

CABINET

MAYOR

Mayor John Biggs

CABINET MEMBERS

Councillor Sirajul Islam	(Statutory Deputy Mayor and Cabinet Member for Housing Management & Performance)
Councillor Shiria Khatun	(Deputy Mayor and Cabinet Member for Community Safety)
Councillor Rachael Saunders	(Deputy Mayor and Cabinet Member for Education & Children's Services)
Councillor Rachel Blake	(Cabinet Member for Strategic Development)
Councillor Asma Begum	(Cabinet Member for Culture)
Councillor David Edgar	(Cabinet Member for Resources)
Councillor Ayas Miah	(Cabinet Member for Environment)
Councillor Joshua Peck	(Cabinet Member for Work & Economic Growth)
Councillor Amy Whitelock Gibbs	(Cabinet Member for Health & Adult Services)

[The quorum for Cabinet is 3 Members]

MEETING DETAILS

Tuesday, 1 November 2016 at 5.30 p.m.
C1, 1st Floor, Town Hall, Mulberry Place, 5 Clove Crescent, London, E14 2BG

The meeting is open to the public to attend.

Further Information

The public are welcome to attend meetings of the Cabinet. Procedures relating to Public Engagement are set out in the 'Guide to Cabinet' attached to this agenda.

Contact for further enquiries:

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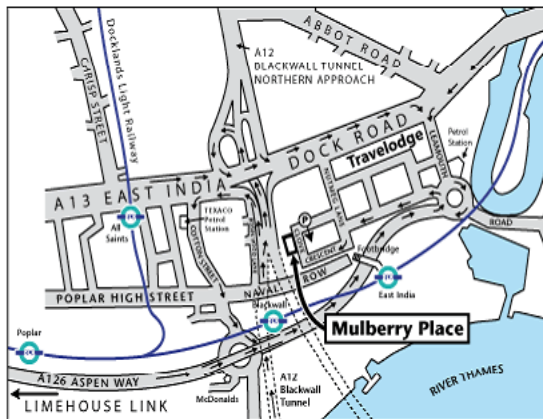
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A Guide to CABINET

Decision Making at Tower Hamlets

As Tower Hamlets operates the Directly Elected Mayor system, **Mayor John Biggs** holds Executive powers and takes decisions at Cabinet or through Individual Mayoral Decisions. The Mayor has appointed nine Councillors to advise and support him and they, with him, form the Cabinet. Their details are set out on the front of the agenda.

Which decisions are taken by Cabinet?

Executive decisions are all decisions that aren't specifically reserved for other bodies (such as Development or Licensing Committees). In particular, Executive Key Decisions are taken by the Mayor either at Cabinet or as Individual Mayoral Decisions.

The constitution describes Key Decisions as an executive decision which is likely

- a) to result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the local authority's budget for the service or function to which the decision relates; or
- b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards in the borough.

Upcoming Key Decisions are published on the website on the 'Forthcoming Decisions' page through www.towerhamlets.gov.uk/committee

Published Decisions and Call-Ins

Once the meeting decisions have been published, any 5 Councillors may submit a Call-In to the Service Head, Democratic Services requesting that a decision be reviewed. This halts the decision until it has been reconsidered.

- The decisions will be published on: **Thursday, 3 November 2016**
- The deadline for call-ins is: **Tuesday, 8 November 2016**

Any Call-Ins will be considered at the next meeting of the Overview and Scrutiny Committee. The Committee can reject the call-in or they can agree it and refer the decision back to the Mayor, with their recommendations, for his final consideration.

Public Engagement at Cabinet

The main focus of Cabinet is as a decision-making body. However there is an opportunity for the public to contribute through making submissions that specifically relate to the reports set out on the agenda.

Members of the public may make written submissions in any form (for example; Petitions, letters, written questions) to the Clerk to Cabinet (details on the front page) by 5 pm the day before the meeting.

LONDON BOROUGH OF TOWER HAMLETS

CABINET

TUESDAY, 1 NOVEMBER 2016

5.30 p.m.

	Pages
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. UNRESTRICTED MINUTES	5 - 18
The unrestricted minutes of the Cabinet meeting held on Tuesday 4 October 2016 are presented for approval.	
4. OVERVIEW & SCRUTINY COMMITTEE	
4.1 Chair's Advice of Key Issues or Questions	
Chair of Overview and Scrutiny Committee (OSC) to report on any issues raised by the OSC in relation to unrestricted business to be considered.	
4.2 Any Unrestricted Decisions "Called in" by the Overview & Scrutiny Committee	
(Under provisions of Article 6 Para 6.02 V of the Constitution).	

5. UNRESTRICTED REPORTS FOR CONSIDERATION

5 .1	Tower Hamlets Safeguarding Children Board Annual Report 2015-16	19 - 106
<p>Report Summary: This report is presented for noting purposes in order to meet statutory requirements of the Children Action 2004 and DfE Working Together to Safeguard Children Guidance 2015.</p> <p>Wards: All Wards Lead Member: Deputy Mayor and Cabinet Member for Education and Children's Services Corporate Priority: A Healthy and Supportive Community</p>		
5 .2	Tower Hamlets Safeguarding Adults Board annual report 2015-16	107 - 188
<p>Report Summary: This report is presented for noting purposes in order to meet statutory requirements of the Care Act 2014.</p> <p>Wards: All Wards Lead Member: Cabinet Member for Health and Adult Services Corporate Priority: A Healthy and Supportive Community</p>		
5 .3	Housing Strategy 2016 - 2021	189 - 384
<p>Report Summary: To approve the draft Housing Strategy and associated appendices for consideration for adoption by full Council.</p> <p>Wards: All Wards Lead Member: Cabinet Member for Strategic Development, Deputy Mayor and Cabinet Member for Housing Management and Performance Corporate Priority: A Great Place to Live</p>		
5 .4	Common Housing Register Allocation Scheme	385 - 458
<p>Report Summary: Approval of amendments to the Common Housing Register Allocation Scheme and agreement of the 2016/17 and 17/18 Lettings Plan.</p> <p>Wards: All Wards Lead Member: Deputy Mayor and Cabinet Member for Housing Management and Performance Corporate Priority: A Great Place to Live</p>		

5 .5	Our Borough, Our Plan: A New Local Plan Consultation Document (Regulation 18)	459 - 472
<p>Report Summary: Cabinet are asked to:</p> <ul style="list-style-type: none"> • Support the progress of “Our Borough, Our Plan: A New Local Plan Consultation Document (Regulation 18)” to CAB on 1 November and the for approval for public consultation from 11 November to 2 January 2017; • Support the publication of supplementary information, including draft evidence base studies (as listed in paragraph 3.17 of the MAB report) on the Council’s website alongside “Our Borough, Our Plan: A New Local Plan Consultation Document (Regulation 18)”; and <p>Please note that Appendices for this report are contained in two separate Supplementary Packs.</p> <p>Wards: All Wards Lead Member: Cabinet Member for Strategic Development Corporate Priority: A Great Place to Live</p>		

5 .6	Community Buildings Report	473 - 540
<p>Report Summary: To consider a report setting out the findings of the community buildings review, as per the Cabinet decision of December 2015</p> <p>Wards: All Wards Lead Member: Cabinet Member for Resources Corporate Priority: One Tower Hamlets</p>		

5 .7	Somali Task Force	541 - 596
<p>Report Summary: Requested to note the content and approve the recommendations of the Somali Task Force project.</p> <p>This report details the findings of the Somali Task Force on the challenges facing the Somali community and outlines the recommendations and action plan that has been produced to improve the issues identified.</p> <p>Wards: All Wards Lead Member: Deputy Mayor and Cabinet Member for Housing Management and Performance Corporate Priority: A Fair and Prosperous Community; A Great Place to Live</p>		

Report Summary:

To agree that the Fish Island Controlled Parking Zone becomes permanent following the experimental period.

Wards: Bow East

Lead Member: Cabinet Member for Environment

Corporate Priority: A Great Place to Live

6. ANY OTHER UNRESTRICTED BUSINESS CONSIDERED TO BE URGENT**7. EXCLUSION OF THE PRESS AND PUBLIC**

Nil items.

8. EXEMPT / CONFIDENTIAL MINUTES

Nil items.

9. OVERVIEW & SCRUTINY COMMITTEE**9.1 Chair's Advice of Key Issues or Questions in Relation to Exempt / Confidential Business**

Chair of Overview and Scrutiny Committee (OSC) to report on any issues raised by the OSC in relation to exempt/confidential business to be considered.

9.2 Any Exempt / Confidential Decisions "Called in" by the Overview & Scrutiny Committee

(Under provisions of Article 6 Para 6.02 V of the Constitution).

10. EXEMPT / CONFIDENTIAL REPORTS FOR CONSIDERATION**11. ANY OTHER EXEMPT/ CONFIDENTIAL BUSINESS CONSIDERED TO BE URGENT**

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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, Director, Law, Probity and Governance. Tel 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 CABINET

HELD AT 2.04 P.M. ON TUESDAY, 4 OCTOBER 2016

C1, 1ST FLOOR, TOWN HALL, MULBERRY PLACE, 5 CLOVE CRESCENT,
LONDON, E14 2BG

Members Present:

Mayor John Biggs	
Councillor Sirajul Islam	(Statutory Deputy Mayor and Cabinet Member for Housing Management & Performance)
Councillor Shiria Khatun	(Deputy Mayor and Cabinet Member for Community Safety)
Councillor Rachel Blake	(Cabinet Member for Strategic Development)
Councillor Asma Begum	(Cabinet Member for Culture)
Councillor David Edgar	(Cabinet Member for Resources)
Councillor Ayas Miah	(Cabinet Member for Environment)
Councillor Amy Whitelock Gibbs	(Cabinet Member for Health & Adult Services)

Other Councillors Present:

Councillor John Pierce

Apologies:

Councillor Rachael Saunders	(Deputy Mayor and Cabinet Member for Education & Children's Services)
Councillor Joshua Peck	(Cabinet Member for Work & Economic Growth)

Officers Present:

Zena Cooke	(Corporate Director, Resources)
Aman Dalvi	(Corporate Director, Development & Renewal)
Shazia Ghani	Head of Community Safety
Shazia Hussain	(Service Head Culture, Learning and Leisure, Communities Localities & Culture)
Christine McInnes	(Service Head, Education and Partnerships, Children's Services)
Denise Radley	(Director of Adults' Services)
Layla Richards	(Service Manager, Policy Programmes and Community Insight)
Dean RiddickMcGregor	(Political Adviser to the Labour Group)
Peter Robbins	Head of Mayor's office
Graham White	(Interim Service Head, Legal Services, Law, Probity and Governance)
Andreas Christophorou	(Service Head, Communications & Marketing)
Afazul Hoque	Interim Service Manager, Strategy, Policy &

Kelly Powell
Matthew Mannion

Performance
(Acting Deputy Service Head of Communications)
(Committee Services Manager, Democratic
Services, Law, Probity and Governance)

1. APOLOGIES FOR ABSENCE

Apologies for absence were received on behalf of:

- Councillor Rachael Saunders, Deputy Mayor and Cabinet Member for Education and Children's Services
- Councillor Joshua Peck, Cabinet Member for Work and Economic Development
- Will Tuckley (Chief Executive)
- Debbie Jones (Corporate Director, Children's Services) for whom Christine McInnes (Service Head Education and Partnership) was deputising.
- Roy Ormsby (Service Head, Public Realm)

2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS

There were no Declarations of Disclosable Pecuniary Interests.

3. UNRESTRICTED MINUTES

RESOLVED

1. That the unrestricted minutes of the Cabinet meeting held on Tuesday 6 September 2016 be approved and signed by the Chair as a correct record of proceedings.

4. OVERVIEW & SCRUTINY COMMITTEE

4.1 Chair's Advice of Key Issues or Questions

Pre-Decision Scrutiny Questions were received in relation to Agenda Items 5.3 (Waste Management Services – Contract Extension) and 5.9 (Contracts Forward Plan – Quarter 3). These were responded to during consideration of the respective items.

In addition, Councillor John Pierce, Chair of the Overview and Scrutiny Committee (OSC) provided an update on the OSC meeting the previous week. He explained that the Committee had examined a number of reports and issues including:

- The Strategic Monitoring Report (Q1) – with issues ranging from staff sickness through to affordable housing discussed.
- Corporate Budget Monitoring – especially in respect of required savings targets.
- Community Safety – including hearing from the Police Borough Commander and examining the Community Safety Partnership.

- Gambling Policy – with a focus on issues around Fixed Odds Betting Terminals.
- The Council's responsibilities around safeguarding vulnerable residents.

He also reported that the Committee had developed an OSC Toolkit to help Members and officers fully understand the role of OSC and how to engage it in decision making and policy development and review.

The **Mayor** thanked Councillor John Pierce for his update.

4.2 Any Unrestricted Decisions "Called in" by the Overview & Scrutiny Committee

Nil items.

5. UNRESTRICTED REPORTS FOR CONSIDERATION

5.1 The Infrastructure Delivery Framework: Governance Proposals

Councillor Rachel Blake, Cabinet Member for Strategic Development, introduced the report. She explained that the report set out the new, transparent, process for allocating S106 and CIL funds. She highlighted the information contained in the Appendices including decision flowcharts, guidelines for identifying projects and the relationship with the Council's Commissioners.

The **Mayor** welcomed the report and the transparency it brought to the decision making process. He highlighted the need to balance spending on projects in direct proximity to a development against dealing with the wider impact on the Borough as a whole. He noted the delegation to officers of spending below £250k but highlighted that he still expected to be kept informed of those decisions. He **agreed** the recommendations as set out in the report.

RESOLVED

1. To approve the proposed timetable for reporting CIL and S106 income, allocation and expenditure information. It is proposed that quarterly reports will be provided on to Cabinet. Reporting to the Overview and Scrutiny Committee will be undertaken on an annual basis.
2. To note the latest positions regarding the Council's CIL and S106 income and expenditure information.

3. To agree that the Infrastructure Delivery Steering Group can recommend to the Corporate Director of Development and Renewal (or equivalent) the sign off of a 'Record of Corporate Director's Actions' form authorising the allocation of CIL and S106 as in I. and II. below:
 - I. The allocation of CIL and S106 funding of up to £250,000 to infrastructure projects ;
 - II. The allocation of S106 income where contributions are due to expire imminently;
4. For all approvals granted in accordance with recommendation 3 above, to approve the implementation of a process to allow the Mayor to review the decision made.
5. To approve the proposed approach to engaging with the Commissioners where decisions sought involve the provision of grants.
6. To approve the proposal to integrate the process for completing 'Records of Corporate Director's Actions' forms into the IDF approval process.
7. To approve the proposal to integrate the adoption of Capital budgets of up to £1 million by the Mayor in Cabinet into the IDF approval process.
8. To approve the proposal to integrate the adoption of Capital budgets of over £1 million by Full Council into the IDF approval process. This does not apply in the case of the adoption of Capital budgets through the Council's annual budget-setting process.
9. To note and approve the proposed approach to approving the funding and delivery of infrastructure projects through the IDF approval process.
10. To approve the proposals for enabling the identification of new infrastructure projects by the Mayor and Councillors who attend the Infrastructure Delivery Board. Approve the process proposed that will enable officers to seek initial views on infrastructure projects from the Infrastructure Delivery Board.
11. To approve the Terms of Reference, along with any proposed amendments, for the Infrastructure Delivery Steering Group; and the Terms of reference for the Infrastructure Delivery Board. These documents will reflect the decisions made in respect of this report.
12. To note that proposals for the Local Infrastructure Fund are currently proposed to follow to the next Cabinet meeting. The Local infrastructure fund will enable localities to more directly inform

spending decisions in respect of a proportion of CIL income collected.

5.2 Approval of the allocation of S106 Funding to projects including Pocket Parks: Cabinet Report

Councillor Rachel Blake, Cabinet Member for Strategic Development, introduced the report proposing a number of projects to receive S106 and CIL funding. Individual Cabinet Members then briefly introduced the projects that related to their areas of responsibility.

There followed a brief discussion about the projects noting a number of points including that:

- It was important to work with the CCG to ensure the right sort of investment in health infrastructure. In particular it was noted that the Council was doing well in developing new health centres.
- In relation to the Chicksand East pocket park, Tower Hamlets Homes did not expect a significant impact on service costs or charges.
- Designing out crime was a key factor in developing the pocket parks and officers were also looking to ensure communities were involved in the developments as that helped encourage self-policing.

The **Mayor** thanked officers for their work in preparing the proposals and he **agreed** the recommendations as set out.

RESOLVED

1. To approve the capital allocation of £3,780,580.42 S106 and CIL funding to the projects set out in Table 1 of the report and profiled in the Project Initiation Documents attached at Appendices A to E and as set out below:
 - a) Idea Store Interactive Learning Project: **£232,342**
 - b) Mile End Pavilion Air Conditioning: **£30,000**
 - c) Idea Stores Technology Refresh: **£249,238.42**
 - d) Pocket Parks Programme: **£150,000**
 - e) Wellington Way Health Centre: **£3,119,000**
2. To approve the adoption of a capital budget in respect of the projects set out in four of the PIDs, equating to an amounts as follows:
 - a) Idea Store Interactive Learning Project: **£232,342**
 - b) Mile End Pavilion Air Conditioning: **£30,000**
 - c) Idea Stores Technology Refresh: **£249,238.42**
 - d) Pocket Parks Programme: **£150,000**
3. To approve the referral of a proposed grant allocation of £30,000 to Poplar HARCA for improvements to open space in the vicinity of the A12 Highway as part of the Pocket Parks Programme through the Commissioners' decision making process as required.

4. To approve the referral of a proposed grant allocation of £3,119,000 for the development of a new dedicated GP surgery facility at Wellington Way (including enabling works at Mile End Hospital to facilitate the relocation of the existing health facility at Wellington Way) to the Commissioners for formal confirmation whether Commissioners' approval is required and approve the allocation to proceed through the Commissioners' decision making process if required.

5.3 Waste Management Services - Contract Extension

Councillor Ayas Miah, Cabinet Member for Environment, introduced the report. He noted the Pre-Decision Scrutiny Questions and the answers tabled by officers. In respect of Member engagement it was noted that there were plans for workshops to engage with all groups when preparing the new long-term contract.

Members then discussed the report during which it was noted that the Borough needed to explore more innovative solutions to waste problems including new ways of storing, collecting and disposing of waste at many locations and especially with respect to new-build developments.

The **Mayor** noted the discussion and the particular issue around waste transfer stations. He thanked Fiona Heyland (Head of Waste Management), Roy Ormsby (Service Head, Public Realm) and their officers for their work and **agreed** the recommendations as set out.

RESOLVED

1. To approve the revised contracting timetable set out in Table 1 at paragraph 3.7 of the report.
2. To authorise the Corporate Director, Communities, Localities and Culture to complete negotiations with Veolia to extend the Refuse Collection, and Street Cleansing Contract through until 31st March 2020, and to agree and enter into (following consultation with Service Head, Legal Services) the necessary contract extension agreement.
3. To agree that the procurement of the Interim Recycling collection Contract, which will expire on 30 September 2018 (and which Cabinet approved in July 2015), be amended to allow for an optional 18 month extension period up to 31 March 2020 and authorise the Corporate Director, Communities, Localities and Culture to agree and enter into (following consultation with Service Head Legal Services) the necessary contract documentation to give effect to this.
4. To authorise the Corporate Director, Communities, Localities and Culture to complete negotiations with Veolia to extend the waste

disposal contract until 30th September 2017, and to agree and enter into (following consultation with Service Head, Legal Services), the necessary contract documentation to give effect to this.

5. To agree that the Council continues with the procurement process for a new waste disposal contract for an initial period of 9 years and 6 months with a further extension of up to 8 years and authorise the Corporate Director of Communities Localities and Culture to award the contract following consultation with the Service Head, Legal Services.
6. To authorise the Corporate Director, Development and Renewal (following consultation with the Service Head, Legal Services) to agree the terms of and enter into a new short-term excluded lease or tenancy at will for Northumberland Wharf Waste Transfer Station so that it is co-terminus with the expiry of the waste disposal contract on 30th September 2017.
7. To agree that a number of workshops are held with Members, across all parties, to redesign a future service, ensuring the Council provides best value for our residents.

5.4 Community Safety Partnership Plan 2013-16 Year 4 (2016/17)

Councillor Shiria Khatun, Deputy Mayor and Cabinet Member for Community Safety, introduced the report. She highlighted that it was a statutory duty to review the plan based on the previous years' performance.

The **Mayor** highlighted that it was an important report for dealing with crime and anti-social behaviour and that it would be having a more comprehensive revision next year. It was noted that the report would be presented to Council for approval.

The **Mayor agreed** the recommendations as set out.

RESOLVED

1. To note the content of the Community Safety Partnership Plan 2013-16 Year 4 (2016/17) included as appendix 1 to the report
2. To 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. To 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.

5.5 Violence Against Women & Girls Strategy

Councillor Shiria Khatun, Deputy Mayor and Cabinet Member for Community Safety, introduced the report on the Violence Against Women and Girls (VAWG) Strategy. In particular she highlighted the commitment of the Council's partners in tackling VAWG and how the new strategy had been developed following analysis of the effectiveness of the previous strategy and from consultation feedback.

The **Mayor** welcomed the report making clear that it was important to change expectations and attitudes around acceptable behaviour. He also reported that he would like to make a further study into the impact of domestic violence leading to homelessness. He thanked the Lead Member and Shazia Ghani (Head of Community Safety) and **agreed** the recommendations as set out.

RESOLVED

1. To note the content of the VAWG Strategy (appendix 1 to the report).
2. To agree that the VAWG Strategy is recommended to Full Council for approval.

5.6 Gambling Policy 2016-19

Councillor Shiria Khatun, Deputy Mayor and Cabinet Member for Community Safety, introduced the report on the Gambling Policy for 2016/19. She highlighted that this was a statutory policy and would be presented to Council for final approval. The policy was generally considered fit for purpose but had received updates in relation to statutory changes.

During discussion of the report it was noted that the issue of fixed odds betting terminals was being actively considered and that Councils in London were asking the government to look at this issue again.

The **Mayor** welcomed the report and noted his support for efforts to tackle fixed odds betting terminals and also his concern on overseas based online gambling. He **agreed** the recommendation as set out.

RESOLVED

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

5.7 Food Law Enforcement Service Plan 2016/2017

Councillor Ayas Miah, Cabinet Member for Environment, introduced the Food Law Enforcement Service Plan report. He highlighted the importance of this work in ensuring residents were protected. The report looked at a number of issues such as substitution of foods and monitoring of different types of premises.

During discussion officers highlighted that they were reducing work on lower risk premises and focussing on higher risk operators. Officers also agreed to provide Members with more information on how market stalls were monitored.

The **Mayor agreed** the recommendation as set out.

RESOLVED

1. To approve the Tower Hamlets Food Law Enforcement Plan 2016/2017 and Food Sampling Policy attached at the Appendix of the report.

5.8 Academy Conversions - Mulberry School for Girls and Ian Mikardo High School

The **Mayor** presented the report on two Academy conversions of local schools. He noted the updated tabled report presented with additional financial information.

He explained that the report set out how assets were to be transferred during the process and how the school grants were dealt with. It was noted that the Council was not in favour of schools converting to Academy status but that it was a decision for the schools to make.

RESOLVED

1. To note that the land disposal for both schools is subject to the Commissioners' consent;
2. To approve that the appropriate lease arrangements should be entered into for both schools;
3. To approve the Council to enter into commercial and staffing transfers for both schools;
4. To approve the Council to enter into all other necessary documentation to ensure the liabilities under the PFI arrangements for Mulberry School for Girls are transferred to the Academy;
5. To authorise the Corporate Director Children's Services, in conjunction with both the Corporate Director Law, Probity and Governance and the Corporate Director Resources to enter into and undertake any remaining issues associated with the conversion of the two schools;

6. To authorise the Corporate Director Law, Probity and Governance to execute all documentation required to implement those decisions at 2 to 5;
7. To authorise the Section 151 Officer to execute the Local Government (Contract) Act 1997 Certificate required to implement the decisions at 2 to 5.

5.9 Contracts Forward Plan - Quarter 3 (2016-2017)

Councillor David Edgar, Cabinet Member for Resources, introduced the report. He highlighted that this was an opportunity for Cabinet Members to request specific reports on individual contracts before they were awarded. He noted the Pre-Decision Scrutiny Questions and in particular the need to ensure contracts paid the London Living Wage.

The report was discussed by the Cabinet. It was suggested that updates on the contract process for CS5124 (Young People's substance misuse and sexual health service) and AHS5111 (Generic Floating Support) should be extended to more Cabinet Members (as set out below). It was also requested that a briefing note for Cabinet Members be prepared in relation to Contract CLC5149 (Framework Agreement for Landscape and Play Installation Works). The **Mayor** agreed the above, noted there were no requests for full reports to Cabinet on any of the contracts and **agreed** the recommendations as set out below.

RESOLVED

1. To ensure that briefings on the high level specifications on contract (CS5124 Young people's substance misuse and sexual health service) be received by the Cabinet Members for Health & Adults Services, Education & Children's Services and Community Safety.
2. To ensure that briefings on the high level specifications on contract (AHS5111 Generic Floating Support) be received by the Cabinet Members for Health & Adults' Services and Housing Management & Performance.
3. That a briefing for Executive Members on contract CLC 5149 – Framework Agreement for Landscape & Play Installation Works be prepared before contract award.
4. That all other contracts be approved to proceed to contract award after tender.
5. To authorise the Service Head, Legal Services to execute all necessary contract documents in respect of the awards of contracts referred to at Recommendation 2 above.
6. To note the forward plan schedule detailed in Appendix 2.

5.10 Medium Term Financial Strategy 2017 - 2020

Councillor David Edgar, Cabinet Member for Resources, introduced the report. He highlighted the £58 million funding gap and associated savings targets. He also asked Cabinet to note the uncertainty on certain funding streams where the Council were looking to the Chancellor's Autumn Statement for more clarity.

Cabinet reviewed the report and noted the planned consultation process, in particular in respect of the Overview and Scrutiny Committee and with service users on specific savings proposals. Finally, Members also noted the potential impact of the review of Business Rates with the Council now likely to become a net donor to this fund.

The **Mayor** noted the government proposal to provide a reduced, four-year funding settlement. This would provide the Council with certainty on that funding even if the amount received was reducing. He **agreed** the recommendations as set out.

RESOLVED

1. To note the changes to the draft budget position for 2017-8;
2. To note the early indications of the financial position 2018-19 onwards, subject to the Autumn Statement and Local Government Finance Settlement;
3. To note that the financial position is subject to volatility and that developments in Government policy and their implications on MTFS planning assumptions will be monitored closely and reported back at regular intervals;
4. To agree to accept the Government's 4 year funding Settlement Offer and delegate authority to the Director of Resources to submit a request for a Four Year guarantee for Tower Hamlets together with an Efficiency Plan;
5. To agree the consultation approach set out in section 3.20 and appendix 5 to the report;
6. To agree to commence formal budget consultation with residents, businesses and other key stakeholders and to receive feedback on the consultation at Cabinet in December.

5.11 Corporate Budget Monitoring - Month 4 (Q1 2016/17)

Councillor David Edgar, Cabinet Member for Resources, introduced the report. He highlighted the value in using the report to review how different services were managing under the growing budgetary pressures. He noted underspending on Capital budgets that he would monitor.

During discussion it was noted that there were still some savings to find, for example in Adults' Services and that some reserves may need to be used. Upcoming government announcements may also have an effect, for example on housing policy and this would be kept under review.

The **Mayor agreed** the recommendations as set out.

RESOLVED

1. To note the Council's revenue and capital financial forecast outturn position as detailed in Sections 3 to 7 of the report.
2. To note the balance sheet information in section 8 of the report.

5.12 Strategic Performance Monitoring - Q1 2016/17

The **Mayor** introduced the Strategic Performance Monitoring Report. He noted that it had been scrutinised at the recent Overview and Scrutiny Committee meeting where a number of challenging targets were noted and there was a particular discussion on staff sickness levels.

During discussion Members asked for more information around adoption & fostering and homeless households indicators. Officers explained that adjustments to the thresholds on taking children into care had impacted on the fostering and adoption numbers but that this was likely to settle down again.

The **Mayor agreed** the recommendation as set out.

RESOLVED

1. To note progress in delivering the strategic measures at the quarter 1 stage (appendix 1 to the report) and final outturns and commentary for 2015/16 (appendix 2 to the report);

5.13 Transparency Commission Action Plan and Transparency Protocol

The **Mayor** introduced the report. He welcomed it and indicated he was happy to accept the recommendations as set out.

Councillor John Pierce, Chair of the Overview and Scrutiny Committee (OSC), addressed Cabinet. He explained that OSC had reviewed the report and welcomed the actions taken in response to the original recommendations. A key target over the next period was to advance the work on becoming an Open Data Champion and in particular ensuring data was accessible.

The **Mayor** agreed the recommendations as set out.

RESOLVED

1. To note the progress in delivering the actions set out in the Mayor's Transparency Protocol (Appendix A to the report);
2. To approve the actions in response to the Transparency Commission's recommendations (Appendix B to the report).

5.14 Corporate Directors' Decisions

The **Mayor** introduced the report and **agreed** the recommendation as set out.

RESOLVED

1. To note the Corporate Directors' decision set out in Appendix 1 to the report.

5.15 List of Executive Mayoral Decisions

The **Mayor** introduced the report and **agreed** the recommendation as set out.

RESOLVED

1. To note the Individual Mayoral Decisions set out in Appendix 1 to the report.

6. ANY OTHER UNRESTRICTED BUSINESS CONSIDERED TO BE URGENT

Nil Items.

7. EXCLUSION OF THE PRESS AND PUBLIC

Nil items.

8. EXEMPT / CONFIDENTIAL MINUTES

Nil items.

9. OVERVIEW & SCRUTINY COMMITTEE

9.1 Chair's Advice of Key Issues or Questions in Relation to Exempt / Confidential Business

Nil items.

9.2 Any Exempt / Confidential Decisions "Called in" by the Overview & Scrutiny Committee


Nil items.

10. ANY OTHER EXEMPT/ CONFIDENTIAL BUSINESS CONSIDERED TO BE URGENT

Nil items.

The meeting ended at 3.41 p.m.

MAYOR JOHN BIGGS

<p>Cabinet</p> <p>1 November 2016</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Debbie Jones, Corporate Director Children's Services</p>	<p>Classification: Unrestricted</p>
<p>Safeguarding Children Board Annual Report 2015/16</p>	

Lead Member	Councillor Rachael Saunders, Deputy Mayor and Cabinet Member for Education and Children's Services
Originating Officer(s)	Monawara Bakht, Children's Safeguarding Strategy and Governance Manager
Wards affected	All wards
Key Decision?	No
Community Plan Theme	A Safe and Cohesive Community

Executive Summary

This report and its appendix set out the annual report of Tower Hamlets Safeguarding Children Board, which is a statutory requirement under the Children Act 2004 and Working Together to Safeguard Children Guidance 2015. It sets out the Board's view of the quality and effectiveness of safeguarding in Tower Hamlets, progress it has made in the last year, and its priorities for the years ahead.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the annual report from the Local Safeguarding Children Board for 2015/16.

1. REASONS FOR THE DECISIONS

- 1.1 The Local Safeguarding Children Board (LSCB) is required to publish an annual report on the effectiveness of child safeguarding arrangements and promoting the welfare of children its locality and ensure the annual report is available within the professional and public domain. The LSCB annual report, which fulfils this responsibility, is appended to this paper.

2. ALTERNATIVE OPTIONS

- 2.1 There are no alternative options, as it is a statutory requirement for this report to be reported to the Mayor.

3. DETAILS OF REPORT

- 3.1 The LSCB annual report sets out the context for safeguarding children in Tower Hamlets gives an overview of the progress against its priorities and board objectives, and an assessment of the quality if safeguarding activity in the local area.
- 3.2 The most significant area of work undertaken by the LSCB in the past year has focused on early help and intervention as an overarching theme. This is reflected in some of the board and partner activities such as child sexual exploitation; work with the local faith and minority community and safeguarding arrangements for high risk young people. Three areas to highlight are detailed below:
- Improvements have been made to the early identification and multi-agency response at the front-door to young people at risk or victims of child sexual exploitation. The police lead for child sexual exploitation and missing children is now embedded in the multi-agency safeguarding hub. This has led to improved coordination with children's social care and children better protected in a timely manner. There is emerging evidence of the impact of the improvements made in identification, disruption and prosecutions of child sexual exploitation cases.
 - Through new DfE Innovation Funds, a team of specialist workers have been recruited to deliver preventative and reactive responses to families where there are concerns of children at risk of female genital mutilation. Community mediators and local champions have been recruited and in turn they have made a significant contribution to raising awareness with community and faith groups and school community reaching over 1000 individuals.
 - Learning from Serious Case and Thematic Reviews continues to be embedded and has led to improvements in the existing local safeguarding children arrangements. Development and implementation of a harmful sexual behaviour and child sexual abuse strategies are progressing well.

They will improve the identification, assessment, intervention and therapeutic support provisions to vulnerable children and young people. The local risk management panel has now extended its remit to include younger people (aged 10 - 17) who are assessed as high risk to themselves and others. This has increased the coordination of professional expertise and provided an opportunity for LSCB partners to work effectively when supporting families facing difficulties earlier in their child's life.

3.3 The report highlights a number of issues and challenges for the LSCB and outlines the priorities going forward:

- Priority 1 – Ensure our Early Help and Early Identification Offer is robust
- Priority 2 – Improve knowledge, practice and our multi-agency response to children and young people at risk of radicalisation and extremism
- Priority 3 – Ensure there are effective arrangements and intelligence sharing in place for victims and perpetrators of Child Sexual Exploitation, Missing Children and those at risk of serious youth violence

3.4 The LSCB overarching Business Plan will be completed during the autumn to cover the period up to March 2018. The Business Plan will pick up the issues identified in the annual report and how these will be addressed. Annual reports will in future years evaluate progress against the business plan and priority areas.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

4.1 There are no direct financial implications as a result of the recommendations in this report. However, the LSCB annual report for 2015-16 shows an overspend of £166k which has to be absorbed by the Council. Whilst there are contributions being made by some partners for 2016-17 of £78k, this will not eliminate the overspend in full and the LSCB Executive Group has therefore been tasked with considering how the overspend will be addressed for 2016-17 and future years.

5. LEGAL COMMENTS

5.1 The Council's functions in relation to children include an obligation under section 11 of the Children Act 2004 to make arrangements to ensure that its functions are discharged having regard to the need to safeguard and promote the welfare of children.

5.2 The Council has established the LSCB in accordance with its obligation under section 13 of the Children Act 2004. The LSCB carries out the following functions as prescribed in the Local Safeguarding Children Boards Regulations 2006 –

- (a) developing policies and procedures for safeguarding and promoting the welfare of children in Tower Hamlets;
- (b) communicating to persons and bodies in Tower Hamlets the need to safeguard and promote the welfare of children, raising their awareness of how this can best be done, and encouraging them to do so;
- (c) monitoring and evaluating the effectiveness of what is done by the authority and their Board partners individually and collectively to safeguard and promote the welfare of children, and advising them on ways to improve;
- (d) participating in the planning of services for children in the area of the authority; and
- (e) undertaking reviews of serious cases and advising the authority and their Board partners on lessons to be learned.

5.3 Section 14A of the Children Act 2004 requires the LSCB Chair to publish an annual report on the effectiveness of child safeguarding and promoting the welfare of children in the local area. The statutory guidance 'Working Together to Safeguard Children' published in March 2015 sets out that the annual report should be published in relation to the preceding financial year and should fit with local agencies' planning, commissioning and budget cycles. The report should be submitted to the Chief Executive, Mayor, the local police and crime commissioner and the Chair of the Health and Wellbeing Board.

5.4 The annual report should provide a rigorous and transparent assessment of the performance and effectiveness of local services. It should identify areas of weakness, the causes of those weaknesses and the action being taken to address them as well as other proposals for action. The report should include lessons from reviews undertaken within the reporting period. The appended report complies with these requirements.

6. ONE TOWER HAMLETS CONSIDERATIONS

6.1 The report sets out safeguarding issues for children in Tower Hamlets and how the LSCB partners intend to address them. This is an important aspect of ensuring that all children are appropriately safeguarded at all times and are able to achieve a good level of wellbeing.

7. BEST VALUE (BV) IMPLICATIONS

7.1 There are no Best Value implications.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

8.1 There are no implications.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 The LSCB maintains a Risk and Issues Register, capturing risks as identified by a member agency or the LSCB Independent Chair. The risks, mitigation and remedial actions are monitored by the LSCB Chair and Board members.
- 9.2 Risks causing concern are escalated by the LSCB Chair to the Chief Executive or senior officer of the relevant agency. The Chief Executive is also kept informed of the LSCB risk register through monthly one-to-one meetings with the LSCB Independent Chair.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 Safeguarding has an important interface with crime and disorder. Effective safeguarding means that children and young people will be kept safe from harm caused by crime, for example abuse and exploitation. The report sets out how the work of the LSCB links with that of the Community Safety Partnership.

11. SAFEGUARDING IMPLICATIONS

- 11.1 This report sets out a number of implications for safeguarding and how the LSCB intends to address them.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Appendix 1 - Tower Hamlets Safeguarding Children Board Annual Report 2015/16
- Appendix 2 – LSCB Infographic Leaflet

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

- NONE

Officer contact details for documents:

N/A

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Safeguarding Children Board Annual Report 2015-2016

London Borough of Tower Hamlets

Tower Hamlets
**Safeguarding
Children**
Board



Tower Hamlets Safeguarding Children Board Annual Report

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Independent LSCB Chair's Foreword



LSCB Vision:

“Tower Hamlets Safeguarding Children Board places children’s safety at the heart of commissioning and delivery of services across borough so that all children and young people, including the most vulnerable are happy, healthy, safe and can achieve their full potential”

Sarah Baker
Independent Chair
Tower Hamlets Safeguarding Children Board

Welcome to the eighth Annual report of the London Borough of Tower Hamlets Local Safeguarding Children Board (LSCB) and the fourth in my tenure as the Independent Chair.

In accordance with Working Together to Safeguard Children Guidance 2015 the LSCB is required to publish an Annual Report detailing how it has achieved its functions set out within Regulation 5 of the Local Safeguarding Children Boards Regulation 2006 under section 14 of the Children Act 2004. These are:

- Assess the effectiveness of the help being provided to children and families, including early help;
- Assess whether LSCB partners are fulfilling their statutory obligations
- Quality assure practice, including through joint audits of case files involving practitioners and identifying lessons to be learned; and
- Monitor and evaluate the effectiveness of training, including multi-agency training, to safeguard and promote the welfare of children.

Over the last year the LSCB has made some significant progress. Partner organisations have shown increasing commitment to the work of the LSCB and this has led to some significant analysis and developments, for example in our work in relation to Prevent and Child Sexual Exploitation.

Lay members have gained significant confidence in their roles over the last year and are now facilitating safeguarding sessions with parents and school governors. They provide challenge in LSCB meetings to enhance debate and discussion evidenced through their questioning of complex safeguarding concepts which in turn enhances clarity and decision making.

The LSCB meetings are well attended by members of the partnership which demonstrates a huge commitment to the work of the LSCB but also creates a challenge to ensure that all partners feel engaged and able to join in discussion and have a voice.

There have been some major leadership changes within partner organisations across Tower Hamlets including within the Local Authority, Borough Police, Barts Health NHS Trust, which will hopefully now brings some stability to the partnership and enable a strong executive to lead safeguarding for children across the partnership.

The LSCB has worked with Dr Alex Chard to further develop the learning and improvement framework and develop a more systemic approach to our thinking and application of learning. This has included a master class for the LSCB and subgroup chairs and a review of the Learning and Improvement Subgroup of the LSCB. Through applying a systemic approach to reviewing the Troubled Lives, Tragic Consequences thematic and serious case reviews we have been able to identify common themes which will inform wider learning and influence professional practice.

As LSCB chair I have made a number of challenges to the partnership and more strategically to Government, These have included challenge in respect of the appropriate level of membership to effect change. This led to some role changes and has allowed some agendas to progress. There has also been challenge regarding the performance data set both in terms of partner contributions and the quality of analysis to inform the LSCB partnership regarding safeguarding risks and issues. We are making some significant progress now which is informing the range of our quality audits. Partners have engaged in the section 11 self-assessment and have participated in scrutiny and challenge sessions with myself and the LSCB business manager to further analyse and develop agency action plans. Some areas of commonality such as safer recruitment system and processes will be addressed through the LSCB overarching business plan. We will also be auditing progress against the agency action plans in the coming year.

The LSCB has led on some key developments over the last year:

Radicalisation and Extremism (Prevent) – CSC and the borough Police have worked with SO15, the Justice System and the Home Office to make some ground breaking changes to how children at risk of radicalisation are dealt with. The work has gained national attention and is influencing the work in other LSCB areas and cited in the Wood Review as an example of good alternative multi-agency working arrangement. There has been significant work with schools and as LSCB chair has joined the Prevent team in meeting

with School Governors to ensure they have a greater understanding of their role in safeguarding vulnerable children within the context of the revised Prevent Duties (Counter Terrorism and Security Act 2015).

Child Sexual Exploitation - Our CSE review has led to some significant developments including an improved and relevant database to help enhance our knowledge of our local problem profile. This is informing our work in safeguarding children at risk of or victims or perpetrators of CSE including peer on peer abuse and children being exploited to traffic drugs and weapons outside the borough boundaries. The problem profile is helping us to understand more about the perpetrators of CSE. We have increased our direct work with families to help them recognise children at risk and resources to support them in their parenting role.

Early Help – Our learning from Serious Case reviews has given us a deeper understanding of neglect which has challenged the perception of neglect occurring only as a result of cumulative harm over time. The Jamilla SCR has influenced the development of early help services including the early help hub due to be launched in autumn. This new ‘early years front door’ will facilitate sign posting to services and information to help families manage difficulties as they arise.

The Family Well Being Model is LBTH’s framework for early identification and provision of support for those families who do not meet the threshold for Children’s Social Care. The Jamilla Serious Case Review challenged the LSCB to review thresholds to ensure they were robust and understood by the LSCB partnership.

The complexity and challenges of the priorities the partnership has faced this year has led the LSCB to review its effectiveness as a committed but large board. The requirement to make some far reaching decisions has culminated in the development of an Executive Board whose membership comprises the Local Authority (Corporate Director Children’s Services), Metropolitan Police both Borough and Child Abuse Investigation Team (CAIT), the Clinical Commissioning Group and National probation Service. The Executive has been able to drive forward some key decisions and hold partners to account more effectively. It has been interesting to note the synergy with the outcome of the Wood Review in respect of this development. Over the coming year the Executive needs to review and strengthen its relationship with other strategic partnerships boards across Tower Hamlets including the Safeguarding Adult Board, Community Safety partnership and health and Wellbeing Board to ensure all opportunities are taken to maximise joint working to safeguarding children and young people.

The LSCB faces a difficult year with the implementation of the Wood Review and faces some key Challenges through the increasing budget pressures partners are facing and the consequential impact this will have on the work of the LSCB. To provide increased insight and direction into how to manage these challenges a review of the LSCB will be undertaken in the summer. As the Independent Chair, my analysis of the work to be undertaken by the LSCB partnership for the coming year should continue to build on from the progress made in the following areas:

- In light of the serious case reviews and thematic reviews the LSCB should focus on the effectiveness of partner's early help responses to fractured families, poor parenting, abuse and neglect, understanding the underlying vulnerabilities due to abuse, loss and trauma.
- The LSCB must strengthen its engagement with the communities within Tower Hamlets. Through the Thematic Review Troubled Lives - Tragic Consequences significant insight was gained about the communities the young men lived in. The consequences of their difficult life experiences can lead to a shift from vulnerable to dangerous behaviour. We have seen this in our work with victims and perpetrators of CSE, and those at risk of radicalisation and extremist ideology
- The work undertaken around Prevent, Child Sexual Exploitation and Harmful Practices, which includes female genital mutilation, forced marriage, 'honour' based abuse must continue to reach our local faith and minority communities. The LSCB must also listen to the voice of children and young people and ensure they are a driving force influencing the direction for the year ahead.

These key areas will continue to be delivered through the identified priorities for the coming year:

Priority 1 – Ensure our Early Help and Early Identification Offer is robust

Priority 2 – Improve knowledge, practice and our multi-agency response to children and young people at risk of radicalisation and extremism

Priority 3 – Ensure there are effective arrangements and intelligence sharing in place for victims and perpetrators of Child Sexual Exploitation, Missing Children and those at risk of serious youth violence

I would like to thank all partners for their continued commitment to the LSCB and joint partnership working. The strength of the partnership provides a sound basis for safeguarding children and young people in Tower Hamlets

and should give the communities with Tower Hamlets the confidence in the work of partner agencies

Sarah Baker

A handwritten signature in black ink that reads "Sarah Baker". The signature is written in a cursive style with a period at the end.

Independent Chair - LSCB London Borough Tower Hamlets

1. Section 1 – Governance & Accountability Arrangements

Tower Hamlets Local Safeguarding Children Board was established in April 2006 in response to statutory requirements under the Children Act 2004.

Now in its ninth year, the LSCB partnership continues to provide ongoing opportunities to improve local leadership and commitment to drive the safeguarding children agenda, enhance collaborative inter-agency working, increase wider engagement and influence from the professional and local community, develop effective ways in which children are safeguarded for their long-term outcomes and promote the sharing of good practice.

The core objectives of all Local Safeguarding Children Boards (LSCBs) 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 area of the authority.
- To ensure the effectiveness of what is done by each person or body for that purpose.

The scope of LSCBs includes safeguarding and promoting the welfare of children in three broad areas of activity:

- Activity that affects all children and aims to identify and prevent maltreatment, or impairment of health or development, and ensure children are growing up in circumstances consistent with safe and effective care.
- Proactive work that aims to target particular groups.
- Responsive work to protect children who are suffering, or are likely to suffer significant harm.

