporary accommodation. At present there are around 2,000 households in temporary accommodation, of whom over 1,000 are outside the borough. Over 200 households are in bed and breakfast accommodation.

This form of accommodation creates uncertainty and upheaval for residents and is becoming increasingly expensive for the Council to procure, with suitable accommodation proving too expensive in borough resulting in more households being placed in outer London and beyond.

The Council needs to agree how best to tackle this problem with potential solutions including:

- *developing its own temporary accommodation as set out above*
- *using existing permanent council and registered provider properties for short term homeless housing,*
- *continuing to use homes temporarily on estates that are being decanted for regeneration*
- *continue publishing under what circumstances it will place households outside of the borough*
- *buying back ex-Local Authority homes sold under the Right to Buy*

We will update the homelessness document to reflect progress over the past 3 years and will engage fully with all partners in 2017 to develop a further 4 year action plan to continue to tackle homeless. There will be an emphasis on ensuring the most vulnerable and marginalised groups who face homelessness can continue to be assisted linking their support into their health needs, education and employment chances and overall wellbeing.

Progress since 2013 includes:

- ***No wrong door Project***

The Council's Housing Options service introduced its innovative programme – called No Wrong Door to ensure that customers can access all the services they need to help resolve their housing problems from one point of contact rather than having to navigate their way through lots of different agencies themselves.

The Council's Housing Options service has been transformed to offer more help to those threatened with homelessness or needing housing advice. Instead of being able to simply offer advice on housing options, staff are working closely with other agencies so as to be able to offer information on a comprehensive range of services that help with problems that often cause homelessness or housing difficulties. This includes money advice, debt counselling, landlord and tenant mediation, specialist legal advice, help in accessing education and training, help in seeking work, access to child care and our Children's Centres.

Our Housing Options staff can make referrals to other agencies to ensure clients get the help they need, and some support services are now operating from Albert Jacob House in Bethnal Green E2 the where Housing Options staff are based.

- Overview and Scrutiny Commission recommendations

The Overview and Scrutiny Commission held a review of the Homelessness Services and produced 17 recommendations for consideration by the Housing Options Team. These recommendations are being addressed by the service and will either be implemented at an operational level or through the revised Homelessness Statement.

- Hostel Commissioning Plan

The Council is developing a Hostel Commissioning Plan (HCP) 2016-2019 which is subject to approval by the Mayor in July 2016.

- Homelessness Partnership Board

The Council will reform its Homelessness Partnership Board drawing on the expertise of Housing Association, voluntary sector and other statutory partners such as the health services to oversee the production, delivery and monitoring of the action plan.

Action 11: Refresh our Homelessness Statement and align it with the 2016-21 Housing Strategy.

Action 12: Reconvene the Homelessness Partnership Board

Section 3 – Reviewing the Homelessness Statement 2013-17

The council currently has in place a *Homelessness Statement 2013 to 2017* which sets out our approach to preventing and reducing homelessness focused on:

- Homeless prevention and tackling the causes of homelessness
- Access to affordable housing options
- Children, families and young people
- Vulnerable adults

Many aspects of this document are still relevant particularly those related to partnership working and prevention but over the next 12 months we will consider what other options are available to prevent and meet homelessness demand. In addition this strategy will also review the Council's approach to meeting its statutory accommodation duties to homeless households as set out above.

There will be an emphasis on ensuring the most vulnerable and marginalised groups who face homelessness can continue to be assisted linking their support into their health needs, education and employment chances and overall wellbeing.

Section 4 - Options to refresh the current Homelessness Statement to inform the development of the council's 2016-21 Homelessness Strategy

The themes to the council's approach are based on those previously adopted in the Homelessness Statement adopted in 2013. In that document was set out our overall approach to meeting homelessness needs and preventing its causes in the borough.

Aim

The overall aim of the statement is to tackle and prevent homelessness in Tower Hamlets. This includes:

- Preventing homelessness
- Supporting those who are homeless or at risk of homelessness
- Providing accommodation for homeless households

An important additional tenet to the final Homelessness Strategy will be a stronger focus on:

- Reducing the net number of people in Temporary Accommodation

Principles

Throughout discussions with partners there were common ways of working highlighted as being crucial to our achievements thus far as a partnership, and would be even more important in light of the new challenges and opportunities facing the borough. These ways of working have been grouped into three interdependent principles. These principles are intended to guide how we work together as partners, and as individual organizations, to prevent homelessness and provide services for homeless people. They are based on a recognition that the causes of homelessness are complex and multifaceted and therefore need a multifaceted approach. The principles are:

- Multi-agency working
- Early intervention
- Building resilience

An additional principle for the Homelessness Strategy that is finally adopted is:

- Increased property interventions

This has been added because the council needs to diversify its temporary accommodation portfolio and reduce the general fund costs associated with the supply of temporary accommodation.

Multi-agency working - The Homelessness Strategy is a partnership statement: multi-agency working is therefore paramount to the implementation of the statement. Taking a multi-agency approach to service provision is about agencies working together to better understand the needs of, and achieve the best possible outcomes for, families and individuals. As a partnership this will require us to actively share and make better use of information, expertise and resources to provide seamless, holistic services for homeless people and those at risk of being homeless.

Early Intervention - There is a growing body of evidence at the national and local level pointing to the importance of intervening early to improve outcomes for service users and

reduce costs to services. As a partnership, we are committed to taking a proactive approach to homelessness and moving away from simply reacting to crisis, both from a preventative perspective as well as in providing support services for homeless households.

Building resilience - The weakening of welfare support and a continually challenging economic climate will place increasing pressures on households and the ability of services to respond to growing needs. A key aspect of our approach to homelessness needs to centre on assisting people to be better able to assist themselves and take control over their own lives.

It is a commitment by partners to support and empower people and families to develop the skills, competencies and resources needed to successfully respond to challenges, be they economic, social or personal, and avoid reaching crisis point. It therefore requires a recognition and understanding of the multi-dimensional issues that make it difficult for people to cope with life events.

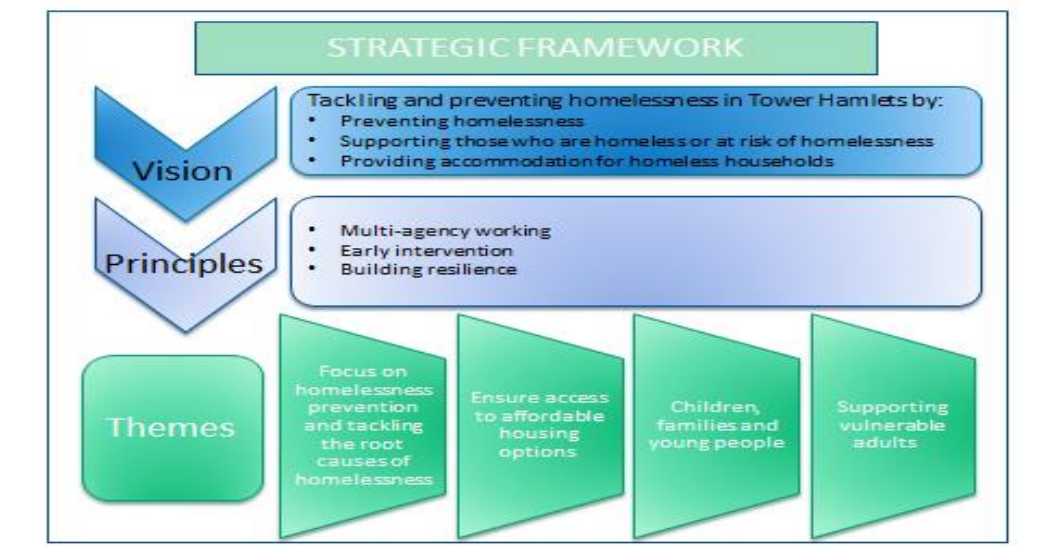
Increased property interventions – Means the council increasing and widening its portfolio of affordable temporary accommodation.

Themes

Using the findings from the evidence base and consultation with agencies, four key themes or strategic objectives have been identified as the basis of structuring the new Homelessness Statement, each with its own thematic objectives:

- Focus on homeless prevention and tackling the root causes of homelessness
- Access to affordable housing options
- Children, families and young people
- Supporting vulnerable adults

In diagrammatic terms, the approach can be illustrated as follows:



Theme 1: Homeless Prevention and Tackling the Causes of Homelessness

Objectives

Provide quality, timely and accessible information and advice focused on homeless prevention and support by:

- Ensuring that there is clear and consistent information at all key contact points for homeless households and those at risk of being homeless.
- Improving the quality and accessibility of housing and homelessness advice services and pathways.

Support people to remain in their homes by:

- Working proactively with social and private landlords to identify and support people at risk of losing their homes and assist tenants to maintain their tenancies.
- Providing advice and support for people at risk of losing their homes.
- Providing financial inclusion and income maximization advice and support for residents, particularly those at risk of losing their homes.
- Mitigating where possible the impact of welfare reform on homeless and formerly homeless people.

Address the root causes of homelessness as part of a partnership approach to tackling worklessness and exclusion by:

- Providing employment support and pathways to employment for households at risk of homelessness and exclusion.
- Strengthening strategic commitment and joint working on homelessness prevention and exclusion.
- Making better use of information and intelligence across the partnership to tackle homelessness and exclusion.

Theme 2: Access to Affordable Housing Options

Objectives

Increase the supply of housing across all tenures by:

- Working in partnership with housing providers and developers, to continue to provide new affordable homes.
- Identifying potential funding opportunities to develop new council homes.
- Bringing empty properties back into use.

Develop innovative and sustainable housing options in the private sector by:

- Improving the accessibility of the private rented sector as a continued opportunity to prevent homelessness, recognising that caps on Housing Benefit allowances influence affordability considerations
- Ensuring that the private sector offers safe and good quality housing options
- Creating a council-owned housing company to provide accommodation including both new build homes and existing properties.

Maximise the use of the existing social housing stock by:

- Ensuring that the common housing register allocation scheme reflects need and availability of accommodation
- Using general needs social housing as temporary accommodation

Ensure that there is a sufficient supply of appropriate temporary accommodation and reduce the time spent in temporary accommodation by:

- Developing a sustainable approach to procuring temporary accommodation.
- Supporting homeless households in temporary accommodation to secure settled accommodation.
- Adopting a Hostel Commissioning Plan for 2017-20 (subject to approval by the Mayor).
- Exploring the potential of purchasing accommodation to meet emergency housing need.
- Developing a portfolio of affordable temporary accommodation.

Theme 3: Children, Families and Young People

Objectives

In order to prevent families and young people becoming homeless, and provide appropriate support packages for those who do, we will:

Prevent homelessness among families and young people as part of an integrated approach to youth and family services by:

- Improving joint working across agencies to focus on homelessness prevention and early intervention for families and young people.
- Improving the use of mediation and respite to address family breakdown as a cause of homelessness.

Support homeless families and young people to be safer, healthier and emotionally and economically resilient by:

- Providing better support services for homeless families.
- Support homeless young people to achieve their full potential and positively progress to adulthood.

Theme 4: Vulnerable Adults

Objectives

In order to provide targeted support for vulnerable homeless adults and support them to live independently, we will:

Better identify the needs of vulnerable people through a personalised, multi-agency approach by:

- Improving the assessment of vulnerable adults, particularly those with multiple needs.
- Ensuring that structures and processes are in place to support a multi-agency approach to assessing vulnerable adults.

Address and reduce the support needs of vulnerable homeless people to enable them to live independently by:

- Developing a joint commissioning approach for homeless adults with complex needs, including substance misuse and mental health
- Having no new people spending a second night on the streets for rough sleepers and reduce the number of people who are living on the streets.
- Providing emergency accommodation to no priority need homeless clients for the purposes of preventing or reducing rough sleeping
- Improving move-on options for people in hostel accommodation and independent living skills of homeless people.
- Ensuring victims of Domestic Violence are supported and their housing needs are met.
- Supporting sex workers in their transition to a safe exit.
- Supporting ex-offenders to keep their homes or find suitable accommodation on return from prison.

October 2016

2016-21 - Private Sector Housing Strategy Outline

Index

Section 1 – Reasons for a Private Sector Housing Strategy

Section 2 – Context

Section 3 – The council’s role

Section 4 – Issues to be addressed

Section 4.1 - Landlord Licensing Schemes

Section 4.2 - Housing Conditions: Investigation and Enforcement

Section 4.3 - Letting and Managing Agents: Enforcement

Section 4.4 - Housing conditions and affordability: engagement and support for landlords

Section 4.5 - Promoting the rights of private tenants

Section 4.6 - Housing Conditions: Private Sector Housing Renewal Policy

Section 4.7 - Empty Homes

Section 4.8 - The Right to Manage

Section 4.9 - Institutional Private Sector Landlords

Section 4.10 - Improving Joint Working

Section 1 – Reasons for a Private Sector Housing Strategy

The private rented sector is now the largest segment of the local housing market, making up 39% of the housing stock in Tower Hamlets. And it is still growing. While private renting works well for some, not least as a short-term option, it is increasingly the *only* option for people who want to rent a home in the social sector - or to buy a home, but can't save for a deposit because private rents are so high. Part of the housing strategy is about creating more choice for such households, but we also need to ensure that the standards of accommodation for people in private rented housing are good – not only by weeding out the bad landlords and agents who give the sector a poor reputation, but also by working to professionalise “amateur”, “accidental”, and small landlords, supporting them to provide decent, well-managed homes to their tenants. Whilst many private rented homes in Tower Hamlets are in good condition and well-managed – particularly in the generally expensive new-build blocks – too many are not.

The private rented sector has become unaffordable for many Tower Hamlets residents. Median rents have increased by a quarter in the last five years. Nearly half of all households in Tower Hamlets have a monthly income less than £2,500; median rents for a two bedroom flat are £1820 a month. For the most economically disadvantaged, the situation is even starker: from October 2016 the total income - including for housing costs - allowed to a workless family with children will amount to less than the median rent of a two bedroom flat in the borough.

The private rented sector can be insecure as well as expensive – tenants typically have just six month tenancy agreements. And there are still landlords and agents who do not respect the rights their tenants have, and tenants who do not understand or cannot enforce those rights.

Around 15,000 ex-council homes were bought under the right to buy. An estimated 6,000 of these are now being let, usually as Houses in Multiple Occupation, by private landlords. In some instances this has led to serious overcrowding and anti-social behaviour such as noise nuisance fly-tipping, and drug-related criminal behaviour on estates owned by the council and its housing association partners. We will work jointly with our partners to tackle these issues.

Many reasons lead to the scandal of empty buildings during a housing crisis - from “buy to leave” investment through to bankruptcy and inheritance. Some buildings have been neglected for years and have a damaging impact on their local area; and there are over a thousand “second homes” in the borough. Alongside this, the Council has concerns about the increasing impact of Airbnb-style short-term lettings on the availability of homes.

There are many vulnerable owner occupiers and tenants in the borough living in poor housing conditions. Many disabled people need help adapting their home in order to live more independent, safe and healthy lives. The Council's Private Sector Housing Renewal Policy 2016 – 2018 makes available a mix of grants and loans to owner-occupiers, tenants and landlords, and we will build on this to improve partnership working over the next five years.

We need to work in a more joined-up way on private housing, both internally and with community partners. The Private Housing Strategy puts in place structures, protocols, forums, partnerships, and relationships that will enable that to happen.

The purpose of this document is to set out in more detail what options are being considered to raise the standard and accessibility of private housing in the borough.

Section 2 - Context

- The 2011 census shows that Tower Hamlets had 67,209 homes in the private sector; 41,670 (62%) of these were in the private rented sector.
- Private rented is now the largest tenure in the borough with 39% of the housing stock. The London average is 25%.
- Lower quartile rents in the borough are £365 per week for a two bedroom and £462 for a three bedroom flat. The weekly Local Housing Allowance rate for a family needing two bedrooms is £302.33, and for three bedrooms it is £354.46.
- The median rent for a room in a Tower Hamlets shared flat or House in Multiple Occupation is £147 per week. Single people under 35 have a weekly Local Housing Allowance of £102.99.
- Median rents have increased by around a quarter in the last five years, to £1430 pcm (£330 pw) for one bedroom and £1750 pcm (£403.85 pw) for two bedroom flats.
- As of 2013, very nearly half of all households in Tower Hamlets have an annual income less than £30,000.
- From autumn 2016 a workless family with children will receive benefits of no more than £384.62 per week to cover rent and living expenses.
- In spite of market conditions, the Council's Housing Options and Assessment service were able to incentivise private landlords to let to 30 low-income households facing homelessness in 2015-16.
- 19,783 households are waiting for affordable housing on the housing register – all are either homeless or in unsuitable housing.
- 4,595 properties in Tower Hamlets have been empty for more than a year. Of these 2,963 are residential properties; 1,632 are commercial.
- Around 16% of private properties are over-crowded; 39% are under-occupied.
- Approximately half the leasehold stock sold under right to buy is now privately rented.
- Approximately 37% of the private stock was built after 1990.
- 19% of the borough's stock failed the decent homes standard in 2011 compared with 35.8% nationally
- Approximately 350 Houses in Multiple Occupation (HMOs) are licensable under current statute.
- 30% of all category one hazards are in HMOs.

Section 3 - The Council's Role

The Council's functions in relation to private sector housing are carried out by a number of different sections who cover enforcement, grant processing, procurement of temporary accommodation and housing advice.

The Council will work corporately to develop a coherent private sector housing strategy that guides all the work taking place across the Council in relation to private housing across all sectors:

Tenure	Intervention	Section
Private ownership and unoccupied	Empty Homes	4.7
Private owner-occupied including on leasehold	Housing Conditions: Investigation and Enforcement	4.2
	Housing Conditions: Home Improvement Grants	4.6
	The Right To Manage	4.8
Privately owned and let: Private rented sector	Housing Conditions: Landlord Licensing Schemes	4.1
	Housing Conditions: Investigation and Enforcement	4.2
	Housing conditions and affordability: engagement and support for landlords	4.4
	Letting and Managing Agents: Enforcement	4.3
	Promoting the rights of private tenants	4.5
	Housing Conditions: Home Improvement Grants	4.6
	The Right To Manage	4.8
	Institutional Private Sector Landlords	4.9

Section 4 – Issues to be addressed

4.1 Landlord Licensing Schemes

The Council wants to use landlord licensing to tackle anti-social behaviour associated with private renting, deal with poor housing standards and assist in improving the overall management of private rented accommodation.

Alongside investing and enforcing health and safety standards in private sector housing (see below, 4.2), the Council's **Environmental Health and Trading Standards service** manages landlord licensing.

4.1.1 Selective Licensing

The Housing Act 2004 as amended by a 2015 Statutory Instrument gives Councils the power – subject to appropriate local consultation - to introduce a selective requirement for landlord licensing in areas with a high proportion of properties in the private rented sector, provided that the area covers no more than 20% of housing stock in a housing authority area.

Following successful consultation, the Council is introducing selective licensing from 1 October 2016 for all private landlords in the following areas:

- Spitalfields and Banglatown
- Weavers
- Whitechapel

The selective licensing scheme will require all private landlords in these areas to apply for a license. The application will be assessed by an environmental health officer, and the landlord's property may be visited and assessed. The licence holder and property manager will need to meet the 'fit and proper' person requirement. If a licence is issued its conditions must be followed. These relate to gas, fire and electrical safety, and proper management.

The current selective licensing scheme ends on 1st October 2021.

4.1.2 Mandatory Licensing

The Housing Act 2004 requires all landlords of larger Houses in Multiple Occupation (HMOs) to be licensed by the Local Authority. Mandatory licensing applies to HMOs that comprise three or more storeys with five or more occupants forming two or more households.

Mandatory conditions apply to these licences. These relate to gas, fire and electrical safety, and proper management.

250 HMOs in Tower Hamlets have been licensed under mandatory requirements. Between 50 and 100 HMOs are required to have a licence but do not.

CLG has consulted and is now considering whether to extend the scope of mandatory licensing, either to HMOs with two storeys or to all HMOs containing five or more people.

4.1.3 Additional Licensing

Many HMOs in the borough do not fall under the current provisions of the mandatory licensing scheme. These include a significant proportion of former Council stock sold under Right to Buy and now let by the room to multiple families and to young people. With a lack

of affordable homes, the impact of welfare reform, and increasing private sector rents, it is likely that many households will adopt this tenure in order to remain in Tower Hamlets.

The Housing Act 2004 allows Local Authorities to impose additional licensing on HMOs beyond the mandatory regime where the Local Authority believes that a significant proportion of HMOs are poorly managed and giving rise to problems for residents or the general public.

The use of additional licensing must be consistent with the Local Authority's housing strategy and should be co-ordinated with the authority's approach on homelessness, empty properties and antisocial behaviour.

The Act requires that any such scheme is approved by the Secretary of State: however, a general approval was issued in 2010, provided there is a minimum 10-week consultation period.

4.1.4 Sanctions and Powers

Licensing will improve the Council's ability to engage with private landlords, and to drive up standards in the sector without the need to take enforcement action.

However, where a landlord obliged to have a license under any of these schemes either does not have a licence or does not comply with its requirements, the Council has powers to impose sanctions:

- A failure to licence a licensable property is an offence, and can result in an unlimited fine
- A breach of licensing conditions is also an offence, and can result in a fine of up to £5,000
- Where a magistrate imposes sanctions, the fine can be unlimited

- Rent Repayment Orders require unlicensed landlords to repay up to 12 months' rent – in the case of rent paid through universal credit or housing benefit, this would be returned to the council. Detail on this is given below, at 4.2.2.

Unlicensed landlords who are required to have a licence lose the right to serve notice on tenants requiring possession under section 21 of the Housing Act 1988 until the property is licensed.

There is also potential for additional action against rogue landlords who avoid **council tax**, for example by fraudulently transferring liability to HMO tenants. The Council Tax (Liability for Owners) Regulations 1992, provides that the owner of an HMO is liable to pay council tax rather than the occupiers, for any dwelling which was originally constructed or converted for occupation by people constituting more than one household – or is occupied by two or more people each of whom is a tenant or has a licence to occupy.

The Environmental Health and Trading Standards service is currently unable to access the council tax and housing benefit data it requires to identify HMOs and unlicensed landlords.

4.1.5 LANDLORD LICENSING SCHEMES: ACTIONS

- Develop plans to provide additional resources on a cost-neutral basis in order to enforce Rent Repayment Orders, Banning Orders, Council Tax compliance, and licensing
- Keep the selective licensing scheme under comprehensive review and provide a full evaluation ahead of 2021.
- Develop an incentive package to engage licensed landlords and agents to help them manage their properties more effectively. This might include e-bulletins, information and training sessions, energy efficiency schemes or a local landlords' forum and customer panel.
- Apply for an extension to the selective licensing scheme from October 2021 in either its initial or amended form.
- After the CLG reach a decision on whether to extend the scope of mandatory HMO licensing, the Council will consider introducing an additional licensing scheme for Houses in Multiple Occupation either across the borough or in specified areas; and to apply this either to all HMOs or to certain types of HMO.
- Ensure that Council Tax and Housing Benefit data is readily available to the Environmental Health and Trading Standards service in order to facilitate the identification of landlords and HMOs
- Carry out a stock condition survey of the private rented sector in order to better inform Council decisions and actions on improving the sector
- Obtain data from East End Homes, Tower Hamlets Homes and Poplar Harca on leasehold properties; and on which of these are rented privately.
- Require landlords who breach licensing conditions to attend The London Landlord Accreditation Scheme
- Develop regional and sub-regional partnerships on licensing, including in relation to enforcement

4.2 Housing Conditions: Investigation and Enforcement

Alongside licensing schemes, the Council has a range of existing and new powers with which to tackle rogue landlords and enforce acceptable standards in the private rented sector. Making full use of these powers will have resource implications, especially during the first year. Over the medium and longer term, the financial penalties the Council can now levy on rogue landlords will allow additional enforcement to be cost-neutral.

4.2.1 Disrepair and poor housing conditions

The Council has a duty to keep the housing conditions in its area under review in order to identify and remedy conditions that are a health hazard or a statutory nuisance.

This duty is discharged by the Council's **Environmental Health and Trading Standards service** through inspection, enforcement, regulation, advice, and education. These service works across areas including pest control, the enforcement of legislation dealing with accumulations of rubbish and other statutory nuisances, noise nuisance enforcement and control, as well as housing safety and standards enforcement.

The Housing Act 2004 introduced the **Housing Health and Safety Rating System (HHSRS)**, a risk assessment and methodology for Environmental Health Officers inspecting and assessing housing conditions. The principle of HHSRS is that any residential premises should provide a safe and healthy environment for any potential occupier or visitor.

Where Category 1 hazards exist the council is obliged to take action to ensure elimination of that hazard.

There are several enforcement options available where hazards are identified. In the first instance, in most cases the appropriate response is to give advice and inform. The Enforcement Officer takes formal action against landlords who deliberately operate outside the law. The Council charges a fee of £474 for each notice served.

The Housing and Planning Act 2016 has introduced new powers to apply for a **Rent Repayment Order** where a landlord has failed to comply with improvement notices or prohibition orders issued under the Housing Act 2004.

The **Deregulation Act 2015** aims to end the phenomenon of landlords carrying out "revenge evictions" where tenants complain about poor conditions – but only if the Council serves notice in relation to a category 1 or 2 hazard. This may increase the number of requests made to the Council to inspect premises using the HHSRS, further increasing demands on very limited resources.

The Environmental Protection Act 1990 imposes a duty on every local authority to inspect its area for statutory nuisances, to investigate complaints of statutory nuisance, and to take action where statutory nuisance exists or is likely to occur. Statutory nuisance is defined as occurring where "any premises in such a state as to be prejudicial to health or a nuisance".

Where the Council identifies statutory nuisance, the first formal step is an abatement notice giving a clear timescale within which the nuisance must be remedied. The Council can prosecute for contravention or non-compliance with the notice, or can carry out 'works in default' with costs recoverable from the person served with the abatement notice

The Defective Premises Act 1972 imposes a duty of care to see that people are reasonably safe from injury or damage to their property resulting from defects.

The Prevention of Damage by Pests Act 1949 gives the Council a duty to try and keep the area free from rats and mice. The Council can serve notice on owners and occupiers specifying treatment and/or works. Under the Act, the Council has the power to enter premises to inspect or enforce notices, including the carrying out of treatment or works.

4.2.2 Rogue landlords and rogue agents

A minority of landlords and agents deliberately profit from leaving tenants to live in rundown, unsafe, or overcrowded properties, or intimidate and threaten tenants. The Council is committed to tackling these rogue and criminal landlords.

The Proceeds of Crime Act 2002 gives powers to seek confiscation orders against convicted individuals requiring payment to the state based upon the benefit obtained from their crimes. Successful actions resulting in very significant financial penalties have been taken by other Councils for poor conditions, planning breaches, and failure to comply with improvement notices.

Rogue landlords, tax and mortgages: The conditions of many mortgages do not grant mortgagees the permission they need to let their property. Rogue landlords may be letting in breach of their mortgage conditions – which could lead to repossession. Rogue landlords and agents may also withhold information about rental income from HMRC.

Protection from Eviction Act 1977: The Council can prosecute criminal offences of harassment and illegal eviction. **The Local Government Act 1972** also empowers authorities to prosecute where landlords or agents have used violence to enter premises or committed harassment. Conviction can lead to an unlimited fine and two years in prison. However, prosecutions are rare as they are complex and may not be in the Public Interest.

Criminal Law Act 1977: It is an offence for any person, including a landlord or agent, to use violence or the threat of violence to enter premises. A landlord or agent may be a trespasser on their own property where they have not followed correct legal procedures before entering: on this basis, a tenant who has been unlawfully evicted is a “displaced residential occupier” and is authorised under the Act to force entry back into the property.

The Council’s Housing Advice Team helps re-instate tenants when they have been unlawfully evicted by applying to Court for an injunction and/or giving financial assistance to the client to pursue their right of re-entry as a lawful occupier.

Protection from Harassment Act 1997: the Act generally prohibits a person from “pursuing a course of conduct which amounts to harassment of another; and which s/he knows or ought to know amounts to harassment”. The Act creates an arrestable offence of harassment, and it is open to tenants to pursue compensation claims.

Restoration of Utilities: If the landlord is responsible for the supply of gas, electricity or water and causes it to be cut off, the Council can arrange reconnection with the suppliers with costs recoverable from the landlords.

Injunctions: An injunction is an order of a civil court directing somebody to do, or not to do, something. The court must be satisfied that the “balance of convenience” is in favour of granting an injunction, and breach of an injunction is an arrestable offence. The Housing Advice service assists in the application for injunctions.

Compensation: The Council’s Housing Advice service refers clients to community partners to pursue claims for compensation against criminal and rogue landlords.

The Housing and Planning Act 2016 introduces a raft of new powers to take action against rogue landlords and rogue agents:

Tenants or local authorities can apply for a **Rent Repayment Order (RRO)** where a landlord has committed offences such as unlawful eviction, harassment, failure to comply with improvement notice, or failure to license where it is required. If successful the tenant (or the authority if the tenant was receiving housing benefit or universal credit) may be repaid up to 12 months' rent. The Secretary of State will make regulations as to how the money recovered will be spent. The Act puts local authorities under a *duty* to consider applying for rent repayment orders where a person has been convicted of an offence. The Act also gives local authorities the power to help tenants apply for rent repayment orders.

Though there are clear resource implications in enforcing RROs, these are likely to be offset by potential revenue gains from successful enforcement. Alongside resources, the Council needs to delegate clear responsibility for these applications.

The Act creates a new '**banning order**' concept enabling a First-tier Tribunal to ban a landlord or agent for a minimum period of 12 months from letting or managing accommodation. The banning order can be requested by a Local Authority against a landlord or agent who has committed a banning order offence. The scope of what constitutes such an offence will be defined in regulations. The local housing authority can impose a financial penalty of up to £30,000 for breach of a banning order. The Secretary of State may by regulations make provision about how local housing authorities are to deal with financial penalties recovered.

Database of rogue landlords and rogue agents: The Act sets out that the Government will operate a database of 'rogue' landlords and letting agents. Councils will be responsible for updating the database when banning order offences have been committed and when banning orders are issued, and can use it to help exercise their functions.

4.2.3 INVESTIGATION AND ENFORCEMENT: ACTIONS

- Provide additional resources to the Environmental Health and Trading Standards service, including legal resources – aiming over time at a cost-neutral budget - to allow for applications for Rent Repayment Orders, Banning Orders, Proceeds of Crime confiscation orders, and Council Tax compliance
- Allocate clear responsibility for Rent Repayment Order applications.
- Work closely with HMRC and mortgage providers when taking action against rogue landlords and agents.
- Develop closer partnership working with the Police to tackle harassment and unlawful eviction
- Conclude a procedure with legal services for bringing more prosecutions against rogue and criminal landlords and agents
- Coordinate prosecutions and other enforcement work undertaken by and on behalf of the Housing Options and Advice service and The Environmental Health and Trading Standards service
- Publicise actions against rogue and criminal landlords and agents in local media, on the Council's website and in partnership with regional and sub-regional partners.

- Develop formal partnerships and strategies with Registered Providers to address antisocial behaviour and poor conditions on estates associated with right-to-buy landlords.

4.3 Letting and Managing Agents: Enforcement

The **Environmental Health and Trading Standards service** carries out work to regulate letting and managing agents.

4.3.1 Redress Schemes and Complaints against managing agents

Since October 2014 all letting or property management agencies must belong to a consumer redress scheme. Agencies must display and publicise the name of the scheme they belong to. Information about the redress scheme should also be provided to new tenants. The Council is under a duty to enforce these requirements on the agencies in its area and can impose a fine of up to £5,000 for non-compliance. Sums received by an enforcement authority may be used by the authority for any of its functions.

4.3.2 Agency Fees

The **Consumer Rights Act 2015** requires both letting agents and managing agents to display a list of relevant fees in a prominent position in their office and on their website if they have one. Local authority trading standards officers in the area where the agent's properties are located must enforce the Act. The Council can at its own discretion impose financial penalties of up to £5,000 for non-compliance

4.3.3 LETTING AND MANAGING AGENTS: ACTIONS

- Advertise to the public and to agents the requirements for agencies to publicise fees and belong to a redress scheme. Publicity could include the Council website, pieces and adverts in Our East End, posters in public spaces, Ideas Stores, and Council offices, and engagement of community partners.
- Conduct a programme of publicised “spot checks” on agents.
- Set up and publicise clear and simple processes for the public to report non-compliant agents. These could include a web portal, email, SMS, and hotline.
- Provide free or low-cost legal advice to private landlords wanting to end onerous contracts with rogue agents in order to incentivise letting to Housing Options clients.

4.4 Housing conditions and affordability: engagement and support for landlords

As a means of improving the quality of private rented housing across the borough, the Council wishes to improve the quality and professionalism of private landlords. The Council also wishes to increase the supply of affordable privately rented accommodation for the borough's low and middle income residents.

4.4.1 Landlord Accreditation

The Council is committed to supporting the **London Landlord Accreditation Scheme (LLAS)**. LLAS awards accreditation to reputable landlords who undergo training and comply with a code of conduct. It was set up in 2004 as a partnership of landlord organisations, educational organisations and 33 London boroughs.

Accreditation is a condition of access to **Empty Property Grants** (see below, 4.7.4).

4.4.2 Private landlords and homelessness prevention

The Housing Options and Assessment service works with private landlords who agree to let to their homeless prevention clients at Local Housing Allowance rates in return for a package of benefits. This allows the Council to facilitate access to the private rented sector for residents who are reliant on benefits or low incomes.

In spite of market conditions, the Housing Options and Assessment service were able to incentivize private landlords to let to 30 low-income households facing homelessness in 2015-16.

In return for - and as a condition of – partnership, the Housing Options and Assessment service pay for landlords to gain LLAS accreditation.

The Council has a financial incentive scheme operating through Tower Hamlets Homefinder to reward landlords letting to their clients for at least two years.

Landlords' Improvement Grants are available to a maximum of £6000 per applicant to landlords who let property to tenants referred to them by the Council. See below, 4.6.3, for detail.

4.4.3 ENGAGEMENT AND SUPPORT FOR LANDLORDS AND AGENTS: ACTIONS

- Develop an enhanced offer to landlords and property owners in order that more will let to low-income residents nominated by the Council. In particular:
 - Reinstate the landlords' forum
 - Provide landlords with e-bulletins, information and training sessions, energy efficiency schemes and customer panel.
 - Incentivise landlords to join the The London Landlord Accreditation Scheme by developing a wider accreditation condition for access to other council services, benefits and grants for landlords
 - Provide a priority Housing Benefit service to accredited landlords
 - Require landlords who breach licensing conditions to attend The London Landlord Accreditation Scheme

4.5 Promoting the rights of private tenants

In a fast-changing regulatory and legislative context, the Council should take steps to improve private tenants' understanding of their rights and empower tenants to improve conditions in their own homes.

4.5.1 Housing Options and Assessment Service

The private housing advice service, accredited by the Legal Services Commission, offers a free, confidential and independent service to people who live in private sector accommodation in Tower Hamlets. The Housing Advice team deal with issues including rent arrears, disrepair, deposits, and threats of illegal eviction. In addition, the team's The Money Advisers can help to look at the best way to manage debt or direct customers to a partner organisation to assist.

4.5.2 Key legislative change affecting private tenants

The 'Right to Rent': The Immigration Act 2014 introduced the concept of a 'right to rent' and therefore the concept that certain people have no right to rent a home.

Landlords and lettings agents are under a duty to check whether their tenants and prospective tenants have the 'right to rent'.

Currently, only British citizens, EEA nationals, Commonwealth Citizens with right of abode, and people with indefinite leave to remain have an unlimited right to rent.

Certain people have a time-limited right to rent. Where an existing occupier's time-limited right to rent expires, the landlord must report this to the Home Office.

People with no valid leave to enter or remain in the UK – including people whose leave has expired – have no right to rent.

Failure to conduct the often complex checks on immigration status, to report to the Home Office the expiration of an occupier's limited right to rent, or to provide accommodation to a person with no "right to rent" can all lead to a fine of £1,000 per tenant and £80 per lodger, rising respectively to £3,000 and £500 for repeated non-compliance.

There are widespread fears and emerging evidence that some landlords and agents avoid the complexities of checking immigration papers by turning away prospective tenants who they believe may not be British citizens.

The Equality Act 2010 imposes a duty on people when letting or managing premises not to unlawfully discriminate against people on the basis of race, religion or belief. A landlord or agent who refuses to let premises to, or check only individuals they think might not be British or EEA nationals, or not having a right to rent because of their colour, ethnic or national origins will unlawfully discriminate.

The government has published codes of practice to provide statutory guidance to landlords and agents on how to operate non-discriminatory lawful checks.

Recent changes have extended tenants' rights in the following areas:

Retaliatory evictions: Where a tenancy has been granted after 1 October 2015, the Deregulation Act 2015 states that a landlord cannot serve notice under section 21 – the notice allowing landlords to carry out simple "no fault" evictions – if that notice is served following a written complaint from the tenant about the condition of the property *and/or* the local authority serves either an improvement notice in relation to a hazard.

Deposit protection: Deposit protection schemes effectively ensure that landlords cannot unfairly retain tenants' deposits at the end of the tenancy. A landlord must protect their tenant's deposit. Landlords who do not do this are liable to a claim from the tenant for full and immediate return of the deposit plus a penalty, payable to the tenant, of between one and three times the deposit's value. In addition, those landlords cannot use the section 21 notice possession procedure to evict the tenant.

4.5.3 PROMOTING THE RIGHTS OF PRIVATE TENANTS: ACTIONS

- Develop a Tower Hamlets Private Tenants' Charter
- Work with community partners and programme a regular publicity campaign to promote awareness of private tenants' rights - including on the Council website, in Our East End, and through posters in public spaces, Ideas Stores, and Council offices.
- Publish and publicise expectations of how landlords should carry out the 'Right to Rent' checks consistently and fairly to avoid discrimination.
- Engage private tenants including through forums
- Provide tenancy training to homeless households moving into the private rented sector

4.6 Housing Conditions: Private Sector Housing Renewal Policy

The Council has a duty under the Housing Act 2004 to review housing conditions in the borough. Where housing conditions are found to require improvement, assistance can be provided under the terms of Article 3 of the Regulatory Reform (Housing Assistance) Order 2002; however a local authority is also required to have adopted a Private Sector Renewal Policy. **The Private Sector Housing Renewal Policy 2016 – 2018** forms a subset of this document.

The Council's Private Sector Housing Renewal Policy 2016 – 2018 is attached to this document and sets out the Council's position on direct grant funding to owner occupiers and private sector landlords and tenants.

4.6.1 Disabled Facilities Grants and the Better Care Fund

See 5.1, Private Sector Housing Renewal Policy 2016 – 2018.

Disabled Facilities Grant is now contained within the Better Care Fund (BCF).

4.6.2 Home Repair Grants - owner-occupiers

See 4.2 Home Repair Grants, Private Sector Housing Renewal Policy 2016 - 2018

4.6.3 Landlords' Improvement Grants

Landlords' Improvement Grants are available to remove minor hazards from the property. The grants are limited to a maximum of £6000 per applicant in any five year period.

Landlords' Improvement Grants will only normally be available to landlords who let property to tenants referred to them by the Council.

4.6.4 Tower Hamlets Home Improvement Agency

See 5.4, Other Assistance, Private Sector Housing Renewal Policy 2016 - 2018

4.6.6 PRIVATE SECTOR HOUSING RENEWAL POLICY: ACTIONS

- Refresh the Council's private sector housing renewal policy to set out the approach, including to partnership working and the Better Care Fund, over the 2016-21 years.

4.7 Empty Homes

4.7.1 Identifying Empty Homes

As of May 2016, **4,595** properties in Tower Hamlets have been empty for more than a year. Of these **2,963** are residential properties; **1,632** are commercial.

69.8% of the empty residential properties have been empty for more than two years. 39% have been empty for more than five years.

The Council identifies empty homes through council tax and Land Registry records and by facilitating reports from the public, property owners and developers.

A complex range of reasons lead to buildings being left empty. Many are in a neglected state and have a damaging impact on their local area. At the other end of the spectrum, Council Tax records show that nearly half are second homes (1,264 of the 2,963 empty homes).

4.7.2 'Buy to Leave'

There are increasing public and political concerns about "Buy to Leave" properties: properties bought by international investors in order to maximise their return on capital growth and then left empty. It is typically associated with buying off-plan in large developments, with significant representation of overseas investors.

Anecdotal reports suggest that a high proportion of these properties are kept empty, though currently in Tower Hamlets quantitative evidence is lacking.

The GLA's November 2015 economic analysis of London's housing market suggests that international investment is responsible for only a small share of transactions and is likely to have had only modest effects on house prices; on the other hand, it is a phenomenon concentrated in small areas, and international buyers as a proportion of sales in prime central London and Canary Wharf have increased from 23 per cent in 2005 to 40 per cent in 2014.

4.7.3 Short term holiday lettings

London had 23,000 Airbnb listings in 2015: after Paris and New York, the highest in the world. Cities across including New York, Amsterdam, Paris, and Berlin - have taken steps to regulate the market on the basis that it diminishes housing stock, disrupts social cohesion, and strains relationships between landlords and tenants. The Council has no data on the extent of the market in Tower Hamlets, or on whether it has a negative impact on local housing supply or communities.

Under the Greater London Council (General Powers) Act 1973, short-term rentals are subject to a planning restriction making the use of residential premises as temporary sleeping accommodation a “material change of use” for which planning permission is required. The Deregulation Act 2015 introduced an exception to this restriction allowing residential premises to be used for temporary sleeping accommodation for up to 90 nights a year. Owners of properties used for more than 90 days can be fined up to £20,000.

4.7.4 Engagement with owners of empty homes

The Private Housing Investment Team records empty properties on the Empty Homes database and manages casework through the database.

The Private Housing Investment Team contacts owners of empty property to broker the reuse or conversion of empty properties. In many cases this initial dialogue is enough to confirm the owner’s plans for the property, and to encourage those plans to be concluded in a timely manner. The owner is offered information and assistance including:

- **Reduced or zero rate VAT**
- **Empty Property Grants:** See 4.3 Empty Property Grants, Private Sector Housing Renewal Policy 2016 - 2018

4.7.5 Enforcement action against owners of empty homes

Where the Council remains unsatisfied that the property will be returned to use as efficiently as possible, consideration is given to enforcement options.

Where there is a public nuisance, or a recurring or potential statutory nuisance, the Council has a duty to issue an Abatement Notice under s80 of **the Environmental Protection Act 1990**. Responsibility for this action rests with the Environmental Health Team. An Abatement Notice requires the owner to carry out specified works and take any steps necessary to abate the nuisance within specified time limits. The Council can prosecute where an abatement notice has not been complied with, or can carry out works in default and recover costs from the owner.

Where an empty building is dangerous or dilapidated, verminous or unsecured, **the Building Act 1984** gives the Council powers to require the owner to make the property safe or to address the external appearance of the building, or to take emergency action to make the building safe.

Section 215 of the Town & Country Planning Act 1990 provides a local planning authority with the power to take steps requiring land to be cleaned up when it is adversely affecting the amenity of an area. The Council can serve a notice on the owner requiring that the situation be remedied. The Council can commence prosecution proceedings for non-compliance with any Section 215 notice, resulting in a fine not exceeding £1,000. Additionally, or in the alternative, the Council can carry out works in default and seek recovery of costs from the landowner.

The Council has the power to enforce a **Compulsory Purchase Order (CPO)** on a vacant residential property under the Housing Act 1985. The powers do not cover commercial properties. However, this is a power that can only be used as a last resort. The Council must demonstrate that it has taken all steps to encourage the owner to bring the property back into acceptable use, and that the reasons for making a CPO justify interfering with the human rights of anyone with an interest in the property.

A full valuation, a financial appraisal, and risk assessment are carried out wherever CPO is considered. Cabinet approval is needed to initiate formal compulsory purchase of a property. There is currently no budget for Compulsory Purchase Orders

Chapter 2 of the Housing Act 2004 enables the Council to take possession of an empty property and then place tenants in it through an **Empty Dwelling Management Order (EDMO)**.

The threat of an EDMO is intended to put pressure on the owner to enter into constructive dialogue. The first stage in the process is application to a Residential Property Tribunal for an interim order. The tribunal must be satisfied that the property has been empty for at least two years, as well as being vandalised or actively used for "antisocial" purposes, and that there is local support for the use of an EDMO. An EDMO cannot be granted if the owner proves the properties are in the process of being sold.

Once an interim EDMO has been granted, it lasts for up to twelve months, during which the authority works with the owner to try and agree a way to put the property back into use. If no agreement is reached during this time, the authority may make a final EDMO, which lasts for up to seven years. A final EDMO differs from an interim EDMO in that the authority is not required to obtain the owner's consent before finding a tenant for the property.

When a tenant has been found under the EDMO, the rent is paid to the local authority, which is able to recover any costs they may have incurred by taking possession of the property and making it habitable. Any money over and above these costs is to be paid to the owner of the property.

A full valuation, a financial appraisal, and risk assessment are carried out wherever an EDMO is considered, and Cabinet approval is needed to apply to a Residential Property Tribunal for an EDMO. There is currently no budget for EDMOs.

4.7.6 The New Homes Bonus

The New Homes Bonus was introduced in order to provide a clear incentive to local authorities to encourage housing growth in their areas. The Bonus rewards local authorities for each additional new build and conversion. Long-term empty properties brought back into use are also. Each year's grant is paid for 6 years. The Bonus is not ring-fenced.

4.7.7 EMPTY HOMES: ACTIONS

- Put in place clear casework procedures, targets and timescales aimed at reducing the number of empty properties in Tower Hamlets
- Develop an evidence base on "Buy to Leave" properties including through the use of Council Tax and electoral roll data. Against this, assess the viability and desirability of responses including Planning Obligations under Section 106 of the Town and Country Planning Act 1990, and revising Council Tax rates for empty homes.

- Explore the viability of working with a social enterprise in clearly defined circumstances to facilitate the letting of empty private sector properties on a short-term basis to property guardians.
- Gather data and evaluate the impact of short-term rentals.
- Publicise and enforce existing legislation on Airbnb lettings made for more than 90 nights a year.
- Develop a budget to fund Compulsory Purchase Orders and Empty Dwelling Management Orders from 2017/18, potentially working with Registered Providers to fund this work, and incorporating revenues from the New Homes Bonus

4.8.1 The Right To Manage

4.8.1 Private and Housing Association Leaseholders' Right to Manage

The Commonhold and Leasehold Reform Act 2002 provides a right for leaseholders to force the transfer of the landlord's management functions to a special company set up by them – the Right to Manage company. The right was introduced not just as a means of wresting control from bad landlords, but also to empower leaseholders to take responsibility for the management of their block.

The right to manage does not apply where the landlord of any qualifying tenant is a local housing authority: council leaseholders' rights are set out below, 3.8.2.

Leaseholders of a housing association have the right to manage as long as all the other qualifying conditions can be met. This also applies where shared ownership leaseholders have acquired a 100% share from the housing association.

Private leaseholders' right to manage is only applicable if tenants with a lease of 21 years or more comprise at least two-thirds of the total number of flats in the premises. The right to manage is not applicable if different people own the freehold to different parts of the building, there is a resident landlord.

The landlord's consent is not required, nor is any order of court. However, either the landlord or another leaseholder may object by serving a counter-notice: but the right to manage application will be defeated only if a qualifying condition is not met.

4.8.2 Council Leaseholders' Right to Manage

Local authority leaseholders have a collective right to take on the management of the council housing where they live since 1994. Right to Manage Regulations provided for by s27 Housing Act 1985 were introduced in 1994 and revised in 2008 and 2012.

This Right to Manage is exercised by forming a Tenant Management Organisation (TMO) in order to take over housing management services such as repairs, caretaking, and rent collection. Four TMOs manage 880 homes in the borough on behalf of the Council. The Council has a duty to facilitate the exercise of the Right to Manage by their tenants.

4.8.3 THE RIGHT TO MANAGE: ACTIONS

- Provide more targeted advice to leaseholders on the right to manage

4.9 Institutional Private Sector Landlords

The Council supports the emergence of institutional investment and management into the private rental sector, through converted stock and in particular through the development of purpose-built private-rental stock.

The Council will actively explore new partnerships and delivery models to develop high quality market rent housing, especially where it gives opportunities for renting at below median market rent levels.

4.9.1 INSTITUTIONAL PRIVATE SECTOR LANDLORDS: ACTIONS

- Actively explore new partnerships and delivery models to develop new, high quality market rent housing, especially where it gives opportunities for renting at below median market rent levels.
- Consider instituting a separate use category for “Build to Rent” developments
- Encourage Build to Rent schemes that are accessible and attractive to residents and the wider community

4.10 IMPROVING JOINT WORKING: ACTIONS

- Develop a biannual PRS forum, internal joint-working, and information-sharing protocols between Trading Standards, Environmental Health, Home Improvement Team, Housing and Council Tax Benefits (including home visits team), Corporate Anti-Fraud Team, Housing Options and Advice, Planning Compliance, Building Control and Tower Hamlets Homes leasehold services, in particular in relation to:
 - HMO enforcement
 - “fit and proper person” tests
 - subletting of social housing
 - ASB in council leaseholder lettings
 - Rogue landlords database
 - Short-term lets
 - Sham lettings
- Develop shared rogue landlord and agent database for Trading Standards, Environmental Health, Housing and Council Tax Benefits (including home visits team), Corporate Anti-Fraud Team, Housing Options and Advice, Planning Compliance, Building Control and Tower Hamlets Homes leasehold services

- Develop joint-working and information-sharing protocols with registered providers in relation to subletting of social housing, leaseholder lettings, short-term lets, and sham lettings
- Work with universities to prevent sham lettings and social housing fraud.
- Establish annual PRS forum bringing together key internal services and external partners

19 October 2016



LONDON
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HOUSING STRATEGY CONSULTATION REPORT

Building new homes and communities in Tower Hamlets
Housing Strategy 2016-2021

Executive Summary

The *Towards a Housing Strategy* consultation was launched by Mayor Biggs in an article in *East End Life* on 16th May 2016, with a housing survey made available online. The consultation was split into two stages, with the first stage taking place between 16th May and 31st July, and the second stage taking place between 16th September and 10th October.