The LSCB is chaired independently, in accordance with 'Working Together to Safeguarding Children.' Sarah Baker was appointed as Independent Chair in February 2014 and reports directly to the Chief Executive of the local authority.

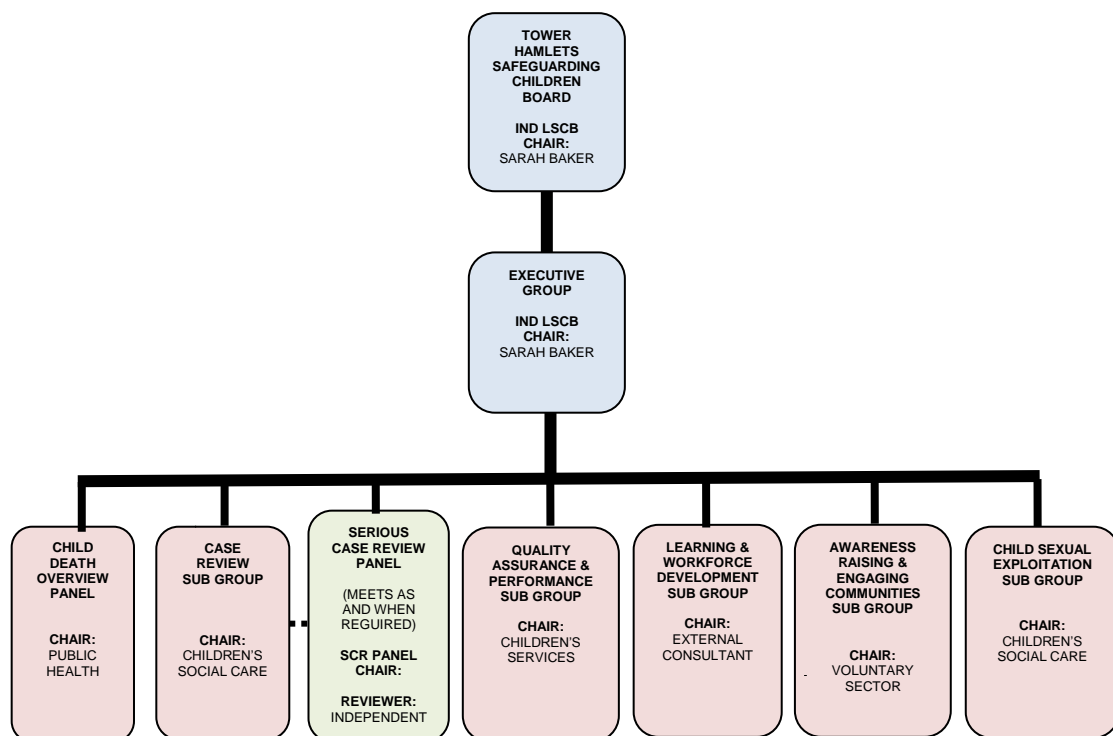
The LSCB is supported by a full-time business manager and the child death single point of contact officer. The latter is funded by Barts Health NHS Trust. Additional support is also provided by the Children's and Adults Services Resources Policy, Programmes and Community Insight function in the Council. The Chair challenges the Board partners to ensure they directly contribute to the Board's effectiveness. This is achieved through Board workshop discussions designed to facilitate wider partnership discussion.

Membership of the Board fully reflects the requirements of Working Together (2015). A full list of members is attached in **Appendix 1**. The LSCB is keenly aware of the value of including an additional independent voice during Board discussions and in the oversight of safeguarding arrangements. It achieves through the involvement of lay members.

The Board meets every two months. Attendance at the LSCB meetings has been, as always, exceptionally good. The LSCB Business Plan and Risk Register are monitored by the Chair and business manager, reporting progress back to Board members. This has resulted in better leadership and coordination of tasks amongst the groups.

In November 2015, the LSCB re-introduced an Executive Group which consists of the key statutory partners: the local authority (children’s services), police, probation and health commissioners. This group acts as the strategic management body of the main board. Its key function is to performance manage the LSCB through its systems, processes and impact. The Terms of Reference for this group can be found in Appendix 2.

The LSCB has six subgroups and the work of these groups is reflected within this report:



The membership of sub-groups has been reviewed to ensure they are multi-agency and members are able to make decisions on behalf of their organisations. Each sub-group is now well represented by children’s social care, acute health, mental health and community health services, police, education and the voluntary sector. The sub-group chairs and the LSCB chair meet regularly to share their work and provide updates on progress. This ensures a clear interface across the work streams and avoids silo working.

1.1 Relationships with other Strategic Boards

Health and Wellbeing Board

Health and Wellbeing Boards (HWBB) were established by the Health and Social Care Act 2013. HWBBs are a statutory requirement for local

authorities and are intended to be a Board where key leaders from health and care commissioning agencies work together to improve the health and wellbeing of their local population and reduce health inequalities.

The Tower Hamlets Health and Wellbeing Strategy is a key commissioning strategy for the delivery of services to children and adults across the borough and so it is critical that, in compiling, delivering and evaluating the strategy, there is effective interchange between the HWBB and both the Local Children's and Adults' Safeguarding Boards. Specifically there needs to be formal interfaces between the Health and Wellbeing Board and the Safeguarding Boards at key points including:

- The needs analyses that drive the formulation of the Health and Wellbeing Strategy and the Safeguarding Boards' annual business plans. This needs to be reciprocal in nature assuring that Safeguarding Boards' needs analyses are fed into the Joint Strategic Needs Analysis (JSNA) and that the outcomes of the JSNA are fed back into safeguarding boards' planning;
- Ensuring each Board is regularly updated on progress made in the implementation of the Health and Wellbeing Strategy and the individual Board plans in a context of mutual challenge;
- Annually reporting evaluations of performance on plans to provide the opportunity for scrutiny and challenge and to enable Boards to feed any improvement and development needs into the planning process for future years' strategies and plans.
- Following on from consultation between the Chairs of the HWBB, the LSCB and the Safeguarding Adults Board (SAB), a protocol has been agreed which sets out the expectations and interrelationships between health and safeguarding, making explicit the need for Boards to share plans and strategies and offer challenge to each other. The LSCB will therefore present its annual report to the HWBB to enable the HWBB to incorporate LSCB priorities in its own strategy. The HWBB will bring its strategy to the LSCB on an annual basis to further support the LSCB with the development of its strategy and Business Plan. The Independent LSCB Chair is an identified stakeholder of the HWBB, receiving agendas and newsletters relating to the HWBB, in addition to attending the HWBB to present the annual report, and attending meetings as appropriate to ensure synergy of work and challenge to the partnership to ensure safeguarding is prioritised.

Community Safety Partnership

The Tower Hamlets Community Safety Partnership (CSP) is a multi-agency strategic group led by the Council, and set up following the Crime and Disorder Act 1998. 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. The CSP is made up of both statutory agencies and co-operating bodies within the borough and

supported by key local agencies from both the public and voluntary sectors. Registered Social Landlords (RSLs) have a key role to play in addressing crime and disorder in their housing estates. 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 deal with the perpetrator. Ultimately the CSP has a duty to make Tower Hamlets a safer place for everyone.

The CSP is required by law to conduct and consult on an annual strategic assessment of crime, disorder, anti-social behaviour, substance misuse and re-offending within the borough and the findings are then used to produce the partnership's Community Safety Plan. The LSCB actively contributes to this wide reaching consultation process.

The CSP 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 the CSP will place an added focus on these areas which will be the priorities for 2013-16.

These are:

- Gangs and Serious Youth Violence
- Anti-Social Behaviour (including Arson)
- Drugs and Alcohol
- Violence (with focus on Domestic Violence)
- Hate Crime and Cohesion
- Killed or Seriously Injured
- Property / Serious Acquisitive Crime
- Public Confidence
- Reducing Re-offending

The Council's Head of Community Safety is a member of the LSCB to ensure that there is a formal link between the work of the two boards. This has ensured that the perspective of community safety is integral to the work of the LSCB and vice versa.

Safeguarding Adults Board

The Safeguarding Adults Board (SAB) is a statutory requirement set out in the Care Act 2014 which gives duties to ensure that all agencies work together for the welfare of adults. The main responsibilities of the SAB are set out in Part 1, section 43 of the Care Act 2014 and include the requirement to co-ordinate and quality assure the safeguarding adults activities of the member agencies.

The independent chairs of both the LSCB and the SAB meet together to ensure that there is collaborative working on both agendas. The new Care Act duties for SABs are in many ways aligned to those for LSCBs, and to maximise the joint working opportunities, the Council has restructured to align the support for both boards within its Policy, Programmes and Community

Insight service. This has further strengthened the existing formal arrangements for joint working.

Both boards continue to have a focus on adult mental health, preventing violent crime and domestic abuse as this affects both vulnerable adults and children. An additional area of joint focus over the last year has been safeguarding people from the risks associated with radicalisation.

The Children and Families Partnership

The Children and Families Partnership Board (CFPB), unlike the LSCB and HWBB, is not statutory. However, in Tower Hamlets it is the recognised forum where multi- agency partners convene to further a wider range of outcomes for children, young people and their families. The Independent LSCB Chair is a member of the CFPB, which meets every two months.

The role of the Independent Chair of the LSCB on the CFPB is crucial as it ensures that the policies, strategies and projects discussed at the CFPB can be aligned to safeguarding best practice and outcomes, providing challenge and opportunities for the LSCB and CFPB to work together.

The Children and Families Plan 2016-19 has been developed by the Children and Families Partnership to provide a framework for how our Partnership will work together to continue to improve outcomes for children and families in Tower Hamlets.

Significant progress has been made in a number of key areas since the last Children and Families Plan (2012-15) was produced. The number of children living in poverty has gone down, education results have gone up and more of our young people are in education, training or employment. The Plan for 2016-19 aims to build on this progress and key areas of it will be delivered by the LSCB.

1.2 Budget

The LSCB budget consists of contributions from a number of key statutory partners and is managed by the London Borough of Tower Hamlets (LBTH). Working Together, 2013 first placed an increased emphasis on no single agency being overly burdened with the cost of running the LSCB and stated that the LSCB budget is a shared responsibility across the partnership.

Following this, an exercise was undertaken to review the actual costs of supporting the LSCB's work. For example, serious case reviews, learning events, communications and involving young people.

The following table shows contributions to the LSCB for 2015-16:

Agency	Contribution	Fixed
Met Police Service	5,000	Fixed Pan-London
London Probation Trust	2,000	Fixed Pan-London
East London Foundation NHS Trust	2,500	
CAFCASS	550	Fixed Nationally
Tower Hamlets Clinical Commissioning Group	15,000	
Barts Health NHS Trust	3,000	
London Borough of Tower Hamlets	15,000	
Total Annual Contribution	43,050	

For a full breakdown of LSCB Income and Expenditure for 2015 -16 see **Appendix 4**.

For the coming year 2016-17, Tower Hamlets CCG has agreed to increase their contribution to £30,000 . In addition, the Schools Forum in Tower Hamlets and the London Fire Brigade are new contributors and have agreed to provide some financial contribution to support the work of the LSCB. These have been gratefully received. This will increase the current budget from £43,050 to a total annual sum of £78,550.

The LSCB Executive Group will consider how it will meet any unforeseen expenditure, such as the cost of additional serious case reviews.

1.3 National and Legislative Context

In March 2015 the Department for Education (DfE) published the revised Working Together to Safeguard Children (2015) and in anticipation the LSCB undertook a gap analysis exercise to identify the areas where it needed to further develop. Local developments have included the LSCB Independent Chair reporting directly to the Chief Executive of the Council and progress towards making the costs of the LSCB more equal across different organisations. We have also developed an outcome-based learning and improvement framework, which focuses on three areas of learning: serious case reviews, audits and multi-agency training.

Section 14 of the Children Act 2004 and Working Together to Safeguard Children 2015 sets out the statutory objectives and functions for an LSCB as follows:

1. To coordinate 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 area; and

2. To ensure the effectiveness of what is done by each such person or body for those purposes.

Regulation 5 of the Local Safeguarding Children Boards Regulations 2006 sets out that the functions of the LSCB, in relation to the above objectives under section 14 of the Children Act 2004, are as follows:

1(a) developing policies and procedures for safeguarding and promoting the welfare of children in the area of the authority, including policies and procedures in relation to:

- (i) the action to be taken where there are concerns about a child's safety or welfare, including thresholds for intervention
- (ii) training of persons who work with children or in services affecting the safety and welfare of children
- (iii) recruitment and supervision of persons who work with children
- (iv) investigation of allegations concerning persons who work with children;
- (v) safety and welfare of children who are privately fostered
- (vi) cooperation with neighbouring children's services authorities and their Board partners

(b) communicating to persons and bodies in the area of the authority the need to safeguard and promote the welfare of children, raising their awareness of how this can best be done and encouraging them to do so

(c) monitoring and evaluating the effectiveness of what is done by the authority and their Board partners individually and collectively to safeguard and promote the welfare of children and advising them on ways to improve

(d) participating in the planning of services for children in the area of the authority; and

(e) undertaking reviews of serious cases and advising the authority and their Board partners on lessons to be learned

Regulation 5 (2) which relates to the LSCB Serious Case Reviews function and regulation 6 which relates to the LSCB Child Death functions are covered in chapter 4 of the Working Together to Safeguard Children guidance. Regulation 5 (3) provides that an LSCB may also engage in any other activity that facilitates, or is conducive to, the achievement of its objectives.

In order to fulfil its statutory function under regulation 5 an LSCB should use data and, as a minimum, should:

- assess the effectiveness of the help being provided to children and families, including early help
- assess whether LSCB partners are fulfilling their statutory obligations
- quality assure practice, including through joint audits of case files involving practitioners and identifying lessons to be learned
- monitor and evaluate the effectiveness of training, including multi-agency training, to safeguard and promote the welfare of children

In 2015/16 the government issued additional guidance to all LSCBs in respect of radicalisation and extremism which needs to be recognised as a safeguarding issue and should be included in the quality assurance work undertaken by the Board.

Additionally the government contacted all LSCB Chairs and Chief Executives of councils in 2015 following publication of the Jay report reinforcing the importance of ensuring robust responses to Child Sexual Exploitation.

In May 2016, the Wood Report was published. The report details a review of the role and functions of LSCBs with a view to making safeguarding arrangements for children more effective. It sets out a new framework for improving the organisation and delivery of multi-agency arrangements to protect and safeguard children and contains recommendations for national government to consider. These recommendations suggest that appropriate steps should be taken to recast the statutory framework that underpins the model of LSCBs, Serious Case Reviews (SCRs) and Child Death Overview Panels (CDOPs). The report argues that on a scale of prescriptive to permissive arrangements, the balance has moved too close to a focus on how things should be done rather than on outcomes for children and young people. During the course of 2016/17 the Tower Hamlets LSCB will be considering what changes are required in light of this report.

A full copy of the Wood Report can be found via the link below:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/526329/Alan_Wood_review.pdf

1.4 Local Background and Context

Population

The estimated resident population of Tower Hamlets is 284,000. Over recent years, the borough has seen some of the fastest population growth in the country. Tower Hamlets remains a relatively young borough, with almost half of the recent population rise concentrated in the 25-39 age range. The profile of the borough is one of increasing diversity, with 43% of the population born outside of the UK. There are sizeable Bangladeshi (32%) and White British communities (31%) and an increasing number of smaller ethnic groups in the resident population.

Tower Hamlets is the third most densely populated borough in London, and the daytime population increases to 396,000 during the day. Over 100,000 commuters commute to work in Canary Wharf each day, and major tourist attractions like the Tower of London draw in over 4,000,000 visitors each year.

The population of Tower Hamlets is diverse, but there are many active communities who get on well together, with a thriving community and voluntary sector. Community facilities such as Idea Stores and leisure facilities are well-loved and well-used. The borough has seen unprecedented

educational success, opening up more opportunities to the young people coming through our schools, and employment rates are rising.

Despite all this change and success, Tower Hamlets still has challenges to face. Too many residents have significant health problems. High housing costs and low incomes mean that homes are unaffordable for many. Too many residents are not in work and struggle to make ends meet, especially as reforms erode the welfare state and costs of living rise. One of the biggest challenges the borough faces is ensuring that the benefits of growth and prosperity reach all parts of our community, with a fairer distribution of wealth and income across Tower Hamlets.

Children and Young People

In 2014, there were an estimated 69,300 children and young people aged 0 to 19 living in Tower Hamlets, representing approximately 25% of the total population. The young population in the borough is projected to rise in line with the general population growth.

In spring 2016, the school census records indicated that over 90% of pupils belonged to an ethnic group other than White British compared to 27% in England. Furthermore, English is recorded as an additional language for 73% of pupils where English and Bengali are the most commonly recorded spoken community languages in the area. The single largest group (64%) of children and young people of statutory school age (5 to 15) are of a Bangladeshi background.

Health

Reducing the inequalities in health and wellbeing experienced by so many Tower Hamlets residents is one of the biggest challenges facing the borough. Although life expectancy has risen over the last decade it continues to be lower than the London and national averages, and significant health inequalities persist. People in Tower Hamlets tend to become ill at an earlier age and this is reflected in the 'healthy life expectancy' figure which is lower than the national average. The life expectancy gap between Tower Hamlets and England as a whole is 1.9 years for men and 0.5 years for women. 13.5% of residents have a health condition or disability which limits their daily activities, and Tower Hamlets has a higher number of residents with a severe disability compared with London and England, despite our relatively young population. Tower Hamlets has some of the highest death rates due to cancer, cardiovascular disease and chronic lung disease in the country. Tower Hamlets also has amongst the highest adult infection rates of HIV, tuberculosis and sexually transmitted infections in London.

The health and wellbeing of children in Tower Hamlets is mixed compared with the England average. Infant and child mortality rates are similar to the London average. However, children in Tower Hamlets have worse than average levels of obesity: 22.5% of children aged 4-5 years and 41.9% of children aged 10-11 years are classified as overweight or obese. In addition, oral health is poor, with 45% of 5 year old children experiencing tooth decay compared to 28% nationally.

Low birth-weight is associated with poorer health and educational outcomes, and Tower Hamlets has high levels of babies born with low birth-weight (low birth weight is less than 2500g and very low birth weight is less than 1500g), at 9.3% compared to a London average of 7.7% and 7.4% for England. The cause of this is not known and the borough's Joint Strategic Needs Assessment (JSNA) flags a need for further work to determine this. Nevertheless, it is known that early access to high quality maternity services to support women through pregnancy can have an impact. There have been significant improvements in these services in Tower Hamlets over recent years but poor outcomes persist, pointing to a need to focus on the wider determinants of health such as deprivation.

In addition to improvements in maternity services, local NHS services have, in recent years, made significant improvements to immunisation rates, with coverage amongst the highest in the country for under 5s.

Whilst there are high levels of sexually transmitted diseases amongst adults in Tower Hamlets (8th highest in the country), the available data suggests that amongst young people infections may be relatively low. The rate of chlamydia infections in 15-24 year olds is below London and national averages. Whilst the rate of alcohol use in young people is low, drug use in the population is high.

The relationship between the LSCB and health partners, both commissioning and providers, is critical if we are to have an impact on improving the lives of vulnerable children and young people.

Child Poverty

The latest available child poverty data is from 2015^[1] and shows that 49% of children and young people in the borough live in poverty. This is the highest child poverty rate in the UK, despite recent falls in line with the rest of London. In the same year, 53% of pupils were eligible for free school meals in state-funded secondary schools, which is the highest level in the country. This level of disadvantage is likely to have lifelong negative effects on the health and wellbeing of children.

The majority (83%) of these children live in families reliant on out-of-work welfare benefits.

The rate of homelessness acceptances is in line with the average for London in 2014 (5.1% per 1,000 households) despite it having fallen from a higher rate five years previously (8% per 1,000 households) while across London the rate rose. Similarly, while the rate of households in temporary accommodation rose in London between 2010-2015, it fell in Tower Hamlets though the rate is still higher than average (18.6% per 1,000 households compared to 13.6% as the London average). There is a high rate of overcrowding in the borough with 16% of all households overcrowded.

^[1] London's Poverty Profile Report 2015, New Policy Institute, www.londonpovertyprofile.org.uk/indicators/boroughs/

In Tower Hamlets, just under half (49%) of all children in poverty live in couple families and the remaining 51% live in lone parent households.

Welfare Reform

Welfare reform remains one of the biggest challenges facing Tower Hamlets, in terms of the economic wellbeing of residents as well as the financial impact on the Council and housing providers. Led by Tower Hamlets Council, the Welfare Reform Task Group was created in 2011 to co-ordinate the work of local partners in responding to the changes by monitoring the impact of welfare reform on local people, supporting residents to respond positively and, where possible, helping to mitigate its effects.

The welfare reform agenda introduced under the Coalition Government was wide-ranging and affected in and out-of-work benefits as well as needs-based entitlements (such as disability and housing benefit). Over 600 households in Tower Hamlets were impacted by the annual £26,000 'Benefit Cap', whilst 2,300 households lost income due to the introduction of the "bedroom tax". Locally commissioned research estimates that the cumulative impact of all welfare reforms to date has resulted in claimant households losing an average of £1,670 per year, or £32 per week in Tower Hamlets.

The majority Conservative Government elected in May 2015 committed to developing welfare reform further, with significant additional risk to Tower Hamlets residents and the local authority. The 'Benefit Cap' will be reduced to £23,000 per annum in autumn 2016, which is anticipated to have a negative impact on over 1,000 households locally and the continued freeze of Local Housing allowance (LHA) rates is driving growing levels of homelessness, with increasing numbers of households being placed in 'out of borough' temporary accommodation. In addition, the re-assessment of all recipients of Disability Living Allowance and Incapacity Benefit for transition, to replacement benefits (Personal Independence Payments and Employment & Support Allowance) continues, resulting in significant hardship and anxiety for those affected by these changes.

To date, partners on the Welfare Reform Task Group have worked collaboratively to implement an ambitious 'Action Plan' to help residents affected by these changes. A series of projects have secured positive outcomes for 'at risk' residents, for example:

- 800 people have received one-to-one advice and support;
- £2.7 million provided via Discretionary Housing Payments (DHP) to help people maintain tenancies;
- An Integrated Employment Service has been developed to support those furthest from the labour market into work;
- A number of Digital Inclusion projects have been commissioned to support residents get online and develop their digital skill-set.

Going forward, the Welfare Reform Task Group will be reviewing its approach to take account of the emerging needs of the affected claimant population (more complex and harder to reach) and significant changes in the operating

environment, with shrinking public resources likely to limit the breadth and effectiveness of mitigation interventions that can be undertaken by the statutory sector.

Education and Employment

In 2015, 62% of children achieved a good level of development at the age of 5 compared to a national average of 66%. Despite steady improvement over the last 3 years, this indicates that the issues highlighted above are continuing to impact on children in the early years.

Despite this disadvantage, at school children do well. In 2015 84% of children achieved the expected Key Stage 2 level in Reading, Writing & Maths by the end of primary school. This figure was above the national average of 80%. In 2015 GCSE results revealed that 64.6% of children achieved 5 grade A*-C passes including English and Maths. This compares favourably with the national figure of 57.3% for state funded schools in England. Tower Hamlets results for GCSEs have been above national average since 2011.

At the age of 16, the proportion of young people who are not in education, employment or training is relatively high, although this figure drops to below the London average for those aged 18.

Level 3 (A-Level or equivalent) results are below the London and National average, although there has been some improvement. Between 2013/14 and 2014/15, the gap between Tower Hamlets and the national average (for state schools and colleges) has been reduced.

Our most vulnerable young people in Tower Hamlets

Unsurprisingly given the multiple indicators of social disadvantage highlighted in this report, the rate of **children in need** per 10,000 population for Tower Hamlets in 2015/16 remains relatively high at 779.1, compared to the 2014/15 figure for England of 674.4 and 702 for London. This year's figure for Tower Hamlets has increased from 2014/15, where the rate of children in need per 10,000 was 736.2.

In 2015/16, the rate of children subject to a **child protection plan** per 10,000 population in Tower Hamlets was relatively high (50.1) compared to the 2014/15 rates per 10,000 for England at 42.0 and 40.6 in London. The figure for Tower Hamlets in 2014/15 was 50.9 per 10,000.

The percentages of children subject to a child protection plan by category for 2015-16 are:

Category of Abuse	50.1 Per 10,000 population
Emotional Abuse	49%
Neglect	28%
Physical Abuse	19%
Sexual Abuse	3%
Multiple Abuse	1%

Section 2: Progress against priorities

2.1 Priority 1 - Child Sexual Exploitation (CSE)

What we said we would do this year:

- Implement findings and recommendations from the Independent CSE Review with an immediate focus on refreshing the local CSE Framework, including Multi-agency Sexual Exploitation (MASE) Panel, referral pathway and strategic oversight.
- The CSE Review made a number of recommendations for the LSCB, and agency specific recommendations for children's social care, Barts Health and the Police. These suggest the need for further work in Tower Hamlets to improve our knowledge around the local CSE landscape, including the readiness of the workforce to recognise and respond appropriately.

What we did and the difference it made:

The LSCB undertook an in-depth review of CSE strategic oversight and operational delivery. As a result it refreshed the CSE sub-group and established a new strategic framework in Tower Hamlets. The CSE practitioner forum continues to inform the MASE Panel which in turn provides analysis on trends and identifies practice improvement areas. This is considered by the CSE sub-group which then provides a strategic response. As a result of these actions:

- Concerns for young people at risk of sexual exploitation come to notice through the multi-agency safeguarding hub (front door) or directly to our CSE single point of contact in either children's social care or the police public protection unit. The most common presenting behaviour that triggers a referral is usually when a child has gone missing from home or care. Very rarely do young people make disclosures or allegations themselves, as few understand or accept that they are being exploited.
- We undertook a CSE case tracking audit as part of a pan-London exercise to understand the challenges across the city. For the period between November 2014 and October 2015, 67 young people of concern were reviewed by the MASE panel or were subject to CSE/Missing child protection strategy meetings. All were female with the highest numbers falling within the 13-16 age group. The youngest referred was aged ten. The breakdown of ethnicity of the 67 young people is: 20.1% Bangladeshi/Asian/Mixed Asian; 11.4% White/British; 5.36% Black/African/Mixed; 4.69% Mixed/Other and 2.68% were from White/Other background. 5.36% were known to have a disability. This information tells us that our local 'victim' profile has remained consistently in line with age, demographics and presenting behaviours over the last few years. Though concerns for boys remain under-reported they do feature in our missing children cohort. The level of prosecution of CSE offenders is very low but this is representative of London and national levels.

- Since the adoption of the pan-London CSE Operating Protocol which introduced the MASE panel in February 2015, we can begin to evidence an improvement in identification, disruption and prosecutions therefore directly improving the outcome for some young people. For the period November 2014-October 2015 our local police disruption activities have led to:
 - Five abduction notices served on mainly adult males
 - Two teenage males were arrested and charged as part of disruption plans and a further two adult males were convicted of a range of CSE related crime or breach of orders, though none received custodial sentences
 - One case where a civil order was instigated (Sexual Risk Order)

- The CSE subgroup has developed a new strategic work plan which focuses on improving practitioner knowledge of our referral pathway, increasing intelligence on our local CSE problem profile and links with missing children and those associated with gangs and groups, introducing interventions with perpetrators through harmful sexual behaviour work as well as aiming to increase our disruption opportunities. As a result of these objectives, we have learnt that:
 - Tower Hamlets Ending Gangs, Groups and Serious Youth Violence Strategy should establish an accurate gang problem profile. Once this data is available, we will hold a set of triangulated data that informs a CSE profile that is evidence based. Without the full dataset from our partners in social care (CSE/Missing), police, probation, youth offending, youth service, education etc. we cannot fully understand who our perpetrators and hidden victims are. For example, whilst there is some anecdotal suggestion that there is a tentative link between gang activity and CSE and the correlation with young men perpetrating domestic violence in their families, we are unable to establish the evidence base to demonstrate this or give a reliable indication of the size of the problem.
 - Our case work and multi-agency intelligence sharing to date has provided a better picture of increasing instances of peer-on-peer sexual exploitation, of some of our LAC moving across borough boundaries as part of their exploitation experience and that there are a number of young people who are persistently going missing from either home or placement and connecting with other high risk young people, in turn placing them at greater risk.
 - From our maturing CSE database profile we are also seeing drug use and drug dealing a feature in exploitative relationships where female victims are being used and coerced to hold or traffic drugs and weapons. More illegal raves are being accessed via coordinated social media leading to underage entry in to clubs.
 - Amongst our Bangladeshi families, we are seeing and working with a number of older boys and girls who have become overly powerful within their families, especially where parents cannot manage their

children's behaviour putting them at higher risk of gang involvement, sexual exploitation and possibly so called 'honour' based violence. The council's early years parent and family support service has reviewed its parenting programmes to ensure parents are aware of CSE and able to recognise the associated risky behaviours. The emphasis is placed on the importance of parent's recognising and managing behaviour positively throughout the child's development to adolescence.

A programme of awareness raising events has taken place this year with targeted sessions for specific professionals in housing, youth service, health agencies, foster-carers and the voluntary sector. This year we have introduced level 2 (intermediate) CSE training to equip those directly working with victims of CSE or those at risk with the necessary skills and practice tools. This is being delivered by the Safer London Foundation Trust.

2.2 Priority 2 – Harmful Practice

What we said we would do this year:

Harmful Practice includes Female Genital Mutilation (FGM), forced marriage, so called 'honour' based violence and abuse related to witchcraft and faith based abuse. Tower Hamlets continues to be involved in the MOPAC Harmful Practice Pilot. The pilot focuses on Early Identification and Prevention, Safeguarding and access to support, Enforcements and Prosecutions and Community Engagement. It aims to:

- Increase identification of vulnerable children (and women) at risk of FGM
- Increase awareness amongst professionals through dedicated training at 2 levels, multi-agency training and specialised training for health professionals, social workers and police officers
- Increase the number of cases supported by specialist services through better identification and dedicated referral pathways across FGM and wider harmful practice areas relating to VAWG
- Increase the number of champions from voluntary sector organisations in Tower Hamlets and the community to support survivors of FGM and tackle beliefs in the future

What we did and the difference it made:

Key activities delivered this year have focused on multi-agency and targeted training, specialist advocacy support and increased safeguarding of children at risk of FGM. We have recruited two FGM community mediator posts, three specialist FGM focused child protection advisors, a male worker to work across all five pilot boroughs with a focus on FGM and set up provision for a specialist therapist. This has also been made possible by the successful DfE Innovation received funding in April 2015 which adds value to the MOPAC pilot through increased focus on safeguarding and FGM.

In partnership with Waltham Forest, Tower Hamlets decided that, in order to extend reach, professionals from either borough can attend each others'

harmful practices training offer accessed through the LSCB training programme.

As a result of the new posts:

- 32 families with 87 children have been referred to the Specialist Social Worker, they have been assessed and risks identified
- There have been 40 community engagement events and training and they have reached out to 142 women and 120 men and recruited 20 peer champions.
- Awareness raising work has also been carried in schools involving 480 young girls, 180 young boys and 200 school staff
- Girls at risk are identified pre-birth through proactive information sharing between maternity services and social care
- Referrals lead to timely and effective intervention with mothers who are FGM victims and their families
- Targeted intervention with identified families has led them choosing not to have their daughters cut
- A range of preventative work with the community is in place to end harmful practice for future generations

2.3 Priority 3 – Children Looked After

What we said we would do this year:

- Redefine our Corporate Parenting role so that its pledge and vision for children looked after is strengthened 'to help children and young people grow and belong, have a fulfilling life, live a healthy, happy life, pursue interests, goals and more. It will also ensure children and young people have time to relax, spend time with family and friends, think about what they want to do with their lives, and have a sense of achievement and purpose'
- Implement the refreshed looked after children (LAC) strategy 2015-18 to ensure there are sufficient placements, meaningful participation and better education and health outcomes for LAC
- Develop new guidance for practitioners in leaving care services which will focus on new approaches that encompass friendship and peer support model, a move away from relying on traditional 1:1 social work support
- Introduce an enrichment programme of events for children looked after to grow children's aspirations and broaden their activities to widen their future horizons
- Provide children looked after with additional educational support through a 'local offer' of Maths and English tuition (or other subjects) so their aspirations are realised
- Undertake an audit of cases where children show their distress through challenging behaviour. The purpose of this audit is to identify areas of improvement in social work practice and the response experienced by the child
- Improve mental health support to LAC with a more dynamic and accessible referral process by embedding a dedicated Child and Adolescent Mental Health Service (CAMHS) team within children's social care

- Improve our response to the voice of foster-carers in assessment and intervention; and increase support to out of borough carers
- Consult with young people who have experienced a removal of their liberty, either through secure placement or prison setting, so there is a good understanding of their specific support needs.

What we did and the difference it made:

Further detail of our work with children looked after can be found in section three of this report.

2.4 Priority 4 – Neglect Strategy

What we said we would do this year:

- The THSCB Performance Report to incorporate the agreed neglect indicators so that there is a clearer picture for this cohort of children at risk of harm
- Multi-agency case audit programme to include another audit of neglect cases but the range of cases is to be widened so that THSCB can compare improvements that are being made to practice and identify targeted areas for improvement year on year.
- Undertake a review of the wider impact of the Neglect strategy following its first year of implementation and report findings to the THSCB membership

What we did and the difference it made:

- We have continued to monitor the number of referrals for neglect through LSCB performance reporting where we have seen a decrease in the numbers this year. While there have been focused awareness raising campaigns and significant learning opportunities, the quality assurance and performance subgroup is exploring the evidence for this in the improved effectiveness in providing early help. There has been some targeted work with schools around assessment and referrals which may have had an impact on how neglect cases are being identified and responded to.
- A revised multi-agency audit programme was agreed through the quality assurance and performance subgroup. This year's schedule placed a priority on audits from serious case review recommendations. Therefore, the specific audit on neglect has been deferred to 2016-17 and will become part of our annual rolling programme thereafter. We will provide an analysis of our findings in next year's annual report.
- The multi-agency Neglect level 1 (introduction) and level 2 training (intermediate) continued to be delivered by a training pool consisting of the LSCB partnership. Over 100 practitioners and managers received neglect training within the year. Evaluation suggests these are received well and practitioners were able to identify areas for personal and service improvement.

- The Jamilla serious case review highlighted how quickly young children's health can deteriorate as a result of neglect and tragically in this case lead to death. The LSCB was tasked with raising that the DfE definition of neglect does not accurately reflect the impact of 'short term neglect'. We did this through the consultation when the Working Together to Safeguard Children Guidance was revised the previous year. However, in the revised guidance published in March 2013, the definition remained unchanged with the focus still remaining on cumulative harm as a result of longer term neglect. The chair wrote to the DfE to challenge this decision and request a dialogue to explore this issue. The then Minister of State for Children and Families, Edward Timpson MP, responded that in his view, the revised guidance made it clear that where professionals are aware of any immediate risks to a child, they must take timely and decisive action to ensure children are not left in neglectful homes. He noted that the definition of neglect includes 'persistent failure to meet child's basic needs' which would include short-term neglect.
- Following this response, the LSCB chair contacted the NSPCC to explore how the key learning from the Jamilla serious case review could be incorporated in to their early intervention work where the links to short term neglect can be further developed through to a practice guide/toolkit. This area is being explored by the NSPCC.

2.5 Priority 5 – Serious Case Reviews

What we said we would do this year:

- Learning from the Child Sexual Exploitation (CSE) and Troubled Lives, Tragic Consequences Thematic Review will be rolled out as widely as possible ensuring further reach.
- Both these reviews were conducted outside of the serious case review methodology but did use a systemic approach. As a result the THSCB will develop a quality assurance plan to understand the short and long term impact on practice and interagency working as a result of changes implemented by partner agencies.

What we did and the difference it made:

- Between January and March 2016, we delivered four multi-agency learning dissemination events attended by professionals from children's social care and youth offending service, health, schools, youth service and the voluntary sector. Approx. 150 practitioners, managers and safeguarding leads were informed of the findings of the thematic review and the associated changes to safeguarding practice and systems.
- In addition, targeted sessions were provided to LSCB board members and the Youth Offending Management Board.
- In response to the findings and recommendations of the Troubled Lives thematic review the following key changes and developments are currently being implemented:

- Tower Hamlets Youth Offending Service (YOS) is to be refocused and combined with early intervention services to allow a whole family and integrated delivery model that provides staff consistency from an early starting point. Post-custody support will be provided through children's social care to improve the experience of young people who are held in police custody. A targeted early intervention service for lower risk groups will be provided through youth services. See section three: No Wrong Door for further detail.
- Significant work has taken place around the assessment and management of risk. The Risk Management Panel has been revised so it can respond to young people (aged 10-17) who are assessed as 'high risk' to themselves and others. This includes high risk of harm i.e. harmful sexual behaviour, violence, arson. High risk of offending and re-offending and high risk to their safety and wellbeing i.e. self-harm, regularly going missing, suicide. The primary aim is to agree and review a multi-agency risk management plan. This will ensure timely and proportionate information exchange and intervention across services and agencies in relation to young people assessed as high risk. For those cases where the risk is of harmful sexual behaviour is high, the NSPCC National Clinical Assessment and Treatment Service (NCATS) will provide case management consultation and support to the panel around transition in to the youth offending team and probation (youth and adult estates).
- The Ending Gangs, Groups and Serious Youth Violence Strategy is in the process of developing a Gangs Profile in the borough which will help practitioners to identify those most at risk. The current borough profile indicates we are unusual in that our cohort of offenders are younger (aged 14-15) and predominantly involved in violence and knife crime.
- As youth offending services are limited to operate within their geographical areas, a social work post has been added to the team to link to those children placed out of borough and involved with YOS as well as those with 'remanded looked after children' status.
- The YOS continue to operate a joint service with Docklands Outreach Team from the Royal London Hospital - they work alongside the emergency paediatric A&E to support the family and friends of youth crime victims.
- Finally, we undertook a new serious case review of a young person referred to as 'Thomas'. Early findings from this case led to the refresh of the Assessment, Intervention, Moving on (AIM) project. AIM is a collaborative approach to assessing and working with young people who display harmful sexualised behaviour. This was originally developed by the youth justice board who refined the tools and processes needed by statutory front line staff to tackle this challenging aspect of harmful behaviour. A new programme will retrain social workers across children's social care and the youth offending service to enable them to undertake specialist assessments to place young people (welfare or remand) and manage them, including managing their return from custody back in to the community. An aspect of the AIMs project is the earlier support some agencies need to manage emerging problematic behaviours within environments such as schools,

foster placements and residential homes. From September 2016, a new pre-AIMs programme will be provided to designated child protection leads in education establishments to support staff to manage young people who do not yet have a criminal profile but whose behaviour is nonetheless of concern. The development of the Risk Management Panel and AIMS project are taking place in tandem due to the correlation between these two areas.

- The messages from the child sexual exploitation review and the implemented changes have been disseminated through the current LSCB CSE training. In addition, the CSE and Missing Children lead officers in children's social care and local police delivered a series of events as part of the National CSE Awareness Day and Safeguarding Month activities. They also provide sessions targeted at specific professionals i.e. housing officers, youth workers so that awareness and areas for service improvement were identified. For example, youth workers often meet young people who may not attend schools or access any other services. As a critical professional in the young person's life, they need to understand which young person is at risk of CSE or a likely perpetrator and actively engage with others to safeguard the young person and others in the wider network. The outcome of the CSE review is covered in more detail under priority 1 section.

2.6 Priority 6 – Safeguarding Children with Disabilities (CWD)

What we said we would do this year:

- Listen and respond to user feedback to inform development of person centred planning in partnership with families. Prepare the workforce to support children in placements within and outside the borough.
- Implement recommendations of the parent survey on short breaks and continue to increase usage and first time self-referrals
- Reduce dependency on transport with increased travel training for children and young people with disabilities
- As part of the transition to adult services action plan parents will be supported to recognise and manage when their child becomes self-aware of their sexuality. In conjunction, there will be further emphasis on developing the local care network as currently not enough emotional support is offered to carers to respond to the needs of the children.
- Through a dedicated post holder, expand messages on safeguarding issues for children and families by utilising the Picture Exchange Communication tool (PEC).
- Influence the commissioning of placements. One of the main concerns to be addressed is the access to CAMHS services for children who are placed out of borough. There needs to be a commissioning led solution as a number of section 47 (child protection) investigations of disabled children are placed in residential schools outside Tower Hamlets. Further exploration to be undertaken with the local CAMHS to consider developing a specialist provision for this group of children.

What we did and the difference it made:

- We listened and responded to user feedback to inform the development of our person centred planning in partnership with our families. We have re-commissioned the Easy Build (Wiki) Programme that was successfully rolled out across eight schools across the borough (mainstream and special schools).
- Last year we said that we would implement recommendations from our parent and peer consultation events. We have acted on feedback from young people and parents in a number of ways including the development of our befriending contract to include an increased offer of group befriending activities. We have also increased the number of direct payments offered to parents and enhanced our directory of short break providers.
- We have reviewed the mobility travel arrangements for holiday provision and have implemented changes that channels further resources to our current short break provision.
- We have reduced dependency on council transport provision with independent travel training for children and young people with disabilities.
- We have developed a Preparing for Adulthood Action Plan. This plan sets out how we will support young people known to children's services, transition into adult services. There has, however, been a delay in implementing the action plan due to staffing issues and we will ensure this is achieved over the next year.
- A dedicated post holder has expanded our communication on safeguarding messages for children and families using the PEC tool.
- We have revised and strengthened our guidance for staff to reflect the Care Act, placing greater emphasis on understanding the child's routine and what the parents can do to meet their own needs outside of their caring role.
- The Clinical Commissioning Group has commissioned and appointed a short break trainer nurse post in the children's community nursing team to train short break providers.
- Tower Hamlets has a robust system in place for identifying and recording the number of children and young people with Special Educational Needs (SEN) or a disability. As a result, we have been able to identify families who are not accessing services and children entitled to short break services. 498 children used short break provisions in Tower Hamlets in 2015/16.
- Last year we made over £950,000 available to our children with disabilities through direct payments for short breaks and for personal care.
- Tower Hamlets Clinical Commissioning Group has commissioned a new paediatric incontinence service.
- Tower Hamlets has strong partnership arrangements for children with disabilities. This provides a high quality scrutiny function and enhanced performance management. Parents and carers are a key component of the funding panel which ensures that needs are met and decisions are transparent.
- CWD social workers are now a key service embedded within the multi-agency safeguarding hub (MASH). This is ensuring there is consistency to responses where there are threshold issues for CWD.

- We have collated the valuable feedback we've received from our young people and their parents. As a result we have streamlined our feedback process throughout children's social care.
- We have increased the voice of disabled children using the PEC. This is helping non-verbal children make choices for themselves and express their needs. There is a dedicated worker funded by the SEND reform grant targeted at children with an Education and Health Care (EHC) Plan.
- Access to psychological therapies through the Disabled Children's Outreach Service (DCOS) continues. The service has demonstrated a tangible improvement in stress management for parents.
- We have extended the Stay and Play Service through Disabled Children's Outreach Service (DCOS) and The National Autistic Society. We now support 25-28 families a week to play, relax and make friends.
- The LSCB has ensured the partner agencies and the chair have contributed toward the CAMHS transformation programme, contributing through consultation and board discussion. See section 4.5 for further information.

2.7 Priority 7 – Lay Members

What we said we would do this year:

- Lay members will continue to play an important role bringing external challenge to the Board.
- Lay members will assist in delivery awareness raising and consultation activities covering a range of safeguarding children issues.

What we did and the difference it made:

- Our two lay members have attended board meetings consistently and continue to bring with them the voice of challenge from the wider and school communities. They have both helped to deliver awareness raising activities and engaged with parents at events, conferences and roadshows. Their presence and support has been invaluable to the LSCB.
- Message from LSCB Lay Members:

“When we joined the LSCB we were not at all clear about what was expected of Lay Members. As time has gone on and we have attended Board and Sub-Group meetings, training sessions and conferences and read a lot of papers, we are much clearer. We have been, in the past year, able to contribute at Board meetings by asking questions and taking part in group discussions. We have, between us, helped out at the Chrisp Street Road Show (Child Abuse Awareness Raising Campaign), run topic-based workshops for parents, raised the issue of safeguarding with school governors and been involved in the work of the Awareness Raising and Engaging Communities sub-group. Our focus for now is on raising the profile of the LSCB in the community so that people know how to make a positive contribution to safeguarding children and young people in Tower

Hamlets. Our future plans include developing a range of safeguarding information material and providing ongoing workshops for parents on issues that matter to them”.

2.8 Priority 8 – Family Wellbeing Model (threshold guidance)

What we said we would do this year:

- Undertake a targeted review of the Family Wellbeing Model (FWBM) to take account of learning from serious case reviews. This will ensure that historical vulnerability is included in tier descriptors and include guidance for practitioners on how to ensure this is recognised when stepping down a case from children’s social care.
- In response to the neglect strategy and the Jamila serious case review, we agreed the need for a closer delivery interface between the Parent and Family Support Service and Children’s Social Care in a number of areas and neglect to be a focus for this year.
- Develop a targeted approach to neglect which assumes that families where there are neglect features may not be getting timely change work (Ofsted Report on neglect). In addition, to test any new neglect assessment tools to determine if families that ‘step up’ into children’s social care is as a result of better identification and whether ‘step down’ is as a result of effective change.
- Through the Parent and Family Support Service work with a small number of schools where there are concerns around low level neglect impacting on attendance and attainment. The service will deliver a bespoke parenting programme using neglect assessments and interventions to these families and will report on the effectiveness of this approach to the FWBM steering group.

What we did and the difference it made:

- In 2015/16 we carried out a full review of the Family Wellbeing Model in light of the Jamilla Serious Case Review. Our risk and threshold indicators were updated to reflect the specific learning around neglect, in particular the recognition of rapid deterioration in the home that can be experienced by younger children subject to neglect. Research and practice knowledge emphasises the impact of long term cumulative neglect but what we learnt in this review is that the quality of care can decline within a very short space of time, and practitioners need to be able to recognise the signs of risk and intervene quickly.
- This LSCB continues to deliver the Neglect training programme which offers an introduction and intermediate level. The training courses are delivered by a multi-agency pool of trainers with expert input from health, social care and education. The messages from local and national serious case reviews is reinforced through the neglect training. Evaluation of these courses report a high level of theoretical and practice learning. Practitioners feel they can implement their improved knowledge in to direct work with children and families.

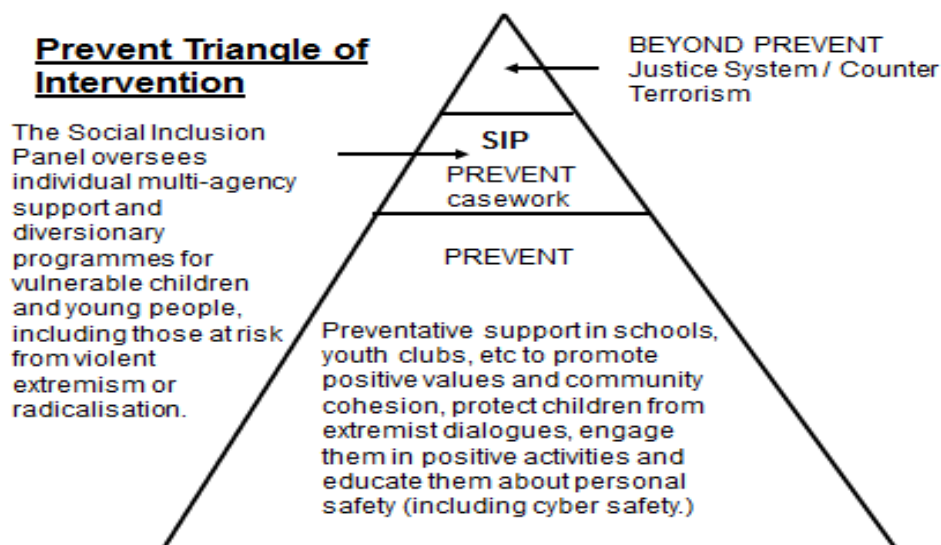
- As part of the FWBM review, a comparison exercise was carried out against the London Continuum of Need and a decision was taken to retain our current indicators included within the model.
- The School Ready/Neglect Pilot was launched by the Parent and Family Support Service. They have been working with a small number of schools/nurseries to initially identify families where there is poor attendance. This is often a recognised indicator of other concerns including neglect. A targeted service is being developed to work with these families to improve school attendance and address other difficulties before they become problematic and require intervention later on.
- Further details of the Family Wellbeing Model within the context of our local early help offer can be found in section three.

2.9 Priority 9 - Responding to Radicalisation and Extremism:

The Prevent agenda has been an area of considerable focus over the past year. The exposure of children to extremist ideology can hinder their social development, educational attainment and pose a real risk that they could support/partake in violence. Tower Hamlets has adopted the principle that “Safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm.” (Home Office – The Prevent Strategy)

In Tower Hamlets we deliver the safeguarding in this context through a multi-agency “Triangle of Intervention” which provides three-tiers of intervention that reflects the Family Wellbeing Model and includes:

- Preventative teaching approaches
- Targeted early interventions
- Specialist responses



In the past year we have undertaken a range of work to improve our local knowledge, response and strategy to safeguard our young people from new risks posed by ideology often through online methods.

Universal Work through curriculum development, guidance and training for schools

Given that the young Girls who left Tower Hamlets for Syria in February 2015 showed few signs of vulnerability and that the online grooming process was significant in this process, the importance of promoting an alternative narrative and resilience through the curriculum is key.

Building on existing community cohesion and “No Place for Hate” work with schools, Children’s Services has developed a range of teaching resources and support materials around the broad themes of Prevent, supported and developed with the assistance of a Home Office funded Education Officer. These resources have been well received by schools as they reflect the local context in which they operate. Furthermore, two annual school conferences have now been held to showcase best practice.

A mapping tool has also been designed to support schools in identifying which aspects of the curriculum can support the Prevent aims and “British Values” in each year group.

Guidance and posters have been provided to schools on their role in preventing extremism. The guidance includes sections on:

- Amending safeguarding policy
- Staff training and awareness raising
- Reporting
- Interventions with individuals
- Prevention through the curriculum and pastoral work
- Visitors policies and use of school premises
- Responsibilities, including governors
- Internet security
- Triangle of intervention (above diagram)

A checklist has been issued for schools to support them to ensure their safeguarding policies now meet the Prevent guidance and to support them to undertake a risk assessment as they are required to do under the “Prevent Duty” (since July 1st 2015).

There has also been an ongoing programme of central training for school safeguarding governors and designated Child Protection leads. Tailor-made training is available for all schools including independent schools. This includes a Workshop to Raise Awareness of the Prevent programme (WRAP) and sessions on policy guidance and referral. These types of training sessions have created opportunities for ‘real discussion’ leading to practical solutions to difficult issues. All maintained secondary schools and most of our academy, free and independent schools have taken up this offer and efforts continue to contact those that have not engaged.

This year the offer has been extended to primary schools and so far 56 out of 90 institutions have had school based training (this includes academies, free and independent schools).

Head teachers are briefed regularly about Prevent issues through the Headteachers' Bulletin and in the Children's Services Director's meetings and this support has been extended to academies, free schools and independent schools.

Targeted Work with Schools

Targeted work has also been undertaken with schools where concerns have been raised. For example, following the flight of the girls to Syria, a multi-agency action plan was designed with the school the girls attended, which included social mapping and risk assessment to identify those children thought to be most at risk of flight, and those vulnerable in other ways. Different tiers of intervention were put in place including assemblies, question and answer sessions, group discussions and individual support programmes, with input from Channel Panel (duty under Counter Terrorism and Security Act 2015) members: children's social care, the police and religious intervention providers where appropriate. This has created opportunities to develop innovative work such as widening the remit of Channel intervention providers to facilitate group sessions in targeted schools and working with staff to help them discuss 'difficult questions' and contentious issues. This initiative is empowering staff to handle situations rather than rely on outside interventions.

A Multi-Agency Partnership Approach

The strategy is enabling partners such as schools, mosques, health services, the police, social care and other agencies to work collaboratively and provide a swift response to the challenges encountered by Prevent work. For example:

- A pamphlet was issued through schools and by the mosques at Friday Prayers, providing coherent safeguarding messages to parents. It was well received locally and has been picked up by police and other boroughs as a model of good practice.
- Parent support sessions including cyber safety and the risks of radicalisation are available to all schools from the Parental Engagement Team (PET). Prevent messages have been embedded in to the parenting courses with training for Parent Support Partners and school based Parent/Family Support Practitioners (The Home Office recently agreed to extend funding for our parenting work.)
- Over the summer holidays the Parental Engagement Team provided a helpline for parents seeking support
- The Humanities Education Centre has provided guidance on British Values and how these can be approached from a Global Learning perspective.
- The Attendance and Welfare Service provides information packs to all the maintained schools, academies, independent schools and free schools, containing all the national and local guidance and procedures on

safeguarding and referral procedures /contacts for non-attendance and for children missing from education.

- There is close work with police officers from Prevent, Channel and Counter Terrorism who are involved in both training and interventions. Channel intervention providers have undertaken creative and high quality de-radicalisation work, working with individuals and groups.
- The SACRE (Standing Advisory Council for Religious Education) lead has raised awareness of the Prevent agenda and explored how spirituality and Social, Moral, Spiritual and Cultural Development can support the Prevent agenda.
- Phase two of the Troubled Families programme (2015-20) also has an emphasis on radicalisation and extremism. Furthermore, Prevent work is now linked into the council's first partnership strategy on Ending Groups, Gangs and Serious Youth Violence: a three year strategy reporting to the Community Safety Partnership Board.

Referrals and Casework to the Social Inclusion Panel

Tower Hamlets resisted setting up a separate Channel Panel as it was felt it would be counter-productive in the local context and lead to negative labelling of young people. The Social Inclusion Panel (SIP) already existed as a senior level multi-agency panel to support vulnerable children and families requiring early intervention. Therefore SIP was given the role of overseeing referrals of young people under the age of 18 thought to be at risk of radicalisation and extremism. This includes those being managed through children's social care interventions as well as those managed through a "Team Around the Child" approach.

The benefit of incorporating Prevent casework into an existing multi-agency panel is that it provides access to a wide range of different interventions to meet what are sometimes very complex and inter-related needs and allows for a fluid movement of cases into other forms of support.

Referrals have come from schools, the police, social care and health services. They have increased significantly in the last 2 years showing confidence in the process and schools have reported they find the advice and guidance they receive very helpful. Two years ago Prevent referrals to this panel were low and the Police data suggested that there should be more referrals than we were receiving: this was largely thought to be lack of awareness amongst referring agencies. There has subsequently been an increase in referrals for early intervention casework to support children who may be vulnerable to extremist messages. Two years ago there were around 4-5 active cases under active monitoring at any one time. Since then, this figure has been as high as 72 but is currently 54 (March 2016). In addition to specific referrals schools now feel sufficiently confident to regularly run concerns past officers for advice and guidance only.

Nearly all of the 54 young people comprise of 13 family groups, for example families stopped en route for Syria or where parents hold extremist views or where a parent is a convicted Terrorist Act offender and whose children may have been subjected to ongoing radicalisation throughout their upbringing.

Referrals have included those at risk from radicalisation from far right groups or white supremacist view but predominantly current referrals relate to extreme Islamist views and the risk of flight to Syria. A significant proportion of those referred are children or young people who, because of their special needs, are extremely vulnerable to manipulation and require protective programmes: this may be because they have Special Education Needs (SEN) or have mental health concerns.

A wide variety of agencies now actively support the SIP plans: schools, parenting services, youth support, information technology support, special educational needs and behaviour support services, anti-bullying advisor, police teams (Channel and Prevent), CAMHS, school health, youth offending and children's social care.

Outcomes for individuals are monitored by SIP until the cases are no longer a concern. Where more active engagement is required child protection plans are put in place or children have been made wards of court to ensure their protection. Overall a robust approach has been taken at all tiers of intervention along with open and frank discussions with parent groups about the safeguarding issues.

Children's Social Care Preventing Violence and Extremism (PVE) Team

The CSC PVE team has been set up to respond to this area of need and offer *a tailored and specialist social work response*. The dedicated team will be in place initially for a year to work with high profile existing cases and those where a statutory CSC response is felt to be necessary. The other main output of this team will be to gather the learning from the cases to add to our knowledge base, training and new assessment approaches going forward.

The CSC PVE team initially expected most referrals would fall in the Tier 2 sector where Prevent or Channel interventions would be undertaken on a voluntary basis. However increasingly there has been a need for a statutory response through child protection procedures. In March 2016 there were 7 Tier 2 cases and over 62 being worked with by the children's social care team.

In some cases it has been necessary to intervene through the court arena, resulting in the local authority obtaining Court orders i.e. 'Wardship', Interim Care Orders and Supervision Orders to secure the safety and well-being of the children. Tower Hamlets CSC are pioneering practice in this area and are regularly approached by government and others local authorities to share our learning.

The LSCB has been highly engaged in the agenda leading on development sessions with the Home Office, and through the Chair and other Board members briefing school governors. The LSCB Chair and Service Head for Children's Social Care also sit on the London Councils Prevent Task and Finish Group and the LSCB Chair sits on the LBTH Prevent Board.

Challenges

Despite the significant progress made in this area of work, there are ongoing challenges. There is no identified funding to support the children's social care

PVE team beyond 2017 and there is now a need to undertake home visits for Home Educating families and tuition classes they use that give cause for concern. This will impact on the already stretched resources for safeguarding children, placing significant burden on the local authority. To date, multi-agency partners have contributed from their own budgets towards joint PVE initiatives.

Work with independent schools in the borough is a challenge. Although the local authority remains responsible for safeguarding all children in the borough regardless of the type of educational institution they attend, there are legal limitations to what it can do. Having said that, the local authority offers to all schools guidance, training, advice and curriculum support in respect of Prevent and safeguarding.

There are also challenges in working with families who home educate (and where tuition agencies support them) because of the very restrictive legal limitations of the LA remit and powers of intervention in this area. The Home Education Steering group regularly assesses the vulnerability of families and intervenes more proactively with those where there is reason to be concerned. There has been a rigorous approach to intervention when concerns have been identified, including supporting the closure of inappropriate tuition services where necessary. At the same time the Parental Engagement Team have started a support group for home educators to enable good practice to be shared with them, for example on cyber safety and curriculum work.

There is a pressing need to roll out an understanding of this area of work more broadly with all agencies. Most of the intensive work in this field was necessary with schools, in response to Ofsted findings and the departure of the first group of girls to Syria in 2014. Social workers becoming increasingly involved during 2015 when more children and families left or were identified as at risk of leaving for Syria. Work with parents in schools has also been developed significantly to support school activity.

Those agencies that have received significant support and training have a better understanding of the Prevent agenda and the safeguarding aspects of this work. However, there needs to be a more consistent understanding across all areas of the council, partner agencies and within the community.

3. Section 3: Scrutinising the Effectiveness of Safeguarding Children Arrangements in Tower Hamlets

Early Help

The Early Help offer in Tower Hamlets is organised around the Family Wellbeing Model (FWBM), which is available at <http://www.childrenandfamiliestrust.co.uk/family-wellbeing-model/>

The FWBM is a model for everyone who works with children, young people and parents or carers in Tower Hamlets – across the partnership, to help them work together to provide the most effective support for children and their families. The Family Wellbeing Model supports the vision of the Tower Hamlets Children and Families Plan 2016-19, which is that children should be healthy, safe, achieve their full potential, are active and responsible citizens, are emotionally and economically resilient for their future. The model was signed off by the THSCB, and is promoted through the activities of the Board. The model sets out support that is available for families at Tier 1 (universal support), Tier 2 (targeted support) and Tier 3 (specialist support). It guides practitioners on how to make an assessment of the level of support needed and how to access that support.

Targeted intervention is supported through the Common Assessment Framework (CAF), and Social Inclusion Panel (SIP), which facilitates multi-agency responses to more complex cases at the top end of tier 2 need. The total number of CAFs completed in the period April 2015 to March 2016 was 938, down from 995 in the previous year. This is a 6% decrease. Following an emphasis on CAF review completion, the number of reviews has increased significantly. In the period between April 2015 and March 2016, 1388 reviews were completed compared to 1148 in the same period last year – a 21% increase.

This demonstrates that the partnership is continuing to make progress in embedding use of the CAF to ensure that families needing early help are effectively supported. In addition, the Social Inclusion Panel monitors the more complex cases at Tier 2 until these show progress or are escalated to Tier 3.

CAF uses a scoring system to set a baseline for families and measure progress. This allows the partnership to assess the effectiveness of early help. In 2015-16, the proportion of families reporting an improvement in their average score at review was 71.2%, which was a slight increase from the 2014-15 figures of 70.6%. On average across the cohort, ALL areas of the CAF showed a drop in score (i.e. improvement) by the time of the review. The number of risk areas also decreased at a slightly better rate than in the previous year. The average risk at the time of assessment was 4.2 but this dropped to 2.6 by the time of the review, a decrease of 1.6. (The drop in 2014/15 was 1.4). This indicates the effectiveness of our early help intervention provided through the CAF.

Use of the SIP as a way of accessing support for more complex cases has continued to increase, demonstrating again that this way of multi-agency working is becoming more embedded across the partnership. 289 new referrals were made in 2015-16, an increase of 20 referrals from 2014-15. There was a significant rise (24%) in reviews of cases at SIP which indicates the degree of close monitoring and follow up these cases require and that referrers are responding to the emphasis placed on regular monitoring and adjustment of support plans as appropriate.

Early intervention and family support services (Early Help Hub)

An 'Early Help' hub is being established to coordinate the pathway to early help support. The aim is that children and young people (pre-birth to 19 or 25 years for those with special education needs and disabilities) and their families are able to access information and the right services at the right time and in the right place to prevent and deal with difficulties before they become problematic. Issues can range from engagement in education, drugs and alcohol, managing behaviour and other parenting challenges. The early help front door will offer a multi-disciplinary approach that brings together a range of professional skills and expertise to:

- Provide a point of reference when the public or professionals are in need of advice and support or where initial steps have not been successful
- Assist where front line services, for example schools, children's centres, youth provisions, health centres, doctors surgeries are unable to meet needs or when extra support is required
- Provide an interface to establish a single first point of contact, screening and referral and ensure Early Help is coordinated efficiently
- Provide an interface with the provision of information, advice, support and signposting services for families, children and young people
- Facilitate multi-agency partnerships at Tier 2 e.g. health, schools, voluntary sector agencies
- The Early Help Hub will advise on referrals into Social Inclusion Panel (SIP) and provide advice and guidance on process and the eCAF system.
- The Hub will provide advice and guidance on referral through to and from MASH and support Step Down from statutory intervention into early help services. Support / facilitate Team Around the Child (TAC) at Tier 2 for more complex cases.

It will not replace existing access to front line support (MASH) but will provide a complementary service that will:

- Strengthen partnerships and improve coordination and access to early help
- Support better and earlier referrals
- Reduce referrals into the MASH

- Improve response to referrals out of the MASH
- Provide a greater focus on outcomes
- Identify gaps and duplication of services
- Ensure the right support reaches families as soon as possible

The Early Help Hub will be launched in September 2016 and will be fully implemented by July 2017.

No Wrong Door

The Council is currently developing proposals to re-shape services for vulnerable children and young people and families (all ages) which builds on an evidenced based service model and evidenced based interventions. This has been developed by children's commissioning and children's social care managers. The service model will require the re-configuration of family intervention and specialist services under a single management umbrella and co-location of key partner services such as CAMHS. It will also require a standard approach to assessment through signs of safety, integrated care plans and joint training and management of the integrated team.

It is envisaged that the proposed service model and common approach across agencies will better support children and young people and will reduce entry to care, secure placement stability and improve the safeguarding of children and young people. It is anticipated that this service can be developed within existing resources by reconfiguring services and working more effectively with partner agencies.

Our recent thematic review, *Troubled Lives, Tragic Consequences*^[2], acknowledges that we need to change the way we work by identifying children earlier and intervening as appropriate. We also know that children and young people have a multitude of services/agencies involved in their lives and that a more integrated approach would produce better outcomes across the continuum of need.

The borough has a significant resource to support our most vulnerable children and families. However, services are arguably fragmented across children's social care and these and others are under different management structures. There is also inconsistency in our approach to supporting families and areas of duplication have been identified. It is therefore timely to consider developing a new integrated service model in order that we can better respond to the needs of our most vulnerable children, young people and families.

Our proposal recommends that services are reconfigured so that children and young people have a single point of access to a specialist, highly trained team and the delivery of a core offer of support based on the 'No Wrong Door'^[3] model which has been built on evidence based practice with a specific focus

^[2] Chard, A (2015) *Troubled Lives Tragic Consequences*.
<http://www.childrenandfamiliestrust.co.uk/wp-content/uploads/2015/12/Troubled-Lives-Summary-Report-Final1.pdf>

^[3] North Yorkshire Council, *No Wrong Door*,
<http://www.northyorks.gov.uk/article/24409/Residential-care-for-children>

on restorative and therapeutic approaches. The service will be available to children and young people on the edge of care, looked after children (including those in residential and external placements – the service will support young people wherever they move to), those leaving care and other vulnerable children at risk.

Young people on the edge of care

Adolescent entrants to the care system tend to experience a larger number of placements, a more disrupted experience of care, poorer outcomes in education and are at increased risk of struggling when they leave care.^[4] There is also a greater proportion of young people 16 years and over in Tower Hamlets compared to other boroughs within inner London.

The Council invests considerable resources within our early help offer, and activity is underway to redesign services across the partnership to support children and families to manage conflict and associated difficulties they face during adolescence, with a new focus on using an evidence based model inclusive of “ No Wrong Door” , Multi Systemic Therapy or Family Focused Therapy, with a strategic workforce plan.

We want to understand our adolescents on the edge of care and employ innovative ways to improve and re-design service delivery to achieve higher quality, improved outcomes and better value for money. To this end, we will work with the Greater London Authority to explore the possibility of creating a Pan-London solution for delivering and funding Edge of Care services.

One potential area of focus would be the use of Social Impact Bonds (SIB) to fund projects to focus on prevention of care, preventing escalation or encouraging de-escalation. SIBs are a financial mechanism in which investors pay for a set of interventions to improve a social outcome. If the social outcome improves, the local authority will repay the investors for their initial investment plus a return for the financial risks they took. If the social outcomes are not achieved, the investors stand to lose their investment.

The Family Wellbeing Model

The Family Wellbeing Model provides a framework for the early identification and provision of support to vulnerable families who do not meet the threshold for referral to Children’s Social Care. The model supports children, young people and families to achieve their full potential by setting out in one place our approach to delivering services for all families across all levels of need. Relevant services include health, early years, education, youth, social care, crime and justice and housing services and any other service impacting on a child or young person and/or their parents or carers.

This Family Wellbeing Model sets out how we work to respond to different levels of need in Tower Hamlets, and gives practical descriptors which anyone can use to help families and children get the most appropriate help and support. The model also clearly sets out our structure for consultation, co-ordination and co-operation between agencies to promote family wellbeing,

^[4] Sinclair et al “The Pursuit of Permanence; A Study of the English Child Care System” 2007

and to ensure that the children of Tower Hamlets get the best deal from what is on offer to support them.

Conceptually this model focuses on early support and targeted help by putting in place robust responses earlier to identify needs with the aim of enabling vulnerable children and their families to lead positive lives without the need for statutory intervention such as entering the care system.

Family Intervention Service

The current Family Intervention Service in Tower Hamlets has been redesigned to cover two strands of the early intervention strategy, Family Intervention Project (FIP) and the Family Support Cluster. FIP provides early intervention to families below the threshold for referral to CSC. The Family Support Cluster multi-disciplinary team targets families where there are complex and entrenched problems with longstanding social work involvement. The aim of the team is to provide intense intervention for children subject to child protection and children in need where families are “stuck”, where the social worker with other professionals are unable to effect change. The Family Support Cluster became operational in September 2011.

Outreach Service

The Outreach Service is being reconfigured to offer a multi-agency family support service targeted at children and young people on the cusp of care.

Short Breaks

The local authority is required under the Children Act 1989 to provide services designed to give breaks for carers of disabled children. The ‘Breaks for Carers of Disabled Children Regulations’ (2010) sets out what local authorities should do to meet their duties in relation to the provision of short breaks. Services for children and young people with a disability are also developed in the context of other related Acts such as the Children and Families Act 2014, the Carers Act 2014, the Children Act 2004 and the Equality Act 2010.

Tower Hamlets’ local offer for short breaks is that all disabled children and young people have access to one short break of choice, within available resources. In 2014/15, 513 children and young people accessed our specialist short break services (an increase of 28 young people since 2011/12).

Short breaks enable disabled children and young people to access the kind of activities that are open to non-disabled children, so that they can lead ordinary lives. They help them have fun, try new activities, gain independence and make friends. Short breaks are one of the services most commonly requested by parents of disabled children. These services also offer parents and carers the much-needed break they need from their additional caring responsibilities.

By providing short breaks to children with disabilities and their families, the Council and its short break partners are supporting these families to cope with the additional pressures they experience in family life. A regular short break can be a lifeline to parents, building their resilience and helping them to continue to care for their child with a disability at home, preventing problems

escalating and reducing the likelihood for the child needing to be taken into care.

3.2 Clear and consistent method of entry to care

The Entry to Care Panel was established in October 2009, in response to increasing concerns about the number of teenagers entering care in an unplanned manner and the overall instability that they experienced after they became looked after. The Entry to Care Panel meets on a weekly basis to consider all children requiring Section 20 accommodation and/or the initiation of care proceedings.

The objectives of the panel are:

- To ensure that only those children who genuinely need to become looked after do so
- To stabilise the number of teenagers becoming looked after
- To effectively focus legal activity
- To increase the consistency and quality of care planning
- To identify and commit resources
- To share information on specific cases
- To develop a strategic senior management overview regarding trends
- To share risk and identify accountability throughout the organisation

Annual reviews are completed to establish whether the Panel's objectives remain relevant and are being met. A review was completed in May 2015, and a detailed report looking at the panel's decision making for assurance purposes was received and approved by Children's Social Care Senior Managers in Oct 2015.

3.3 Children in Need/Child Protection

In 2015/16 there was a 528.9 rate of referrals per 10,000 recorded in Tower Hamlets compared to 548.3 for England and 477.9 for London in 2014/15. Similarly the rate of repeat referrals this year for Tower Hamlets was low at 9.1 compared to the 2014/15 figure for England at 23 and London at 15.8. Referrals which resulted in no further action in Tower Hamlets stand at 8.3% in 2015-16, slightly higher than the 2014-15 London position of 6.9%, but lower in comparison to England (13.8%). This suggests strong arrangements at the point of contact, with referrals for social work input being made appropriately.

In 2015/16, there were high rates of activity in relation to formal child protection enquiries, with a high rate of section 47 enquiries per 10,000 population. There were 194 enquires per 10,000 young people in Tower Hamlets, an increase from 162. This compares to the 2014/15 position of 138.2 in England and 137 in London. There was also a high rate of children subject to a child protection plan per 10,000 population; 50.1 in Tower Hamlets for 2015/16 compared to the 2014/15 results for England at 42.9 and 40.6 in London. This is evidence of strong processes for identifying children

most needing statutory intervention, through our multi-agency safeguarding hub (MASH).

In 2015/16, a high proportion of children remained subject to protection plans for more than two years - 5.6% in Tower Hamlets compared with 3.7% in England during 2014-15. We have looked at a sample of cases again this year to understand this data, and found similar issues to last year of instances of longstanding sibling abuse and violent offenders who return to the home, where it was appropriate to maintain plans for a long period. However in some cases where issues of parental capacity to protect were present, issues were not always resolved early enough. In response to this, Children's Social Care have implemented a focus on the use of the Public Law Outline pre-proceedings and specialist assessments earlier on, to ensure timely resolution of issues.

Certain ethnic groups are over represented in the child in need and children subject to child protection plans populations, in particular those of mixed heritage and white Irish children. This reflects the national picture and the recognised need to ensure effective work with these families. Research exploring this issue in more detail is currently being undertaken in the Council.

3.4 Looked After Children

The number of looked after children per 10,000 population in 2015/16 for Tower Hamlets is 47.3, which is below the 2014/15 England Average of 60 and the London average of 52. The number in Tower Hamlets has slightly increased from last year which was at 44. The Council is currently investigating the reasons for this to ensure that children are not being left at home for too long. Placement stability, an important factor in maintaining good levels of wellbeing, is good, with the proportion of children experiencing three or more placements in a year low, and the proportion in the same placement for at least two years high. In line with the national picture, educational outcomes are poor when compared to their peers. In 2015, 19.4% of looked after children achieved 5 or more GCSEs graded A*-C (inc. English and maths), which is better than the England average (13.8%) and the London average (16.8%). It is also an improvement on 2014 performance (11.5%). Whilst it is important to note that this is a very small cohort (approximately 30 children in any given year) and the level of special educational need is high, this does point to a continuing need to strengthen support to looked after children through school. The proportion of looked after children receiving one or more exclusions in 2014 (latest available data) slightly increased to around 12% from 10% in the previous year which is also two percentage points higher than the England average and one percent higher than the London average.

The proportion of looked after children receiving regular health and dental checks in 2015-16 was 83% compared to 90% in the previous year.

3.5 Private Fostering

The Private Fostering Team sits in the Family Support and Protection Service in Children's Social Care.

Currently there are 22 young people in private fostering arrangements. This is a much lower figure because a number of privately fostered children who turned 16 years of age were discharged with a post 16 support package. There is a downward trend in notifications which is reflective of a general nationwide trend. Anecdotal information suggests the decrease in numbers is likely because of the new Immigration Bill which introduced tighter controls over children travelling to the UK for studies/education purposes and visiting relatives. In addition, welfare reform measures are likely to have placed greater financial burden on those who had previously been willing to privately foster.

The status of our privately fostered young people

In Tower Hamlets, the privately fostered cohort comprises of children who have been abandoned by their parents after coming to the UK, over stayers, asylum seekers and a trafficked young person in 2015 who was not granted leave to remain. The team leads on networking with the Home office, BAAF/CORAM professionals, UCAS and other stakeholders to ensure that the privately fostered young people are assisted even after the age of 16.

Awareness Raising

The Private Fostering Team has continued to implement a range of initiatives aimed at private foster carers and young people. The team also undertakes activities to raise awareness amongst staff within Children's Social Care, the wider Council and partner agencies, as well as with the general public. The objective of the activities and events is in alignment with the National minimum standard which specifies local authority practice in fulfillment of their duties and function in relation to private fostering, which is set out in section 44 of the Children's Act 2004 and the Private Fostering Regulations, 2005.

In July 2015, the Private Fostering Team ran a campaign to promote and celebrate the National Private Fostering week. This included a range of communication activities aimed at staff, the public and other professionals e.g. Headteachers. The Parental Engagement Team and the LSCB through their networks also promoted awareness on Private Fostering and there was specific work undertaken with African families in the borough. The outcome of the campaign was a rise in notifications and five new private fostering cases. In addition, the team runs regular awareness raising events throughout the year and has created a database of all the community organisations, schools and GP surgeries in the borough which is used fortnightly to disseminate information regarding Private Fostering. The team also runs events for young people with the aim of bringing young people who have common experiences together and providing a space for fun and conversations to take place where workers are available to offer support.

3.6 Learning and Improvement – How we learn from what we do

Child Death Overview

LSCBs are required to review all deaths of children in their area. The overall aim of the review process is to learn lessons in order to reduce the risk of preventable child deaths in the future.

The Child Death Overview Panel (CDOP) is responsible for undertaking a review of all deaths of children, up to the age of 18 and excluding those babies who are stillborn. The review process involves collecting and analysing information about each child death to identify any case giving rise to the need for a review mentioned in regulation 5 (1) (e); any matters of concern affecting the safety and welfare of children in the area of the authority; and any wider public health or safety concerns arising from a particular death or pattern of deaths in that area. The review process also involves putting in place procedures to ensure a coordinated response by the authority, their Board partners and other relevant persons to an unexpected death (a 'rapid response').

The responsibility for determining the cause of death rests with the coroner or the doctor who signs the medical certificate and is therefore not the responsibility of the CDOP.

The CDOP decides which, if any, of the child deaths might have been prevented, and also whether there were any potentially modifiable factors where action might be taken to reduce the risk of future child deaths. By considering all local deaths, as well as looking at each child's individual circumstances, the panel considers any emerging themes and also whether there are changes that need to be made to local services or the environment (for example, road traffic safety). The aim of the CDOP is to reduce child deaths by understanding the reasons why children die.

In 2015/16, there were 60 new child death notifications reported to the Child Death Overview Panel (CDOP), 28 were Tower Hamlets residents and 32 were children resident in other areas but who died in a Tower Hamlets hospital or were treated in a Tower Hamlets hospital shortly before their death.

There were 24 cases reviewed in total by the CDOP, twenty of which were recorded as expected deaths, and four were unexpected. Five cases were referred to the coroner. In 13 of the cases reviewed, the death had occurred in 2014/15 and the remaining 11 occurred in year 2015/16. Of the 24 cases reviewed, 13 deaths were to males and 11 to females.

In terms of age, 17 deaths were to infants (under 1 year) of which 11 were neonatal deaths (under 28 days). There were 4 deaths to children aged 1-4 years, 3 deaths of children aged 5-14 years and no deaths to children aged 15-17 years.

In terms of ethnicity, 14 deaths were Bangladeshi, 3 were Black British African and there were also deaths to children of White British, Pakistani, Chinese, Indian and other Asian origins.

Of the 24 cases reviewed, 10 deaths were due to chromosomal, genetic, congenital anomalies, 8 were due to perinatal/neonatal events. There were also deaths due to infection, chronic medical condition, malignancy and acute medical or surgical condition.

The following modifiable factors were identified as a result of the case reviews:

- Poorly maintained housing causing internal dampness and mould may have contributed to respiratory problems
- Lack of recognition, examination and documentation of a feverish child may have resulted in delayed diagnosis of a treatable condition.

Action taken during 2015/16 in response to recommendations included:

- Follow up on regulations, legal requirements for private landlords to maintain their properties to an acceptable standard
- Updated written information for parents on looking after a feverish child, available in the Hospital Emergency Department and GP surgery
- Raised awareness in the community about how to manage a feverish child at home

Actions taken in response to recommendations regarding the operation of the CDOP included:

- In 2014 the CDOP Chair and LSCB Chair wrote to the local Coroner regarding the timely provision of Post Mortem reports for the Designated Paediatrician. This issue was again highlighted at the Pan-London CDOP Chairs meeting in September 2015 with a representative from the Chief Coroner's office, but so far there has been no response.
- Completion of a new database to record and manage data on child deaths
- Ongoing communication improvements to facilitate timely notification of deaths

On-going issues identified from previous years:

- Improve consanguinity documentation and reporting in child death notifications
- Develop training and awareness raising regarding the risks of consanguinity
- Ensure follow up of children who Do Not Attend (DNA) hospital appointments
- Raise awareness of the work of the panel and the system of notification of deaths
- Improve communication with Coroner's Office to improve timely receipt of post-mortem examination reports
- Complete work on setting up CDOP database to facilitate easier access to data:

Serious Case Reviews

The LSCB undertook one serious case review (SCR) in 2015. The subject of this review was a young person we refer to as Thomas and involved a number of agencies from three other LSCB areas and a national charitable trust. The final report and LSCB response to the findings and recommendation is published on the [LSCB Website](#).

The key findings from this SCR highlighted that:

- The child's experience of emotional abuse and neglect and the impact this has on behaviour and parent-child attachment needs to be better understood within the context of child protection
- Earlier recognition of harmful sexual behaviour rooted in childhood experience
- Practitioners are supported in working with challenging parents
- Working within the legal framework for children placed out of borough and ensuring they are able to receive therapeutic support
- Education placements should not be seen as a child protection strategy but part of the wider safeguarding plan
- Processes for managing young people who display harmful sexual behaviour when there is no disclosure or criminal conviction to be developed
- Polarised points of view can become entrenched in the professional network preventing the risks to the child from being recognised and acted on

The identified learning and recommendations will be taken forward through the LSCBs core business of practice, improvement, quality assurance and measuring impact through performance. We will report the difference this serious case review has made to children and young people in next year's annual report.

However, partner agencies took steps to assure the LSCB chair that emerging findings and risk were responded to swiftly. For example, an issue that came to light during the course of the SCR triggered a whole scale audit of looked after children placed out of borough (OOB LAC) along with a review of CAMHS provision to a Special Residential School in South East England. This joint review is currently being undertaken by Tower Hamlets CAMHS, CSC and the Special Education Needs Service at the local authority. An agreement was reached before the conclusion of the SCR to ensure a CAMHS worker is embedded at the residential school to meet the therapeutic needs of children residing there.

The LSCB considered two other cases of which neither met the serious case review threshold as set out in Working Together 2015, but one was subject to a domestic homicide review (DHR). The LSCB will review the outcome of the DHR and consider any implications for safeguarding children. A Serious Adults Review was also commissioned by Tower Hamlets Safeguarding Adults Board (SAB) and as there is overlap with children's safeguarding, the LSCB is involved. Learning will be shared through both LSCB and SAB annual reports.

Following any review the LSCB organises a number of learning events aimed at practitioners and managers. These are always multi-agency in nature and provide dedicated space for attendees to find out about the review and its findings and to discuss implications for their own practice. The contribution of practitioners provides the double-loop learning for the LSCB. Their opinions and suggestions inform how the findings and recommendations are taken forward. The learning from these events is invaluable. A child care practitioner describes how by attending one of the serious case review learning events last year they were able to apply the knowledge they gained directly to their work with children and families:

'I attended the Jamilla Serious Case Review learning events and felt that it was sensitively delivered and gave clear lessons for professionals. For me the key lesson was not to underestimate the potential for late onset of mental health breakdowns following traumatic events in a parent or carer life. A few months later I reflected on this regarding a case I had in court proceedings, whereby the parent was denying her difficult life experiences would negatively affect her or her children in the future. As a result, I initiated an independent assessment that explored to what extent the parent was able to recognise signs that she may be feeling unwell rapidly or in the long term and to what extent could she seek support independently'

Section 11 Audit

The LSCB undertakes a biennial assessment of all LSCB member agencies and organisations in relation to their duties under Section 11 Children Act 2004.

Section 11 (4) of the Children Act 2004 requires each person or body to which the duties apply to have regard to any guidance given to them by the Secretary of State and places a statutory requirement on organisations and individuals to ensure they have arrangements in place to safeguard and promote the welfare of children.

This audit exercise aims to assess the effectiveness of the arrangements for safeguarding children at a strategic level. Each agency must ensure that any statements made within the audit tool are backed by evidence. Partner agencies are also expected to assess compliance with arrangements at operational service level to support their statements in this self-assessment. The LSCB also looks for evidence of impact on improving outcomes for children. This year, the LSCB chair met partners to review and interrogate the individual audit findings. Action plans are developed by agencies to take immediate remedial action which will be monitored through board reporting.

The general findings from the section 11 audit were shared with the LSCB and highlighted the following areas for improvement:

- Commissioning arrangements going forward to include explicit references to safeguarding responsibilities in line with section 11 standards

- Putting in place integrated engagement policy framework to ensure children and young people are engaged through commissioning/service development
- Improving complaints procedures that empowers children to make complaints
- Delays to the disclosure and barring police checks is significantly impacting on safer recruitment and staffing levels
- Use of escalation policies

3.7 Voice of Young People

A number of focus groups were held with young people as members of Tower Hamlets Youth Council and discussions have been held with the young mayor. We asked them what they thought the areas of most concern for young people in the borough and should be tackled to help keep them safe. This group told us that they were most worried about the following areas:

- Youth on Youth Violence
- Safety on the Streets
- Internet Safety and being aware of 'grooming'
- Bullying – online and offline, serious bullying is a frightening experience
- Sexual Exploitation including being made to look at or produce pornography
- Accessibility and exposure to drugs and alcohol
- Self-Harm
- Verbal Abuse – racist/homophobic, threats
- Forced in to joining a gang
- Being knifed
- Emotional Abuse – threatening or intimidating someone
- Running away and keeping safe
- Parent disciplining methods can be abusive & cruel
- Parents failing to provide adequate food & clothing
- Failure to protect Children and Young People makes them feel worthless

In addition, the Chair and business manager attended the Youth Council development session in November 2015 to hear directly from young people and promote the work of the LSCB. The Chair regularly challenges partners at Board meetings and other fora to ensure they are capturing and responding to the voice of young people.

Tower Hamlets' Youth Service and the NSPCC are working on behalf of the LSCB to engage young people to have a direct voice in the LSCB and offer insight in to what agencies can do to help keep them safe at home and in the community. Historically, there has been a Youth Council voice which predominantly focused on community safety issues. These are highly engaged young people but the challenge is to help them to refocus their concept of being safe and contextualise this to safeguarding children at home and within their peer group.

The Youth Service and the NSPCC are planning to hold a series of workshops on child protection and child abuse beginning in the summer half term. The

aim of this is to inform young people what child abuse is, the impact this can have and how it is important to ensure young people have a voice when statutory authorities become involved. It is anticipated this approach will garner interest in a safeguarding champion role at their schools, youth centres and other groups. The LSCB recognises it is a difficult subject to discuss and may prevent young people from engaging in such a group. We will work at their pace to ensure we have a fully functioning formal group in the near future. In the meantime, the LSCB continues to seek the voice of children from focus groups, service evaluation and surveys. The challenge to the LSCB is its ability to listen to a disparate group of voices, deciphering the key messages and feeding back what it plans to do in response.

3.8 LSCB Chair's Challenge to Board Members and Partners

The independent chair has provided a number of challenges to partner agencies over the past year and these have included:

Section 11 self assessments – sessions were held with board partners to interrogate gaps in self assessment areas. This led to an increased understanding of where problems in the system occurred. For example, a number of agencies highlighted the risk posed by the delay in DBS clearance checks for new recruits. The chair wrote to the Police Commissioner to highlight the problem.

Performance Report – whilst some progress had been made with the LSCB dashboard, gaps in the data provided by partners were not deemed sufficiently developed to provide a clear picture of safeguarding children arrangements. The chair sought improvements from health commissioners (CCG) and the police. Both are working towards a robust set of data that demonstrates outcomes for children. For example, the Met Police are developing a pan-London dataset for children at risk of sexual exploitation.

Extremism and Radicalisation – two development sessions were held to ensure partners understood their role in relation to the revised Prevent duties. The chair challenged all agencies to demonstrate what changes they had implemented to ensure children at risk of radicalisation were identified and what interventions were taking place. This is still an area for development and remains a challenge for all, however, the focus on Prevent has led to increased understanding and improvements to agency policy and procedures.

Voice of children and young people – partners were challenged on how their agencies listened to the views of children and what difference they have made. The chair introduced a double-loop learning approach through board agendas to ensure the voice of young people is shared across the partnership to further influence the wider work of the LSCB and that of its partners.

4. Section 4: Safeguarding Assurance from Member Organisations

THSCB partners have contributed to meeting the priorities outlined in section 3. In addition they have also continued to safeguard children from within their agencies:

4.1 London Borough of Tower Hamlets

As the lead agency for safeguarding children, in particular through our Children's Social Care service, much of this report focusses on their activities. For this section of the report, we focus on additional activity across the council that contributes to safeguarding children.

Our schools have an important role to play in safeguarding, and the Council supports schools in fulfilling this role. There is very strong collaborative working between the Council and schools. We ensure that governors take safeguarding seriously and are up to date with their training, and also support schools in investigating allegations against staff through the Local Authority Designated Officer (LADO). Radicalisation and the Prevent programme have been an increasing focus over the last year, with particular concerns raised in relation to independent schools, where there has been little joint working with the council historically. In response to this, the council has offered these schools support and built some positive relationships, but there is more work to do. There is also concern about children who are home educated but not registered with the council.

Our Community Safety services support the safeguarding agenda in several ways. The MARAC is a good example of the work they do to support multi-agency responses to safeguarding issues, and this was inspected recently resulting in a good rating. Our Tower Hamlets Enforcement Officers (THEOs) have been trained in safeguarding and violence against women and girls to ensure that they are aware of how to spot safeguarding issues, and what to do in response.

The council's Housing services are also represented on the Board. One of the main risks currently being addressed is the implications of welfare reform, leading to homeless families being placed outside the borough, sometimes in bed and breakfast accommodation.

The council has in place rigorous scrutiny and challenge processes. Specifically in relation to safeguarding, there is a Corporate Management Team safeguarding group on which the Chief Executive and corporate directors sit. In addition, the Corporate Parenting Steering Group, which is chaired by the lead member for children, ensures that safeguarding issues are robustly addressed. The Chief Executive and Director of Children's Services (DCS) meets with the LSCB Chair regularly to ensure that challenge from the Board is taken forward through council's services. Our current challenges in relation to safeguarding are reflected in our update above i.e. ensuring that

we are able to effectively support and intervene to safeguard children in independent schools, and those that are home educated.

Public Health does not provide frontline services, working instead at a strategic level: conducting needs assessments, facilitating partnerships, commissioning services, monitoring and evaluating service delivery and supporting workforce development.

Key areas of work during 2015/16 related to safeguarding children include:

Development of a new service specification for the Health Visiting service was informed by an in depth stakeholder engagement process (January – May 2015) as well as recommendations from the Jamila SCR. This is in respect to the identification of risk and provision of more intensive support, monitoring where risks are identified that do not meet the threshold for referral to children's social care. The new service specification incorporates a locality model and aims to improve integration with Children's Centres, while maintaining close links with primary health care, to improve access to services, early identification of need, safeguarding risks and coordination for onward referral where additional needs or risks are identified.

Following transfer of commissioning responsibility for 0-5 public health services (Health Visiting service and Family Nurse Partnership) from NHS England to the local authority on 1st October 2015, both services were re-procured, using new localised service specifications, and contracts awarded to new service providers on 1st April 2016. We are now in the process of mobilising the new contracts and supporting the implementation of the new service specifications. As chair of the Family Nurse Partnership (FNP) Advisory Board we have broadened stakeholder involvement by increasing membership to include housing and children's social care.

Following joint work with the CCG, Children's Services and service providers in 2014/15 on the development of an outcomes framework for CAMHS, during 2015/16 we have been working with the CCG on the development of a mental health and wellbeing outcomes framework for Universal Services (including Health Visiting, School Health, Early Years services and Education) that will help to assess the contribution of wider services to prevention and mental health promotion.

We have developed an evaluation framework for the pilot parent and infant wellbeing project 'Better Beginnings' that is training peer supporters to support parents and carers during pregnancy and the first year of the child's life to promote secure early attachment and emotional wellbeing and to identify those needing more specialist support.

As the commissioner of the service, Public Health is supporting the School Health service in setting up arrangements to pilot School Nurses undertaking LAC reviews in community settings.

Public Health leads on the work of the Child Death Overview Panel (CDOP), including ensuring implementation of recommendations and dissemination of learning points. As part of this work, educational messages for front line staff and parents arising from CDOP recommendations have been cascaded through maternity and early years settings. Messages this year have included management of fever in the child and child safety messages.

We have contributed to the Children's Services working group developing a proposal for an 'Early Help front door' to provide a universal contact point for information and advice and pathway to initial assessment and onward referral.

We have led on the development of proposals for integrated early years services for the Tower Hamlets Together (formerly known as Vanguard) programme and co-chair the THT Children's Steering group. One of the priorities is to develop an integrated model to support mental and emotional health and wellbeing across all service tiers, starting with and building on universal services. This work will also take forward the integration of health visiting and other health services into Children Centres.

During 2015/16 we have updated the JSNA factsheets for Safeguarding Children and Looked After Children which can be found on the [council website](#).

4.2 NHS England (London)

NHS England is responsible for the assurance of CCGs and direct commissioning of independent contractors and specialised commissioning. Since the changes to the commissioning system, NHS England (London) has worked hard to ensure that quality of commissioning in relation to child safeguarding remains robust. This has included hosting the named GP role.

There is a clear assurance process and evidence in relation to the authorisation and ongoing assurance of CCGs of which safeguarding has been a part. There is a London wide safeguarding work plan in place.