The first stage of the consultation included the publication of the document '*Towards a Housing Strategy*' which the public were asked to read and comment on and a detailed housing survey available online and in hard format.

The stage one survey saw 411 surveys completed – approximately 65% of these were completed during face to face consultations with officers in the Borough's markets, with the remainder completed on the Council's website.

The data below has been extracted from the survey data recorded. The data received from the survey cannot claim to be statistically accurate in representing the views of the majority of those living in Tower Hamlets; however it does provide a good insight into the key issues concerning people in the Borough which will be valuable for informing the development of the housing strategy.

It should be noted that prior to the consultation being held, the work of the Mayor's Housing Affordability Commission, Somali Task Force and consultation on the Local Plan in late 2015 and early 2016 also provided valuable feedback from across the Borough's communities on a wide range of housing issues.

The second stage consultation included further public meetings, a housing conference, a second survey which was published online, and the Council's draft strategy and actions which the public were asked to comment on.

The stage 2 survey had 55 responses. The statistics and concerns raised are on pages 11-13.

Methodology

The questions in the first stage survey were primarily developed around the findings and recommendations from the Mayor's Housing Affordability Commission which ran from December 2015 to February 2016 and through wider policy discussions with the Lead Members for Housing.

Before the online survey went live, it was tested by Council colleagues in order to ensure it worked and surveys could be submitted without any technical problems arising. The paper survey questions were tested on colleagues who did not work day-to-day in housing, in order to ensure the questions were clear so that residents in Tower Hamlets could understand what they were being asked to comment on. As a result of this, the language used in some of the questions was simplified in order to make it 'less techy'. Survey results were examined in order to ensure they were representative of the demographics of Tower Hamlets.

The second stage survey was created following the key housing concerns people mentioned during the stage one consultation. This survey contained questions which arose following the 'draft actions'.

Events and Consultations

As part of the consultation, Council officers held over a dozen events across the Borough. Officers carried out face to face surveys in markets, idea stores, residents meetings, as well as briefing colleagues, management teams and partners in internal and external meetings. Specific engagement included holding an All Member briefing event, attending the Children and Partnership Board, the Parent and Carer Council, the Interfaith Forum, meeting Housing Options partners, holding three internal staff events, hosting a stall in the reception of Mulberry Place, and attending the Tenants and Residents Federation open meeting. Officers also held a housing conference, and met with the Youth Council.

Notes were taken at each meeting and feedback was recorded. While the majority of feedback was in line with what the Council's proposals are in the publications, some issues were raised which were not. These issues were considered and taken into account in the updated version of the Housing Strategy.

Many other issues raised related to service delivery, operational and partnership matters. These have also been captured and will be used to inform further policy development and delivery of the action plan.

Respondents' profiles – First Stage Consultation Survey

Please note that not all respondents completed the monitoring survey. Therefore, the stats headlines do not add up to 100%.

- Gender of those completing the survey: 49% female, 36% male.
- Landlord: 24% LBTH, 25% HA, 16% PRS, 16% owners, 2% homeless.
- Ethnicity: 28% Bengali, 26% British, 4% white, 3% Black, 1.5% Somali.
- Age Group: 16-24 (6%), 25-35 (23%), 36-45 (24%), 46-54 (11%), 55-64 (10%), 65+ (8%)
- 40% of respondents live in the Borough, while 5% work in LBTH. For the remaining 55% the question was not answered.

Note: *Equalities data for the second stage survey were not collected*

Top 10 Housing Concerns of Residents in Tower Hamlets

The top 10 housing concerns below were recorded from the comments made to officers by the public during the face to face surveys, and from the online survey which gave the public the opportunity to add specific comments.

1	Overcrowding
2	Waiting List (too long)
3	Expensive / high rents
4	Local people should get housing priority
5	Repairs (Poor quality / Take too long)
6	Lack of parking
7	Lack of affordable housing
8	Lack of key worker housing
9	Low household income
10	Affordable rent is not affordable

Examples of Housing Concerns

The comments below are a cross section of comments received during the face to face surveys and online. They are intended to give Members a feel of the type of comments being made by the public on key housing issues. A full list of comments is available for Members should they wish to look at them.

OVERCROWDING

“Teenagers of the opposite sex sharing the same room. For example a teenage boy 16 sharing with a teen girl of 13.”

“I have four girls that all currently share a room. The Council should spend an evening in my home watching how hard it is for my daughters aged 13, 10, 8 and 2 to share one bedroom together with no private space for themselves!”

HOUSING REGISTER

“The waiting list is too long.”

“People jump the housing queue.”

“I think it is really important for the Tower Hamlets Council to strive to house those on the housing waiting list, as it is only fair as some families have waited years. So to try and build more housing which will accommodate for affordable rent will be ideal, so everyone can benefit from it.”

HIGH RENTS

“Many of us cannot afford to pay £250 - 300 per week so I would like to see more homes which is less than £200.”

“The average working family cannot afford a rent of £250-£300.00 per week.”

“The Council need to build new homes that we can afford as many of us do not earn more than £15,000 PA and we cannot afford to pay rent of £300 + per week. Priority needs to be given to those that have medical needs and need a ground floor property. There is a shortage of ground floor properties and these are being given to those who do not even need a ground floor. Old estates and buildings can be refurbished to save money than demolishing and building new build homes.”

“People on housing benefits should not be in prime area like zone 2!”

“Rent is very high and unaffordable. As someone who earns between 18-20k I struggle to pay the rent every month and have to scrape to get by. I find myself in situations where I am having to lean towards borrowing from the bank in order to make it through the month financially. The flat I live in is small and isn't even worth the money I pay for it.”

HOMES FOR LOCAL PEOPLE

“No outer Borough placements and homes for local people.”

“Properties bought by the wealthy as investments at the expense of residents - it is pushing prices up.”

“Only people born and bred in Tower Hamlets should get priority housing.”

“Local people don't get housed. People from the EU come here and get housing priority while we have to go private.”

REPAIRS

“Standard of homes is not good. Not modern.”

“Repairs are a problem - waiting too long and contractors not doing what they say.”

“Amount of time it takes THH to carry out repairs - not good enough.”

“Quality of housing association repairs and services is poor - they should be required to document and evidence management support.”

“Process for repairs is too long - limited options.”

“Make better use of empty properties.”

LACK OF PARKING

“No parking.”

“Public service areas should also be increased including GPs, schools, green spaces etc. - parking should also be considered, it is not enough to say a building is 'car free' - this does not seem to ensure that people cannot gain access to a resident permit, as there seems to be numerous 'work-around' this. The best solution would be to ensure all buildings have parking available at an affordable cost.”

LACK OF AFFORDABLE HOUSING

“Affordable homes allow people to stay in, contribute feel part of their local area. Expensive small private houses and flats create transient, tense cramped areas in this city of ours. That will be the slums of the future.”

LACK OF KEY WORKER HOUSING

“How are local communities being supported with all the new housing such as schools, doctors surgeries and local services? These new apartments create problems with school places and push locals further from their school catchment areas. Why aren't there more key worker builds?”

“How are key workers being supported in the Borough? What about key workers who live in overcrowded conditions for example? What incentive is there for them to continue to teach in London? How are those with median incomes able to pay rising rental rates in tower hamlets or afford homes? They are unable to do either.”

“Housing for key worker staff should be a priority.”

LOW HOUSEHOLD INCOME

“Too many homes feels like those on low income pushed out.”

“The majority of Tower Hamlets is full of families on very low income and those living in poverty. the last thing the Council could do is encourage more higher earning individuals to come and live in this Borough as that will inevitably lead to the social cleansing of the majority of residence that have lived in Tower Hamlets for the entirety of their lives.”

AFFORDABLE RENT IS NOT AFFORDABLE

“Define affordable housing, whom is it affordable too, based on what calculations?”

“These affordable rents are too high for family's to afford. I myself refused a 3 bed flat of £203 a week because we couldn't afford it. Also stop offering family's 9th floors with young babies. It's dangerous and not safe.”

Housing Survey Statistics – Short Survey

The questions below were asked in order to gauge the level of support for the broad proposals of the *Towards a Housing Strategy* document. The survey results reveal that a majority residents support the direction of travel set out in the document.

Survey Question	% of Respondents who think this is 'Very Important'	% of Respondents who think this is ' Important'
Building new Council and housing association homes with rents that people can afford to pay.	82.6%	10%
Building new homes on its own estate for median income households (e.g., a single person or two people) who earn between £30,000 and £45,000 per year - before tax.	46.5%	26.7%
The Council works with housing associations in LBTH to make them more transparent and responsive, to improve the quality and management of housing association homes and will intervene where possible to improve services.	61.9%	22.7%
Using Council land to build new homes as well as modernise Council estates.	67%	20.8%
The Council to work with private landlords to improve the quality and management of private rented housing and take action against bad landlords.	61.9%	23.7%
The Council providing homelessness services to people who are not legally defined as homeless, but who the Council think it is important to give advice and support to.	46.7%	31.3%
Continue to give priority to people in most housing need on the housing register.	66%	19.6%

Long Survey Data:

In addition to the data included in the short survey responses above, approximately 140 people (34% of all respondents) went on to complete the longer version of the housing strategy survey on the LBTH website. Support for the proposals was more mixed than in the short survey particularly in relation to developing homes outside the Borough and some aspects of the proposed changes to the allocations scheme.

Question 1 – The cost of Council and housing association affordable rented homes

	More homes at higher rents	Fewer homes at lower rents	No view
The Council may have to make the difficult decision of deciding whether to have more rented homes at higher affordable rents (closer to the Government's affordable rents which are up to 80 per cent of market rents) and in the region of £250 - £300 per week for a two bed flat or have fewer homes at rents closer to current Council social rents or (closer to the Council's social rents) and in the region of £110 - £150 per week for a two bed flat.	33%	57%	10%

Question 2 – Should we build new homes in lower value areas

	Building new homes in lower cost parts of Tower Hamlets	Build new homes at cheaper rents outside Tower Hamlets	No view
The Council may have to make the difficult decision of deciding whether to build more rented homes at rents close to current Council rents in either lower value areas or perhaps outside of the Borough. Which do you think is most important	60%	35%	5%

Question 3 - A new rental product for median income households

	Agree	Disagree	No View
The Mayors Housing Affordability Commission has recommended that the Council should consider developing homes at higher rents on its own estates for median income households e.g. a single person or two people who earn between 30000 and 45000 - before tax. These homes would be let on a separate waiting list and be built alongside homes at lower rents for people in greater need. Do you agree with developing new homes on estates with a mix of rents which are affordable to local people on different income levels:	58%	37%	5%

Question 4 - Repairing and improving council stock or building new homes on Council estate land

	Repairs and improvements to existing housing stock	Building new affordable homes on Council estate	A mix of both improvements and new homes	No View
Due to the Government's decision to reduce rents by 1 per cent for the next 4 years, the Council will have less money to spend on Council housing, which means there are difficult decisions about where to spend the money that is available. In respect of the Council's housing managed by Tower Hamlets Homes, which of the three options do you think the Council should prioritise?	13%	19%	64%	4%

Question 5 - Improving private rented housing

More tenants than ever before now live in the private rented sector. The Council is introducing a private sector licensing scheme to register private landlords in the east of the borough in the autumn, with the aim of improving services and rooting out bad landlords. What kind of changes would you like to see in accommodation provided in the private rented sector?

	Agree	Disagree	No View
Longer tenancies. Currently most private tenancies are usually for between six months and a year and may not be renewed	71%	13%	17%
More action on bad landlords, for example, landlords who do not carry out repairs or who harass tenants	88%	5%	8%
License private landlords of houses in multiple occupation in the Borough	71%	13%	16%
Have a standard of service, like the London Rental Standard, promoted by the Mayor of London	76%	8%	16%

Question 6 - Meeting homeless households' needs

Homelessness continues to be a major issue in the borough. The Council has a legal duty to meet certain homelessness people's needs – usually the most serious based on the Common Housing Register Allocation Scheme - which may be met using Council or housing association accommodation or using private sector housing.

Others may just be entitled to housing advice. While the Council delivers many new affordable rented homes a year, we still cannot build enough homes to meet everyone's needs. Private rented housing in the Borough is too expensive to house homeless people who are on low incomes. This is likely to mean some homeless people will be placed outside Tower Hamlets on a permanent basis. This means we need to consider radical solutions. The Council is also considering other ways to provide temporary accommodation for homeless people. To meet these needs:

	Agree	Disagree	No View
Should the Council build and / or buy temporary accommodation in the Borough	57%	25%	18%
Should the Council build and/or buy temporary accommodation outside the Borough	46%	40%	13%
Should the Council use suitable private rented housing (and Council and housing association temporary accommodation) to end its Council's homelessness duty?	50%	34%	16%

Question 7 - Allocating council and housing association homes to households from the Housing Register

The Council is also consulting on changes to the Housing Allocation Scheme in as part of the consultation on the draft Housing Strategy. The Scheme sets out the rules that decide whether an applicant can join the Common Housing Register and what priority band they receive. We are looking at a number of changes. These include:

The Council currently operates a 10 per cent quota for Band 3 applicants who are not in housing need, given the housing demand from other applicants on the register. Do you think we should consider:

	Agree	Disagree	No View
Remove the quota entirely	34%	41%	26%
Reduce the percentage quota to 5 per cent or less which will increase the lets available to higher priority applicants, including homeless families	39%	42%	19%
Reduce the quota and restrict them to 1 beds only which will increase the lets available to higher priority applicants, including homeless families	33%	47%	20%

	About right	Too long	Too short	No view
On the three year continuous residence rule, do you think the length is	50%	15%	24%	11%

	Agree	Disagree	No View
Should we, retain the residency requirement but create a sub-band in Band 2 for cases in housing need but have not lived in the Borough for 3 years continuously.	31%	48%	21%
Should the Council only allow room sharing if children of opposite sex are under 10 years of age	51%	34%	15%

The results from the longer survey demonstrated broad support for the proposals in the *Towards a Housing Strategy* document, however there were mixed responses to the allocations question on Question 7, which have been taken into consideration for the allocations report.

Stage 2 Consultation Survey

The answers given during the first round of consultation were used as a foundation for the questions below. The second stage survey was published on the council's website, with 2,000 postcards distributed across the Borough with the website where the survey was located. The questions also link in with the draft proposals in the housing strategy which was launched alongside the questions below.

Question	Yes	No
1. When the Council proposes to build new homes on estate land, should it consider building homes for market sale to help fund the development of the Council homes for social rent?	32	22
2. On new private developments, the Council has always sought to ensure that both private and affordable housing is developed alongside each other. In exceptional circumstances, the Council can accept a cash payment to build the affordable homes elsewhere, particularly for new build in expensive areas such as Canary Wharf. Do you think the Council should consider accepting cash payments in order to develop more new Council homes in other less expensive parts of the borough and on existing Council land?	29	24
3. Where new Council homes are built on Council estate land, should people who live on the estate get special consideration for smaller homes when they can give up a larger home (note: all applicants will need to be registered as under-occupying on the common housing register)	50	4
4. The Council wants to increase the number of homes for rent and ownership available to working people on incomes (before tax) of between £30,000 and £45,000: should the council give higher priority to key workers such as nurses, teachers, and social workers?	37	18
5. The Government will be introducing regulations that will mean that all Council housing tenancies in the future are likely to be for fixed terms rather than the lifetime tenancies which are currently issued. This is to ensure properties meet the needs of tenants as needs change over time. For example, a tenant might need a three bedroom house for their children but when their children have grown up and/or moved out, the tenant can then live in a smaller house. The 3 bedroom house can then be used for another family with children. If the Council has to introduce fixed term tenancies, do you think a tenancy length of up to 10 years is about right? (Note: For families with children, tenancies could last up to 19 years).	34	20

Public Comments raised with the Survey Above:

Although surely many nurses, social workers, care professionals earn under £30,000?
Due to the high level of graduate unemployment and the level of unemployed graduates in the borough of tower hamlets. Particularly those of ethnic background, the tenure may not be long enough. As to save to move or purchase a home will be very hard and a deposit may take over 30 years to save for.
Fire fighters, NHS workers not just nurses,
I feel that this could mean other, non-key workers, some of whom provide valuable services to the community, remain 'at the bottom of the queue'.
I think we should have priorities according to waiting time and according to registration date. We all are human and we all got the same right.
It is so difficult for our young people to afford a private rented property in Tower Hamlets let alone buy anywhere here. We need to do all we can to keep young families in Tower Hamlets so all options should be explored. This is especially true for key workers. We need them to stay in London so that they can work in inner London boroughs and have a vested interest in the area where they work. Key worker properties can help to keep employees in vital services. I do believe that key worker services should be extended to include ancillary workers in the emergency services i.e. support staff in schools, health care assistants, etc.
Key workers should include, dustmen, recycle workers, bus drivers, underground and train employers, police, sewage workers, Thames water employers etc. Anyone who works to make it possible for London to run smoothly. Anyone working in London with an income below £45,000 should be given priority. Apropos no 5 London private rent is so expensive. Children in a Council flat should be allowed to stay until they are working and earning above a certain amount and want to move, also the Council should give them a home in the area they grew up in if they have to leave. 10 years is definitely not enough if you are going down that road it should be between 30-40 years and they should have the option of staying in their own area. My daughter left school at 18, studied architecture, which is 7 years study, she was 24 when she had finished. I think the whole idea of moving people from their homes is appalling, you are deciding how people run their lives, no room for grandchildren to stay etc. Also it will create other social issues, mental issues, more homeless etc. amongst younger people. Also meanwhile people are living in their home knowing that one day they are going to be asked to leave by the powers that be. I can't believe this is even being talked about.
On 1 market sale is probably inevitable but TH needs to be strict. And I know many developers lie through their teeth about building affordable housing only to retract it in return for cash later in the process, so again being really strict here is key. And, again, if people can be rehoused within their estate that seems ok to me but it must not be allowed to drive people elsewhere - so enforcement should be strict.

<p>Policeman, fireman, junior doctors. Please give honours to the working people of our community. Support the ones who support the community by their work, by paying tax. Stop selling Council homes, right to buy is damaging our community by decreasing available social homes for key workers.</p>
<p>The income should be lesser considering the national minimum wage and the types of jobs many people are now into. The Council should put the interests of low income earners and those willing to make regular payment towards their rent and support families with more demand and sometimes financial debt</p>
<p>The right to buy on housing association properties is very hard to come by but is a vital way for many people to get onto the property ladder. We should be doing more to work with our housing associations to convince them to extend the current right to buy initiative across Tower Hamlets. With the current increases in property prices in Tower Hamlets even with a full reduction someone with the right to buy is still likely not to be able to afford to buy their home. The maximum reduction on right to buy properties should be increased and it should be considered reducing the length of time it takes to qualify for the right to buy. We should be offering a reduction in property prices and rent for long term local residents particularly if they take up employment in the borough and give back to the economy. This will encourage people to up skill themselves as well as attracting skilled workers and entrepreneurs to live and work in TH's.</p>
<p>There is a dearth of open spaces near Whitechapel / Brick Lane area. This needs to be addressed. More people should be allowed the option of moving outside of the Borough, some want to move out, this should be made easier.</p>
<p>Those working within the service and public services industries which are key to the successful functioning of the area, for example security, transport or administration.</p>
<p>Key workers are important as are community workers who are typically on even lower incomes, but also provide important services to the Borough and its residents. They should be prioritised too.</p>
<p>Care workers but not certain that preference can be justified. All roles offer some value and other local people will feel excluded if priority is given to those in the public sector.</p>
<p>Queen Mary University of London (QMUL) consider that an additional 'worker' category should be added to the Draft Housing Strategy to reflect the requirements of specialist staff employed in research and academic roles. These workers are invariably critical to the research, teaching and development undertaken by the Faculties of Humanities and Social Science, Science and Engineering and School of Medicine and Dentistry at the University that benefits the wider community and London's economic base and diversity. Many of these staff are employed for specific research and other purposes who are attracted by the quality and global standing of London's Universities and specifically QMUL. A large percentage of the academics employed at QMUL fall within the defined key worker income bracket, along with a large number of the other key staff employed by the University. QMUL believe that the 'Key Worker' definition should be expanded to encompass this important sector. Indeed, the Greater London Authority, in the last Examination in Public to the London Plan in response to evidence presented by QMUL, acknowledged that specific types of University staff and Researchers would be considered as 'specialist' workers but that support for these sectors should be promoted through local need having regard to local Borough housing strategies. Additionally considering the aspirations of the London Mayor to promote London's Med City and to develop a Life Sciences hub in Whitechapel, together with his recognition of the importance of attracting world leading academics and researchers to London as a global city, the inclusion of this category of workers would help to support these overall aspirations and enhance QMUL's global identity and with it that of Tower Hamlets too.</p>

Youth Council

On 21st September 2016, 31 young people (including Members of the Youth Council) attended a briefing and engagement event in Mulberry Place. The youngsters were split into four teams and there was a general housing quiz, and then a group activity about where each person wanted to be in 5 and 10 years, along with whether they think they would still be able to live in Tower Hamlets (if that's what they wanted). This engagement was particularly useful as it enabled officers to hear the housing concerns about the next generation of tenants in the Borough. The majority of attendees expressed concern that they would be unable to have a house in the Borough due to the high rental / purchase cost, and general high demand due to projected population increase. Young people genuinely enjoyed living in Tower Hamlets and saw their future as remaining living in the Borough.

Housing Conference

On 1st October 2016 a special housing conference was held at the Spotlight Centre. The purpose of this conference was to brief residents on the housing strategy and our proposals, and to let them have their say on the draft actions we have listed.

Almost 100 people attended the conference (including LBTH Officers), and 60 of those stayed until the end. This high level of public turnout on a wet Saturday morning is testament to the importance and concerns people have about the future of housing in Tower Hamlets. As well as discussing the draft Housing Strategy and Housing and Planning Act resident took part in a piece of interactive theatre presented by Card Board Citizens.

Housing Conference Feedback

In each delegate pack handed out to attendees at the housing conference there was a feedback form which attendees were encouraged to complete at the end of the conference. This form was completed by 21 people. The feedback received is detailed below, and is useful as it will enable us to plan future housing events better.

Housing Conference Feedback

What was your main reason for coming to this conference?	
To hear the Council's proposals in the housing strategy	15
To have your say on the new housing strategy	7
To find out about the new Housing and Planning law	6
To ask the Mayor and housing panel any questions	4
To network with others interested in housing	4
To contribute to the panel discussion	1
To attend the break-out sessions	4

Overall, how would you rate the conference? Excellent = 4, Good = 3, Average = 2, Poor = 1	
4	9
3	11
2	
1	

Do you think the Council has chosen the right themes in the strategy?	YES: 17	NO: 0
------------------------------------------------------------------------------	--------------------	------------------

Where did you hear about this Conference?	Email	Cllr Islam / Blake	TRA	Poplar Harca email	Leaflet in local housing office	Resident engagement invitation	Spitalfields HA	Website	TH Fed	TH Law Centre
	6	2	2	1	1	1	1	1	1	1

Overall were you satisfied with the briefing on the housing strategy?	YES: 16	No: 2	Not Answered: 1
If not, please state why	Council should do more to limit planning permissions granted to companies building private, expensive accommodation in TH.		
	Not completely clear what is going to be done - I'll read the strategy		
	Q+A was only on the housing act and not on general affordable housing.		
	It was patronising. Break-out sessions were useful, but talking about how nice the Council is and how tied your hands are when enough has not been done.		

Overall were you satisfied with the breakout discussions?	YES: 13	NO: 1	Not Answered: 3
	More positive explanations on what can and should be done rather than the constraints and limitations		
If not, please state why	It was a bit of a grievance airing session - would have been good to find out what's going to change		
	Too little time on the break out discussion		
	Not clear what to discuss		

Were you satisfied with the cardboard citizens' performance?	YES: 18	NO: 0
	I think it took away from the practical bit and questions on the strategy	
If not, please state why	Excellent and representative of real situation. People need to have an advocate to help and support them.	
	What was the point?	

Overall were you satisfied with the briefing?	YES: 15	NO: 3	Not Answered: 1
	The Council representative did not present their plans to oppose and work around some of the areas where they have options		
	Too short to fully understand it and then to be able to ask any relevant questions		
	There is no definitive act yet		

Housing Conference Breakout Groups Issues Raised

Group 1: Delivering affordable housing, economic growth and regeneration.

- Local capacity – How much can we really build?
- Self-build – What is the Council's approach to site allocation?
- Estate regeneration – Concerns over process, decants, levels of affordable housing returned and disruption
- Development viability – Mistrust of system that allows affordable housing volume to be reduced on the basis of financial viability
- Planning ghettos
- Decent homes then regeneration – Poplar Harca and LBTH – Concern about what the next stage of regeneration will involve
- Economic growth – concern that local people may get left behind
- Keeping hold of land – ensuring the Council is not forced to sell sites here it could build Council housing
- Small sites – Value the contribution that infill developments can bring.

Group 2: Meeting people's housing needs.

- Session concentrate on homelessness and heard first hand from people who are affected by the shortage of suitable housing
- Consideration of the Council's response to tackling homelessness, particularly around quality and location of temporary housing and how long people will remain in it.
- Consideration of allocation scheme and the way households are prioritised for housing
- Recognition of the needs of other groups and the Council's efforts to meet their needs

Group 3: Raising private rented housing standards.

Licensing

- Licensing is a good idea (this from a landlord) – but has been appallingly implemented. We only got a letter last week. It's not been designed for small accidental landlords like us – we don't have enough expertise or information to answer questions like "who does your repairs" – and £500 up front is a lot, too much – we should be able to spread it out over the years.

Rogue landlords - and agents

- Agents are much more the problem than landlords. Agents causing problems.
- Managing agents overcharge tenants – asking £100s just to renew tenancy agreements.
- Agents cause chaos for landlords. Council causes problems by advising tenants to stay until the bailiffs come – makes it hard for landlords to do the right thing.
- It's always a battle dealing with managing agents – no fixed regulations, no oversight.

- Agents give tenants stress, poor service, mis-selling.
- Landlords are stuck with bad agents as much as tenants.
- The new regulations are positive – and nobody knew about them - but they don't go far enough – they can still charge you what they like.

Social Lettings Agency

- Everybody was very supportive of the Council setting up a social lettings agency – start small and then scale up – this is how private business would do it – there are landlords out there who are sick of high fees and would support ethical letting – put it in an agency that just aims to cover its costs – tie it in with wider strategic approach e.g. to CPOs, EDMOs, even consider renting out high value sales to cover costs of Housing Act – we want a good market rent lettings agency, it's OK to start small and it will grow.
- GLA could lead this by franchising social lettings to the Boroughs – GLA could develop the software, infrastructure, overheads and reduce costs like that.

Engaging Private Tenants

- The private rented sector in Tower Hamlets and inner London is increasingly made up of younger people – sharing flats, not registered, not paying bills, not engaging with local community, more churn. Engaging with tenants would be a good thing but young people don't want to give up their time, they just want things fixed and done. And young people live on line – so you need to use that if you want to engage.
- Tenants need more education.
- You need to aim at the websites used by renters - e.g. spareroom.com – you can target on-line ads and Facebook advertising by postcode or "Tower Hamlets" – you could publicise rights and contacts through that and it wouldn't be expensive
- Educating landlords is very important and positive.
- You could offer incentives to RTB landlords – for example allowing them to buy into renewal works such as bathrooms.

Insecurity

- Tenants have to move constantly – I'm trying to be involved in my community but I can't afford to buy and I need a guarantee that when I rent I can stay somewhere for 10-15 years.
- Community Land Trust has been good – but has only been able to help a very small number of people

Airbnb

- Airbnb is a problem causes antisocial behaviour in my block – would be good to do something about it, need to enforce.

Changes to strategy as a result:

- Increase emphasis on working with and regulating agents as well as landlords

For consideration operationally and in action plans

- Amend application process for small landlords
- Consider spreading licensing costs for small landlords
- Look at targeted advertising to promote tenant and landlord awareness
- Engage tenants through online groups
- Feed into considerations of social lettings agency

Group 4: Effective partnership working with residents and stakeholders.**Tenant Rights**

- There were some concerns by attendees about tenant's right in general – particularly if there were mergers.
- There was concern from some residents that when housing associations merge, tenants are kept in the dark. It was felt by some that their needs as residents was going ignored. One person said the large housing associations are not accountable to anyone.
- There was general support to improve the Tenant and Resident Federation, and to assist communities in setting TRF up.

Rents and Accountability

- 1% rent reduction – need to sell void properties and give the money to the Government rather than investing in housing.
- One man said he would like to see Tower Hamlets Homes holding its AGM on time, rather than just relying on public drop in sessions for residents to talk about any THH problems they have.
- One individual said they wanted to see something in law so that landlords could not increase their rent suddenly by a large amount.
- The big saving for the Government would be on housing benefit if they built homes at social rents

Stock

- Some residents expressed their concern at social housing stock being sold off and not replaced.
- RP attendees stated that everybody needs to balance the books and for some that may mean selling off higher value stock.
- The Mayor said he has constantly tried to seek money from the Government and City Hall so that he can build affordable social housing in the Borough.
- Better management of estates was mentioned.

Partnerships

- Concern regarding Poplar Harca privatising the Balfour Tower to fund social housing – residents expressed the need to work better in future.
- One member of the public said the TH Common Housing Register was a unique and solid example of partnership and one which private landlords should consider signing up to.
- The Mayor said he believed Government policy was pointing towards more mergers of housing associations. And work is being done to improve partnerships.



LONDON BOROUGH OF TOWER HAMLETS

Housing Evidence Base

November 2016

Contents

<i>Introduction to the Evidence Base</i>	3
<i>Tower Hamlets Projection Growth Statistics</i>	5
1. Housing Demand	6
1.1 Common Housing Register	7
1.2 Overcrowding	8
1.3 Under occupation	9
1.4 Housing demand for older residents	10
1.5 Homelessness	11
<i>Homelessness Approaches and Preventions</i>	11
<i>Statutory Homelessness Assessments</i>	11
1.6 Profile of households	12
<i>Ethnicity</i>	12
<i>Age</i>	12
<i>Reasons for Homelessness</i>	13
1.7 Housing the Homeless: Temporary Accommodation and Social Lets	13
<i>Temporary Accommodation</i>	13
<i>Bed and Breakfast Accommodation</i>	14
1.8 Demand for specialist accommodation	15
<i>Supported housing</i>	15
<i>Wheelchair and accessible housing need</i>	16
<i>Project 120</i>	16
1.9 Lettings	18
<i>Social Housing Lets to Homeless Households</i>	19
2. Housing supply	21
2.1 Housing Stock	22
<i>Tenure</i>	25
<i>Council owned stock</i>	27
<i>Registered Providers</i>	27
<i>Private Sector Housing</i>	30
2.2 Future Housing Supply	33
<i>Residential Development Projections</i>	34
<i>Student accommodation</i>	35
2.3 Housing Costs	35
<i>Rent</i>	35

Housing Benefit36
Incomes36
Strategic Housing Market Assessment 201437
Source: Tower Hamlets Council Data.....37
Housing Needs Survey.....38

Introduction to the Evidence Base

The London Borough of Tower Hamlets is now the fastest growing borough in the country, with its population expected to increase by a further 22% between 2016 and 2026. The latest figures show an increase of six thousand five hundred people (+6,500) on the 2015 estimate of 291,300 – a percentage increase of 2.2 per cent – higher than the average rise across Greater London (+0.5 per cent) or nationally (England, +0.7 per cent).¹

Within London, Tower Hamlets was – by far – the fastest growing borough, followed by Islington (+9.1 per cent), Camden (+7.1 per cent), Hackney (+13.1 per cent) and Barking & Dagenham (+15.2 per cent).

Between 2001 and 2011 more homes have been built in the borough than elsewhere in the country and the number of households in the borough has increased since 2001 by 29% to 101,300. Tower Hamlets ten year (2015-2025) housing delivery target is 39,314 which equates to 3,931 per year and 9% of the London target, this means Tower Hamlets has the highest housing target of any London Borough.

More than two thirds of the borough's population belong to a minority ethnic group. Whilst the Tower Hamlets continues to be home to the largest Bangladeshi community in the country it is now the 15th most diverse borough in London and the 16th most diverse in the country. After the "White British" group, the third largest ethnic group is now the "Other White" group who account for one in eight of the borough's residents and include a mix of ethnic backgrounds such as Europeans, Australians and Americans.

The most significant change in the borough's population has been the age profile with the borough experiencing a 44.5% increase in the number of residents aged 20 to 64. Working age residents now make up 73.9% of the population.

The average earnings for those in work in the borough is now approximately £58,000 per annum whilst the median household income is £30,379. Around 27,430 (16%) working age residents are in receipt of out of work benefits and Tower Hamlets has the third highest unemployment rate in London as well as high levels of deprivation and child poverty. In terms of housing need the council and other Registered Providers operating in the borough have more than 20,000 households on the common housing register and there are 9,500 overcrowded households.

A report by consultancy Local Futures published in January 2013, confirms that Tower Hamlets is now ranked first in the country in terms of economic performance and there is evidence that the local labour market is once again beginning to strengthen. Tower Hamlets now has an employment rate of 61.9%, the highest since 2004. The 2010 Local Economy Assessment

¹ GLA 2015 Round SHLAA-based Capped Household Size Model Population Projections (July 2016)

confirmed that despite its east London location, the Tower Hamlets economy has characteristics similar to central London locations and is estimated to be around £6 Billion per annum. Tower Hamlets is home to the second largest financial business district in the country which now provides around 100,000 jobs, 40% of the borough's employment. There has also been significant employment growth to the west of the borough in the City Fringe where around 15% of the borough's employment is located. The £20 billion Crossrail project will further enhance the borough's connectivity and increase access to international markets via Heathrow.

However, the borough's central London economy has put significant pressure on its housing market. As of 2014, 39% of all stock in the borough was in the private rented sector, up from 20% in 2003. It is estimated that since 2014 the number of properties in the PRS has continued to increase.

There is strong evidence of international investment in the borough's housing stock and there is intense pressure in the borough to deliver other types of residential accommodation. Tower Hamlets now accommodates almost 7,000 bedspaces of student accommodation.

Following regional rather than national trends, house prices in Tower Hamlets have increased by 34% since 2013 when average house prices were £383,732. The average house price is now £514,828, more than 17 times the median household income and rents are in excess of £1,700 per month for a 1 bedroom flat or apartment.^{2 3}

This evidence base is being published as more data from the 2011 census is released by the Office for National Statistics, as is the borough's 2014 Strategic Housing Market Assessment. This data will provide a more comprehensive picture about the extent of changes in the borough's tenure pattern; household conditions etc. over the last ten years.

The evidence base sets out the information and data required to support a range of housing priorities relating to homelessness, private sector housing, older people and the Tenancy Strategy.

The housing evidence base will also sit alongside the needs assessments informing the council's key strategies relating to the local economy, health, financial inclusion and children and young people, and our housing delivery priorities in the Local Development Framework.

² RightMove Property Prices - <http://www.rightmove.co.uk/house-prices-in-Tower-Hamlets.html>

³ Foxtons - <http://www.foxtons.co.uk/living-in/tower-hamlets/rentals/>

Tower Hamlets Projection Growth Statistics

Population

- *Between 2001 and 2011, the population of Tower Hamlets increased by 254,100, making the Borough the fastest growing place in the UK.*
- *Tower Hamlets is expected to be the fastest growing borough in London and one of the fastest growing local authorities in England over the next ten years. According to GLA projections, the population will rise from 296,300 in 2016 to 374,000 in 2026, a 26 per cent increase.*
- *Between 2026 and 2036, the TH population growth is projected to slow down. By 2031, the borough's population is expected to grow at a slower rate than London as a whole.*
- *Blackwall and Cubitt Town is projected to be the fastest growing ward in the borough over the next ten years, with a 70 per cent increase in its population.*

Ethnicity

- *In 2011 more than two thirds of the population of Tower Hamlets belong to a minority ethnic group (i.e. not White British).*
- *The broad ethnic makeup of Tower Hamlets is expected to remain relatively static, with the proportion of white and Black and Minority Ethnic (BME) residents projected to change little between 2011 and 2031. This differs from the projections for London, which anticipate the proportion of BME residents to rise from 40 per cent to 46 per cent.*

Household Projections

- *In 2011 Tower Hamlets had 101,300 households with an average household size of 2.47 people per household. This was the same average household size as the London average, and slightly higher than the average in England which was 2.36.*
- *By 2021, Tower Hamlets is projected to have a total of 139,600 households living in the borough with an average household size of 2.40 people per household.*

Source: Population Projections for Tower Hamlets, LBTH Research Briefing, January 2016

1. Housing Demand

Housing Register

- There are over 19,000 households on the housing waiting list.
- Of these 53.75 % are in priority categories 1 and 2.
- 7,078 of these households are over-crowded.
- 52.3% of all households on the register are Bangladeshi families.
- 506 residents on the register are under-occupying by two rooms or more.
- There are over 232 households with a need for wheelchair adapted property in category 1a and 1b.

Homelessness

- There are over 1,996 households in temporary accommodation placed by the council.
- In 2015/16 the Housing Options Team made 656 homeless decisions, this is 15% down on decisions made in 2014/15.
- 557 households were accepted in 2013/14, 5% down on 2014/15
- During 2014/15 the Housing Options Team prevented over 672 households becoming homeless
- Although the general trend in homelessness has been downwards over the last four years, these trends have shown an upwards turn across the London region with a 10% increase in homelessness since the third quarter of 2015

Lettings

- Nearly 8,500 homes have been let in Tower Hamlets over the past four years.
- 58% of all homes let through choice during 2015-16 were let to an over-crowded household.

1.1 Common Housing Register

Table 1: Common Housing Register - Demand by Year and Bedroom Category

Bed Category	April 2007	April 2008	April 2009	April 2010	April 2011	April 2012	April 2013	April 2014	April 2015	April 2016
1 bed	9,938	11,159	11,705	11,396	11,152	11,141	11,759	9,042	8,738	8,495
2 bed	4,405	4,600	4,757	4,665	4,976	5,001	5,187	4,497	4,343	4,213
3 bed	4,561	4,368	4,630	4,857	5,215	5,386	5,595	5,124	4,994	4,812
4 bed	821	1,341	1,450	1,447	1,545	1,616	1,663	1,564	1,524	1,426
5 bed +	147	261	247	249	248	241	210	198	184	178

Tower Hamlets changed its Lettings Policy from October 2010 introducing a banding system. Additional priority was given to over-crowded households on the Housing Register. While there has been a continuous decrease in the demand for one bedroom accommodation between 2008 and 2016 – with a slight increase in 2013 – the demand for one bedroom accommodation is now at 2005 levels. By April 2016 there were 19,124 households on the Common Housing Register a decrease of 3% compared to April 2015, and a decrease of 21% compared to April 2013. Around 44% of households are in need of 1 bedroom properties whilst 33% require 3 or more bedroom properties.

Table 2: Historic demand by Priority category

Demand by Community Group	April 2007	April 2008	April 2009	April 2010	New Bands from Oct-2010	April 2011	April 2012	April 2013	April 2014	April 2015	April 2016
CG1	1,364	1,551	1,602	1,568	BAND 1	2,638	2,480	2,364	2,073	1,976	1,849
CG2	2,732	2,857	2,778	2,371	BAND 2	9,457	9,325	9,339	9,225	8,720	8,430
CG3	13,329	14,362	15,076	15,324	BAND 3	7,988	8,471	9,358	9,127	9,087	8,845
CG4	2,447	2,958	3,333	3,351	BAND 4	3,053	3,109	3,353	not used	not used	not used
Total Demand	19,872	21,728	22,789	22,614		23,136	23,385	24,414	20,425	19,783	19,124

Source: CHR database Apr 2016

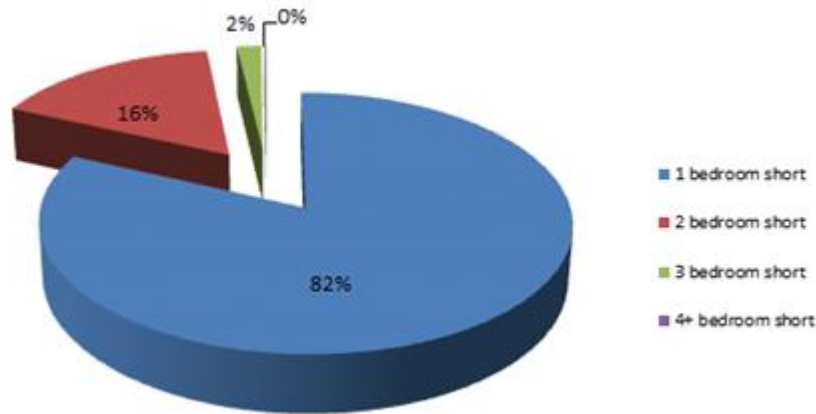
***Note: The drop in number of applicants on the CHR database was as a result of Council's review of the lettings scheme allowed for under the Localism Act in 2012 which meant a number of categories of applicants were no longer eligible to remain or join the Housing Register. [For more information on bandings click here.](#)

1.2 Overcrowding

Since 2009 there has been nearly a 15% reduction in the number of households classified as “overcrowded” on the Common Housing Register. Of the 7,078 overcrowded households, over two-thirds are Bangladeshi families and 79% of overcrowded households require 2 or more additional bedrooms.

Diagram 1: Percentage of Overcrowded households by bedroom need

Tower Hamlets Common Housing Register 01 April 2016:



Source: Tower Hamlets Common Housing Register, Apr 2016

Table 3: Over-crowding by Broad Ethnic Group

Broad Ethnic Group	No. of households	%
Asian/Asian British	5232	73
Black/Black British	648	9
Dual Heritage	117	2
White/White British	746	11
Refused/unknown	95	1
Other	313	4

Tower Hamlets Common Housing Register 01 April 2016

1.3 Under occupation

Welfare Reform changes introduced from April 2013 has resulted in working age social tenants experiencing a reduction of their benefits (LHA) if they are live in housing which is considered to be too large for their household needs. This rule corresponds with existing rules already in place for tenants in private rented accommodation. In Tower Hamlets there are currently 1,333 households registered on the CHR as under occupied and that they are mostly older tenants. Analysis of the CHR shows currently

- There are 1,333 registered under-occupying households
- Over 900 under-occupying social housing tenants are of working age
- Almost 300 of these households are under occupying by more than one room

Table 4: Total number of registered under-occupiers

Excess Beds	
1	1,036
2	252
3	39
4	5
5	1
Total	1,333

Tower Hamlets Common Housing Register April 2016

There are 1,333 social housing residents of working age were registered as under occupied on the housing register. The table below shows the number of bedrooms over need which the household currently has.

Table 5: Working Age Under-occupiers by bed need

Age Groups	Under- occupiers by current bedroom in property							Grand Total
	2 bed	3 bed	4 bed	5 bed	6 bed	7 bed	8 bed	
18 to 25	8	3	2					13
26 to 40	50	41	14	1	2			108
41 to 50	89	102	34	7	1			233
51 to 60	142	163	68	15	4	1	2	395
61 to 65	210	278	73	16	5	1	1	584
Grand Total	499	587	191	39	12	2	3	1,333

Tower Hamlets Common Housing Register 01 April 2016:

These figures only refer to under occupiers registered on the housing waiting list.

1.4 Housing demand for older residents

The last time Tower Hamlets undertook an Older Person's needs assessment was in 2010 when the Council commissioned Trimmer CS to conduct an Older Persons Needs Assessment to support the development of the Older Persons Housing Strategy. As highlighted in the Older People Housing Statement.

As required under national planning policy framework, Tower Hamlets is required to identify future needs of older people in its Local Plan. The work which will be undertaken in the future will continue to help inform the housing strategy.

Table 6 shows the recommended level of housing provision for residents aged over 75 as at 2010.

Table 6: Current and recommended levels of provision of specialist housing for Older People.

Type of housing	Number of units per 1,000 population over 75 years
Current: Provision of traditional and enhanced sheltered housing (rental and leasehold)	136
Proposed: all forms of specialised accommodation for older people, excluding residential care	180
Breakdown of proposed provision:	
Conventional sheltered housing for rent	50
Conventional sheltered housing leasehold	75
Enhanced sheltered housing (divided equally between rent and sale)	20
Extra care sheltered housing (divided equally between rent and sale)	25
Housing base provision for dementia	10

Source: (*More Choice, Greater Voice, DH/CLG, 2005*)
Older Peoples' Housing Needs Assessment, 2011

1.5 Homelessness

Homelessness Approaches and Preventions

Between 2009/10 to 2014/15 around 5,172 households approached the Council as homeless or at risk of being made homeless. The figures for each year have remained relatively stable. An emphasis on prevention in the Homelessness Strategy has led to a notable reduction in homeless applications in the borough.

The Council's Housing Options Service (HOS) works closely with other council services and partner organisations, including third sector agencies, to prevent households becoming homeless. Over 5,100 households were prevented from being homeless as a result of housing advice and support intervention between 2009/10 and 2014/15, exceeding the Council's target for this period.

Table 7: Households prevented from being homeless through housing advice and support intervention

	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	Totals
Target	786	915	856	600	740	690	4,587
Actual	1,079	988	1045	657	731	672	5,172

Source: Tower Hamlets Council data

The majority of homeless preventions are achieved by assisting homeless households to secure alternative accommodation, particularly in the private rented sector (PRS). Initiatives such as the Private Sector Access Scheme play an important role in helping households obtain rented accommodation in the private sector.

Statutory Homelessness Assessments

The number of statutory homelessness assessments (homelessness decisions) has fluctuated since 2008/9, but overall, there has been a significant reduction in homelessness assessments made by the Council. In 2008/9 a total of 946 decisions were made. By 2014/15 with 777 decisions were taken, and in 2015/16 this had reduced to 656 decisions, equating to a 30% reduction over three years.

The number of households accepted as homeless (homelessness acceptances) has also reduced over the same period, from 713 in 2008/9 to 522 acceptances in 2015/16, 27% down on 2008/09.

1.6 Profile of households

Ethnicity

Ethnic minority households in the Borough are disproportionately affected by homelessness, as is the case regionally. In 2015/16 80% of households accepted as homeless were from minority ethnic groups. However, ethnic minority groups account for 69%⁴ of the Borough's population. This is similar to the general housing needs in the borough, with BME households accounting for over 70% of households on the Housing List, and the majority of those that are overcrowded. The Tower Hamlets Strategic Housing Market and Needs Assessment (SHMA) found that BME households are, on average, larger and more likely to be overcrowded.⁵

Asian households are, by far, more likely to be homeless than any other ethnic group in the Borough. Though only accounting for 30% of the population, 59% of households accepted as homeless in 2015/16 are Asian. Black households in the borough are also disproportionately affected by homelessness when compared to the population as a whole. Black households make up 16% of households accepted as homeless, but represent 7% of the Borough's population.

Age

By far the largest age groups accepted as homeless are the 16-24 and 25-44 age groups (with the latter being the largest), though the numbers of acceptances from these groups have dropped significantly – again a reflection of overall reductions in homeless acceptances. Acceptances across most other age groups has also reduced or remained constant. In 2008/9 323 households accepted as homeless (37.9%) were from the 16-24 age group. By 2015/16 the figure was 91 households (17%) of those accepted.

Acceptances for the 25-44 age group has seen a steady decrease. Homeless acceptances for this age group went from 454 in 2008/9 349 (67%) in 2015/16. The number of households accepted as homeless who are 60 or above has also reduced, from 31 in 2008/9 to 11 in 2015/16. Acceptances among the 45-59 age group have increased from 45 in 2008/9 to 71 in 2015/16. The number of homelessness acceptances made as a result of a member of the household having a physical or mental disability has decreased dramatically between 2008/9 from 97 households to 18 households in 2015/6. The percentage of acceptances as a result of vulnerability due to a disability is 3.4%. However, this is the third largest priority need group, behind those with dependent children and pregnant women.

⁴ Population statistics taken from the 2011 Census

⁵ London Borough of Tower Hamlets (2014) Tower Hamlets Strategic Housing Market and Needs Assessment

Reasons for Homelessness

The main known reasons for households being made homeless have changed as a result of the welfare reforms with landlords now requiring their properties back to let on the open market where they can command higher rents than those affordable on benefits and low incomes. In 2012/13, 93 (22%) households were homeless as a result of the ending of their Assured Short-hold Tenancies, in 2015; this figure was 199 (35%)

Table 8: Reasons for Homelessness 2015/2016

Parental ejection	121
Ejection by other family relative or friend	95
Relationship breakdown	16
Domestic violence	50
Other violence	8
Harassment	2
Mortgage Arrears	0
Rent arrears	9
Ending of assured short-hold tenancy	186
Other loss of private sector home	31
Other	16
Total	536

Source: Housing Options Team July 2015 – June 2016

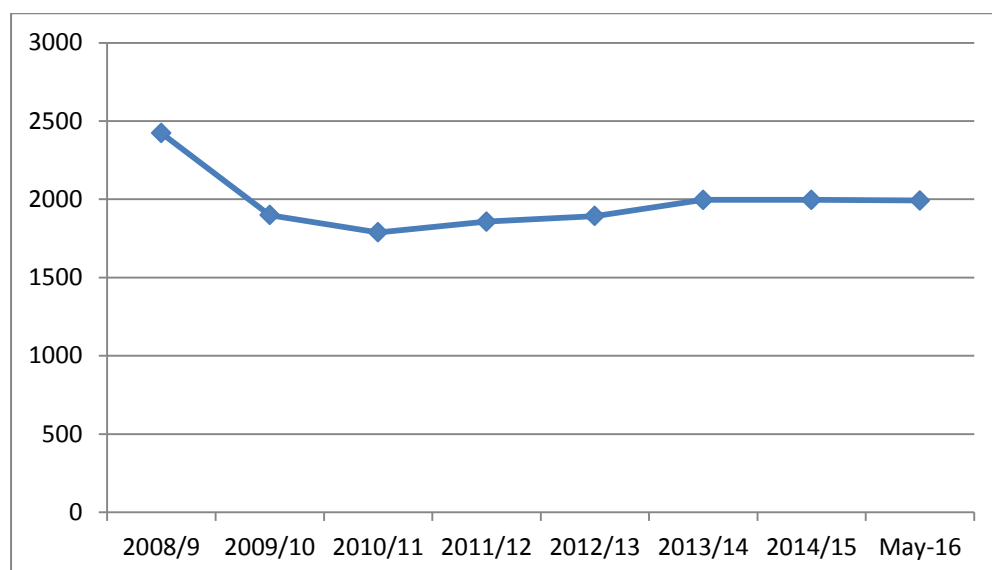
1.7 Housing the Homeless: Temporary Accommodation and Social Lets

Temporary Accommodation

The number of households placed by the Council in temporary accommodation has reduced year on year, from 2,424 in 2008/09 to 1,996 in April 2016.