Through the work plan we have aimed to improve systems and processes within NHS England (London) and the wider system. In relation to THSCBs the major challenge has been attendance by NHS England due to capacity issues.

4.3 Tower Hamlets Clinical Commissioning Group (CCG)

As a commissioning agency the CCG continually reviews the safeguarding arrangements of the providers we commission. Included within this are regular quality and performance reviews. Within the CCG safeguarding is at the heart of commissioning decisions where the CCG works to ensure safeguarding children is central to our plans and that we have effective processes in place to respond to national and local policy, any lessons learnt from serious case reviews/other learning reviews and Serious Incidents within Health and any safeguarding children challenges the NHS faces through the new landscape of multiple providers.

The following areas are the highlight of our activity in the report year:

The LSCB undertook a Section 11, Children Act 2004 audit of all partners, the CCG completed this audit and identified the following areas for actioning:

- TH CCG to develop a full response to the NHS England deep dive of safeguarding
- Develop a child friendly complaints information
- Ensure a generic statement for safeguarding children is in CCG job descriptions
- Ensure external safeguarding supervision for Designated Professionals (Doctor)
- Transformation Team will re-visit families surveyed as part of virtual ward project
- The CCG will put in place an integrated engagement policy for children and young people and commissioning
- CCG will hold providers to account on the requirement to consider the views and wishes of CYP they work with
- Formalise the induction programme for CCG to ensure safeguarding children is covered
- CCG to ensure Prevent leads are trained to required standard and have a number of WRAP trained trainers
- Ensure CCG oversight of safeguarding training is robust and improve CCG coverage
- CCG to take action to improve information governance across the children’s partnership and to develop a plan to escalate breeches

NHS England deep dive into ‘Safeguarding’

NHS England conducted a deep dive review of safeguarding in order to obtain a full and thorough view of Children’s and Adult’s safeguarding as part of the assurance of CCGs in 2015/16. The deep dive considered the well led component of assurance as well as the performance component, utilising the Safeguarding Accountability and Assurance Framework.

Tower Hamlets CCG Safeguarding Deep Dive Overall Findings

Safeguarding Deep Dive Review Components	Outcome
Governance /Systems/ Processes	Assured as Good
Workforce	Assured as Good
Capacity levels in CCG	Assured as Good
Assurance	Assured as Good

Training and support to General Practice

Via the Designated Professionals and Named GP the CCG have:

- Clarified level 3 specialist Safeguarding training requirements with providers and GPs
- Delivered Safeguarding specialist training for primary care linked to LSCB priorities
- Worked with Barts Health and GPs on a policy for management bruising in non-mobile babies in Primary and Secondary Care following a Serious Incident

Assessing the quality and depth of safeguarding arrangements within providers

The CCG routinely conduct 'Quality Visits' into the Health providers' service areas, in addition to these 'generic' visits the CCG also conduct safeguarding children specific 'Quality Visits' in response to safeguarding children related Serious Incidents or based on other intelligence which may indicate a concern.

The CCG conducted Safeguarding Quality Visits on the following:

- Paediatric A&E
- Radiology
- Paediatric outpatients

These visits raised the following issues:

1. Lack of Service specific safeguarding updates and access to external safeguarding training
2. The quality of the information received in relation to Non-Accidental Injury (NAI) cases (some cases lacked full history of concern.
3. Staff not keeping up-to-date with current national safeguarding agenda
4. Seeking the views of children and young people using the department; some departments reported the current trust method was not suitable for their department needs and are waiting to move from the Friends and Family Test (FFT) to 'I want great care' (iWGC)
5. Lack of access to the Child Protection–Information Sharing (CP-IS) due to non-compatible IT
6. Improving the Police liaison pathway with A&E (A&E spoke of an ad hoc relationship with the police when at the level of a constable, a more permanent arrangement with a identified officer with safeguarding expertise would improve this)
7. Increasing the capacity of key roles (A&E). The capacity of the A&E liaison role had reduced over the years when through put has increased, there is also a lack of senior medical cover at weekends
9. Front line teams not linking to the wider safeguarding governance structures
10. Lack of knowledge of and implementation of the Chaperone Policy

The CCG Safeguarding Children and Commissioning Group continues to be the forum to ensure safeguarding arrangements improve within the CCG and across the whole health economy. This group meets bi-monthly. The membership of this group held an away day in June 2015 where we reviewed

our risks and priorities and ensured alignment with the LSCB priorities, out of this the following priority areas were identified and informed the CCG safeguarding children work plan:

1. How to ensure safeguarding is embedded in all commissioning of services
2. Reviewing out of borough placements for LAC including:
 - The potential for high cost invoices to be paid by the CCG
 - How to monitor the on-going health issues beyond the health review, such as Mental Health and any physical disabilities
3. Review the provision for services for the vulnerable cohorts:
 - LAC
 - Children with disabilities
 - Vulnerable patients with mental health issues
 - Carers for children
 - CSE/harm prevention/FGM
 - Children excluded from school
4. Assess the CCG against the LSCB priorities
5. Responding to SCR's/Review
6. Reviewing safeguarding children's quality/KPI dashboard/accountability arrangements
7. Provider representation at the safeguarding committee meetings in order to seek assurance
8. Ensuring that safeguarding is embedded within primary care
9. Ensuring that we are engaging children and young people as service users

In addition the CCG through this group have:

- Revised the commissioning and procurement processes to ensure safeguarding aspects are built into the process from start to finish whether services are being commissioned or re-commissioned.
- Ensured oversight of all safeguarding children Serious Incidents (SIs), scrutinised the quality of these ensuing investigations and raised cases which have become SCRs for the LSCB as potential SCRs.
- Revised CCG policies to reflect changes in Working Together guidance
- Invited providers to attend the group to discuss their performance dashboard submissions.
- Monitored Barts Health in relation to CQC compliance and reported to the LSCB.
- Raised issues of not using secure email and compliance with consent when information sharing across LSCB partnership
- Assessed the implementation of chaperone policy in providers following the 2015 Bradbury enquiry in Cambridge.

Tower Hamlets CCG and its Looked After Children responsibilities

The CCG LAC Designated Professionals have attended meetings with Local authority colleagues in order to highlight and offer professional support for all LAC, and ensuring the health agenda is being met. Working in partnership has been shown to highlight the support for the LAC in ensuring that the LAC's health and wellbeing are kept in focus.

We have a Health Team who attend the LAC TRAC (case monitoring) meetings on a monthly basis. They are able to give the health and the commissioning perspective for the Looked After Children who are having their case reviewed with the Service Head Children's Social Care and the other professionals so this prevents 'drift' in cases which are seen as 'difficult'.

The providers have worked with the Children in Care Council to develop "Health passports" so that all young people preparing to leave care have access to essential information about their health. Funded by the CCG and promoted via a launch with Social Workers and promoted these passports along with the benefits.

We refined the dataset in consultation with the Children in Care Council to ensure that we were scrutinising aspects of their care, wellbeing and outcomes that were important to them.

We are attending the Tower Hamlets Corporate Parenting Board as full members and we are able to give the health perspective of the Looked After Child to the Councillors and other Board Members.

In order to quality assure the health assessments, we have developed a system whereby all health assessments carried out by outside agencies on our behalf for Tower Hamlets children and young people will be quality assured by the Designated Nurse in the CCG, and a dip sample of those carried out by our Provider LAC Nurses will also be scrutinised monthly for quality and thoughtfulness of the journey for the child.

New work streams are being looked at for CAMHS, Dental Health Assessments and the general Initial and Review Health Assessment pathways to streamline these processes to work better with the LAC child/young person and to enable a better child's pathway/journey.

The LAC Health Providers are required to monitor their responsiveness to requests for statutory health assessment from the Local Authority.

Performance is reported quarterly against Key Performance Indicators.

4.4 Barts NHS Trust

A strategic and operational safeguarding children governance structure is in place at Barts Health NHS Trust. The Barts Health integrated safeguarding assurance committee (ISAC) is chaired by the deputy chief nurse and monitors assurance and compliance by exception reporting from the hospital site safeguarding children committees. This committee reports to the Trust Quality

and Safety Committee, which is a sub-committee of the Trust Board. An annual board report is presented to the executive team.

The ISAC committee monitors key indicators for safeguarding children via the safeguarding children dashboard. There is representation at senior level from across the organisation. The hospital site safeguarding children committees are chaired by the hospital Directors of Nursing.

Following the 2015 CQC inspections of Barts Health hospitals, an external review of safeguarding children and adult's processes and governance was undertaken. The actions from this review are being embedded throughout the organisation and reported to the LSCB.

Royal London Hospital and Tower Hamlets Children's Community Health Services completed the Section 11 audit in January 2016 and through the challenge session a number of actions were agreed.

Training and supervision compliance, as specified in the Intercollegiate Document (2015) are monitored closely. The Royal London Hospital has had a number of quality assurance visits, from THCCG during the last year; this has included The Children's Hospital, radiology and Emergency Department. More are planned and learning from these events is being implemented.

4.5 Child and Adolescent Mental Health Service (CAMHS)

There have been a number of developments on the safeguarding agenda over the last year. Those developments have been driven by a number of factors, of which a few are listed below:

- Tower Hamlets Transformation Plan October 2015/Commissioners
- 2016-2019 Tower Hamlets Children and Families Plan/Family Wellbeing Model
- Learning from Tower Hamlets LSCB Serious Case Reviews and other reviews
- National/local reviews/strategies, e.g. Goddard Review, Violence against women and girls etc.
- CQC inspection 2016

Child and Adolescent Mental Health Service in Social Work Team

The Tower Hamlets Transformation Plan encourages partnerships between organisations in general. In addition, children's social care's organisational/financial review have led to the integration and co-location of specialist CAMHS into children's social care. Five clinicians from Tower Hamlets CAMHS will be integrated into children's social care from April 2016. All referrals of Children in Need, subject to a child protection plan and looked after children will undergo consultation with possible brief CAMHS intervention prior to case allocation. This will improve multi-agency planning for the child and ensure their therapeutic needs are embedded in this process.

Conduct/Forensic/Sexually Harmful Behaviour (SHB)

A number of serious and critical incidents have occurred in recent years involving homicides and suicides. A special interagency conduct network to target young men involved with youth crime, YOT, challenging behaviour and gangs was launched in September 2015, involving Specialist CAMHS, YOT, Pupil Referral Units, Special Schools and third sector services.

All PRUs and special schools now have embedded CAMHS workers.

A new Emotional & Behavioural Group focussing on externalising disorders has been set up and Forensic Pathway and a multiagency pathway for children who exhibit sexually harmful behaviour is currently being developed.

Child sexual abuse (CSA) and child sexual exploitation (CSE)

Following the 'Review of pathway following sexual assault for children and young people in London', conducted by the Havens and King's College Hospital London (Goddard et al., March 2015), a North East London steering group was set up in order to design and implement the new pathway for children and young people across NE London. An audit of CSA cases held in Tower Hamlets CAMHS is currently under way. CAMHS is represented on the Multiagency Panel for Sexual Exploitation (MASE) and participate in case planning, intervention and support provisions.

Parent training

CAMHS is represented on the Corporate Parenting Steering Group (CPSG). In addition to the parenting programme offered by the local authority's Parental Engagement Team, Tower Hamlets CAMHS has established a new parent training group in autumn 2015, based on the Non-Violent-Resistance (NVR) approach.

The last year saw significant capacity pressures caused by extraneous factors. These were the destabilising effects of a number of maternity leaves, Children and young people's Improving Access to Psychological Therapies (IAPT) secondments, the transferring of 5 social workers to CSC, the withdrawal of £200k funding, an increase in the rate of referrals, and backfill recruitment drag. Despite these cumulative effects we have managed to achieve a 5 week plus or minus waiting time for routine referrals, and we are continuing with our modernisation and quality improvement plans. ELFT in East London underwent a CQC inspection week beginning 13/6 and TH CAMHS was visited on 16/6. Key KPI trends continue to be positive but DNA's still present a challenge (16% in Q4).

4.6 London Ambulance Service (LAS)

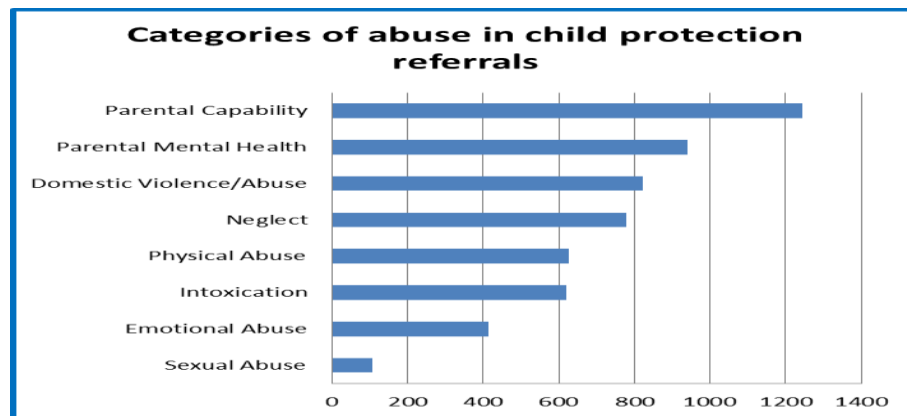
The London Ambulance Service NHS Trust (LAS) has a duty to ensure the safeguarding of vulnerable persons remains a focal point within the organization and the Trust is committed to ensuring all persons within London are protected at all times.

This report provides evidence of the LAS commitment to effective safeguarding measures during 2015/16. A full report along with assurance documents can be found on the Trusts website.

Referrals or concerns raised to local authority during 2015-16

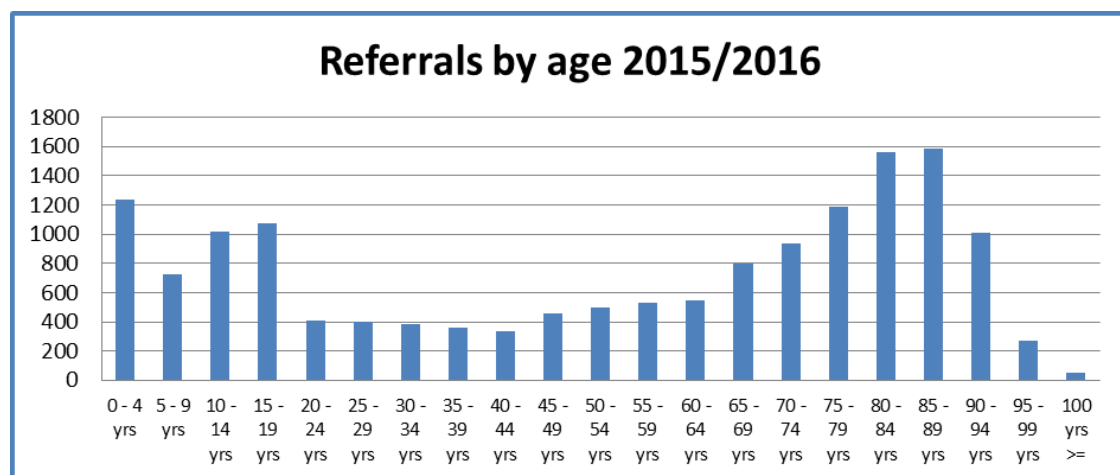
- The LAS made a total to 17332 referrals to local authorities in London during the year.
- 4561 children referrals, 4331 Adult Safeguarding Concerns, 8440 Adult welfare Concerns

Categories of abuse



Referrals by age

Perhaps not surprisingly, the very young and the old are most likely to be the subject of referrals. For children, once out of infancy and their most vulnerable period they are most likely to be the subject of a referral once over 15. Around a third of referrals for all children, according to an in-house audit conducted in Q1 of this year are related to self-harm. The majority of these are in the 15-18 age range.



Safeguarding Training

The Trust is committed to ensuring all staff are compliant with safeguarding training requirements. This includes staff directly employed by the LAS as well as voluntary responders and private providers who we contract to work on our behalf.

The following training plan is in place:

- Emergency Operations Control (EOC) staff have safeguarding training planned for quarter 1 2016-17.
- Patient Transport Staff (PTS) will also receiving safeguarding training in quarter 1-2 2016.
- Temporary staff position is currently under review by LAS Executive Leadership Team.
- Trust Board training is arranged for May 2016 for those outstanding safeguarding training.
- All non-clinical staff will undertake Prevent awareness training in 2016.

The LAS full safeguarding report for 2015-16 can be accessed via the [Trusts Website](#).

4.7 Metropolitan Police – Sexual Offence, Exploitation and Child Abuse Command (SCO17)

The Metropolitan Police Service (MPS) has a dedicated Sexual Offences, Exploitation, Child Abuse Command (SOECAC). The Child Abuse Investigation Team (CAIT) functions are crime prevention, crime detection & to provide risk assessments. Whatever the function, *'the welfare of the child is paramount'* is always the primary consideration in any decision or action undertaken.

All allegations of crime within the scope of 'child abuse' (victims under 18) are recorded & investigated in co-operation with Local Authorities and other appropriate agencies.

Intra-familial abuse - This includes family and extended family defined as aunts; uncles; cousins; siblings including step, fostered, half brother and sister, grandparents, step grandparents, step mothers/fathers, long term partners in established relationships.

Professional abuse - Working in a child focused environment who abuse paid positions (e.g: teachers; sports coaches; youth workers; ministers; caretaker of a school; school cleaner; prison staff).

Other carers - Act as a carer with some responsibility for a child at the time of the offence (e.g: babysitters; voluntary groups like scouting, unpaid sports coaches, close personal family friends).

Non recent allegations - Adult victims if the abuse occurred whilst a child (under the circumstances described above).

Parental Abduction - Outlined in Section 1, Child Abduction Act 1984.

SUDI investigations - Sudden Unexpected Death in Infancy (children under 2 years old).

Review of Safeguarding Activity

CAIT attend the strategic Local Safeguarding Children Board and various subgroups. CAIT has strong working relationships with other safeguarding

partnership agencies. They also have a dedicated team of Police Staff deployed to represent the MPS at child protection case conferences and to produce reports for them.

CAIT has a dedicated Partnership Team which is centrally based that visits schools, agency professionals, faith groups and community groups. Their aim is to inform, educate and engage with hard to reach communities. This ensures the wider community are aware of legislation regarding issues such as FGM & forced marriage and further seek to prevent these crimes occurring.

The Continuous Improvement Team & Professional Standards Champion continues to evaluate the Command's contact with children, parents & carers to inform best practice and service delivery. Listening to children culminated in every MPS interview suite being upgraded in regards to the equipment installed and being furnished in a child friendly way. All suites now minimise any anxiety experienced by young people whilst furnishing their evidence & also optimise the quality of evidence recorded.

Police have implemented Operation Limelight involving officers from CAIT, aviation & security, and Border Agency staff. This is to tackle the emerging prevalence of FGM. Staff engage with passengers travelling to & from countries with a high incidence & culture of FGM. This is to target suspects involved in this practice, protect children at risk and to raise FGM awareness.

All investigations are subject to risk assessments with comprehensive research conducted. This ensures any direct or potential risk to children can be managed and strategies implemented.

CAIT tailors its response from any learning disseminated from local & national Serious Case Reviews. All relevant agencies engage in these reviews which ensure agencies' priorities and procedures are adapted when necessary.

Tower Hamlets CAIT are set MPS key performance indicators to prioritise safeguarding as core to their business. The figures below relate to Tower Hamlets, Hackney & Newham as this is a brigaded team.

1st April 2015 to 31st March 2016

	Offences	Detections
All Offences	1520	288 (19.0%)
Rape	71	13 (18.3%)
Other Serious Sexual Offences	144	23 (16.0%)
Violence with Injury	101	45 (44.6%)
Neglect	282	86 (30.5%)
<ul style="list-style-type: none"> ▪ The crimes not listed above include less impact offences such as common assaults and other crime related incidents. ▪ Initial Child Protection Case Conferences - 91% attended. ▪ Strategy Discussions - 1650 of which 961 were conducted within 24 hrs (58.2%) 		

A further 51 offences resulted in Community Resolutions being administered as positive outcomes, which increased the overall detection rate to **22.3%**

The Detection rate for all offences and individual offences exceeded the targets set.

Priorities and targets are set for all pan London CAITs to ensure children are protected and safeguarded. These are centred on detection rates, adhering to the Victim's Code of Practice, strategy discussions, case conference attendance & acquiring Sexual Harm Prevention Orders.

Senior officers and front line staff are regularly held to account regarding these objectives. This occurs on a daily basis and is cemented by formal meetings. A challenge continues to be acquiring additional staff to cater for the year on year rise in reported offences.

4.8 Metropolitan Police – Borough Public Protection Unit (BOCU)

Tower Hamlets police is committed to working with our partners in order to prevent crime and protect vulnerable people. At both the strategic and operational levels we are active members of numerous multi-agency forums in the borough, of which the Safeguarding Children Board is one. Others include the Violence against Women and Girls and Multi-agency Sexual Exploitation panels, the latter of which is co-chaired between the police and children's social care. The LSCB itself is well-supported at senior level, with the Borough Commander sitting on the Board and Executive Group.

Tower Hamlets police play an integral role in the partnership response to child sexual exploitation, missing children, prevent and radicalisation as well as domestic violence, wider child protection and other safeguarding issues. We take our safeguarding responsibilities seriously, and have invested in a dedicated CSE team, Missing Persons Unit, MASH and Prevent / Counter terrorism capability, and a well-resourced Community Safety Unit. The links between missing from home, missing education, domestic abuse, CSE and gangs are recognised, and our officers work closely across units to provide a holistic response. The borough has also recently created the post of Youth Inspector, bringing Schools Officers, the Youth Offending and Gangs teams under one umbrella, in recognition of the challenges facing our young people and the need to help them to make the right choices. Serious Youth Violence remains a significant concern, and our Youth Inspector is currently exploring opportunities with both statutory and non-statutory partners, including the voluntary sector, to identify, educate, support and where necessary divert the most vulnerable groups and individuals.

Our teams have forged strong relationships with Children's Social Care and other partners, and take pride in delivering a high quality service.

We have had a number of successes in the past year, which include:

- Positive interventions in over 30 child sexual exploitation cases and the disruption of perpetrators, including a recent charge of grooming and sexual activity with a child
- Operation Forks. A proactive investigation into CSE activities at a shisha bar where we were able to obtain evidence for a closure notice and as a result the premise was closed down.
- The ongoing roll out of Operation Makesafe, including to children's homes and youth clubs
- An 8% reduction in knife crime offences (financial year to date) compared to 2014-15.

Our core priorities for next year are:

- Violence including Domestic Abuse
- Anti-Social Behaviour
- Safeguarding and Child Sexual Exploitation
- Terrorism

The borough's performance is subject to regular internal scrutiny, with senior officers held to account. The Metropolitan Police Service has also recently undergone an inspection by HMIC in relation to child safeguarding. The full results of that inspection await. Tower Hamlets police will act upon any learning identified, with a view to continuous improvement.

4.9 Voluntary Sector

The Voluntary Sector working with children, young people and their families in Tower Hamlets comprises hundreds of organisations; 260 of which are members of the Voluntary Sector Children and Youth Forum (VSCYF), a network hosted by Volunteer Centre Tower Hamlets.

The LSCB and VSCYF continued to promote the national Safe Network Standards and the self-assessment audit tool as a useful resource for the voluntary sector. It sets the standards for this sector to operate safely and is section 11, Children Act compliant. The Voluntary Sector Children and Youth Forum Coordinator supported 7 organisations to audit their safeguarding policies and procedures and ensure they are up-to-date and suitable for the activities the organisations provide.

A training course was held for voluntary sector organisations which focused on writing policies and procedures and safeguarding tools. Workshops on Preventing Violent Extremism and Radicalisation, e-safety and the Family Wellbeing Model were held as part of a rolling programme of themed workshops for the voluntary sector.

The voluntary sector organisations that have completed Safe Network audits and training workshops have reported that they have more robust procedures in place that ensure that they can take appropriate actions to keep children and young people safe. They have improved systems and communication and

have therefore found that their members of staff and volunteers are much better informed and confident when it comes to safeguarding matters, are more aware in terms of safer recruitment, and vigilant in managing everyday behavioural issues with children and young people. As a result, their support to children and young people when a safeguarding issue arises is timely, sensitive and appropriate.

Awareness of safeguarding, in particular LSCB priority areas, has been raised through eBulletins, emails, VSCYF meetings and workshops. Support or resources on keeping children and young people safe against extremism and radicalisation, Preventing Gang and Youth Violence: Spotting Signals of Risk and Supporting Children and Young People, Working effectively to address Child Sexual Exploitation, Safeguarding for Trustees Road Safety Week 2015, National Burn Awareness Day, Disqualification by Association and DBS updates on ID and overseas applicants have been disseminated, alongside information on Tower Hamlets' Local Safeguarding Children Board's website and findings from Serious Case Reviews. This has been supported by the LSCB Chair attending Voluntary sector forum meetings to discuss safeguarding priorities.

This promotion of information and resources communicates a continued need to keep safeguarding high on organisations' agenda, enabling them to promote an ethos of support to children and young people whilst providing a swift response where needed.

5. Section 5: Priorities for 2016-2017

The LSCB held a development session in February 2016 to reflect and share learning from 2015/16 and to plan for 2016/17. Partners heard from each other about challenges and priorities for the coming year and the Chair of the Learning and Workforce Development sub-group led a session on systemic learning and double-loop learning.

Looking forward to 2016/17 and beyond, all agencies continue to be subject to diminishing resources, budget cuts and reorganisation. However, at a time of significant change, the LSCB acknowledges that our challenges can also be an opportunity to look at and improve our local safeguarding arrangements. Despite reductions in funding we want our children to continue to be kept safe and their families supported across the safeguarding continuum.

The Children and Families Plan (2016-19) was also developed during the year and this involved consultation led by the Children and Families Partnership with the LSCB and other key stakeholders. The new plan sets out how families will be supported over the next three years and the LSCB will take forward the priorities in the 'Free from Harm' section as part of its core business.

Our priorities for 2016/17 are:

Priority 1	• Early Help and Early Identification
Priority 2	• Radicalisation and Extremism
Priority 3	• Child Sexual Exploitation and Missing Children

We have identified fewer priorities this year compared to previous years, but these three priorities are the areas we want to focus our attention on in the coming year and make a real difference. All LSCB partner agencies are signed up to these three priorities.

In conjunction with the sub-group chairs a comprehensive work plan will be developed against the above priorities, incorporated in to the overarching THSCB business plan and delivered in partnership with key agency leads across the local authority, health, education, police, voluntary sector, lay members and others.

We will report what we have achieved, what we need to improve and the difference we made to the lives of children, young people and their families in next year's THSCB annual report.

Appendix 1 – LSCB Board Membership (correct as of 31.03.16)

NAME	ROLE	CONTACT
Alex Nelson	Voluntary Sector Children & Youth Forum Coordinator	alex@vcth.org.uk
Alexandra Law	Nursery School Heads Forum Rep (Harry Roberts Nursery)	head@harryroberts.towerhamlets.sch.uk
Borough Commander	Borough Commander, Met Police Tower Hamlets Deputy rep	Simon.dilkes@met.pnn.police.uk
Andy Bamber	Service Head - Safer Communities – LBTH	Andy.bamber@towerhamlets.gov.uk
Shahzia Ghani	Deputy rep	Shahzia.ghani@towerhamlets.gov.uk
Ann Roach	Service Manager, Child Protection & Reviewing - LBTH	Ann.roach@towerhamlets.gov.uk
Anthony Walters	Transformation Manager & QA& P Subgroup Chair - LBTH	Anthony.walters@towerhamlets.gov.uk
Cathy Smith	Secondary School Heads Rep (Bow Secondary School)	smithc@bow-school.org.uk
Chris Hahn	Interim Named Nurse for Safeguarding Children - BHT	Christopher.hahn@bartshealth.nhs.uk
Claire Belgard	Interim Service Head – Youth & Community Service – LBTH	Claire.belgard@towerhamlets.gov.uk
Hasan Faruq	Deputy Rep	Hasan.faruq@towerhamlets.gov.uk
Clare Hughes	Lead Named Nurse for Safeguarding Children - BHT	Clare.hughes@bartshealth.nhs.uk
Cllr Rachael Saunders	Lead Member for Children's Services	rachael.saunders@towerhamlets.gov.uk
Debbie Jones	Corporate Director, Children's Services – LBTH	debbie.jones@towerhamlets.gov.uk
Diane Roome	Lay Member	-/-
Emma Tukmachi (Dr)	GP Representative Tower Hamlets CCG	emmatukmachi@nhs.net
Esther Trenchard- Mabere	Associate Director of Public Health	Esther.trenchard-mabere@towerhamlets.gov.uk
Hanspeter Dorner	ELFT CAMHS Rep	Hanspeter.dorner@elft.nhs.uk
Hanspeter Dorner	Deputy Rep	hanspeter.dorner@elft.nhs.uk
Jackie Odunoye	Service Head, Housing & RSL Rep	Jackie.odunoye@towerhamlets.gov.uk
Jan Pearson	Associate Director for Safeguarding Children - ELFT	Jan.pearson@elft.nhs.uk

NAME	ROLE	CONTACT
Julia Hale (Dr)	Designated Doctor, Tower Hamlets CCG	julia.hale@bartshealth.nhs.uk
Keith Paterson (DCI)	Met Police Service – Child Abuse Investigation Team	keith.paterson@met.police.uk
Layla Richards	Service Manager Policy, Programmes & Community Insight - LBTH	layla.richards@towerhamlets.gov.uk
Lucy Marks	Chief Executive Compass Wellbeing CIC	Lucy.marks@nhs.net
Douglas Charlton	Head of Stakeholder & Partnerships Community Rehabilitation Company (London)	Douglas.charlton@london.probation.gsi.gov.uk
Maggie Buckell	Tower Hamlets CCG Rep	Maggie.buckell@towerhamletsccg.nhs.uk
Archna Mathur	Deputy Rep	Archna.mathur@towerhamletsccg.nhs.uk
Marian Moore	Service Manager for Tower Hamlets, NSPCC	Marian.moore@nspcc.org.uk
Nasima Patel	Service Head – CSC, LBTH	nasima.patel@towerhamlets.gov.uk
Neherun Nessa Ali	Lay Member	-/-
Nick Steward	Director of Student Services Tower Hamlets College	Nick.steward@tower.ac.uk
Nikki Bradley, MBE	Service Manager, YOS and Family Interventions/Troubled Families LBTH	Nikki.bradley@towerhamlets.gov.uk
Rob Mills	Nurse Consultant for Safeguarding Children & Designated Nurse, Tower Hamlets CCG	rob.mills@towerhamletsccg.nhs.uk
Sandra Reading	Director of Midwifery & Nursing (RLH), Barts Health NHS Trust	sandra.reading@bartshealth.nhs.uk
Mike Hirst	Primary School Heads Forum Rep (Seven Mills)	head@sevenmills.towerhamlets.sch.uk
Sarah Baker	Independent LSCB Chair	sarah.baker@towerhamlets.gov.uk
Stuart Webber	Head of Safeguarding Hackney, City of London and Tower Hamlets National Probation Service	Stuart.Webber@probation.gsi.gov.uk
Phyllis Dyer	CAFCASS Rep Head of Service for London Public Law	Phyllis.dyer@cafcass.gsi.gov.uk
Sarah Williams	Legal Services – LBTH	sarah.williams@towerhamlets.gov.uk

NAME	ROLE	CONTACT
Terry Parkin	Interim Service Head, Learning & Achievement - LBTH	terry.parkin@towerhamlets.gov.uk
Tom Strannix	Voluntary Sector Representative – Manager, Place2Be	Tom.strannix@place2be.org.uk
Tracey Upex	Deputy Borough Director – Tower Hamlets, ELFT	tracey.upex@elft.nhs.uk
Vanessa Lodge	NHS England (London) Representative	vlodge@nhs.net
Will Tuckley	Chief Executive - LBTH	Will.tuckley@towerhamlets.gov.uk

Appendix 2 - Terms of Reference for the Tower Hamlets Local Safeguarding Children Board

October 2011 (updated August 2015)

Overall purpose

The Local Safeguarding Children Board (LSCB) established through the Children Act 2004 Section 14.1, is a statutory mechanism for agreeing how the relevant organisations in each local area will co-operate to safeguard and promote the welfare of children, and for ensuring the effectiveness of what they do.

Working Together to Safeguard Children, Chapter 3 (DfE 2015), sets out in detail guidance for LSCBs and their member organisations to follow regarding their role, functions, governance and operational arrangements. The LSCB should coordinate what is done by each person or body represented on the Board and ensure the effectiveness of work undertaken by member organisations through a variety of mechanisms including peer review, self-evaluation, performance indicators and joint audit.

The broad scope of the LSCB is to address:

- Activity that affects all children and aims to identify and prevent maltreatment or impairment of health or development, and ensure children are growing up in circumstances consistent with safe and effective care
- Proactive work that aims to target particular groups
- Responsive work to protect children who are suffering, or likely to suffer, significant harm

Budgets responsible for

To function effectively, the LSCB needs to be supported by its member organisations with adequate and reliable resources*. The LSCB budget is funded by contributions made by the Police, Health Agencies (Community, Acute and Mental Health), Probation, CAFCASS, Children's Social Care and Local Authority other. It is the expectation that the majority of funds will be provided by these core partners. The LSCB budget and the statutory contribution** (s15, CA04) made by each member organisation should be reviewed and agreed on an annual basis at the end of the financial year by the Independent LSCB Chair and the LSCB Partners Group.

* *Working Together 2015 states the financial burden of supporting the LSCB to deliver its core functions should not fall on a small number of partner agencies (chapter 13, para 19)*

** *Contribution is considered to be financial payments towards expenditure incurred or in kind through the provision of staff, goods or services.*

Legal Agreements

The LSCB may request personal or other information subject to the Data Protection Act. Currently, Tower Hamlets' LSCB adheres to the scope outlined in the *Information Sharing Guidance for Practitioners and Managers* (DCSF 2015), the North East London Information Sharing Protocols and local MASH Information Sharing Protocol.

Information sharing with the LSCB has been strengthened with the passage of the Children and Families Bill, which makes provisions for compliance with LSCB requests for 'appropriate' information to be disclosed in order to assist it in the exercise of its functions (*ref: Working Together 2015, Chapter 3, Paragraph 22*)

LSCB is accountable to

Tower Hamlets' LSCB is accountable for its work to

- The local community
- Constituent agencies
- Overview and Scrutiny Committee
- Secretary of State

Who is accountable to the LSCB?

The following are accountable to the LSCB in relation to the discharge of responsibilities in safeguarding children:

- Children and Families Partnership (in relation to safeguarding activity)
- Health and Wellbeing Board
- MARAC
- MAPPA
- LSCB Partners Group
- LSCB Subgroups:
 - Child Death Overview Panel
 - Case Review / Serious Case Review
 - Performance & Quality Assurance
 - Learning & Development
 - Awareness Raising & Engaging Communities
 - Child Sexual Exploitation

LSCB Core Functions:

The core functions of an LSCB are set out in regulations and are:

- Developing policies and procedures for safeguarding and promoting the welfare of children, including those on:
 - action taken where there are concerns about the safety and welfare of a child, including thresholds for intervention;
 - training of people who work with children or in services affecting the safety and welfare of children;
 - recruitment and supervision of people who work with children;
 - investigation of allegations concerning people who work with children;
 - safety and welfare of children who are privately fostered;
 - co-operation with neighbouring children's services authorities (i.e. local authorities) and their LSCB partners;
- Communicating and raising awareness;
- Monitoring and evaluation;
- Participating in planning and commissioning;
- Reviewing the deaths of all children in their areas; and
- Undertaking Serious Case Reviews

Additional LSCB Tasks:

- To audit and evaluate the effectiveness of local services in protecting and promoting the welfare of children
- To establish standards and performance indicators for the protection of children as required by DfE and within the framework set out in the Children and Young People's Plan
- To encourage and support the development of cooperative working relationships and mutual understanding between agencies and professionals with responsibilities for the welfare and protection of children as identified with the London Child Protection Procedures and the THIS Child
- Participate in the local planning and commissioning of children's services to ensure that they take safeguarding and promoting the welfare of children into account
- To use knowledge gained from research and national and local experience to develop and improve practice and service delivery and to ensure that lessons learned are shared, understood and acted on
- To raise awareness within the wider community of the need to safeguard children prevent harm and explain how the community can contribute to these objectives
- To ensure that single agency and multi-agency training on safeguarding and promoting welfare is provided in order to meet local needs. This covers both training provided by single agency to their staff and multi-agency training where staff from more than one agency train together.

Decision-Making Powers

The LSCB Main Board, consisting of its entire member organisation holds the final mandating authority and will be sought to make key local decisions relating to safeguarding and protection of children.

Outputs

There may be some exceptions, but outputs should include:

- LSCB Annual Review
- Multi-agency case and thematic audits
- Bi-annual Section 11 audits
- Annual Safeguarding Conference
- Annual Budget
- Annual Awareness Raising Campaign

Membership

The LSCB Membership is reviewed annually (see Appendix 1 for full list).

Expectation of Chair and Members

Chair

The Chair is responsible for providing effective leadership of the Board. He/she has a crucial role in securing an independent voice for the LSCB and should have the confidence of all partners.

The Chair and members of the Board are expected to:

- Read papers in advance of meetings, respond to emails and other communications in relation to the work of the LSCB
- Attend meetings, or provide a suitable deputy by notifying the Chair in advance and obtaining agreement (deputy should be consistent)
- Participate in meetings and vote on decisions as a representative of their organisation or stakeholder group
- Feedback relevant information to their group or organisation
- Represent and promote the work of the LSCB
- Ensure knowledge of national and local safeguarding developments are kept up to date, including their child protection/safeguarding training

Meeting Frequency

Bi-monthly – January, March, May, July, September, November

An extraordinary meeting may be added during the year, if necessary

Support

The LBTH Policy, Programmes and Community Insight Team provide business and policy support for the Board including:

- Arranging meetings
- Planning and writing papers
- Coordinating Board papers
- Writing and circulating minutes
- Advising on key policy developments

Relationships and links with other Strategic Bodies

Children and Families Partnership*

Community Safety Partnership

Health and Wellbeing Board

London Safeguarding Children Board

** Memorandum of understanding/ Protocol developed between the LSCB Main Board and CFPB*

Appendix 3 – Executive Business Group: Terms of Reference

Context:

THSCB agreed in November 2015 to re-establish the LSCB Executive Group in to its governance structure and act the strategic management body on behalf of the Board.

Agreed Terms of reference:

1. To ensure compliance with the Children Act 2004 and Working Together to Safeguard Children Guidance (2015) regarding the functioning of the board
2. To alert the LSCB to any matters requiring their attention, including the need for serious case reviews, identified safeguarding risks for agency mitigation
3. To agree which key national, regional and local issues or consultations the LSCB will respond to
4. To ensure more emphasis is placed on responding to outcomes of local and national reviews
5. To influence the LSCB Board agenda, commissioning work required and ensuring that clear solutions and/or proposals have been formulated for items taken to the Board
6. To oversee the production of an annual report reflecting the achievements of the LSCB partnership, identify areas for improvement and identify its future priorities
7. To performance manage the LSCB through its systems, processes and impact i.e.
 - Business Plan
 - Budget
 - Risk
 - Performance dashboard
 - Quality assurance activity
 - Serious case/thematic review improvement plans
8. To commission targeted work on behalf of the LSCB which fall outside the remit of its subgroup work streams
9. To ensure Partners' commissioning strategies include robust arrangements for safeguarding children
10. To develop and maintain the LSCB risk/issues register and identify mitigating actions
11. To identify potential joint working areas with the safeguarding adults board to facilitate a proactive interface between both boards

Membership

LSCB – Chair and business support
LBTH – Children’s Services
Met Police – Borough
Met Police - CAIT
Tower Hamlets CCG
National Probation Service (Borough)

Additional board members will be requested to attend as and when required

Quorum

Two out of the three statutory agencies to be present to ensure full quoracy

Frequency of Meeting

The Executive Group will meet four times per year (quarterly) – Jan, April, July, Oct

Chairing and minutes

The independent chair of the LSCB will chair the Executive Group and will be supported by the LSCB business manager, LSCB administrator and other functions of the Policy, Programmes and Community Insight Service (LBTH).

Appendix 4 – LSCB Budget - Income and Expenditure 2015-16

A) Partner Contributions for 2015-16

Police	5,000	Fixed Pan-London
Probation	2,000	Fixed Pan-London
ELFT	2,500	
CAFCASS	550	Fixed Nationally
CCG	15,000	
BHT	3,000	
NHS England (London)	0	
CSC	15,000	
London Fire Brigade	500	Fixed Pan-London
Total Annual Contribution 2015-16	43,550	

B) Local Authority – Staff Annual Costs* (with on-costs)

	Actual 2015-16
LSCB Business Management (full time)	58,896
LSCB Administrator (part time)	20,801
Total	79,697

* LSCB staff costs are funded by Tower Hamlets Core Budget

C) THSCB - Recurring Variable* Annual Costs

	Recurring Variable
Hospitality	416
Training/Conference (attendance)	0
Comensura Surcharges	314
THSCB Chair (30 days p/a)	27,945
Case Review Group: Serious Case Review x 2	23,075
SCR Learning Dissemination Events (room hire & hospitality)	3,644
Non-SCRs (thematic) x 1	67,621
Contribution for THSCB Training Programme	7,000
Total Expenditure	130,015

* Annual expenditure linked to LSCB planned and unplanned activities

D) Summary of THSCB Budget and overall spend:

Overall Total LSCB Spend (B+C)	209,712
Partner Contributions (A)	- 43,550
LSCB Shortfall (covered by Local Authority)	166,162

Appendix 5 – LSCB Performance for 2015-16

Children in Need							
Source	Description	2012/ 2013	2013/ 2014	2014/ 2015	2015/ 2016	England Average	Statistical Neighbours
LOCAL1	Referral rate per 10,000 of the children & young people (C&YP) population	426.7	431.7	443.8	529.0	573.0	594.0
APA SS6	Percentage of Referrals that were repeat referrals	9.6%	10.6%	10.0%	9.1%	23.4%	15.8%
N07	Rate of assessments per 10,000 of the C&YP population	413.6	410.8	331.8	336.0	355.7	152.7
N14	Assessments completed within 45 days or less from point of referral	74.8%	75.8%	85.1%	58.3%	82.3%	71.9%
Child Protection							
Source	Description	2012/ 2013	2013/ 2014	2014/ 2015	2015/ 2016	England Average	Statistical Neighbours
-/-	Rate of Children Subject of a Child Protection Plan per 10,000 at 31 March	58.2	55.6	51.0	50.1	42.1	42.1
N08	Section 47 (child protection) enquiries rate per 10,000 C&YP population	190.2	167.0	162.1	232.7	124.1	121.8
N13	Initial Child Protection Case Conferences – rate per 10,000 C&YP population	63.9	57.4	62.1	65.3	56.8	60.3
N15	Initial Child Protection Case Conferences convened within 15 days from point Child Protection Strategy meeting held	59.1%	52.2%	58.2%	73.7%	69.3%	61.9%
N17 (Formerly NI 64)	Percentage of Child Protection Plans lasting two years or more at 31 March and for child protection plans which have ended during the year.	10.1%	7.1%	11.4%	5.1%	4.5%	4.8%
N18	Percentage of children becoming the subject of Child Protection Plan for a second or subsequent time	14.5%	17.9%	15.2%	13.0%	15.8%	16.7%
N20 (6 months Rolling Year)	Percentage of cases where the lead social worker has seen the child in accordance with timescales specified in the CPP.	N/A	65.4%	54.5%	51.0%	69.0%	58.4%

NI 67	Percentage of Child Protection Reviews carried out within statutory timescale	98.0%	97.6%	94.9%	91.3%	94.6%	97.4%
APA SS13	Percentage of children with CP plans who are not allocated to a Social Worker	0.0%	0.3%	0.0%	1.0%	N/A	N/A
LOCAL2	Percentage of LADO cases resolved in 30 days or less	74.1%	69.6%	69.0%	67.0%	N/A	N/A
Looked after Children							
Source	Description	2012/ 2013	2013/ 2014	2014/ 2015	2015/ 2016	England Average	Statistical Neighbours
-/-	Rate of Looked After Children per 10,000 as at 31st March	53.0	55.0	44.0	47.3	60.0	70.0
LACP01 (Formerly NI 62)	Percentage of CLA with three or more placements	11.2%	11.0%	9.7%	11.1%	11.0%	12.0%
LACP02 (Formerly NI 63)	CLA under 16, looked after for 2.5 years or more and in the same placement for 2 years	69.6%	79.0%	87.0%	80.6%	67.0%	68.0%
LACP04	The percentage of children looked after who went missing from care during the year as a percentage of all children looked after during the year (new definition)			5.1%	8.1%	N/A	N/A
PAF C63	CLA who participated in their review	98.4%	88.6%	92.4%	89.4%	N/A	N/A
NI 66	CLA cases which were reviewed within required timescales	96.4%	89.9%	85.5%	65.0%	N/A	N/A
APA SS(LAC)5	Percentage of CLA with a named Social Worker	99.0%	98.2%	99.3%	98.3%	N/A	N/A
PAF C19	Percentage of CLA >12 months who had an annual Health and Dental check	85.6%	91.5%	89.8%	68.0%	86.4%	90.7%
PAF C19	Percentage of CLA>12 months whose Immunisations were up to date	79.7%	78.5%	88.2%	N/A	N/A	N/A
Care Proceedings							
Source	Description	2012/ 2013	2013/ 2014	2014/ 2015	2015/ 2016	England Average	Statistical Neighbours

N22	Number of C&YP (per 10,000) aged 0-17 years who are the subject of an application to court in the past 6-months (including care & supervision orders)	N/A	N/A	N/A	N/A	N/A	N/A
A08	Average length of care proceedings locally (weeks)	53	42	35	29	30	35
Leaving Care							
Source	Description	2012/2013	2013/2014	2014/2015	2015/2016	England Average	Statistical Neighbours
LACLC02 (Formerly NI 148)	The proportion of young people aged 19 who were looked after aged 16 who were not in employment, education or training	N/A	28.0%	38.5%	50.0%	38.0%	32.8%
LACLC03 (Formerly NI 147)	The proportion of young people aged 19 who were looked after aged 16 who were in suitable accommodation	N/A	67.6%	86.1%	100.0%	77.8%	82.3%

Education

Source	Description	2012/2013	2013/2014	2014/2015	2015/2016	England Average	Statistical Neighbours
LACATT01	The percentage of children looked after continuously for 12 months who achieved at least level 4 at Key Stage 2 in both English and mathematics	71.0%	62.0%	62.0%	N/A	48.0%	51.8%
LACATT02 (Formerly NI 101)	Percentage of CLA who achieved 5 A*-C GCSEs (incl. English & Maths)	25.0%	11.5%	11.5%	N/A	12.5%	18.5%

Child Sexual Exploitation

Source	Description	2012/2013	2013/2014	2014/2015	2015/2016	England Average	Statistical Neighbours
MPS Database	Child Sexual Exploitation - Suspicion (Rate per 10,000)	N/A	N/A	10.0	11.5	N/A	3.5
MPS Database	Child Sexual Exploitation - Crime (Rate per 10,000)	N/A	N/A	3.8	2.9	N/A	1.2
MPS Database	Child Sexual Exploitation - Intervention / Disruption (Rate per 10,000)	N/A	N/A	5.9	4.8	N/A	2.5
MPS Database	Child Sexual Exploitation - Detection (Rate per 10,000)	N/A	N/A	0.6	0.7	N/A	0.1

Appendix 6 - GLOSSARY

BASHH	British Association for Sexual Health and HIV
BHT	Barts Health Trust
CA04	Children Act 2004
CAF	Common Assessment Framework
CAG	Clinical Academic Group
CAIT	Child Abuse Investigation Team
CAMHS	Child and Adolescent Mental Health Service
CCG	Clinical Commissioning Group
C&F ACT 2014	Children & Families Act 2014
CHAMP	Child & Adolescent Mental Health Project
CLA	Children Looked After
CME	Children Missing from Education
CPS	Crown Prosecution Service
CSC	Children's Social Care
CSE	Child Sexual Exploitation
CSP	Community Safety Partnership
CQC	Care Quality Commission
DCOS	Disabled Children Outreach Service
DHR	Domestic Homicide Review
DV&HCT	Domestic Violence and Hate Crime Team
ED	Emergency Department (A&E)
ELFT	East London Foundation NHS Trust
FGM	Female Genital Mutilation
FNP	Family Nurse Partnership
IPST	Integrated Pathways & Support Team
LAC	Looked After Child
LADO	Local Authority Designated Officer
LCS	Leaving Care Services
LSCB	Local Safeguarding Children Board
MARAC	Multi-Agency Risk Assessment Conference
MASE	Multi-Agency Sexual Exploitation (Panel)
MASH	Multi-Agency Safeguarding Hub
MPS	Metropolitan Police Service
NICE	National Institute for health and Care Excellence
NSPCC	National Society for the Prevention of Cruelty to Children
NTDA	National Trust Development Agency
PFSS	Parent and Family Support Service
PVE	Preventing Violent Extremism
RLH	Royal London Hospital
SAB	Safeguarding Adults Board
SCR	Serious Case Review
SEND	Special Education Needs and Disabilities
SI	Serious Incident
SIP	Social Inclusion Panel
SoS	Signs of Safety
TH	Tower Hamlets
THSCB	Tower Hamlets Safeguarding Children Board
VAWG	Violence Against Women and Girls
WT15	Working Together 2015

KEEPING CHILDREN SAFE IN TOWER HAMLETS 2015-16

Tower Hamlets
Safeguarding
Children
Board



The Local Safeguarding Children Board is here to help keep children and young people free from abuse or neglect.