Following a near year-on-year reduction in households in temporary accommodation, since 2008/09 the number of household in TA is began to flat-line, reflecting the trend in homeless decisions and acceptances. However there has been a slight upward trajectory by June 2014 to April 2016 with 1,996 households were in temporary accommodation This is due to a number of factors; primarily the refreshed lettings policy which has led to significant reductions in social housing lets to homeless households, and an increase in lets to overcrowded families to address the imbalance in the previous lettings policy. Other possible reasons for the increase in Temporary Accommodation include the impact of welfare reform and private sector rents which restrict the number of lettings LBTH can make to those on the housing register.

Diagram 2 Households in temporary accommodation in Tower Hamlets



Source: TH Housing Options, 2016

Of the 1,996 households placed in temporary accommodation in May 2016 by the Council, 1,066 are being accommodated outside the Borough due to the high demand for temporary accommodation, and prohibitive costs of Private Sector accommodation in the Borough. Households with complex needs are so far as possible not housed outside Tower Hamlets.

Bed and Breakfast Accommodation

The number of accepted homeless households placed in Bed and Breakfast (B&B) accommodation has increased between 2009/10 and 2013. As at March 2010 79 homeless households were placed in B&B. By March 2014 this figure had increased to 149; however as of May 2016 the figure had reduced to 113. The increase in the number of households in B&Bs since 2010 reflects the additional pressure on services caused by a reduction in private sector housing, which could be attributed to the impact of welfare reforms.

As of 30th September 2016 there were 29 families with dependent children/pregnant women in B&B, none of these families were housed in a B&B for over 6 weeks, resulting in the Council achieving legal compliance for the first time.

The Council housed 100 adult-only households; some of them rough sleepers who were / are not in priority need, some awaiting a hostel placement, priority need awaiting a permanent offer, or some that have had a negative decision and being accommodated on a discretionary basis pending a review of the decision on their homeless application

1.8 Demand for specialist accommodation

Supported housing

The council is currently reviewing the demand for specialist housing in the Borough including supported housing and hostel accommodation and the evidence collated will be used to inform our priorities. The Supporting People Commissioning Strategy adopted by the council in 2011 sets out how the council and its partners will meet the housing needs of vulnerable people in the borough through the provision of housing related support services.

Vulnerable people include the homeless and rough sleepers, young people leaving care or at risk including teenage parents, older people, people with mental health needs, physical disabilities, learning disabilities, HIV/AIDS, people with substance misuse issues, refugees, ex-offenders and women fleeing domestic violence. Our strategy identifies gaps in provision, particularly

- Appropriate supported housing options for people with learning disabilities, mental health issues and older people; and
- Housing options for those leaving the care system, teenage parents and young people at risk because they are homeless.

There is a need for supported housing in the borough and many vulnerable people are exercising their choice by making supported housing as their preferred housing option. The table below provides a detailed breakdown of totals units by each client group.

Table 9: Supported Housing Provision by Client Group

Client Group	Total Units
Substance Misuse Services	99
Domestic Violence	66
Frail/Elderly	161
Older People – Support Needs	2,254
Generic, Homeless Family Support needs	843
Learning Disabilities	38
Mental Health	430
Refugees	13
Physical/Sensory Disabilities and HIV/AIDS	20
Single Homeless, Rough Sleepers, Ex-Offenders	966
Young people at Risk/Leaving Care, Teenage Mothers	149
Total	5,023

Source: Tower Hamlets Supported People Commissioning Strategy, 2011-16

Wheelchair and accessible housing need

Results from the 2014 Strategic Housing Market and Needs Assessment (SHMA) shows that 20,293 households contained a household member with a disability or limiting long term illness, and 1.7% of households said that they had a support need. Data was also collected about the extent to which the home had been built or adapted to meet the needs disabled persons and what facilities need to be provide. 10.5% of households said that their home had been adapted to meet the needs of disabled household member. Analysis of the council housing waiting list shows that there are 130 households in need of Category A & B wheel-chair accommodation on the accessible housing register. 70 of these households require larger three bedroom plus homes and 30% of households have children with disabilities. All households in this category have the highest priority for re-housing.

Project 120

Project 120 (P120) was started in 2012 and re-launched in January 2014 to address the specific housing needs of families with a wheelchair user on the Council's Housing waiting list. The name stems from the 120 families who were on the Accessible Housing waiting list at that time. Even though our planning policy at the time required 10% of new affordable units to be wheelchair accessible, there was a lack of suitable units in the development pipeline, especially for families with specific mobility requirements.

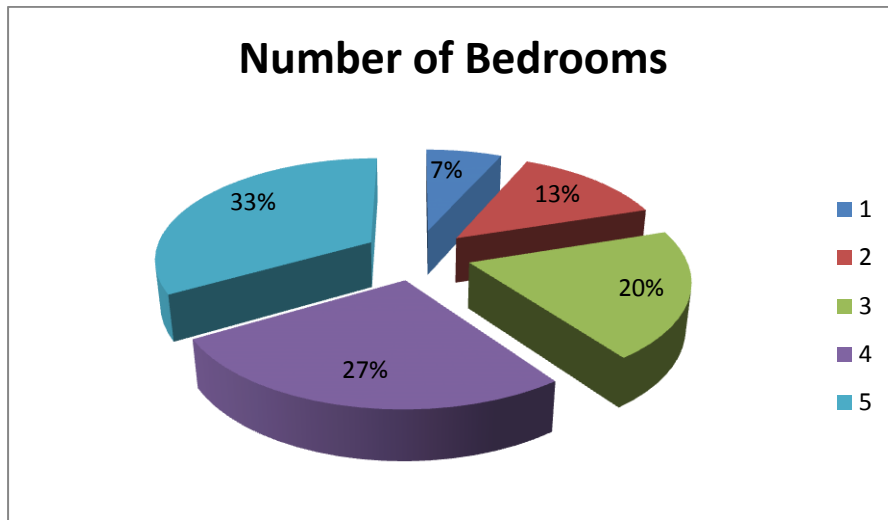
Since April 2015, a further 30 families have been rehoused in suitable properties.

Latest update:

Project 120	Apr 2015	May 2015	Jun 2015	Jul 2015	Aug 2015	Sep 2015	Oct 2015	Nov 2015	Dec 2015	Jan 2016	Feb 2016	Mar 2016	YTD	15/16 Target
Applicants rehoused	1	2	2	1	4	0	4	9	2	2	1	2	30	60
Applicants currently under offer	5	4	4	2	11	4	9	13	6	4	6	5	73	

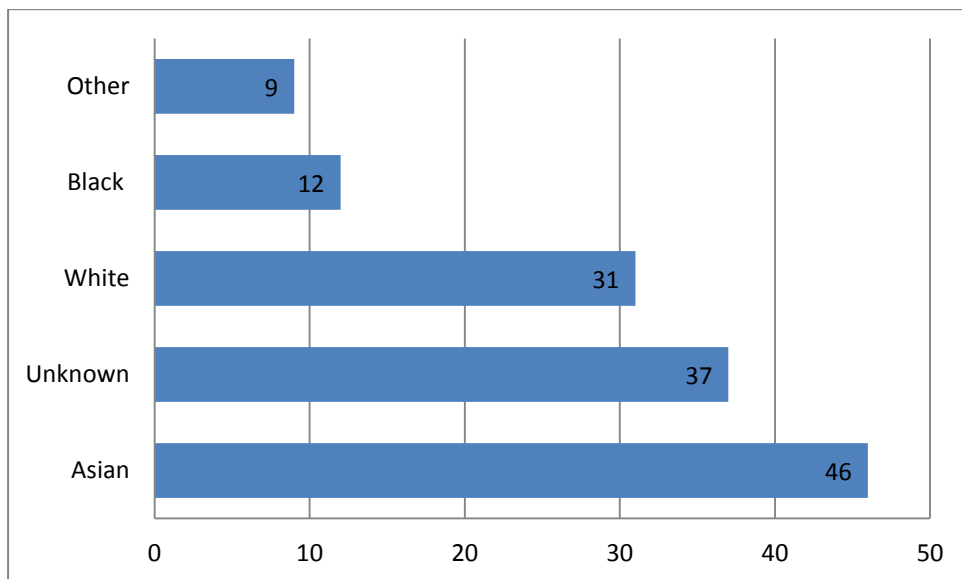
Source: CHR Forum Statistics, April 2016

Diagram 3: Number of clients assessed as requiring a wheelchair accessible housing (category A & B) by bedroom size.



Source: *Housing Options, Tower Hamlets Records*

Diagram 4: Category 1 & 2, Accessible Housing Need Register by Ethnicity



Source: *Housing Options, Tower Hamlets Records*

1.9 Lettings

Tower Hamlets operates a Common Housing Register with all major RPs operating the Borough. During 2009/10 the CHR adopted a new allocations policy which gives greatest priority to households with high medical and social need, households in severely over-crowded conditions and under-occupying households.

Table 10: Historical Lettings

Lets by bedroom size	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16
Bedsit	174	100	170	167	168	88	106	88	78	92
1 Bed	737	544	820	1019	816	854	840	652	722	718
2 Bed	733	673	733	883	799	1013	843	699	662	805
3 Bed	264	248	346	442	361	545	432	361	313	427
4 Bed	53	47	61	161	88	132	155	80	73	130
5 Bed	16	3	9	5	13	66	56	27	21	8
6 Bed	3	12	3	6	6	5	2	0	3	0
7 Bed	0	0	0	0	1	0	1	0	-	0
8 Bed	1	0	0	0	0	0	0	0	-	0
TOTAL	1,981	1,627	2,142	2,683	2,252	2,703	2,435	1,907	1,872	2,180

Source: *Housing Options, Tower Hamlets Records*

Table 11: Allocations by Priority Need 2015-2016

Banding		
1A_DECANT		
Decants	101	4.6%
1A_EMERGE		
Emergencies	42	1.9%
1A_MEDICAL		
Ground floor priority - medical	72	3.3%
1A_UNDROCC		
Under occupiers or downsizing	99	4.5%
1B_DECANT		
Decants	10	0.5%
1B_PRIOMED		
Priority medical	123	5.6%

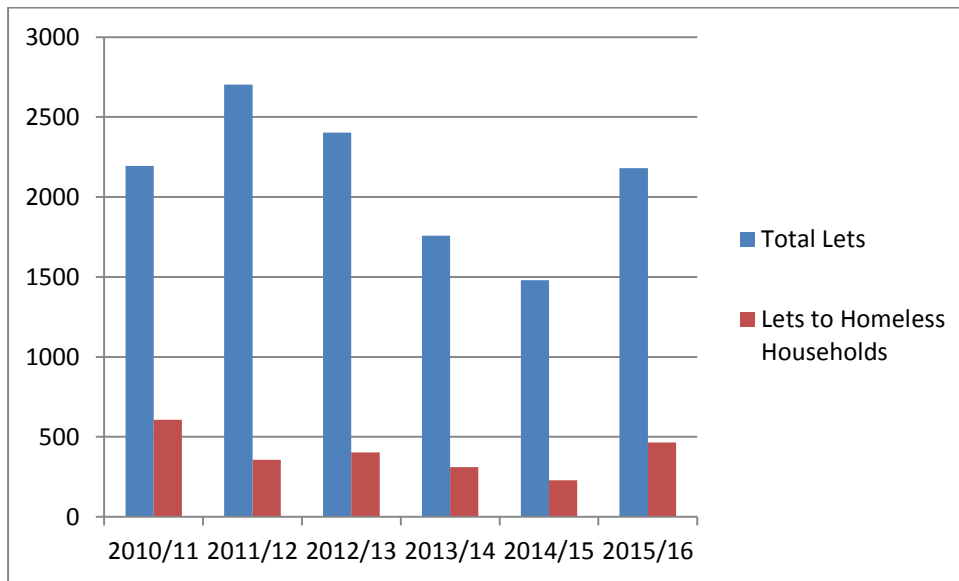
1B_PRIOSGL <i>Priority Single</i>	40	1.8%
1B_PRIOSOC <i>Priority social</i>	60	2.8%
1B_PRIOTRG <i>Priority target groups</i>	120	5.5%
2_OVERCRWD <i>Overcrowded applicants</i>	911	41.8%
2_PRIOHLSS <i>Priority homeless</i>	412	18.9%
3_CHRTRANS <i>Transfers</i>	31	1.5%
3_SHRADQHS <i>Applicants who are not overcrowded</i>	156	7.2%
CATFAIL	3	0.1%
Total Source: CHR Statistics, April 2016	2,180	

Social Housing Lets to Homeless Households

In 2008/9 the Borough's Common Housing Register partner landlords made 2,142 lets, 822 of which were to homeless households. In 2009/10 this increased to 2,608 lets, 943 of which were to homeless households. In March 2014 year the number of lets made to homeless households reduced to 210 reflecting the 2010/11 policy change which gave overcrowded households equal priority.

In 2015/16 the number of lets made reduced to 2,180 partly due to fewer new build units delivered in that year; of these 465 were lets to homeless households.

Diagram 5: Lets to Homeless Households 2010/11 to 2015/16



Source: Tower Hamlets Council lettings data

2. Housing supply

Housing Stock

- The housing stock in Tower Hamlets has increased by 27% since 2003; there are now almost 121,000 homes in the Borough.
- In 1981 over 86% of all homes in Tower Hamlets were Council/ GLC owned, today only 10.9% of the stock is Council owned and for the first time in the Borough's history, less than half the housing stock is social housing.
- The private rented sector is now the fastest growing housing sector in the Borough; it has risen from 18.3% of the stock in 2003 to around 39% of the stock in 2014.
- There are now approximately 7,000 student bedspaces in the Borough, the highest in London.
- There are close to 9,000 ex-right to buy leasehold properties managed by Tower Hamlets Homes in the Borough. Overall, there are more than 15,000 leasehold properties formerly owned by the Council.
- There are an estimated 2,800 intermediate housing units in the Borough.
- The Borough is growing by over 3,000 homes per year, making Tower Hamlets the quickest growing Borough in London. Consequently the borough qualifies for the highest level of New Homes Bonus in the country.
- Tower Hamlets has a strong track record of housing delivery and continues to provide among the highest number of affordable homes in the country
- The total delivery of new-build affordable homes from October 2010 to the end of March 2014 now totals 4,029 units. The target for the next four years (2014-2018) is to deliver 5,500 new affordable homes.
- Tower Hamlets has delivered 25% more homes than Birmingham, the second highest delivery authority in the Country and 30% more than Hackney, the second highest delivery authority in London.
- Almost 2,500 affordable homes have been delivered in Tower Hamlets in the last three years.

Private sector Stock

- According to the 2011 Private Sector Stock Condition Survey Tower Hamlets has 67,209 homes in the private sector, of which 62% are in the private rented sector. This figure will have risen since 2011.
- Private rented is now the largest tenure in the borough with 39% of the housing stock. The London average is 25%.
- Around 16% of properties are over-crowded while 39% are under occupying.
- Approximately half the leasehold stock sold under right to buy is now privately rented.
- Approximately 37% of the private stock was built post 1990.

- 19% of the borough's stock fail the decent homes standard compared with 35.8% nationally
- 6% have Housing, Health and Safety Rating System (HHSRS) category one hazards, compared with a national average of 23%
- 1.7% of the stock has a Standard Assessment Procedure (SAP) rating below 35.
- Approximately 350 HMOs are licensable under statute.
- 30% of all category one hazards (such as lack of space / pollutants) are in HMOs.
- Fire safety is the biggest hazard in HMOs; it represents 58% of all Hazards.

Future Housing Delivery

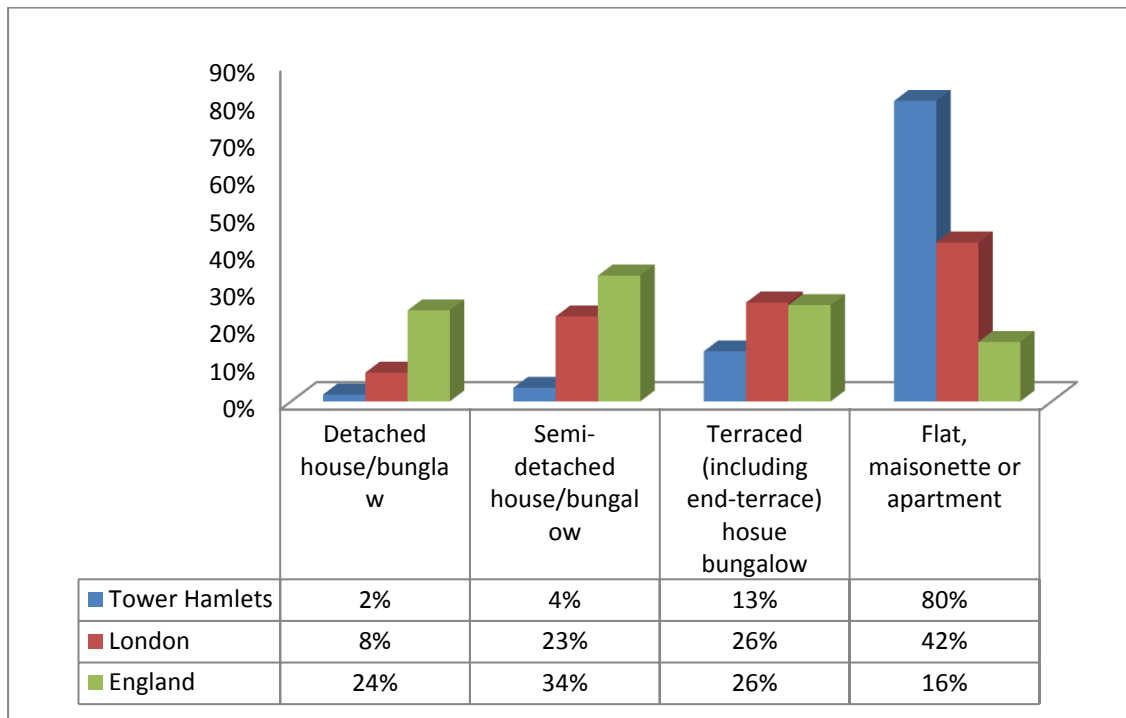
- Tower Hamlets has an annual housing target of 3,931 set up the Greater London authority and is expected to accommodate an additional 39,310 homes by 2021

2.1 Housing Stock

With an increase of 32.2%, Tower Hamlets had the largest increase in London in the number of dwellings between 2001 and 2011. Between 2008/09 and 2009/10 over 5,000 additional homes have been built of which 40% of these have been affordable. Since 2011/12 16,542 additional homes were delivered in Tower Hamlets.

The Borough's housing stock is dominated by flatted accommodation with 80% of dwellings comprising of flats compared to 42% in London and 16% in England. Between 2001 and 2011 Tower Hamlets a 10% increase in the number of houses but 36.7% increase in the number of flats, the largest in London.

Diagram 6: Accommodation Type in Tower Hamlets, 2011



Source: 2011 Census, Office for National Statistics.

Housing Delivery – National and London comparison

New Homes Bonus

New Homes bonus is paid annually to Local Authorities to recognise the number of new homes built and empty properties brought back into use by Local Authorities. An additional premium is paid for each affordable home built.

As well as an annual calculation based on a year's delivery, Local Authorities receive a commutative payment to reflect overall delivery over the six year period the New Homes Bonus has been paid for. The payments reflect how much more delivery LBTH has achieved in comparison to both London and Nationally.

Figure 3: Total Payments for 2011 - 2016

	Top 5 National		Top 5 London	
	LA	Payment	LA	Payment
1	Tower Hamlets	28,641768	Tower Hamlets	28,641768
2	Birmingham	21062083	Hackney	18042641
3	Cornwall UA	19570433	Southwark	16326874.

4	Hackney	18042641	Islington	15251000
5	Wiltshire UA	17880450	Lambeth	14020034

Table 12: Affordable Homes since 2010/11

2010/11	1 bed	2 bed	3 bed	4 bed	5 bed	6 bed
Social Rent	65	91	105	29	28	5
Intermediate Rent	65	73	30			
Shared Ownership	46	53	43	13		
2011/12	1 bed	2 bed	3 bed	4 bed	5 bed	6 bed
Social Rent	377	536	427	187	78	5
Intermediate Rent	20	30	1			
Shared Ownership	142	127	31	16	4	
2012/13	1 bed	2 bed	3 bed	4 bed	5 bed	6 bed
Social Rent	129	80	122	30	20	
Affordable Rent	1	1		1		
Intermediate Rent	6	6	3			
Shared Ownership	52	94	23			
2013/14	1 bed	2 bed	3 bed	4 bed	5 bed	6 bed
Social Rent	47	95	102	33	26	
Affordable Rent	35	26	22	4		
Shared Ownership	78	70	40	2	1	
2014/15	1 bed	2 bed	3 bed	4 bed	5 bed	6 bed
Social Rent	64	96	95	32	10	
Affordable Rent	75	46	29	14	2	
Shared Ownership	45	74	28			
Total	1,247	1,498	1,101	361	169	10
Total	4,386					

Source: LBTH, Report: Housing Policy and Affordability Commission, May 2016

Land holdings in either the General Fund or the Housing Revenue Account present the best opportunity to produce affordable housing in the Borough. This is because there is no land purchase involved and the Council can use its retained Right to Buy receipts and potentially, other resources such as appropriate capital receipts or uncommitted New Homes Bonus to subsidise the development in order to produce lower rents. This however will have implications for the financing of other council priorities.

The Council has a programme to deliver a minimum of 553 new homes at the sites in table 13.

Table 13: Affordable homes at framework rents

Scheme	Units	Comment
Poplar Baths/Dame Colet House	100	Completed
Bradwell Street	12	Completed
Watts Grove	148	Onsite
Jubilee Street	24	At Planning Stage
Baroness Road	20	
Locksley Estate (Site A & D)	54	
Hereford Street	38	
Tent Street	72	
Arnold Road	62	

Table 14: Number of homes in LBTH as net additions

Properties	Year1	Year2	Year3	Year4	Year5	Year6	Total Increase
	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	
CTB Completed	Sep-10	Sep-11	Sep-12	Sep-13	Sep-14	Sep-15	
Yearly Growth	2,977	2,873	3,368	2,070	3,241	2,013	16,542

Source: Tower Hamlets Council Data

Table 14 reveals 16,542 additional homes have been delivered in Tower Hamlets since 2011/12.

Tenure

Since 2001 there has been a dramatic change in the profile of households by tenure type in the Borough. In 1981 over 86% of all homes in Tower Hamlets were Council/GLC owned. In April 2014 around 10% of the stock was Council owned and, for the first time in the Borough's history, less than half the

housing stock is social housing. The private rented sector is now the fastest growing housing sector in the Borough, now accounting for around 39% of all housing. The Council and RSL housing stock available to rent are currently around 43,000 (around 36% of all stock), which is accessed by registration on the choice based letting system.

Tower Hamlets has the second lowest proportion of owner occupied households in the country with only 25% of households owning their own homes either outright or with a mortgage.⁶ In 2003 31% of households owned their own homes.

Although the proportion of social rented households has fallen since 2001 from 52.2% to 36% in 2014, Tower Hamlets still has the 4th largest proportion of social rented households in the country after Hackney and Southwark (both 43.7%) and Islington 42%.

In the last decade the private rented sector which has doubled increasing from 20% (17,513 households) in 2003 to 39% (45,978 households) in 2014. Tower Hamlets now has the fifth highest proportion of private rented households nationally after Westminster (39.7%), Kensington and Chelsea (35.8%) and Newham (34%).

Table 15: Comparison of Housing stock by tenure, April 2014

Tenure	2003	%	2011	%	2014	%
Owner occupied	27,308	31%	25,339	23%	27,179	23%
Council owned (<i>Rented</i>)	24,200	28%	12,500	12%	12,087	10%
Registered social landlord (<i>Rented</i>)	17,828	20%	26,484	24%	30,540	26%
Private rented sector	17,513	20%	41,870	39%	45,978	39%
Shared ownership	500	1%	2,000	2%	2,340	2%
Total	87,349		108,193		118,125	

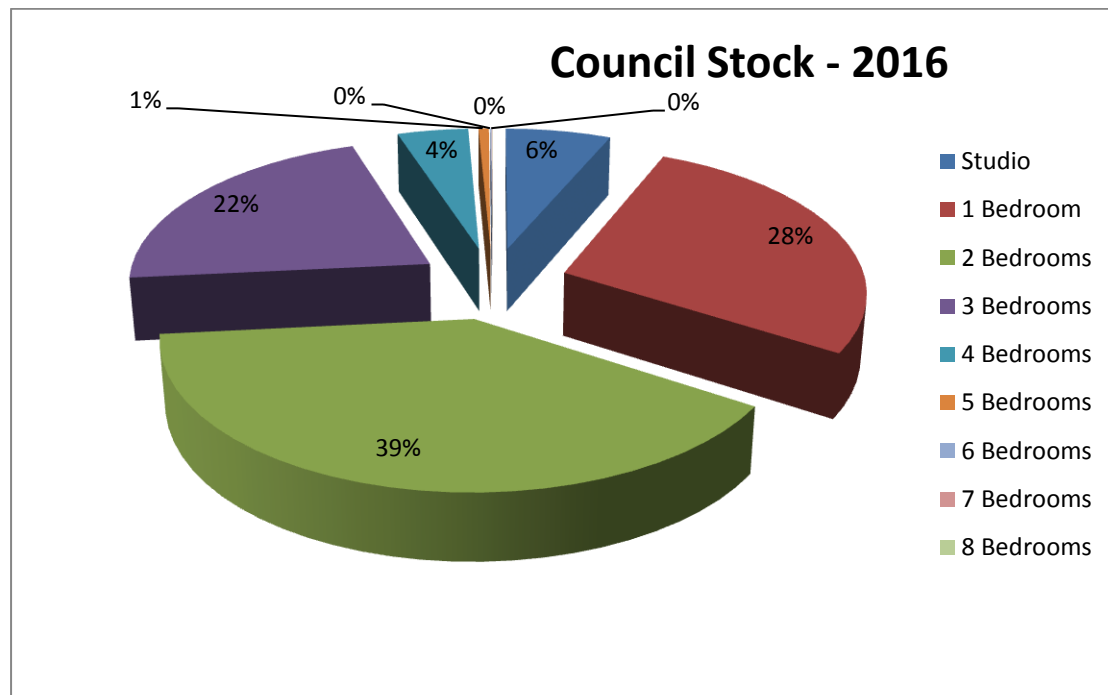
Source: LBTH Housing Affordability Commission, 2016

*These figures are updated estimates based on 2011 Census tenure split uplifted to reflect growth in residential numbers as recorded in the 2014 Council Tax records.

⁶ ONS 2014, A Century of Home Ownership and Renting in England and Wales

Council owned stock

Diagram 7: Tower Hamlets Dwelling Stock by Bedroom size



Source: Tower Hamlets Homes Stock Database, 2016

The number of dwellings now managed by the council's due to stock transfer and right to buy. The number of units managed by the council. The council stock is managed by its ALMO, Tower Hamlets Homes, has fallen to less than 12,100 units.

Registered Providers

There are currently 58 Registered Providers (RPs) operating in the borough managing almost 30,000 homes. Excluding Tower Hamlets Homes, the five largest RPs' in the borough are, Poplar HARCA, Old Ford, One Housing Group, East End Homes and Tower Hamlets Community Housing, between them, they manage 56.9% of all RP stock in the borough excluding Tower Hamlets Homes stock.

Table 16: Registered Providers in Tower Hamlets, 2016

Registered Provider Name	Stock Nos 2016 (SDR)	% of ALL stock
A2Dominion Homes Limited	139	0.48
Access Homes Housing Association Limited	27	0.09
Affinity Sutton Homes Limited	238	0.82
AmicusHorizon Limited		
Arhag Housing Association Limited	37	0.12
Arhag Housing Association Limited	121	0.41
ASRA Housing Association Limited	4	0.01
Belgrave Street Housing Co-operative Limited	23	0.07
Blue Square Residential Ltd	0	
Circle Thirty Three Housing Trust Limited	602	2.07
Co-operative Development Society Limited	19	0.06
East End Homes Limited	2259	7.8
East Homes Limited	1456	5.02
Family Mosaic Housing	186	0.64
Gallions Housing Association Limited	242	0.83
Gateway Housing Association	1738	6
Genesis Housing Association Limited	1212	4.18
George Green's Almshouses	8	0.02
Grand Union Housing Co-operative Limited	79	0.27
Habinteg Housing Association Limited		
Home Group Limited	9	0.03
Lien Viet Housing Association Limited	22	0.07
London & Quadrant Housing Trust	77	0.26
London Strategic Housing Limited		
Look Ahead Care and Support Ltd		
Metropolitan Housing Trust Limited	123	0.42
Mission Housing Association Limited	2	0.006
Moat Homes Limited	0	
Network Stadium Housing Association Limited	129	0.44
Newlon Housing Trust	695	2.4
North London Muslim Housing Association Limited	39	0.13
Notting Hill Home Ownership Limited		
Notting Hill Housing Trust	90	0.31
Old Ford Housing Association	2997	10.34
Omega Housing Limited	12	0.04
One Housing Group Limited	2845	9.82
Orbit Group Limited		
Orbit South Housing Association Limited		

Origin Housing Limited		
Peabody Trust	1146	3.96
Places for People Homes Limited	92	0.3
Poplar HARCA Limited	6107	21
Providence Row Housing Association	89	0.3
Salvation Army Housing Association	43	0.14
Sanctuary Housing Association	22	0.07
Seymour Housing Co-operative Limited	12	0.04
Shepherds Bush Housing Association Limited	0	
Southern Home Ownership Limited		
Southern Housing Group Limited	1197	4.1
Southwark and London Diocesan Housing Association Limited	58	0.2
Spitalfields Housing Association Limited	674	2.32
Swan Housing Association Limited	1635	5.64
The Guinness Partnership Limited	204	0.7
The Industrial Dwellings Society (1885) Ltd	146	0.54
The Mile End Housing Co-operative Limited	25	0.08
Tower Hamlets Community Housing Limited	2009	6.93
TPHA Limited	2	0.006
Veterans Aid		
Wilfrid East London Housing Co-operative Limited	67	0.23
TOTAL	28,958	100% (rounded up)

Source: Homes and Communities Agency, Statistical Data Return 2015 to 2016

The above table does not include the 12,000 homes managed by Tower Hamlets Homes on behalf of the Council.

Private Sector Housing

There has been a significant increase in the proportion of private sector housing in the Borough in the last two decades. Whilst in 1981 86% of the borough's housing stock was social housing by April 2014 approximately 39% of the Borough's housing stock is in the private sector.

The Private Sector Stock Condition Survey 2011

In 2011 the council commissioned consultants MDA to carry out a comprehensive survey of the condition of the borough's private sector stock and provide a profile of the of occupants including their socio-economic characteristics.

Demographics

- 22% of all private sector households are single person households
- 12% of all private sector households comprise of a resident aged 60 and over.
- 16% of all private sector households are overcrowded
- Around 29% of vulnerable households living in private sector live in non-decent housing.

Stock Condition

- 37% of the private sector stock was built before 1990
- Reflecting the age of the stock 19% of the private sector stock fails the decent homes standard compared to 35.8% nationally.
- Around 6% of the stock has Category 1 hazards compared to 23% nationally.
- The average cost of making a home decent during 2011-12 and 2012-13 is £9,368
- 1.7% of the stock has a Standard Assessment Procedure (SAPO) rating below 35.
- There are approximately 350 licensable HMOs in the borough
- Fire safety is the biggest hazards in HMOs, representing 58% of all hazards

Private rented sector

- There are approximately 4,000 households living in private rented accommodation.
- 67% of all fuel poverty in the private sector is in private rented accommodation.
- 35% of households living in private rented accommodation have a disabled resident.
- 19% of residents living in private rented accommodation are overcrowded.
- Nearly 27% of residents in private rented accommodation are under-occupying.

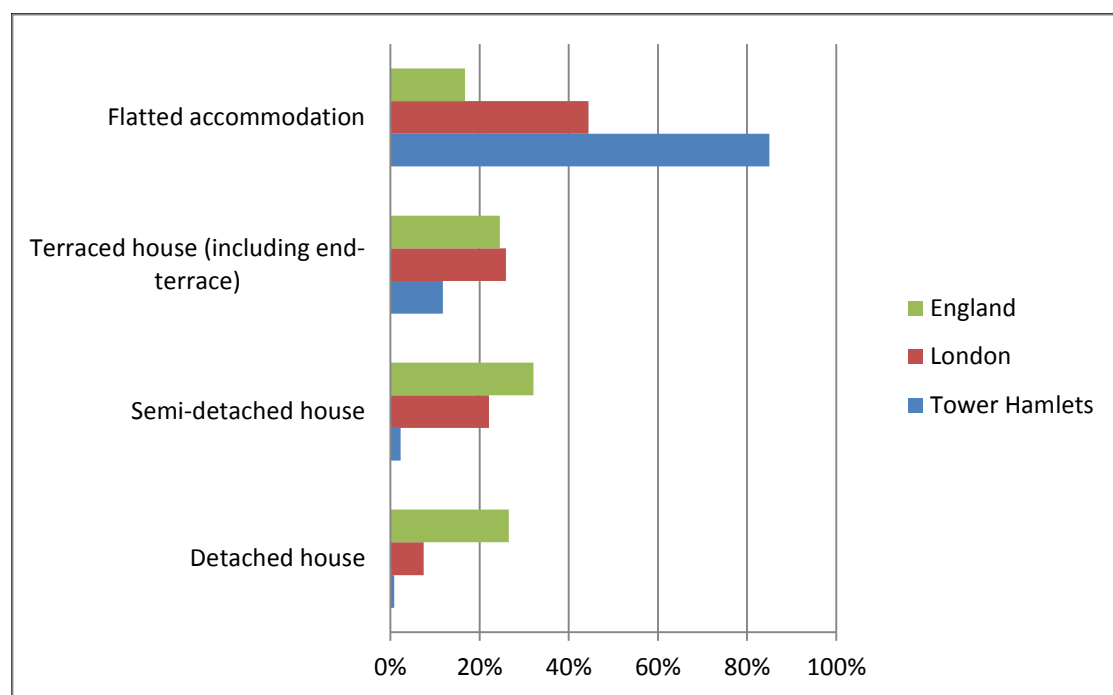
Reflecting the extent of residential development in the borough the survey also confirmed that around 37% of private sector housing has been built since 1990. This compares to 12.6% across the rest of the country.

Table 17: Private sector stock by Age

Dwelling Age	No.	%
<1919	14,465	22
1919-1944	5,860	9
1945-1964	7,680	11
1965-1980	6,706	10
1981-1990	7,900	12
1990+	24,598	37
Total	67,209	100

Source: Private Sector Stock Condition Survey, 2011

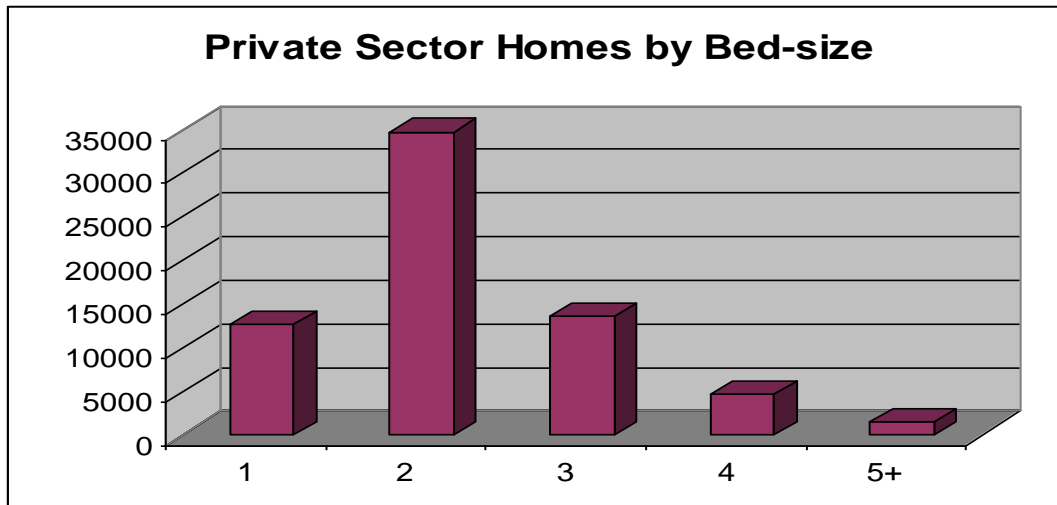
Diagram 8: Private Sector Homes by Property Type.



Source: 2011 Census

The Borough's private sector stock is predominately flatted with 85% of all private sector homes are flats compared to an average across England of 70%, and 70% of all private sector homes are smaller bedsits or studios and one or two bedroom homes.

Diagram 9: Private Sector homes by bedroom size



Source: Private Sector Stock Condition Survey, 2011

Table 18: Private sector Dwellings by Tenure

Dwelling Tenure	No.	%
Owned mortgage	18,655	27.8
Owned Outright	6,684	9.9
Private rented	41,870	62
Total	67,209	100

Source: Private Sector Stock Condition Survey, 2011

However, although the number of homes built in the Borough has increased rapidly since 1990, there is evidence that the level of home ownership is in decline. Only 38% of those in the private sector own their own home and 62% are now privately rented.

There are potentially four different private rented markets in Tower Hamlets:

- *Market one – High end new build* - made up of predominately new build homes bought by investors and professional landlords, these properties are professionally rented in single or shared occupancy.
- *Market two – HMOs* – HMOs in the borough which can be categorised as follows:
 - Ex RTB family HMO – e.g. one family per room. With a lack of affordable homes, welfare reform and increasing private sector rents, it is likely that many households will adopt this tenure to remain in Tower Hamlets;
 - Ex RTB young person’s HMO – with changes in the benefit rules for 25’s to 34 year old, it is probable that more of these lets will; develop; and
 - Student lets.

The Stock condition Survey identifies that these homes have the highest level of hazard failure and disrepair.

- *Market three* – Standard assured and assured short hold tenancies. These properties are mainly self-contained family homes. Many of these households have been housed with the assistance of the council, either placed as homeless households or supported into accommodation through a rent deposit or rent guarantee scheme. Changing benefit rules mean that many of these tenancies may be at risk. In addition these homes are becoming increasingly occupied by young professionals sharing the accommodation in order to meet the increasing rental costs in the borough.
- *Market four* – 1977 Rent Act tenancies. While the number of these tenancies has dwindled as residents have died or moved to supported accommodation, there are still a few remaining in the borough.

2.2 Future Housing Supply

As set out in the London Plan, the Mayor recognises the pressing need for more homes in London to meet the growing population. The 2013 London SHMA estimated a need for 48,840 new homes to be built between 2015 and 2035, of which 48% should be market homes, 32% social rent or affordable, and 20% intermediate.

To ensure London boroughs' contribute to the supply of housing, the London Plan sets out the annual housing targets for each Borough until 2025 as a minimum level for delivery, as set out in the Core Strategy. Tower Hamlets ten year (2015-2025) housing delivery target is 39,314 which equates to 3,931 per year and 9% of the London target, this means Tower Hamlets has the highest housing target of any London Borough.

These targets have been informed by the London Plan evidence base – 2014 Strategic Housing Market Assessment (SHMA) and the Strategic Housing Land Availability Assessment (SHLAA).

Residential Development Projections

Expected Growth

The Borough is expecting significant residential development growth over the next ten years.

Clearly, the levels of delivery will be dependent upon macroeconomic circumstances although this is arguably a slightly conservative estimate.

Tower Hamlets has the highest housing target of any London Borough. **On average, 3,931 homes are required to be delivered every year – this is 9% of all homes in London.** Assuming all other London Boroughs meet their housing target, which is an ambitious assumption, Tower Hamlets is projected to deliver at least 11.2% of all housing units in London up to 2025/26. It is likely that in reality this proportion will be much higher.

The expected levels of development will result in significant increases to the population of the borough. It is expected that the population will grow by 93,000 to 2025/26, reaching a level of 381,000.

Challenges

There are significant challenges to managing the unprecedented levels of expected growth. One significant challenge will be to deliver the infrastructure required to support development. The Council will need to deliver 3 – 4 new secondary schools, 6 or 7 new primary schools, at least 8 new primary healthcare facilities as well as new libraries, open spaces, transportation and connectivity infrastructure, new community facilities and sustainability and waste management infrastructure. The Council will not have enough funding to support the new infrastructure required to ensure the expected growth is sustainable.

The Council is keen to hear how Central Government may be able to help with the delivery of the new infrastructure and whether it would be appropriate for the Borough to be considered as a special case for funding assistance by the newly formed National Infrastructure Commission.

Student accommodation

There has been intense pressure for London to accommodate more student bedspaces for the increasing number of students in the capital. According to data published by Higher Education Statistics Agency (HESA) there are now 359,990 students in London. This trend has also been mirrored in Tower Hamlets with the numbers of students increasing 71% from 17,666 in 2001 to 30,162 in 2011.

Private developers have responded to this demand. There are now 74,000 student bedspaces in London.⁷ After Camden and Islington, Tower Hamlets has the 3rd largest proportion of student bedspaces in the capital, accommodating 12% the stock (approximately 7,000 bedspaces). Much of the accommodation being delivered is by private operators and not by the two Universities, Queen Mary and London Metropolitan, located in the Borough. LBTH completions data revealed 693 student bed spaces were completed in 2013/14, a significantly large increase on 2012/13. Analysis published by Drivers Jonas Deloitte's in December 2012, in the London Student Housing 2012 Crane Survey suggests that a fifth of all student accommodation under construction in London is in Tower Hamlets.

2.3 Housing Costs

Rent

- Lower quartile rents in the borough are £365 per week for a two bedroom and £462 for a three bedroom flat. The weekly Local Housing Allowance rate for a family needing two bedrooms is £302.33, and for three bedrooms it is £354.46.
- The median rent for a room in a Tower Hamlets shared flat or House in Multiple Occupation is £147 per week. Single people under 35 have a weekly Local Housing Allowance of £102.99.
- Median rents have increased by around a quarter in the last five years, to £1430 pcm (£330 pw) for one bedroom and £1750 pcm (£403.85 pw) for two bedroom flats.
- As of 2013, very nearly half of all households in Tower Hamlets have an annual income less than £30,000.
- From autumn 2016 a workless family with children will receive benefits of no more than £384.62 per week to cover rent and living expenses.
- In spite of market conditions, the Council's Housing Options and Assessment service were able to incentivise private landlords to let to 30 low-income households facing homelessness in 2015-16.

⁷ University of London, Student Accommodation Survey 2015

Housing Benefit

There are 9,621 council properties in the borough where housing benefit is paid., There are 20,992 non-council properties paid for by housing benefit. Housing benefit is claimed for 4,299 of properties in the private rented sector.

Incomes

44% of households in Tower Hamlets are in income poverty. Table 19 outlines the mean, median and modal household incomes for those living in the Borough.

Table 19:

Type	Income Level
<i>Borough Median household income - equivalised data</i>	£29,896
<i>Borough Modal household income- equivalised data</i>	£17,500
<i>Borough Mean household income - equivalised data</i>	£38,999
<i>Borough Median household income - un equivalised data</i>	£30,379
<i>Borough Modal household income- un equivalised data</i>	£12,500
<i>Borough Mean household income - un equivalised data</i>	£38,644

Source: 2016 CACI Pay check data

Note: The data for household income from CACI is for all households not just for those in work, they do not make the distinction between those in work and those not.

The difference between the two sets of data in table 19 is that the equivalised data has been adjusted for household size.

The equivalisation process takes a couple living with no children as a reference point and adjusts the incomes of larger households downwards relative to this benchmark (i.e. assumes that a higher income would be needed for a larger household to have the same standard of living). The incomes of smaller households are adjusted upwards relative to the reference household type, recognising that the same income would allow smaller households a better standard of living.

Strategic Housing Market Assessment 2014

The London Borough of Tower Hamlets Strategic Housing Market Assessment 2014 (SHMA) has been undertaken at a time of considerable change, both locally and nationally. The SHMA highlights the complexity of understanding housing need in a relatively dynamic housing market. Key drivers such as the local economy, complex population change and the need to support growth in the local economy – all these factors interact to make the establishment of objectively assessed housing need a significant challenge.

The SHMA has considered various factors regarding the housing needed in Tower Hamlets; critically, it has updated the current evidence base on population and households and considered the impact of wider Market Signals. From this, the SHMA has derived an objectively assessed housing need to inform housing and planning policies.

Summary Findings 2014 SHMA

Attached are two extracts from the report:

- Executive summary which provides more background and the final total of the objectively assessed need which totals **2,569** dwellings per annum/57,400 over 24 years.
- Extract from the sections on the tenure mix required which is set out as follows:

Housing Type	Number of Dwellings
Market Housing	18,900
Intermediate affordable housing	2,500
Social rented housing*	36,600
Total housing requirements	57,400
	%
Market Housing	32.8%
Intermediate affordable housing	4.4%
Social rented housing*	62.8%

Source: Tower Hamlets Council Data

*Social rented need includes housing provided to rent from LAs and Registered Social Landlords, Affordable Rent with housing benefit support and housing benefit supported private rented accommodation at 2011 levels;

	Market	Intermediate	Social rented	Total
1 bedroom	1,800	1,400	11,500	14,600
2 bedroom	5,200	300	9,900	15,300
3 bedroom	8,400	400	11,400	20,100
4 bedroom	3,600	500	3,400	7,400
Total	18,900	2,500	36,600	57,400

Housing Needs Survey

The Survey Overview

Opinion Research Services (ORS) was commissioned by The London Borough of Tower Hamlets to undertake a Housing Needs Survey (HNS) with households in Tower Hamlets.

The HNS was conducted via face to face interviewing and captures households' current housing and future housing needs and aspirations. The purpose of the survey is to assist Tower Hamlets Council in planning housing and other community services in the borough.

The results in this report are based on a survey of around 600 face to face interviews conducted from a sample of Tower Hamlets residents. Interviews were achieved between 7th July and 21st September 2014 with the main or joint homeowner or tenant. Quotas were set on age, gender and working status in order to achieve a cross-section of responses.

The survey contained questions on the following topics:

- » Current Housing Arrangements;
- » Housing History
- » Future Housing Aspirations
- » Economic and Financial Status
- » Owner occupiers
- » Renters
- » Profiling Information

Key Headlines

Current Housing

- The majority of housing in Tower Hamlets is flats, apartments or maisonettes (86.9%), of which 79.9% are purpose built. Houses (12.8%) and bungalows (0.3%) make up only a modest proportion of the overall stock.
- In terms of the number of rooms or bedrooms available for use, owner occupiers are more likely to have three bedrooms or more. Social renters are more likely to have two bedrooms than other tenures, while there are more private renters with one bedroom than other tenures.
- The most significant problems associated with the home are related to heating and damp. Many respondents had an issue with damp (c.43%) or mould (c.41%). There are also issues with cold (42%) and over 20% had difficulty paying their fuel bills.
- Almost 80% of respondents are satisfied with their homes, while c.12% are dissatisfied. The levels of satisfaction are lowest among social renters (20% either very or fairly dissatisfied) and highest among owners (90% either very or fairly satisfied).

The Area

The most common problem respondents see locally is rubbish (30+% see it as either a fairly or very big problem) followed closely by young people hanging around (c.30%). Other issues include drug use/dealing, people being drunk/rowdy and noisy neighbours/parties. The least problematic issue was abandoned cars (c.6%)

Housing History

- Overall, nearly 60% of the respondents had lived in Tower Hamlets more than 5 years. This number was highest among social renters (80%+) and lowest among private renters (c.25%). Private renters are also significantly more likely to have lived in the area for less than a year (27%). Overall, this indicates a relatively more mobile population of those who rent privately and a more stable social renting population.
- In terms of the length of time in the current home, social renters are again more settled with over 65% having lived in their present home for more than 5 years. Private renters again are more mobile, with over 65% having lived in their present home less than 3 years and 35% less than 1 year.
- In terms of the respondents' previous address, the highest was abroad (46.2%) while 27.9% had previously lived in Tower Hamlets. Only 8.4% came from outside London but within the UK.
- When previous tenure and current tenure were compared, the survey showed those who rented privately were more likely to rent privately again. Most owners either privately rented or lived rent free in their previous home. Similarly, those who social rent their current home were more likely to have had a social rented home previously.

Future Housing Aspirations

- There were many different reasons among those respondents who expect to move in the next two years. However, the most common reasons were the size of the current home and the need for a better environment.
- Most respondents who expect to move in the next two years expect to stay in Tower Hamlets (46%) or London (a further 25%). 20% expect to move elsewhere in the UK while 10% expect to move abroad. When tenure is considered, more owners and private renters expect to move abroad than social renters. More social renters expect to stay in Tower Hamlets (60%), while only 17% of owners do.
- The main reasons for moving away from Tower Hamlets are related to both affordability (21.6%) and the need for family support (21.7%). However, the range of reasons is varied and 35% of respondents gave 'other' reasons.
- Interestingly, most respondents expect to keep their current tenure when they move; e.g. 85% owners, 86% social renters. However, 30% of private renters expect to become owners when they move.

- Many respondents would prefer to have more bedrooms when they move. This is especially so where they have one bedroom now – most would like two bedrooms when they move. However, the following figure shows how people are prepared to be pragmatic when setting their preference against what they would accept.
- There is relatively close alignment between tenures in terms of aspirations or need to move home in the next two years.
- In terms of where households expect to move, Council tenants are more likely to want to stay within their neighbourhood or Tower Hamlets (76%) compared with Housing association (62%) or All households (46%). Interestingly, more HA or All Households aspire to move abroad.

Economic and Financial Status

- Most survey respondents were working either full or part time (54%). If other forms of employment are considered, this figure rises to 59.3%.
- 49% of respondents work in Tower Hamlets and a further 38% in London, while 10% had no one specific location. The proportion of homeworkers is 10%. When tenure is considered, slightly more owners work at home, while more private renters work elsewhere in London. Social renters are slightly more likely to work in Tower Hamlets.
- Commuting times show that almost 95% of those working have a journey of under one hour to get to work. Social renters have the longest journey with 10% having to travel over an hour to get to work and a further 21% between 45 minutes and an hour. Owners have the shortest journey with 66% taking less than 30 minutes to get to work.
- Incomes vary considerably among respondents and partners; over 29% have less than £15,000 pa, while over 50% have less than £30,000 pa. However, Tower Hamlets also has some significant incomes; over 15% of respondents have incomes over £60,000 pa). 25% of households included other income earners not including the respondent to the survey or their partner.
- 18% of households said their rent or mortgage was either extremely difficult to manage or putting a strain on their budget. In tenure terms, those social renting were more likely to be under strain while owners were more likely to find mortgage payments manageable.

Owner Occupiers

- Three quarters of owners had bought their property with a mortgage; however, there is evidence of support for purchase beyond borrowings and savings – 19.4% of buyers had help from family/friends, while 1.2% received an inheritance.
- Market values of homes reveal how property prices have risen in Tower Hamlets; many homes are now valued at £1m+ (6.9%) while 32% were over £0.5m. Very few properties are valued below £200,000 (5.7%).

Renters – Social and Private

- Survey responses highlight how social rent is lower than private rent; while almost 60% of social renters pay less than £500 pcm, only 18% of private renters do so. 25% of private renters pay over £1,500 pcm while a further 18% pay over £1,000.
- Only 2.9% of private rented respondents receive Housing benefit (HB) in full, with 11.3% receiving HB in part. However, 40% of social renters get full HB, with a further 31% getting part HB.
- The impact of Welfare Reform has been felt more by social renters (26%) than other tenures (private rent 10%; owners 6%).
- There are some Ethnic groups who are more likely to be in the Private Rented Sector, particularly the White other group, but also Black, and, to a lesser extent, Asian Indian and Chinese.

Current Housing Conditions

- When compared by tenure, the White and Asian ethnic groups have the highest proportions of owner occupation (c.30% for both groups). The Black population of Tower Hamlets were least likely to be owner occupiers (c.6%). Those most likely to be living in social housing are Mixed (47%), Black (42%) and Asian (35%).

Current Housing Circumstances

- The survey indicates that there are significant differences between older and non-older households in their housing tenure.
- Over 50% of 'All older' households own their home either outright or on a mortgage. Over 40% are renting in the social sector while only c.2% rent in the Private Rented Sector. Households with no older members are more likely to be renting in the private rented sector although roughly the same number own as the All Older group.
- It can be seen that 'All older' households have the lowest levels of incomes of the groups with almost 70% having incomes of less than £10,000 while 'None older' have the highest levels of income.
- This has implications for the quality of the housing stock: repair bills can be unaffordable to those on lower incomes, and the quality of the home may decline over time.

Health Problems

- The household survey also indicated that over 50% of both all older households and 36% of Some older households have at least one member suffering from a self-reported health problem (Figure 149). This compares with c.25% of households which have no older members.

- Other health problems that were cited included hearing impairment, mental health, blindness, being older, dementia and learning difficulties.
- Care and Support Needs shows that of the household members with a health problem, 54% were able to care for themselves while the remaining 46% needed some form of care or support. 10.3% needed permanent 24 hour care or support.
- Most of the households (55%) which contained someone who had a health problem were renting an affordable home – 39.4% from the Council, 15.9% from a housing association. However, nearly a third are renting privately (31.8%). Only 13% own their own home and are therefore responsible for their own adaptations.

Household Survey Data for People with Support Needs

- The survey respondents were asked about health issues for their households. The questions were designed to discover if the household contained anyone who was suffering from long-term health problems and to assess the impact of any health problems on the housing and care needs of that household.
- In the 2011 Census¹⁴ around 35% of all households in Tower Hamlets said that their day to day activities were limited by a long term health problem or disability. It should be noted that some of the households contained more than one individual with health issues.
- The main problems identified by the survey were conditions which substantially limit one or more basic physical functions such as walking, climbing stairs or lifting.
- When Disability and Illness are considered, Council tenants are noticeably more likely to have Health problems (49%) or perceive themselves as having Poor or Very Poor health (31%). Housing association tenants have slightly better perceptions (35% and 22% respectively).

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2016-21 Tower Hamlets Housing Strategy Building new homes and communities

Full Equality Assessment (EA)

Section 1: General Information

1a) Area of Activity – Housing

LBTH Housing Strategy 2016 - 2021

1b) Service area

Strategy, Sustainability and Regeneration
Development and Renewal Directorate

1c) Service Head

Mark Baigent – Service Head, Strategy, Sustainability and Regeneration (Interim)

1d) Name and role of the officer/s completing the EA

Martin Ling – Housing Strategy Manager
Aaron Cahill – Housing Strategy Project Manager
Marc Lancaster - Private Sector Housing Policy Officer
Tom Scholes-Fogg – Housing Policy Officer

Section 2: Information about Housing Strategy and the EA

2a) In brief please explain what the assessment involves

The 2016-21 Housing Strategy sets out the strategic housing priorities for the borough over the next 4+ years. Housing is a top priority for the Mayor of Tower Hamlets. The Strategy document is designed to set out the direction of travel for the council's future approach to deliver the vision that is identified.

The lack of decent, quality, affordable housing is the major challenge the council and its residents and stakeholders currently face. Despite the borough being the top deliverer of affordable housing in the country, we need to continue to build more homes, but at a price that people can afford. We need to ensure that the homes available to us are allocated fairly and that we explore all options necessary to meet housing need. This strategy focuses also on the standard of private rented housing and how we can improve it as it is now the largest segment of the housing market. This broader vision to our approach is set out in the Tower Hamlets Partnership Community Plan 2015. The Community Plan themes focus on making the borough:

- A great place to live
- A fair and prosperous community
- A safe and cohesive community
- A healthy and supportive community.

To deliver the housing aspects of our vision in the Community Plan this housing strategy seeks to ensure that:

- there are housing choices for all sections of our diverse community
- the homes people live in are in a decent condition, warm, and weathertight
- the most vulnerable people's housing needs are met in a fair and inclusive way
- all homes are in safe, prosperous and thriving areas
- our response to housing issues is measured and achieves value for money

To deliver this vision, we have broken down our approach into four broad themes, identifying the challenges and setting out how we're going to meet them.

The themes are:

- Delivering affordable housing, economic growth, and regeneration
- Meeting people's housing needs
- Raising private rented housing standards
- Effective partnership working with residents and stakeholders.

Under each of the headings there are a number of policy actions, totalling 33 in all which are detailed in the strategy and identified to help deliver the vision.

Delivery Theme 1 – More affordable housing, economic growth and regeneration

The context for this delivery theme is as follows: housing need continues to be at a very high level. As of April 2016, there were 19,124 households on the Common Housing Register seeking suitable accommodation for their needs, including homeless people; people living in overcrowded accommodation; and people with severe health and/or disability issues. In tandem with this, the borough is continuing to experience high housing growth with Tower Hamlets expected to contribute a minimum of 39,310 new homes, approximately 10 per cent of the London housing target, by 2025.

Given that there are presently 121,000 homes in the borough, this is housing growth of nearly a third of the stock presently located in the borough. Employment projections published by the GLA estimate the number of jobs in the borough will almost double, increasing by 169,000, between 2010 and 2031 to 379,000. Despite this The borough is likely to become more polarised between an increasingly wealthy home owning or renting group and a reducing group of residents in affordable housing or subsidised housing). With that is a continuing need to regenerate large areas of the borough, sometimes including estate redevelopment, which ideally should increase the amount of affordable housing; widen housing choice; and deliver wider regeneration outcomes. The challenge of this delivery theme is to calibrate economic growth and regeneration outcomes from housing-led investment to generate positive outcomes for the protected groups identified in this Equalities Impact Assessment (EA) that will help lessen the prospect of further polarisation amongst the Tower Hamlets community.

Delivery Theme 2 - Meeting people's housing needs

Maintaining a high supply of new affordable housing and tackling homelessness are a core theme of this strategy, it's as important that the homes available are allocated on a fair, inclusive and transparent way. Due to the continuing high demand for affordable and other forms of suitable accommodation, the council has to think innovatively about how to meet this demand. This also means considering housing options outside the borough and also using private rented accommodation to meet its homelessness duties.

Particular attention is given to people with both physical and mental health needs and what kind of accommodation is suitable for such applicants to live independently, or with some onsite or floating support (meaning support provided through regular visits), based on what their assessed housing and health needs are. There are also other specific areas of housing needs such as those of older and younger people and gypsies and travellers which the council needs to adopt approaches to which are covered in this section.

Delivery Theme 3 - Raising private rented housing standards

The context for this delivery theme is as follows:

One of the most significant housing changes in the past decade has been the growth of the private rented sector and the decline of both owner occupation and social renting. In Tower Hamlets, between 2001 and 2011 owner occupation declined in terms of relative tenure share by 2.4 percentage points and social rent by 12.9 percentage points. Private renting increased by 15.3 percentage points, by April 2014 accounting for around 39% of the housing stock compared to 31% across the whole of Inner London and 18% across the UK. Owner occupation is particularly low in Tower Hamlets, at just 27% - including only 7% who own outright - compared to 64% in the UK, half of whom own outright.

More than a third (37%) of the borough's privately-rented housing was built after 1990. In general, this new-build housing is relatively expensive, well-managed and let in single or shared occupancy. A proportion is let on a short-term basis including to financial-sector employees in Canary Wharf.

However, many private sector homes in the borough are in poor condition and poorly managed. A fifth of privately rented homes do not meet decent homes standards, and around 29% of vulnerable households in the private sector live in non-decent housing.

A significant number of former council homes bought under the right to buy are now let to private tenants. Tower Hamlet Homes estimate that around 50% of properties sold under Right to Buy are now privately rented. In some instances this has led to serious overcrowding and anti-social behaviour such as noise nuisance, fly-tipping, and drug-related criminal behaviour on estates owned by the council and its housing associations partners.

Most private landlords have small portfolios: around 89% of landlords are private individuals, accounting for 71% of all PRS dwellings, with 78% of all landlords owning a single dwelling for rent – 40% of the total stock. Only 5% of landlords were companies, accounting for 15% of PRS stock.

A minority of private landlords and agents deliberately profit from leaving their tenants to live in rundown, unsafe, or overcrowded properties, or intimidate and threaten tenants.

Median rents have increased by around a quarter in the last five years making the private rented sector unaffordable for many Tower Hamlets residents. This is particularly acute in workless households dependent on increasingly inadequate levels of housing benefit. In spite of this, the sector provides a significant amount of accommodation used by the council to meet housing need.

Delivery Theme 4 - Effective partnership working with residents and stakeholders

The context for this delivery theme is to facilitate greater partnership working between the council's residents and the broader stakeholder environment. Ultimately, the success of the housing strategy and the actions identified are largely dependent on successful partnership working with residents, housing associations, the Greater London Authority and private sector partners. This section seeks to unpack who the key relationships need to be with and what outcomes should be sought. In the context of this EA, a key challenge is to ensure that protected groups are engaged with and meaningful efforts are made to access difficult to reach groups.

Community Profile

The following statistics illustrate the diversity of the population of Tower Hamlets and these statistics have helped inform the conclusions reached in this assessment. An in depth evidence base has also been produced to support the development of the Housing Strategy.

- The population of Tower Hamlets was estimated to be 295,200 as at June 2015.
- This represents an increase of around eleven thousand people over the year - a percentage increase of 3.9 per cent – the second largest percentage rise in England & Wales, after the City of London (+8.5 per cent).
- Over the decade to 2015, the Tower Hamlets population has increased by 38.3 per cent – the largest increase in of all local authority areas in England and Wales.
- Of the borough's population increase over the last year (+11,200): around a third was due to natural change, which is the difference between births and deaths. The remaining 69 per cent was due to a positive net migration flow, driven by international migration.
- Tower Hamlets has relatively high levels of population mobility or 'turnover'. Population turnover rates capture the size of the population flows in and out of the borough each year, relative the size of its population. In 2014/15 the turnover rate was 224 per 1000 population – the 11th highest rate in England and Wales, and 9th highest in London.
- Tower Hamlets has a relatively young age structure, characterised by a high proportion of young adults. Almost half of all borough residents (48 per cent) are aged 20-39, significantly higher than the percentage nationally (26 per cent in England) or regionally (35 per cent), and the highest percentage of all local authority areas in England and Wales.
- Conversely, Tower Hamlets has proportionately fewer older residents compared with other areas: 9 per cent of Tower Hamlets residents are aged 60 or over, compared with 23 per cent in England & Wales and 16 per cent in London. Tower Hamlets has the lowest proportion of over 60s in England & Wales.

- The proportion of children aged under 16 in the borough population is 20 per cent - similar to that of London and nationally (20 and 19 per cent respectively).
- More than two thirds (69 per cent) of the borough's population belong to minority ethnic groups (ie not White British): 55 percent belong to BME (Black and Minority Ethnic) groups and a further 14 per cent are from White minority groups.
- The Census provides data about 18 different ethnic group populations. The borough's three largest groups are the Bangladeshi, White British and 'Other White' populations. Considered together, people from these three ethnic groups make up around three-quarters of the Tower Hamlets population.
- The Bangladeshi population makes up almost one third (32 per cent) of the borough's population – considerably larger than the proportion across London (3 percent) or England (under 1 per cent). Tower Hamlets has the largest Bangladeshi population in England.
- White British residents comprise 31 percent of the borough's population, far lower than the percentage nationally (80 per cent). Tower Hamlets has the fifth lowest proportion of White British residents in England. Newham and Brent had the lowest rates (17 and 18 per cent respectively).
- The third largest ethnic group in the borough is the 'Other White' group who comprise one in eight borough residents – close to the London average. This group is very diverse and includes residents from a mix of ethnic backgrounds (eg Europeans, Australians, Americans).
- Residents from Black ethnic groups make up 7 per cent of the population comprising: 4 per cent from Black African groups; 2 percent from Black Caribbean groups; and 1 percent from Other Black groups. Tower Hamlets has a smaller proportion of Black residents compared to the London average (7 vs. 13 per cent).

- **Disability and caring**

- The Census 2011 results showed that 13.5% of residents stated that they had a long-term health problem or disability that limited their day to day activities (34,300 residents) This is slightly lower than the regional and national rates (14.1% in London and 17.6% England)
- The 2011 Census found that 19,356 residents provided some level of unpaid care in the borough, which accounted for 7.6% of all LBTH residents. Compared with London and England averages, the provision of unpaid care in the borough is significantly skewed towards the provision of more (20+) hours. While 56.5% of those providing unpaid care do so for 19 hours per week or less, the remaining 43.5% provided 20 hours per week or more. 18.1% of carers provide 20 to 49 hours of care per week, and over a quarter provide unpaid care for 50 hours or more per week (4,915 residents).

2b) What are the equality implications of your proposal?

The intention is that the equality implications of the proposals set out in this document are overwhelmingly positive. It should be noted the 2016-21 Housing Strategy is in essence a 'direction of travel' document.

On adoption of the Housing Strategy the actions will provide the rationale for individual decisions. The majority of the actions will require further specific actions/permissions from the Mayor of Tower Hamlets supported by Cabinet members as they will require commitment of expenditure or direction on how existing expenditure is directed. This is particularly relevant in the context of the medium term financial strategy for the council, resources available to deliver the actions identified in this document can be expected to reduce, both from revenue and capital sources.

In addition with the continuing roll out of welfare reform, it can be expected that there will be negative impacts on the protected groups which the council is not necessarily in a position to fully mitigate.

Recommendation

2c) What is the cumulative equality impact of your proposal?

The cumulative equality impacts of the 2016-21 Housing Strategy are considered to be positive. As identified in the four themes above, the council is seeking to meet a broad range of housing needs, particularly from people from disadvantaged backgrounds who historically are over-represented amongst the protected groups identified by the council. The council will need to be mindful in certain instances to ensure that positive impacts for certain protected groups do not unintentionally negatively impact on other protected groups. The council will also be seeking to mitigate the negative impacts of welfare reform of protected groups as the imposition of the Local Housing Allowance on supported housing and the £23,000 Universal Credit cap on households where there is no adult in employment means that such households are unlikely to be able to afford to live in the borough, particularly if they live in private rented accommodation.

Further assessments of individual policies which emerge from the Housing Strategy will be carried out and if any potential negative impacts are identified mitigating actions will be identified accordingly.

In Section 3 of this document the broad equality impacts on each of the protected groups each of the first three delivery themes are addressed in turn. For the final delivery theme – effective partnership working with residents and stakeholders – the council's approach will be to continue to work with residents and stakeholder groups who either represent or are from the protected groups to ensure their needs and aspirations are not negatively impacted by any of the council's housing proposals.

Section 3: Equality Impact Assessment

Appendix 6
Draft 2016-21 Housing Strategy
Equality Assessment

1. Disability

Identify the effect of the housing strategy on different disability groups

Please describe the analysis and interpretation of evidence to support your conclusion.

Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration

Maintaining a sustained supply of affordable housing that meets disabled people's needs will deliver positive outcomes for disabled people. Current policy is that 10% of affordable housing should be accessible (or capable of adaptation) for people who use wheelchairs. The council is committed to delivering between 35% and 50% of new housing as affordable housing as set out in its current planning policy and therefore meeting this target will help deliver positive outcomes for this protected group.

The Strategy confirms the Council's commitment to Project 120, which was started in 2012 to address the specific housing needs of families with a wheelchair user and other complex medical needs on the Council's Housing waiting list. The name stems from the 120 families who were on the Accessible Housing waiting list at that time.

The Council works closely with developers and housing associations to identify specific needs of a family at an early stage and identify a property in development which can then be adapted accordingly to meet that need. The project has been very successful and by April 2016, 148 families had been rehoused accordingly.

The Strategy has a commitment to work towards meeting the housing needs of people with mental illness including learning disabilities and autism and where appropriate opportunities for new build development tailored to meet this need will be considered within an overall accommodation plan for this group

Delivery Theme 2 - Meeting people's housing needs

The proposed changes will have a positive impact on disabled people in Tower Hamlets. The Council will continue to work with landlords and developers to assist with ensuring the needs of disabled residents are met through new build programmes and Disabled Facilities Grant for home modifications which private residents, registered providers and landlords may apply for.

The Census 2011 results showed that 13.5% of residents stated that they had a long-term health problem or disability that limited their day to day activities (34,300 residents) Data has also been collected about the extent to which the home had been built or adapted to meet the needs disabled persons and what facilities need to be provide. 10.5% of households said that their home had been adapted to meet the needs of a disabled household member.

The vulnerable adults commissioning team are developing an Accommodation Plan which will provide an overview of the accommodation available to people with learning disabilities (LD). The borough seeks to improve the overall offer of accommodation including opportunities to invest to save whilst also supporting young people to remain close to their families, friendship networks and local community. We expect the number of people with disabilities and long term conditions, for example, dementia, autism, to grow and people are likely to live for longer with these health conditions. The Children and Disabilities Joint Strategic Needs Assessment (JSNA) for the borough states that the number of children with special educational needs (SEN) and disabilities is higher than both London and England averages. It is therefore likely that the demand for accessible housing will increase and the design of new local housing needs to reflect that. Taken with the longer term broad objective of relocating people with learning disabilities currently located outside the borough back into Tower Hamlets, this will increase demand for suitable accommodation, often on the ground floor.

Delivery Theme 3 - Raising private rented housing standards

Private renters in the borough tend to be in better health than residents in other tenures. In 2011, 6% of Tower Hamlets residents identified themselves as being in bad or very bad health. Only 1.9% of private renters class themselves as being in poor health. 4.1% of owner occupiers including those living in shared ownership class themselves as being in poor health. Residents with bad or very bad health disproportionately live in social rented housing – in 2011, 10.1% of social renters identified themselves as having bad or very bad health. On the other hand, 35% of households living in private rented accommodation have a disabled resident.

The Housing Strategy aims to refresh the private sector housing renewal policy, improving partnership working and coordination with the Better Care Fund. The refresh aims to provide more customer focused services, to reduce hospital admissions and to enable people to return from hospital more quickly. The refresh also aims to broaden access to the Disabled Facilities Grant, improving the quality of life for people living with limiting disabilities by providing aids and adaptations at home.

The Private Sector Housing Strategy refocuses resources and powers, including around licensing, on the environmental health team. This focus aims to improve conditions in the privately rented housing in the borough, in particular dealing with conditions that cause ill health. Improving physical standards and the quality of management in the PRS will deliver social and health benefits. The links between poor health through damp and mould and overcrowding are well established. The strategy will have a positive impact on disabled households.

The adoption of the 2016-21 Housing Strategy is expected to have a positive impact on this protected group.

<p>2. Gender reassign - ment</p> <p><i>Identify the effect of the restructure on different gender groups (inc Trans) groups</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Will the change in your policy/service have on people who have had their gender reassigned or are undergoing gender reassignment?</p> <p>There is no evidence to suggest or reason to believe that people with reassigned gender will be disproportionately affected by the Housing Strategy. Rather, the aim of improving housing conditions in the borough will be of benefit to this group to the same extent as others.</p> <p>Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration</p> <p>Theme 1, Delivering affordable housing, economic growth, and regeneration is not expected to have either a negative or positive impact on people who have transitioned or are transgender.</p> <p>Delivery Theme 2 - Meeting people’s housing needs</p> <p>Theme 2 - Meeting people’s housing needs is not expected to have either a negative or positive impact on people who have transitioned or are transgender</p> <p>Delivery Theme 3 - Raising private rented housing standards</p> <p>Theme 3 - Raising private rented housing standards is not expected to have either a negative or positive impact on people who have transitioned or are transgender</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a neutral impact on this protected group.</p>
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<p>3. Pregnancy and maternity</p> <p><i>Identify the effect of the housing strategy on women who are pregnant or in maternity</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Will the change in your policy/service have an adverse impact on women who are pregnant or in maternity?</p> <p>There is no evidence to suggest or reason to believe that women who are pregnant or in maternity will be disproportionately affected by the Housing Strategy. Rather, the aim of improving housing conditions in the borough will be of benefit to this group to the same extent as others.</p> <p>Delivery Theme 1, Delivering affordable housing, economic growth, and regeneration</p> <p>Theme 1, Delivering affordable housing, economic growth, and regeneration is not expected to have either a negative or positive impact on women who are pregnant or in maternity</p> <p>Delivery Theme 2 - Meeting people’s housing needs</p> <p>Theme 2 - Meeting people’s housing needs is not expected to have either a negative or positive impact on women who are pregnant or in maternity</p> <p>Delivery Theme 3 - Raising private rented housing standards</p> <p>Theme 3 - Raising private rented housing standards is not expected to have either a negative or positive impact on women who are pregnant or in maternity</p> <p>The Council have consulted widely in developing the strategy including with members of the Tower Hamlets Parent and Carer Council.</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a neutral impact on this protected group.</p>
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<p>4. Race</p> <p><i>Identify the effect of the housing strategy on different race groups including ethnic or national origins, colour and nationality</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Will the change in your policy/service have an adverse impact on race groups including ethnic or national origins, colour and nationality?</p> <p>The council has actively involved ethnic minority communities in consulting on the 2016-2021 housing strategy. Such consultation has involved holding events at idea stores, consulting people in markets across the borough and attending Friday prayers.</p> <p>Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration</p> <p>Ethnic minority households in the borough are disproportionately in more housing need in the borough with nearly 70% of applicants on the common housing register being from black and minority ethnic communities. Bangladeshi families represent nearly 55% of those on the list compared to a borough population of 33%. A high proportion of these households are overcrowded and require larger family homes.</p> <p>The Housing Strategy reflects the current local plan target of 45% of new affordable homes being family size in order to meet this need from this community.</p> <p>Delivery Theme 2 - Meeting people's housing needs</p> <p>Ethnic minority households in the borough are disproportionately affected by homelessness, as is the case regionally. In 2015/16 80% of households accepted as homeless were from BME groups. However, ethnic minority groups account for nearly 70% of the borough's population.</p>
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**4. Race
(cont/...)**

Identify the effect of the housing strategy on different race groups including ethnic or national origins, colour and nationality

Please describe the analysis and interpretation of evidence to support your conclusion.

Bangladeshi households are, by far, more likely to be homeless than any other ethnic group in the Borough. Though only accounting for 30% of the population, 59% of households accepted as homeless in 2015/16 are Asian. Black households in the borough are also disproportionately affected by homelessness when compared to the population as a whole. Black households make up 16% of households accepted as homeless, but represent 7% of the Borough's population.

The Tower Hamlets Strategic Housing Market and Needs Assessment (SHMA) found that BME households are, on average, larger and more likely to be overcrowded. The Housing allocations scheme gives a high priority for overcrowded families and the changes to the policy set out in the new strategy do not change this priority banding.

In addition the Council has an agreed overcrowding reduction plan which sets out a number of actions and initiatives to reduce overcrowding including encouraging under-occupiers to properties more suitable to their needs.

On the needs of Gypsies and travellers, council officers will liaise in order to ensure gypsy and traveller needs are fully considered in the housing strategy and set out in the local plan to be adopted in late 2017.

Delivery Theme 3 - Raising private rented housing standards

The Council's Private Housing Strategy aims to benefit all private tenants. Inevitably, this will disproportionately benefit those groups over-represented in the private sector - white people from non-British backgrounds and people of Chinese heritage. However, there is no evidence or reason to believe that this will disadvantage other groups. Specific actions proposed by the strategy will benefit minority groups.

White people from non-British backgrounds are significantly over-represented in the PRS: these groups represent 30.2% of private renters in the borough but just 14.5% of the total population. Nearly two thirds of white people from non-British backgrounds in Tower Hamlets - 64.8% - live in the private rented sector.

People of Chinese heritage are also significantly over-represented, forming less than 2% of the population but 5% of private renters. Nearly half of people with Chinese ethnicity in Tower Hamlets – 49.6% - live in the private rented sector.

Other ethnic groups are under-represented. White British people make up 35.5% of private renters in the borough but 40.8% of the population. Overall, BAME communities represent 34.25% of private renters in the borough but 42.4% of the total population. 34.3% of Tower Hamlet's BAME population and 20.4% the borough's white British

<p>4. Race (cont/...)</p> <p><i>Identify the effect of the housing strategy on different race groups including ethnic or national origins, colour and nationality</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Owner occupiers are disproportionately white: 68.5% of owner-occupies are white. Most of these are British: just 12.4% of home owners are from non-British white backgrounds. whilst those groups make up 14.5% of the population.</p> <p>Conversely, whilst the BME communities make up over 70% of the population, they represent just 31.6% of owner-occupiers. 11.6% owner-occupiers are of Bangladeshi heritage. Around 70% of households with a Black household reference person are social renters.</p> <p>Some actions aim to benefit specific excluded groups. The Council's engagement with agents and landlords will include a focus on mitigating the impact of the Immigration Act 2015's "right to rent" requirements in order to try to prevent discrimination against BAME and new migrant groups. A number of actions - notably licensing - aim to engage directly with landlords to improve standards. This is likely to be of particular benefits to tenants who do not have English as a first language and are therefore less likely to report their landlords for breach of standards: a quarter of households in Whitechapel and Spitalfields and Banglatown, where the licensing scheme is focused, do not have English as a first language. The Council have consulted widely in developing the strategy including with Praxis service users.</p> <p>Overall, the adoption of the 2016-21 Housing Strategy is expected to have a positive impact on this protected group.</p>
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5. Religion or belief

Identify the effect of the housing strategy on people who have religious views or beliefs using the prompts above

Please describe the analysis and interpretation of evidence to support your conclusion.

Will the change in your policy/service have on people who have religious views or beliefs?

Tower Hamlets has the highest percentage of Muslim residents in England and Wales – 38 per cent compared with a national average of 5 per cent. Conversely, the borough has the lowest proportion of Christian residents nationally: 30 per cent compared with a national average of 59 per cent. The council is aware of the high percentage of Muslim residents particularly of Bangladeshi heritage in the borough and is aware they suffer from particular aspects of housing need such as acute over-crowding. Section 4 on race sets out the issues covered within the housing strategy which relate to this group

Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration

Theme 1 - Delivering affordable housing, economic growth, and regeneration **will** generally have a neutral effect on people who have religious views or beliefs. It should be noted that there can be positive impacts in certain instances if new places of faith are built as part of wider regeneration projects.

Delivery Theme 2 - Meeting people’s housing needs

Theme 2 - Meeting people’s housing needs will generally have a neutral effect on people who have religious views or beliefs

Delivery Theme 3 - Raising private rented housing standards

With the exception of Muslims and people of no religion, the representation of different faith and belief groups in the private rented sector reflects Tower Hamlets’ broader demographic very closely. 34.9% of the borough’s population but just 17.1% of private renters identify themselves as Muslim; and 19.0% of the population but 30.3% of private renters say they have no religion.

There are no reasons to believe that any aspect of the housing strategy negatively affects any religious or belief group. There are reasons to believe that the strategy of engagement with agents and mitigation of the impact of the Immigration Act 2015’s “right to rent” requirements will have a positive impact on Muslim residents.

5. Religion or belief (cont/...)

Identify the effect of the housing strategy on people who have religious views or beliefs using the prompts above

Please describe the analysis and interpretation of evidence to support your conclusion.

Immigration Act 2015's "right to rent" requirements will have a positive impact on Muslim residents.

The adoption of the 2016-21 Housing Strategy is expected to have a **neutral** impact on this protected group.

<p>6. Sex</p> <p><i>Identify the effect of the housing strategy on women using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Will the change in your policy/service have an adverse impact on women?</p> <p>Most areas of the housing strategy will have a neutral impact on women as most areas of the strategy are gender neutral. However a high proportion of single parents in housing need will be women and women are more likely to be affected by domestic violence.</p> <p>Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration</p> <p>Theme 1 - Delivering affordable housing, economic growth, and regeneration will generally have a neutral effect on women</p> <p>Delivery Theme 2 - Meeting people’s housing needs</p> <p>Theme 2 - Meeting people’s housing needs will generally have a neutral effect on women</p> <p>Delivery Theme 3 - Raising private rented housing standards</p> <p>Theme 3 - Raising private rented housing standards will generally have a neutral effect on women</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a neutral impact on this protected group.</p>
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7. Sexual Orientation

Identify the effect of the housing strategy in relation to people who are lesbian, gay or bisexual using the prompts above

Please describe the analysis and interpretation of evidence to support your conclusion.

Will the change in your policy/service have an adverse impact on lesbian, gay or bisexual people?

It is widely recognised that issues related to sexuality and sexual identity can play a key role in the onset of homelessness (Crisis, 2005). Research by the Albert Kennedy Trust in 2015 shows that LGBT young people are more likely to find themselves homeless than their non LGBT peers, comprising up to 24% of the youth homeless population. Further, 69% of LGBT homeless youth have experienced familial rejection, abuse and violence; and homeless LGBT youth were also much more likely than their heterosexual counterparts to participate in substance abuse and fall prey to sexual exploitation on the streets. Only 2.6% of the housing services surveyed by Albert Kennedy Trust acknowledged the unique needs of homeless LGBT young people and had services to meet these needs.

Hard data on older LGBT people is less easily available: indeed it is of concern that 30% of agencies still fail to monitor sexual orientation or gender identity. Homeless Link estimated in 2010 that 7 per cent of clients using homelessness services were LGBT.

2010 data collected by Stonewall shows that from 760 callers to their helpline 73 were sleeping rough, 44 were in hostels, refuges or night shelters and 104 sofa surfing. For under 25s the number of people who were street homeless, or sofa surfing increased.

Work by the charity Polari highlights the difficulties faced by older GLBT individuals, particularly as they find themselves forced to adapt to new housing arrangements including living in sheltered accommodation and long term residential or nursing facilities

Whilst there is no reason to believe that residents of any sexuality will be disadvantaged by the proposals set out in the housing strategy, the Council and its partners will need to be mindful of the needs of this group particularly in relation to the provision of services to single homeless people

7. Sexual Orientation

Identify the effect of the housing strategy in relation to people who are lesbian, gay or bisexual using the prompts above

Please describe the analysis and interpretation of evidence to support your conclusion.

Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration

Theme 1 - Delivering affordable housing, economic growth, and regeneration will have a neutral impact on lesbian, gay or bisexual people

Delivery Theme 2 - Meeting people's housing needs

Theme 2 - Meeting people's housing needs will have a neutral impact on lesbian, gay or bisexual people

Delivery Theme 3 - Raising private rented housing standards

Theme 3 - Raising private rented housing standards will have a neutral impact on lesbian, gay or bisexual people

<p>8. Marriage and Civil Partnerships</p> <p><i>Identify the effect of the housing strategy in relation to people who are married or in civil partnership using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Will the change in your policy/service have an adverse impact on people who are married or in civil partnerships?</p> <p>The 2011 census states that 22.4% of the borough’s households contain married or civil partners, 9.5% cohabiting couples. In the private rented sector, couples are disproportionately unmarried: 15.3% are married or civil partners whereas 13.5% are not. Owner occupiers are disproportionately married or civil partners: 26.2% rather than 11.6%.</p> <p>People who are married or in civil partnerships are treated in the same way as single people in term of housing need and there is no evidence to suggest that any aspect of the housing strategy will have an adverse impact on this group</p> <p>Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration</p> <p>Theme 1 - Delivering affordable housing, economic growth, and regeneration will have a neutral impact on people who are married or in civil partnerships?</p> <p>Delivery Theme 2 - Meeting people’s housing needs</p> <p>Theme 2 - Meeting people’s housing needs will have a neutral impact on people who are married or in civil partnerships?</p> <p>Delivery Theme 3 - Raising private rented housing standards</p> <p>Theme 3 - Raising private rented housing standards people needs will have a neutral impact on people who are married or in civil partnerships?</p> <p>There is no reason to believe that either married couples, civil partners or cohabiting couples will be disadvantaged by the private sector housing strategy.</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a neutral impact on this protected group.</p>
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<p>9. Age</p> <p><i>Identify the effect of the housing strategy in relation to people who are from certain age groups using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Will the change in your policy/service have an adverse impact on people from certain age groups?</p> <p>Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration</p> <p>The Council aims to deliver a range of affordable housing to meet the needs of the whole community including families with young children, older persons and younger adults who have yet to form long term households but wish to live in the borough. The Local Plan sets out affordable housing requirements across a range of bedroom sizes in order to provide a balanced approach to meeting a range of needs form people at different stages in their life.</p> <p>Delivery Theme 2 - Meeting people’s housing needs</p> <p>The council recognises that people are living longer and often do not have housing choices that enable them to more to more appropriate sized accommodation that meets their needs. The Cabinet adopted an older persons’ housing needs statement in April 2013, and has been proactive in ensuring the needs of older residents are met.</p> <p>The 2011 Census revealed that Tower Hamlets was the home to 24,300 people over the age of 60. The council recognises that the housing needs of older people are different in that one 65-year-old may be fit and healthy, and be able to live an independent life, whilst another 65-year-old may be unwell and restricted, thus have to live in sheltered accommodation.</p> <p>It is estimated that the number of people over 65 in the Borough will increase by approximately 26% between 2016 and 2026. In 2016 8.2% of the borough’s population consisted of those over 60, this will increase to 8.4% in 2021, 9.1% in 2026, 10.2% in 2031, and 11.3% in 2036. The 2011 Census revealed that 65% of older people in the Borough have a long-term illness. The Council is developing an Ageing Well strategy that will be designed to include a holistic approach to meeting the changing housing needs of elderly people.</p> <p>Conversely younger people are more likely to be impacted by homelessness and the Strategy sets out a range of response to meet the needs of this group through housing advice, hostel provision and advocacy.</p>
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9. Age

Identify the effect of the housing strategy in relation to people who are from certain age groups using the prompts above

Please describe the analysis and interpretation of evidence to support your conclusion.

of measure to help meet the needs of this group.

Will the change in your policy/service have an adverse impact on people from certain age groups?

Conversely younger people are more likely to be impacted by homelessness and the Strategy sets out a range of response to meet the needs of this group through housing advice, hostel provision and advocacy.

Delivery Theme 3 - Raising private rented housing standards

Tower Hamlets is a relatively young borough – 39% of the population were aged between 20 and 34 in 2011. The younger the resident, the more likely they are to live in the private rented sector. In 2014, three in five young adult households were private renters, the largest share of any age group. Since the Council’s Private Housing Strategy aims to benefit all private tenants, younger people will disproportionately benefit. However, there is no reason to believe that older age groups will be disadvantaged. Indeed, changes proposed in the strategy to partnership working around Disabled Facilities Grant and the Better Care Fund are likely to directly and disproportionately benefit older people.

Two thirds of Tower Hamlets adults aged 24 and under (65.6%) live in the private rented sector. That proportion falls for each successive age group, until just 6.8% of the over 65s rent privately. 68.3% of private renters in Tower Hamlets are aged under 35; just 2.2% of private renters are aged 65 and over.

Age group	% of group live in PRS	% of PRS are in this group
24 and under	65.6	15.1
25-34	54	53.2
35-49	25.9	24.4
50-64	10.6	5.1
65 and over	6.8	2.2

<p>Age (cont/...)</p> <p><i>Identify the effect of the housing strategy in relation to people who are from certain age groups using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Rates of home ownership are lowest in the youngest and oldest age groups: 10.1% of residents aged under 25, and 27.4% aged 65 and over, are owner-occupiers. Just 3% of owner occupiers in the borough are aged under 25.</p> <p>The strategy entails refreshing the Council's private sector housing renewal policy to set out the approach, including to partnership working and the Better Care Fund, over the 2016-21 years. The strategy aims to provide more customer focused services, to reduce hospital admissions and to enable people to return from hospital more quickly. In 2015-2016, 133 residents aged over 65 received Disabled Facilities Grant, 57.1% of the total number of grants given. Whilst it should be noted that this is a lower proportion than nationally - 71% of grants go to people over the age of 60 – this will clearly have a disproportionately positive impact on older people.</p> <p>Older people going into care often have to sell their homes to pay fees. The Private Sector Housing Strategy proposes developing packages to enable these people to let their homes through the Council rather than selling them.</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a neutral impact on this protected group.</p>
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<p>10. Socio economic</p> <p><i>Identify the effect of the housing strategy in relation to people who are from low income, low wealth groups using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Will the change in your policy/service have an adverse impact on people who are on low incomes and have low wealth?</p> <p>Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration</p> <p>The obvious contribution that affordable housing can make to improving socio-economic inclusion is ensuring that affordable housing costs are sufficiently low enough to allow occupiers of affordable housing for rent and ownership to have sufficient disposable income to make work pay and/or ensure people have income left over to meet other subsistence costs. Key to that is aligning economic growth and regeneration outcomes deliver employment opportunities for local people living in disadvantaged areas of the borough.</p> <p>Delivery Theme 2 - Meeting people’s housing needs</p> <p>The demographics of Tower Hamlets are very mixed. This is a diverse borough and one in which there is a high level of poverty. According to council data 44% of households are in income poverty and struggle to pay for basic bills such as gas, electricity and water.</p> <p>The changes to the allocations scheme require the council to set aside 1% of lets to rehouse social housing tenants who want to move for employment reasons. These changes came into effect in April 2015. The Lettings Plan will be amended to add social workers as key workers in order to improve recruitment and retention in the borough.</p> <p>For those working people in the borough who don’t qualify for social housing or are struggling to afford to rent in the private rented sector, it is proposed in the housing strategy that an intermediate housing register is developed. This would mean rents are above social rents but no less than 20% less than market rents. LBTH data shows there are an estimated 2,800 intermediate housing units in the Borough.</p> <p>LB Tower Hamlets must comply with this law; however as of September 2016 the Government has not yet published regulations stating how this law will be implemented. The legislation will result in households earning more than £40,000 in London to pay more rent if they want to remain living in social housing. This rent increase is estimated to be an extra 15 pence for every £1 earned in salary.</p>
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<p>10. Socio economic (cont/...)</p> <p><i>Identify the effect of the housing strategy in relation to people who are from low income, low wealth groups using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Delivery Theme 3 - Raising private rented housing standards</p> <p>Housing is a key factor shaping poverty in London, with high poverty rates associated with high housing costs, and a notable shift towards poverty in the private rented sector. Housing costs make a significant difference in all wards across Tower Hamlets, with child poverty <i>after</i> housing costs around 13 to 16 percentage points higher than before housing costs.</p> <p>Poverty is concentrated among renters in London, with just under a half of social renting households and two in five private renting households in poverty in 2013/14, compared to around one in six owner occupiers.</p> <p>Tower Hamlets is highly deprived on the barriers to housing and services domain. In terms of the average LSOA score measure, Tower Hamlets is ranked 4th most deprived out of 326 areas in England on this domain, after Newham, Waltham Forest and Brent. Almost two thirds (62 per cent) of the borough's LSOAs fall within the ten per cent most deprived in England on this domain – the second highest proportion nationally, after Newham (where 84 per cent of LSOAs are highly deprived).</p> <p>The private rented sector consists of different markets catering to different socio-economic groups. Residents on medium and low incomes are entirely excluded from accommodation with higher levels of rent.</p> <p>However, median rents have increased by around a quarter in the last five years making the private rented sector unaffordable for many Tower Hamlets residents. This is particularly acute in workless households dependent on increasingly inadequate levels of housing benefit.</p> <p>Only about 10% of housing benefit claimants live in the private rented sector. Of these, in 2015 more than half were in work. Private tenants are less likely in general to be in poverty in Inner than Outer London, both because it is too expensive for most people in poverty to continue to rent privately, and because the larger social housing stock means more of the poor are housed in social housing.</p>
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<p>10. Socio economic (cont/...)</p> <p><i>Identify the effect of the housing strategy in relation to people who are from low income, low wealth groups using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>The housing strategy aims to make private rented housing more accessible to lower income groups by maximising the number of landlords willing to let to homeless households and low-income households nominated by the Council. Its impact here is positive for poorer residents.</p> <p>Whilst the English Housing Survey suggests that, nationally, satisfaction with accommodation is broadly similar for private renters of different income groups, the lowest quality accommodation objectively is let to tenants who have the lowest income.</p> <p>The strategy aims to develop the borough’s licensing schemes, and to give greater focus and resource to enforcement activity, in order to improve housing conditions in the sector. Around 29% of vulnerable households living in private sector live in non-decent housing. Much of the strategy aims at improving conditions in the cheapest housing – including houses in multiple occupation - and therefore it is these financially and socially excluded households that will benefit most.</p> <p>It is arguable that in such a buoyant private rented market working with landlords to improve conditions will drive up rents even further, disadvantaging and ultimately driving out poorer residents. There is no evidence to confirm this. The strategy aims to bring housing up to a minimum acceptable standard in order to realise the Council’s commitment to ensuring that the homes people live in are in a decent condition, warm, and weathertight.</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a positive impact on this protected group.</p>
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Section 4: Equality Impact Assessment Action Plan

Please list in the table below any adverse impact identified and, where appropriate, steps that could be taken to mitigate this impact.

If you consider it likely that your proposal will have an adverse impact on a particular group (s) and you cannot identify steps which would mitigate or reduce this impact, you will need to demonstrate that you have considered **at least one alternative** way of delivering the change which has less of an adverse impact.

Adverse impact	Please describe the actions that will be taken to mitigate this impact
None	

If an adverse impact cannot be mitigated please describe an alternative option, its costs and the equality impact.

Alternative option	

Section 5: Future Review and Monitoring

Please explain how and when the actual equality impacts of the Housing Strategy will be reviewed and monitored.


The implementation of the 33 policy actions set out in the Housing Strategy will be monitored and reviewed quarterly / three times a year. As part of that process, the equality impacts of the policy actions will be monitored, particularly when more detailed proposals are put forward (and individual EAs developed) and implemented.

APPENDIX A: Equality Impact Assessment Test of Relevance

TRIGGER QUESTIONS	YES / NO	IF YES PLEASE BRIEFLY EXPLAIN.....
Does the Strategy reduce resources available to address inequality?	No	
CHANGES TO A SERVICE		
Does the Strategy alter access to the service?	No	The Strategy covers a range of services, many of which will be reshaped over the lifetime of the strategy in order to achieve the efficiencies that the Council has to achieve by 2020. Changes to specific service areas and the impact on access will be considered in more detail through individual restructure or policy plan changes.
Does the Strategy involve revenue raising?	No	The Strategy does not propose any specific revenue raising proposals

Does the Strategy alter who is eligible for the service?	No	The Strategy does not propose any changes to eligibility for services
Does the change involve a reduction or removal of income transfers to service users?	No	
Does the change involve a contracting out of a service currently provided in house?	NO	
CHANGES TO STAFFING		
Does the change involve a reduction in staff?	No	<p>The Strategy covers a range of services, many of which will be reshaped over the lifetime of the strategy in order to achieve the efficiencies that the Council has to achieve by 2020.</p> <p>Changes to specific service areas and the impact on access will be considered in more detail through individual restructure or policy plan changes</p>
Does the change involve a redesign of the roles of staff?	NO	<p>The Strategy covers a range of services, many of which will be reshaped over the lifetime of the strategy in order to achieve the efficiencies that the Council has to achieve by 2020.</p> <p>Changes to specific service areas and the impact on access will be considered in more detail through individual restructure or policy plan changes</p>

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Decision Report Cover Sheet: Council 5 December 2016	 TOWER HAMLETS
Cover Report of: Matthew Mannion, Committee Services Manager	Classification: Unrestricted
Mid - Year Review and Activities of Treasury Management Strategy and Investment Strategy for 2016/17	

Originating Officer(s)	Matthew Mannion, Committee Services Manager (Cover Report)
Wards affected	All Wards

Summary

The Mid - Year Review and Activities of Treasury Management Strategy and Investment Strategy for 2016/17 report was presented to the Audit Committee on 8 November 2016. The Committee reviewed the report and agreed that it should be recommended to Council for consideration.


The Report and Appendices are attached to this Cover Sheet.

Recommendations:

The Council is recommended to note:

1. The treasury management activities and performance against targets for the six months to 30 September 2016.
2. The Council's investment balance of £406.85m as at 30 September 2016 of which £131.62m was invested with money market funds (MMF) and £105m invested with UK Banks and Building Societies as set out in Appendix 1 to the report.
3. The Council's position on prudential indicators as set out in Appendix 2 to the report.

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Non-Executive Report of the: AUDIT COMMITTEE 8 th November 2016	 TOWER HAMLETS
Report of: Zena Cooke, Corporate Director of Resources	Classification: Unrestricted
Mid - Year Review and Activities of Treasury Management Strategy and Investment Strategy for 2016/17	

Originating Officer(s)	Bola Tobun, Investment & Treasury Manager
Wards affected	All wards

Summary

This report reviews progress on the Treasury Management and Investment Strategy that was approved by Full Council on 24 February 2016 as prescribed by the Chartered Institute of Public Finance and Accountancy (CIPFA) Code of Practice on Treasury Management (Revised 2011).

The report reviews how the Treasury Management team has managed the Council's cash balances, investments, borrowings and treasury related risks. The report also sets out the economic environment and how this has impacted on investment returns.

The key messages from this report are that:

- All treasury management activities were executed by authorised officers within the parameters agreed by the Full Council.
- All investments were made to counterparties on the Council's approved lending list and within agreed limits.
- There was no short-term or long-term borrowing raised during the period to 30 September 2016.
- From the beginning of financial to 30 September 2016, the Council earned an average investment return of 0.77% on short term lending, outperforming the rolling average 7 Day LIBID rate of 0.29%.

Recommendations

The Audit Committee is asked to recommend the report to the Council:

To Note -

- The treasury management activities and performance against targets for the six months to 30 September 2016.

- The Council's investment balance of £406.85m as at 30 September 2016 of which £131.62m was invested with money market funds (MMF) and £105m invested with UK Banks and Building Societies as set out in Appendix 1.
- The Council's position on prudential indicators as set out in Appendix 2.

1. REASONS FOR DECISIONS

- 1.1 The Local Government Act 2003 and the Local Authorities (Capital Financing and Accounting) Regulations 2003 requires that regular reports be submitted to Council/Committee detailing the council's treasury management activities.
- 1.2 The Council also agreed as part of the Treasury Management Strategy Statement to receive a number of reports. Furthermore, the CIPFA Treasury Management Code of Practice requires that Full Council/Committee should receive a Mid-Year Report reviewing Treasury Management/Investment.