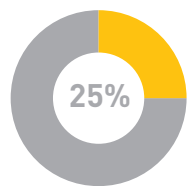
POPULATION

284,000

We have the fastest growing population in the country



53% of state school pupils are eligible for free school meals

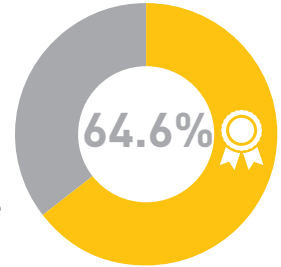


25% of our population are under 19

49% of children are living in poverty. Compared to London average of 37%

EDUCATION

64.6% of children achieved 5 grade A*- C passes including English and Maths, compared to the national average of 57.3%



84% of 11 year olds exceeded the national average for reading, writing and maths. The national average is 80%.

VULNERABLE CHILDREN



Most children grow up safe, happy and well. However, a small number of children and young people face some serious challenges in their lives.

The rate of children subject to a child protection plan per 10,000 population is 50.1. The percentage of children subject to child protection plan by category are:
Emotional Abuse **49%**
Neglect **28%**
Physical Abuse **19%**
Sexual Abuse **3%**
Multiple Abuse **1%**

Children living with domestic violence is the most common reason why children become subject to a child protection plan (emotional abuse)

HEALTH

77.5 years – life expectancy for a man vs. 79.4 years national average

82.6 years – life expectancy for a woman vs. 83.1 years national average

45% of five year old children experienced tooth decay compared to 28% nationally

9.3% of babies born have a low birth weight compared to 7.7% in London



22.5% of children aged 4-5 years are obese compared to 21.9% nationally

A SAMPLE OF THE BOROUGH

If you took a sample of 10,000 children in the borough, you would find:

529 would be referred to Children's Social Care in a year, compared to 594 in London

8.3% referrals required no further action compared to 13.8% for England. This suggests appropriate support at the point of contact.

53 children would be looked after, compared to 70 in London

50.1 children would be subject to a child protection plan compared to 42 across England

779 children in need would get help and support from Children's Social Care, compared to 702 across London



ACTIVITY OVER THE LAST YEAR

COMMUNITY WORK



2 female genital mutilation (FGM) community mediators appointed

4 specialist FGM child protection advisors appointed

87 children were identified and accessed FGM specialist support

40 community events reached **142** women, **120** men and recruited **20** peer champions to deliver FGM preventative messages



FGM training in schools reached

480 girls

180 boys

200 school staff

PRIORITIES FOR 2016-17

Priorities for next year will continue to focus on improving our work in the following areas:

1. Early Help and Early Identification

Ensure we are working well to provide the right help at the right time

2. Radicalisation and Extremism

Improve our knowledge, practice and multi-agency response to children and young people at risk

3. Child Sexual Exploitation and Missing Children

Ensure we have effective arrangements in place to support victims and perpetrators of sexual exploitation and those at risk of serious youth violence.

LEARNING FROM SERIOUS CASE REVIEWS:

The LSCB has completed one serious case review this year. The findings suggest professionals need to:


- Learn more about emotional abuse & neglect experienced by young and older children and how this impacts on their behaviour and relationships
- Recognise harmful sexual behaviour earlier in childhood
- Work better with parents who are harder to engage
- Help children living outside Tower Hamlets receive the therapeutic support they need



The LSCB analysed learning from all case reviews completed in the last four years. These suggest professionals working with children need to know more about:

- Fractured family relationships
- Violence from children towards parents and siblings
- Impact of childhood trauma on later life
- Vulnerable children becoming dangerous adolescents



<p>Cabinet</p> <p>1 November 2016</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Denise Radley, Corporate Director, Adults Services</p>	<p>Classification: Unrestricted</p>
<p>Safeguarding Adults Board Annual Report 2015/16</p>	

Lead Member	Councillor Amy Whitelock-Gibbs, Cabinet Member for Health and Adult Services
Originating Officer(s)	Peter Davis, Interim Strategic Manager for Adult Safeguarding
Wards affected	All wards
Key Decision?	No
Community Plan Theme	A Safe and Cohesive Community

Executive Summary

The Safeguarding Adults Board has a statutory duty under the Care Act to produce an annual report detailing what the SAB has done during the year to achieve its main objectives and implement its strategic plan. Additionally it should record what each member agency has done to implement the strategy as well as detailing the findings of any Safeguarding Adults Reviews and subsequent action.

The report has been prepared within the Children and Adults' Services Policy, Programmes and Community Insight Team alongside the preparation of the Local Safeguarding Children Board Report. This helps to ensure consistency in terms of approach, content, structure and quality.

Key messages within the Annual Report are:

1. Adults referred under safeguarding procedures are safeguarded
2. There is excellent multi-agency engagement in the SAB and its Business
3. Learning more about the service user/patient experience will be an important priority for 2016/17

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the annual report for the local Safeguarding Adults Board for 2015/16.

1. REASONS FOR THE DECISIONS

1.1 The local Safeguarding Adults Board (SAB) is required to publish an annual report on the effectiveness of adult safeguarding arrangements and promoting the welfare of adults in its locality and ensure the annual report is available within the professional and public domain. The SAB annual report, which fulfils this responsibility, is appended to this briefing paper.

2. ALTERNATIVE OPTIONS

2.1 There are no alternative options, as it is a statutory requirement for this report to be reported to the Mayor.

3. DETAILS OF REPORT

3.1 The Safeguarding Adults Board (SAB) has a statutory duty under the Care Act to produce an annual report detailing what the SAB has done during the year to achieve its main objectives and implement its strategic plan. Additionally it should record what each member agency has done to implement the strategy as well as detailing the findings of any Safeguarding Adults' Reviews and subsequent action.

3.2 The report has been prepared within the Children and Adults' Services Policy, Programmes and Community Insight Team alongside the preparation of the Local Children's Safeguarding Board Report. This helps to ensure consistency in terms of approach, content, structure and quality.

3.3 The Annual Report gives an overview of the membership, governance and accountability arrangements for the SAB, together with the legal, national and local contexts in which it operates.

3.4 In accordance with the Care Act 2014, the SAB has a strategy regarding the safeguarding of adults with an associated business plan. The strategy and business plan are structured around the six key principles of safeguarding as defined by the Care Act 2014. These are: Empowerment, Prevention, Proportionality, Protection, Partnership and Accountability. The Annual Report details the progress made in delivering the business plan in relation to each of these six key principles. In addition the report provides details of the Board's priorities for 2016/17.

3.5 The Annual Report provides details of how member organisations are scrutinised in relation to evaluating the effectiveness of safeguarding arrangements within the borough. This includes a summary of the Self Audit challenge in which member organisations completed an extensive proforma to evaluate their own performance. In addition to this the local authority undertook an external review by the Association of Directors of Social Services, and the report provides a summary of this review.

- 3.6 The SAB has a legal duty to make arrangements for a Safeguarding Adults Review (SAR) in the event of a death of a vulnerable adult, where abuse or neglect have been a contributory factor. Two SARs were undertaken in Tower Hamlets in 2015/16 and the SAR reports, their findings and recommendations are summarised in the Annual Report.
- 3.7 The annual report provides an overview of data relating to adult safeguarding enquiries in 2015/16 as well as a detailed analysis of activity relating to Deprivation of Liberty Safeguards under the terms of the Mental Capacity Act.
- 3.8 Finally, the annual report includes contributions from key member organisations about progress they have made in safeguarding adults; how they evaluate their own effectiveness; and improvements that have been made in safeguarding arrangements.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 There are no direct financial implications as a result of the recommendations in this report. Any recurring financial implications arising from the findings of SARs will be considered as part of the Council's Medium Term Financial Strategy.
- 4.2 The feasibility of a pooled fund with contributions from partner agencies to support the work of the board continues to be investigated in 2016/17 as the majority of the current costs are met from the Adults' Services revenue budget.

5. LEGAL COMMENTS

- 5.1. The Council is required by section 1 of the Care Act 2014 to exercise its functions under Part 1 of the Act so as to promote the well-being of adults, which includes safeguarding adults who have care needs, who are at risk of abuse and neglect. Pursuant to section 42 of the Act, the Council has a positive obligation to enquire into actual and potential cases of abuse or neglect so as to enable decisions to be taken about what action should be taken in each adult's case.
- 5.2. The Care Act 2014 places the Council's duties in respect of safeguarding adults with care needs who are at risk of abuse or neglect on a statutory basis. The requirements in respect of establishing a Safeguarding Adults Board (SAB) are set out in Sections 43-45 and Schedule 2 of the 2014 Act. As with all of the Council's duties under the Act, the duty to promote wellbeing applies to the Council's safeguarding duties.
- 5.3. The Care and Support Statutory Guidance (most recently updated in March 2016) sets out further detail in respect of the requirement to publish the SAB strategic plan and annual reports, at paragraphs 14.155-14.161 of the

Guidance. The SAB must comply with those requirements, unless they can demonstrate legally sound reasons for not doing so.

- 5.4. The Deprivation of Liberty Safeguards ('DoLS') is the procedure prescribed in the Mental Capacity Act 2005 when it is necessary to detain a resident or patient who lacks capacity to consent to their care, in order to keep them safe from harm. DoLS seek to ensure that a care home or hospital only deprives someone of their liberty in a safe and correct way, and only when it is deemed to be in the best interests of the person, where there is no other less restrictive way to look after them. In the majority of cases, the Council is able to authorise these DoLS, although in certain circumstances an order must be obtained from the Court of Protection.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 The Safeguarding Adults' Board Annual Report details action taken to address the risk of abuse and neglect against a wide range of vulnerable people who are at risk of discrimination. This includes but is not limited to people with learning disabilities, people with physical disabilities, people with mental health problems and older adults.

7. BEST VALUE (BV) IMPLICATIONS

None identified

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

Not applicable

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 The production of the Safeguarding Adults' Board Annual Report ensures that the Council fulfils its statutory duty to do so under the terms of the Care Act 2014. With regard to the Council's identified risk around the safeguarding of vulnerable adults, the report also includes summary information on Safeguarding Adults' Reviews and the learning and sharing of best practice which takes place when a SAR is undertaken.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 The Annual Report includes a record of action by the local authority and its partners to tackle abuse and neglect which may include criminal acts against adults at risk living in Tower Hamlets.

11. SAFEGUARDING IMPLICATIONS

- 11.1 The report details action taken by the local authority and all member agencies to tackle abuse and neglect. It includes the achievements of the Safeguarding Adults Board in 2015/16.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE

Appendices

- Appendix 1 – SAB annual report 2015-16
- Appendix 2 – Infographic

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

- NONE

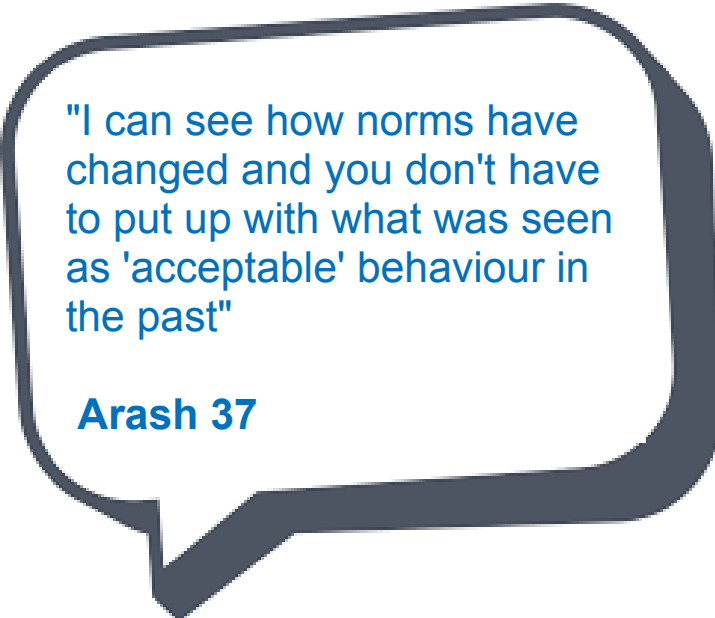
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Tower Hamlets Safeguarding Adults Board

Annual Report 2015/16

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"I can see how norms have changed and you don't have to put up with what was seen as 'acceptable' behaviour in the past"

Arash 37

A dark blue speech bubble with a white background, containing text and a name.

"After going through the policy it made me feel more confident in what I can do to report abuse"

Hana 52

Tower Hamlets Safeguarding Adults Board Annual Report

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Independent Chair's Foreword

Any annual review report is in part reflection on and accountability for what has happened in the year just ended (here up to end March 2016), and importantly some commentary about the prospects for the new year (2016/17).

In the case of Tower Hamlets Safeguarding Adults Board (THSAB) the end of 2015/16 coincided with the departure of myself after 6 years as the Board's Independent Chair, and the beginning of 2016/17 with the arrival of Christabel Shawcross as the newly appointed Independent Chair. I was pleased that (i) Christabel and I were able to plan a good 'handover' from both our own perspectives and also in the interests of continuity for some of its key matters, and (ii) having extended my own plan to stand down by a further year from March 2015, the latter part of 2015/16 was marked by some very key leadership changes, particularly within Tower Hamlets Council and Barts NHS Trust, after extended periods of leadership uncertainty in both. They can only serve well for the future interests of those people whose safety and wellbeing in the borough the SAB exists to serve.

It is because of this Independent Chair transition that the foreword to this Annual report is in effect a joint product of two of us. For myself I would make the following observations:

A strength of TH SAB over all the recent years has been the huge amount of goodwill and personal commitment from individual people representing not just the main local authority, NHS and police statutory partners but also other public protection, housing, voluntary and advocacy organisations in an inclusive way on the SAB. Sometimes the capacity of all organisations, all themselves under many other pressures, to deliver on the organisational leadership, change implementation and service delivery expectations in relation to safeguarding adults has been a challenge to them, and is likely to continue to be. The implications of implementing the Care Act 2014 from April 2015 were, and are, hugely significant in both their statutory imperative and public symbolism for multi-agency safeguarding adults arrangements. The benefits will accrue over time, especially in making safeguarding more 'personal' and sensitised to the safeguarding needs and wishes of individual people.

Notwithstanding this note of caution, almost all the Board organisations willingly and constructively contributed to the scrutiny and learning opportunities of the SAB self-

assessment and audit process in the last quarter of 2015/16. The outcome of this now gives a number of objectives for both single agency and multi-agency developments and improvements in 2016/17. It is important though to note that the SAB conducted two safeguarding adults reviews in 2015/16 concerning two tragic, unforeseen and should have been avoidable deaths of people in the previous year, in both of which weaknesses were identified from the independent external overview reports. There are actions plans across organisations now in place, and being reviewed, to ensure necessary improvements are made.

Elsewhere in this annual review report year you will see some of positive achievements in 2015/16: for the first time a 4 year SAB strategic plan from 2015/16; linked with this, the first of one year at a time business plans; and the beginnings of a much more robust multi-agency performance information reporting framework. It is helpful for the future that all of these fit well with the new Pan London Safeguarding Adults Policies & Procedures agreed for implementation from April 2016, which were 'signed off' in time for the new year by all London Councils Directors of Adult Social Services, NHS England and the Metropolitan Police.

There is much in this annual review report which I hope gives organisations and the public confidence in what the safeguarding adults arrangements in Tower Hamlets are trying to achieve on their behalf, as well as identification of continued areas for development. There is continued important need to explore how to know more about the experiences, wishes and feelings of people for whom safeguarding arrangements are initiated. Also there is a need to strengthen the links with other partnership bodies in Tower Hamlets, including - Health and Wellbeing, Community Safety, Safeguarding Children and others, and to rationalise the work programmes of each where appropriate.

I would like to conclude my part of this foreword, and my last annual review report, by thanking so many people who over the years supported me in my role as Independent Chair. This is many people across many public sector and voluntary/community organisations. I was especially pleased that in terms of the ethnic diversity of Tower Hamlets I was at last able to make a private visit to Bangladesh in 2015 from which I learned so much. I would like to recognise three people who have 'been there' supportively from my appointment six years ago - Alan Tyrer from Tower Hamlets Council, Paul James from East London NHS Foundation Trust and John Wilson from Providence Row Housing Association. All have offered wise and helpful feedback and advice at many points. From the past year I would particularly want to mention the energy and leadership given to safeguarding adults by Luke Addams in his role of Acting Director of Adult Social Services and Peter Davis as interim lead SAB professional officer, as well as the very welcome new political leadership and engagement with safeguarding adults by the Council's Lead Councillor Cabinet Member. From April 2016 the SAB's work will undoubtedly be strengthened by the newly appointed 'permanent' Council Director, Denise Radley and by Barts new Director of Nursing, Caroline Alexander. Both have huge relevant experience for their new roles which have safeguarding adults at their core. Obviously I wish Christabel Shawcross all the very best as the Independent Chair, and not least the refreshing change of style, personality and gender she will bring to the leadership of multi-agency safeguarding adults arrangements.

Most importantly, as I also said in my foreword a year ago, whatever the challenges to everybody working in Tower Hamlets, it is the role of the SAB to ensure that the absolute resolve and determination to protect people from abuse and harm in Tower Hamlets is maintained, and that the SAB strives to be as effective as it possibly can. In my view everybody in Tower Hamlets can be assured into 2016/17 that the Board is very clear as to its important duties, responsibilities and priorities.

Brian Parrott
Independent Chair
Tower Hamlets Safeguarding Adults Board
(Up to March 2016)



Incoming Independent Chair's Foreword

In April 2016 I was delighted to be appointed as Independent Chair for the Tower Hamlets Safeguarding Adults Board (SAB). My thanks to the previous Chair Brian Parrott, for a detailed handover and leaving the Board on a good footing for the challenges ahead. Previous annual reports and the current SAB Strategy show significant progress in the work of all member agencies to promote adult safeguarding with the Care Act changes. I relish the opportunity to take this work forward to build on what has already been achieved. My first priority for 2016/17 has been to review the SAB functioning, seeking all partners' views. This has resulted in a new approach to engage partners in driving the agenda and setting up an Executive Group to take a proactive approach as statutory partners, to agree new ways of preventing abuse and improving outcomes for residents. A key priority is to consider how to ensure the user's voice is heard by the board to help Make Safeguarding Personal. The review of the business plan to define desired outcomes will ensure that we deliver on the Care Act and MSP. The SAB Strategy and Business Plan continue to be built around the six key principles of Safeguarding defined by the Care Act 2014:

- Empowerment
- Prevention
- Proportionality
- Protection
- Partnership
- Accountability

Key Priorities for 2016/17 are as follows:

- To improve quality assurance and service user engagement and develop service user feedback mechanisms for adults involved in the safeguarding process.
- Improve access to safeguarding awareness training for voluntary sector staff
- A continued focus on monitoring adults with learning disabilities who are admitted to assessment and treatment units.
- Participation in the NHS England LD Mortality Review project to improve quality of health care.
- Better partnership working in the collection, challenge and analysis of safeguarding data.
- Improved understanding of why certain disadvantaged groups are under-represented in safeguarding referrals and actions to increase awareness.
- Ensuring learning from SARs is embedded in partnership working.

In 2016/17 the SAB will focus more on themes such as Preventing abuse and what as partners, we can do better together, and enable residents to have more information on what they can do to protect themselves and others. The Partners will also work to have more connections with those on the frontline through workshops, and to build more integrated approaches with the Local Safeguarding Children's Board. There will be a focus on the Think Family Approach, to deliver support for carers and people with learning disability or mental health problems in the Transition from children's to adults' services.

We also recognise the key part the SAB partners have to play as leaders, promoting Community Safety and recognising the high incidence of Domestic Violence and we will review partnership work activities to improve outcomes.

We also want to improve the engagement with local communities recognising the under representation of Black Minority Ethnic groups in referrals and will work with key housing and voluntary sector partners on the board to support this work. This will also be analysed by a LA Community Insight Research Report to help understand the current position and causes for the under representation so we can all increase engagement. I particularly welcome the lead member's absolute commitment focus on this to support us.

Statutory services such as the Police, Health, Fire Service and London Ambulance Service have strengthened their commitment as key partners to prevent abuse and learn lessons when things go wrong. There have been some fundamental failures of multi-agency work and everyone is committed to developing practice and ensuring lessons are learnt for the Safeguarding Adults Reviews summarised in this report.

As the new Independent Chair, one of my first tasks was to chair a Workshop introducing the new Pan London Safeguarding Guidelines and I welcomed the new Borough Commander Sue Williams and Director of Adults Denise Radley, whose commitment to working with frontline staff was evident. I will ensure we build on this in the coming year. I am confident that the Tower Hamlets SAB is in a good position with the new business plan to deliver on our ambition for 2016/17. I look forward to working with the partner organisations to ensure that **Safeguarding is Everybody's Business**.

Christabel Shawcross
Independent Chair
Tower Hamlets Safeguarding Adults Board



Cabinet Member for Health and Adult Services Foreword

I am pleased to endorse the Safeguarding Adults Board (SAB) annual report and acknowledge the strong commitment of many local partners to keeping our residents safe from harm, abuse and neglect.

We are acutely aware in Tower Hamlets of the particular challenges we face arising from a fast-growing, densely-populated borough with significant health inequalities, deprivation, unemployment, housing issues and a high proportion of adults living with disabilities, health conditions and complex needs. Combined with welfare reforms and continuing reductions in Government funding, these factors lead to high levels of adult vulnerability, with higher scope for risk of abuse, neglect and self-neglect.

It is therefore crucial that through the SAB, local partners can coordinate to deliver preventative safeguarding work and respond robustly to concerns and incidents. I was pleased to participate in a multi-agency workshop in May where the level of dedication and ambition to do more to keep local people safe and raise awareness that safeguarding is everyone's business was evident, with a range of ideas to strengthen partnership, awareness, and service user engagement (section 2.7).

This report sets out a number of achievements across partners under the 6 core principles of empowerment, prevention, proportionality, protection, partnership and accountability. In particular I would highlight the encouraging feedback from the ADASS peer review of the council's social care practice, the range of training carried out by partner organisations for both users and staff, development of a hoarding policy responding to the new self-neglect provisions in the Care Act, and the local launch of the Pan-London policy and procedures, supported by local processes which promote a more person-centred and outcome-focused approach.

It is also positive to see that 90% of adults at risk said they were satisfied with the safeguarding process and outcome, with the proportion of service users saying "I feel as safe as I want" continuing to rise slightly each year.

Nevertheless, there is still much to do across the partnership to ensure we are preventing, identifying and responding to abuse, harm and neglect as thoroughly and promptly as we need to. This report summarises two Safeguarding Adults Reviews where neglect or self-neglect contributed to the tragic deaths of two vulnerable adults who needed support and protection, which should have been avoided. The reviews identified a number of crucial lessons for a range of partners, with action plans already implemented, and I know there is strong commitment from partners to embed this learning into practice and to push ourselves to be ever more vigilant.

There are other areas where we need to see improvement, such as ensuring robust and consistent monitoring and performance information, and interrogating why we see lower referral rates locally from care homes and from particular ethnic groups.

Finally, I would like to formally thank Brian Parrott for his years of service to the SAB and the Tower Hamlets community, and to welcome Christabel Shawcross who has already brought new perspectives and ideas to the challenges we face. I look forward to working with her and with partners across the SAB to maintain a robust focus on keeping adults safe in our community.

Cllr Amy Whitelock Gibbs

Section 1: Governance and Accountability Arrangements

1.1 Board Membership

The London Borough of Tower Hamlets Safeguarding Adults Board (SAB) presently consists of 18 member organisations. To ensure compliance with the Care Act 2014 this includes Tower Hamlets Clinical Commissioning Group (CCG), the Police and Tower Hamlets Council. As a result of local health commissioning arrangements, East London NHS Foundation Trust and Barts NHS Trust are also key members of the SAB. A full membership list is provided in Appendix 1. Notable additions to the SAB in 2015/16 were representation from the G.P. Care Group and the membership of the Directors of Nursing from the local hospitals (Barts).

1.2 Governance Arrangements

In 2015/16 the SAB was chaired by Brian Parrott, who is independent of the Council and all of the statutory and voluntary organisations in Tower Hamlets. Having held the position since 2010 Brian Parrott stood down as Chair at the end of March 2016 and Christabel Shawcross was appointed as his successor.

Whilst it is not a requirement under the Care Act to have an independent Chair, this is in line with what the statutory guidance suggests is good practice, and ensures that the Board can act effectively in its oversight role. The Chair reports directly to the local authority's Chief Executive and meets regularly with the Director of Adult Services and other key partners, for example Tower Hamlets CCG, Bart's Health, East London Foundation Trust and the Metropolitan Police.

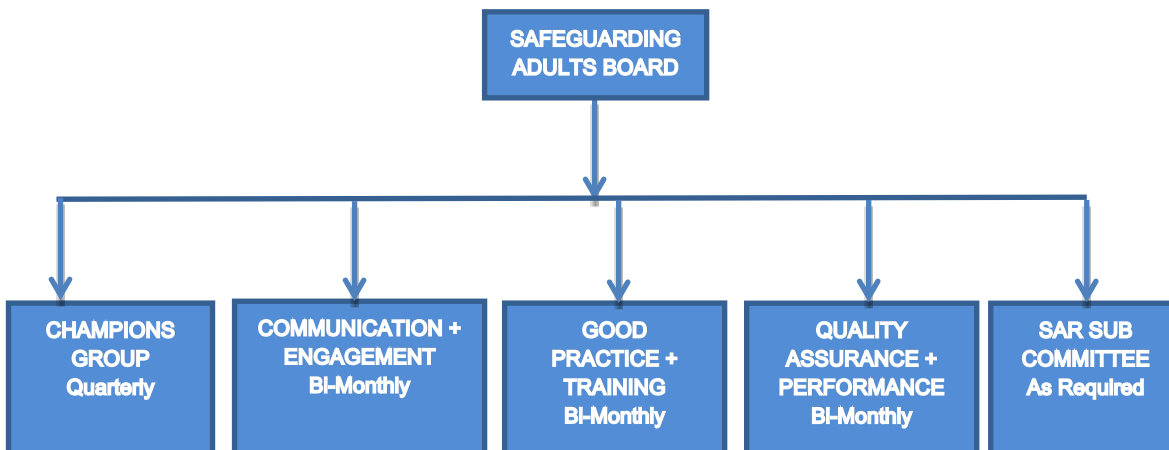
Appointment of an Interim Strategic Manager for Adult Safeguarding in the local authority has enabled a further review of membership to ensure that the Board continues to act effectively and represent all key stakeholders. This strategic manager post sits within the Policy, Programmes and Community Insight service for Adults' and Children's Services. The post is designed to ensure a strengthening of support that will ensure that the Board is able to confidently meet the enhanced requirements of the Care Act and deliver better outcomes for vulnerable residents.

In 2015/16, the SAB also implemented a new Joint Quality Assurance and Performance Framework which is designed to enable the Board to ensure that local safeguarding arrangements are effective and deliver improved safety and outcomes for the people of Tower Hamlets. The Quality Assurance Framework acts as the mechanism by which the SAB will hold local agencies to account for their safeguarding work, including prevention and risk management. It also provides collaborative leadership for safeguarding whilst ensuring proportionality and balance in the safeguarding system. It promotes personalised safeguarding and places a focus on outcomes as well as targets.

The work of the SAB, including the work contained within the Business Plan is undertaken by the sub-groups of the SAB with oversight by the SAB and the SAB Strategy Group.

Following a review of the sub-group structure in 2015, the sub-group structure is illustrated below:

Tower Hamlets SAB Sub-Group Structure



1.3 Relationships with other Strategic Boards

1.3.1 Health and Wellbeing Board

The Care Act expects SABs to establish effective relationships and protocols with a variety of key boards. Health and Wellbeing Boards (HWBB) were established by the Health and Social Care Act 2013. HWBBs are a statutory requirement for local authorities and are intended to be a Board where key leaders from health and care commissioning agencies work together to improve the health and wellbeing of their local population and reduce health inequalities.

The Tower Hamlets Health and Wellbeing Strategy is a key commissioning strategy for the delivery of services to children and adults across the borough and so it is critical that, in compiling, delivering and evaluating the strategy, there is effective interchange between the HWBB and both the Adult and Children's Safeguarding Boards. Specifically there needs to be formal interfaces between the Health and Wellbeing Board and the Safeguarding Boards at key points including:

- The needs analyses that drive the formulation of the Health and Wellbeing Strategy and the Safeguarding Boards' annual business plans. This needs to be reciprocal in nature assuring that Safeguarding Boards' needs analyses are fed into the Joint Strategic Needs Analysis (JSNA) and that the outcomes of the JSNA are fed back into safeguarding boards' planning;
- Ensuring each Board is regularly updated on progress made in the implementation of the Health and Wellbeing Strategy and the individual Board plans in a context of mutual challenge;

- Annually reporting evaluations of performance on plans to provide the opportunity for scrutiny and challenge and to enable Boards to feed any improvement and development needs into the planning process for future years' strategies and plans.
- Following on from consultation between the Chairs of the HWBB, the SAB and the Local Safeguarding Children Board (LSCB), a protocol has been agreed which sets out the expectations and interrelationships between health and safeguarding, making explicit the need for Boards to share plans and strategies and offer challenge to each other. The SAB will therefore present its annual report to the HWBB and to enable the HWBB to incorporate SAB priorities in its own strategy. The HWBB will bring its strategy to the SAB on an annual basis to further support the SAB with the development of its strategy and Business Plan. The Independent SAB Chair is an identified stakeholder of the HWBB, receiving agendas and newsletters relating to the HWBB, in addition to attending the HWBB to present the annual report, and attending meetings as appropriate to ensure synergy of work and challenge to the partnership to ensure safeguarding is prioritised.

1.3.2 Community Safety Partnership

The Tower Hamlets Community Safety Partnership (CSP) is a multi-agency strategic group led by the council, and set up following the Crime and Disorder Act 1998. 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. The CSP is made up of both statutory agencies and co-operating bodies within the borough and supported by key local agencies from both the public and voluntary sectors. Registered Social Landlords (RSLs) have a key role to play in addressing crime and disorder in their housing estates. 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 deal with the perpetrator. Ultimately the CSP has a duty to make Tower Hamlets a safer place for everyone.

The CSP is required by law to conduct and consult on an annual strategic assessment of crime, disorder, anti-social behaviour, substance misuse and re-offending within the borough and the findings are then used to produce the partnership's Community Safety Plan. The SAB actively contributes to this wide reaching consultation process.

The CSP 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 the CSP will place an added focus on these areas which will be the priorities for 2013-16.

These are:

- Gangs and Serious Youth Violence
- Anti-Social Behaviour (including Arson)
- Drugs and Alcohol

- Violence (with focus on Domestic Violence)
- Hate Crime and Cohesion
- Killed or Seriously Injured
- Property / Serious Acquisitive Crime
- Public Confidence
- Reducing Re-offending

The Council's Head of Community Safety is a member of the SAB to ensure that there is a formal link between the work of the two boards. This has ensured that the perspective of community safety is integral to the work of the SAB and vice versa, with examples of joint working such as addressing the risk of radicalisation for vulnerable adults, and our newly constituted Adults Risk Management Panel.

1.3.3 Safeguarding Children Board

The Local Safeguarding Children Board (LSCB) is a statutory requirement set out in the Children's Act 2004 which gives duties to ensure that all agencies work together for the welfare of children. The main responsibilities of the LSCB are set out in section 14 of the Children Act 2004 and include the requirement to co-ordinate and quality assure the safeguarding children activities of the member agencies.

The independent chairs of both the LSCB and the SAB meet together to ensure that there is collaborative working on both agendas. The new Care Act duties for SABs are in many ways aligned to those for LSCBs, and to maximise the joint working opportunities, the Council has restructured to align the support for both boards within its Policy, Programmes and Community Insight service. This has further strengthened the existing formal arrangements for joint working.

Both boards continue to have a focus on adult mental health, preventing violent crime and domestic abuse as this affects both vulnerable adults and children. An additional area of joint focus over the last year has been safeguarding people from the risks associated with radicalisation as detailed in the Business Plan.

1.3.4 The Learning Disability Partnership Board

Learning Disability Partnership Boards (LDPBs) were set up in all local authority areas following publication of the Valuing People White Paper in 2001. The Board is a multi-agency strategic group which oversees the implementation of the aims of Valuing People and other local objectives with a view to improving the lives of people with learning disabilities in Tower Hamlets. This includes a focus on health, housing, choice, employment, challenging behaviour and safety.

The LDPB aims to "ensure that all service users feel safe and know how to ask for help". An issue that is closely linked to this aim is Winterbourne View: This 2011 BBC Panorama programme exposed abuse at an Assessment and Treatment Unit in South Gloucestershire, leading to a number of recommendations to safeguard people with a learning disability going forward. Ten key recommendations were published in a "Winterbourne View: Time for Change" report in November 2014. These recommendations have been introduced in Tower Hamlets in two phases, overseen by the Learning Disability Partnership Board. This

includes working with the CCG on health-funded placements and assuring the quality of care for those in residential and supported living placements both in and outside of LBTH.

The Council's Director of Adult Services, Service Head for Adult Social Care and Service Head for Commissioning and Health are all members of both the LDPB and SAB to ensure there is a formal link between the work of the two boards. This has enabled joint working on key areas, including work related to Winterbourne View. The new Strategic Manager for Safeguarding post which supports the SAB, also supports the LDPB, further strengthening the ties between the two boards.

1.4 Budget

The Board and its support arrangements are funded from the Council's core revenue budget. There are financial contributions from partner agencies, together with contributions of resources 'in kind' such as provision of officer time, venues for meetings, and training budgets.

The Care Act introduces the ability for setting up a pooled budget with contributions from all agencies to support the work of the board. Whilst the SAB budget continues to be managed solely by the local authority, key partner agencies make annual contributions to the budget together with ad-hoc payments to support special projects or events such as conferences.

1.5 National and Legal Context

Following the implementation of the Care Act 2014, the SAB is now a statutory requirement in line with arrangements for a LSCB.

In line with its statutory responsibilities, in 2015/16 the SAB produced an annual report for 2014/15 and a strategy with associated business plan, linked to the six key principles of safeguarding defined by the Care Act. Additionally the SAB has undertaken two Safeguarding Adults Reviews in accordance with statute.

Aside from these three key duties, the Department of Health Guidance Notes for the Care Act identify a range of roles and responsibilities for the SAB and these have been incorporated into the SAB's revised terms of reference.

1.6 Local Background and Context

All demographic statistics in Section 1.4 come from the Joint Strategic Needs Assessment, July 2015.

1.6.1 Adults in Tower Hamlets

The estimated resident population of Tower Hamlets is 284,000. Over recent years, the borough has seen some of the fastest population growth in the country. Tower Hamlets remains a relatively young borough, with almost half of the recent population rise concentrated in the 25-39 age range. The profile of the borough is one of increasing diversity, with 43% of the population born outside of the UK. There are sizeable Bangladeshi

(32%) and White British communities (31%) and an increasing number of smaller ethnic groups in the resident population.

Tower Hamlets is the third most densely populated borough in London, and the daytime population increases to 396,000 during the day. Over 100,000 commuters head to work in Canary Wharf each day, and major tourist attractions like the Tower of London draw in over four million visitors each year.

The population of Tower Hamlets is diverse, but there are many active communities who get on well together, with a thriving community and voluntary sector. Community facilities such as Idea Stores and leisure facilities are well-loved and well-used. The borough has seen unprecedented educational success, opening up more opportunities to the young people coming through our schools, and employment rates are rising.

Despite all this change and success, Tower Hamlets still has challenges to face. Too many residents have significant health problems. High housing costs and low incomes mean that homes are unaffordable for many. Too many residents are not in work and struggle to make ends meet, especially as reforms erode the welfare state and costs of living rise. One of the biggest challenges the borough faces is ensuring that the benefits of growth and prosperity reach all parts of our community, with a fairer distribution of wealth and income across Tower Hamlets.

Life expectancy is lower than the rest of the country but is improving. Presently it is 77.5 years for males (compared to a national figure of 79.4 years); and 82.6 years for women (compared to a national figure of 83.1 years). The gap between life expectancy in the most and least deprived areas of the borough has reduced compared to the data presented in the last annual report and now stands at 6.9 years for males and 3.3 years for females.

Tower Hamlets is the 7th most deprived borough in the country and 70% of the population live in the 20% most deprived areas in England.

21.5% of families in Tower Hamlets have a household income of less than £15k, compared to 18% in London. The unemployment rate is 10.3% compared to 7% in London. It is estimated that half of older people live below the poverty line in Tower Hamlets.

The 2011 Census found that 19,356 residents provided some level of unpaid care in the borough, which accounted for 7.6% of all Tower Hamlets residents. The provision of unpaid care is skewed towards the provision of higher levels of care (20+ hours per week).

1.6.2 Health

Reducing the inequalities in health and wellbeing experienced by many Tower Hamlets residents is one of the biggest challenges facing the borough. Although life expectancy has risen over the last decade it continues to be lower than the London and national averages, and significant health inequalities persist. We know that people in Tower Hamlets tend to become ill at an earlier age and this is reflected in the 'healthy life expectancy' figure which is lower than the national averages. The life expectancy gap between Tower Hamlets and England as a whole is 1.9 years for men and 0.5 years for women. 13.5% of residents have a health condition or disability which limits their daily activities, and Tower Hamlets has a

higher number of residents with a severe disability compared with London and England, despite our relatively young population. Tower Hamlets has some of the highest death rates due to cancer, cardiovascular disease and chronic lung disease in the country. Tower Hamlets also has amongst the highest infection rates of HIV, tuberculosis and sexually transmitted infections in London. Tower Hamlets has one of the highest proportions of years spent in disability, in the country, for males and females.

The relationship of the SAB and health partners, both commissioning and providing, is critical if we are to have an impact on improving the lives of adults.

GP patient registers reveal that Tower Hamlets has one of the highest rates of depression in London, at a rate of 10% (2010/11). Incidence of Serious Mental Illness (such as schizophrenia and bi-polar disorder) in Tower Hamlets, is the fourth highest in London, with the seventh highest rates of admission to hospital for mental health in London.

Tower Hamlets has slightly higher rates of severe disability in the working age population than the national average (4.1% compared to the national average of 3.6%).

1.6.3 Socio-environmental factors

40% of the population live in social rented accommodation compared to 24% in London and 35% are in overcrowded conditions, compared to 22% in London.

Welfare reform remains one of the biggest challenges facing Tower Hamlets, in terms of both the economic wellbeing of residents as well as the financial impact on the Council and housing providers. Led by Tower Hamlets Council, the Welfare Reform Task Group was created in 2011 to coordinate the work of local partners in responding to the changes by monitoring the impact of welfare reform on local people, supporting residents to respond positively and, where possible, helping to mitigate its effects.

The welfare reform agenda introduced under the Coalition Government was wide-ranging and affected in and out-of-work benefits as well as needs based entitlements (such as disability and housing benefit). Over 600 households in Tower Hamlets were impacted by the annual £26,000 'Benefit Cap', whilst 2,300 households lost income due to the introduction of the "bedroom tax". Locally commissioned research estimates that the cumulative impact of all welfare reforms to date has resulted in claimant households losing an average of £1,670 per year, or £32 per week in Tower Hamlets.

The government is committed to developing welfare reform further, with significant additional risk to Tower Hamlets residents and the local authority. The 'Benefit Cap' will be reduced to £23,000 per annum in autumn 2016, which is anticipated to negatively impact on over 1,000 households locally and the continued freeze of Local Housing Allowance (LHA) rates is driving growing levels of homelessness, with increasing numbers of households being placed in 'out of borough' temporary accommodation. In addition, the re-assessment of all claimants on Disability Living Allowance and Incapacity Benefit for transition to replacement benefits (Personal Independence Payments and Employment & Support Allowance) continues - resulting in significant emotional distress and anxiety for those affected.

To date, partners on the Welfare Reform Task Group have worked collaboratively to implement an ambitious 'Action Plan' to help residents affected by these changes. A series of projects have secured positive outcomes for 'at risk' residents, for example:

- 800 people have received one-to-one advice and support;
- £2.7 million provided via Discretionary Housing Payments (DHP) to help people maintain tenancies;
- An Integrated Employment Service has been developed to support those furthest from the labour market into work;
- A number of Digital Inclusion projects have been commissioned to support residents get on-line and develop their digital skill-set.

Going forward, the Welfare Reform Task Group will be reviewing its approach to take account of the emerging needs of the affected claimant population (more complex and harder to reach) and significant changes in the operating environment, with shrinking public resources likely to limit the breadth and effectiveness of mitigation interventions that can be undertaken by the statutory sector.

Over 5,500 people aged 65 and over live alone in Tower Hamlets (around 37%) and significant numbers of adults continue to report social isolation and loneliness. There are signs of a healthy economy, with the number of businesses trading in the borough increasing at a time when London as a whole has seen a decrease. At the same time there is concern about the high numbers of fast food outlets and the expansion of betting shops, pawnbrokers and payday loan shops.

Crime and antisocial behaviour remain major concerns for residents with 46% perceiving high levels of antisocial behaviour compared to 27% in London.

1.6.4 The Impact on Adult Safeguarding in Tower Hamlets

The range of information about the residents of Tower Hamlets indicates that there are high levels of adult vulnerability, and higher scope for risk of abuse, neglect and self-neglect. High levels of deprivation also mean that there is likely to be a higher reliance on public and voluntary sector services for support. This is a challenge at a time when statutory and non-statutory services experience continued pressure to achieve financial efficiencies and challenging performance targets.

The SAB must therefore ensure that all member organisations are co-ordinated in providing a robust response to safeguarding concerns, as well as effective preventative work, in accordance with the Care Act 2014.

In 2015/16 the SAB produced a strategy and associated business plan for the next four years, that not only has regard for the indicators summarised in this annual report but which also addresses the six key principles of safeguarding defined in the Care Act 2014. The strategy was benchmarked against those of five other authorities and whilst regarded as challenging by SAB members is also robust in supporting the SAB to deliver its objectives. Part of the purpose of this annual report will be to record the progress in completing the priorities for action associated with each of the six key principles of safeguarding.

Section 2: Progress on SAB Business Plan

The SAB Business Plan is structured around the Six Key Principles of safeguarding as defined by the Care Act 2014. The following section therefore highlights the work and achievements of the SAB and its member organisations over the past year in relation to the six key principles.

2.1 Priority 1 – Empowerment

2.1.1 The Association of Directors of Adult Social Services (ADASS) Peer Review was conducted in November 2015. The review was preceded by a casefile audit of local authority social care service user records in Framework-i. The audit and the subsequent review concluded that in terms of empowerment, there was clear evidence of good practice in relation to the 'Making Safeguarding Personal' agenda in some social work practice casework. It was also concluded that this practice could be recorded more easily by redesigning the safeguarding recording forms on Framework-i. The review team also concluded that staff who were interviewed showed a good understanding of person-centred and outcome-focused practice. A more detailed overview of the Peer Review is included in section 3.2. Local procedures and safeguarding recording forms have been developed to promote the recording of good practice in relation to making safeguarding personal. Social Work practice is expected to develop further through the use of the Practice Framework, which promotes a strengths-based and assets-based approach to working with vulnerable adults.

2.1.2 The local authority has created a Safeguarding Awareness and Communication Plan and toolkit and this will lead to a forthcoming public awareness raising poster campaign in November 2016 which will be repeated during Safeguarding Month in November.

2.1.3 The development of an overarching Quality Monitoring Framework will help Adult Services' Commissioners to make better use of the wealth of information and intelligence with providers so that we can work with them on improvements more proactively. The easy to use tools within the framework are specifically designed to empower individuals in their relationships with service providers.

2.1.4 The Metropolitan Police prevent and reduce the risk of significant harm to vulnerable adults from abuse or other types of exploitation while supporting individuals to maintain control over their lives. Each call to the service will allow a trained officer to interact with the individual where they will be supported and encouraged to make their own decisions, this will be fully documented within a safeguarding report (MERLIN) and consent from the individual requested to share the information. Two dedicated officers look at the Adult Safeguarding Merlins and pass them on to Adult Social Care and other relevant agencies. These two officers also feedback any qualitative issues to the creating officers. In Tower Hamlets supervisors are routinely expected to conduct dip samples, and identify if they believe an Adult Safeguarding Merlin should have been created and request the officer to do this, if it has not already been done. In the case of a crime, the Merlin reference needs to be added to the Crime Reporting System report. If there isn't one, this is followed up with the relevant officer and one is created. All reports entered onto Metropolitan Police Service systems, whether relating to missing persons, crime, anti-social behaviour or intelligence are

supervised, ensuring issues are picked up. From 01/01/16 to 23/06/16 a total of 1727 Adult Safeguarding Merlins were completed.

2.1.5 Safeguarding Adults at Risk Offenders in the Community with Care and Support Needs NPS Practice guidance (Jan 2016): Encourages staff to “Think Safeguarding Adults” at all stages of involvement with an offender from the PSR stage at Court through to community supervision, APs, Prisons. Links between Safeguarding Adults and domestic abuse, extremism, hate crime.

2.1.6 Safeguarding Month in November 2015 included presentations to service user groups in Sheltered Housing Accommodation to provide information about adult abuse and neglect and how to raise alerts.

2.1.7 The Fire Service has increased its provision of fire retardant bedding which helps to support many vulnerable people who can continue to live in their own homes, thereby promoting independence.

2.1.8 In November 2015 Barts NHS Trust implemented a new “Capacity to Consent to Admission and Treatment” form, for all admitted adult patients. The form is used across all Barts’ sites. Performance in relation to compliance with Deprivation of Liberty Safeguards has been the subject of an audit which reviewed 120 in-patient cases with diagnoses indicative of a possible mental disorder. Of these, it was found that 87 met the formal criteria for DoLS, and that DoLS applications had been made for 84 (97%) of cases. This compares with a compliance rate of just 73% which was found in the course of an earlier baseline audit.

2.1.9 In East London NHS Foundation Trust (ELFT) the Associate Director role includes giving advice to staff on individual cases where there is a degree of risk to service users. This can be wide ranging concerns from domestic violence, financial abuse, or Prevent (responding to service users who may be at risk of being radicalised into terrorism) or appropriate signposting to either legal, support services or other appropriate channels.

2.1.10 London Ambulance Service (LAS) has encouraged staff to have complex, challenging or difficult conversations with patients prior to making referrals, so that they are aware and included in that decision-making. This has been done to make the process more person-centred and to promote the objectives of “Making Safeguarding Personal”. This has resulted in an increase not only in the number of referrals made, but also an increase in the number of referrals made with the knowledge and consent of patients.

2.1.11 Toynbee Hall is a voluntary organisation that works to tackle poverty, and has conducted a series of eight workshops for service users in day services, sheltered housing and mental health project centres. 45 service users have participated in total. The sessions have promoted discussions and learning, so that participants become empowered to make decisions, and seek support where necessary. This work has been expanded to include people with learning disabilities. A key concern for many people with learning disabilities has been problems around finance and a better understanding around recognising financial abuse has enabled participants to recognise that it is abuse and should not be tolerated.

Similarly, Providence Row Housing Association delivered safeguarding briefing sessions to service users, including those being trained in volunteering roles within the organisation.

2.2 Priority 2 – Prevention

2.2.1 Adult Services in the Council have worked on strengthening the content of contracts for care services to improve clarity around the Council's expectations of providers with regard to safeguarding. In addition, the Council has been committed to running provider forums on quality and safety throughout the year in order to promote better partnership working, and to ensure timely information sharing in relation to changes affecting adult safeguarding.

2.2.2 Toynbee Hall have been running safeguarding awareness training to service users through the Dignify project. This has resulted in greater understanding amongst those who have attended and has generated examples of peer-to-peer information sharing and advice between service users. In one instance an attendee of a workshop was observed explaining financial abuse to another service user with a learning disability.

2.2.3 Tower Hamlets Clinical Commissioning Group (CCG) has provided training on safeguarding adults, Mental Capacity Act (MCA) and Prevent to over 70 GP's and other primary care professionals.

2.2.4 In relation to the Mental Capacity Act and DoLS, Barts has undertaken to develop awareness and understanding by training and educating the workforce. Barts therefore set training targets as part of their Commissioning for Quality and Innovation Scheme (CQUIN). These targets were exceeded. The Trust has delivered face to face training on MCA-DoLS to 2,800 staff since the Cheshire West ruling in 2014, with 2,100 of these receiving either initial or update training during the CQUIN period. Furthermore, to raise the profile of DoLS and increase understanding amongst staff a special awareness raising week which took place from 23rd November to 1st December 2015. It included implementation of a Trust wide screensaver promoting the 5 key principles of the MCA; distribution of mouse mats featuring the key principles of the MCA; canteen-based stalls held over lunchtime in each of the hospital sites, distributing information about DoLS and MCA in various formats, including posters, leaflets and information sheets. A high level open lecture on legal issues relating to DoLS was delivered by a partner from the Trust's external solicitors and a DoLS/MCA focused prize crossword in which all the answers could be found by reading a summary article on DoLS was designed. There were also additional open teaching sessions on MCA, implementation of an on-line DoLS/MCA competency assessment to complement training and study material relating to the week, including an interview with the Safeguarding Team MCA/DoLS lead, were published on the intranet.

2.2.5 The metropolitan Police Service uses a multi-agency partnership process through MASH to implement strategies to prevent harm and abuse from occurring or reoccurring, working with other agencies to identify those at risk at the earliest opportunity. Where necessary, referrals are made to the relevant forum (e.g. SAB, MARAC, ASB).

2.2.6 NPS London has produced a guide for probation staff working with suicide and Intentional Self-Injury. It gives frontline guidance for frontline probation staff on effective ways of working with individuals who are suicidal or intentionally injuring themselves. There

is a network of Safeguarding Adult Single Point of Contacts/leads within each cluster across the division. There are quarterly meetings for this group to discuss best practice and developments.

2.2.7 The London Fire Service has increased the number of Home Fire Safety Visits to 3449 in 2015/16 compared to 3351 in the year before. The Serious Outstanding Risk flowchart has also been embedded in practice to identify those most at risk.

2.2.8 ELFT's induction training for all staff covers Level 1 & 2 of the new NHS Intercollegiate document and therefore gives the widest possible access for early identification of any safeguarding concerns either internal or external to services.

2.2.9 Providence Row Housing Association has continued with the progressive implementation of multi-agency risk assessments in its services, to help identify risks that may be associated with abuse or neglect, to ensure proactive approach to prevention.

2.2.10 London Ambulance Service (LAS) has identified and taken action to address the difficulty that staff have whilst dealing with potential safeguarding concerns. These difficulties predominantly related to differentiating between safeguarding and general welfare concerns. LAS and now have a support system in place both for support in decision-making with regards to safeguarding, from senior clinicians within the organisation who are able to advise on difficult situations and the best course of action; as well as a dedicated group of staff who take details for safeguarding referrals over the phone. This means that staff can make 24/7 referrals from the scene of the incident if required and there is no need for them to travel to find a fax machine to send these through, as they are sent from a central location. This has again seen an improvement in the quality and number of referrals made. It has also increased the number of experienced staff able to answer questions if required. LAS has also provided each staff member with a specially designed pen, with a pull out section regarding the Care Act principles, to promote understanding and to improve practice.

2.3 Priority 3 – Proportionality

2.3.1 The local authority has been successful in recruiting, training and retaining Best Interest Assessors. A further 10 practitioners commenced training in November 2015 and the staffing in this area has ensured that the council's Adult Services Directorate can provide an effective and proportionate response to the growing demand for Best Interest Assessments.

2.3.2 The Council's Adult Service's commissioners have undertaken a review of all reported incidents to ensure a consistent and proportionate response across all supported housing provision. Commissioners also take a risk-based approach to monitoring using tracking reports, information from CQC and other sources.

2.3.2 To inform good practice in relation to hoarding, a review of hoarding policies by other boroughs has been conducted and a Hoarding Policy has been written, involving a practitioner toolkit with extensive guidance. The policy has been presented to the Good Practice sub-group and will be presented to the SAB for sign-off in 2016/17. This was done

to ensure robust arrangements for addressing hoarding which is defined as a type of self-neglect under the terms of the Care Act 2014.

2.3.4 The CCG has commissioned a project within East London NHS Foundation Trust to improve Mental Capacity Act practice, which has seen a significant improvement in MCA practice. During 2014/15, the CCG worked with East London NHS Foundation Trust to improve Mental Capacity Act (including DoLS) practice and leadership in inpatient wards, developing 16 MCA Advisors on the wards, who have trained 176 staff. In 2015/16, this leadership development approach has been rolled out across the whole organisation, including community and integrated care structures in Tower Hamlets, and included further research into current practice and the development of internal systems and processes.

2.3.5 The CCG have also used a high value CQUIN with Bart's Health to create an incentive for the Trust to further develop its Mental Capacity Act practice. This focuses on training and leadership development, as well as developing a better understanding of current practice through audits.

2.3.6 Providence Row Housing Association has developed practice amongst staff to working with challenging service users in the area of self-neglect, balancing support with the need for enforcement in their duty as landlords.

2.3.7 Training in ELFT ensures that staff are aware that not all risks require the implementation of the safeguarding procedures, in particular where a service user has mental capacity to understand and decide for themselves about any risks to their health and safety and in line with the personalisation agenda.

2.3.8 Toynbee Hall tailor the workshops described in section 2.1 according to the needs of different service user groups to help promote participation and engagement. This improves self-esteem and confidence so people are not needlessly scared about abuse. Care is also taken to discuss safety proportionally alongside risk, to support positive risk taking in developing service user independence.

2.3.9 There is a nominated lead for Safeguarding Adults in the National Probation Service in London, with a strong commitment to engaging in issues of abuse and neglect. This includes having senior managers as portfolio leads across a range of public protection areas – safeguarding children, adults, domestic abuse, Serious Group Offending (Gangs) and Central Extremism Unit. Senior managers are involved in a number of multi-agency forums regarding public protection.

2.4 Priority 4 – Protection

2.4.1 The Adult Service's commissioning management team are all DoLS signatories which means they are all authorised to sign-off deprivation of liberty authorisations. The management team review all assessments to ensure that service users are appropriately placed and protected in line with legislation.

2.4.2 To improve access to safeguarding services for all service users, a piece of community insight research was conducted at the end of 2015/16 to examine referral rates for

safeguarding amongst different ethnic groups. The research report and its findings will be presented to the SAB in 2016/17 together with recommendations for action by the SAB. However, in summary it was found that people from non-white ethnic groups are under-represented in safeguarding referrals, whilst conversely, the white British population is over-represented.

The table below compares the figures for the Asian/Asian British Population with the figures for London as a whole.

	LBTH Asian/Asian British Population	London Asian/Asian British Population
% of Total Population	41%	18%
% of all service users	30%	12%
% of Safeguarding Alerts	23%	9%

This shows that the level of under representation of Asian/Asian British people amongst service user users and safeguarding referrals is very comparable to the proportions of under representation for London as a whole. However, the under representation of such a large percentage of the total population of LBTH is of significant concern as the total number of people potentially affected is far higher.

2.4.3 During 2015/16 the CCG implemented Care and Treatment Reviews (CTR's) for people with learning disabilities and/or autism, with mental health conditions or behaviour that challenges. CTRs have been developed as part of NHS England's commitment to improving the care of people with learning disabilities and/or autism and with the aim of reducing admissions and unnecessarily lengthy stays in hospitals. CTRs bring together those responsible for commissioning services for individuals who are at risk of admission or who are inpatients in specialist mental health or learning disability hospitals, with independent clinical opinion and the lived experience of people with learning disabilities and/or autism and their families.

2.4.4 The CCG has also co-produced the Community Learning Disabilities Health Services Redesign. Incorporating safeguarding compliance into the coproduced patient outcomes framework the redesign requires the delivery of key outcomes related to supporting healthy and safe lifestyles, risk management and preventing harm.

2.4.5 Within Barts NHS Trust the CQUIN has demonstrated that the trust has been able to provide assurance that there is sufficient safeguarding/MCA DoLS leadership (including establishment of MCA-DoLS champions) to support MCA and DoLS. Together with the training and awareness raising described in section 2.2 above performance has improved with an increase of over 30% in the number of capacity assessments being conducted, and DoLS applications being made for 97% of eligible patients (CQUIN target of 95%).

2.4.6 This year ELFT has introduced the Routine Enquiry Domestic Violence training course for frontline staff who are given the opportunity to practice their skills in asking questions about a service user's experience of abuse or violence. This is for both victims and perpetrators to share information and be able to signpost appropriately.

2.4.7 London Ambulance Service has worked with staff to remind them that as they often attend people's homes on an unscheduled basis, they may be the only professionals with evidence and information which may prove to be vital safeguarding cases. In addition, LAS has made the referral process easier for mobile crew staff, which is predicted to result in an increase in referral rates in 2016/17.

2.4.8 Providence Row Housing Association has been introducing the use of money management agreements in a service which supports adults with varying mental capacity as a result of high level drug and alcohol dependency. These agreements help to provide consistency in approach in working with vulnerable adults and enables service users to adhere to the decisions that they make when they have capacity.

2.4.9 Safeguarding Adults is included in the NPS London Business Plan for 2016-17. There is a network of Senior Probation Officer and practitioner safeguarding adult single points of contact (SPOCs) within each cluster/business area. There are a number of policy documents and processes, and some in development which reflect the organisations commitment to safeguarding adults. These include: a NPS National Partnerships Framework for Safeguarding Adults Board, June 2015. *Safeguarding Adults – A quick guide* has been issued to all staff which reminds them of their responsibilities regarding safeguarding adults.

2.5 Priority 5 – Partnership

2.5.1 Following the publication of The London Multi-Agency Adult Safeguarding policy and procedures in February 2016, local procedures have been written for the Council's social care staff reflecting the changes associated with the London procedures. These will be implemented in 2016/17 together with the implementation of the revised safeguarding recording forms on Framework-i.

2.5.2 The Ensuring Quality framework within Adult Services' Commissioning and Personal Assistant e-learning project are both partnership developments that involve five other east London boroughs. Both projects offer opportunities to work in partnership with NHS Tower Hamlets CCG as the Council continues to work to develop an Integrated Personal Commissioning offer for individuals with more complex needs. The Council is, for example, discussing how the scope of the Personal Assistant e-learning package can be extended to provide training in the safe delivery of various health interventions. The Council is working with partners, members, CQC on further improving sharing information.

2.5.3 The Council is carrying out a joint commissioning review to deliver good quality, safe services across health and social care for the population of the borough.

2.5.4 The decision to renew the contract for the Kwango e-learning programme will enable staff from all partner agencies to access safeguarding awareness and alerter training. This will facilitate the training of large numbers of frontline staff who have historically had difficulties in accessing classroom training. The new version of Kwango will be available in 2016/17.

2.5.5 The terms of reference for the SAB have been revised and an exercise was undertaken resulting in the re-design of the sub-group structure of the SAB. The new sub-group structure has been designed to ensure that every item on the business plan is allocated to at least one sub-group to deliver on the priorities of the SAB.

2.5.6 As part of a Multi-Agency Support network the Metropolitan Police Service works in partnership with the individual, family, carers and other partner agencies to ensure best consented outcome for the individual. All action is documented through both Merlin and crime reports where there is a responsibility to adhere to the victim code of practice around regular contact

2.5.7 The Safeguarding Adults Lead for the CCG is a partner member of both the Community Safety Partnership and the SAB. Of note, is the fact that the Mental Health Commissioning Post, which incorporates the safeguarding responsibility, is a Joint Commissioning Post with the Local Authority.

2.5.8 Effective interagency working is also demonstrated by the CCG through the inclusion of the Adults Lead in the review panel for 2 Safeguarding Adults Reviews currently underway which have been commissioned by the local authority under the instruction of the SAB; and with the Mental Health Commissioning Post retaining a lead responsibility for the authorisation of Deprivation of Liberty Assessments for the Local Authority.

2.5.9 Following a serious incident in a Providence Row Hostel a service level agreement has been set up between Providence Row and the CMHT to promote partnership working in high risk cases. This is applied to all cases where hostel residents are subject to the Care Programme Approach (CPA). Although the agreement was initiated between Providence Row and the CMHT, this good practice has now been extended to all hostel providers. In particular the agreement promotes good information sharing and participation and engagement in CPA meetings.

2.5.10 In 2015/16 Toynbee Hall conducted its service user workshops in a range of locations including sites operated by other service providers. There are plans to expand the delivery of workshops on a wider range of sites in 2016/17.

2.5.11 ELFT has supported the sub-group structure of the SAB by chairing the Good Practice and Training sub-group throughout 2015/16.

2.5.12 When Probation officers consider that offenders may fall under the remit of the Care Act, they will refer them to the Safeguarding and Mental Capacity Team in Tower Hamlets. A recent MAPPA level 3 case being managed by NPS between two boroughs (including Tower Hamlets) required the involvement of the Safeguarding and Mental Capacity Lead for Tower Hamlets. As a result of NPS's request for the attendance of this professional a referral

to a neighbouring borough's CMHT has been facilitated via the offender's GP for an assessment for Aspergers/Autism to ease access to support services and assessment resettlement plans. Like MARAC, some of the actual or potential perpetrators of abuse and neglect may be subject to Multi- Agency Public Protection Arrangements (MAPPA). These are arrangements to manage the risk posed by serious sexual or violent offenders, including those who may also be the subject of a MARAC or an abuser within safeguarding processes. Practitioners and managers involved in safeguarding adults cases in NPS are expected to be familiar with the existing MAPPA strategy as found on our intranet NPS sites.

2.6 Priority 6 – Accountability

2.6.1 The SAB clearly recognises the need to be visible, and engage with frontline teams. On that basis, a clear reporting pathway has been created between the SAB and frontline social care teams in the form of quarterly visits to frontline teams by the strategic safeguarding manager to provide updates and question and answer sessions. The full SAB strategy and business plan have been presented to teams, and teams have been briefed that the direct point of contact for matters relating to the SAB and safeguarding strategy is the strategic safeguarding manager.

2.6.2 A new Quality Assurance framework for the SAB was drafted in September 2015 and agreed by the SAB in December 2015. The framework is designed to enable the SAB to ensure that local safeguarding arrangements are effective and deliver improved safety and outcomes for the people of Tower Hamlets. The framework will be used to hold local agencies to account for their safeguarding work including prevention and risk management.

2.6.3 A review of standard agenda items for the SAB was conducted in December 2015, and this will be reviewed again in 2016/17 following the appointment of the new SAB Independent Chair.

2.6.4 A full review of the membership of the SAB was conducted by the SAB Independent Chair and strategic safeguarding manager in October 2015. The aim of the review was to ensure that members were of sufficient seniority within their organisation to make decisions relating to the SAB and achieve a better balance of representation between the member organisations, reducing over representation by the local authority. The revised membership is reflected in the Terms of Reference.

2.6.5 As detailed below (section 3.1), 12 member organisations of the SAB participated in the annual self-audit and peer review challenge.

2.6.6 The SAB Strategy for 2015-2019 was drafted and subsequently agreed by the SAB. The strategy has an associated business plan and all items from the business plan have been allocated to at least one sub-group to ensure delivery of the plan. The business plan is updated once a month as a minimum to ensure progress is recorded.

2.6.7 Governance arrangements for the SAB have been recorded in the strategy, the annual plan for 2014/15 and in this annual report in Section 1.2. The annual report for 2014/15 was written in accordance with the requirements of the Care Act and the business plan.

2.6.8 The Safeguarding Adults Associate Director for ELFT delivered a presentation to the Trust Board this year to update them on the changes responsibilities following the implementation of Care Act. There continue to be bi-monthly Trust Safeguarding Adults Committee meetings to be aware of safeguarding incidents and to make appropriate decisions.

2.6.9 The CCG holds health care providers to account through regular reviews of safeguarding adults arrangements, activity and governance. This is done through the CCG's regular contractual quality assurance meetings, and the CCG has key performance indicators to monitor Mental Capacity Act/DoLS activity as part of the contracts for 2015/16.

2.6.10 Over the course of this year, we have worked with providers to implement the recommendations of Clinical Treatment Reviews; in 2015/16 there were no people with a learning disability funded by the CCG placed in an assessment and treatment centre, or long stay hospital placement.

2.6.11 The Metropolitan Police Service ensures that records are kept of interaction between the vulnerable and the agencies tasked to protect and safeguard them, creating accountability for actions and ownership. MERLIN reports of each incident are created, researched and shared when appropriate allowing for full transparency of police involvement and decision making.

2.6.12 Providence Row Housing Association has amended its safeguarding procedures to include a duty of candour in relation to the reporting of safeguarding concerns.

2.6.13 Providing meaningful statistics in respect of Safeguarding Adults is being reviewed as part of the NDelius Offender contacts database the NPS uses. Some contacts are being tested, such as contact details, registrations and flags. NPS will be holding thematic case audits focusing on Safeguarding Adult cases, and will specifically review referrals during the latter half of 2016, once we have meaningful data. The NPS's organisational culture supports reflective practice, case auditing, and in ensuring lessons are learnt and best practice shared internally and externally. The findings from Serious Further Offences, MAPPA Serious Case Reviews are shared internally and where appropriate with external partners.

2.7 Priorities for 2016/17

On 11th May 2016, the SAB convened a workshop to support the launch of the Pan-London Procedures. As part of the workshop, participants were asked to give views on priorities for 2016/17. In addition, member organisations were invited to give views on priorities when submitting their returns for this report. These are detailed below and categorised according to how they relate to each of the six principles of safeguarding, and will be built into the business plan:

2.7.1 Empowerment

- To develop and improve service user engagement and service user feedback mechanisms.

- The 'I' statements in the Real plan should be the focus, coming from this point of view will encourage and ensure appropriate engagement with people, and interaction within meetings, more focus on gathering people's views at all levels
- Raising public awareness by the provision of accessible information and advice to help adults, families and carers prevent abuse or neglect from happening.

2.7.2 Prevention

- Care providers should equip their staff with a checklist of what to look for and a flowchart of what action to follow if they consider one of their clients is in need of a Home Fire Safety Visit or additional measures to ensure that person is safe from the dangers of fire within their own home.
- Keep a stock of fire retardant bedding within the offices of social services to ensure the most vulnerable people in our community have access to this product immediately a need is identified. This stock can then be replenished by the LFB once all protocols and a business plan for after care have been established.
- THCVS think there is a clear requirement for better training for voluntary and community groups on safeguarding. At the moment access to training is difficult, particularly for smaller groups and groups not receiving council funding.
- The provision of PREVENT training is a key priority and further guidance in devising policies and procedures for each partner on the SAB.
- A review of safeguarding training programmes in all member organisations, and sharing the learning between agencies and multi-agency training

2.7.3 Proportionality

- A continued focus on adults with learning disabilities admitted to assessment and treatment units, expanding this to those at risk of admission which is more of an issue for Tower Hamlets.
- In the light of the Care Act and subsequent revision of the Pan London Procedures, it is important that all partner organisations have a clear and shared ownership regarding the definition of safeguarding and who meets the criteria.

2.7.4 Protection

- Provide all carers with a laminated visual guide to what constitutes hoarding

2.7.5 Partnership

- Sharing learning between agencies and multi-agency training
- Embedding close working relationships across the partner agencies following any recent new members.

- The Board meetings cover a vast amount of business, and in light of the Audit findings, there might not be enough understanding of what everyone actually does in their day job, and if there could be time to explore this, it can lead to more partnerships being developed. E.g. hearing more from the Fire Service about their findings, and how best to link with them to support them and the individuals they find who they identify at risk.
- Developing a partnership approach to the collection and analysis of quality & performance data. Develop systems that allow the identification of patterns and trends including low level concerns, and promote learning from Safeguarding Adults Reviews.
- Developing the local partnership approach to the PREVENT programme through improved integrated and joint working.

2.7.6 Accountability

- Require care providers to instruct all their staff in the protocols surrounding what constitutes a Fire Risk (cigarette burns in carpets, overflowing ashtrays, unattended cooking etc.).
- To develop a multi-agency performance dashboard in collaboration with other local authorities.
- Carry out quality control checks to ensure their staff have a copy of the guide and a copy of the flow chart for HFSV referral.
- Understand better the referral patterns into the safeguarding process, including areas of potential under representation, and ensure that any issues emerging from this understanding are addressed robustly by all SAB partners.

Section 3: Scrutinising the Effectiveness of Safeguarding Adults

3.1 Self-Audits

The annual self-audit challenge was completed using the Safeguarding Adults at Risk Audit Tool. The tool was developed by the London Chairs of Safeguarding Adults Boards (SABs) network and NHS England London. It reflects statutory guidance and best practice. The aim of the audit tool is to provide all organisations in the borough with a consistent framework to assess, monitor and/or improve their safeguarding adults arrangements. In turn this supports the SAB in ensuring effective safeguarding practice across the borough.

The purpose of the tool is to provide the SAB with an overview of the safeguarding adult arrangements that are in place across the locality identifying:

- Strengths, in order for good practice to be shared

- Common areas for improvement where organisations can work together with support from the SAB
- Single agency issues that need to be addressed
- Partnership issues that may need to be addressed by the SAB.

The audit tool is a two-part process:

1. Completion of a self-assessment audit
2. A safeguarding adult board challenge and support event.

The challenge and support event took place on 7th and 8th March 2016 and saw a panel convened and chaired by the Independent Chair to discuss the content of the audit tools with SAB members from the respective organisations.

Representatives from 12 organisations attended in person for about an hour each or by telephone or submitted written reports:

- LBTH Adult Social Care
- Providence Row Housing
- Tower Hamlets CVS
- Toynbee Hall
- Barts Health NHS Trust – Acute Care and Community Health
- East London NHS Foundation Trust (Mental Health)
- London Fire Service (Tower Hamlets)
- Age UK
- Met Police
- LBTH Community Safety
- National Probation Service (Tower Hamlets)
- London Ambulance Service

Following the challenge and support event an overview report was produced identifying a range of themes. The report highlighted the fact that the majority of the written submissions were of a very high standard, although a few were somewhat lacking in detail. It was also observed that there was inconsistency in the level of seniority in terms of attendance at the challenge panel and also in the process of signing off the written submissions. The report also highlighted the need for the SAB and its members to develop their understanding of the service user/patient experience in the course of adult safeguarding work.

3.2 ADASS Sector-Led Peer Review

3.2.1 In November 2015, ADASS conducted a Sector-Led Peer Review of adult safeguarding arrangements in Tower Hamlets. The review was conducted over two days by a team of senior managers from adult social care departments in other local authorities. ADASS is a charity and the association aims to further the interests of people in need of

social care by promoting high standards of social care services and influencing the development of social care legislation and policy. The membership is drawn from serving directors of adult social care employed by local authorities. The review was undertaken as a result of a decision taken by ADASS that all London boroughs would commit to taking part in a review of an aspect of adult social care services by March 2016. The aim of the review is to be an opportunity for external challenge and critique by peers experiencing similar challenges, and reviews are considered an opportunity for sharing and mutual support. Adult safeguarding was selected as the theme of the review as Tower Hamlets Council wished to evaluate the success of the implementation of its new duties under the Care Act 2014.

3.2.2 The review was preceded by a self-assessment relating to the quality of practice based on an audit of 30 service user records. The audit concluded that overall adults in Tower Hamlets are safeguarded when referred to operational teams. With regard to the Making Safeguarding Personal agenda, the quality of recording varied considerably with some cases demonstrating excellent recording and a small number with poor recording. The audit recommended a review of the forms used to record actions to facilitate the recording of person-centred and outcome-focussed practice.

3.2.3 Similarly the peer review findings were generally positive and evidence of good practice was reported, especially in relation to the use of the Signs of Safety tool to support practice. It was concluded that staff understand person-centred and outcome-focussed practice, are committed to it and could describe how they apply it to their practice. Furthermore, the team were impressed by how well the Care Act had been implemented. Performance in relation to Deprivation of Liberty Safeguarding was praised, together with the strength of leadership and support from the Cabinet Member for Adult Social Care. Feedback from the review team was delivered via a presentation to Tower Hamlets Adult Social Care Managers and the Cabinet Member, and the recommendations have subsequently been linked to six key themes to support service development. These themes are:

1. Role and Function of the DoLS Team/Staff Resourcing
2. Performance and Quality Assurance
3. Advocacy
4. Training and Practice Development
5. Policy and Procedures
6. Communication and Engagement

3.2.4 An action plan has been drawn up to address the recommendations made by the team, and required action will be managed by the Principle Service Managers Team Meeting, led by the Service Head for Adults' Social Care. Progress will also be monitored by the Adults' Services Directorate Management Team Meeting with oversight from the SAB. The action plan will be appended to the SAB Business Plan. Practice is further expected to be improved through the Practice Framework for social care staff which promotes strengths-based and assets-based practice.

3.3 Deprivation of Liberty Safeguards (DoLS)

Deprivation of Liberty Safeguards (DoLS) came into effect on 1st April 2009. They are designed to protect the human rights of adults without Mental Capacity by providing for the lawful deprivation of liberty of those people who lack the capacity to consent to arrangements made for their care or treatment in either hospitals or care homes, but who need to be deprived of liberty in their own best interests, to protect them from harm.

The local authority has lead responsibility for administering and managing this service, and for ensuring that any deprivation is properly authorised and reviewed. Six assessments must be completed before a local authority can assure itself that the necessary requirements are met and an authorisation of the deprivation of liberty can be granted. The Local Authority has a statutory duty to ensure that where a person has no family or friends to represent them, an Independent Mental Capacity Advocate (IMCA) and Paid Representative are commissioned to support the person during the assessment process and for the length of the authorisation itself.

The Safeguarding Board has a responsibility to oversee how these duties are carried out and receive regular reports on the use of restrictions or restraints granted by the authorisation of a DoLS order by the supervisory body (the Local Authority).

3.3.1 The Supreme Court (Cheshire West) Judgement

On 19th March 2014, the Supreme Court handed down a judgment in the case of “P v Cheshire West and Chester Council and another” and “P and Q v Surrey County Council”.

The judgment clarified what is known as the test and definition for Deprivation of Liberty for adults who lack capacity to make decisions about whether to be accommodated in care. Using the acid test for a deprivation, a person is now deemed to be deprived of their liberty if they are; under continuous supervision and control, are not free to leave, and if they lack the capacity to consent to these arrangements.

The ruling also determined that people in other settings such as Supported Living environments or living in their own homes, could, in certain circumstances be deprived of their liberty. Deprivations of liberty in these settings must be authorised by the Court of Protection as opposed to using the DoLS process.

As a result of these changes a much greater number of people are now subject to a deprivation of liberty and now come under the protection of DoLS.

3.3.2 The Effect of the Cheshire West Judgement.

It is positive that a greater number of people now fall under the protection of the safeguards. However, the ruling has had a significant impact on Local Authorities and Managing Authorities (Hospitals and Care Homes) and on IMCA services across the country. Tower Hamlets saw a twenty-fold increase in the number of referrals received in 2014/15 in comparison to the previous year; receiving 585 applications as compared to 28 in 2013/14, this was significantly better than the ten-fold increase seen in most Local Authorities.

In 2015/16 overall, there have been 885 referrals, although this does include a number of short orders while awaiting for a small number of families or IMCAs to consult with. This shows a further five-fold increase in referrals over the year.

3.3.3 Number of standard and urgent applications

Total Number of DoLS referrals	Total numbers of DoLS authorised	Total numbers of DoLS not authorised	Total numbers of DoLS withdrawn	Total numbers of DoLS not authorised or withdrawn
885	613	83	189	272

In 2015/16 the Borough received a total of 885 requests for DoLS Authorisations or reviews. Of these, 613 were authorised with 83 not being authorised. Those not authorised were mainly due to the person being assessed as failing to meet the eligibility criteria i.e they had Mental Capacity to agree to being in the care home or hospital. Those withdrawn are due mainly to people being discharged from hospital, dying and in respect of the Royal London, transfer to Mile End Hospital which for the purpose of DoLS is seen as a discharge.

3.3.4 Number of DoLS referrals received: overall, from care homes, from hospital

Total Number of DoLS	Number of DoLS Referrals from care homes	Number of DoLS Referrals from hospital
885	411	474

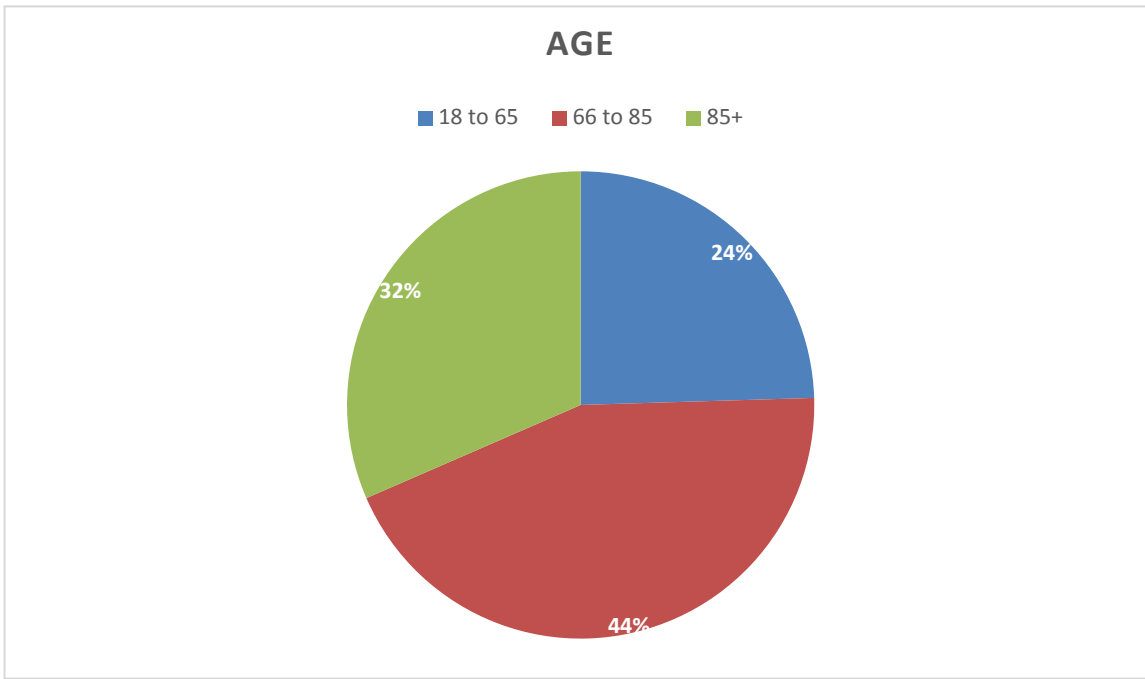
Of the 885 requests for authorisation or review 411 came from care homes and 474 from Hospital

3.3.5 Number of applications authorised and not authorised

Number of DoLS referrals from care homes authorised	Number of DoLS Referrals from care homes not authorised	Number of DoLS Referrals from hospital authorised	Number of DoLS Referrals from hospital not authorised or withdrawn
363	48	250	224

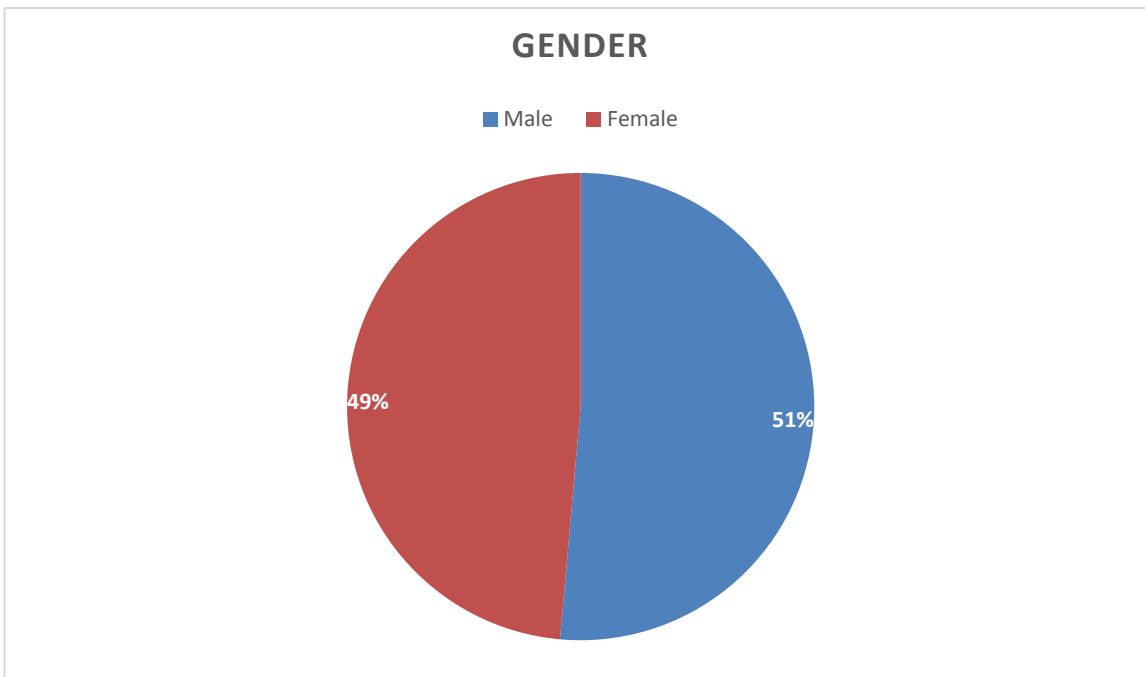
Total numbers of DoLS authorised	Total numbers of DoLS not authorised or withdrawn
613	272

3.3.6 Applications by Person's Age



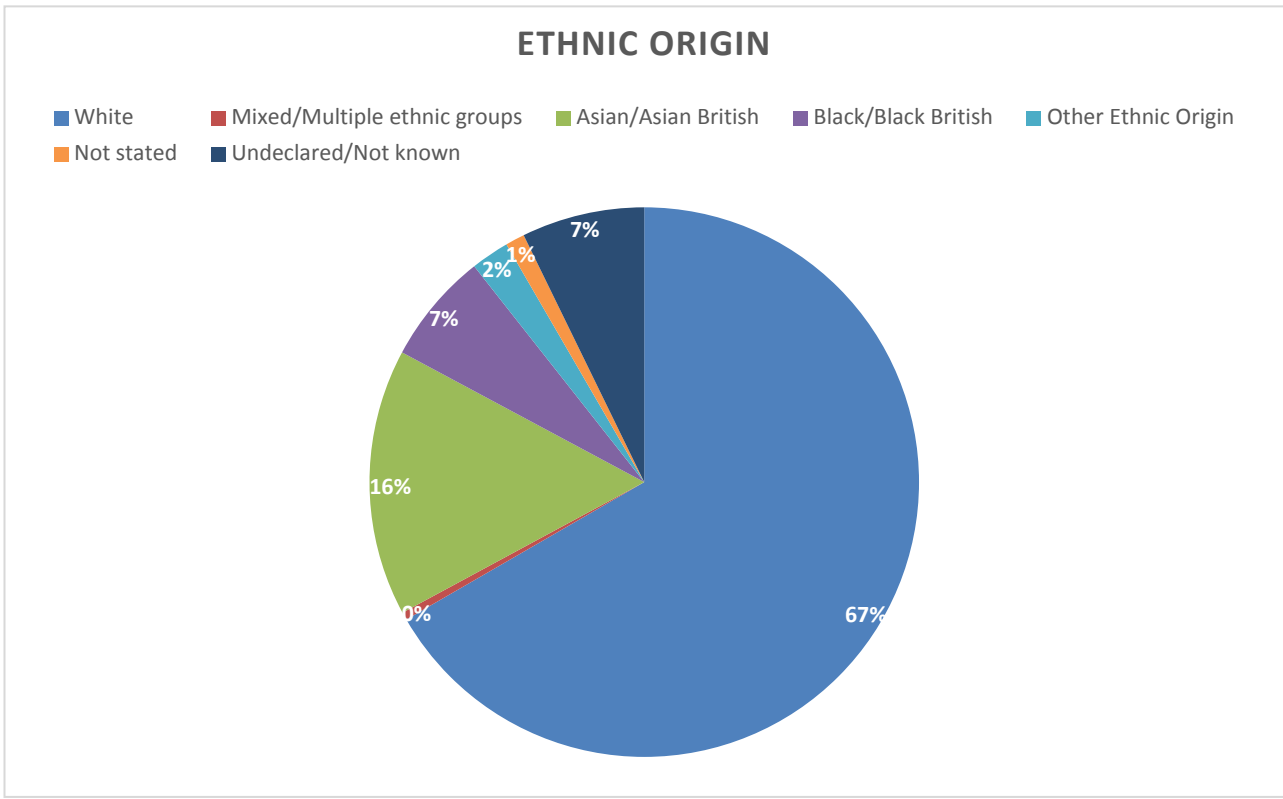
The majority of people who are referred for DoLS (76%) are aged over 65 years. This is understandable as the likelihood of losing mental capacity increases with age.

3.3.7 Applications by Person's Gender



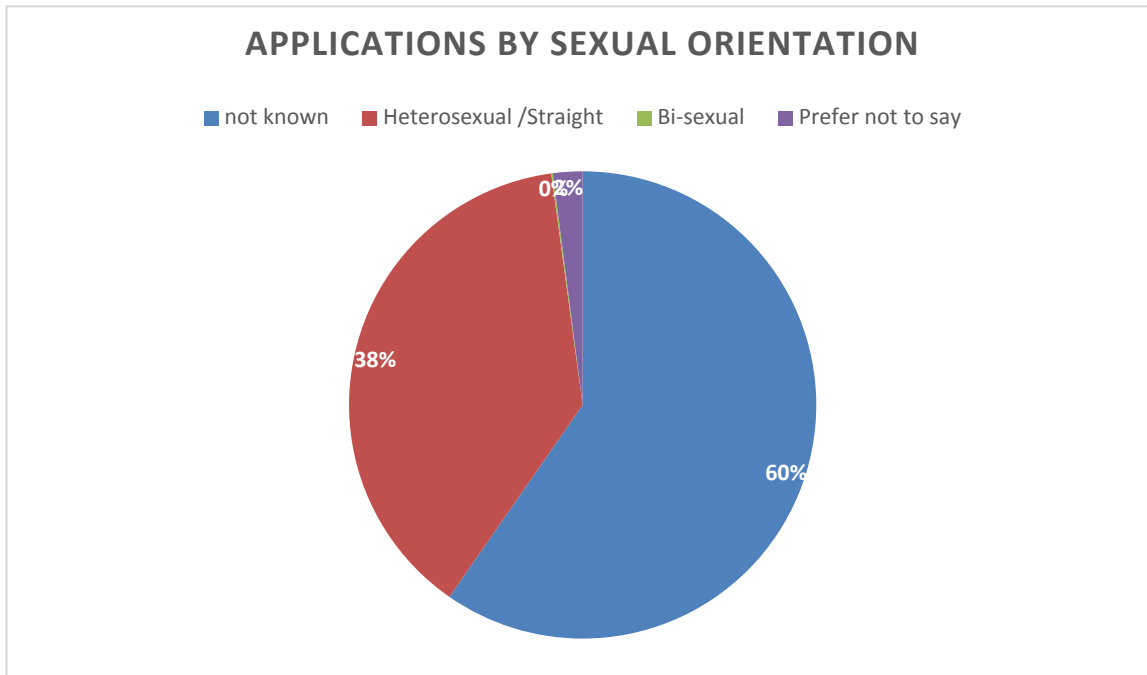
In relation to the referrals for DoLS, a total of 455 were for men against 430 for women.