2. ALTERNATIVE OPTIONS

- 2.1 The Council is bound by legislation to have regard to the CIPFA Treasury Management (TM) Code. The Code requires that the Council should receive a mid-year report reviewing treasury management and investment.
- 2.2 If the Council were to deviate from those requirements, there would need to be some good reason for doing so. It is not considered that there is any such reason, having regard to the need to ensure that Members are kept informed about treasury management activities and to ensure that these activities are in line with the investment strategy approved by the Council

3. DETAILS OF REPORT

- 3.1 The Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury Management (revised November 2011) has been adopted by the Council.
- 3.2 One of the requirements of the Code is that Full Council/Committee should receive an annual Treasury Management Strategy Statement - including the Annual Investment Strategy and Minimum Revenue Provision Policy - for the year ahead, a Mid-Year Review Report and an Annual Outturn Report (stewardship report) covering activities during the previous year.
- 3.3 The Treasury Management Strategy, Investment Strategy and Minimum Revenue Provision reports were included in the Budget Pack that was presented to Full Council on 24 February 2016. The 2015/16 Outturn report was approved by Full Council on 21 September 2016.
- 3.4 This mid - year report has been prepared in compliance with CIPFA's Code of Practice, and covers the following:
 - An economic update for the first six months of 2016/17.
 - A review of the Treasury Management Strategy Statement and Annual Investment Strategy, which constitutes the following:
 - The Council's borrowing strategy for 2016/17.
 - The Council's investment strategy for 2016/17.

- The Council's investment portfolio for 2016/17.
- The Council's capital expenditure (prudential indicators).
- A review of compliance with Treasury and Prudential Limits for 2016/17.

3.5 **AN ECONOMIC UPDATE FOR THE FIRST SIX MONTHS OF 2016/17**

- 3.5.1 UK GDP growth rates in 2013 of 2.2% and 2.9% in 2014 were strong but 2015 was disappointing at 1.8%, though it still remained one of the leading rates among the G7 countries. Growth improved in quarter 4 of 2015 from +0.4% to 0.7% but fell back to +0.4% (2.0% y/y) in quarter 1 of 2016 before bouncing back again to +0.7% (2.1% y/y) in quarter 2. The referendum vote for Brexit in June this year delivered an immediate shock fall in confidence indicators and business surveys, pointing to an impending sharp slowdown in the economy.
- 3.5.2 The Bank of England meeting on August 4th addressed this expected slowdown in growth by a package of measures including a cut in Bank Rate from 0.50% to 0.25%. The Inflation Report included an unchanged forecast for growth for 2016 of 2.0% but cut the forecast for 2017 from 2.3% to just 0.8%.
- 3.5.3 The Inflation Report also included a sharp rise in the forecast for inflation to around 2.4% in 2018 and 2019. CPI has started rising during 2016 as the falls in the price of oil and food twelve months ago fall out of the calculation during the year and, in addition, the post referendum 10% fall in the value of sterling on a trade weighted basis is likely to result in a 3% increase in CPI over a time period of 3-4 years. However, the MPC is expected to look thorough a one off upward blip from this devaluation of sterling in order to support economic growth, especially if pay increases continue to remain subdued and therefore pose little danger of stoking core inflationary price pressures within the UK economy.

3.6. **INTEREST RATE FORECASTS**

The Council's treasury advisor, Capita Asset Services, has provided the following forecast:

	Dec-16	Mar-17	Jun-17	Sep-17	Dec-17	Mar-18	Jun-18	Sep-18	Dec-18	Mar-19	Jun-19
Bank rate	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.25%	0.25%	0.25%	0.25%	0.50%
5yr PWLB rate	1.00%	1.00%	1.10%	1.10%	1.10%	1.10%	1.20%	1.20%	1.20%	1.20%	1.30%
10yr PWLB rate	1.50%	1.50%	1.60%	1.60%	1.60%	1.60%	1.70%	1.70%	1.70%	1.70%	1.80%
25yr PWLB rate	2.30%	2.30%	2.40%	2.40%	2.40%	2.40%	2.50%	2.50%	2.50%	2.50%	2.60%
50yr PWLB rate	2.10%	2.10%	2.20%	2.20%	2.20%	2.20%	2.30%	2.30%	2.30%	2.30%	2.40%

- 3.6.1 Capita Asset Services undertook a quarterly review of its interest rate forecasts after the MPC meeting of 4th August cut Bank Rate to 0.25% and gave forward guidance that it expected to cut Bank Rate again to near zero before the year end. The above

forecast therefore includes a further cut to 0.10% in November this year and a first increase in May 2018, to 0.25%, but no further increase to 0.50% until a year later.

- 3.6.2 The overall longer run trend is for gilt yields and PWLB rates to rise, notwithstanding gently. An eventual world economic recovery may also see investors switching from the safe haven of bonds to equities. However, we have been experiencing exceptional levels of volatility in financial markets which have caused significant swings in PWLB rates. Capita PWLB rate forecasts are based on the Certainty Rate (minus 20 bps).

3.7 TREASURY MANAGEMENT STRATEGY STATEMENT

- 3.7.1 The Treasury Management Strategy Statement (TMSS) for 2016/17 was approved by the Council on 24 February 2016, and it comprised the following:

- Borrowing Strategy
- Minimum Revenue Provision
- Annual Investment Strategy
- Treasury Management Policy statement; and
- Prudential Indicators for Treasury Management

- 3.7.2 The underlying TMSS approved previously requires revision in the light of economic and operational movements during the year. The proposed changes and supporting detail for the changes are set out below and attached as Appendix 2:

<i>Prudential Indicator</i>	<i>2016/17 Original £m</i>	<i>2016/17 Revised £m</i>
Authorised Limit	312.344	313.381
Operational Boundary	292.344	293.381
Capital Financing Requirement	267.344	268.381

Borrowing Strategy

- 3.7.3 The Council's approved borrowing strategy was approved by the full council 24 February 2016. The strategy remains appropriate to meet the Council's financing needs for its capital programme and loan redemptions.

Debt Portfolio

	31 March 2016 Principal £'000	Average rate %	30 September 2016 Principal £'000	Average rate %
Fixed Rate Funding:				
-PWLB	10,325	7.10	10,325	7.10
-Market	0,000		17,500	4.34
Total Fixed Rate Funding	10,325	7.10	27,825	5.36
Variable Rate Funding:				
-PWLB	-		-	
-Market	77,500	4.32	60,000	4.32
Total Variable Rate Funding	77,500	4.32	60,000	4.32
Total Loans	87,825	4.65	87,825	4.65

Other Long Term Liabilities	42,039		42,039	
Total Borrowing	129,864		129,864	
CFR	262,588		262,588	
Over/ (under) borrowing	(132,724)		(132,724)	

3.7.4 The table above sets out the Council's debt as at the beginning of the financial year and 30 September 2016. There is no change to outstanding balance.

3.7.5 During this financial year, two variable rate, market loans have been reclassified as fixed rate market loans. This is because on the 22nd June 2016, Barclays Bank decided to waive their right to change the applicable interest rate of loans. As a result of this waiver, the loans effectively become fixed rate loans at their current interest rates of 4.25% for the £4.5m loan with maturity date of 23/09/2077 and 4.37% for the £13m loan with maturity date of 23/09/2077. And also the risk that the rates will be changed in the future is no longer there.

3.7.6 As at the 30 September 2016, no PWLB loans (Public Works Loans Board) matures.

3.7.7 **Borrowing Requirement:** The Council has an approved borrowing requirement of £13 million towards financing the 2016/17 Capital Programme. This has changed to £14.6m.

3.7.8 Over the next three years, forecasts indicate that investment rates are expected to be below long term borrowing rates. This would indicate that value could best be obtained by avoiding new external borrowing and by using internal cash balances to finance new capital expenditure or to replace any maturing external debt. This would maximise short term savings.

3.7.9 Hence, there has been no new borrowing during the reporting period 01 April 2016 to 30 September 2016. Total debt outstanding, stands at £129.864m, against estimated CFR of £268.381m for 2016/17, resulting in an under-borrowing position of £138.517m

3.7.10 **Debt Rescheduling:** The debt portfolio is periodically reviewed to see if cashflow benefits can be obtained from rescheduling debt. In the current interest rate environment, PWLB repayment rates are generally not favourable and any rescheduling undertaken would incur a large cash penalty payment, thus limiting opportunities. The portfolio will be kept under review and advice sought from Capita Asset Services as appropriate.

3.7.11 No debt rescheduling was undertaken during the first six months of 2016/17.

3.8 Minimum Revenue Provision

3.8.1 The Council has a statutory requirement to repay an element of accumulated General Fund capital expenditure each year through a revenue charge known as the Minimum Revenue Provision (MRP). The Council is required to approve each year a Minimum Revenue Provision Policy Statement and make prudent provision. Revenue Provision to repay General Fund capital expenditure debt for 2016/17 is £6.7 million and has been calculated in accordance with the policy statement.

3.8.2 With regard to assets financed under the Public Finance Initiative (PFI) and finance leases that were brought on balance sheet as a result of the accounting changes brought about by the requirement to report in accordance with International Financial Reporting

Standards, mitigating regulations allow that MRP be contained within the existing revenue charge so that the effect on the General Fund is neutral.

3.9 Annual Investment Strategy.

3.9.1 The Council's Annual Investment Strategy, which is incorporated in the TMSS, outlines the Council's investment priorities as follows:

- Security of capital
- Liquidity; and
- Yield

3.9.2 **Security:** The Council has in place creditworthiness criteria, which the officers had strictly adhered to when making investment decisions during the first six months of 2016/17. Monetary and duration limits are applied to manage counterparty exposure risk. Global markets have remained uncertain and the Council continues to implement an operational investment strategy which tightens the controls already in place within the approved investment strategy. Investment processes are constantly monitored and are regularly reviewed by the Investment and Treasury Manager, Chief Accountant and the Corporate Director of Resources.

3.9.3 **Liquidity:** The Council is required to have available, or have access to, adequate resources to enable it at all times to have the level of funds which are necessary for the achievement of its service objectives. Cashflow modelling is used to meet this requirement. The liquidity of the investment portfolio is monitored regularly.

3.9.4 For debt management purposes the Council has in place overdraft facilities with the Council's banker, the Royal Bank of Scotland plc, and also has access to the PWLB and the money market to fund capital projects. Internal balances are available to temporarily fund capital expenditure. Whilst this will help reduce the need to invest any surplus cash, this must be balanced against the future requirement to replace these balances, and ensure that sufficient cash is available to meet the Council's liquidity requirements.

3.9.5 **Yield:** The Council has a good record in managing its investment portfolio and seeks to obtain the best return (yield) available on its investments, but it adheres at all times to the approved investment criteria. The Council compares the return on its investments against the seven day London Interbank Bid (LIBID) rate, which is the local authority benchmark.

3.9.6 Despite the challenging investment environment, as at 30 September 2016 the return on the Council's investments was 0.77%, which compares very favourably against 0.29%, the average seven day LIBID rate for the reporting period. Officers will continue to work to maintain and strengthen the Council's investment policy and will refer back to the Full Council with any modification thought to be beneficial to the efficient and effective management of the Council's funds.

3.9.7 Credit rating information is supplied by Capita Asset Services, our treasury advisers, on all active counterparties that comply with the criteria as shown at Appendix 3. Any counterparty failing to meet the Council's criteria would be omitted from the counterparty (dealing) list. Any credit rate changes, rating watches (notification of a likely change), rating outlooks (notification of a possible longer term change) are provided to officers almost immediately after they occur and this information is considered before dealing and also used to update the counterparty list.

3.9.8 During the first six months of the year, no short-term or long-term borrowing activities but investments activities have been in line with the Strategy, with no deviations.

3.10 **INVESTMENT PORTFOLIO 2016/17**

- 1) In accordance with the Code, it is the Council's priority to ensure security of capital and liquidity, and to obtain an appropriate level of return which is consistent with the Council's risk appetite. In the current economic climate it is considered appropriate to keep investments short term to cover cash flow needs, but also to seek out value available in longer periods with prudently analytical selected credit rated financial institutions, using the adopted creditworthiness criteria as approved by the Full Council including sovereign credit rating overlay approach.
- 2) Investment rates available in the market have been broadly uncertain during the reporting period and have even gone lower than the previously reported low levels as a result of the MPC to cut rate to 0.25% with other extraordinary measures such as also expanding the Quantitative Easing (QE) programme to £435bn. The level of funds available for investment purposes during the year has been fluctuating between £350m £480m. These funds were available on a temporary basis, and the level of funds available was mainly dependent on the timing of precept payments, receipt of grants and progress on the Capital Programme.
- 3) The Council's budgeted investment return for 2016/17 was £2.7m, with average rate of return 0.9% for average portfolio balances of £300m.

Investment performance for Mid-Year ended 30 September 2016

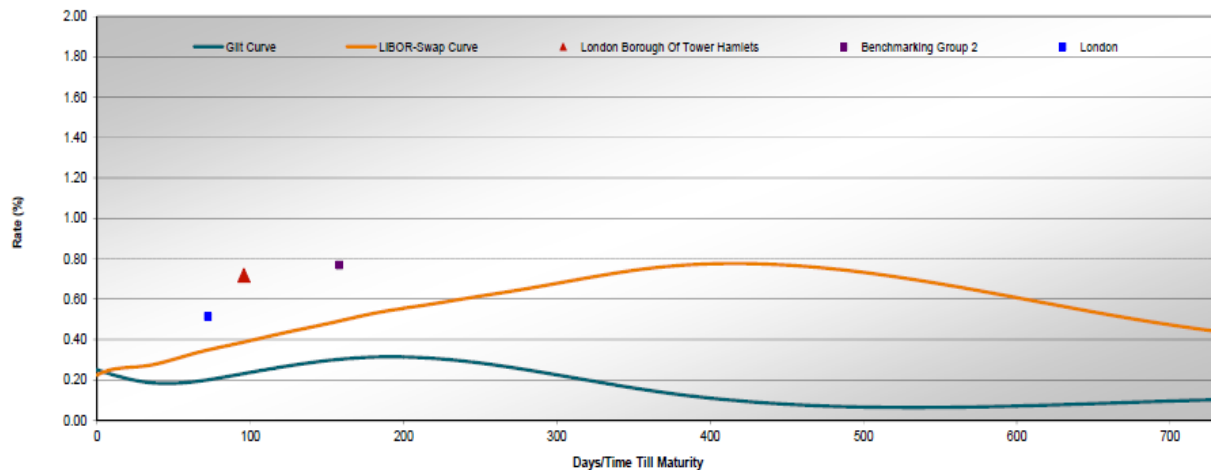
Period	Benchmark Return	LBTH Performance	Over/(Under) Performance	Investment Interest Earned £m
Full Year 2015/2016	0.35%	0.82%	0.47%	3.560
Qtr. 1 2016	0.36%	0.76%	0.40%	N/A
Qtr. 2 2016	0.23%	0.78%	0.55%	N/A
2016/17 Year to Period	0.29%	0.77%	0.48%	1.850

- 4) As illustrated above, the Council held £406.62m of investments as at 30 September 2016 and the investment portfolio yield for the first six months of the year is 0.77% against a benchmark of 0.29%, outperforming the benchmark by 48 bps. The investment interest earned as at 30th September was £1.85m; this was due to the large investment portfolio balances the Council is currently running with, the average investment portfolio balance of £416m as at 30th September 2016.
- 5) It has not been possible to re-invest matured investments at favourably rates due to the ultralow interest rate environment as Bank of England base rate is currently 0.25% with a further cut forecast at 0.10% before the calendar year end.

INVESTMENT BENCHMARKING CLUB

- 6) LBTH participates in a benchmarking club to enable officers to compare the Council's treasury management, investment returns against those of similar authorities. The model below shows the performance of benchmark club members given the various levels of risks taken as at 30 September 2016. The Performance of Tower Hamlets is above the Model Weighted Average Rate of Return (WARoR) but below the performance of our benchmark comparators and the London benchmark.

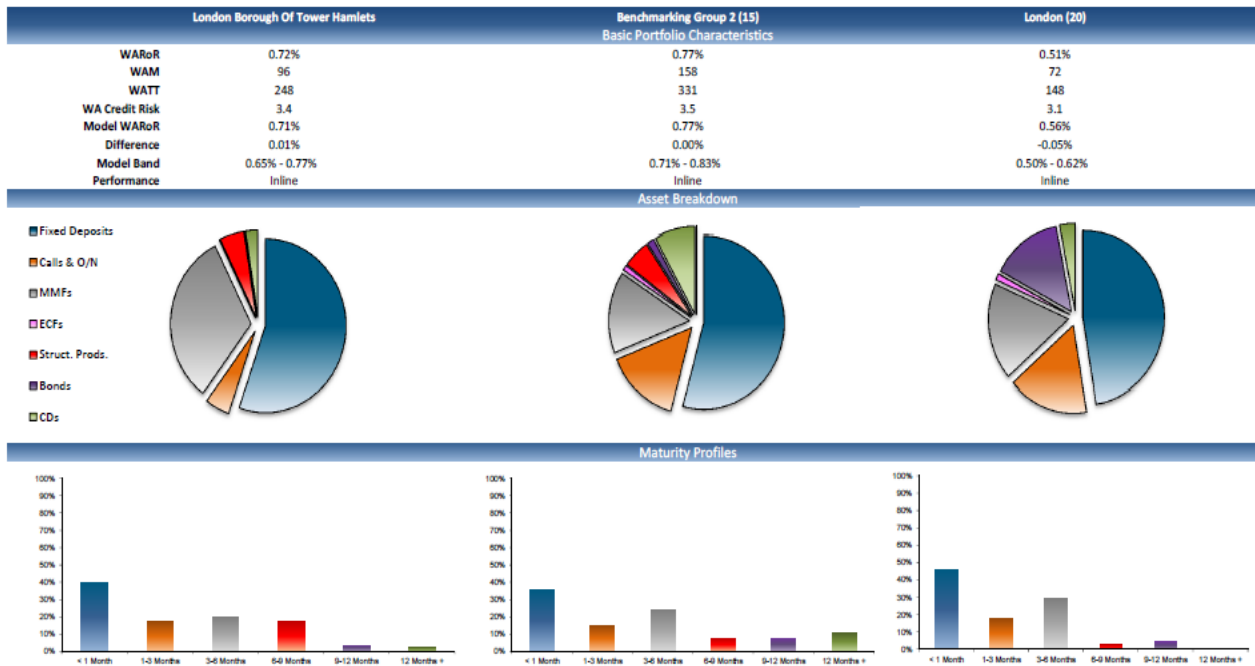
Returns Comparable Against the Risk-Free Rate and LIBOR Curve



	WARoR	WAM	WATT	WARisk	Gilt	LIBOR-Swap	Difference		Model	
							Gilt	LIBOR-Swap	Bands	Performance
London Borough Of Tower Hamlets	0.72%	96	248	3.4	0.23%	0.39%	0.49%	0.33%	0.65% - 0.77%	Inline
Benchmarking Group 2	0.77%	158	331	3.5	0.30%	0.49%	0.47%	0.28%	0.71% - 0.83%	Inline
London	0.51%	72	148	3.1	0.20%	0.35%	0.31%	0.17%	0.50% - 0.62%	Inline

London Borough Of Tower Hamlets

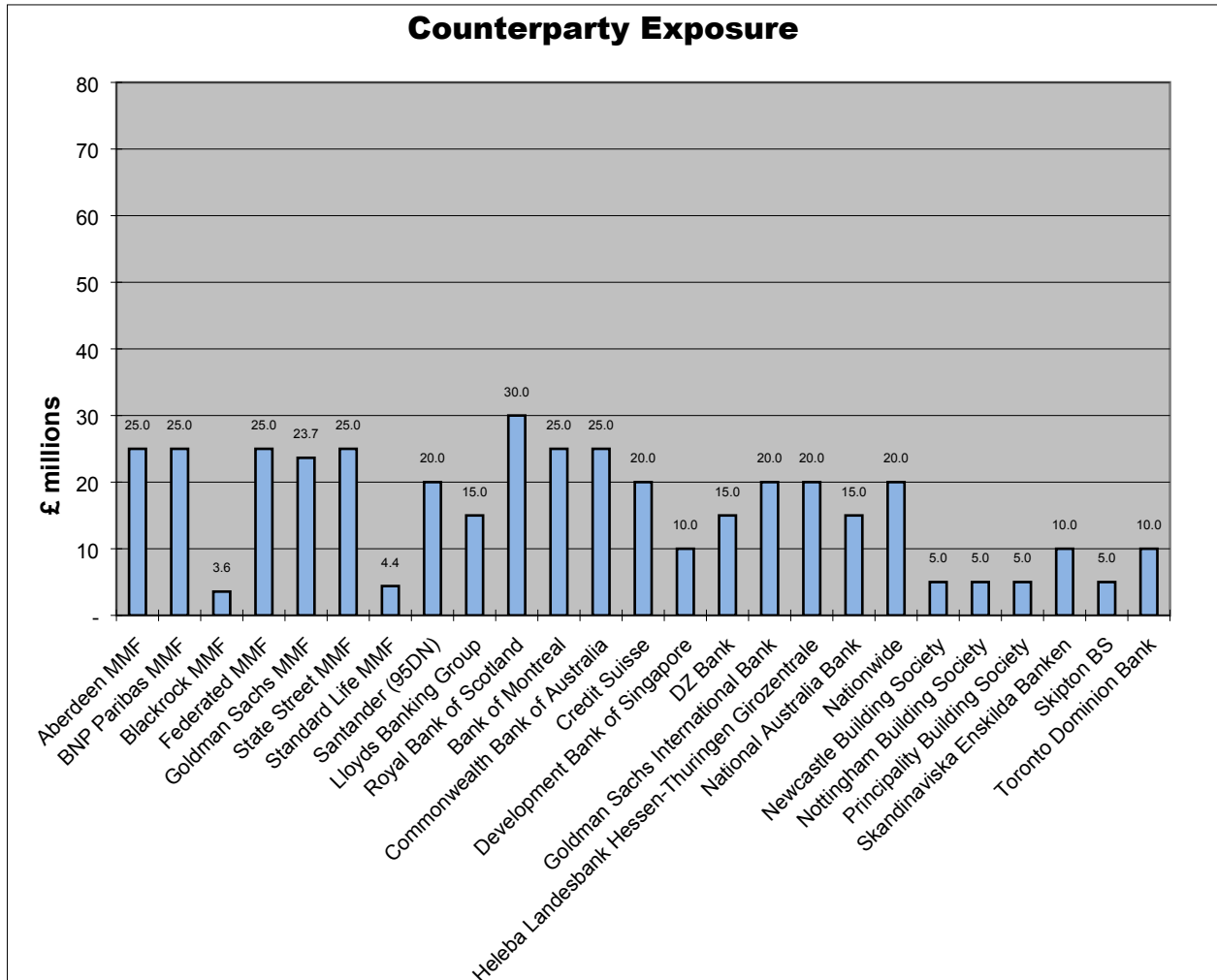
Summary Sheet



- 7) The return on LBTH investment is commensurate with the Council's risk appetite as set out in the Investment Strategy which is reflected in the above data.
- 8) The outstanding investments of £406.62m include Pension Fund working capital of some £7.78m which is being invested and will continue to be invested in accordance with the Council's Treasury Management Strategy agreed by Full Council, under the delegated authority of the Corporate Director of Resources to manage within agreed parameters.
- 9) The table below shows the amount of investments outstanding at the end of September 2016, split according to the financial sector.

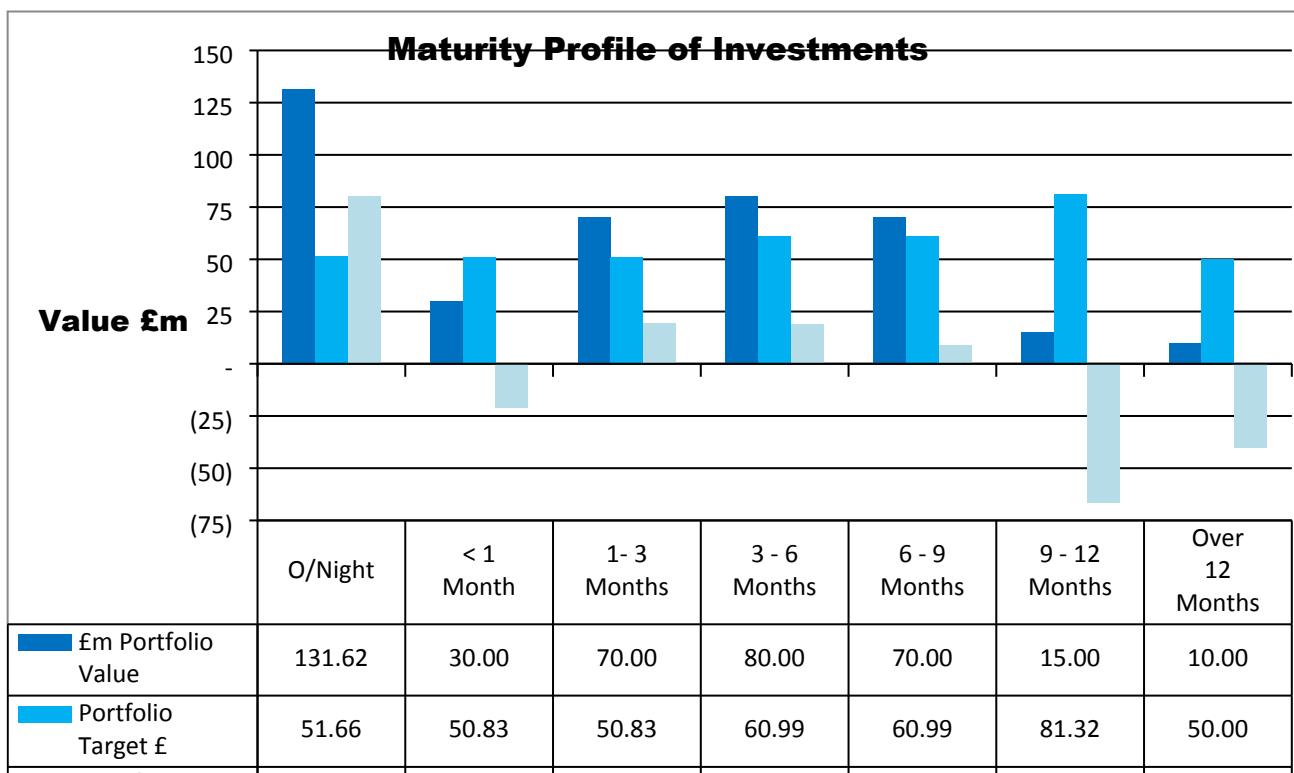
FINANCIAL SECTOR	£m	%
Banks in the UK	65.00	15.98
Building Societies in the UK	40.00	9.84
Banks in the Rest of the World	170.00	41.81
Money Market Funds	131.62	32.37
Investments Outstanding as at 30/09/2016	406.62	100.00

10) The below chart shows the deposits outstanding with authorised counterparties as at 30th September 2016, of which 7.38% were with part-nationalised banks (RBS Groups).



11) The chart below illustrates the maturity profile of investments at the end of September 2016 with the detailed list of investments attached as Appendix 1 of this report.

Maturity Structure of Investments



- 12) We have £131.62m as overnight deposits, and this is essentially all Money Market Funds. The Weighted Average Maturity (WAM) for outstanding investment (excluding MMF) is 144 days for the month of September and including MMF is 96 days. This is the average number of outstanding days to maturity of each deal from 30 September 2016.
- 13) **Compliance with Treasury and Prudential Limits** - It is a statutory duty for the Council to determine and keep under review the affordable borrowing limits. The Council's approved Treasury and Prudential Indicators (affordability limits) are included in the approved TMSS.
- 14) For the financial year to reporting period the Council has operated within the treasury and prudential indicators set out in the Council's Treasury Management Strategy Statement and in compliance with the Council's Treasury Management Practices. The prudential and treasury Indicators are shown in Appendix 2.

General Activities Update

- 15) UK Sovereign Rating - Standard & Poor have downgraded the UK Sovereign rating to AA from AAA with outlook remains negative, Fitch downgraded to AA from AA+ with outlook, changed to negative from stable, Moody's affirmed the rating at Aa1 with outlook changed to negative from stable. This is due to weaker economic and fiscal outlook.
- 16) In light of the recent changes in the UK sovereign rating, the Council did not exclude UK from its sovereign rating overlay criteria and still invest in UK banks and building societies. At the individual/entity level, investment counterparties still need to meet stringent criteria as laid out in the current investment strategy.

- 17) Section 7.27 of the council treasury management strategy for 2016/17, TMSS annex A, was revised at the full council meeting of September 2016, by revising the maximum nominal value of overall investments that the council should hold for more than 1 year and less than 5 years from £50m to £100m (that is Investments with maturity over a year) The prudential indicator figure of £100m was therefore approved.
- 18) The Council also changed the monetary limit and duration of investments more than one year for part nationalised bank from the original strategy limits of £25m and 3 years to £50m and 5 years duration. This is to empower the council the flexibility of placing more deposits with institution part owned by the government and be in a position to received decent return from the transaction.

3.11 **The Council's Capital Position (Prudential Indicators)**

3.11.1 Prudential Indicator for Capital Expenditure - This table shows the revised estimates for capital expenditure and the changes since the capital programme was agreed at February Council. The programme has been revised to take account of updated profiles; new schemes approved in-year and new capital grant receipts.

Capital Expenditure by Service	2016/17 Original Estimate £m	2016/17 Revised Estimate £m
<i>Adult Services</i>	5.046	7.442
<i>Children's services</i>	31.875	18.119
<i>Building Schools for the Future</i>		0.290
<i>Communities, Localities and Culture</i>	12.348	11.372
<i>Development & Renewal (Excluding HRA)</i>	5.676	3.628
<i>Housing</i>	139.045	95.298
<i>Corporate General Fund Provision for Schemes under development</i>	34.000	
Total Non - HRA	89.475	77.362
HRA	138.315	92.991
Total	227.790	170.353

3.11.2 **Changes to the Financing of the Capital Programme**

The table below draws together the main strategic elements of the capital expenditure plans, highlighting the original supported and unsupported elements of the capital programme, and the expected financing arrangements. The borrowing element of the table increases the underlying indebtedness of the Council by way of the Capital Financing Requirement (CFR), although this will be reduced in part by revenue charges for the repayment of debt (the Minimum Revenue Provision).

Capital Expenditure	2016/17 Original Estimate £m	2016/17 Revised Estimate £m
Total Spend	227.790	170.353
Financed By:		
Capital receipts	45.449	21.821
Capital Grants, Developers & SC	131.073	67.280
Major Repairs Allowance	32.860	40.160
Capital Reserves	3.400	
Revenue	2.000	23.527
Total Financing	214.980	155.788
Supported	0.000	0.000
Unsupported	13.010	14.565
Total Borrowing Need	13.010	14.565

3.11.3 Changes to the Prudential Indicators for the Capital Financing Requirement, External Debt and the Operational Boundary are detailed in the below table. The Capital Financing Requirement has been amended in line with the borrowing requirement to support the 2016/17 approved capital programme.

	2015/16 Actual £m	2016/17 Original Estimate £m	2016/17 Revised Estimate £m
Prudential Indicator – Capital Financing Requirement			
CFR – Non-HRA	192.913	187.096	186.813
CFR – HRA	69.675	80.248	81.567
Total CFR	262.588	267.344	268.381
Net movement in CFR		4.756	5.793
Prudential Indicator – External Debt / the Operational Boundary			
Borrowing	245.549	251.510	252.547
Other long term liabilities	42.039	40.834	40.834
Total debt 31 March	287.588	292.344	293.381

Limits to Borrowing Activity

3.11.4 The first key control over the treasury activity is a prudential indicator to ensure that over the medium term, net borrowing (borrowings less investments) will only be for a capital purpose. Net external borrowing should not, except in the short term, exceed the total of CFR in the preceding year plus the estimates of any additional CFR for

2016/17 and next two financial years. This allows some flexibility for limited early borrowing for future years.

	2015/16 Actual £m	2016/17 Original Estimate £m	2016/17 Revised Estimate £m
Gross borrowing	129.864	139.780	141.335
Less investments	479.302	300.000	350.000
Net borrowing / (Investments)	(349.438)	(160.220)	(208.665)
CFR (year - end position)	262.588	267.344	268.381

3.11.5 The Corporate Director, Resources reports that no difficulties are envisaged for the current or future years in complying with this prudential indicator.

3.11.6 A further prudential indicator limits the overall level of borrowing. This is the Authorised Limit which represents the limit beyond which borrowing is prohibited, and can only be set and revised by Members. It reflects the level of borrowing which though not needed, could be afforded in the short term but unsustainable long term. It is the expected maximum borrowing need with some headroom for unexpected movements. This is the statutory limit determined under section 3 (1) of the Local Government Act 2003.

	2016/17 Original Indicator	2016/17 Revised Indicator
Authorised limit for external debt		
Borrowing*	292.344	293.381
Headroom	20.000	20.000
Other long term liabilities	0.000	0.000
Total	312.344	313.381

* Includes PFI schemes and finance leases etc.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

4.1 The comments of the Corporate Director of Resources are incorporated in the report.

5. LEGAL COMMENTS

5.1 The Local Government Act 2003 provides a framework for the capital finance of local authorities. It provides a power to borrow and imposes a duty on local authorities to determine an affordable borrowing limit. It provides a power to invest. Fundamental to the operation of the scheme is an understanding that authorities will have regard to proper accounting practices recommended by the Chartered Institute of Public Finance and Accountancy (CIPFA) in carrying out capital finance functions.

- 5.2 The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 require the Council to have regard to the CIPFA publication “Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes” (“the Treasury Management Code”) in carrying out capital finance functions under the Local Government Act 2003. If after having regard to the Treasury Management Code the Council wished not to follow it, there would need to be some good reason for such deviation.
- 5.3 It is a key principle of the Treasury Management Code that an authority should put in place “comprehensive objectives, policies and practices, strategies and reporting arrangements for the effective management and control of their treasury management activities”. Treasury management activities cover the management of the Council’s investments and cash flows, its banking, money market and capital market transactions, the effective control of risks associated with those activities and the pursuit of optimum performance consistent with those risks. It is consistent with the key principles expressed in the Treasury Management Code for the Council to review performance against the strategies and policies it has adopted.
- 5.4 The Treasury Management Code requires as a minimum that there be a practice of regular reporting on treasury management activities and risks to the responsible committee and that these should be scrutinised by that committee. Under the Council’s Constitution, the audit committee has the functions of monitoring the Council’s risk management arrangements and making arrangements for the proper administration of the Council’s affairs and for the proper stewardship of public funds.
- 5.5 When discharging its treasury management functions, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who don’t. Information is contained in section 15 of the report relevant to these considerations.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 Interest on the Council’s cash flow has historically contributed significantly towards the budget. This Council’s ability to deliver its various functions, to meet its Community Plan targets and to do so in accordance with its obligations under the Equality Act 2010 may thus be enhanced by sound treasury management.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 Assessment of value for money is achieved through:
- Monitoring against benchmarks
 - Operating within budget
- 7.2 For example, investment returns exceeded the LIBID benchmark up to the end of September 2016 and the treasury function operated within budget for financial year 2016/17.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 There are no Sustainable Actions for A Greener Environment implications.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 Any form of investment inevitably involves a degree of risk. To minimise risk the investment strategy has for example a restriction exposure of council cash balances to non-UK banks or institutions only with sovereign rating of AAA, with prudent short term rating or strong long term rating of individual institution.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 There are no crime and disorder reduction implications arising from this report.

Linked Reports, Appendices and Background Documents: None

Appendices

Appendix 1: Investment Portfolio as at 30th September 2016

Appendix 2: 2016-17 Revised Prudential and Treasury Management Indicators

Appendix 3: Counterparty List

Appendix 4: Glossary

Local Government Act, 1972 Section 100D (As amended)

List of “Background Papers” used in the preparation of this report

Capita Treasury Advisory Services - Investment Reports & Benchmarking club report

Officer contact details for documents:

Bola Tobun Ext. 4733 Mulberry Place, 3rd Floor

Investments Outstanding at 30 September 2016

Maturity	Counterparty	From	Maturity	Amount £m	Rate
Overnight	Aberdeen MMF		MMF	25.00	
	BNP Paribas MMF		MMF	25.00	
	Blackrock MMF		MMF	3.57	
	Federated MMF		MMF	25.00	
	Goldman Sachs MMF		MMF	23.65	
	Standard Life MMF		MMF	4.40	
	State Street MMF		MMF	25.00	
	SUB TOTAL			131.62	
<1 Month	DZ Bank	04/07/2016	04/10/2016	10.00	0.51%
	Skandinaviska Enskilda Banken	05/10/2015	05/10/2016	5.00	0.92%
	DZ Bank	05/04/2016	05/10/2016	5.00	0.68%
	Goldman Sachs International Bank	23/10/2015	24/10/2016	10.00	1.00%
	SUB TOTAL			30.00	
1 - 3 Months	Heleba Landesbank Hessen-Thüringen	12/11/2015	11/11/2016	5.00	1.04%
	Principality Building Society	11/11/2015	11/11/2016	5.00	1.08%
	Goldman Sachs International Bank	12/11/2015	14/11/2016	10.00	0.95%
	Credit Suisse	20/11/2015	18/11/2016	10.00	1.03%
	Credit Suisse	25/11/2015	25/11/2016	10.00	1.00%
	Skandinaviska Enskilda Banken	07/12/2015	07/12/2016	5.00	0.85%
	Development Bank of Singapore	08/06/2016	08/12/2016	5.00	0.62%
	Bank of Montreal	15/03/2016	15/12/2016	10.00	0.72%
	Commonwealth Bank of Australia	15/12/2015	15/12/2016	5.00	0.91%
	Development Bank of Singapore	15/06/2016	15/12/2016	5.00	0.62%
	Heleba Landesbank Hessen-Thüringen	12/11/2015	11/11/2016	5.00	1.04%
		SUB TOTAL			70.00
3 - 6 Months	Santander (95DN)		Call - 95N	20.00	1.10%
	Bank of Montreal	06/04/2016	06/01/2017	10.00	0.75%
	Royal Bank of Scotland	10/01/2014	09/01/2017	5.00	1.74%
	National Australia Bank	12/04/2016	12/01/2017	10.00	0.74%
	National Australia Bank	19/04/2016	19/01/2017	5.00	0.75%
	Bank of Montreal	19/04/2016	19/01/2017	5.00	0.74%
	Commonwealth Bank of Australia	23/02/2016	21/02/2017	5.00	0.90%
	Heleba Landesbank Hessen-Thüringen	26/02/2016	27/02/2017	5.00	0.92%
	Commonwealth Bank of Australia	14/03/2016	14/03/2017	10.00	0.92%
	Skipton BS	23/03/2016	23/03/2017	5.00	1.02%
		SUB TOTAL			80.00
6 - 9 Months	Nationwide	12/04/2016	12/04/2017	5.00	0.95%
	Lloyds Banking Group	14/04/2016	13/04/2017	5.00	1.05%
	Lloyds Banking Group	15/04/2016	13/04/2017	5.00	1.05%
	Nationwide	15/04/2016	13/04/2017	10.00	0.97%
	Nationwide	22/04/2016	21/04/2017	5.00	0.95%
	Newcastle Building Society	28/04/2016	28/04/2017	5.00	1.15%
	Lloyds Banking Group	29/04/2016	28/04/2017	5.00	1.05%
	Royal Bank of Scotland	05/05/2015	05/05/2017	5.00	1.45%
	Royal Bank of Scotland	08/05/2015	08/05/2017	5.00	1.45%
	Nottingham Building Society	09/05/2016	09/05/2017	5.00	1.03%
	Commonwealth Bank of Australia	12/05/2016	12/05/2017	5.00	0.99%
Heleba Landesbank Hessen-Thüringen	03/05/2016	03/06/2017	10.00	1.01%	
	SUB TOTAL			70.00	

9 - 12 Months	Toronto Dominion Bank	16/08/2016	15/08/2017	10.00	0.61%
	Royal Bank of Scotland	19/08/2016	19/08/2017	5.00	0.86%
	SUB TOTAL			25.00	
Maturity	Counterparty	From	Maturity	Amount £m	Rate
> 12 Months	Royal Bank of Scotland	30/01/2015	30/01/2018	5.00	1.20%
	Royal Bank of Scotland	30/04/2015	30/04/2018	5.00	0.90%
	SUB TOTAL			10.00	
	GRAND TOTAL			406.62	

2016-17 Revised Prudential and Treasury Management Indicators

Prudential Indicators	2015/16	2016/17	2016/17	2017/18	2018/19
Extract from Estimate and rent setting reports	Actual	Original Estimate	Revised Estimate	Estimate	Estimate
	£m	£m	£m	£m	£m
Capital Expenditure					
Non – HRA	26.620	89.475	77.362	47.149	10.616
HRA	66.359	138.315	92.991	70.301	87.217
TOTAL	92.979	227.790	170.353	117.450	97.833
Ratio of Financing Costs To Net Revenue Stream					
Non – HRA	0.30%	0.33%	0.00%	0.00%	0.00%
HRA	3.70%	3.69%	4.42%	4.43%	8.16%
	£m	£m	£m	£m	£m
Gross Debt and Capital Financing Requirement					
Gross Debt	129.864	139.780	141.335	124.452	192.323
Capital Financing Requirement	262.588	267.344	268.381	259.644	321.946
Over/(Under) Borrowing	(132.724)	(127.564)	(127.046)	(135.192)	(129.624)
In Year Capital Financing Requirement					
Non – HRA	0.145	0.150	0.355	0.000	0.000
HRA	0.000	12.860	14.210	0.000	70.999
TOTAL	0.145	13.010	14.565	0.000	70.999
Capital Financing Requirement as at 31 March					
Non - HRA	192.913	187.096	186.813	180.394	174.011
HRA	69.675	80.248	81.567	79.250	147.935
TOTAL	262.588	267.344	268.381	259.644	321.946
Incremental Impact of Financing Costs (£)					
Increase in Council Tax (band D) per annum	67.317	101.444	73.130	80.534	84.610
Increase in average housing rent per week	5.176	5.261	6.452	6.550	12.102

Treasury Management Indicators	2014/15	2015/16	2015/16	2016/17	2017/18
	Actual	Original Estimate	Revised Estimate	Estimate	Estimate
	£m	£m	£m	£m	£m
Authorised Limit For External Debt -					
Borrowing & Other long term liabilities	245.720	323.828	292.349	326.700	327.089
Headroom	20.000	20.000	20.000	20.000	20.000
TOTAL	265.720	343.828	312.349	346.700	347.089
Operational Boundary For External Debt -					
Borrowing	206.310	285.356	253.877	289.192	290.786
Other long term liabilities	39.410	38.472	38.472	37.508	36.303
TOTAL	245.720	323.828	292.349	326.700	327.089
Gross Borrowing	136.700	162.789	127.117	159.979	157.416
HRA Debt Limit*	184.381	192.000	192.000	192.000	192.000
Upper Limit For Fixed Interest Rate Exposure					
Net principal re fixed rate borrowing / investments	100%	100%	100%	100%	100%
Upper Limit For Variable Rate Exposure					
Net interest payable on variable rate borrowing / investments	20%	20%	20%	20%	20%
Upper limit for total principal sums invested for over 364 days (per maturity date)	£50m	£50m	£50m	£50m	£50m

Maturity structure of new fixed rate borrowing during 2015/16	Upper Limit	Lower Limit
under 12 months	10%	0%
12 months and within 24 months	30%	0%
24 months and within 5 years	40%	0%
5 years and within 10 years	80%	0%
10 years and above	100%	0%

List of Approved Counterparties for Lending for London Borough of Tower Hamlets.

Any values highlighted in yellow have undergone a change in the past 14 days.

Counterparty	Fitch Ratings			Moody's Ratings			S&P Ratings		
	Long Term	Short Term		Long Term	Short Term		Long Term	Short Term	
Australia	SB	AAA		SB	Aaa		NO	AAA	
Banks									
Australia and New Zealand Banking Group Ltd.	SB	AA-	F1+	NO	Aa2	P-1	NO	AA-	A-1+
Commonwealth Bank of Australia	SB	AA-	F1+	NO	Aa2	P-1	NO	AA-	A-1+
Macquarie Bank Ltd.	SB	A	F1	SB	A2	P-1	SB	A	A-1
National Australia Bank Ltd.	SB	AA-	F1+	NO	Aa2	P-1	NO	AA-	A-1+
Westpac Banking Corp.	SB	AA-	F1+	NO	Aa2	P-1	NO	AA-	A-1+
Canada	SB	AAA		SB	Aaa		SB	AAA	
Banks									
Bank of Montreal	SB	AA-	F1+	NO	Aa3	P-1	SB	A+	A-1
Bank of Nova Scotia	SB	AA-	F1+	NO	Aa3	P-1	SB	A+	A-1
Canadian Imperial Bank of Commerce	SB	AA-	F1+	NO	Aa3	P-1	SB	A+	A-1
National Bank of Canada	SB	A+	F1	NO	Aa3	P-1	SB	A	A-1
Royal Bank of Canada	NO	AA	F1+	NO	Aa3	P-1	NO	AA-	A-1+
Toronto-Dominion Bank	SB	AA-	F1+	NO	Aa1	P-1	SB	AA-	A-1+
Denmark	SB	AAA		SB	Aaa		SB	AAA	
Banks									
Danske A/S	SB	A	F1	PO	A1	P-1	SB	A	A-1
Germany	SB	AAA		SB	Aaa		SB	AAA	
Banks									
DZ BANK AG Deutsche Zentral-Genossenschaftsbank	SB	AA-	F1+	SB	Aa1	P-1	SB	AA-	A-1+

	Landesbank Berlin AG				PO	Aa3	P-1			
	Landesbank Hessen-Thueringen Girozentrale	SB	A+	F1+	SB	Aa3	P-1	SB	A	A-1
	Landwirtschaftliche Rentenbank	SB	AAA	F1+	SB	Aaa	P-1	SB	AAA	A-1+
	NRW.BANK	SB	AAA	F1+	SB	Aa1	P-1	SB	AA-	A-1+
Netherlands		SB	AAA		SB	Aaa		SB	AAA	
Banks	ABN AMRO Bank N.V.	SB	A+	F1	SB	A1	P-1	SB	A	A-1
	Bank Nederlandse Gemeenten N.V.	SB	AA+	F1+	SB	Aaa	P-1	SB	AAA	A-1+
	Cooperatieve Rabobank U.A.	SB	AA-	F1+	SB	Aa2	P-1	SB	A+	A-1
	ING Bank N.V.	SB	A+	F1	SB	A1	P-1	SB	A	A-1
	Nederlandse Waterschapsbank N.V.				SB	Aaa	P-1	SB	AAA	A-1+
Singapore		SB	AAA		SB	Aaa		SB	AAA	
Banks	DBS Bank Ltd.	SB	AA-	F1+	NO	Aa1	P-1	SB	AA-	A-1+
	Oversea-Chinese Banking Corp. Ltd.	SB	AA-	F1+	NO	Aa1	P-1	SB	AA-	A-1+
	United Overseas Bank Ltd.	SB	AA-	F1+	NO	Aa1	P-1	SB	AA-	A-1+
Sweden		SB	AAA		SB	Aaa		SB	AAA	
Banks	Nordea Bank AB	SB	AA-	F1+	SB	Aa3	P-1	NO	AA-	A-1+
	Skandinaviska Enskilda Banken AB	SB	AA-	F1+	SB	Aa3	P-1	SB	A+	A-1
	Svenska Handelsbanken AB	SB	AA	F1+	SB	Aa2	P-1	NO	AA-	A-1+
	Swedbank AB	SB	AA-	F1+	SB	Aa3	P-1	NO	AA-	A-1+
Switzerland		SB	AAA		SB	Aaa		SB	AAA	
Banks	Credit Suisse AG	SB	A	F1	SB	A1	P-1	SB	A	A-1
	UBS AG	SB	A+	F1	SB	Aa3	P-1	SB	A+	A-1
United Kingdom										

		N O	AA		N O	Aa1		NO	AA	
AAA rated and Government backed securities Banks	Debt Management Office									
	Bank of Scotland PLC	SB	A+	F1	SB	A1	P-1	NO	A	A-1
	Close Brothers Ltd	SB	A	F1	SB	Aa3	P-1			
	Co-operative Bank PLC (The)	SB	B	B	PO	Caa 2	NP			
	Goldman Sachs International Bank	PO	A	F1	SB	A1	P-1	P W	A	A-1
	HSBC Bank PLC	SB	AA-	F1 +	N O	Aa2	P-1	NO	AA-	A-1+
	Lloyds Bank Plc	SB	A+	F1	SB	A1	P-1	NO	A	A-1
	Santander UK PLC	PO	A	F1	N O	Aa3	P-1	NO	A	A-1
	Standard Chartered Bank	SB	A+	F1	N O	Aa3	P-1	PO	A	A-1
	Sumitomo Mitsui Banking Corporation Europe Ltd	N O	A	F1	SB	A1	P-1	SB	A	A-1
	UBS Ltd.	SB	A+	F1	SB	A1	P-1	SB	A+	A-1
Ulster Bank Ltd	SB	BBB +	F2	PO	A3	P-2	SB	BBB	A-2	
Building Society	Coventry Building Society	SB	A	F1	N O	A2	P-1			
	Cumberland Building Society									
	Leeds Building Society	SB	A-	F1	N O	A2	P-1			
	National Counties Building Society									
	Nationwide Building Society	PO	A	F1	N O	Aa3	P-1	NO	A	A-1
	Newcastle Building Society	SB	WD	WD						
	Nottingham Building Society				N O	Baa1	P-2			
	Principality Building Society	SB	BBB +	F2	SB	Baa3	P-3			
	Progressive Building Society									
	Skipton Building Society	SB	A-	F1	PO	Baa2	P-2			

	West Bromwich Building Society				SB	B1	NP			
	Yorkshire Building Society	SB	A-	F1	SB	A3	P-2			
Nationalised and Part Nationalised Banks	National Westminster Bank PLC	SB	BBB+	F2	PO	A3	P-2	SB	BBB+	A-2
	The Royal Bank of Scotland Plc	SB	BBB+	F2	PO	A3	P-2	SB	BBB+	A-2

Advisory notes:

Local Authorities - £20 Million per LA

Money Market Funds- £25 Million per Fund

Standard Banks up to 3 - 5 years - £25 Million or 1 year - £30 Million

Part Nationalised Banks 5 years - £50 Million or 1 year - £70 Million

Glossary

Asset Life	How long an asset, e.g. a Council building is likely to last.
Borrowing Portfolio	A list of loans held by the Council.
Borrowing Requirements	The principal amount the Council requires borrowing to finance capital expenditure and loan redemptions.
Capitalisation direction or regulations	Approval from central government to fund certain specified types of revenue expenditure from capital resources.
CIPFA Code of Practice on Treasury Management	A professional code of Practice which regulates treasury management activities.
Capital Financing Requirement (CFR)	Capital Financing Requirement- a measure of the Council's underlying need to borrow to fund capital expenditure.
Certificates of Deposits	A certificate of deposit (CD) is a time deposit, a financial product. CDs are similar to savings accounts in that they are insured and thus virtually risk free; they are "money in the bank." They are different from savings accounts in that the CD has a specific, fixed term (often monthly, three months, six months, or one to five years) and, usually, a fixed interest rate. It is intended that the CD be held until maturity, at which time the money may be withdrawn together with the accrued interest.
Commercial paper	Commercial paper is a money-market security issued (sold) by large corporations to obtain funds to meet short-term debt obligations (for example, payroll), and is backed only by an issuing bank or corporation's promise to pay the face amount on the maturity date specified on the note. Since it is not backed by collateral, only firms with excellent credit ratings from a recognized credit rating agency will be able to sell their commercial paper at a reasonable price. Commercial paper is usually sold at a discount from face value, and carries higher interest repayment rates than bonds
Counterparties	Organisations or Institutions the Council lends money to e.g. Banks; Local Authorities and MMF.
Corporate bonds	A corporate bond is a bond issued by a corporation. It is a bond that a corporation issues to raise money effectively in order to expand its business. The term is usually applied to longer-term debt instruments, generally with a maturity date falling at least a year after their issue date.
Covered bonds	A covered bond is a corporate bond with one important enhancement: recourse to a pool of assets that secures or "covers" the bond if the originator (usually a financial institution) becomes insolvent. These assets act as additional credit cover; they do not have any bearing on the contractual cash flow to the investor, as is the case with Securitized assets.
Consumer Prices Index & Retail Prices Index (CPI & RPI)	The main inflation rate used in the UK is the CPI. The Chancellor of the Exchequer bases the UK inflation target on the CPI. The CPI inflation target is set at 2%. The CPI differs from the RPI in that CPI excludes housing costs. Also used

	is RPIX, which is a variation of RPI, one that removes mortgage interest payments.
Credit Default Swap (CDS)	A kind of protection that can be purchased by MMF companies from insurance companies (for their investment) in exchange for a payoff if the organisation they have invested in does not repay the loan i.e. they default.
Credit watch	Variety of special programs offered by credit rating agencies and financial institutions to monitor organisation/individual's (e.g. bank) credit report for any credit related changes. A credit watch allows the organisation/individuals to act on any red flags before they can have a detrimental effect on credit score/history.
Credit Arrangements	Methods of Financing such as finance leasing
Credit Ratings	A scoring system issued by credit rating agencies such as Fitch, Moody's and Standard & Poors that indicate the financial strength and other factors of a bank or similar institution.
Creditworthiness	How highly rated an institution is according to its credit rating.
Debt Management Office (DMO)	The DMO is an agency of the HM Treasury which is responsible for carrying out the Government's Debt Management Policy.
Debt Rescheduling	The refinancing of loans at different terms and rates to the original loan.
Depreciation Method	The spread of the cost of an asset over its useful life.
Gross domestic product (GDP)	Gross domestic product (GDP) is a measure of the size of an economy. It is defined as "an aggregate measure of production equal to the sum of the gross values added of all resident, institutional units engaged in production (plus any taxes, and minus any subsidies, on products not included in the value of their outputs)" by the OECD. GDP estimates are commonly used to measure the economic performance of a whole country or region, but can also measure the relative contribution of an industry sector.
Gilt	Gilt-edged securities are bonds issued by certain national governments. The term is of British origin, and originally referred to the debt securities issued by the Bank of England, which had a gilt (or gilded) edge. Hence, they are known as gilt-edged securities, or gilts for short. Today the term is used in the United Kingdom as well as some Commonwealth nations, such as South Africa and India. However, when reference is made to "gilts", what is generally meant is "UK gilts," unless otherwise specified.
Interest Rate exposures	A measure of the proportion of money invested and what impact movements in the financial markets would have on them.
The International Monetary Fund (IMF)	is an intergovernmental organisation which states its aims as to foster global monetary cooperation, secure financial stability, facilitate international trade, promote high employment and sustainable economic growth, and reduce

Impaired investment	poverty around the world. An investment that has had a reduction in value to reflect changes that could impact significantly on the benefits expected from it.
LIBID	The London Interbank Bid Rate – it is the interest rate at which major banks in London are willing to borrow (bid for) funds from each other.
Market Loans	Loans from banks available from the London Money Market including LOBOS (Lender Option, Borrowing Option) which enable the authority to take advantage of low fixed interest for a number of years before an agreed variable rate comes into force.
Money Market Fund (MMF)	A ‘pool’ of different types of investments managed by a fund manager that invests in lightly liquid short term financial instruments with high credit rating.
Monetary Policy Committee (MPC)	Committee designated by the Bank of England, whose main role is to regulate interest rates.
Minimum Revenue Provision (MRP)	This is the amount which must be set aside from the revenue budget each year to cover future repayment of loans.
Non Specified Investments The Organisation for Economic Co-operation and Development (OECD)	Investments deemed to have a greater element of risk such as investments for longer than one year The Organisation for Economic Co-operation and Development (OECD) is an international economic organisation of 34 countries, founded in 1961 to stimulate economic progress and world trade. It is a forum of countries describing themselves as committed to democracy and the market economy, providing a platform to compare policy experiences, seeking answers to common problems, identify good practices and coordinate domestic and international policies of its members.
Premium	Cost of early repayment of loan to PWLB to compensate for any losses that they may incur
Prudential Indicators	Set of rules providing local authorities borrowing for funding capital projects under a professional code of practice developed by CIPFA and providing measures of affordability and prudence reflecting the Council’s Capital Expenditure, Debt and Treasury Management.
PWLB	Public Works Loan Board, a statutory body whose function is to lend money to Local Authorities (LAs) and other prescribed bodies. The PWLB normally are the cheapest source of long term borrowing for LAs.
Specified Investments	Investments that meet the Council’s high credit quality criteria and repayable within 12 months.
Supranational bonds	Supranational bonds are issued by institutions that represent a number of countries, not just one. Thus, organisations that issue such bonds tend to be the World Bank or the European Investment Bank. The issuance of these bonds are for the purpose of promoting economic development
Treasury bills (or T-bills)	Treasury bills (or T-bills) mature in one year or less. Like


zero-coupon bonds, they do not pay interest prior to maturity; instead they are sold at a discount of the par value to create a positive yield to maturity. Many regard Treasury bills as the least risky investment available.

Unrated institution

An institution that does not possess a credit rating from one of the main credit rating agencies.

Unsupported Borrowing

Borrowing where costs are wholly financed by the Council.

Non-Executive Report of the: Council 5 December 2016	 TOWER HAMLETS
Report of: Graham White, Acting Corporate Director, Law Probity & Governance	Classification: Unrestricted
Revised Code of Conduct for Members and Revised Arrangements for Dealing with Alleged Breach of the Code	

Originating Officer(s)	Mark Norman, Deputy Monitoring Officer
Wards affected	All

Summary

This report informs Council of proposals for revisions to the Authority’s Code of Conduct for Members and revisions to the arrangements for dealing with alleged breach of the Code.

Recommendations:

Council is recommended to:

1. Approve and adopt the revised Code of Conduct for Members and the revised arrangements for dealing with alleged breach of the Code as set out in Annex B to this report.

1. REASONS FOR THE DECISIONS

- 1.1 The proposed revisions are designed to make the Code of Conduct more robust and streamline arrangements for handling complaints of alleged breach of the Code. This will assist in promoting and maintaining high standards of conduct and improving confidence in local democracy.

2. ALTERNATIVE OPTIONS

- 2.1 The Council could decide to retain the existing Code of Conduct for Members and complaint handling arrangements contained in Annex A.

3. BACKGROUND

- 3.1 The Council is operating executive arrangements and pursuant to section 37 of the Local Government Act 2000 it must have a Constitution and also ensure that the Constitution is kept up to date. The Monitoring Officer reviews and monitors the operation of the Constitution and may make recommendations for improvements as appropriate pursuant to Article 15.01 of the Council's Constitution,. Non material changes to the Constitution may be approved by the General Purposes Committee on the recommendation of the Monitoring Officer. Substantive proposals for change must be approved by full Council.
- 3.2 The Code of Conduct for Members is an important Constitutional document which forms part of the Council's ethical framework and is adopted under the provisions of the Localism Act 2011. The 2011 Act requires full Council to approve and adopt the Code and arrangements for dealing with complaints of alleged breach of the Code.
- 3.3 Annex A to this report contains the existing Code of Conduct for Members and the existing arrangements for dealing with complaints of alleged breach of the Code.
- 3.4 Annex B to this report contains the proposed revised Code and proposed revised arrangements for dealing with complaints of alleged breach of the Code.
- 3.5 The proposed revisions were referred to political group leaders and have been considered by the cross party Governance Review Working Group and the Standards (Advisory) Committee.
- 3.6 In summary the proposed revisions to the Code include:
- Changes to the general principles of conduct to bring them up to date in terms of legislative context and current terminology.
 - Greater clarity of the requirements to register and declare statutory disclosable pecuniary interests and other interests.
- 3.7 A potential increase in the current value of £25 contained in the Code for requiring the registration of gifts and/or hospitality was also considered. However, the Standards (Advisory) Committee has recommended that on balance and for better transparency the £25 threshold should remain unchanged.
- 3.8 In summary, the revisions to the arrangements for dealing with complaints of breach of the Code are proposed to streamline the complaint handling process and include:
- Providing greater autonomy for the Monitoring Officer to reject complaints at the initial stage (whilst retaining the ability to seek a view from the

Investigation and Disciplinary Sub-Committee of the Standards (Advisory) Committee in more complex cases).

- Creating defined criteria on which the Monitoring Officer may reject complaints.
- Introducing a requirement for the Monitoring Officer to provide reasons for any rejection at the initial stage to the complainant (and include this in quarterly monitoring information provided to the Standards (Advisory) Committee).
- Introducing greater flexibility to seek local resolution of complaints at all stages of the process.
- Reducing the role of full Council to determine hearings and impose sanctions; it is proposed that the Hearings Sub-Committee of the Standards (Advisory) Committee is decision making as to whether a breach of the Code has occurred, but with a requirement for full Council or the Mayor (as appropriate) to agree more serious sanctions such as removal of a Member from a Council Committee or the Executive.
- Abolishing the Hearings (Appeals) Sub-Committee.
- An increase in the time allowed to the Monitoring Officer to extend investigations for more complex cases, making the total investigation period a maximum of 4 months instead of the current 3 months.

4. COMMENTS OF THE CHIEF FINANCIAL OFFICER

- 4.1 There are no immediate financial implications arising out of this report.

5. LEGAL SERVICES COMMENTS

- 5.1 This report has been prepared by the Deputy Monitoring Officer and incorporates legal comments.

6. RISK MANAGEMENT IMPLICATIONS

- 6.1 As outlined above the proposed revisions are designed to make the Code of Conduct more robust and streamline arrangements for handling complaints of alleged breach of the Code. This will assist in promoting and maintaining high standards of conduct and improving confidence in local democracy.

7. ONE TOWER HAMLETS CONSIDERATIONS

- 7.1 There are no specific anti poverty or equal opportunity implications arising out of this report.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 This report has no immediate implications for the Council's policy of sustainable action for a greener environment.

9. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 9.1 There are no specific crime and disorder reduction implications arising out of this report.

10. EFFICIENCY STATEMENT

- 10.1 This report is not concerned with proposed expenditure, the use of resources or reviewing/changing service delivery and an efficiency statement is not therefore required.

Linked Reports, Appendices and Background Documents

Linked Report

Report to the Standards Advisory Committee 22 September 2016 – Revised Code of Conduct for Members and Revised Arrangements for Dealing with alleged Breach of the Code.

Appendices

- Annex A - Code of Conduct for Members and the existing arrangements for dealing with complaints
- Annex B - Proposed revised Code and proposed revised arrangements for dealing with complaints of alleged breach of the Code.

Local Government Act, 1972 Section 100D (as amended)

List of “Background Papers” used in the preparation of this report

List any background documents not already in the public domain including officer contact information.

- Code of Conduct Revisions file

Officer contact details for documents:

- Mark Norman 020 7364 4800

Part 5 - Codes and Protocols

5.1 Code of Conduct for Members

Effective 1st July 2012. Adopted by the Council on 18th June 2012.

CONTENTS

Section	Subject
1	Introduction
2	Scope and Interpretation
3	General Obligations
4	Interests
5	Disclosable Pecuniary Interests
6	Interests arising in relation to Overview and Scrutiny Committees
7	Effect of Disclosable Pecuniary Interest on Participation at Meetings
8	The Register of Members' Interests
9	Sensitive Information

1. INTRODUCTION

1.1 Tower Hamlets Council has adopted this Code of Conduct for Members in accordance with the Localism Act 2011. The Code will assist the authority in providing excellent local government for the people of the borough. This Code of Conduct applies to the Mayor and all Members and Co-opted Members of the authority or any of its committees or sub-committees and it is your responsibility to comply with the provisions of this Code.

1.2 Tower Hamlets' Code of Conduct

- (a) Any alleged breach of the provisions of the Code of Conduct by a Member or co-opted Member of the authority shall be dealt with in accordance with the arrangements set out in Appendix A to this Code.

1.3 Additional Codes and Protocols

- (a) The Council has approved the following additional Codes and Protocols:
- Planning Code of Conduct
 - Licensing Code of Conduct
 - Member/Officer Protocol
 - Employees' Code of Conduct

This Code should be read in conjunction with these Codes and Protocols that have been adopted by the Council as supplementary guidance for Members

and officers. These Codes and Protocols do not form part of the Code of Conduct but Members and officers are required to comply with their provisions.

- (b) Any failure by the Mayor, a Member or co-opted member to comply with these additional Codes and Protocols may be investigated in accordance with the arrangements set out at Appendix A to this Code
- (c) Any failure by an officer to comply with these additional Codes and Protocols will be referred to the relevant Corporate Director and where appropriate disciplinary action may be taken.

1.4 General Principles of Conduct

You should read this Code together with the general principles prescribed by the Localism Act 2011. These principles are listed below and they should guide all aspects of your conduct as a member of the authority:-

- (a) selflessness;
- (b) integrity;
- (c) objectivity;
- (d) accountability;
- (e) openness
- (f) honesty; and
- (g) leadership.

1.5 Further Guidance

If you require further guidance on the application or interpretation of the provisions of this Code of Conduct or any of the additional Codes and Protocols approved by the Council you should contact the Monitoring Officer.

2. SCOPE AND INTERPRETATION

2.1 In this Code 'meeting' means any meeting of:

- (a) the authority;
- (b) the executive of the authority (currently known as the cabinet);
- (c) any of the authority's or its cabinet's committees, sub-committees, joint committees, joint sub-committees, panels, or area committees

2.2 In this Code 'Member' includes the Mayor, a co-opted Member and an appointed Member.

2.3 Subject to paragraph 2.4, you must comply with this Code whenever you:

- (a) conduct the business of the authority (which, in this Code, includes the business of the office to which you are elected or appointed); or

- (b) act, claim to act or give the impression you are acting as a representative of the authority;

and references to your official capacity are construed accordingly.

2.4 Where you act as a representative of the authority:

- (a) on another relevant authority (as defined by section 49(6) of the Local Government Act 2000), you must, when acting for that other authority, comply with any code of conduct adopted by that other authority;
- (b) on any other body, you must, when acting for that other body, comply with this Code of Conduct, except and insofar as it conflicts with any other lawful obligations to which that other body may be subject.

3. GENERAL OBLIGATIONS

3.1 You must treat others with respect.

3.2 You must not:

- (a) do anything which may cause the authority to breach the Equality Act 2010 or any other equality enactment;
- (b) bully any person;
- (c) intimidate or attempt to intimidate any person, including anyone who is or is likely to be:
 - (i) a complainant,
 - (ii) a witness, or
 - (iii) involved in the administration of any investigation or proceedings,in relation to an allegation that a Member (including yourself) has failed to comply with his or her authority's code of conduct;
- (d) act in a threatening manner towards any person;
- (e) do anything which compromises or is likely to compromise the impartiality of those who work for, or on behalf of, the authority.

3.3. You must not:

- (a) prevent another person from gaining access to information to which that person is entitled by law.
- (b) disclose information given to you in confidence by anyone, or information acquired by you which you believe, or ought reasonably to be aware, is of a confidential nature, including information that is exempt from publication in

accordance with Part 1 of Schedule 12A of the Local Government Act 1972 ('Part 2' agenda items), **except** where:

- (i) you have the consent of a person authorised to give it; or
- (ii) you are required by law to do so; or
- (iii) the disclosure is made to a third party for the purpose of obtaining professional advice provided that the third party agrees not to disclose the information to any other person; or
- (iv) the disclosure is reasonable **and** in the public interest **and** made in good faith **and** in compliance with the reasonable requirements of the authority.

3.4 You must not conduct yourself in a manner which could reasonably be regarded as bringing your office or the authority into disrepute.

3.5 You:

- (a) must not use or attempt to use your position as a Member improperly to confer on or secure for yourself or any other person, an advantage or disadvantage;
- (b) must, when using or authorising the use by others of the resources of the authority:
 - (i) act in accordance with the authority's reasonable requirements;
 - (ii) ensure that such resources are not used improperly for political purposes (including party political purposes);
- (c) must have regard to any applicable Local Authority Code of Publicity made under the Local Government Act 1986.

3.6 When reaching decisions on any matter you must have regard to any relevant advice provided to you by:

- (a) the authority's Chief Finance Officer; and/or
- (b) the authority's Monitoring Officer,

where they are acting pursuant to their statutory duties.

3.7 You must give reasons for all decisions in accordance with any statutory requirements and any reasonable additional requirements imposed by the authority.

4. INTERESTS

4.1 You have an interest in any business of the authority where either:

- (a) it relates to or is likely to affect:
 - (i) any body of which you are a member or in a position of general control or management and to which you are appointed or nominated by the authority;

(ii) any body

(aa) exercising functions of a public nature;

(bb) directed to charitable purposes; or

(cc) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union),

of which you are a member or in a position of general control or management;

(iii) any employment or business carried on by you;

(iv) any person or body who employs or has appointed you;

(v) any person or body, other than a relevant authority, who has made a payment to you in respect of your election or any expenses incurred by you in carrying out your duties;

(vi) any person or body who has a place of business or land in the authority's area, and in whom you have a beneficial interest in a class of securities of that person or body that exceeds the nominal value of £25,000 or one hundredth of the total issued share capital (whichever is the lower);

(vii) any contract for goods, services or works made between the authority and you or a firm in which you are a partner, a company of which you are a remunerated director, or a person or body of the description specified in paragraph (vi);

(viii) the interests of any person from whom you have received a gift or hospitality with an estimated value of at least £25;

(ix) any land in the authority's area in which you have a beneficial interest;

(x) any land where the landlord is the authority and you are, or a firm in which you are a partner, a company of which you are a remunerated director, or a person or body of the description specified in paragraph (vi) is, the tenant;

(xi) any land in the authority's area for which you have a licence (alone or jointly with others) to occupy for 28 days or longer; or

- (b) a decision in relation to that business might reasonably be regarded as affecting your well-being or financial position or the well-being or financial position of a relevant person to a greater extent than the majority of other council tax payers, ratepayers or inhabitants of the electoral division or ward, as the case may be, affected by the decision.

4.2 In paragraph 4.1(b), a relevant person is:

- (a) a member of your family or any person with whom you have a close association; or
- (b) any person or body who employs or has appointed such persons, any firm in which they are a partner, or any company of which they are directors;
- (c) any person or body in whom such persons have a beneficial interest in a class of securities exceeding the nominal value of £25,000; or
- (d) any body of a type described in paragraph 4.1 (a) (i) or (ii).

5. DISCLOSABLE PECUNIARY INTERESTS

5.1 A Disclosable Pecuniary Interest (DPI) is defined in law as a pecuniary interest of any of the following descriptions:-

Subject	Prescribed description
Employment, office, trade, profession or vacation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by M in carrying out duties as a member, or towards the election expenses of M. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority— (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.
Land	Any beneficial interest in land which is within the area of the relevant authority.
Licences	Any licence (alone or jointly with

others) to occupy land in the area of the relevant authority for a month or longer.

Corporate tenancies

Any tenancy where (to M's knowledge)—
(a) the landlord is the relevant authority; and
(b) the tenant is a body in which the relevant person has a beneficial interest.

Securities

Any beneficial interest in securities of a body where—
(a) that body (to M's knowledge) has a place of business or land in the area of the relevant authority; and
(b) either—

(i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or

(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

NB: A Member's DPs include his/her own relevant interests and also those of his/her spouse or civil partner; or a person with whom the Member is living as husband and wife; or a person with whom the Member is living as if they were civil partners; if the Member is aware that that other person has the interest.

5.2 Subject to paragraphs 5.3 to 5.6, where you have a Disclosable Pecuniary Interest in any business of the authority which is not included in the Member's register of interests and you attend, in any capacity, a meeting of the authority at which the business is considered, you must disclose to that meeting the existence and nature of that interest at the commencement of that consideration, or when the interest becomes apparent; and must within 28 days notify the Monitoring Officer of the interest for inclusion in the register.

5.3 Paragraph 5.2 only applies where you are aware or ought reasonably to be aware of the existence of the interest.

- 5.4** Where you have an interest but, by virtue of section 9, sensitive information relating to it is not registered in the authority's register of members' interests, you must indicate to the meeting that you have a personal interest, but need not disclose the sensitive information to the meeting.
- 5.5** Subject to paragraph 7.1 (b), where you have an interest in any business of the authority and you have made an executive decision in relation to that business, you must ensure that any written statement of that decision records the existence and nature of that interest.
- 5.6** In this Code 'executive decision' is to be construed in accordance with any regulations made by the Secretary of State under section 22 of the Local Government Act 2000.

6. INTERESTS ARISING IN RELATION TO OVERVIEW AND SCRUTINY COMMITTEES

- 6.1** You have an interest in any business before an overview and scrutiny committee of the authority (or of a sub-committee of such a committee) where:
- (a) that business relates to a decision made (whether implemented or not) or action taken by the Mayor or the authority's cabinet or another of the authority's committees, sub-committees, joint committees or joint sub-committees : and
 - (b) at the time the decision was made or action was taken, you were the Mayor or a member of the cabinet, committee, sub-committee, joint committee or joint sub-committee mentioned in paragraph (a) and you were present when that decision was made or action was taken.

7. EFFECT OF DISCLOSABLE PECUNIARY INTERESTS ON PARTICIPATION AT MEETINGS

- 7.1** Subject to paragraph 7.2 where you have a DPI in any business of the authority:
- (a) you must withdraw from the room or chamber where a meeting considering the business is being held, including from any public viewing area:
 - (i) in a case where paragraph 7.2 applies, immediately after making representations, answering questions or giving evidence;
 - (ii) in any other case, whenever it becomes apparent that the business is being considered at that meeting;unless you have obtained a dispensation from the authority's Monitoring Officer following consideration by the Dispensations Sub-Committee of the Standards Advisory Committee;
 - (b) you must not exercise executive functions in relation to that business; and

(c) you must not seek improperly to influence a decision about that business.

7.2 Where you have a Disclosable Pecuniary Interest in any business of the authority, or in relation to business before an Overview and Scrutiny Committee of the kind described at section 6 above, you may attend a meeting (including a meeting of the Overview and Scrutiny Committee or of a sub-committee of such a committee) but only for the purpose of making representations, answering questions or giving evidence relating to the business, provided that the public are also allowed to attend the meeting for the same purpose, whether under a statutory right or otherwise.

8. THE REGISTER OF MEMBERS' INTERESTS

8.1 Subject to paragraph 9, you must, within 28 days of:

- (a) this Code being adopted by the authority; or
- (b) your election or appointment to office (where that is later); or
- (c) Disclosing a DPI at a meeting of the authority, its executive or any committee or sub-committee;

Notify the Monitoring Officer in writing, for inclusion in the authority's Register of Members' Interests, of details of your Disclosable Pecuniary Interests and other interests that fall within any of the categories mentioned in paragraph 4.1 (a).

8.2 Subject to paragraph 9, you must, within 28 days of becoming aware of any new DPI or change to any interest registered under paragraph 8.1, register details of that new interest or change by providing written notification to the authority's Monitoring Officer.

9. SENSITIVE INFORMATION

9.1 Where you consider that the information relating to any of your interests is sensitive information, and the authority's Monitoring Officer agrees, you need not include that information when registering that interest, or, as the case may be, a change to that interest under paragraph 8.

9.2 You must, within 28 days of becoming aware of any change of circumstances which means that information excluded under paragraph 9.1 is no longer sensitive information, notify the authority's Monitoring Officer asking that the information be included in the authority's Register of Members' Interests.

9.3 In this Code, 'sensitive information' means information whose availability for inspection by the public creates, or is likely to create, a serious risk that you or a person who lives with you may be subjected to violence or intimidation.

LONDON BOROUGH OF TOWER HAMLETS

ARRANGEMENTS FOR DEALING WITH COMPLAINTS OF BREACH OF THE CODE OF CONDUCT FOR MEMBERS

Effective 1st July 2012. Arrangements agreed by the Council on 18th June 2012 and subsequently revised by the Council on 18th September 2013.

1. The Monitoring Officer shall be the Proper Officer to receive complaints of any failure by the Mayor, a Councillor or a co-opted member to comply with the Code of Conduct for Members. On receipt of a complaint the Monitoring Officer shall within three working days inform the subject member of the substance of the complaint on a confidential basis.
2. The Monitoring Officer shall ensure that the Council appoints at least one Independent Person and at least one reserve Independent Person.
3. Complainants must provide their name and postal address when submitting a complaint. Anonymous complaints will not be considered unless in exceptional circumstances where the Monitoring Officer decides (after consultation with the Independent Person) that the complaint raises a serious issue affecting the public interest which is capable of investigation without the need to ascertain the complainant's identity.
4. The Monitoring Officer shall, after consultation with the Independent Person and within ten working days of receiving the complaint (so far as practicable), determine whether a complaint merits formal investigation and arrange for such investigation. In making this determination the Monitoring Officer may at his/her discretion also consult other persons including Counsel.
5. In determining whether to refer a complaint for investigation, the Monitoring Officer may take into account how long has elapsed since the event(s) complained about took place and if this is more than one year, then a complaint will be rejected as out of time unless the complainant demonstrates that there are good reasons for the delay such as fresh evidence not available at the earlier date or only recently discovered.
6. The Monitoring Officer may refer a complaint of failure to comply with the Code to the Standards Advisory Committee or its sub-committee to recommend whether or not the complaint requires investigation where s/he feel that it is inappropriate for him/her to take the decision without seeking their advice. Where the Monitoring Officer considers that a complaint should not be subject to investigation, s/he shall convene an Investigation and Disciplinary Sub-Committee of the Standards Advisory Committee which shall make the final decision on the matter.
7. The Monitoring Officer will report quarterly (or less frequently if there are no complaints to report) to the Standards Advisory Committee on the number and

nature of complaints received and action taken as a result. This will include details of complaints that did not require investigation so that the Committee can exercise its oversight role.

8. If a complaint of failure to comply with the Code is referred for investigation the Monitoring Officer shall appoint an investigator or complete the investigation him/herself. Such investigation should be completed within two months of the decision to refer the matter for investigation. The Monitoring Officer may extend this period by up to a further month where s/he feels it is necessary to ensure an adequate investigation.
- 8A. In cases where the Monitoring Officer exercises their power to extend the time period of investigations into complaints from two months to three months, a report on the reasons for this is presented to the Standards Advisory Committee for noting and a letter is to be sent to the complainant(s) and subject(s) of the investigation notifying them of the extension and the reasons for this. The Monitoring Officer will also at each meeting of the Standards Advisory Committee present a report listing all complaints which have exceeded the two month referral for investigation with details of the length of time elapsed and the reasons for the delay. This report will include all complaints which have exceeded the two month investigation period since the last meeting of the Advisory Committee as well as those complaints previously reported to the Advisory Committee which remain outstanding in excess of the two month investigation period.
9. The Monitoring Officer or his/her deputy may, either before a complaint is referred for investigation or during the course of the investigation, seek local resolution of the matter to the satisfaction of the complainant before the investigation is concluded. Where the Monitoring Officer or deputy attempts to reach a local resolution before a complaint is referred for investigation, such attempts shall be subject to a four week time limit.
10. Where any investigation into a complaint of breach of the Code finds no evidence of failure to comply with the Code of Conduct, the Monitoring Officer shall within four weeks of receipt of the investigation report, consult with the Independent Person and the Standards Advisory Committee Investigations and Disciplinary Sub-Committee to confirm their agreement that the matter shall be closed without further hearing. If the Sub-Committee agree then the matter is closed. The Monitoring Officer shall provide a copy of the report and findings of the investigation which shall be kept confidential to the complainant and to the member concerned and shall report the matter as part of the quarterly report to the Standards Advisory Committee for information.
11. Where the investigation finds evidence of a failure to comply with the Code of conduct, the Monitoring Officer in consultation with the Independent Person, may seek local resolution to the satisfaction of the complainant in appropriate cases, with a summary report for information to Standards Advisory Committee in due course. Where such local resolution is not appropriate or not possible the Monitoring Officer shall report the investigation findings to a Hearings Sub-Committee of the Standards Advisory Committee for local hearing and recommendations. The Hearings Sub-Committee will be convened within one month of the Monitoring Officer receiving the

investigation report. The Hearings Sub-Committee may sit in private after advice from the Monitoring Officer.

12. The Hearings Sub-Committee will advise the Monitoring Officer whether or not they consider there has been a breach of the Code and if they consider sanction is appropriate having heard the matter shall request that the Monitoring Officer prepare a report to Full Council setting out the details of the investigation, hearing and proposed sanction which may include any of the following:-
 - Recommend to the member's Group Leader (or in the case of ungrouped members, recommend to Council or to Committees) that he/she be removed from any or all Committees or Sub-Committees of the Council;
 - Recommend to the Mayor that the member be removed from the Executive, or removed from particular Portfolio responsibilities;
 - Recommend the Monitoring Officer to arrange training for the member (subject to the Members agreement);
 - Recommend remove as from all outside appointments to which the Member has been appointed or nominated;
 - Recommend withdrawing facilities provided to the member by the Council, such as a computer, website and/or email and Internet access; or
 - Recommend excluding the member from the Council's offices or other premises, with the exception of meeting rooms as necessary for attending Council, Executive Committee and Sub-Committee meetings (as appropriate);
 - Recommend the member to contact the Council via specified point(s) of contact;
 - Write to the member with their advice on the Members conduct.
13. In determining any recommended sanction the Sub-Committee may take into account any previous breach by the member concerned and/or their compliance with any previous sanction applied.
14. Where a subject member feels that a recommended sanction would cause him/her undue hardship or prevent him/her from undertaking ward duties, that Member may make representations to the Council meeting that will consider the recommendations of the Hearings Sub-Committee on the relevant complaint. Any such representations shall be notified to the Monitoring Officer within five working days of the Hearing Sub-Committee meeting.
15. The recommendations of the Hearings Sub-Committee shall be published in a local newspaper in the Public Notices Section and on the Council's website as well as in the minutes of the meeting. The content of any notice to be published shall be subject to agreement by the Chair of the Hearings Sub-Committee. Following publication, a link to the notice shall remain on the front page of the Council's website for a period of one month or such other position and/or period as the Hearings Sub-Committee may recommend. The Monitoring Officer shall draft further guidance on the detailed procedures for publication of decisions as necessary.
16. A member who is the subject of a finding by the Standards Advisory Committee that he/she has breached the code may appeal against that finding and/or against any

sanction applied. A complainant who is dissatisfied with the outcome of his/her complaint may appeal against that outcome. Any appeal under this section shall be notified in writing to the Monitoring Officer within 15 working days of the Hearings Sub-Committee recommendation being notified to the member or complainant and the Monitoring Officer shall arrange for the appeal to be heard by a Hearings (Appeal) Sub-Committee of the Standards Advisory Committee within 15 working days of receipt of the appeal. The decision of the Hearings Sub-Committee shall not be published, nor any sanctions applied, until the period allowed for an appeal has expired.

17. An appeal under 15 above may be made on grounds of either fact or defective procedure. The appellant must state the grounds on which the appeal is made and must provide specific reasons and any further information to support his/her appeal.
18. The Sub-Committee to hear any appeal under 15 above shall not include any member of the Hearings Sub-Committee that considered the investigation of the matter in question.
19. A member who is the subject of a complaint shall be informed of, and shall have the right to attend and/or be represented at, the hearing of the Standards Advisory Committee or any of its sub-committees that considers any matter relating to that complaint following investigation.
20. The timelines set out in this procedure are for guidance only and shall be observed where practicable but may be extended by the Monitoring Officer as necessary if they cannot be complied with by any relevant party due to sickness, holidays or other reasonable cause.

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TOWER HAMLETS LBC
Revised Code of Conduct for Members
DRAFT

1. Introduction

1.1 This Code sets out the principles and standards of conduct for all elected and co-opted members of the London Borough of Tower Hamlets.

1.2 The Council is committed to the highest standards of ethical behaviour. The law prescribes minimum requirements of conduct which are included in this Code. The Code also contains additional requirements which the Council has chosen to adopt using its own local discretion.

1.3 Any reference to 'members' in this Code, or any appendices or related protocols, means the Mayor, elected and co-opted members. This Code applies at all times when members act in their capacity as member (or claim to act or give the impression of acting in their capacity as a member).

2. General Principles of Conduct

2.1 Members are required to comply with the following principles in their capacity as a member:-

SELFLESSNESS
INTEGRITY
OBJECTIVITY
ACCOUNTABILITY
OPENNESS
HONESTY
LEADERSHIP

2.2 Members must act solely in the public interest. They should not improperly confer (or seek to confer) an advantage or disadvantage on any person. They should not act to gain financial or other benefit for themselves, their family, friends or close associates.

2.3 Members should not place themselves under a financial or other obligation to any individual or organisation that might seek to influence the performance of their duties as a member.

2.4 Members should make decisions on merit, including when awarding contracts, making appointments, or recommending individuals for rewards or benefits.

2.5 Members are accountable to the public for their actions and the manner in which they carry out their responsibilities and should co-operate fully and honestly with any scrutiny appropriate to their office.

2.6 Members should be as open as possible about their decisions and actions and those of the Council. They should be prepared to give reasons for decisions and have regard to the advice of the Council's statutory officers before making any decision.

2.7 Members should act to ensure Council resources are used prudently. When using or authorising the use by others of Council resources, members must ensure that they are used only for legitimate Council purposes and not for any other purpose. In particular they must not be used improperly for political purposes (including party political purposes).

2.8 Members should take account of the views of others, including their political groups, but must reach their own conclusions and act in accordance with those conclusions.

2.9 Members should promote equality and not discriminate unlawfully against any person. Members should treat all people with respect, they should not bully any person and should respect the impartiality and integrity of the Council's officers.

2.10 Members should promote and support high standards of conduct by leadership and example.

3. Members' Interests

3.1 For the purposes of this Code there are two categories of interest that require registration with the Monitoring Officer:

Disclosable pecuniary interest
Other interests the Council has decided should be registered

3.2 **A disclosable pecuniary interest** is defined by statutory regulation. Members must within 28 days of taking office as a member, notify the Monitoring Officer of any disclosable pecuniary interest to be included in the Register of Members' Interests. **Failure to declare or register a disclosable pecuniary interest is a criminal offence.**

3.3 A disclosable pecuniary interest also includes the interests of a members' partner. A partner is your spouse or civil partner, a person with whom you are living as husband or wife, or a person with whom you are living as if you are civil partners. A member and their partner is referred to in the statutory definition of a disclosable pecuniary interest as 'relevant person'.

3.4 The categories of disclosable pecuniary interest are:

Employment, office, trade, profession or vocation

Any employment, office, trade, profession or vocation carried on by a

relevant person for profit or gain.

Sponsorship

Any payment or provision of any other financial benefit (other than from the Council) made or provided within the 12 months prior to the date of giving notice of interest for inclusion in the register in respect of any expenses incurred by the member in carrying out duties as a member, or towards the election expenses of the member.

This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.

Contracts

Any contract which is made between a relevant person (or a firm in which they are a partner, or a body corporate in which they are a director or in the securities of which body corporate they have a beneficial interest) and the relevant authority:-

under which goods or services are to be provided or works are to be executed; and
which has not been fully discharged.

Land

Any beneficial interest in land which is within the borough.

Licences

Any licence (alone or jointly with others) to occupy land in the borough for a month or longer.

Corporate tenancies

Any tenancy where (to the member's knowledge):-

the landlord is the Council; and

the tenant is a body in which the relevant person is a firm in which they are a partner, or a body corporate in which they are a director or in the securities of which body corporate they have a beneficial interest.

Securities

Any beneficial interest in securities of a body where:-

that body (to the member's knowledge) has a place of business or land in the borough; and

either:-

the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or

if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

3.5 Other interests the Council has decided should be registered.

Members must also within 28 days of taking office as a member, notify the Monitoring Officer of such other interests that the Council has decided should be included in the register of Members' Interests. These are:

3.6 Any person from whom you have received a gift or hospitality with an estimated value of at least £25.

3.7 Membership or position of control or management in:-

Any body to which you have been appointed or nominated by the Council; and/or

Any body exercising functions of a public nature (described below) or directed to charitable purposes, or whose principal purposes include the influence of public opinion or policy, including any political party

3.8 There is no definitive list of bodies exercising functions of a public nature, but those bodies which:-

carry out a public service, or
take the place of local/central government (including through outsourcing); or
carry out a function under legislation or in pursuit of a statutory power; or
can be judicially reviewed,

are likely to be bodies carrying out functions of a public nature. They include bodies such as government agencies, other councils, health bodies, council owned companies and school governing bodies.

3.9 All members must ensure that their entries in the Register of Members' Interests are kept up to date they must notify the Monitoring Officer of any change to their interests within 28 days of the change arising.

4. Declaration of interests

4.1 Members with a disclosable pecuniary interest may not participate in any discussion of, vote on, or discharge any function relating to any matter in which the member has such an interest, unless a dispensation has been granted under Section 33 Localism Act 2011.

4.2 The law requires that if a member has a disclosable pecuniary interest which is not entered on the Register of Members' Interests, then the member must disclose the interest to any meeting of the Council at which they are present where they have a disclosable pecuniary interest in any matter being considered at that meeting. However this shall not apply if the interest is a 'sensitive interest' (see para 4.3 below.) Following any such disclosure the law requires that members update their entry in the Register of Members' Interests within 28 days of the date of disclosure. In this context the law defines a meeting as a meeting of the Council, or any committee, sub-committee or joint committee of it.

4.3 A 'sensitive interest' is an interest the disclosure of which the member and Monitoring Officer have agreed could lead to the member or a person connected with them being subject to violence or intimidation

4.4 Where a member is present at a meeting and has registered an interest in any matter which is to be discussed at the meeting (which is not a disclosable pecuniary interest) they must declare the nature of the interest at the earliest opportunity and in any event before the matter is considered. The declaration will be recorded in the minutes of the meeting. The member may stay in the room and participate in consideration of the matter and vote on it subject to paragraph 4.5.

4.5 Where a member has an interest which under this Code would not be a disclosable pecuniary interest but requires registration (and therefore would not generally by law prevent participation in consideration of a matter in which the member has that interest) the member must also consider whether a reasonable member of the public in possession of all the facts would think that their interest is so significant that it would be likely to impair the member's judgement of the public interest. If so, the member must withdraw and take no part in consideration of the matter nor seek to influence the outcome improperly.

5. Interests not included in the Register of Members' Interests

5.1 Occasions may arise where a matter under consideration would, or would be likely to, affect the wellbeing of the member, their family, friend or close associate(s) more than it would affect those in the local area generally, but which is not required to be included in the Register of Members' Interests (for example, a decision in relation to a school closure, where a member has a child at the school). In such matters, members must comply with paragraph 4 in its entirety as if the interest were a registerable one.

Note: The provisions of paragraphs 4 and 5 apply not only to meetings but to circumstances where a member makes a decision alone.

6. Access to Information

6.1 Members must not disclose confidential information given to them in the course of their duties without the consent of the person entitled to give it unless:-

there is a legal requirement to disclose the information, or
the disclosure is to a third person for the purpose of obtaining professional advice and the third party agrees not to disclose it, or
the disclosure is reasonable, in the public interest, made in good faith and made in accordance with the Council's reasonable requirements.

6.2 Conversely, members must not prevent access to information to which another is entitled by law.

7. Protocols

7.1 The Council has approved the following additional Codes and Protocols:

- Planning Code of Conduct
- Licensing Code of Conduct
- Member/Officer Protocol
- Employees' Code of Conduct

This Code should be read in conjunction with these Codes and Protocols.

8. Complaints

8.1 Any alleged breach by a member of the provisions of this Code or any of the Codes and Protocols listed in section 7 above will be dealt with in accordance with the arrangements set out in Appendix A to the Code.

8.2 Any failure by an officer to comply with the provisions of any of the Codes and Protocols listed in section 7 above will be referred to the relevant Corporate Director and may result in disciplinary action.

8.3 Members are reminded that breach of any of the statutory requirements relating to the registration and declaration of disclosable pecuniary interests may result in prosecution. Breach of the provisions introduced locally by the Council will be dealt with in accordance with Appendix A.

Members in need of advice about the application of this Code should contact the Monitoring Officer, Melanie Clay

Revised Code of Conduct for Members Appendix A

LONDON BOROUGH OF TOWER HAMLETS

REVISED ARRANGEMENTS FOR DEALING WITH COMPLAINTS OF BREACH OF THE CODE OF CONDUCT FOR MEMBERS

Arrangements agreed by the Council on 2016.

Introduction

The Council has adopted a Code of Conduct for Members which is available on the Council's website and on request from the Monitoring Officer.

In accordance with section 28 of the Localism Act 2011, these arrangements set out how an allegation may be made that the Mayor, an elected Member or a Co-opted Member of the London Borough of Tower Hamlets has failed to comply with the Council's Code of Conduct for Members and how the Council will deal with such allegations.

These arrangements also require that the Monitoring Officer shall ensure that the Council appoints at least one Independent Person and at least one reserve Independent Person for the purposes of meeting the statutory requirements of the Localism Act 2011.

Any reference in these arrangements to the Monitoring Officer shall include a deputy Monitoring Officer. The timelines set out are for guidance and shall be observed where practicable but may be extended by the Monitoring Officer as necessary if they cannot be complied with by any relevant party due to sickness, holidays or other reasonable cause.

Complaints

1. Allegations concerning possible breaches of the Code of Conduct for Members should be made in writing to the Monitoring Officer.
2. On receipt of a complaint the Monitoring Officer shall within five working days acknowledge receipt to the complainant. The Monitoring Officer will also within five working days and on a confidential basis, inform the subject Member of the substance of the complaint and the identity of the complainant (unless the Monitoring Officer considers that such notification would prejudice the proper consideration and investigation of the complaint).
3. Complainants must provide their name and postal address when submitting a complaint. Anonymous complaints will not be considered unless the Monitoring Officer decides (after consultation with the Independent Person) that the complaint raises a serious issue affecting the public interest which is capable of investigation without the need to ascertain the complainant's identity.
4. A complainant when making an allegation should specify the identity of the person(s) alleged to have breached the Code, the conduct that is alleged to give rise to the breach, the evidence that supports the allegation and the names (and contact details) for any potential witnesses able to give direct evidence of the events complained about.

Assessment of Complaints

5. The Monitoring Officer shall, after consultation with the Independent Person and within ten working days of receiving the complaint:

- (a) Decide whether or not a complaint merits formal investigation and where appropriate arrange for an investigation; OR
 - (b) Decide to attempt to facilitate informal resolution of the complaint (such attempt shall be subject to a four week time limit).
6. In making this determination the Monitoring Officer may at his/her discretion report the matter to the Investigation & Disciplinary Sub-Committee (IDSC) of the Standards (Advisory) Committee for consideration and/or consult other persons as appropriate.
7. The Monitoring Officer may decide not to refer the matter for investigation where:
- (a) The allegation does not demonstrate any potential breach of the Code (because for example it relates to dissatisfaction with a Council decision/service or relates to events which occurred when the person complained about was not acting in an official capacity).
 - (b) The event(s) complained about took place more than six months ago and there are no valid reasons for the delay in bringing the complaint, such as fresh evidence not available at the earlier date or only recently discovered.
 - (c) The allegation is about someone who is no longer the Mayor or a Member/Co-opted Member.
 - (d) The complainant has failed to provide the information specified in paragraph 4 above or any other information reasonably requested by the Monitoring Officer.
 - (e) The same or a similar allegation has been investigated and determined.
 - (f) The Mayor, Member or Co-opted Member has already accepted they made an error in their conduct and/or has apologised for their conduct and the Monitoring Officer considers the matter would not warrant a more serious sanction.
 - (g) The allegation is politically motivated and/or 'tit for tat'.
 - (h) The allegation is not considered sufficiently serious to merit the cost to the public of carrying out an investigation.
 - (i) The Monitoring Officer has facilitated an informal resolution of the complaint (see below) and the Mayor or Member/Co-opted Member complained about has offered to take remedial action that the Monitoring Officer considers appropriate in all the circumstances (for example by apologising to the complainant and/or undertaking training or issuing a statement of factual correction).
8. Where the Monitoring Officer decides to reject a complaint s/he shall inform the complainant in writing giving the reasons for rejection.

Investigation and Monitoring of Complaints

9. If a complaint of failure to comply with the Code is referred for investigation the Monitoring Officer shall appoint an investigator or complete the investigation him/herself. Such investigation should whenever possible be completed within two months of the decision to refer the matter for investigation. The Monitoring Officer may extend this period by up to a further two months where s/he feels it is necessary to ensure a proper and adequate investigation.
10. The Monitoring Officer will keep the complainant and the subject Member informed as to progress at appropriate intervals and shall inform them of any extension to the period for the investigation.


11. The Monitoring Officer will report quarterly (or less frequently if there are no complaints to report) to the Standards (Advisory) Committee on the number and nature of complaints received and action taken as a result. This will include details of complaints that have been rejected by the Monitoring Officer and any extension made to the period for an investigation of a complaint.
12. Where any investigation into a complaint of breach of the Code finds no evidence of failure to comply with the Code of Conduct, the Monitoring Officer shall within four weeks of receipt of the investigation report, consult with the Independent Person and decide whether the matter should be closed without reference to a Hearings Sub-Committee. The Monitoring Officer shall provide a copy of the report and findings of the investigation which shall be kept confidential to the complainant and to the Member concerned and shall report the matter as part of the quarterly report to the Standards (Advisory) Committee for information. The Monitoring Officer may also seek advice from the IDSC before deciding that a matter should be closed without reference to the Hearings Sub-Committee.
13. Where an investigation finds evidence of a failure to comply with the Code of Conduct, the Monitoring Officer following consultation with the Independent Person, may seek local resolution of the complaint. If local resolution succeeds the Monitoring Officer shall report the matter as part of the quarterly report to the Standards (Advisory) Committee. If local resolution does not succeed or if following consultation with the Independent Person, the Monitoring Officer considers that it is not appropriate to seek local resolution, the Monitoring Officer shall report the investigation findings to a Hearings Sub-Committee of the Standards (Advisory) Committee for local hearing and determination. The Hearings Sub-Committee will whenever practicable be convened within one month of the Monitoring Officer receiving the investigation report.

Hearings Sub-Committee

14. The Hearings Sub-Committee will consider the investigation report and any submissions from the subject Member and determine:
 - (a) If there has been a breach of the Code of Conduct having taken into account the views of the Independent Person; and if so
 - (b) Whether any sanction is appropriate having taken into account the views of the Independent Person.
15. Possible sanctions may include any of the following:-
 - (a) Publication of the Sub-Committee's decision.
 - (b) Reporting the Sub-Committee's decision to Council.
 - (c) Requesting the Monitoring Officer to arrange training for the Member (subject to the Member's agreement).
 - (d) Issuing a censure or reprimand which may also be reported to Council.
 - (e) Requiring the Member to contact the Council and officers via specified point(s) of contact.
 - (f) Withdrawing facilities provided to the Member by the Council, such as a computer or internet access.
 - (g) Excluding the Member from the Council's offices or other premises, with the exception of meeting rooms as necessary for attending Council, Executive, Committee and Sub-Committee meetings (as appropriate).
 - (h) Recommending to the Member's Group Leader that s/he be removed from any or all Committees or Sub-Committees of the Council.
 - (i) Recommending to the Mayor that the Member be removed from the Executive, or removed from particular portfolio responsibilities.

- (j) Recommending to Council or the Mayor as appropriate the removal from outside appointments to which the Member has been appointed or nominated.
- (k) Recommending to Council that the Member be removed from any or all Council Committees or Sub-Committees.