3.3.8 Applications by Person's Ethnic Origin



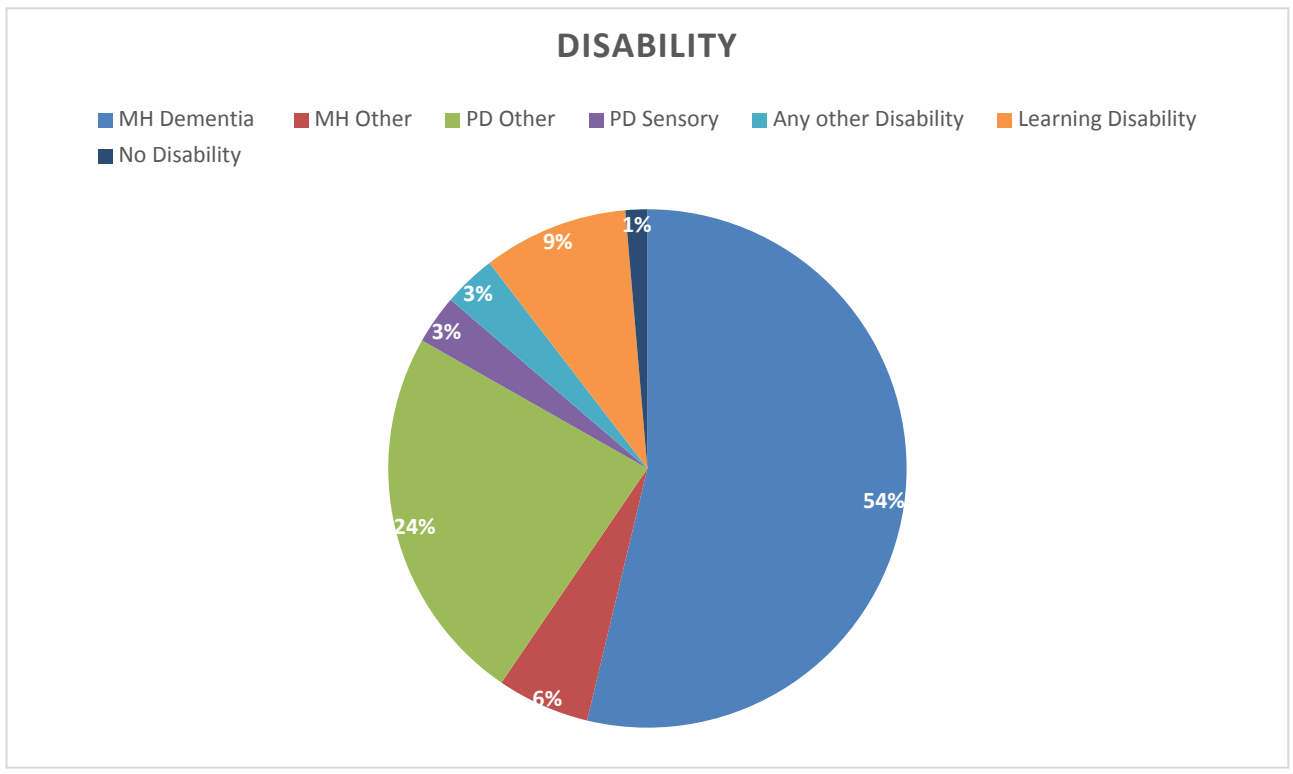
This chart shows the Ethnic Origin breakdown of the people referred for DoLS, who are in a care home or hospital, and it shows 67% are identified as white, with 16% being described as from an Asian or Asian British background.

3.3.9 Applications by Person's Sexual Orientation



This chart shows the breakdown of referrals by sexual orientation.

3.3.10 Applications by Person’s disability



This chart shows what the Managing Authority (referrer) identifies as someone’s primary disability; the majority of people when referrals are made are identified as having dementia (53%). While the person being referred must have mental disorder as defined under the Mental Health Act 1983, the DoLS referral forms collect information on any other disability that the person has. The Majority of people being referred for DoLS have Dementia (54%) with a further 6% having another Mental Health condition, 9% of people referred for DoLS have a Learning Disability.

3.3.11 Use of IMCAs

When someone who has been referred for DoLS has no one who can be consulted about the deprivation a 39A, an IMCA must be appointed to support and represent the person during the assessment process where there is a request for a standard authorisation. The assessors are required to have regard to any representations they make. Tower Hamlets have commissioned 39A IMCAs on 227 occasions while undertaking assessments for Standard Authorisations.

3.3.12 DoLS through the Court of Protection

A small number of people were referred to the Court of Protection when they were disputing the DoLS Authorisation. One of the Safeguards for DoLS is if the person who is under DoLS disputes the Authorisation, then there is an application to the Court of Protection.

Tower Hamlets also one of the Local Authorities that made an application under what is known as the Re X process to determine the Court of Protections “Fast Track” for people who meet the criteria for DoLS but do not live in Care Homes or Hospitals process was lawful, the Court found that each person going through this process must have what is called a 3A Representative and because most people do not the Court has “stayed” all present applications which do not have a 3A Representative. The Local Authority will be referring a number of people who need the criteria for what is called Community DoLS in 2016/17.

3.4 Legal Cases – Summary

There have been no Adult Safeguarding cases which have been subject to legal challenge in 2015/16.

3.5 Safeguarding Adults Reviews

SABs are under a duty to commission Safeguarding Adults Reviews (SARs) under the terms of section 44 of the Care Act 2014. The following cases were initially reviewed in accordance with the Local Safeguarding Adults Review Protocol and were deemed to meet the criteria for full reviews. As detailed below the completion of the SARs will help to ensure that practice, policy and procedures across all relevant member organisations can be further developed to safeguard adults adult risk of abuse or neglect.

3.5.1 Safeguarding Adults Review re: Mrs. A - Executive Summary

3.5.1a Case Summary:

Mrs A, a woman in her late eighties, was found dead in her home by a relative in February 2014. Mrs A had lived alone for some years and was assisted by a range of health and social care services, having experienced a gradual decline in her health and ability to manage her care needs during 2012 and 2013. In January 2014, Mrs. A was admitted to hospital for a period of two weeks. She was assessed as needing additional support to enable her to return home but, in error, none of the social care or health services which supported her had been re-commenced on her discharge from hospital some days previously. At the inquest held in January 2015, the cause of death was confirmed as diabetic ketoacidosis – a life-threatening complication of diabetes caused by a lack of insulin. The coroner confirmed the patient’s cause of death was due to natural causes to which neglect contributed.

3.5.1b Learning From Experience/Recommendations:

- i. The Board should require Barts Health to demonstrate that they have made failsafe arrangements for ensuring that referrals to community health services have been received and acted upon.
- ii. The Board should require the London Borough of Tower Hamlets to demonstrate that there are sound arrangements in place for liaison with relatives when vulnerable adults are discharged from hospital.
- iii. The Board should require the London Borough of Tower Hamlets to demonstrate that that they have made failsafe arrangements for ensuring that domiciliary care services have been received and acted upon.
- iv. The Board should require the London Borough of Tower Hamlets to demonstrate that their contractual arrangements with providers ensure that all staff is trained in dealing with “failed visit” situations, and that this is appropriately monitored.
- v. The Board should ensure that the Care Quality Commission is aware of the concerns about the performance of Agency X which arise from this review require the London Borough of Tower Hamlets to review its contractual arrangements with Agency X, with particular reference to the issues arising from this review.
- vi. The Board should require the London Borough of Tower Hamlets to demonstrate that they have made arrangements which will ensure that, in the event of any subsequent Serious Adult Review, they are able to provide a professionally sound and timely contribution to that review.
- vii. The Board should ensure that the Care Quality Commission is offered the opportunity to participate in any subsequent SAR.

3.5.2 Safeguarding Adults Review re: Mr. K - Executive Summary

3.5.2a Case Summary

Mr K, a man in his sixties, died in late 2014 after suffering serious burns in a fire in his home. He had lived alone in sheltered accommodation since 2008, having previously been homeless, and misusing alcohol, for some years. Whilst it appears that during the early years of his tenancy Mr. K managed reasonably well, from the summer of 2012 there was increasing evidence of him experiencing difficulties in managing his domestic affairs, and of his health deteriorating rapidly since January 2013. A range of health and social care services were in touch with him but he was a very strong character with no family, who often refused attempts to help and support him.

3.5.2b Learning From Experience/Recommendations

- i. Improve understanding of fire safety awareness amongst frontline staff.
- ii. A need for a clear understanding of the formal designation of sheltered accommodation, and the consequences of that for fire safety precautions.

- iii. A need to ensure an understanding of the safeguarding implications of self-neglect and how to assess the associated risks.
- iv. Establish robust arrangements for assessing mental capacity especially in situations where capacity may fluctuate and implications of risk are not fully understood.
- v. Ensure a clear understanding of when and how to refer people to alcohol services.
- vi. Create robust arrangements in statutory and non-statutory agencies for escalating concerns about cases to partner organisations.
- vii. Develop systems to co-ordinate input across all relevant agencies.
- viii. Need to conduct thorough assessments and ensure robust support, supervision and management by the SAM.
- ix. Review arrangements within the district nursing service to ensure adequate contact and monitoring and improve practice.
- x. Need to initiate SARs in a more timely fashion and secure improved contributions from all relevant agencies.
- xi. The Board should use this case review to promote a better understanding of self neglect, and how best to respond to it, across all partner agencies.
- xii. London Borough of Tower Hamlets to demonstrate that, where a vulnerable adult may be at risk through self-neglect, this is recognised, investigations and assessments are conducted without delay and all procedural and good practice requirements are met.
- xiii. Barts Health to demonstrate that the Community Nursing service is meeting all the requirements of good professional practice when working with vulnerable adults who may be neglecting themselves.
- xiv. Key partner agencies to consider setting up Community Multi-Agency Risk Assessment Conference (MARAC) arrangements. These would provide a forum for discussing and developing risk management plans for people who are hard to help, including people who would not normally meet the threshold for care management services.
- xv. All partner agencies to promote staff understanding of mental capacity, including;
 - the need for statements or decisions about capacity to be evidenced.
 - how capacity can fluctuate .
 - the requirement to ensure that individuals are made aware of the implications of potentially unwise decisions.
- xvi. Promote arrangements where in complex situations, agencies consider appointing a key worker to co-ordinate the services' response.

- xvii. All services provided or commissioned by Board partners should empower their staff to escalate concerns to more senior managers where those staff are concerned about decisions made by partner agencies.
- xviii. The Board should work with the relevant agencies to develop appropriate range of service responses to those whose use of alcohol is causing serious harm. Alcohol services should also recognise their expert role in signposting to more appropriate agencies if they receive a referral which does not meet the criteria for their service.
- xix. The Board should work with the London Fire Brigade to develop and promote clear and well-publicised arrangements for individual fire safety assessments in respect of vulnerable adults.
- xx. The Board should work with the London Fire Brigade and other relevant agencies to ensure that there is clarity and consensus about the nature and designation of residential services and sheltered housing provision, and any consequent duties or requirements.
- xxi. The Board should require the London Borough of Tower Hamlets to demonstrate that they have made arrangements which will ensure that, in the event of any subsequent Serious Adult Review, they are able to provide a professionally sound and timely contribution to that review.
- xxii. The Board should ensure that the Care Quality Commission is offered the opportunity to participate in any subsequent SAR.

3.5.3 Next Steps

The completion of the SARs has resulted in the production of clear action plans to address the learning points and recommendations from the two reports. These have been drawn up by the local authority and will be developed in partnership with the other agencies involved in each of the cases. Progress on the action plans will be monitored by the SAR sub-group and by the SAB. The cases will be used as case studies which will be discussed in team meetings with frontline social care staff. The reports have also been shared with SAB member organisations to review the cases to facilitate a cascade of the learning points within their respective organisations.

3.6 Safeguarding Adults Referrals

This section of the report presents provisional information for 2015/16 in relation to safeguarding adults. The Council, in its lead role for safeguarding, has an overview of all safeguarding alerts received within the area, and as such data from the Council's case management systems has been used to inform this section of the report. It gives an overview of referrals that have been received and the investigations that have been concluded.

The full data reports are presented in charts as Appendix 2 to this report.

Safeguarding adult referrals

Number of referrals

- a) In 2015/16, 467 safeguarding referrals were recorded in Tower Hamlets¹.
 - The number of referrals has decreased slightly compared to the previous year when 492 referrals were made in Tower Hamlets. The figure amounts to 211 per 100,000 of the population, which is below the England average (242)².

Who is being referred?

- Most safeguarding referrals relate to individuals 'already known to the Local Authority'. 12% were not known to LBTH in 2015/16, which is the same percentage as last year.
- 54% of 2015/16 referrals related to women, which is down one percentage point from the previous year. The proportion of the borough's adult population who are female is 48%, suggesting an over representation of women in referrals.
- 55% of 2015/16 referrals related to older people (over 65), which is down two percentage points compared with the previous year. This is slightly below the profile of social care service users, 62% of whom are over 65.
- 58% of 2015/16 referrals related to people from a 'white' ethnic background. This has increased by two percentage points compared with the previous year. The 2015/16 figure is lower than the England average for 2014/15 (85%) but is higher when compared against the overall profile of the borough (45% 'white' in the last Census). However, 63% of the older population in Tower Hamlets are white and as noted above, most safeguarding referrals come from this group. More work is needed to understand if there are any issues of over or under representation in safeguarding referrals based on ethnic background, and this has been the subject of a piece of Community Insight Research which will be presented to the SAB in 2016/17.
- 54% of 2015/16 safeguarding referrals related to people requiring physical support. This compares with 40% across England. In Tower Hamlets, 24% of referrals related to individuals with learning disabilities and 10% related to individuals with mental health issues. This compares with 15% and 12% in England.

¹ It should be noted that this is provisional data based on the LBTH Safeguarding Adults Collection Return 2015-16

² Adult population (18+) in England – 42,724,917
Number of safeguarding referrals across England – 103,445
(103445/42724917*100000=242)

3.7 Safeguarding Adults Enquiries

521 adult safeguarding enquiries were undertaken and concluded in 2015/16; a decrease when compared to the figure of 579 for 2014/15.

Where abuse takes place

Based on concluded safeguarding investigations, the majority of safeguarding issues take place in the alleged victim's own home. The figure is 54% in Tower Hamlets, which is lower than the 2014/15 result of 62% but higher than the 2014/15 England average of 43%. A smaller group of people are in care homes: This figure was 16% for 2015/16 and 15% in 2014/15. The England 2014/15 figure is 36%. More work is needed to understand the difference in figures between Tower Hamlets and the England average, and this will be the subject of community insight research in 2016/17.

Types of abuse

Neglect was the largest single type of abuse investigated in Tower Hamlets in 2015/16 at 38%, this is a change from last year where physical abuse was the largest single type of abuse recorded and neglect accounted for 27% of the overall total. The England average for 2014/15 was 32% for neglect (also the highest type of abuse investigated). Physical abuse accounted for 27% of investigations in Tower Hamlets in 2015/16, compared to 30% last year. Financial abuse investigations in Tower Hamlets remain the same at 21% for years 2015/16 and 2014/15 respectively. However, there has been a slight decrease nationally for 2014/15 (from 18% to 17%).

Mental capacity and advocacy

359 (69%) individuals were assessed as 'not lacking capacity' and were thus deemed able to make decisions in the safeguarding process in 2015/16.

For those individuals (162) identified as 'lacking capacity', 84% were effectively provided with support or were represented by an advocate, family member or friend. This figure compares with 84% in 2014/15 in Tower Hamlets and 61% in England.

The outcome of investigations

30% of safeguarding investigations could not be substantiated in 2015/16, as the alleged types of abuse were either unclear, unfounded or disproved. This is a decrease of nine percentage points on the previous year, but on par with the England average of 30%.

There was a decrease in the proportion of cases where no further action was taken, from 40% in 2013/14, to 33% in 2014/15. The 2015/16 totals, however, are currently being audited, and so are not as yet available.

3.8 User Experience

In our monitoring of user experience at the end of safeguarding investigations, 90% of adults at risk said they were satisfied with both the safeguarding process and their safeguarding outcome in 2015-16.

The table below shows data taken from the Service User Annual Survey:

7a	Which of the following statements best describes how safe you feel?	2011	2012	2013	2014	2015	2016
	I feel as safe as I want	58%	59.5%	57.9%	63.47%	59.8%	62.7%
	I feel adequately safe, but not as safe as I would like	32%	30.4%	31.3%	28.93%	31.5%	28.6%
	I feel less than adequately safe	7%	7.2%	7.2%	5.15%	5.7%	5.7%
	Don't feel safe at all	3%	3.0%	3.7%	2.44%	3.0%	3.1%
7b	Do care and support services help you in feeling safe?	2011	2012	2013	2014	2015	2016
	Yes		81.2%	84.6%	86.4%	87.1%	86%
	No		18.8%	15.4%	13.6%	12.9%	14%

The figures largely show consistency from year to year. For 2016, there has been a slight increase in the number of people who report that they feel “as safe as I want”, whilst the figures for those saying they feel less than adequately safe or not safe at all have remained largely unchanged. In 2016 there was a slight reduction in the number of service users who said that the services they received helped them to feel safe.

Section 4: Safeguarding Assurance from Member Organisations

4.1 London Borough of Tower Hamlets

4.1.1 Safeguarding of Adults and Promoting Their Welfare

LBTH remains the lead agency responsible for the oversight of all Safeguarding Adults alerts and enquiries under the terms of the Care Act 2014.

LBTH has developed a new set of local procedures for adult safeguarding in response to the Pan London procedures. This has been done in tandem with a review and redesign of the safeguarding recording forms on Framework-i. The new procedures and forms have been designed to promote person-centred and outcome-focused working and therefore support the Making Safeguarding Personal agenda.

The Council has created and appointed on an interim basis to a management grade post for safeguarding strategy and the SAB and its sub-groups. The directorate has provided the resources to ensure that the SAB has been able to produce its annual report and four year strategy and business plan.

Safeguarding is also integral to the social care Practice Framework which ensures reflective practice.

Safeguarding Month was held in November 2015, creating opportunities for learning across the Council including presentations to social care teams to promote knowledge about how the wider Council works to safeguard adults.

The Council actively engages in the Safer Communities Partnership which addresses the Prevent agenda.

A clear annual programme of training is developed and reviewed each year to ensure staff have the knowledge and skills required to undertake their roles in relation to adult safeguarding. In 2015/16, the following training was delivered to Council Staff:

- Safeguarding Adult Minute Taking – a total of **17** people attended over 2 sessions
- Safeguarding Adult Basic Awareness - a total of **28** people attended over 2 sessions
- Safeguarding Adult Investigators 2 day - a total of **30** people attended over 2 sessions
- Safeguarding Adult Investigators Refresher - a total of **11** people attended over 1 session
- Safeguarding Adult Managers - a total of **12** people attended over 1 session

This training has helped to ensure that changes relating to adult safeguarding associated with the Care Act have become embedded within the practice of frontline staff.

A range of new initiatives have been undertaken in the past year as detailed below:

The Ensuring Quality project is a six-borough east London project hosted by LBTH, which has put in place a quality framework for individuals using their Direct Payment to purchase services from non-commissioned providers (who are not therefore subject to contract management arrangements). The framework includes good practice guidance for providers on safeguarding as well as a number of easy to use tools individuals can use to assess the safety and quality of the services they are using.

As an extension of the above project the Council is working with local user-led organisations in east London to develop an app based e-learning package aimed at Personal Assistants, which includes a number of modules on safeguarding and the promotion of individuals' welfare.

Adult Services' new Quality Monitoring Team visit all users to seek their feedback on quality of services and they follow up on any issues with regard to safeguarding, as well as collecting a wealth of data to inform commissioning and monitoring activities. This will be further refined and rolled out in 2016.

In line with the Care Act Provider Failure Regime requirement for the CQC, Adult Services Commissioners have established a local response to this. Of primary concern is the possibility that a provider is at risk of a failure which has not been identified by the CQC. Primarily in relation to financial risks, Adult Services' approach has been developed to better analyse the risks of failure and identify any actions that need to be taken to ensure continuity of service to vulnerable people. Adult Services has adopted this local response twice in the last year and managed to avoid service disruption as a result.

It is important to learn from Safeguarding Adults Reviews and Adult Services has therefore put checks and balances in place to address the learning from the SARs. Further details are provided in Section 3.5 above.

Adult Services monitors and observes improvement when providers respond to and deliver on improvement plans that have been put in place.

4.1.2 Evaluating Effectiveness

Adult services has a dedicated Provider Service Managers team meeting (PSMT) on safeguarding, held on a monthly basis to review performance and practice issues, and active cases. Safeguarding alerts are monitored and reviewed at the meeting, together with tracking of the timescales for completing enquiries and DoLS activity in relation to Best Interests Assessments. Departmental performance is strong in this area due to the successful recruitment, retention and training of BIA Assessors. Safeguarding is also a standing agenda item on the fortnightly PSMT meeting agenda.

Safeguarding is monitored as part of the contract monitoring quarterly reporting process, where alerts are monitored together with details of actions taken, outcomes and lessons learnt. Notifications of alerts to the CQC are also monitored. Site visits are also conducted to check staff training profiles and to review provider policies and procedures. Activity relating to DoLS and Mental capacity assessments is also monitored.

An audit tool was designed and used for a case record audit in November 2015. The audit revealed examples of good practice in relation to making safeguarding personal and a follow-up audit will be conducted in June 2016 to evaluate the effectiveness of new local procedures and recording forms.

The department actively invites external reviews of performance such as the ADASS peer review as detailed above.

Adult Services' approach to commissioning is centred on the commissioning cycle: analyse, plan, deliver, and review. This drives a focus on learning from the strengths and weaknesses of existing contractual arrangements when planning to re-let contracts and utilising national evidence and evidence from other local authorities when considering 'what works'. The service specification for domiciliary care services that will underpin the upcoming retender of these services has, for example, been significantly informed by national evidence on providing high quality, safe care as well as good practice in other local authority areas.

There are clear expectations set out in contracts and service specifications regarding how providers will safeguard the individuals they are providing a service to. Once the contract is awarded, there is a mobilisation period where our Contract Monitoring Officer will agree the format for future monitoring: typically quarterly monitoring returns with an Annual visit/review. The QMR will include information on safeguarding incidents and may instigate a visit, announced or unannounced. The annual visit will include ensuring updated policies and procedures include safeguarding.

Operational teams are required to notify the Council's Contract Monitoring Officers (CMO's) of any safeguarding issues, any patterns are investigated by the CMOs. It is the duty of

CQC registered providers to inform the CQC of the situation. Following discussion at a senior level, an embargo may be placed, and the CQC will also be informed as will other Local Authorities through the ADASS network. In addition CMOs respond to inspection reports by CQC in relation to improvement notices, enforcement actions and general requirements for improvement to dovetail Adult Services' own monitoring and approaches.

4.1.3 Improvements in Safeguarding Arrangements

Training for social care staff has been updated to ensure compliance with the Care Act in relation to safeguarding.

Local SAR procedures have been refreshed with the update including the need to inform the CQC when a SAR is initiated, to secure their involvement when required.

Following a SAR in 2015/16 local procedures for the management of hospital discharges has been undertaken to improve practice. The "Failed Visits" procedure for service providers visiting service users has also been revised.

The Practice Framework for Social Workers has been successfully implemented and improves practice to empower service users through a strengths-based and assets-based practice.

Safeguarding recording forms used by social care staff have been redesigned to promote best practice in relation to Making Safeguarding Personal.

Social care staff have worked collaboratively with the Learning and Development Team to undertake a learning needs analysis. This has resulted in the provision of targeted training on safeguarding triggers and thresholds, the new requirements of the Care Act, application of the Mental Capacity Act and the application of the Signs of Safety tool to adult safeguarding. This training programme will be rolled out throughout 2016/17.

The strategic management post for adult safeguarding has increased capacity and ensures Safeguarding Adult Reviews are convened in a timely manner. The strategic manager has been undertaking quarterly visits to front line teams to provide briefings on the work of the SAB and safeguarding strategy in LBTH.

The development of the Quality Monitoring Team whose remit is to visit individuals in their home to establish user satisfaction enables another avenue for service users to raise concerns, minimise risks and to follow up on issues by triggering a non-scheduled review. The challenge here is to better co-ordinate this activity with wider monitoring so as to be more effective with providers. The development of an overarching Quality Monitoring Framework will help the Directorate make better use of the wealth of information and intelligence with providers so that the council can work with them on improvements more proactively

Adult Services' Commissioners reviewed the Notifiable Incidents Procedure in September 2015 to ensure that it was still fit for purpose and reflective of the broad range of needs of the client groups. This policy is appended to provider service specifications. The Commissioning Division plan to make better strategic use of this information in 2016 to

target monitoring and improvement activities, as well as informing the commissioning of new services to ensure they have appropriate safeguards.

Adult Services' Commissioners use embargoes on admissions to services where the quality is not of a sufficient standard. One example is where commissioning has worked with a provider in the last year to address concerns, and the CQC now consider the service to be 'outstanding'.

4.2 NHS Tower Hamlets Clinical Commissioning Group

4.2.1 Safeguarding of Adults and Promoting Their Welfare

The Care Act (2014) has now established safeguarding adults' responsibilities on a statutory footing for the CCG; in particular making CCG participation in the SAB statutory, and requiring the CCG amongst other agencies to share information to enable the SAB to perform its functions. We are also required to address new responsibilities for safeguarding adults from extremism with the introduction of the Prevent Duty in 2015. The CCG has been working closely with the Tower Hamlets Safeguarding Adults Board to deliver the system change required to deliver the Care Act and associated statutory guidance. In particular, following the publication of the revised London Procedures, the CCG has worked with partner agencies, to redefine the scope of safeguarding adults in line with the Care Act requirements, and to roll out to provider organisations. The CCG has also been working with partner agencies to develop and commission practice in line with the principles of Making Safeguarding Personal.

The CCG Safeguarding Adults Committee considered the revised NHS Safeguarding Accountability and Assurance Framework. NHS England then undertook a CCG Safeguarding Deep Dive in October 2015 to establish compliance. In the five key areas assessed the CCG were assured as good. The overall findings are highlighted below:

Safeguarding Deep Dive Review Components	Outcome
Governance /Systems/ Processes	Assured as Good
Workforce	Assured as Good
Capacity levels in CCG	Assured as Good
Assurance	Assured as Good

To further strengthen the CCG's approach to safeguarding, and in recognition of its statutory status, the CCG will be appointing a Designated Adults Safeguarding Manager in 2016-2017.

4.2.2 Evaluating Effectiveness

Tower Hamlets CCG has an identified a Governing Body lead and a Senior Management lead for safeguarding adults, MCA, and PREVENT. In addition the Safeguarding Adults Committee of the Governing Body retains oversight for the identification and effective mitigation of risk related to safeguarding. This Committee, which includes local authority and provider partners, formally reports into the Safeguarding Adults Board on NHS provider performance and has oversight of delivery improvement within NHS provider partners. The

terms of reference for the group explicitly include safeguarding adults, domestic violence, the Mental Capacity Act and Prevent.

The CCG Board retains regular visibility of identified risks and actions through the Assurance Framework. There are a number of systems to ensure quality is monitored and safeguarding alerts/concerns are identified and lessons put into practice:

- A locally developed Adults Safeguarding Procedure.
- Scrutiny and input into serious incident management and subsequent action planning. The CCG also contracts with the CSU Patient Safety Team to oversee safeguarding, with regular reporting to the Adults Safety Committee for oversight. (STEIS reports). Trends and themes of safeguarding enquiries are presented to CCGs through the Quarterly trend reports.
- The quality team conduct regular visits to services to determine the quality of services and assess patient experience. Patient safety and compliance with safeguarding requirements is a core aspect of these visits. In particular knowledge of safeguarding procedures is assessed. These have included focused visits to Care homes in the Borough with Local Authority leads.

4.2.3 Improvements in Safeguarding Arrangements

The CCG is highly proactive in its approach towards quality improvement in safeguarding adults, and the broader responsibilities of the CCG Safeguarding Adults Committee. For example, in 2015/16 the CCG has:

- Commissioned a three year pilot of the IRIS programme to improve the detection of domestic violence in primary care.
- Commissioned a project within East London NHS Foundation Trust to improve Mental Capacity Act practice, which has seen a significant improvement in MCA practice.
- Provided training on safeguarding adults, MCA and Prevent to over 70 GP's and other primary care professionals.
- Implemented a safeguarding (including PREVENT) adults' dashboard across east London to be inserted into provider contracts.
- Participated in the panel of 3 Domestic Homicide Reviews currently underway in the borough, and commissioned additional conduct disorder capacity to meet NICE guidance within ELFT as a partial response.
- Participated in the panels for two SAR's held during 2015-16
- Fully participated in the SAB processes including in the 2015/16 SAB audit process
- Overseen provider performance on MCA, safeguarding adults and Prevent, and reported the same to the SAB.
- Carried out a number of quality visits to provider services, which have included a focus on safeguarding where appropriate.

The CCG continues to work with colleagues in Serious Incident Panel for Waltham Forest, Tower Hamlets, Newham and City & Hackney CCGs as part of the Serious Incident Panel. The core purpose of the panel is to provide assurance that all serious incidents for which the CCG has either a lead or associate commissioning responsibility are being systematically reviewed and any concerns identified and escalated. The CCGs retain the responsibility for

provider Serious Incident (SI) monitoring in line with the Serious Incident Framework 2015/16.

4.3 Barts Health NHS Trust

4.3.1 Safeguarding of Adults and Promoting Their Welfare

The Trust has unique challenges in meeting the needs of very different and diverse communities. The Care Act 2014 has put safeguarding adults on a statutory footing, where robust governance arrangements and assurance are required for an expanded safeguarding adult agenda. The Cheshire West ruling on DoLS has also had a significant impact on the work of the trust. The recent CQC inspections at Barts identified that safeguarding adult arrangements are in place and are followed in most circumstances. Staff were assessed as being compassionate and respect patients' dignity. However, there were some areas that needed to be strengthened and the Trust undertook to:

- Ensure that there are robust systems in place to protect adults at risk in all clinical areas

and

- Embed the principles of the Mental Capacity Act in practice

Recruitment to temporary posts to support improvement work in safeguarding has been partially successful. The small safeguarding team undertake to attend safety huddles, visit wards and support the site safeguarding strategy meetings and investigations across the Trust. A model for an expanded safeguarding adults team has been developed in line with staff feedback from the external review and the operating models in other Trusts. The new model which incorporates a safeguarding advisor for each of the hospital sites requires approximately £300,000 investment and will be considered with other cost pressures as part of the budget setting exercise in March 2016.

4.3.2 Evaluating Effectiveness

Barts commissioned an external review of safeguarding arrangements throughout the Trust in July 2015. The report and recommendations formed the agenda of a summit where staff and partners worked together to agree the safeguarding model for Barts Health. An integrated strategy for safeguarding adults and children that will describe that model is in development and was circulated for consultation during March 2016. It outlines the assurance governance and leadership expectations for both safeguarding adults and children

A set of metrics have been developed and agreed with the local authority to monitor safeguarding activity. Each hospital Director of Nursing receives monthly reports on these metrics which include training compliance. The terms of reference for hospital-based

operational safeguarding meetings have been agreed to develop practice and improve assurance.

4.3.3 Improvements in Safeguarding Arrangements

Competency assessments were undertaken with Registered Nurses in inpatient areas in Trust hospitals which found some gaps in the knowledge of staff about the types of abuse that may happen in hospital and who responded to questions about safeguarding by deferring to either senior nurses or doctors who they expected to take responsibility and instruct them what to do. Some staff did not demonstrate knowledge and practice commensurate with statutory training. This gap has been challenged through safety huddles and Sisters' meetings, face-to-face training on the preceptorship and internationally trained nurse's programmes and a number of face-to-face, bespoke training sessions on site, such as the surgical nurses study days. However, it is clear that a robust competency-based training strategy is needed. Work with the Education Academy is being undertaken to inform a business plan that puts safeguarding adults training on the same footing as safeguarding children in line with the Care Act 2014. This will include face-to-face competency-based training for all registered health professionals at band 6 or above on induction and updated every 3 years; enhanced training for senior leaders and those who give advice to others about responding to safeguarding concerns and updated, enhanced content for level 2 training for all staff.

4.4 East London NHS Foundation Trust

4.4.1 Safeguarding of Adults and Promoting Their Welfare

East London NHS Trust provides inpatient and community services for people with mental health conditions. These service users are often vulnerable and at great risk of harm. Safeguarding issues are raised routinely, and addressed within the Care Programme Approach (CPA) process. For those service users who are not under CPA, Trust staff are trained to identify any safeguarding concerns via the Pan London procedures as implemented within Tower Hamlets.

4.4.2 Evaluating Effectiveness

All incidents raised through the Datix incident reporting system are subject to the Trust Assurance team to monitor effectiveness.

The Trust produces its own workplan for the year and reports back to the Trust Safeguarding committee to assure itself of the progress of these tasks.

A set of metrics have been developed and agreed with the Local Authority to monitor safeguarding activity. These result in the production of a performance dashboard which is reviewed at the CCG Commissioners Safeguarding Meeting on a bi-monthly basis.

4.4.3 Improvements in Safeguarding Arrangements

The wards have been successfully using Qi techniques to address high levels of aggression on the wards.

4.5 London Ambulance Service

4.5.1 Safeguarding of Adults and Promoting their Welfare

There has been a restructure within the organisation, and there is now a named lead for safeguarding for each area. The named person will now be attending the safeguarding boards, and is able to be involved in any safeguarding adult reviews as and when required.

Safeguarding training has been delivered to a high number of frontline crew staff, with case studies and the inclusion of PREVENT.

The Ambulance Service now have a portal which can provide information on the number of referrals by area, as well as the amount of feedback received from each area.

A safeguarding conference is held each year. The last conference was held on 22/03/2016 and was open to any staff in the organisation who wished to attend. The conference included an item in which patient stories and experiences were recounted.

4.5.2 Evaluating Effectiveness

An annual report is compiled, looking at the number of safeguarding referrals made, and the training received by staff. The newly designed portal will be able to make comparisons against previous years' data.

Feedback is given about training to help monitor relevance and effectiveness.

The level of feedback from external agencies regarding safeguarding referrals remains low, and therefore the appropriateness of some safeguarding referrals and the quality of them may not improve. It has been proven that LAS staff learn best from specific cases and feedback, so in order for learning to improve, feedback would be highly beneficial.

London Ambulance Service produces a London-wide annual report detailing its safeguarding measures during the year. A full report along with assurance documents can be found on the Trust's website. This is produced for inclusion in London SAB Annual Reports and is presented in Appendix 3.

4.5.3 Improvements in Safeguarding Arrangements

Increasing the number of safeguarding referrals made, given the mobile environment that our staff work in, has been a challenge. The LAS have therefore changed the way referrals are made to make it easier for staff to make referrals.

4.6 Metropolitan Police

4.6.1 Safeguarding of Adults and Promoting Their Welfare

The Metropolitan Police Service (MPS) has adopted the new Code of Ethics and officers are accountable to both the police and the public for their actions and performance.

All operational officers have received Vulnerable Adult Framework (VAF) training; this was delivered to several hundred officers at Professional Development Days. Bespoke Disability Hate Crime training has been delivered to all operational police officers and public access officers. The Community Safety Unit (CSU) has received comprehensive training on Hate Crime and Vulnerable Victims from a Crown Prosecution Service prosecutor. Training for new recruits has been completely redesigned in relation to missing people and other safeguarding issues; this training is delivered using a new HYDRA suite. The MPS is currently designing bespoke training courses for officers working in dedicated Missing Person Units and for other operational officers. Community Safety Officers have completed a bespoke 5-day CSU course at the MPS Crime Academy. Officers and staff within specialist safeguarding roles have also participated in workshops and further e-learning packages to meet their additional needs. Senior Leadership Team members and other officers have completed the Mental Health & Safeguarding Training which was facilitated by an independent training provider.

Safeguarding remains a critical priority for the police and needs to be balanced with other performance demands. Tower Hamlets borough conducted a review of resources and governance which led to the restructuring of the entire Criminal Investigation Department with additional assets being deployed in several portfolios such as the Community Safety Unit, Operation Jigsaw and the Missing Persons Unit.

A number of policies have been refreshed following various recommendations from Safeguarding Adult Reviews, Domestic Homicides and Serious Case Reviews as well as HMIC and other inspections. This national learning has been used to develop the Vulnerable Adults Framework as well as toolkits for missing people, domestic abuse and hate crime.

The police are an integral component of the borough's Multi Agency Safeguarding Hub, with the police being co-located with other partners in the Local Authority premises. The MASH is the single point of receipt for all safeguarding alerts; the team applies consistent thresholds for further action and advises the responsible agency on next steps if any further safeguarding processes are required. The MASH carries out any subsequent safeguarding assessments or reviews that are needed as part of whole service investigations and regularly attend case conferences and cross agency strategy planning meetings.

The borough's two most senior detectives are key members of the Local Safeguarding Adults Board.

4.6.2 Evaluating Effectiveness

The MPS policy introduces an enhanced and prioritised procedure for the safeguarding of adults at risk and creates a framework for all staff to provide an effective, professional and corporate level of service.

All police reports are subject to mandatory supervision within 24 hours: this includes our crime reporting system (CRIS) and other systems (MERLIN and CAD). On more serious and complex cases there will also be Detective Inspector and Detective Chief Inspector reviews completed at timely intervals.

The Police within the MASH review every Merlin report and provide direct constructive feedback to officers and line managers where appropriate.

Supervisors “dip sample” Merlin reports and crime reports to ensure quality of investigations.

Tower Hamlets borough run the “Rate your PC” initiative whereby victims are encouraged to give feedback on the attending officer’s performance.

The Public Attitude Survey is conducted within the MPS and results broken down by borough to inform our understanding of public confidence.

Every police call is monitored in terms of initial coding to final outcome ensuring where vulnerable adults are identified at the outset the relevant reports and appropriate actions are completed.

There are a number of performance reports created centrally by the MPS in order to understand and improve effectiveness, comparing boroughs with each being held to account and sharing best practice.

The MPS welcomes feedback from other agencies and seeks to learn and improve professional practice, striving for continuous improvement across the Safeguarding Adults arena.

4.6.3 Improvements in Safeguarding Arrangements

All Operational officers and police staff have access to MPS policy pages where specific documents on vulnerability and protection of adults at risk can be found. These include best practice guides; Vulnerability Assessment Framework for Adults at Risk flow chart; mental health and investigation toolkits and links to sites for further information on the Care Act and identifying risk.

Tower Hamlets Police treat the safeguarding of adults very seriously and have ensured that all staff are aware of their obligations within the Pan London Multi Agency Policy and Procedures to Safeguard Adults from Abuse and are therefore directly accountable for their own actions. Clear guidelines and training are provided with additional MERLIN training to record individual incidents. These are in turn researched and reviewed within MASH for compliance and accuracy and if required shared with partners.

All allegations of neglect or abuse will be robustly investigated. The MPS has specialist trained officers to deal with all areas of domestic abuse, gender abuse, adult and financial abuse along with extremist concerns where vulnerable adults are targeted and groomed.

Ongoing work between MASH and specialist units is being undertaken to adopt a cohesive strategy around the sharing of information where sensitivities and operational tasking is prevalent.

The borough ensures this is translated to delivery for safeguarding through intrusive supervision models and through the MPS ongoing continuous improvement process. The increase and quality in recording standards of reports involving adults at risk and families coming to the notice of police are visible representations of the increased level of training and supervision currently being provided to front line officers and supervisors.

4.7 National Probation Service

4.7.1 Safeguarding Adults and Promoting Their Welfare

The National Probation Service (NPS) is committed to reducing re-offending, preventing victims and protecting the public. The NPS engages in partnership working to safeguard adults with the aim of preventing abuse and harm to adults and preventing victims. The NPS acts to safeguard adults by engaging in several forms of partnership working including:

Safeguarding Adults is included in the NPS London Business Plan for 2015-16. There are a number of policy documents and processes, and some in development which reflect the organisation's commitment to safeguarding adults. These include: a NPS National Partnerships Framework for Safeguarding Adults Boards, June 2015. *Safeguarding Adults – A quick guide* has been issued to all staff which reminds them of their responsibilities regarding safeguarding adults.

NPS has adopted the Pan-London policies and procedures and ensures as a division that all staff are aware of their responsibilities. Locally in terms of applying the Adult Safeguarding Procedures, staff will know the contact details in the Local Authority for feedback on referrals. Indicative timescales have been communicated re concerns, enquiries, safeguarding plan and review, and closing the enquiry. The NPS is aware of the expected responses and timeframes as directed by the Pan-London policies and procedures.

NPS makes a number of referrals to the Safeguarding and Mental Capacity Team in Tower Hamlets, when Probation officers consider offenders under their supervision, or adults linked to them, may fall under the remit of The Care Act 2014. They are not always necessarily deemed to meet the specific criteria.

4.7.2 Evaluating Effectiveness

NPS currently undertakes monthly case audits which involve all grades of operational staff reviewing specifically picked cases for auditing. Each audit deals with a number of specific Her Majesty's Inspectorate (HMI) areas of review, and incorporates assessments of staff adhering to safeguarding practices. It is desirable, as noted, that Safeguarding Adult data will assist the Tower Hamlets Head of Service to identify specific cases to review over 2016-2017 to specifically target practice in relation to offenders who may meet the relevant criteria for referral, and to follow the pathway and interventions being applied.

4.7.3 Improvements in Safeguarding Arrangements

The NPS has introduced its Safeguarding Adults at Risk NPS Policy Statement (Jan 2016): The statement requires each division to identify a senior manager lead for safeguarding and promotes the duty to co-operate as a relevant partner under section 6 of the Care Act 2014. It also seeks to ensure all staff are aware of their responsibilities, such as how to raise concerns.

NPS has also introduced EQUIP which is a tool enabling staff to quickly refer to policies and procedures.

Relevant learning from safeguarding adults reviews and other multi-agency reviews is cascaded throughout the London Division and a positive learning environment exists in the organisation.

Middle managers/senior probation officers must ensure that staff are aware of their role and responsibilities in relation to adult safeguarding and are familiar with local policy and procedures, including how to make referrals where necessary. They are aware of and review adult safeguarding cases being managed by their teams.

The *Safeguarding Adults at Risk: Offenders in the Community with Care and Support Needs* NPS Practice guidance policy encourages staff to consider Safeguarding Adults at all stages of involvement with an offender.

4.8 London Fire Brigade

4.8.1 Safeguarding of Adults and Promoting Their Welfare

The London Fire Brigade (LFB) has a safeguarding adults at risk policy which includes a Serious Outstanding Risk (SOR) flowchart and Fire Risk/Welfare Concern flowchart.

LFB has commissioned a new training package to be delivered to all Brigade staff in 2016 to comply with both the Care Act and London multi-agency policy and procedures.

There is an organisational culture that all staff are aware of their personal responsibility to report concerns. This will be reaffirmed by the new training package

LFB have a hoarding policy which was reviewed in June 2015.

The following is taken from a Memorandum of Understanding (MOU) between LFB and pan London borough SABs.

The aim of this MOU is to enhance the relationship between LFEPA and the council around safeguarding to improve the lives of Vulnerable Persons within the borough by making appropriate safeguarding referrals when a concern is raised by the LFEPA in carrying out its fire safety functions.

The London Fire and Emergency Planning Authority (LFEPA) agrees to pay the council the sum of £1,000 (one thousand pounds) for the year 2015/16 within 28 days of receipt of a valid invoice.

The borough agrees to consider arranging and holding case conferences on particular cases when LFEPA representative requests following a fatal fire.

The borough agrees to make referrals of Vulnerable Persons to LFEPA to carry out Home Fire Safety Visits (HFSV).

The borough will ensure that before they make the referral to LFEPA that they have the prior written permission from the Vulnerable Person, or responsible person, to forward the vulnerable person's contact details to the LFEPA, and that they consent to LFEPA visiting the vulnerable person's home and carrying out the HFSV.

Once written permission has been received from the vulnerable person, or responsible person, the borough will notify the LFEPA of the vulnerable person's name, address including post code, if possible and contact number, via either the phone number or e mail address set out below.

Once LFEPA receive the referral from the London Borough, LFEPA will contact the vulnerable person, or responsible person to arrange a HFSV as soon as possible to reduce the risk of fire in their home.

4.8.2 Evaluating Effectiveness

The LFB have a Performance Evaluation Tool (PET) which is used to evaluate how effective it has been in achieving targets on a rolling twelve month and year-to-date basis.

Examples of performance data are provided below:

Home Fire safety visits carried out in Tower Hamlets 2014/15 = 3351

Home Fire safety visits carried out in Tower Hamlets 2015/16 = 3449

The Brigade will undertake an audit of safeguarding by MOPAC to establish best practice and identify any gaps. The local fire service will ensure that a process is put in place so that any learning is shared by the borough commander with the Brigade Safeguarding Lead, ensuring that the broader organisation engages with the partnership and its objectives.

There is also a programme to develop case studies of relevant safeguarding cases to share with lead staff.

4.8.3 Improvements in Safeguarding Arrangements

LFB has participated in the Tower Hamlets audit challenge.

Within LBTH we have a Tower Hamlets Community Improvement Partnership (THCIP) where LFB:

- Make resources available including a designated Arson Reduction Officer to reduce arson and the negative effect that arson has on vulnerable people within the community.
- Improve partnership working with the police and housing providers within the borough, the combined effect of which reduces anti-social behaviour, which in turn improves the lives of vulnerable people within our community.

4.9 Tower Hamlets Council for Voluntary Services

4.9.1 Safeguarding of Adults and Promoting Their Welfare

THCVS does not directly deliver services to vulnerable adults; however as the umbrella organisation for the voluntary and community sector in Tower Hamlets, THCVS provides advice, guidance, support, training and information to a large number of organisations in Tower Hamlets, both those who are members of THCVS and those who are not.

Accessing safeguarding training can be a serious challenge for voluntary organisations. In June 2015 THCVS ran an introduction to safeguarding course, attended by 9 individuals. The training covered details of what safeguarding is, and how organisations can develop their own safeguarding policies. THCVS no longer runs this training – it is now provided by the volunteer centre in the borough, and the organisation can refer people to that course as necessary.

In addition THCVS provides advice and guidance to organisations who work with vulnerable adults. This includes advice on developing safeguarding practices.

It is currently a requirement of membership of THCVS that organisations have a satisfactory safeguarding adults policy in place.

THCVS supports the borough's health and wellbeing forum, employing a health and wellbeing officer to support the forum and develop policy in this area. THCVS attend the forum meetings and steering group – helping to set the agenda for the forum. THCVS also administers the running of the forum. The Chair is the voluntary sector representative on the Health and Wellbeing Board. THCVS also send regular health and social care e-bulletins to around 900 recipients.

4.9.2 Evaluating Effectiveness

THCVS completed the Safeguarding Adults at Risk Audit Tool and then took part in a safeguarding adult board challenge and support event.