16. In determining any recommended sanction the Hearings Sub-Committee may take into account any previous breach by the Member concerned and/or their compliance with any previous sanction applied.

<p>Non-Executive Report of the:</p> <p>Council</p> <p>5th December 2016</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Graham White, Interim Service Head, Legal Services and Deputy Monitoring Officer</p>	<p>Classification: Unrestricted</p>
<p>Proposed Revised Licensing Code of Conduct</p>	

Originating Officer(s)	Paul Greeno, Senior Corporate and Governance Lawyer
Wards affected	All wards

Summary

This report advises of a proposed revised Licensing Code of Conduct at Part 5.3 of the Tower Hamlets Constitution.

Recommendations:

Council is recommended to:

1. Adopt the revised Licensing Code of Conduct.

1. REASONS FOR THE DECISIONS

- 1.1 Pursuant to the Local Government Act 2000 ('the 2000 Act') as the Council is operating Executive arrangements then it must have a Constitution and also ensure that this Constitution is kept up-to-date. Pursuant to Part 2 Article 15 of the Constitution it is a Monitoring Officer role to review the Constitution.
- 1.2 The Licensing Code of Conduct is an important Constitutional document as it is part of the Council's ethical framework and is in addition to the Councillors' Code of Conduct adopted under the provisions of the Localism Act 2011.
- 1.3 As the work of the Licensing Committee is quasi-judicial and therefore there are a higher set of standards on Councillors who are involved in the decision-making process. The provisions of the revised Licensing Code are designed to better assist Councillors when determining such applications.

2. ALTERNATIVE OPTIONS

- 2.1 The Council can decide not to adopt a revised Policy.

3. DETAILS OF REPORT

- 3.1 Pursuant to the Local Government Act 2000 ('the 2000 Act') as the Council is operating Executive arrangements then it must have a Constitution and also ensure that this Constitution is kept up-to-date. Pursuant to Part 2 Article 15 of the Constitution it is a Monitoring Officer role to review the Constitution.
- 3.2 The Licensing Code of Conduct is an important Constitutional document as it is part of the Council's ethical framework and is in addition to the Councillors' Code of Conduct adopted under the provisions of the Localism Act 2011.
- 3.3 Whilst most decisions taken by Councillors are administrative in nature, the work of the Licensing Committee is different in that its proceedings are quasi-judicial and the rules of natural justice apply. This imposes a new and higher set of standards on those Councillors who are involved in the decision-making process. The provisions of the revised Licensing Code are designed to ensure that licensing decisions are taken on proper licensing grounds; in a fair consistent and open manner; and that Councillors making such decisions are, and are perceived as being, accountable for those decisions.
- 3.4 The Code is also designed to assist Councillors in dealing with and recording approaches from applicants, licensees and objectors and is intended to ensure that the integrity of the decision-making process is preserved.
- 3.5 Appendix 1 contains the existing Code of Conduct for Licencing and Annex B contains the revised Code.

- 3.6 Reasons for suggesting changes to the current Code of Conduct fall into 4 categories:
- (i) Changes that bring the Code up to date in terms of legislative context, the organisational structure of the Council and/or current terminology;
 - (ii) Improvements to achieve better consistency with other documents in terms of content and style and structure;
 - (iii) The addition of information/explanation to aide understanding;
 - (iv) Material changes to the Code that will require members and/or officers to conduct themselves differently than under the existing Code
- 3.7 Changes relating to (i) and (ii) above have been made to all sections of the document and, as they are not material, have not been singled out.
- 3.8 Changes to sections relating to categories (iii) and (iv) above are identified in Table 1 for each code as it was felt that these changes in particular should be brought to Members' attention.
- 3.9 The revised Code has been referred to, the Head of Environmental Health and Trading Standards, and within whose area Licensing sits and he has confirmed that he has no issues with it. He raised a separate issue regarding Member training and it is intended that if the revised Code is introduced that it would be presented to Members of the Licensing Committee along with a briefing as to the revised Code.
- 3.10 The revised Code was also presented to the Governance Review Working Group and the following observations were made:
- (i) Members queried whether information could be given more succinctly and a bulleted point A4 sheet of dos and don'ts will be introduced along with any revised Code that is approved;
 - (ii) Members wanted more information about relationship with applicants and information relevant to this in paragraphs 5, 8, 9 and 10 of the revised Code; and
 - (iii) Members considered the addition on site visits was useful and advised of a site visit on a Licensing application last year and which was very useful in relation to the determination of the application.
- 3.11 The revised Code has gone to the Licensing Committee who made no observations but the Procedure Rules in Appendix A and Appendix B of the revised Code have been adopted by the Licensing Committee.
- 3.12 The revised Code has gone to the Standards Advisory Committee who made certain suggestions and changes were made as follows:

- In paragraph 2.3 the word “man” has been replaced with the word “people”. This was as a result of an observation that could a more gender neutral term be used.
- In paragraph 5.8 the words “at the start of the meeting and, in any event,” have been added. This was to reinforce that declarations of interests should be made at the start of meetings.
- Also in paragraph 5.8 the words “provided that the personal interest is not so significant that there is a real possibility of bias or predetermination and which is likely to prejudice the Councillor’s judgement of the public interest (see 5.9 below)” have been added at the end of that paragraph. This was as it was felt that they could be additional clarification.
- In paragraph 9.1 the words “does not sit well with the quasi-judicial nature of a Licensing Committee” have been deleted and the words “can cause the perception of bias or predetermination especially” inserted in their stead. Further the words “Being lobbied in advance is therefore incompatible with this high standard” have been deleted from the end of the paragraph. It was felt that part of a councillors’ role was to receive representations on matters of concern and that this role potentially conflicted with the Code. The following additional changes were also made to paragraph 9 as a result of this change as follows:
 - Paragraph 9.2 the word “Therefore” has been deleted and replaced with the words “To avoid such perception,”.
 - Paragraph 9.2(a) the word “objector” has been inserted and the word “only” deleted.
 - Paragraph 9.3 the word “in” has been deleted and replaced with the words “If the Councillor does discuss the case then in”.
 - Paragraph 9.3 the words “As stated in 9.2(c) above, the Councillor must keep an adequate written record of the discussion so as to enable the Member to disclose the fact and nature of such an approach at any relevant meeting of the Licensing Committee” inserted at the end of the paragraph.
 - Paragraph 9.5 the words “As stated in 9.2(c) above, the Councillor must keep an adequate written record of the discussion so as to enable the Member to disclose the fact and nature of such an approach at any relevant meeting of the Licensing Committee” inserted at the end of the paragraph.

3.13 For information, Members are also advised that, in addition to this Code, all the Codes/ Protocols in Part 5 of the Constitution are being reviewed.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

4.1 There are no financial implications arising from this report, although the revision to the Code of Conduct should reduce the likelihood of successful appeals against decisions made by the Committee and the associated cost of those appeals.

5. LEGAL COMMENTS

- 5.1 Any legal implications are addressed in the body of the report.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 The provisions of the revised Licensing Code are designed to ensure that licensing decisions are taken on proper licensing grounds; in a fair consistent and open manner; and that Councillors making such decisions are, and are perceived as being, accountable for those decisions. The Code is also designed to assist Councillors in dealing with and recording approaches from applicants, licensees and objectors and is intended to ensure that the integrity of the decision-making process is preserved. In implementing the Code, Councillors will ensure that decisions are taken for Licensing reasons only and should help to achieve the objectives of equality and personal responsibility inherent in One Tower Hamlets.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 The report does not propose any direct expenditure. Rather, it is concerned with ensuring that licensing decisions are taken on proper licensing grounds; in a fair consistent and open manner; and that Councillors making such decisions are, and are perceived as being, accountable for those decisions. Whilst this might not lead to fewer appeals, the implementation of the Code should result in a much decreased chance of success on such appeals and which should reduce cost implications for the Council on any such appeals.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 The provisions of the revised Licensing Code are designed to ensure that licensing decisions are taken on proper licensing grounds; in a fair consistent and open manner; and that Councillors making such decisions are, and are perceived as being, accountable for those decisions. It is not considered that there are any environmental implications if this revised Code is ultimately adopted.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 This proposed revision of the Licensing Code of Conduct is designed to ensure that licensing decisions are taken on proper licensing grounds; in a fair consistent and open manner; and that Councillors making such decisions are, and are perceived as being, accountable for those decisions. The overall aim is therefore to reduce risk.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 In considering Licensing applications, the Council has to have regard to Crime and Disorder and by ensuring that licensing decisions are taken on proper licensing grounds this should reduce assist reduce crime and disorder.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE

Appendices

- Table 1 - Changed sections and reason for change
- Appendix 1 - Current Licensing Code of Conduct
- Appendix 2 – Proposed Revised Licensing Code of Conduct.

Local Government Act, 1972 Section 100D (As amended)

List of “Background Papers” used in the preparation of this report

List any background documents not already in the public domain including officer contact information.

- NONE

Officer contact details for documents:

- N/A

Table 1: Changed sections and reason for change

	Changes to improve quality/clarity of information or explanation		Additional/ Material changes to the Code affecting members and / or officers	
	Current Version Annex 1	Proposed New Version Annex 2	Current Version Annex 1	Proposed New Version Annex 2
Licencing Code	1. Introduction 2. Legal Background 3. Before the hearing 3.1 Training for Councillors 3.2 Application by a councillor or officer 3.3 Lobbying 3.5 Discussions before the hearing 4. At the Hearing 4.2 Conduct at the Hearing 5. Councillors who are not on the committee 6. Record Keeping	1. Introduction 2. Human rights Act 3. Quasi-Judicial Hearings 6. Training for Councillors 7. Application by Councillor or Officer 9. Lobbying 10. Pre-hearing Discussions 13. Conduct of the Hearing 14. Councillors who are not on the committee 17. Record Keeping	4.1 Interests	4. Predisposition, Predetermination or Bias 5. Interests 8. Application by the Council (or where the Council is the landowner) 11. Site Visits 12. Relationship between members and officers 15. Making the Decision 16. Appeals 18. Procedure Notes

APPENDIX 1

5.3 Licensing Code of Conduct

CONTENTS

Section	Subject
1	Introduction
2	Legal Background
3	Before the Hearing
4	At the Hearing
5	Councillors who are not on the Committee
6	Complaints and Record Keeping

1. INTRODUCTION

- 1.1 Most decisions taken by Councillors are administrative in nature. The work of the Licensing Committee is different in that its proceedings are quasi judicial and the rules of natural justice apply. This imposes a new and higher set of standards on those Councillors who are involved in the decision-making process. Failure to abide by these standards may render the Council or individual Councillors open to challenge either through the courts or the Monitoring Officer/Standards Advisory Committee.
- 1.2 This Code provides a set of guidelines for Councillors on the standards which apply to the Licensing Committee. It is part of the Council's ethical framework and should be read in conjunction with the Members' Code of Conduct and the Member/Officer Protocol.

2. LEGAL BACKGROUND

2.1 Human Rights Act

- 2.1.1 The Human Rights Act 1998, which came into full effect on 2 October 2000, incorporated the key articles of the European Convention on Human Rights into domestic law. The Convention guarantees certain basic human rights. As far as possible legislation (including the licensing laws) must be interpreted in such a way as to conform with Convention rights. Decisions on licensing issues are actions of a public authority and so must be compatible with Convention rights.
- 2.1.2 Members of the Committee need to be aware of the rights contained in the Convention when making decisions and in particular:

- **Article 6: Right to a fair trial**

In the determination of a person's civil rights and obligations everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.

- **Article 8: *Right to respect for family and private life***

Everyone has a right to respect for his or her private life, and his or her home and correspondence.

- **Article 1: *of the First Protocol: Protocol of property***

Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his or her possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.

- **Article 14: *Prohibition of discrimination***

The enjoyment of the rights and freedoms in the Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.

2.1.3 Articles 6 and 14 are absolute but most Convention rights are not and in respect of those Articles there are circumstances when an interference with a person's rights is permitted, although any interference with the rights must be proportionate and go no further than is necessary.

2.2 Quasi-Judicial Hearings

2.2.1 A quasi-judicial hearing is one:

- which affects a person's livelihood;
- which involves disciplinary action; or
- which affects property

2.2.2 These hearings are subject to the rules of natural justice. Properly applied, the rules of natural justice will ensure that the requirements of the Convention that a hearing is both "fair" and presided over by an "independent and impartial tribunal" are met.

2.2.3 There are two principles underlying the rules of natural justice. First, all parties must be given a chance to put their case under conditions which do not put one party at a substantial disadvantage to the other party. All parties should be given sufficient notice of the hearing, the applicant should have disclosure of the nature of the objections as well as knowing who is objecting and there should be a right to question witnesses.

2.2.4 Second, a person who has an interest in an application must be disqualified from considering it. The Licensing Committee must be impartial – not only must there be no actual bias but there must be no perception of bias.

2.2.5 The procedure rules which govern hearings of the Licensing Committee reflect the requirements of the Human Rights Act and the rules of natural justice. To avoid any allegations of bias or perceived bias, Councillors sitting on the Licensing Committee must strictly observe those procedure rules.

3. BEFORE THE HEARING

3.1 Training of Councillors

3.1.1 Because the technical and propriety issues associated with licensing are not straightforward, it is the Council's policy to arrange training on the work of the Licensing Committee for all Councillors who sit on the Committee. Councillors must undertake the training (i) before participating in a meeting of the Committee and (ii) annually while they remain a member of the Committee. For a Member who has previously undertaken the full training and is re-appointed to the Committee for a further year without a break, only a refresher session is required. Other Councillors are free to attend the training in order to gain an understanding of licensing issues.

3.2 Application by a Councillor or Officer

3.2.1 The Licensing Committee may need to determine an application submitted by a Councillor or an officer, or by a company or individual with which a Councillor or officer has an interest or relationship. On receipt, the Corporate Director Communities, Localities and Culture will pass a copy of the application to the Monitoring Officer who will satisfy himself/herself that the application can be, and is being, processed and determined without suspicion or impropriety.

3.3 Lobbying

- 3.3.1** Councillors may be approached or lobbied by an applicant, agent or objector about a particular licensing application. Lobbying is a normal and perfectly proper part of the political process but it does not sit well with the quasi judicial nature of a Licensing Committee when a Councillor must enter the meeting with an open mind and make an impartial determination on the relative merits of all the evidence presented at the hearing. **Being lobbied in advance is incompatible with this high standard.**
- 3.3.2** If a member is approached s/he should advise the lobbyist to address any comments or concerns to the Corporate Director Communities, Localities and Culture. In no circumstances should a Councillor give an indication of voting intentions or otherwise enter into an unconditional commitment to oppose or support the application. To do so without all relevant information and views would be unfair and prejudicial. A Councillor who feels that s/he has been exposed to undue or persistent lobbying should advise the Monitoring Officer.
- 3.3.3** When attending a public meeting at which a licensing issue is raised, a member of the Licensing Committee should take great care to maintain an impartial role and not express a conclusive view on any pre-application proposals or submitted application.
- 3.3.4** Correspondence received by any member of the Council (whether on the Licensing Committee or not), should be passed without delay to the Corporate Director Communities, Localities and Culture so that all relevant views can be made available to those Councillors or officers responsible for determining the application. A reply by a Councillor should, as a rule, simply note the contents of the correspondence and advise that it has been passed to officers.

3.5 Discussions before the Hearing

- 3.5.1** Pre-application discussions – discussion between a potential applicant and representatives of the Council may be of considerable benefit to both parties. Similarly, a meeting between the Council and potential objectors may also be beneficial. However, it would be easy for such discussions to become or be seen (especially by objectors) to become part of a lobbying process. In the circumstances, pre-application discussions should be avoided by members of the Licensing Committee.
- 3.5.2** Post-application discussions – a Councillor should not approach an applicant for a licence in an effort to secure changes to the application. Such an approach would inevitably give rise to allegations of partiality or bias.

3.5.3 Generally, any contact with applicants should be conducted with and through officers and should always be reported to the Licensing Committee. Requests to a Councillor for a meeting should be passed to the Corporate Director, Communities, Localities and Culture.

3.6 Use of the Party Whip

3.6.1 The use of a party political whip is inconsistent with the rules of natural justice and should be avoided by Councillors sitting on the Licensing Committee.

4. AT THE HEARING

4.1 Interests

4.1.1 In order to avoid allegations of bias it is important that Councillors are scrupulous in declaring interests at the hearing.

4.1.2 A personal interest in a matter arises if a Councillor anticipates that a decision on it might reasonably be regarded as affecting (to a greater extent than other council tax payers, ratepayers or residents of the Council's area) the well-being or financial position of the Councillor, a relative or a friend or

- the employment or business carried out by those persons, or in which they might be investors (above a certain level)
- any of the bodies with which the Councillor is associated, and which the Councillor will have registered in the register of interests.

4.1.3 When a member considers that s/he has a personal interest, they must declare it at the start of the meeting or as soon as the interest becomes apparent. The full nature of the interest must be declared. The declaration and disclosure of a personal interest does not usually debar a Councillor from participation in the discussion.

4.1.4 A personal interest becomes a prejudicial interest when a member of the public, with knowledge of the relevant facts, would reasonably regard the interest as so significant that it is likely to prejudice the Councillor's judgement of the public interest. Working closely with an applicant or a group of objectors to achieve a certain outcome, lobbying other Councillors on the Committee or generally declaring voting intentions ahead of the meeting would usually indicate that a Councillor on the Committee has a prejudicial interest.

- 4.1.5 A Councillor with a prejudicial interest cannot participate in the discussion on the application and must leave the room when the discussion on the item begins or as soon as the interest becomes apparent. S/he cannot seek to influence the decision.
- 4.1.6 Being a member for the ward in which particular premises are situated is not necessarily declarable and as a general rule members of the Committee may deliberate on matters affecting their wards provided they do so with an open mind. To underline the openness of proceedings, the Licensing Committee agenda papers show which ward each member represents.
- 4.1.7 More information on what constitutes a personal or prejudicial interest as well as the obligation on Councillors to register their interests is contained in the Code of Conduct for Members set out in Part 5.1 of the Constitution. The ultimate responsibility for fulfilling these requirements rests with individual Councillors but the Council's Monitoring Officer or the Service Head, Democratic Services are available to give advice if required.

4.2 Conduct at the Hearing

- 4.2.1 The essence of the rules of natural justice are that Councillors not only act fairly but are also seen to act fairly. Councillors must follow agreed procedures at all times and should only ask questions at the appropriate points in the procedure. At no time should a Councillor express a view which could be seen as pre-judging the outcome. During the course of the hearing Councillors should not discuss (or appear to discuss) aspects of the case with the applicant, an objector, their respective advisers or any member of the public nor should they accept letters or documents from anyone other than the Clerk.
- 4.2.2 Again, to ensure compliance with the rules of natural justice, Councillors on the Committee must ensure that they hear the evidence and arguments for and against the application. If a Member arrives late for a meeting, s/he will not be able to participate in any item or application already under discussion. Similarly, if a Member has to leave the meeting for any length of time, s/he will not be able to participate in the deliberation or vote on the item or application under discussion at the time of their absence. If a Councillor needs to leave the room, s/he should ask the Chair for a short adjournment.

5. COUNCILLORS WHO ARE NOT ON THE COMMITTEE

- 5.1 A Councillor who is not a member of the Committee may speak at the meeting, with the agreement of the Chair, as an advocate for either the applicant or the objectors. A Councillor wishing to speak should submit a written statement within the consultation period. The applicant has the right to see any objections in advance.

S/he also has a right of reply. The Council will only entertain late objections in exceptional circumstances.

- 5.2** Councillors addressing the Committee should disclose any interests they may have, including the fact that they have been in touch with the applicant, the objectors or their respective agents and whether they are speaking on behalf of any of those people at the meeting.
- 5.3** A Councillor who is not on the Committee but who is at one of its meetings should normally sit apart from the Committee to demonstrate that they are not taking part in the discussion, consideration or vote. S/he should not communicate with Councillors on the Committee or pass papers or documents to them before or during the meeting. They may not attend briefings or accompany the Committee if it retires to deliberate in private.
- 5.4** A Councillor who has submitted an application or who otherwise has an interest in the application, should not attend the meeting at all but should arrange to be represented by others.
- 5.5** Councillors who are opposed in principle to any category of application or form of public entertainment, either in their own ward or borough-wide, should not seek nomination to the Committee.

6. RECORD KEEPING

- 6.1** In order that licensing procedures are undertaken properly and that any complaints can be fully investigated, record keeping will be complete and accurate. Every licensing application file will contain an accurate account of events throughout its life, particularly the outcomes of meetings, significant telephone conversations and any declarations of interests by Members.
- 6.2** The same principles of good record keeping will be observed in relation to all enforcement and licensing matters. Monitoring of record keeping will be undertaken regularly by the Head of Trading Standards and Environmental Health (Commercial) and the Team Leader (Licensing) in the Communities, Localities & Culture Directorate.

APPENDIX 2

5.3 Licensing Code of Conduct

CONTENTS

Section	Subject
1	Introduction
2	Human Rights Act
3	Quasi-Judicial Hearings
4	Predisposition, Predetermination, or Bias
5	Interests
6	Training of Councillors
7	Application by a Councillor or an Officer
8	Application by the Council (or where the Council is the landowner)
9	Lobbying
10	Pre-hearing discussions
11	Site Visits
12	Relationship between Councillors and Officers
13	Conduct at the Hearing
14	Councillors who are not on the Committee
15	Making the decision
16	Appeals
17	Record Keeping
18	Procedure Notes
Appendix	
A	Rules of Procedure Governing Applications for Premises Licences and other permissions under the Licensing Act 2003
B	Rules of Procedure for Sex Establishment Licences under Section 2 of and Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 (as amended)
C	Do's and Do Not's

1. INTRODUCTION

- 1.1** The Licensing Code of Conduct has been adopted by Tower Hamlets Council to regulate the performance of its licensing functions that fall within the Terms of Reference for the Licensing Committee. Its major objectives are to guide Councillors and officers of the Council in dealing with licensing related matters and to inform potential licensees and the public generally of the standards adopted by the Council in the exercise of its licensing functions. Except where otherwise stated, references in this Code are to the Licensing Committee and its Sub-Committees and the expression "Licensing Committee" should be interpreted accordingly.
- 1.2** The Licensing Code of Conduct is in addition to the Code of Conduct for Members adopted under the provisions of the Localism Act 2011. Councillors should follow the requirements of the Code of Conduct for Members and apply this Code in light of that Code. Whilst most decisions taken by Councillors are administrative in nature, the work of the Licensing Committee is different in that its proceedings are quasi-judicial and the rules of natural justice apply. This imposes a new and higher set of standards on those Councillors who are involved in the decision-making process.
- 1.3** The provisions of this Code are designed to ensure that licensing decisions are taken on proper licensing grounds, in a fair consistent and open manner and that Councillors making such decisions are, and are perceived as being, accountable for those decisions. The Code is also designed to assist Councillors in dealing with and recording approaches from applicants, licensees and objectors and is intended to ensure that the integrity of the decision-making process is preserved.
- 1.4** This Code is part of the Council's ethical framework and in addition to the Code of Conduct for Members should be read in conjunction with the Member/Officer Protocol. If a Councillor does not abide by the Code then that Councillor may put the Council at risk of proceedings on the legality or maladministration of the related decision and the Councillor may be at risk of either being named in a report to the Standards Advisory Committee or Council. A failure to abide by the Code is also likely to be a breach of the Code of Conduct for Members and which could result in a complaint being made to the Monitoring Officer.
- 1.5** **If a Councillor has any doubts about the application of this Code to their own circumstances they should seek advice early, from the Monitoring Officer and preferably well before any meeting takes place.**

2. HUMAN RIGHTS ACT

- 2.1** The Human Rights Act 1998, which came into full effect on 2nd October 2000, incorporated the key articles of the European Convention on Human Rights into domestic law. The Convention guarantees certain basic human rights. As far as possible legislation (including the licensing laws) must be interpreted in such a way as to conform to Convention rights. Decisions on licensing issues are actions of a public authority and so must be compatible with Convention rights.
- 2.2** Councillors of the Committee need to be aware of the rights contained in the Convention when making decisions and in particular:

Article 6: Right to a fair trial

In the determination of a person's civil rights and obligations everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.

Article 8: Right to respect for family and private life

1. Everyone has a right to respect for his or her private life, and his or her home and correspondence.
2. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

Article 1: of the First Protocol: Protocol of property

Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his or her possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.

The preceding provisions shall not, however, in any way impair the right of a State to enforce such laws as it deems necessary to control the use of property in accordance with the general interest or to secure the payment of taxes or other contributions or penalties.

Article 14: Prohibition of discrimination

The enjoyment of the rights and freedoms in the Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.

- 2.3** Article 6 is an 'absolute' right and cannot be interfered with. This means that these rights can never be detracted from because it is considered to be fundamental to the rights of people. The Licensing Committee's decisions on most licensing functions are subject to independent tribunals, usually the Magistrates' Court, so satisfying the provisions of Article 6. The Licensing Committee must however conduct a fair hearing in accordance with the rules of natural justice.
- 2.4** Article 8 and Article 1 of the First Protocol are both qualified rights and the Council can interfere with these provided that such interference had a clear legal basis. In therefore deciding whether to interfere with this right, Councillors should consider the matter within the framework of a 'fair balance' test. This requires that a balance be struck between the protection of the right of property and the general interests of the community. An interference with a person's rights must be proportionate and go no further than is necessary.
- 2.5** Specifically as to Article 1 of the First Protocol, an existing licence is a possession under this Article and therefore if a person does not currently hold a licence then it will not apply. Article 1 of the First Protocol also has relevance in respect of any third parties objecting to a licensing application, because of their right to the enjoyment of their property.
- 2.6** As to Article 14, whilst this is also an 'absolute' right it does not create an independent right as it only operates to prevent discrimination in the exercise of other convention rights. If there is discrimination however in respect of a particular protected right then there is no need to show a violation of the article giving such right for there to be a breach of Article 14. All it is necessary to show is that there has been discrimination. Accordingly, in exercising its Licensing Functions, the Council must not treat persons differently where such persons are placed in an analogous situation.

3. QUASI-JUDICIAL HEARINGS

3.1 A quasi-judicial hearing is one:

- which affects a person's livelihood;
- which involves disciplinary action; or
- which affects property

3.2 These hearings are subject to the rules of natural justice. Properly applied, the rules of natural justice will ensure that the requirements of the Convention that a hearing is both "fair" and presided over by an "independent and impartial tribunal" are met.

3.3 There are two principles underlying the rules of natural justice. First, all parties must be given a chance to put their case under conditions which do not put one party at a substantial disadvantage to the other party. All parties should be given sufficient notice of the hearing and the applicant should have disclosure of the nature of the objections/ representations as well as knowing who is objecting/ making a representation so that they can prepare a response to the points raised in such objections/ representations.

3.4 The rules of natural justice could also include asking questions of other parties. In respect of 'Alcohol and Entertainment Licensing' however, the Licensing Act 2003 (Hearings) Regulations 2005 ('the 2005 Regulations') provide that the hearing should take the form of a discussion led by the authority and cross-examination should not be permitted unless the Licensing Committee considers that cross-examination is required for it to consider the representations, application or notice as the case may require.

3.5 As to sufficient notice of the hearing, in respect of 'Alcohol and Entertainment Licensing', the 2005 Regulations also address this point as they specify the **period of time within which a hearing must be commenced; the minimum time before the hearing that notice should be given; persons to whom notice of hearing is to be given; and the documents to accompany notice of hearing. The 2005 Regulations do provide that a failure to comply with the Regulations does not of itself render the proceedings void but** where there is such an irregularity, the authority shall, if it considers that any person may have been prejudiced as a result of the irregularity, take such steps as it thinks fit to cure the irregularity before reaching its determination.

3.6 The Licensing Committee should always satisfy itself that sufficient notice of the hearing has been given to all parties and if not satisfied, then the Licensing Committee should take such steps as it thinks fit to deal with that issue before reaching its determination and this could include adjourning that application to a later date.

3.7 Second, a person who has an interest in an application must be disqualified from considering it. The Licensing Committee must be impartial – not only must there be no actual bias but there must be no perception of bias.

3.8 The procedure rules which govern hearings of the Licensing Committee reflect the requirements of the Human Rights Act and the rules of natural justice. To avoid any allegations of bias or perceived bias, Councillors sitting on the Licensing Committee must strictly observe those procedure rules.

3.9 The use of a party political whip is inconsistent with the rules of natural justice and must be avoided by Councillors sitting on the Licensing Committee.

4. PREDISPOSITION, PREDETERMINATION OR BIAS

- 4.1** Section 25 of the Localism Act 2011 ('the 2011 Act') provides that a Councillor should not be regarded as having a closed mind simply because they previously did or said something that, directly or indirectly, indicated what view they might take in relation to any particular matter. This reflects the common law position that a Councillor may be predisposed on a matter before it comes to Committee, provided they remain open to listening to all the arguments and changing their mind in light of all the information presented at the meeting. Nevertheless, a Councillor in this position will always be judged against an objective test of whether the reasonable onlooker, with knowledge of the relevant facts, would consider that the Councillor was biased.
- 4.2** As to predetermination, this is a legal concept and is used in situations where a decision maker either has, or appears to have, a closed mind. That is s/he has made up his/her mind in advance of proper consideration of an issue and the merits of an application. Section 25 of the 2011 Act does not amount to the abolition of the concept of predetermination however, as no one should decide a case where they are not impartial or seen to be impartial. Critically, Councillors need to avoid any appearance of bias or of having a predetermined view before taking a decision. Indeed, Councillors should not take a decision on a matter when they are actually biased in favour or against the application, or where it might appear to a fair and informed observer that there was a real possibility of bias, or where a Councillor has predetermined the matter by closing his/her mind to the merits of the decision.
- 4.3** Councillors must not make up their mind on how they will vote on any licensing matter prior to formal consideration of the matter at the meeting of the Licensing Committee and the Councillor hearing the evidence and arguments on both sides. A Councillor should not make comments on Licensing policy or procedures, or make any commitment in advance as to how they intend to vote on a matter, which might indicate that they have closed their mind.
- 4.4** **Any licensing decision made by a Councillor who can be shown to have approached the decision with a closed mind will expose the council to the risk of legal challenge.**
- 4.5** Clearly expressing an intention to vote in a particular way before a meeting (predetermination) is different from where a Councillor makes it clear they are willing to listen to all the considerations presented at the committee before deciding on how to vote (predisposition).
- 4.6** If a Councillor considers that s/he does have a bias or cannot be impartial then they should withdraw from being a Member of the Licensing Committee for that application.
- 4.7** Councillors should note that, unless they have a disclosable pecuniary interest or a significant personal interest (see section 5 below), they will not appear to be predetermined through-
- listening or receiving viewpoints from residents or other interested parties;
 - making comments to residents, interested parties, other Councillors or appropriate officers, provided they do not consist of or amount to prejudging the issue and the Councillor makes clear that they are keeping an open mind;
 - seeking information through appropriate channels; or
 - being a vehicle for the expression of opinion or speaking at the meeting as a Ward Councillor, provided the Councillor explains their actions at the start of the meeting or item and makes it clear that, having expressed the opinion or ward/ local view, they have not committed themselves to vote in accordance with those views and will make up their own mind having heard all the facts and listened to the debate.

4.8 The following advice applies:

- Councillors must not make up their mind, or appear to have made up their mind on how they will vote on any licensing matter prior to formal consideration of the matter at the meeting of the Licensing Committee and of the Councillor hearing evidence and arguments on both sides. This includes deciding or discussing how to vote on any application at any sort of political group meeting, or lobby any other Councillor to do so. If a Councillor has an interest in a local lobby group or charity or pressure group they may appear predetermined by their actions and/or statements made in the past. The Councillor should take advice from the Legal Adviser to the Licensing Committee on how to deal with this.
- It must be noted that if a Councillor is predetermined then taking part in the decision will put the Council at risk of a finding of maladministration and of legal proceedings on the grounds of there being a danger of bias or predetermination or, a failure to take into account all of the factors enabling the proposal to be considered on its merits.
- A Councillor may appear pre-determined where the Council is the landowner, developer or applicant and the Councillor has acted as, or could be perceived as being, a chief advocate for the proposal. This would arise where that through the Councillor's significant personal involvement in preparing or advocating the proposal the Councillor will be, or perceived by the public as being, no longer able to act impartially or to determine the proposal purely on its licensing merits.
- Councillors should recognise that in being a Councillor of a political group they are allowed to be predisposed in relation to licensing policies of the Council or to licensing policies of the Councillor's political party, providing that predisposition does not give rise to a public perception that the Councillor has, due to his/ her political membership, predetermined a particular matter.
- When considering a licensing application, Councillors must:
 - act fairly and openly;
 - approach each application with an open mind; carefully weigh up all relevant issues; and
 - determine each item on its own licensing merits
- And Councillors must not:
 - take into account irrelevant issues;
 - behave in a manner that may give rise to a public perception that s/he may have predetermined the item; and
 - behave in such a manner which may give rise to a public perception that s/he may have been unduly influenced in reaching a decision.

5. INTERESTS

5.1 In order to avoid allegations of bias it is important that Councillors are scrupulous in declaring interests at the hearing.

5.2 There are three (3) categories of interests, namely:

- Disclosable pecuniary interests (DPIs);
- Other registerable interests; and
- Non registerable interests

5.3 Chapter 7 of the 2011 Act places requirements on Councillors regarding the registration and disclosure of their pecuniary interests ('DPI') and the consequences for a Councillor taking part in consideration of an issue in the light of those interests. The definitions of DPI taken from the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 are set out in paragraph 5.1

of the Code of Conduct for Members. A Councillor must provide the Monitoring Officer with written details of relevant interests within 28 days of their election or appointment to office. These interests can be either an interest of the Member or an interest (of which the Member is aware) of a spouse, civil partner or a person that the Member is living with as a spouse or civil partner. Any changes to those interests must similarly be notified within 28 days of the Councillor becoming aware of such changes.

- 5.4** A failure to register or declare a DPI or the provision of false or misleading information on registration, or participation in discussion or voting in a meeting on a matter in which a Councillor has a DPI, are criminal offences.
- 5.5** A DPI relating to an item under discussion requires the immediate withdrawal of the Councillor from the Licensing Committee. In certain circumstances, a dispensation can be sought from the Monitoring Officer to take part in that particular item of business and which could arise where the Councillor is the applicant or has made a representation for or against the application.
- 5.6** Having regard to the rules of natural justice and the requirement that a Councillor who has an interest in an application must be disqualified from considering it, then consideration must also be given to other non-DPI personal interests that are either registrable as required by the Code of Conduct for Members or are personal interests that do not require registration.
- 5.7** A personal interest in a matter arises if a Councillor anticipates that a decision on it might reasonably be regarded as affecting (to a greater extent than other council tax payers, ratepayers or residents of the Council's area) the well-being or financial position of the Councillor, a relative or a friend or
- the employment or business carried out by those persons, or in which they might be investors (above a certain level)
 - any of the bodies with which the Councillor is associated, and which the Councillor will have registered in the register of interests.
- 5.8** If a Councillor has a personal interest in any licensing application or other matter before the Licensing Committee then the Member shall, if present, disclose the existence and nature of the interest at the start of the meeting and, in any event, before the matter is discussed or as soon as it becomes apparent. The full nature of the interest must be declared. The declaration and disclosure of a personal interest does not usually debar a Councillor from participation in the discussion or voting provided that the personal interest is not so significant that there is a real possibility of bias or predetermination and which is likely to prejudice the Councillor's judgement of the public interest (see 5.9 below).
- 5.9** The position is different however where a member of the public, with knowledge of the relevant facts, would reasonably regard the personal interest as so significant that there is a real possibility of bias or predetermination and which is likely to prejudice the Councillor's judgement of the public interest. Examples of this are working closely with an applicant or a group of objectors to achieve a certain outcome; lobbying other Councillors on the Committee; acting as an agent for a person pursuing a licensing matter with the Council; or generally declaring voting intentions ahead of the meeting etc.
- 5.10** A Councillor with a personal interest which might appear to a fair and informed observer that there was a real possibility of bias must not participate in the discussion on the application and must leave the room immediately when the discussion on the item begins or as soon as the interest becomes apparent. S/he cannot seek to influence the decision, save that if a member of the public has the right to attend the meeting, make representations, answer questions, or give evidence,

then a Councillor will have the same right. Once the Councillor has exercised that right then the Councillor must withdraw from the room for the rest of that item and play no further part in the discussion or vote.

- 5.11** Being a Councillor for the ward in which particular premises are situated is not necessarily declarable and as a general rule Councillors of the Committee may deliberate on matters affecting their wards provided they do so with an open mind. Councillors should remember, however, that their overriding duty is to the licensing objectives and not to the residents and businesses within their ward. Councillors have a duty to make decisions impartially, and should not improperly favour, or appear to improperly favour, any person, company, group or locality. If a Member feels that they cannot do this then the Member must leave the room when the discussion on the item begins.
- 5.12** More information on what constitutes an interest as well as the obligation on Councillors to register their interests is contained in the Code of Conduct for Members set out in Part 5.1 of the Constitution. The ultimate responsibility for fulfilling these requirements rests with individual Councillors but the Council's Monitoring Officer or the Service Head Legal Services are available to give advice if required.

6. TRAINING OF COUNCILLORS

- 6.1** As the technical and propriety issues associated with licensing are not straightforward, Councillors on the Licensing Committee must participate in a programme of training on the licensing system and related matters agreed by and organised by officers. The programme will consist of compulsory and discretionary elements. The aim of the training is to assist Members in carrying out their role properly and effectively. If a Councillor fails to participate in the compulsory elements of the training this may result in that Councillor being asked to stand down as a Councillor of the Licensing Committee.
- 6.2** Councillors should be aware that training is particularly important for Councillors who are new to the Licensing Committee and for Councillors who have not attended training in the recent past. Other Councillors are free to attend the training in order to gain an understanding of licensing issues.
- 6.3** Where a Member has a genuine difficulty in attending any particular training session officers will try when practicable to accommodate a request for an individual or repeat session.

7. APPLICATION BY A COUNCILLOR OR OFFICER

- 7.1** The Licensing Committee may need to determine an application submitted by a Councillor or an officer, or by a company or individual with which a Councillor or officer has an interest or relationship. For the avoidance of doubt, the term Councillor or an officer includes any former Councillors or officers. In such cases, it is vital to ensure that such application is handled in a way that gives no grounds for accusations or favouritism. Accordingly the matter will be dealt with as follows-
- (a) On receipt of such an application, a copy of the application will be referred to the Corporate Director.
 - (b) The Corporate Director will pass a copy of the application to the Monitoring Officer who will satisfy himself/ herself that the application can be, and is being, processed and determined without suspicion or impropriety.

- (c) If a Councillor or an officer submit their own proposal to the Council which they serve, they must take no part in its processing or the decision making process.
- (d) The Councillor making the application would almost certainly have a DPI and should not address the Committee as the applicant but should appoint an independent agent to represent his/her views.
- (e) Councillors of the Licensing Committee must consider whether the nature of any relationship with the person (either a Member or an officer) making the application requires that they make a declaration of interest and if necessary also withdraw from the meeting.
- (f) In respect of former Councillors or former officers the above requirements shall apply for a period of three (3) years following their departure from the Council.

8. APPLICATION BY THE COUNCIL (OR WHERE THE COUNCIL IS THE LANDOWNER)

- 8.1** Councillors may need to determine an application submitted by the Council for the Council's own land or in respect of land where the Council is the landowner. It is perfectly legitimate for such applications to be submitted to and determined by the Licensing Authority. Applications should be treated with the same transparency and impartiality as those of other applicants so as not to give rise to suspicions of impropriety.
- 8.2** If a Councillor has been heavily committed or involved in an area of policy/issue relating to such an application (e.g. as a Cabinet Member), then that Councillor must consider whether they have an interest which should be disclosed. In such circumstances, the Councillor should seek advice from the Legal Adviser to the Licensing Committee.

9. LOBBYING

- 9.1** Councillors may be approached or lobbied by an applicant, agent or objector about a particular licensing application. This can happen prior to an application being made or at any time after the application is made. Whilst lobbying is a normal and perfectly proper part of the political process, it can cause the perception of bias or predetermination especially when a Councillor must enter the meeting with an open mind and make an impartial determination on the relative merits of all the evidence presented at the hearing.
- 9.2** To avoid such perception, if a Member is approached then s/he should:
 - (a) inform such applicant or agent or interested party/ objector that such approach should be made to officers or to elected Councillors who are not Councillors of the Licensing Committee;
 - (b) forthwith notify in writing to the Monitoring Officer the fact that such an approach has been made, identifying the application, the nature of the approach, by whom it was made, and the action taken by the Member concerned; and
 - (c) keep an adequate written record so as to enable the Member to disclose the fact and nature of such an approach at any relevant meeting of the Licensing Committee.
- 9.3** If the Councillor does discuss the case then in no circumstances should a Councillor give an indication of voting intentions or otherwise enter into an unconditional commitment to oppose or support the application. To do so without all relevant information and views would be unfair and detrimental. As stated in 9.2(c) above, the Councillor must keep an adequate written record of the discussion so as to enable the Member to disclose the fact and nature of such an approach at any relevant meeting of the Licensing Committee.

- 9.4** If a Councillor who is not a Councillor of the Licensing Committee is contacted by an applicant, objector or interested party then that Councillor can discuss the issues raised by their constituent with the appropriate licensing officer and may forward any representations or evidence to that officer, who will, provided it is lawful, include the relevant information in the report to the Licensing Committee. If a Councillor wishes to make their own representations about a matter they should likewise make those representations to the appropriate Licensing officer.
- 9.5** When attending a public meeting at which a licensing issue is raised, a Councillor of the Licensing Committee should take great care to maintain an impartial role and not express a conclusive view on any pre-application proposals or submitted application. As stated in 9.2(c) above, the Councillor must keep an adequate written record of the discussion so as to enable the Member to disclose the fact and nature of such an approach at any relevant meeting of the Licensing Committee.
- 9.6** Correspondence received by any Councillor (whether on the Licensing Committee or not), should be passed without delay to the Corporate Director so that all relevant views can be made available to those Councillors or officers responsible for determining the application. A reply by a Councillor should, as a rule, simply note the contents of the correspondence and advise that it has been passed to officers.
- 9.7** Councillors should not accept gifts or hospitality from any person involved in or affected by licensing application. If a degree of hospitality is entirely unavoidable, then the Councillor must comply with the provisions in the Code of Conduct for Members on Gifts and Hospitality.
- 9.8** Councillors should not become a member of, lead or represent a national charity or local organisation whose primary purpose is to lobby to promote or oppose licensing applications. If a Councillor does then it is likely to appear to a fair and informed observer that there is a real possibility of bias and that Councillor will be required to withdraw from the debate and decision on that matter.
- 9.9** Councillors must also not lobby fellow Councillors regarding their concerns or views nor attempt to persuade them that they should decide how to vote in advance of the meeting at which any licensing decision is to be taken.

10. PRE HEARING DISCUSSIONS

- 10.1** Discussions between a potential applicant and representatives of the Council may be of considerable benefit to both parties. Similarly, a meeting between the Council and potential objectors may also be beneficial. However, it would be easy for such discussions to become or be seen (especially by objectors) to become part of a lobbying process. In the circumstances, pre-application discussions should be avoided by Councillors of the Licensing Committee.
- 10.2** Generally, any contact with applicants and/ or objectors should only be conducted with and through officers and should always be reported to the Licensing Committee. Requests to a Councillor for a meeting should be passed to the Corporate Director.

11. SITE VISITS

- 11.1** If a site visit takes place, its purpose is to gain information relating to the premises which are the subject of the licensing application or revocation to be considered by the Licensing Committee. A site visit may also assist Councillors in matters relating to the context of the application or revocation, the characteristics of the premises and the surrounding area. Councillors should avoid

expressing opinions during site visits to any person present, including other Members. Councillors can, of course, rely upon their own local knowledge.

- 11.2** During site visits, Councillors of the Licensing Committee shall not engage individually in discussion with applicants or objectors.
- 11.3** On site visits applicants, agents, objectors or other interested parties shall only be permitted to point out to Councillors features to look at either on the premises or in the vicinity, which are relevant to the application. No discussion will take place on the merits of the application or revocation.
- 11.4** A Councillor of a Licensing Committee may request a site visit, prior to the meeting of the Committee, in which case their name shall be recorded. They shall provide and a record be kept of:
- (i) their reason for the request; and
 - (ii) whether or not they have been approached concerning the application and if so, by whom

and unless the Councillor provides these at least one week prior to the relevant meeting, a site visit will not proceed.

- 11.5** If any Councillor of the Licensing Committee wishes to informally view an application's site then that viewing must only take place if it can be done from a public place. Councillors of the Licensing Committee shall not enter any premises which are the subject of a licensing application or known by them to be likely to become such in order to meet the agent, applicant, licensee or other interested party, save in the course of a formal accompanied site visit. In exceptional circumstances such as where a Councillor is unable to attend an official site visit that has been arranged, a site visit by an individual Councillor may be carried out provided that the Councillor is accompanied by a licensing officer.

12. RELATIONSHIP BETWEEN COUNCILLORS AND OFFICERS

- 12.1** Councillors of the Licensing Committee shall not attempt in any way to influence the terms of the officers' report upon any application.
- 12.2** Any criticism by Councillors of the Licensing Committee or an officer in relation to the handing of any licence application should be made in writing to the Corporate Director and/ or the Monitoring Officer and not to the Officer handling the application.
- 12.3** If any officer feels or suspects that pressure is being exerted upon him/ her by any Councillor of the Council in relation to any particular application, s/he shall forthwith notify the matter in writing to the Monitoring Officer.
- 12.4** If any officer of the Council who is involved in dealing with any licensing application has had any involvement with an applicant, agent or interested party, whether or not in connection with the particular application being determined, which could possibly lead an observer with knowledge of all the relevant facts to suppose that there might be any possibility that the involvement could affect the officer's judgement in any way, then that officer shall declare this interest in the public register held by the Monitoring Officer and take no part. This public register is to be available for inspection at the Licensing Committee meeting.
- 12.5** No officer of the Council shall engage in any paid work for any licensing matter for which Tower Hamlets is the Licensing Authority other than on behalf of the Council.

13. CONDUCT AT THE HEARING

- 13.1** The essence of the rules of natural justice is that Councillors not only act fairly but are also seen to act fairly. Councillors must follow agreed procedures at all times and should only ask questions at the appropriate points in the procedure. At no time should a Councillor express a view which could be seen as pre-judging the outcome. During the course of the hearing Councillors should not discuss (or appear to discuss) aspects of the case with the applicant, an objector, their respective advisers or any member of the public nor should they accept letters or documents from anyone other than an officer from Democratic Services or the Legal Advisor to the Committee.
- 13.2** Councillors of the Licensing Committee shall refrain from personal abuse and party-political considerations shall play no part in the Committee's deliberations. Councillors shall be respectful to the Chair and to each other and to officers and Members of the public including applicants, their agents and objectors and shall not bully any person.
- 13.3** When questioning witnesses at a meeting of a Licensing Committee, Councillors shall ensure that their questions relate only to licensing considerations relevant to the particular application.
- 13.4** Councillors must ensure that they hear the evidence and arguments for and against the application, in accordance with the rules of natural justice. Councillors must ensure that both the applicant and the objectors receive a fair hearing. Applicants must have the opportunity in advance of the hearing to prepare their case in answer to the objectors/ interested parties/ responsible authorities.
- 13.5** If a Councillor of the Licensing Committee arrives late for a meeting, s/he will not be able to participate in any item or application already under discussion. Similarly, if a Councillor has to leave the meeting for any length of time, s/he will not be able to participate in the deliberation or vote on the item or application under discussion at the time of their absence. If a Councillor needs to leave the room, s/he should ask the Chair for a short adjournment
- 13.6** It is permissible for the Chair of the meeting to curtail statements of parties or witnesses, if they are merely repeating matters which have already been given in evidence.
- 13.7** In considering objections/ representations Councillors are advised that if such are founded on a demonstrable misunderstanding of the true factual position, or otherwise indicate no more than an uninformed reaction to a proposal then they carry no weight whatever and must be ignored. Further Councillors are advised that the mere number of objections irrespective of their content can never be a good reason for refusing an application. What matters are the grounds on which such are based.
- 13.8** Also in considering the application, it may well be that hearsay evidence is presented. Councillors are advised that the strict rules of evidence do not apply in licensing applications and therefore hearsay is admissible. Indeed, hearsay might by its source, nature and inherent probability carry a greater degree of credibility than first hand evidence. What must be discounted, however, are gossip, speculation and unsubstantiated innuendo. In considering hearsay evidence, it should only be accepted where it can fairly be regarded as reliable although Councillors must give the other side a fair opportunity of commenting on it and contradicting it. Ultimately, hearsay evidence must be treated with great reservation by Councillors, who must make an assessment of its weight and credibility.
- 13.9** When new matters are raised as objections by any person at a hearing, the Licensing Committee is not obliged to hear them. However, if Councillors feel that the new matter raised by the objector should be considered, but the applicant needs further time to consider his/her response then the applicant should be offered an adjournment of the meeting (either for a short period during the

meeting itself or if necessary to a new date). (This paragraph does not apply to 'Alcohol and Entertainment Licensing' under the Licensing Act 2003 or 'Gambling Licensing' under the Gambling Act 2005, as new objections cannot be raised at the hearing).

14. COUNCILLORS WHO ARE NOT ON THE COMMITTEE

- 13.1** A Councillor who is not a member of the Committee may speak at the meeting, with the agreement of the Chair, as an advocate for either the applicant or the objectors. A Councillor wishing to speak should submit a written statement within the relevant consultation period. The applicant has the right to see any objections in advance. S/he also has a right of reply.
- 14.2** Councillors addressing the Committee should disclose any interests they may have, including the fact that they have been in touch with the applicant, the objectors or their respective agents and whether they are speaking on behalf of any of those people at the meeting.
- 14.3** A Councillor who is not on the Committee but who is at one of its meetings should normally sit apart from the Committee to demonstrate that they are not taking part in the discussion, consideration or vote. S/he should not communicate with Councillors on the Committee or pass papers or documents to them before or during the meeting. They may not attend briefings or accompany the Committee if it retires to deliberate in private..
- 14.4** Councillors who are opposed in principle to any category of application or form of public entertainment, either in their own ward or borough-wide, should not seek nomination to the Committee.

15. MAKING THE DECISION

- 15.1** The decision whether or not to grant a licensing application is a decision for the Councillors of the Licensing Committee only. The assessment of the weight and credibility of evidence is also for Councillors alone to decide.
- 15.2** Councillors shall retire to decide the matter in closed session. The Legal Officer and Democratic Services Officer present at the meeting will retire with them. During such closed session, the Legal Officer will only provide advice on legal issues relating to the application and will assist in the drafting of any proposed conditions to ensure that they are legally enforceable.
- 15.3** In accordance with regulations, Councillors considering applications relating to 'Alcohol and Entertainment Licensing' under the Licensing Act 2003 or 'Gambling Licensing' under the Gambling Act 2005 should disregard any information provided by any party which is not relevant to;
- a) their application, representations or notice (as applicable); and
 - b) the promotion of the licensing objectives or the crime prevention objective where notice has been given by the Police
- 15.4** Councillors will normally return to open session to announce its decision and give reasons for the same but in cases where the prescribed time limit allows for a later determination and it is appropriate to determine the matter within that time then the Chair will advise the parties present that the decision will not be announced then but that the determination will take place within the prescribed time limit and that written notification will be dispatched to all parties advising them of the determination.

- 15.5** Written notice of the decision together with Councillors' reasons will always be given and such notice will set out any rights of appeal against the decision.
- 15.6** Councillors own knowledge of the circumstances surrounding an application is valid provided that they are put to the applicant for a response. In reaching their decision Councillors must have regard to the evidence presented at the hearing, both the documents circulated in advance and the oral evidence. The decision must be based on the evidence alone and Councillors have a duty to ensure that they have regard to all the relevant matters before them and only those matters.
- 15.7** Councillors considering an application have a duty to determine it only on the facts before them relating to that individual case and not decide it as a matter of general policy. Councillors must not make unreasonable decisions that no other reasonable licensing authority would arrive at, having regard to the legal principle of "Wednesbury reasonableness".
- 15.8** In considering applications, Councillors must also have due regard to any Council Policy (e.g. the Council's Statement of Licensing Policy) and any statutory guidance (e.g. Licensing Guidance issued under section 182 of the Licensing Act 2003). Any departure from such should be justified and based on the facts before them.
- 15.9** Councillors should be aware that an unreasonable decision taking into account the above criteria is unlikely to be sustained on appeal. In this instance, the authority foregoes the opportunity to attach terms and conditions to a licence and will likely have to pay costs. The role of officers is to point this out and advise Councillors as to the potential risk of losing an appeal and being required to pay the other parties costs as a consequence. This needs to be balanced with the Council's fiduciary duty towards the local taxpayer in terms of the Council being a public body spending public money.

16. APPEALS

- 16.1** The Licensing Committee's decision is not a final one and applicants (and in certain cases interested parties and responsible authorities) have the right to appeal to the Magistrates Court and beyond in certain cases.
- 16.2** An appeal must be lodged within a prescribed time of receiving written notification of the decision.
- 16.3** On such appeals the hearing takes on an increasingly formalised nature, based solely on the evidence given. The Council will only be able to sustain its defence if it can substantiate its grant or refusal of a licence by relevant admissible evidence. Councillors who consider basing the grant or refusal of a licence on their personal knowledge should be prepared to testify to the relevant facts in any appeal proceedings.
- 16.4** Taking this factor into account along with the real risk of costs against the Council, Councillors must be wary of relying on any matters which could not readily be proved in evidence. Essentially, for Committee decisions to "stand up" on appeal and to avoid costs being awarded against the Authority, decisions to grant or refuse licences or impose conditions must be justified.

17. RECORD KEEPING

- 17.1** In order that licensing procedures are undertaken properly and that any complaints can be fully investigated, record keeping will be complete and accurate. Every licensing application file will contain an accurate account of events throughout its life, particularly the outcomes of meetings, significant telephone conversations and any declarations of interests by Councillors. Records will

be kept in accordance with the Council's Information Governance Framework and, specifically, the Council's Records Management Policy.

18. PROCEDURE NOTES

- 18.1** Appendix A to this Code of Conduct sets out the Rules of Procedure Governing Applications for Premises Licences and other permissions under the Licensing Act 2003.
- 18.2** Appendix B to this Code of Conduct sets out the Rules of Procedure Governing Applications for Sex Establishment Licences under Section 2 of and Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 (as amended)

TOWER HAMLETS



LICENSING COMMITTEE

**RULES OF PROCEDURE
GOVERNING APPLICATIONS FOR
PREMISES LICENCES
AND OTHER PERMISSIONS
UNDER THE LICENSING ACT 2003**

Date Last Reviewed:	14th June 2016
Approved By:	Licensing Committee
Date Approved:	14th June 2016
Version No.	2
Document Owner:	Paul Greeno
Post Holder:	Senior Corporate and Governance Lawyer
Date of Next Scheduled Review:	31st March 2017

1. Interpretation

- 1.1 These Procedures describe the way in which hearings will be conducted under the Licensing Act 2003, as set out in the Licensing Act 2003 (Hearings) Regulations 2005 (as amended) ('the Hearings Regulations'). The Procedures take into account the Licensing Act (Premises Licences and Club Premises Certificates) Regulations 2005.
- 1.2 Except where otherwise stated, references in this Code are to the Licensing Committee and its Sub-committees and the expression 'Licensing Committee' should be interpreted accordingly.
- 1.3 The Hearings Regulations provide (Regulation 21) that a Licensing Authority shall, subject to the provisions of those Regulations, determine for itself the procedure to be followed at a hearing.
- 1.4 These Procedures, therefore, set out the way in which Licensing Committee Meetings will be conducted under the Licensing Act 2003, following the requirements of the Hearings Regulations.
- 1.5 Proceedings will not be rendered void only as the result of failure to comply with any provision of the Hearings Regulations (Regulation 31) save that in any case of such an irregularity, the Licensing Committee shall, if it considers that any person may have been prejudiced as a result of the irregularity, take such steps as it thinks fit to cure the irregularity before reaching its determination (Regulation 32).

2. Composition of Sub-Committee

- 2.1 The Sub-Committee will consist of three (3) members and no business shall be transacted unless three (3) members of the Licensing Committee are present and able to form a properly constituted Licensing Sub-Committee. In such cases the Chair shall have a second or casting vote.

3. Procedure

- 3.1 The hearing shall take place in public save that the Licensing Committee may exclude the public from all or part of a hearing where it considers that, on balance, it is in the public interest to do so. The parties and any person representing them may be excluded in the same way as another member of the public. Any person so excluded may, before the end of the hearing, submit to the Licensing Committee in writing, any information which, they would have been entitled to give orally had they not been required to leave. Where there are a number of items on the agenda, the adjournment of that item for a short period, whilst another item is heard, may allow this process to be carried out effectively.
- 3.2 The Chair will begin by asking the parties to identify themselves and confirm whether or not they are represented.
- 3.3 The Licensing Committee should always satisfy itself that sufficient notice of the hearing has been given to all parties and if not satisfied, then the Licensing Committee should take such steps as it thinks fit to deal with that issue before reaching its determination and this could include adjourning that application to a later date.
- 3.4 The Licensing Committee will then consider any requests by a party for any other person to be heard at the hearing in accordance with the Regulations. Permission will not be unreasonably withheld provided proper notice has been given.
- 3.5 The Chair will then explain how the proceedings will be conducted, and indicate any time limits that may apply to the parties to the application. In setting time limits, the Licensing Committee will take into account the importance of ensuring that all parties receive a fair hearing, and the importance of

ensuring that all applications are determined expeditiously and without undue delay. Further the Licensing Committee must have regard to the requirement to allow each party an equal amount of time.

- 3.6 If a party considers that any time limit is not sufficient then they should address the Licensing Committee and which will determine accordingly.
- 3.7 If any party has informed the Authority that they will not be attending or be represented at the hearing or any party does not give notice that they will not be attending but fails to attend and is not represented, the Licensing Committee may proceed in their absence or adjourn the hearing if it considers it to be necessary in the public interest. An adjournment will not be considered where due to the operation of the Hearing Regulations it would not be possible to adjourn.
- 3.8 If the Licensing Committee adjourns the hearing to a specified date it must specify the date, time and place to which the hearing has been adjourned and why it is considered necessary in the public interest.
- 3.9 If the Licensing Committee holds the hearing in the absence of a party, it will consider at the hearing the application, representation or notice given by that party.
- 3.10 The Chair will invite an Officer of the Licensing Section to present the report by briefly summarising the application and the number and type of the representations as set out in the papers circulated. The Officer will also advise of any discussions held with the parties; any amendments made to the application; any representations withdrawn; and any agreed conditions that the Licensing Committee is being asked to consider. The Officer shall not give any opinion on the application or ask the Committee to make an inference based on such an opinion.
- 3.11 Members of the Licensing Committee can then ask questions of clarification of the Licensing Officer or seek legal advice from the Legal Adviser to the Licensing Committee if they require in respect of matters raised during the presentation by the Licensing Officer.
- 3.12 The Legal Adviser to the Licensing Committee will then give any relevant legal advice that the Licensing Committee need to take into consideration.
- 3.13 The Chair will then ask the applicant or their representative, if present, to present a summary of the nature and extent of the application. This should be brief, avoid repetition of material already available to the Licensing Committee in the Officer's report or otherwise, and include any reasons why an exception should be made to the Council's Licensing Policy, where appropriate, and respond to the written representations received. The submission may be followed by the evidence of any person who has been given permission by the Committee to give supporting evidence on behalf of the applicant or who has made a representation in favour of the application.
- 3.14 The application is to be presented within the time limit that has been set.
- 3.15 Where an applicant is unrepresented and having difficulty in presenting their application then the Legal Adviser to the Licensing Committee may ask questions of the applicant so that the relevant points are addressed and clarified for the Licensing Committee.
- 3.16 Members of the Licensing Committee may ask questions of the person presenting the case after their address as well as any other person who has spoken in support of the application. Members can also ask questions of the applicant as well as any other person present for the applicant who they consider can assist.

- 3.17 The Legal Adviser to the Licensing Committee may ask questions for the purpose of clarifying points for the Licensing Committee.
- 3.18 The Chair will then ask the persons who have made representations against the application to address the Licensing Committee within the time limit that has been set. They should not repeat what is already set out in their representations or notice or raise new matters. In their address they should provide clarification on any points previously requested by the Council. The submission may be followed by the evidence of any person who has been given permission by the Committee to give supporting evidence.
- 3.19 Members of the Licensing Committee may then ask questions of the persons making representations against the application and any other person who has spoken in support of such representation. Members can also ask questions of any other person present who they consider can assist.
- 3.20 The Legal Adviser to the Licensing Committee may ask questions for the purpose of clarifying points for the Licensing Committee.
- 3.21 Petitions will be treated as representations provided they meet the requirements for relevant representations set out in the Licensing Act 2003. Members should proceed with caution when relying upon petitions used as evidence due to the structure and wording used.
- 3.22 The Licensing Committee will disregard any information given by a party, or any other person appearing at the hearing, which is not relevant to:
- a) their application, representation or notice; and
 - b) the promotion of the licensing objectives or the crime prevention objective where notice has been given by the police
- 3.23 The Chair will intervene at any stage of the hearing to prevent repetitious or irrelevant points being raised.
- 3.24 Cross examination of any party or any other person allowed to appear will not be allowed unless specifically permitted by the Chair.
- 3.25 There is no right for any party to sum up but they may be permitted to do at the discretion of the Chair and within time limits prescribed by the Chair.
- 3.26 The Licensing Committee will consider its decision in private save that the Legal Adviser and Democratic Services Officer will remain with them.
- 3.27 The Licensing Committee will normally return to open session to announce its decision but in cases where the prescribed time limit allows for a later determination and it is appropriate to determine the matter within that time then the Chair will advise the parties present that the decision will not be announced then but that the determination will take place within the prescribed time limit and that written notification will be dispatched to all parties advising them of the determination.
- 4. Exclusions**
- 4.1 In addition to any exclusion under paragraph 3.1 above, The Licensing Committee may require any person attending the hearing who in their opinion is behaving in a disruptive manner to leave the hearing and may refuse to permit the person to return; or allow them to return only on such conditions as Licensing Committee may specify.

- 4.2 Any person so excluded may, before the end of the hearing, submit to the Authority in writing, any information which, they would have been entitled to give orally had they not been required to leave.

TOWER HAMLETS**LICENSING COMMITTEE**

**RULES OF PROCEDURE
GOVERNING APPLICATIONS FOR
SEX ESTABLISHMENT LICENCES
UNDER SECTION 2 OF AND SCHEDULE 3 TO THE LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS)
ACT 1982**

Date Last Reviewed:	22nd September 2016
Approved By:	Licensing Committee
Date Approved:	14th June 2016
Version No.	2
Document Owner:	Paul Greeno
Post Holder:	Senior Corporate and Governance Lawyer
Date of Next Scheduled Review:	31st March 2017

1. Interpretation

- 1.1 These Procedures describe the way in which hearings will be conducted under section 2 of and schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 as amended.

2. Composition of the Licensing Committee

- 2.1 The Licensing Committee will consist of fifteen (15) members and no business shall be transacted unless at least three (3) members of the Licensing Committee are present and able to form a properly constituted Licensing Committee. The Chair shall have a second or casting vote.

3. Procedure

- 3.1 The hearing shall take place in public save that the Licensing Committee may exclude the public from all or part of a hearing where it considers that, on balance, it is in the public interest to do so. The parties and any person representing them may be excluded in the same way as another member of the public. Any person so excluded may, before the end of the hearing, submit to the Licensing Committee in writing, any information which, they would have been entitled to give orally had they not been required to leave. Where there are a number of items on the agenda, the adjournment of that item for a short period, whilst another item is heard, may allow this process to be carried out effectively.
- 3.2 The Chair will begin by asking the parties to identify themselves and confirm whether or not they are represented.
- 3.3 The Licensing Committee should always satisfy itself that sufficient notice of the hearing has been given to all parties and if not satisfied, then the Licensing Committee should take such steps as it thinks fit to deal with that issue before reaching its determination and this could include adjourning that application to a later date.
- 3.4 The Chair will explain how the proceedings will be conducted, and indicate any time limits that will be imposed on the parties. In setting time limits, the Licensing Committee will take into account the importance of ensuring that all parties receive a fair hearing, and the importance of ensuring that all applications are determined expeditiously and without undue delay. Further the Licensing Committee should allow each party an equal amount of time.
- 3.5 If a party considers that any time limit is not sufficient then they should address the Licensing Committee and which will determine accordingly.
- 3.6 If any party has informed the Authority that they will not be attending or be represented at the hearing or any party does not give notice that they will not be attending but fails to attend and is not represented, the Licensing Committee may proceed in their absence or adjourn the hearing.
- 3.7 If the Licensing Committee adjourns the hearing it should specify the date, time and place to which the hearing has been adjourned.
- 3.8 If the Licensing Committee holds the hearing in the absence of a party, it will consider at the hearing the application or objection given by that party.
- 3.9 The Chair will invite an Officer of the Licensing Section to present the report by briefly summarising the application and the number and type of the representations as set out in the papers circulated. The Officer will also advise of any discussions held with the parties; any amendments made to the application; any objections withdrawn; and any agreed conditions that the Licensing Committee is

being asked to consider. The Officer shall not give any opinion on the application or ask the Committee to make an inference based on such an opinion.

- 3.10 Members of the Licensing Committee can then ask questions of clarification of the Licensing Officer or seek legal advice from the Legal Adviser to the Licensing Committee if they require in respect of matters raised during the presentation by the Licensing Officer.
- 3.11 The Legal Adviser to the Licensing Committee will then give any relevant legal advice that the Licensing Committee need to take into consideration.
- 3.12 The Chair will then ask the applicant or their representative, if present, to state their case. This should avoid repetition of material already available to the Licensing Committee in the Officer's report or otherwise, and include any reasons why an exception should be made to the Sex Establishment Licensing Policy, where appropriate; address, where appropriate, the matters stated in the Sex Establishment Licensing Policy that the Licensing Committee will take into account when considering applications; and respond to the written objections received. The submission may be followed by the evidence of any person who is giving supporting evidence on behalf of the applicant or who has made a representation in favour of the application.
- 3.13 The application is to be presented within any time limit that has been set.
- 3.14 Where an applicant is unrepresented and having difficulty in presenting their application then the Legal Adviser to the Licensing Committee may ask questions of the applicant so that the relevant points are addressed and clarified for the Licensing Committee.
- 3.15 The objectors (or their representative) will be invited to question the applicant.
- 3.16 Members of the Licensing Committee may ask questions of the applicant and/ or their representative as well as any other person who has spoken in support of the application. Members can also ask questions of any other person present for the applicant who they consider can assist.
- 3.17 The Legal Adviser to the Licensing Committee may ask questions for the purpose of clarifying points for the Licensing Committee.
- 3.18 The Chair will then ask objectors against the application to state their case within any time limit that has been set. The objectors should not repeat what is already set out in their objections. In stating their case, the objectors should provide clarification on any points previously requested by the Council. The submission may be followed by the evidence of any person who is giving supporting evidence.
- 3.19 The applicant (or their representative) will be invited to question the objectors.
- 3.20 Members of the Licensing Committee may then ask questions of the objectors and any other person who has spoken given evidence in support. Members can also ask questions of any other person present who they consider can assist.
- 3.21 The Legal Adviser to the Licensing Committee may ask questions for the purpose of clarifying points for the Licensing Committee.
- 3.22 Petitions will be considered but Members should proceed with caution when relying upon petitions used as evidence due to the structure and wording used.
- 3.23 The Chair will intervene at any stage of the hearing to prevent repetitious or irrelevant points being raised.

- 3.24 The objectors (or their representative) will then be permitted to “Sum Up”.
- 3.25 The applicant (or their representative) will then be permitted to “Sum Up”.
- 3.26 The Licensing Committee will consider its decision in private save that the Legal Adviser and Democratic Services Officer will remain with them.
- 3.27 The Licensing Committee will normally return to open session to announce its decision but where they consider it appropriate for the determination to be given at a later time then the Chair will advise the parties present that the decision will not be announced then but that the determination will take place later and that written notification will be dispatched to all parties advising them of the determination.

4. Exclusions

- 4.1 In addition to any exclusion under paragraph 3.1 above, The Licensing Committee may require any person attending the hearing who in their opinion is behaving in a disruptive manner to leave the hearing and may refuse to permit the person to return; or allow them to return only on such conditions as Licensing Committee may specify.
- 4.2 Any person so excluded may, before the end of the hearing, submit to the Authority in writing, any information which, they would have been entitled to give orally had they not been required to leave.


DO'S AND DO NOT'S**1. Councillors must:**

- (a) Attend compulsory training sessions;
- (b) Be open minded and impartial;
- (c) Declare any actual interest;
- (d) Listen to the arguments for and against;
- (e) Carefully weigh up all relevant issues;
- (f) Ask questions that relate only to licensing considerations relevant to the particular application;
- (g) Make decisions on merit and on licensing considerations only;
- (h) Respect the impartiality and integrity of the Council's officers;
- (i) Report any lobbying from applicants, agents, objectors or any other Councillor;
- (j) Promote and support the highest standards of conduct; and
- (k) Promote equality and not discriminate unlawfully against any person, and treat all people with respect.

2. Councillors must not:

- (a) Be biased or give the impression of being biased;
- (b) Improperly confer an advantage or disadvantage on any person nor seek to do so;
- (c) Act to gain a financial or other benefit for themselves, their family, friends or close associates;
- (d) Place themselves under a financial or other obligation to any individual or organisation that might seek to influence the performance of their duties as a member (e.g. by accepting gifts or hospitality from any person involved in or affected by a licensing application);
- (e) Place themselves in a position where their integrity might reasonably be questioned;
- (f) Participate in a meeting where they have a DPI;
- (g) Participate in a meeting where they have an interest which does or could be reasonably considered as giving rise to bias; and
- (h) Express opinions during any site visit to any person present, including other Members.

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Non-Executive Report of the: Council 5 December 2016	 TOWER HAMLETS
Report of: Graham White, Acting Corporate Director, Law Probity and Governance and Deputy Monitoring Officer	Classification: Unrestricted
New Grants Procedure	

Originating Officer(s)	Paul Greeno, Senior Corporate and Governance Lawyer
Wards affected	All wards

Summary

This report is being written in the anticipation that DCLG will withdraw the Directions in respect of grants permitting decisions in relation to such to be undertaken by the Mayor in a Grants Determination Sub-Committee to be held in public.

Recommendations:

Council is recommended to:

1. Note that the Mayor has updated his Executive Scheme of Delegation, namely paragraph 6.2 to note that the Mayor has appointed a Grants Determination Sub-Committee;
2. As the Executive Scheme of Delegation is included at Rule 3 of these Executive Procedure Rules contained with Part 4.4 of the Constitution, note that the amended Executive Procedure Rules as contained in Appendix 1 will be added to the Constitution.
3. As there is now a Grants Determination Sub-Committee, the Mayor has also provided Terms of Reference for the Grants Determination Sub-Committee and which will be added to part 3.4 of the Constitution, i.e. The Executive, as contained in Appendix 2 and which will also be added to the Constitution.
4. To agree that the Constitution be amended by the addition of the new Executive Scheme of Delegation at Appendix 1 and the new part 3.4 of the Constitution at Appendix 2

1. REASONS FOR THE DECISIONS

- 1.1 The Council's Constitution provides that all executive functions of the Council except those reserved to DCLG Commissioners by the Directions of 17 December 2014 are vested in the Mayor. The Mayor may exercise those functions himself, or may delegate specified executive functions to be exercised by the Cabinet meeting, a Cabinet committee, an individual Cabinet Member or an officer; or under the provisions of Section 236 of the Local Government and Public Involvement in Health Act 2007 only, by a ward councillor.
- 1.2 As the potential withdrawal of the Directions in respect of grants is predicated on decisions in relation to grants being taken by the Mayor in a public meeting then this is achieved by the Mayor setting up a Sub-Committee of Cabinet, namely the Grants Determination Sub-Committee. The Membership of this Sub-Committee is the Mayor and two (2) other Executive Members (to be appointed) or their nominees. The quorum of this Sub-Committee is three (3) and specific Terms of Reference agreed.

2. ALTERNATIVE OPTIONS

- 2.1 None. The Mayor has established the Grants Determination Sub-Committee. Likewise the Mayor has determined the Terms of Reference. These are now in place. The changes to the Constitution are not necessary to give effect to these changes but as a matter of good governance, it is appropriate to advise Council of these changes and ask for Council to agree the revisions to the Constitution.

3. DETAILS OF REPORT

- 3.1 The power of the commissioners to make decisions in relation to grants arises from directions made by the Secretary of State on 17 December 2014 pursuant to powers under sections 15(5) and 15(6) of the Local Government Act 1999 (the Directions). Paragraph 4(ii) and Annex B of the Directions together provide that, until 31st March 2017, the Council's functions in relation to grants will be exercised by appointed Commissioners, acting jointly or severally. This is subject to an exception in relation to grants made under section 24 of the Housing Grants, Construction and Regeneration Act 1996, for the purposes of section 23 of that Act (disabled facilities grant).
- 3.2 In anticipation of DCLG withdrawing the Directions, it has been necessary to consider what procedural and constitutional changes are required and what steps need to be undertaken to do this.
- 3.3 Firstly, pursuant to the Constitution, the Executive is responsible for all functions of the authority that are not reserved to the Council by the law or by this Constitution or have been allocated to DCLG Commissioners by the

Directions of 17 December 2014. Decisions in relation to Grants are executive functions.

- 3.4 Further, the Constitution provides that all executive functions of the Council except those reserved to DCLG Commissioners by the Directions of 17 December 2014 are vested in the Mayor. The Mayor may exercise those functions himself, or may delegate specified executive functions to be exercised by the Cabinet meeting, a Cabinet committee, an individual Cabinet Member or an officer; or under the provisions of Section 236 of the Local Government and Public Involvement in Health Act 2007 only, by a ward councillor.
- 3.5 As the potential withdrawal of this part of the Directions is predicated on decisions in relation to grants being taken by the Mayor in a public meeting then the Mayor has set up a Sub-Committee of Cabinet, namely the Grants Determination Sub-Committee. The Membership of this Sub-Committee consists of the Mayor and two (2) other Executive Councillors (to be appointed) or their nominees who must also be Executive Councillors. The quorum of this Sub-Committee is 3. The Mayor has also determined the Terms of Reference for the Grants Determination Sub-Committee.
- 3.6 As an Executive Meeting, the normal rules in respect of publication etc. still apply.
- 3.7 Further, the Grants Scrutiny Sub-Committee will still provide a pre-scrutiny of grants by:
 - (a) Reviewing and/or scrutinising decisions made or actions taken in connection with the discharge of the Council's grants;
 - (b) Advising the Grants Determination Sub-Committee of key issues/questions arising in relation to grants reports due to be considered by the Grants Determination Sub-Committee; and
 - (c) Making reports and/or recommendations to the Grants Determination Sub-Committee in connection with the discharge of grants functions.
- 3.8 As the Grants Determination Sub-Committee will replace the Commissioners' Decision Making Meetings then the schedule of meetings will be the same as those for the Commissioners' Decision Making Meetings.
- 3.9 For all of this to be achieved, the Mayor has amended the Executive Scheme of Delegation (see Appendix 1) and has provided Terms of Reference for the Grants Determination Sub-Committee (see Appendix 2). The Mayor has then provided to the Acting Monitoring Officer the updated scheme and Terms of Reference.
- 3.10 This report to full Council is advising of these changes and that the Executive Scheme of Delegation contained in the Executive Procedure Rules at Part 4.4 of the Constitution require revision and that Part 3.4 setting out the responsibilities for Functions of the Executive also require revision.

- 3.11 All officer delegations agreed by the Commissioners will require to be re-determined by the Mayor.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 There are no financial implications arising from this report.

5. LEGAL COMMENTS

- 5.1 Relevant comments upon the appropriate legal framework are contained in the body of the report. There are no immediate legal implications arising from this report.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 This is a continuation of the Council's improvement to its organisational culture. These proposed revisions will lead to better efficiency, transparency and accountability of decision making and which should help to achieve the objectives of equality and personal responsibility inherent in One Tower Hamlets.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 The Council has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. This is referred to as the Council's best value duty.

- 7.2 By virtue of Directions made by the Secretary of State on 17 March 2015 the Council was required to draw up and agree with the Commissioners a strategy and action plan for securing the Authority's compliance with the best value duty. Part of that plan included recommendations regarding Organisational Culture and as part of this, the Commissioners have identified steps that the Council are required to take to allow decision making in respect of grants. Therefore, whilst the report does not propose any direct expenditure, it is looking to put in place arrangements in the exercise of its functions having regard to efficiency and thereby also economy and effectiveness.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 There are no environmental implications associated with this strategy.

9. RISK MANAGEMENT IMPLICATIONS

9.1 These proposed revisions will lead to better efficiency, transparency and accountability of decision making. The overall aim is therefore to reduce risk.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

10.1 There are no crime and disorder reductions implications.

Linked Reports, Appendices and Background Documents

Linked Report

NONE

Appendices

- Appendix 1: Revised Part 4.4 of the Constitution
- Appendix 2: Revised Part 3.4 of the Constitution

Local Government Act, 1972 Section 100D (As amended)

List of "Background Papers" used in the preparation of this report

- NONE.

Officer contact details for documents:

- N/A

APPENDIX 1

4.4 Executive Procedure Rules

CONTENTS

Rule	<u>Subject</u>
1	How Does the Executive Operate?
2	How are Executive Meetings Conducted?
3	The Mayor's Executive Scheme of Delegation

1. HOW DOES THE EXECUTIVE OPERATE?

1.1 Who May Make Executive Decisions?

In law, functions which are the responsibility of the Executive may be exercised by

- (a) The Mayor
- (b) The Executive as a whole (the Cabinet) ;
- (c) A Committee of the Executive;
- (d) An individual Member of the Executive;
- (e) The Chief Executive, a Chief Officer or an officer;
- (f) An area Committee; or a ward councillor in accordance with Section 236 of the Local Government and Public Involvement in Health Act 2007;
- (g) joint arrangements; or
- (h) another local authority;

subject to the Mayor or this Constitution giving delegated authority to the person/meeting listed to discharge the particular function.

The arrangements for the discharge of executive functions at Tower Hamlets are set out in the executive arrangements adopted by the Council (see Part 2, Article 7 and Part 3 of this Constitution) and the Executive Scheme of Delegation at Rule 3 of these Rules.

Currently decisions on executive functions are taken by the Mayor, either at the Cabinet meeting or separately, unless the Mayor has delegated either a function as set out in those parts of the Constitution or a specific executive decision.

1.2 The Executive Scheme of Delegation and Executive Functions

At the Annual Meeting of the Council the Mayor will present to the Council a written record of delegations made by the Mayor ('The Executive Scheme of Delegation') for inclusion in the Council's Constitution. The document presented by the Mayor must contain the following information in so far as it relates to executive functions:

- (a) The extent of any authority delegated to any individual Executive Member or ward councillor including details of the limitation on their authority.
- (b) The terms of reference and constitution of such Executive Committees as the Mayor appoints and the names of Executive Members appointed to them.
- (c) The nature and extent of any delegation of executive functions to area Committees, any other authority or any joint arrangements and the names of those Executive Members appointed to any joint Committee for the coming year.
- (d) The nature and extent of any delegation of executive functions to officers not already specified in Part 3 of this Constitution, with details of any limitation on that delegation and the title of the officer to whom the delegation is made.

The Mayor may amend or revoke any delegation of an Executive function at any time.

The Executive Scheme of Delegation shall be included at Rule 3 of these Rules.

Within five (5) working days of agreeing any change to the Executive Scheme of Delegation, a Cabinet appointment or portfolio, the Mayor shall present a written record of the change that s/he has agreed, together with the reasons for that change, to the Monitoring Officer.

Whenever the Monitoring Officer receives notification from the Mayor of any change(s) to the Executive Scheme of Delegation, Cabinet appointment(s) or portfolio(s), the Monitoring Officer will inform all Councillors of the change(s) made and any reasons given by the Mayor.

1.3 Sub-Delegation of Executive Functions

- (a) Where the Mayor, the Executive, a Committee of the Executive or an individual Member of the Executive is responsible for an executive function, they may delegate further to an area Committee, joint arrangements or an officer.
- (b) Unless the Mayor directs otherwise, if the Mayor delegates functions to the Executive then the Executive may delegate further to a Committee of the Executive or an officer.

- (c) Unless the Mayor directs otherwise, a Committee of the Executive to whom functions have been delegated may delegate further to an officer.
- (d) Even where executive functions have been delegated, that fact does not prevent the discharge of delegated functions by the person or body who delegated them.

1.4 The Council's Scheme of Delegation and Executive Functions

- (a) Subject to (b) below, the Council's Scheme of Delegation will be subject to adoption by the Council and may only be amended by the Council. It will contain the details required in Part 2, Article 7 and set out in Part 3 of this Constitution.
- (b) The Mayor may amend the Scheme of Delegation of executive functions at any time during the year. To do so, the Mayor must give written notice to the Monitoring Officer and the person, body or Committee concerned. The notice must set out the extent of the amendment to the Scheme of Delegation, and whether it entails the withdrawal of delegation from any person, body or Committee or the Executive as a whole. The Monitoring Officer will inform all Councillors of the change(s) made and any reasons given by the Mayor.
- (c) Where the Mayor seeks to withdraw or amend delegations to a Committee, notice will be deemed to be served on that Committee when it has been served on its Chair.

1.5 Interests

- (a) Where a Member of the Executive has a disclosable pecuniary interest this should be dealt with as set out in the Council's Code of Conduct for Members at Part 5.1 of this Constitution.
- (b) If every Member of the Executive has either a registerable or non-registerable interest and either interest might appear to a fair and informed observer that there was a real possibility of the Members' judgement being or likely to be impaired by the interest then this also should be dealt with as set out in the Council's Code of Conduct for Members in Part 5.1 of this Constitution.
- (c) Where a Member of the Executive has either a registerable or non-registerable interest and either interest might appear to a fair and informed observer that there was a real possibility of the Member's judgement being or likely to be impaired by the interest then this should be dealt with as set out in the Council's Code of Conduct for Members at Part 5.1 of this Constitution.
- (d) If the exercise of an executive function has been delegated to a Committee of the Executive, an individual Member, the Chief Executive, a Chief Officer or an officer, and should a disclosable pecuniary interest arise, then the function will be exercised in the first instance by the person or body by whom the

delegation was made or otherwise as set out in the Council's Code of Conduct for Members at Part 5.1 of this Constitution.

- (e) If the exercise of an executive function has been delegated to a Committee of the Executive, an individual Member, the Chief Executive, a Chief Officer or an officer, and should either a registerable or non-registerable interest and either interest might appear to a fair and informed observer that there was a real possibility of that person's judgement being or likely to be impaired by the interest arise, then the function will be exercised in the first instance by the person or body by whom the delegation was made or otherwise as set out in the Council's Code of Conduct for Members at Part 5.1 of this Constitution..

1.6 Meetings of the Cabinet

- (a) Meetings of the Cabinet will be determined by the Mayor or Chief Executive. The Cabinet shall normally meet at the Council's main offices or at another location as appropriate.
- (b) Meetings of the Cabinet will be subject to the Access to Information Procedure Rules and any other relevant procedure rules in this Constitution.

1.7 Quorum

The quorum for a meeting of the Executive shall be three (3) Members

1.8 How are Decisions to be taken by the Executive?

- (a) Executive decisions which are the responsibility of the Cabinet as a whole will be taken at a meeting convened in accordance with the Access to Information Rules in Part 4 of the Constitution.
- (b) Where executive decisions are delegated to a Committee of the Executive, the rules applying to executive decisions taken by them shall be the same as those applying to those taken by the Executive as a whole.

2. HOW ARE EXECUTIVE MEETINGS CONDUCTED?

2.1 Who Presides?

If the Mayor is present s/he will preside. In her/his absence, then the Deputy Mayor shall preside. In the absence of both the Mayor and the Deputy Mayor, then a person appointed by those present shall preside.

2.2 Who may Attend?

- (a) Meetings of the Cabinet will normally be open to the public unless confidential or exempt information is to be discussed.
- (b) Subject to the Access to Information Procedure Rules in Part 4 of this Constitution, meetings may occasionally be private.

2.3 What Business?

At each meeting of the Cabinet the following business will be conducted:

- (a) consideration of the minutes of the last meeting;
- (b) declarations of disclosable pecuniary interest, if any;
- (c) matters set out in the agenda for the meeting, and which shall indicate which are key decisions and which are not, in accordance with the Access to Information Procedure Rules set out in Part 4 of this Constitution.
- (d) consideration of reports from the Overview and Scrutiny Committee;
- (e) matters referred to the Executive (whether by the Overview and Scrutiny Committee or by the Council) for reconsideration by the Executive in accordance with the provisions contained in the Overview and Scrutiny Procedure Rules or the Budget and Policy Framework Procedure Rules set out in Part 4 of this Constitution;

The Mayor or other person presiding at a meeting of the Cabinet may at his/her discretion allow persons other than Cabinet members to contribute to the meeting. This may include an informal 'question time' to the Mayor and/or Cabinet Members.

2.4 Community Engagement/ Consultation

All reports to the Executive from any Member of the Executive or an officer on proposals relating to the Budget and Policy Framework must contain details of the nature and extent of community engagement or consultation with stakeholders, Overview and Scrutiny Committee and the outcome of that consultation. Reports about other matters will set out the details and outcome of consultation as appropriate. The level of community engagement or consultation required will be appropriate to the nature of the matter under consideration having due regard to the Council's Community Engagement Strategy.

2.5 Who can put Items on the Executive Agenda?

The Mayor and Chief Executive may put on the agenda of any Cabinet meeting any Executive matter which s/he wishes, whether or not authority has been delegated to the Cabinet, a Committee of it, any Member, the Chief Executive, a Chief Officer or

officer in respect of that matter. The Corporate Director, Law, Probity and Governance will comply with their requests in this respect.

The Monitoring Officer and/or the Chief Finance Officer may include an item for consideration on the agenda of a Cabinet meeting and may require the Chief Executive to call such a meeting in pursuance of their statutory duties. In other circumstances, where any two (2) of the Head of Paid Service, Chief Finance Officer and Monitoring Officer are of the opinion that a meeting of the Cabinet needs to be called to consider a matter that requires a decision, they may jointly call a meeting and include an item on the agenda of that meeting or of a Cabinet meeting which has already been called. If there is no meeting of the Cabinet soon enough to deal with the issue in question, then the person(s) entitled to include an item on the agenda may also require that a meeting be convened at which the matter will be considered.

2.6 Application of Council Procedure Rules

Rules 9, 10, 17.1 to 17.3 and 18 to 25 of the Council Procedure Rules (Part 4.1 of this Constitution) shall also apply to meetings of the Cabinet.

2.7 Public Engagement at Cabinet

Whilst the main focus of Cabinet is as a decision-making body, there is an opportunity for the public to contribute through making submissions that specifically relate to the reports that are set out on the agenda. Members of the public may therefore make written submissions in any form (for example; Petitions, letters, written questions) and which to be submitted to the Clerk to Cabinet (whose details are on the agenda front sheet) by 5 pm the day before the meeting. The consideration of such written submissions will be at the discretion of whosoever presides at the meeting.

3. THE MAYOR'S EXECUTIVE SCHEME OF DELEGATION

With effect from xxxxxxxx

PART A - EXECUTIVE SCHEME OF DELEGATION

1. PURPOSE

1.1 The purpose of this Executive Scheme of Delegation is to:-

- (a) be clear about who can make which executive decisions including Key Decisions;
- (b) facilitate the smooth running of Council business;
- (c) ensure that the Mayor is able to provide effective strategic leadership for the overall policy direction of the Council and to promote partnership working with other agencies; and that officers take responsibility for operational matters and policy implementation.

2. THE CONSTITUTION

2.1 Once presented by the Mayor to the Annual Council Meeting or to the Monitoring Officer, this Executive Scheme of Delegation will form part of the Council's Constitution and will be appended to it. Its provisions apply alongside the Council Procedure Rules (Part 4.1) and Access to Information Procedure Rules (Part 4.2) provisions included in the Constitution.

3. AMENDMENTS TO THE EXECUTIVE SCHEME OF DELEGATION

3.1 This Scheme of Delegation remains in force for the term of office of the Mayor unless and until it is amended or revoked by the Mayor in accordance with Rule 1.2 of the Executive Procedure Rules.

4. NON-EXECUTIVE DECISIONS

4.1 No delegated power in this Executive Scheme of Delegation applies to any decision that relates to a matter that is not an Executive function either by law or by the allocation of local choice functions under the Council's Constitution.

5. THE COMPOSITION OF THE EXECUTIVE

5.1 The Executive shall consist of ten (10) people, namely the Mayor and nine (9) Councillors as set out below:-

Name	Portfolio
Mayor John Biggs	Executive Mayor Specific responsibility for Partnerships, Policy, Strategy & Performance
Councillor Sirajul Islam	Statutory Deputy Mayor and Cabinet Member for Housing Management & Performance Deputy Mayor Responsible also for - Work with Faith Communities - Welfare Reform Response
Councillor Rachel Saunders	Deputy Mayor for Education & Children's Services & the Third Sector Cabinet Member for Education and Children's Services Deputy Mayor Responsible also for - Grants & Third Sector
Councillor Shiria Khatun	Deputy Mayor for Community Affairs Cabinet Member for Community Safety Deputy Mayor Responsible also for - Community Cohesion - Tackling Radicalisation
Councillor Rachael Blake	Cabinet Member for Strategic Development
Councillor Joshua Peck	Cabinet Member for Work & Economic Growth
Councillor Amy Whitelock Gibbs	Cabinet Member for Health and Adult Services
Councillor Asma Begum	Cabinet Member for Culture
Councillor Ayas Miah	Cabinet Member for Environment
Councillor Josh Peck	Cabinet Member for resources

6. DELEGATIONS TO THE EXECUTIVE

6.1 The Mayor has not delegated any decision-making powers to the Executive acting collectively.

6.2 The Mayor may, in accordance with Rule 1.2 of the Executive Procedure Rules, appoint such committees of the Executive as he considers appropriate from time to time and he appoints the following at this time:

- King George's Fields Charity Board
- The Grants Determination Sub-Committee

6.3 Subject to the Mayor's prerogative to make decisions on all matters relating to all his statutory powers, the Mayor delegates to each Cabinet Member individually the power to make decisions on matters within their portfolio after consultation with the Mayor and subject to the Mayor raising no objection to the proposed decision. Any such decision by a cabinet member will be subject to a written report and the same procedure as applies to mayoral executive decisions.

6.4 In accordance with section 14(6) of the Local Government Act 2000 (as amended), any arrangements made by the Mayor for the discharge of an executive function by an executive member, committee or officer are not to prevent the Mayor from exercising that function.

7. DELEGATIONS TO OFFICERS

7.1 The Mayor has delegated to officers decision making powers in relation to Executive functions as set out at Parts 3 and 8 of the Council's Constitution.

8. OTHER DELEGATIONS

8.1 The Mayor has not delegated any powers to any area committee, or to any ward Councillor in accordance with section 236 of the Local Government and Public Involvement in Health Act 2007.

8.2 The Mayor has delegated powers to joint arrangements with other local authorities as set out in Part 2, Article 11 and Part 3.3.22 of the Council's Constitution

8.3 Subject to paragraph 8.2 above, the Mayor has not delegated any powers to any other local authority.

**PART B - PROCESS FOR EXECUTIVE DECISION MAKING
BY THE MAYOR OR A CABINET MEMBER**

1. Where an Executive decision, including a Key Decision, falls to be made and either:-
 - (a) authority to make that decision has not been delegated by the Mayor under this Executive Scheme of Delegation; or
 - (b) authority has been delegated but the person or body with delegated powers declines to exercise those powers; or
 - (c) authority has been delegated but the Mayor nevertheless decides to take the decision himself,

the decision shall be made by the Mayor individually, after consultation with the Monitoring Officer, the Chief Finance Officer and such other Corporate Director(s), the Head of Paid Service or Cabinet Member(s) as required.
2. Executive decisions (including Key Decisions) to be taken by the Mayor in accordance with paragraph 1 above shall either be taken:-
 - (a) at a formal meeting of the Executive, notice of which has been given in accordance with the Executive Procedure Rules (Part 4.4) of the Constitution and to which the Access to Information Rules (Part 4.2) of the Constitution shall apply; or
 - (b) in accordance with the procedure at paragraph 5 below.
3. In the case of a decision taken at a formal meeting of the Executive, the Mayor will take the decision having received written and oral advice from appropriate officers and consulted those members of the Executive present. In the event that a meeting of the Executive is not quorate, the Mayor may still take any necessary decisions having consulted any Executive members present. All Mayoral decisions taken at a formal meeting of the Executive shall be recorded in the minutes of the meeting.
4. The Cabinet Meeting is not authorised to exercise the Mayor's powers in the absence of the Mayor. If the Mayor is unable to act for any reason, and only in those circumstances, the Deputy Mayor is authorised to exercise the Mayor's powers.
5. The Mayor may at his discretion make a decision in relation to an Executive function, including a Key Decision, alone and outside the context of a meeting of the Executive. In relation to any decision made by the Mayor under this provision:-
 - (a) The decision may only be made following consideration by the Mayor of a full report by the relevant officer(s) containing all relevant information, options and recommendations in the same format as would be required if the decision were to be taken at a meeting of the Executive;

- (b) The provisions of the Overview and Scrutiny Procedure Rules in relation to call-in, including the rules regarding urgent decisions, shall apply;
- (c) In the case of a Key Decision as defined in Part 2, Article 13 of the Constitution, the provisions of the Access to Information Procedure Rules in relation to prior publication on the Forward Plan shall apply; and
- (d) The decision shall not be made until the Mayor has confirmed his agreement by signing a Mayoral Decision Proforma (example attached) which has first been completed with all relevant information and signed by the relevant Chief Officers.


6. All Mayoral decisions taken in accordance with paragraph 5 above shall be:-

- (a) Recorded in a log held by the Democratic Services Manager and available for public inspection; and
- (b) Published on the Council's website;

save that no information that in the opinion of the Corporate Director, Law, Probity and Governance is 'exempt' or 'confidential' as defined in the Council's Access to Information Procedure Rules (Part 4.2) shall be published, included in the decision notice or available for public inspection.

7. Any decision taken by an individual Cabinet Member in relation to any matter delegated to him/her in accordance with paragraph 6 of the Mayor's Executive Scheme of Delegation shall:-

- (a) be subject to the same process and rules as a Mayoral decision in accordance with paragraphs 5 and 6 above; and
- (b) not be made until the Mayor has confirmed in writing that he has no objection to the decision.

Individual Mayoral Decision Proforma Decision Log No: (To be inserted by Democratic Services)	 TOWER HAMLETS
Report of: [Insert name and title of corporate director]	Classification: [Unrestricted or Exempt]
[Insert title here]	

Is this a Key Decision?	Yes / No (Report author to delete as applicable)
Decision Notice Publication Date:	(Report author to state date of decision notice – either individual notice or within the Forward Plan)
General Exception or Urgency Notice published?	Yes (give details) / Not required (Report author to delete as applicable)
Restrictions:	(If restricted state which of the exempt/confidential criteria applies)

EXECUTIVE SUMMARY

(To be completed by Chief Officer seeking the decision)

.....

Full details of the decision sought, including reasons for the recommendations and (where applicable) each of the options put forward; other options considered; background information; the comments of the Chief Finance Officer; the concurrent report of the Corporate Director, Law, Probity and Governance; implications for One Tower Hamlets; Risk Assessment; Background Documents; and other relevant matters are set out in the attached report.

DECISION

(Proposed decision to be entered here)

.....

APPROVALS

1. (If applicable) Corporate Director proposing the decision or his/her deputy

I approve the attached report and proposed decision above for submission to the Mayor.

Signed Date

2. Chief Finance Officer or his/her deputy

I have been consulted on the content of the attached report which includes my comments.

Signed Date

3. Monitoring Officer or his/her deputy

I have been consulted on the content of the attached report which includes my comments.

(For Key Decision only – delete as applicable)

I confirm that this decision:-

- (a) has been published in advance on the Council’s Forward Plan OR
- (b) is urgent and subject to the ‘General Exception’ or ‘Special Urgency’ provision at paragraph 18 or 19 respectively of the Access to Information Procedure Rules.

Signed Date

4. (If the proposed decision relates to matters for which the Head of Paid Service has responsibility) Head of Paid Service

I have been consulted on the content of the attached report which includes my comments where necessary.

Signed Date

5. Mayor

I agree the decision proposed at above for the reasons set out in paragraph of the attached report.

Signed Date

APPENDIX 2

3.4 THE EXECUTIVE

3.4.1 Cabinet

Membership: The Mayor and at least two (2) and not more than nine (9) other Executive Councillors appointed by the Mayor.	
Functions	<u>Delegation of Functions</u>
1. To discharge all functions not specified as the responsibility of the full Council or of any other Committee, where the Mayor has delegated his powers to the Cabinet as set out in the Executive Scheme of Delegation.	Chief Officers and other officers authorised by them have the delegated authority as set out in paragraph 3.2 above and 3.5 below.
2. In relation to any Executive function for which the Mayor has not delegated his powers to the Cabinet, to advise the Mayor on the discharge of that function.	No delegations
3. To refer to the Standards Advisory Committee for consideration any report which contains implications for the Council's ethical framework	No delegations
Quorum: Three (3) Members of the Cabinet	

The Cabinet may establish Sub-Committees to discharge functions on its behalf but any Cabinet Sub-Committee may only include Cabinet Members.

3.4.2 King George's Fields Charity Board

Membership: All Members of the Cabinet	
Functions	Delegation of Functions
1. To administer the affairs of the King George's Field, Mile End charity, registered number 1077859 and the King George's Field – Stepney (Tredegar Square, Bow) charity, registered number 1088999 and discharge all duties of the Council as sole trustee of these charities.	No delegations
2. To administer the affairs and discharge the duties of trustee of such other charities controlled by the Council as the Executive might authorise.	No delegations
Quorum: Three (3) Members of the Board	

3.4.3 Grants Determination Sub-Committee

Membership: The Mayor plus two (2) other Executive Councillors as appointed by the Mayor or their nominees who must also be Executive Councillors	
Functions	Delegation of Functions
1. To determine all applications for grant funding received by the Council.	No delegations
2. To determine all applications for corporate match funding received by the Council.	No delegations
3. The Sub-Committee may delegate decision making to individual officers, provided that the extent of this delegation is made clear and that it is minuted properly	No delegations
4. Where decision making has been delegated, to receive a report advising as to the exercise of a discretion at the next Sub-Committee meeting following the exercise of such discretion.	No delegations
5. To receive quarterly update reports against defined parameters in order for the Council to demonstrate either: that delivery is in line with the application and, therefore, the grant achieved its purpose; or to provide clear delineation where outcomes were not achieved and the reasons for such failure are apparent. Such Monitoring should therefore include measuring performance against the expected outcomes.	No delegations
6. To determine criteria under which grant applications will be considered.	No delegations
Quorum: Three (3) Members of the Committee	

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