The self-assessment and peer challenge event highlighted 6 Amber ratings for THCVS safeguarding practice – these were related to updating our policies and procedures, our job descriptions and our induction process. The audit also showed there is a requirement for THCVS to better communicate with the community and voluntary sector about safeguarding and the work of the SAB.

THCVS training courses are all evaluated by the attendees. Feedback is positive and people report an increase in their knowledge.

The health and wellbeing forum is also regularly evaluated by the attendees.

2.9.3 Improvements in Safeguarding Arrangements

The self-assessment has highlighted areas of THCVS practice that the organisation wishes to improve relating to safeguarding arrangements – most notably around policies and procedures, inductions for staff and updating job descriptions.

When applying for membership of THCVS organisations are asked to provide us with a copy of their safeguarding policy and procedure. THCVS will then work with organisations to improve their policies as necessary.

4.10 Toynbee Hall

4.10.1 Safeguarding of Adults and Promoting Their Welfare

Toynbee Hall continued with its Dignify project reaching older people and those with mental health issues. A series of workshops were delivered at a variety of settings from mental health centres including Beside, a stroke support group, the Geoff Ashcroft centre, and residential schemes including Duncan Court & Coopers Court as well as using a quiz as part of Older People's Day celebration at Mile End Leisure Centre.

4.10.2 Evaluating Effectiveness

After the workshops, participants are asked to identify types of abuse, and signs and symptoms of abuse, and also where to go if you are concerned about abuse. Generally 80% are able to report this.

4.10.3 Improvements in Safeguarding Arrangements

TH used the audit as a way of challenging itself as an organisation, and TH is now refining plans to train all front line staff and volunteers in Prevent awareness alongside safeguarding awareness.

TH are raising Safeguarding as an agenda point in Advice and Community services team meetings, to allow staff to discuss issues where they require clarity or guidance.

4.11 Providence Row Housing Association

4.11.1 Safeguarding of Adults and Promoting Their Welfare

Providence Row Housing Association (PRHA) has continued with its membership of the SAB and participation in the Good Practice sub-group.

PRHA have ensured that all staff have received training about the changes to safeguarding of adults resulting from the Care Act. The Association have also continued to implement

person centred practice in all its services, following last year's training on Transforming Teams.

Providence Row has set up an internal good practice group to monitor safeguarding within the organisation, examine issues around safeguarding and advise the Senior Management Team and the organisation.

4.11.2 Evaluating Effectiveness

Governance of policy review is set out by the PRHA Board, and policy, including safeguarding of adults, are reviewed annually, in accordance with this requirement. Each service keeps records of all incidents involving safeguarding, which are reported to commissioners.

The Safeguarding Lead reviews all safeguarding data with the Monitoring Officer every quarter and then takes this for discussion and action by the safeguarding good practice group and all service managers.

For the first time this year, PRHA have included specific questions on safeguarding in its annual survey of all service users. Providence Row will analyse the responses to provide information about the effectiveness of services in safeguarding service users.

4.11.3 Improvements in Safeguarding Arrangements

Providence Row took part in the SAB self audit for 2015/16 and also participated in the subsequent challenge event. This provided an opportunity not only to assess PRHA's own actions and plans re: safeguarding but also the impact of other services on service users and efforts to improve multi-agency working.

Following re-tendering of Providence Row services in Tower Hamlets, the greatest challenge has been in meeting the standards required in service delivery in a climate of fewer and fewer resources. Providence Row services have met this challenge often by having to work "smarter" in service delivery.

4.12 Real

4.12.1 Safeguarding of Adults and Promoting Their Welfare

Real provide annual safeguarding training to staff, volunteers, trustees, Local Voices, the representative group and partner agency staff.

Real are committed to the SAB strategic plan to ensure the voices of people who may be affected by safeguarding issues are heard.

4.12.2 Evaluating Effectiveness

All safeguarding issues are collected centrally and reported to other agencies as part of the contract monitoring requirements. These then get discussed with statutory agencies at the quarterly monitoring meetings on Real. They are also discussed at relevant team meetings to enable ongoing learning and development with the staff.

Real recognise there is more work to do on evaluating the effectiveness of its safeguarding interventions. Real also want to have a wider impact through supporting client input in SAB activities.

4.12.3 Improvements in Safeguarding Arrangements

As the lead organisation in a consortium of nine providers Real have requested each partner attends Real's training or provides evidence of their own in-house training. All of these other organisations are local third sector organisations. Not all of them would have been doing this regularly, so the challenge promotes greater engagement. Real ask partners to report on incidents during site visits and report quarterly to Real as part of their monitoring.

Real's advocates challenge social workers and social service practice when supporting clients who are at risk of, or subject to, a safeguarding concern.

Appendix 1 – Full Membership of the Safeguarding Adults Board

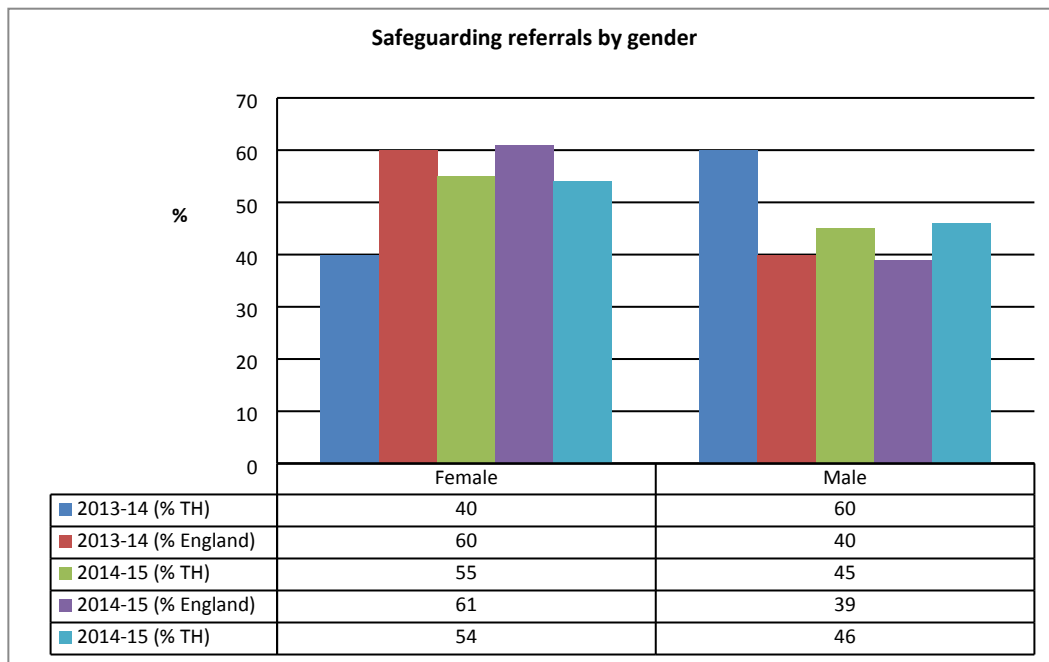
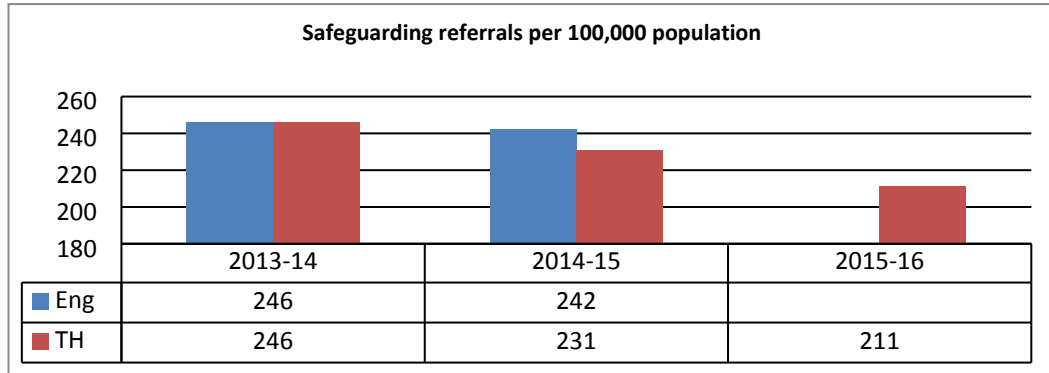
Organisation	Name	Designation
Independent Chair	Christabel Shawcross	SAB Independent Chair
LBTH		
Councillor	Amy Whitelock-Gibbs	Cabinet Member for Health And Adults Services
Corporate Director, Adult Services, LBTH	Denise Radley	Corporate Director, Adults Services
Policy, Programmes and Community Insight, LBTH	Layla Richards	Transformation/ Policy, Programmes and Community Insight Manager
Commissioning, LBTH	Karen Sugars	Service Head of Commissioning
Adult Social Care, LBTH	Luke Addams	Service Head Adult Social Care
Community Safety, LBTH	Shazia Ghani	Head of Community Safety
Children's Social Care, LBTH	Paul McGee	Service Manager Assessments & Early Intervention
Housing, LBTH	Janet Slater	Service manager Housing option.
Bart's Health	Jane Callaghan	Head of Safeguarding Adult
Bart's Health	Louise Crosby	Director of Nursing, St. Bartholomew's Hosp.

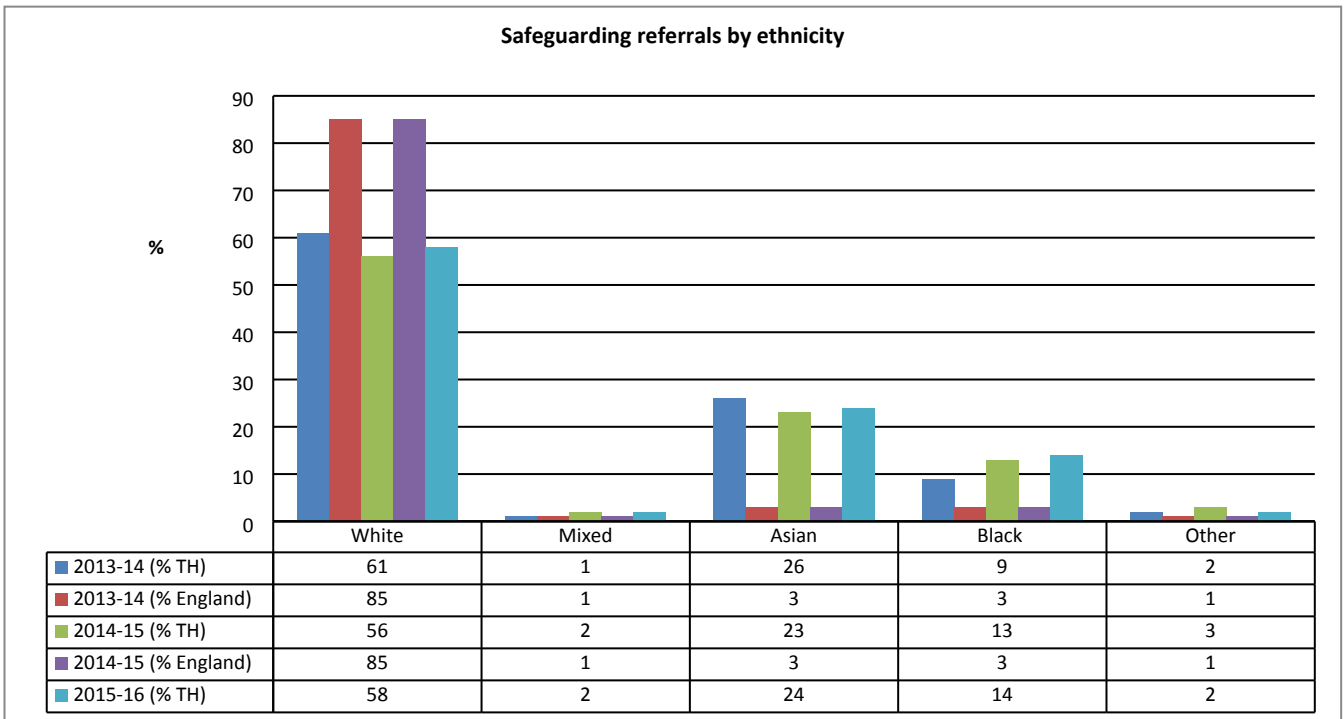
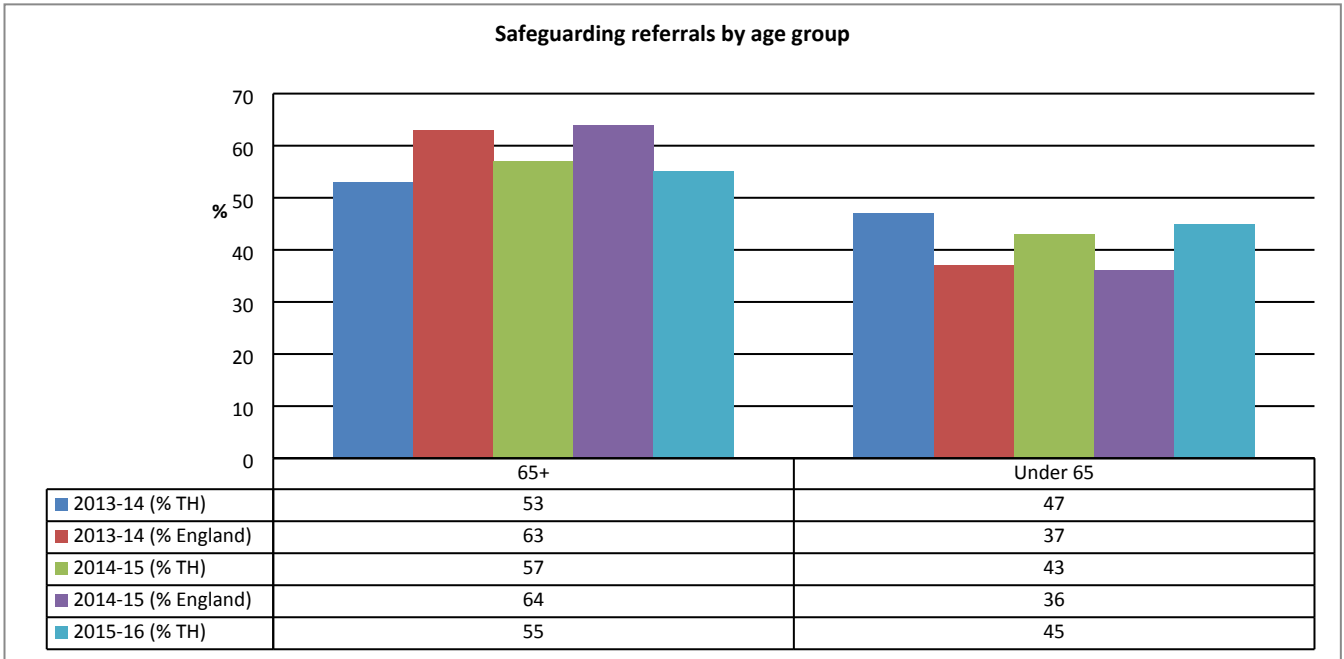
Organisation	Name	Designation
Bart's Health	Angela Robinson	Director of Nursing, St. Bartholomew's Hosp.
Bart's Health	Amanda Wood	Director of Nursing, Newham Hosp.
Bart's Health	Lucie Butler	Director of Nursing, Royal London Hosp.
Bart's Health	Felicia Kwaku	Director of Nursing, Whipps Cross Hosp.
East London Foundation Trust	Paul James Janet Boorman	Borough Director
CCG	Carrie Kilpatrick	Interim Deputy Director of Mental Health and Joint Commission
GP Care Group	Phillip Bennett- Richards	
Police	Sue Williams Ingrid Cruikshank	Chief Superintendent Detective Chief Inspector
Probation Service	Stuart Webber Suzanne Nidai	Acting Head of Hackney, City of London and Tower Hamlets National Probation Trust.
London Fire Service	Bruce Epsly Clifford Martin	Borough Commander

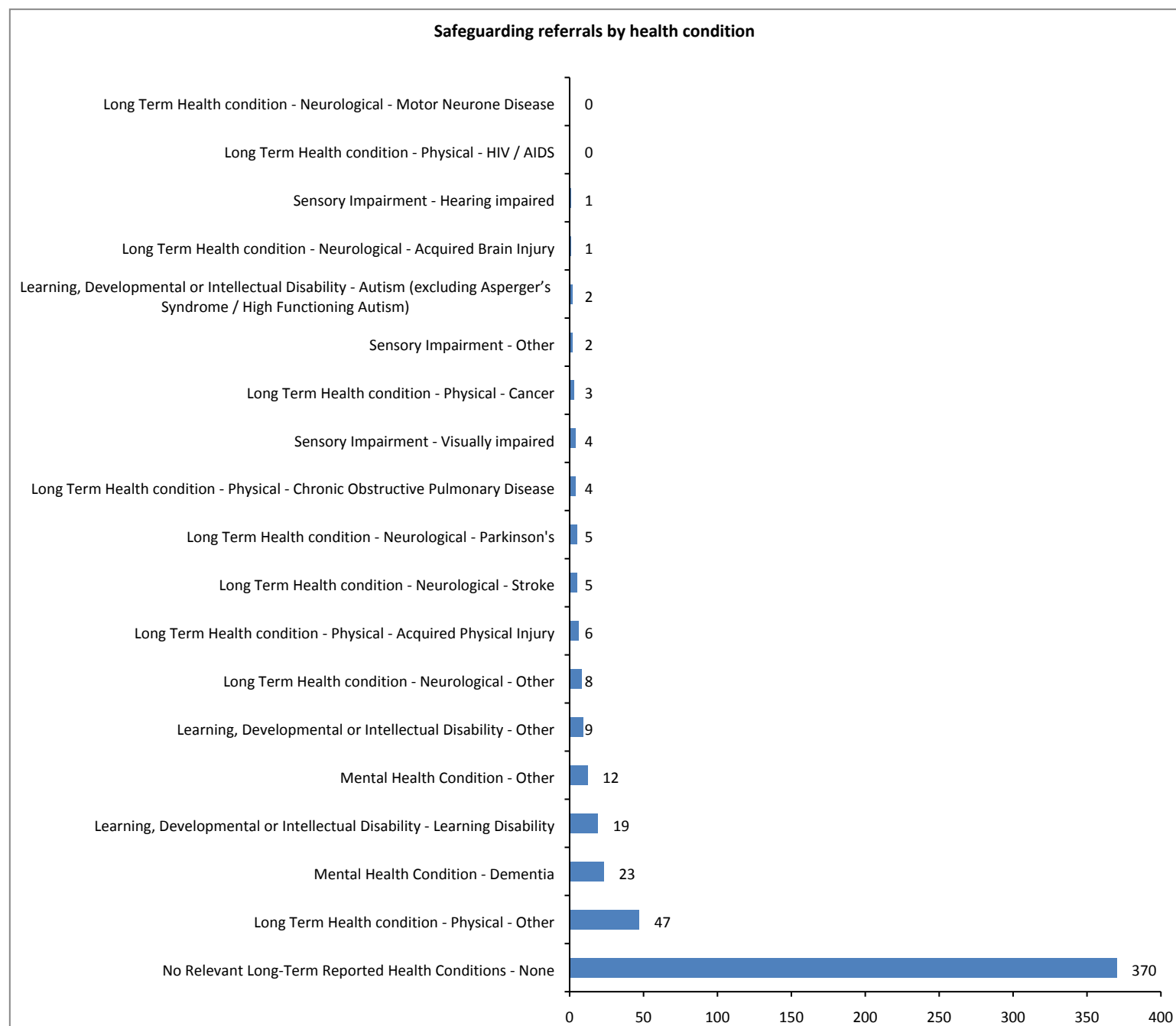
Organisation	Name	Designation
London Ambulance Service	Alan Taylor	Head of Safeguarding, LAS
	Alison Blakely	Quality, Governance and Assurance Manager, LAS
Providence Row Housing Association	John Wilson	Service Improvement Manager
Tower Hamlets Community Housing	Michael Tyrell	Chief Executive
Tower Hamlets Council for Voluntary Services	Kirsty Connell	Chief Executive
POhWER	Fiona Scaife	Independent Mental Health Advocate
Toynbee Hall	Dave Barnard	Head of community service.
	Kate Lovell	
Real	Mike Smith	Chief Executive
	Karen Linnane	Delivery and Development Manager
Health watch Tower Hamlets	Dianne Barham	Director
THCVS	Gemma Cossins	Development Manager
Age UK	Deborah Hayes	Director of Individual Services

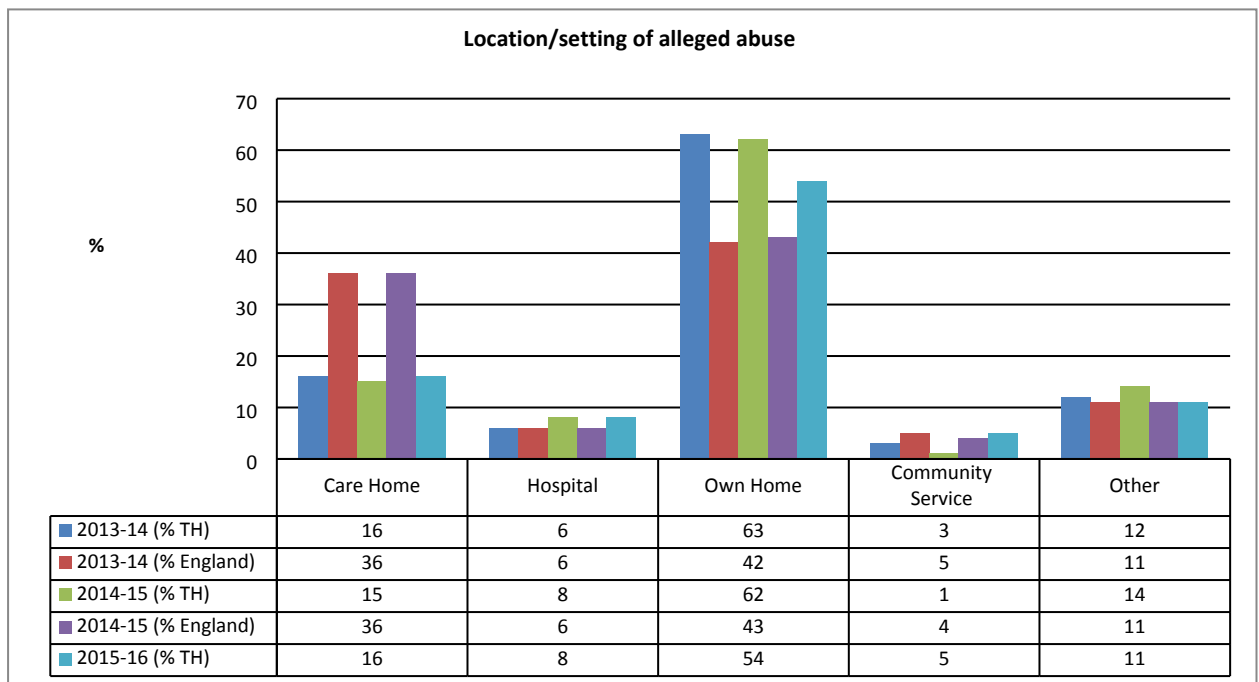
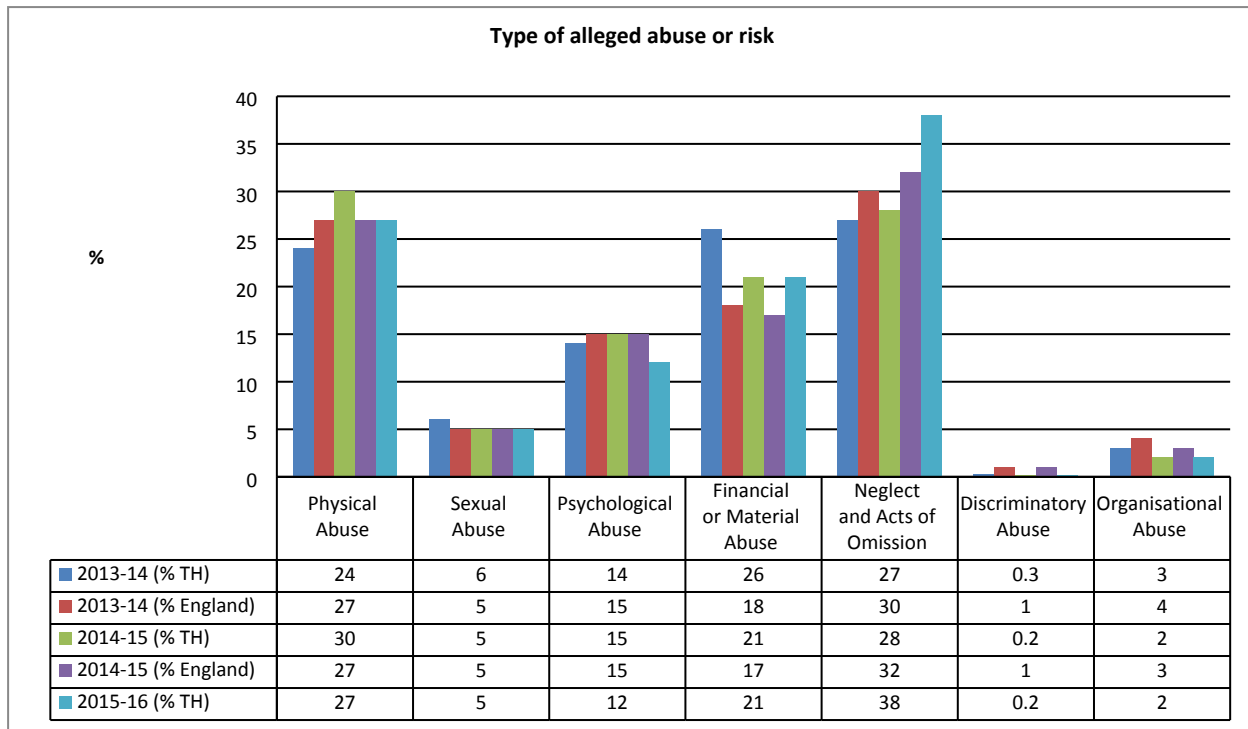
Appendix 2 - Data Charts

Referrals









Appendix 3 – London Ambulance Service Safeguarding Report 2016

The London Ambulance Service NHS Trust (LAS) has a duty to ensure the safeguarding of vulnerable persons remains a focal point within the organization and the Trust is committed to ensuring all persons within London are protected at all times.

This report provides evidence of the LAS commitment to effective safeguarding measures during 2015/16. A full report along with assurance documents can be found on the Trusts website.

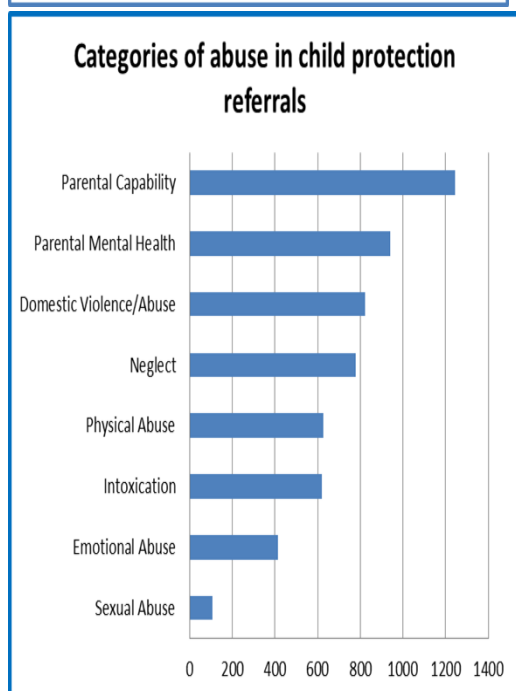
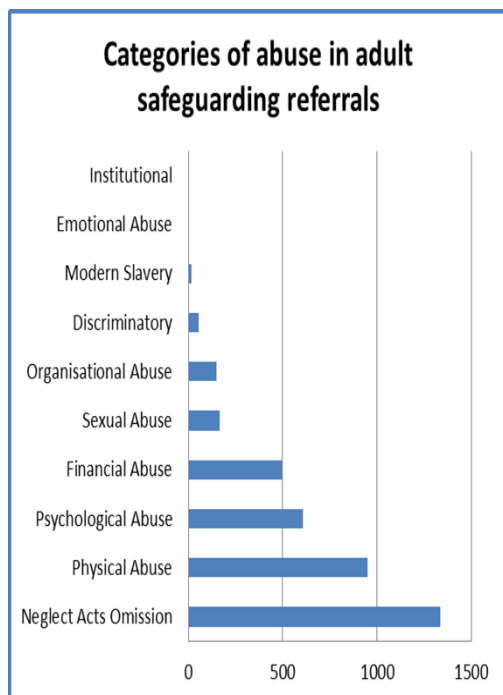
Referrals or concerns raised to local authority during 2015-16

The LAS made a total to 17332 referrals to local authorities in London during the year.

4561 children referrals, 4331 Adult Safeguarding Concerns, 8440 Adult welfare Concerns

	Adults Safeguarding	Adults Welfare	Children	Total Referrals	Referrals as % of incidents
LAS	4331	8440	4561	17332	1.66%
Barking and Dagenham	107	162	189	458	1.62%
Barnet	144	259	159	562	1.34%
Bexley	120	326	146	592	2.09%
Brent	157	258	138	553	1.40%
Bromley	153	317	153	623	1.73%
Camden	109	177	72	358	1.05%
Croydon	262	458	343	1063	2.26%
Ealing	174	319	183	676	1.70%
Enfield	132	267	217	616	1.62%
Greenwich	137	274	220	631	1.93%
Hackney	128	238	113	479	1.67%
Hammersmith and Fulham	89	176	63	328	1.48%
Haringey	123	238	134	495	1.59%
Harrow	80	136	92	308	1.28%
Havering	148	205	116	469	1.42%
Hillingdon	148	260	150	558	1.32%
Hounslow	165	330	152	647	1.98%
Islington	129	240	91	460	1.53%
Kensington and Chelsea	72	155	39	266	1.42%
Kingston upon Thames	75	152	69	296	1.63%
Lambeth	185	327	188	700	1.65%
Lewisham	149	348	194	691	2.07%
Merton	108	171	111	390	1.80%
Newham	143	232	182	557	1.38%
Redbridge	121	237	125	483	1.46%
Richmond upon Thames	90	203	62	355	1.92%
Southwark	191	313	166	670	1.62%
Sutton	128	223	108	459	2.00%
Tower Hamlets	111	194	141	446	1.35%
Waltham Forest	160	309	136	605	1.96%
Wandsworth	153	238	141	532	1.67%
Westminster	98	256	58	412	0.95%

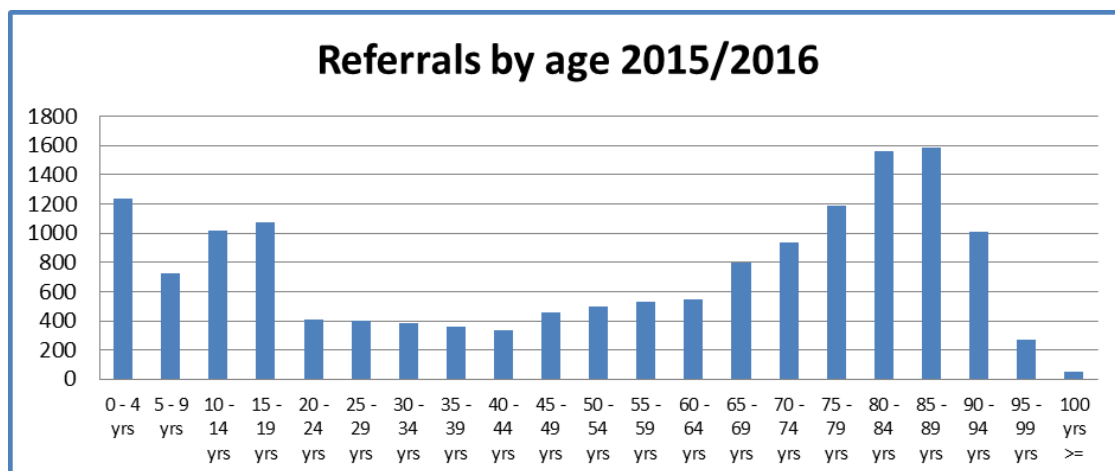
Categories of abuse



Referrals by age

Perhaps not surprisingly, the very young and the old are most likely to be the subject of referrals. For children, once out of infancy and their most vulnerable period they are most likely to be the subject of a referral once over 15. Around a third of referrals

for all children, according to an in-house audit conducted in Q1 of this year are related to self-harm. The majority of these are in the 15-18 age range.



Safeguarding Training

The Trust is committed to ensuring all staff are compliant with safeguarding training requirements. The chart below shows staff directly employed by the LAS as well as voluntary responders and private providers who we contract to work on our behalf.

Training required	Total Staff	Frequency of training	2014	Target to be trained 2015/16	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Total trained 2015/16	% of target 2015/16	3 year cumulative % of total staff trained	
Level One																				
Induction	various	on joining		various	28	10	14	9	0	14	19	19	17	53	0	26	209			
E Learning	1389	3 yearly	672	356	69	220	67	35	18	40	60	34	22	32	33	32	662	186%	96%	
Level Two																				
New Recruits	Various	on joining		various	Nil	53	88	31	39	124	13	16	47	27	74	177	689			
Core Skills Refresher	3019	annually		3019	N/A	N/A	N/A	N/A	310	596	785	936	N/A	178	N/A	N/A	2805	93%		
EOC Core Skills Refresher	443	annually		443	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	0%		
EOC new staff	Various	on joining		various	34	10	9	27	4	12	17	0	14	7	12	8	154			
PTS/NET	114	annually		114	Nil	N/A	20	N/A	25	29	N/A	N/A	N/A	N/A	N/A	N/A	74	65%		
Bank staff	390	annually	58	390		N/A	N/A	N/A	6	8	43	66	0	31	N/A	N/A	154	39%	54%	
111	152	annually	101	51	9	15	3	0	1	2	16	9	5	26	1	6	93	182%	128%	
Community first Responders (St John)	140	3 yearly	135	50	Nil	12	13	10	13	12	12	14	15	N/A	13	12	126	252%	186%	
Emergency responders	150	3 yearly		100	Nil	Nil	Nil	Nil	Nil	29	11	Nil	69	N/A	7	10	126	126%		
Level Three																				
EBS	30	3 yearly		25	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13	14	N/A	27	108%		
111	11	3 yearly	11	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0		100%	
Local leads	various	3 yearly		various	6	5	N/A	N/A	N/A	7	6	12	N/A	N/A	N/A	N/A	36			
Specific training																				
Prevent- clinical staff	3019	one off		3019	N/A	N/A	N/A	N/A	310	596	785	936	0	178	N/A	N/A	2805	93%		
Prevent- Non clinical	1389	one off		0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	0%		
Trust Board	17	3 yearly		17	N/A	N/A	12	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12	71%		
HR/ Ops managers	Various			various	29	N/A	N/A	N/A	N/A	7	N/A	N/A	N/A	N/A	N/A	N/A	36			
Private providers	450	3 yearly	226	112	26	21	13	10	19	16	14	11	6	18	21	13	188	168%	92%	
Other safeguarding	various	as required			104	12	N/A	N/A	N/A	N/A	N/A	N/A	12	0	0	0	75	203		
Nil = no figures provided																	8399	total		
N/A= no course planned this month																				

Emergency Operations Control (EOC) staff have safeguarding training planned for quarter 1 2016.

Patient Transport Staff (PTS) are also receiving safeguarding training in quarter 1-2 2016.

Bank staff position is currently under review by LAS Executive Leadership Team.

Trust Board training is arranged for May for those outstanding safeguarding training.

All non-clinical staff will undertake Prevent awareness in 2016.

The LAS full safeguarding report for 2015-16 can be accessed via the Trusts website.

Alan Taylor

Head of Safeguarding

Glossary of Abbreviations, Acronyms and Initialisms

ADASS – Association of Directors of Adult Social Services
ASB – Anti Social Behaviour
CAD – Computer Aided Dispatch
CCG – Clinical Commissioning Group
CMHT – Community Mental Health Team
CMO – Contract Monitoring Officer
CQC – Care Quality Commission
CPA – Care Programme Approach
CQUIN – Commission for Quality and Innovation
CRIS – Crime Reporting System
CSP - Community Safety Partnership
CSU – Community Safety Unit
CTR – Care and Treatment Review
DHP – Discretionary Housing Payment
DoLS – Deprivation of Liberty Safeguards
ELFT – East London NHS Foundation Trust
HFSV – Home Fire Safety Visit
HWBB – Health and Well Being Board
JSNA – Joint Strategic Needs Assessment
LAS – London Ambulance Service
LDPB – Learning Disability Partnership Board
LHA – Local Housing Allowance
LBTH – London Borough of Tower Hamlets
LFB – London Fire Brigade
LFEPA - London Fire and Emergency Planning Authority
LSCB – Local Safeguarding Children Board
MARAC – Multi Agency Risk Assessment Conference
MASH – Multi Agency Safeguarding Hub
MCA – Mental Capacity Act
MOU – Memorandum of Understanding
MPS – Metropolitan Police Service
MSP – Making Safeguarding Personal
NPS – National Probation Service
PET – Performance Evaluation Tool
PRHA – Providence Row Housing Association
PSMT – Provider Services Management Team
RSL – Registered Social Landlord
SAB – Safeguarding Adults Board
SAM – Safeguarding Adults Manager
SAR – Safeguarding Adults Review
SCP – Safer Communities Partnership
SOR- Serious Outstanding Risk
SPOC – Single Point of Contact
THCIP- Tower Hamlets Community Improvement Partnership
THCVS – Tower Hamlets Council for Voluntary Services
THIPP – Tower Hamlets Integrated Provider Partnership
VAF – Vulnerable Adult Framework

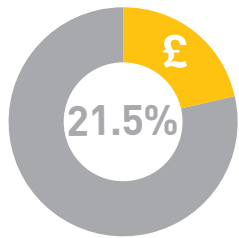
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KEEPING ADULTS SAFE IN TOWER HAMLETS 2015-16

The SAB is a multi-agency board that oversees safeguarding arrangements for adults in the borough.

POPULATION

284,000 We have one of the fastest growing populations in the country



50% of older people live below the poverty line

21.5% families have a household income less than £15k

SAFEGUARDING ENQUIRIES



Investigations conducted by adult social care teams to establish whether abuse has occurred

521 enquiries were concluded in 2015/16

54% of safeguarding issues occur in the adult's own home

16% safeguarding issues occurred in care homes.

The most common types of abuse investigated were

38% neglect

27% physical abuse

21% financial abuse

HEALTH



77.5 years – life expectancy for a man vs. 79.4 years national average



82.6 years – life expectancy for a woman vs. 83.1 years national average

Serious Mental illness is the fourth highest in London



SAFEGUARDING ADULTS BOARD (SAB)

6 key principles of safeguarding:

Empowerment

Prevention

Proportionality

Protection

Partnership

Accountability



91.3%

Research found that the majority of social care users felt safe

ACHIEVEMENTS IN 2015-16

We asked 12 organisations to assess their safeguarding performance. We found a good service was delivered. The Independent Chair also found new opportunities for us to improve the user experience during safeguarding enquiries.


A peer review by the Association of Directors of Adult Social Services (ADASS) found our Safeguarding practices were good and that we complied with new obligations set out in the Care Act 2014.

Deprivation of Liberty Safeguards: 885 people were referred for assessment. 613 applications to restrict liberty in the best interest of the adult were authorised. Independent Mental Capacity Assessors enlisted in 227 cases, ensuring that those who lacked capacity and had no next of kin to advocate on their behalf received the best care possible.

PRIORITIES FOR 2016-17

- Improve service user engagement and service user feedback mechanisms for adults involved in the safeguarding process.
- Improve access to safeguarding awareness training for voluntary sector staff.
- A continued focus on adults with learning disabilities being admitted to assessment and treatment units.
- Better partnership working in the collection and analysis of safeguarding data.
- A better understanding of referral patterns especially amongst groups of people, like BME groups, who are under represented in safeguarding referrals.

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Cabinet Decision 1 st November 2016	 TOWER HAMLETS
Report of: Corporate Director Development & Renewal	Classification: Unrestricted
Housing Strategy 2016 - 2021	

Lead Member	Councillor Rachel Blake Councillor Siraj Islam
Originating Officers	Martin Ling – Housing Strategy Manager
Wards affected	All
Community Plan Theme	One Tower Hamlets
Key Decision?	No

1. **EXECUTIVE 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 will need to have 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. It is anticipated that an exchange of letters will take place confirming the GLA is satisfied that the Strategy is "in general conformity with the Mayor of London's emerging housing policies,

given that the London Housing Strategy was adopted under the previous Mayor.” prior to it being submitted to full Council for adoption in November 2016.

- 1.4 The Housing Strategy will be taken to full Council for approval on November 16th 2016. This report sets out progress to date on producing the Housing Strategy, the outcomes of the consultation, and a suite of documents for approval which will then be presented to full Council for approval..

2. RECOMMENDATIONS

To approve the draft Housing Strategy and attached appendices for consideration by full Council on November 16th 2016.

2.1 REASONS FOR THE DECISIONS

To take forward the development of the Housing Strategy for approval by full Council.

2.2 ALTERNATIVE OPTIONS

The Mayor could decide not to take forward a Housing Strategy for approval by full Council but produce statutory documents and other stand alone housing policies.

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 and will be taken to Cabinet for approval. The allocations scheme will be considered by Cabinet on the 1st November 2016.

The Allocations scheme is also programmed to go to Cabinet on the 1st November 2016 and the proposals are summarised in section 5.1 of the second stage consultation document at Appendix 1.

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 Medium Term Housing Revenue Account (HRA) 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, will need to be 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 and next stages**

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 will be placed on the agenda for full Council for consideration and recommended for adoption on Wednesday 16th November 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.
- Exploring the merits of creating a Social Lettings Agency that can help offer more housing options for homeless people and others in housing need.
- 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 to the Mayor in Cabinet on the consultation that has been undertaken to date on the draft Housing Strategy for 2016 to 2021, and the Mayor in Cabinet is asked to approve the draft Housing Strategy and appendices for consideration by full Council on November 16th 2016.
- 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 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.
- 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 draft strategy to Full Council.

7.7 There is no statutory requirement to consult but the Council must consider whether a common law duty arises. 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 sets out 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 has been met. With regard to (d) above, before recommending the Housing Strategy to full Council, Cabinet must conscientiously take into account the consultation responses and, in particular, Cabinet must have regard to the Consultation Report at Appendix 4 as well as the evidence base at Appendix 5.

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**

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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.

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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.
- 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 tenants, the introduction of Pay to Stay higher rents for households earning a gross income of more than £40,000 is also a challenge.
- 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.
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- 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 though 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 was asked to agree 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.

- Consider amending the quota for Band 3 lets from 10% of one, two and three bed properties to 5% of 1 bed & studios per annum – because homelessness is increasing, meaning expensive temporary accommodation is having to be used. It is proposed to reduce the number of lets to Band 3 who are not in housing need thereby increasing the number of available homes to high priority cases.
- 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.

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, almshouses 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; the introduction of Pay to Stay for high income council tenants (meaning combined household incomes over £40,000 before tax) means that the need to continue providing advice to residents to help sustain their tenancies is likely to grow. 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. A full Equality impact Assessment will be carried out and presented to the Council for consideration when the document is taken forward for approval in November 2016

9.0 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 pay to stay proposals and 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

Delivery Theme 1 – More affordable housing, economic growth and regeneration
Action 1: Maximise affordable housing building from all sources of housing supply, with a focus on the borough's three opportunity areas
<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.
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>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.
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.
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.
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.
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

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.

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.
- 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 *Making Every Contact Count* approach.

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.

London Borough of Tower Hamlets

Draft 2016-21 Homelessness Strategy Outline

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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.

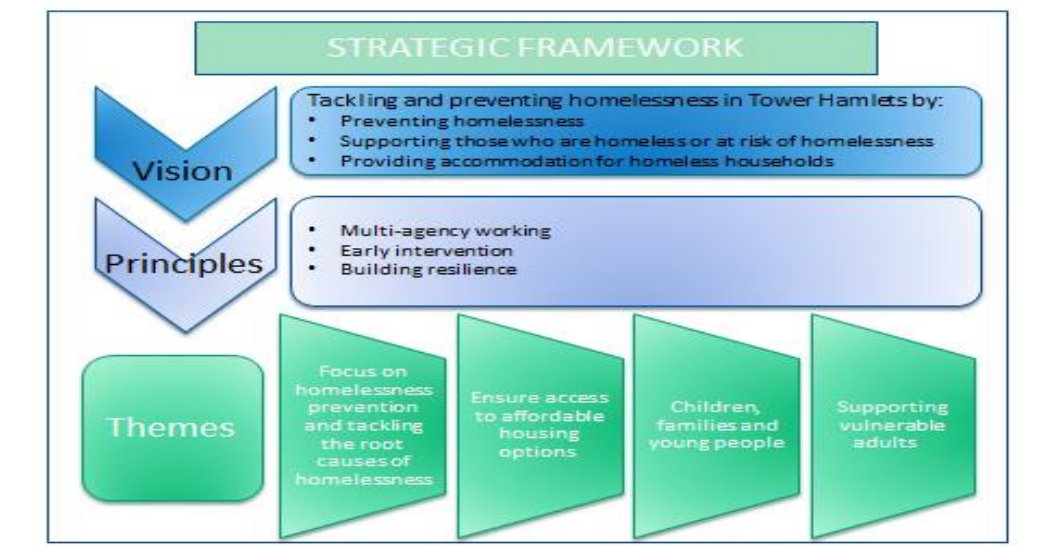
Increased property interventions – Means the council increasing and widening its portfolio of affordable temporary accommodation.

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

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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



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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:

<p>Although surely many nurses, social workers, care professionals earn under £30,000?</p>
<p>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.</p>
<p>Fire fighters, NHS workers not just nurses,</p>
<p>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'.</p>
<p>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.</p>
<p>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.</p>
<p>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.</p>
<p>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>

<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
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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 implements. 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

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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

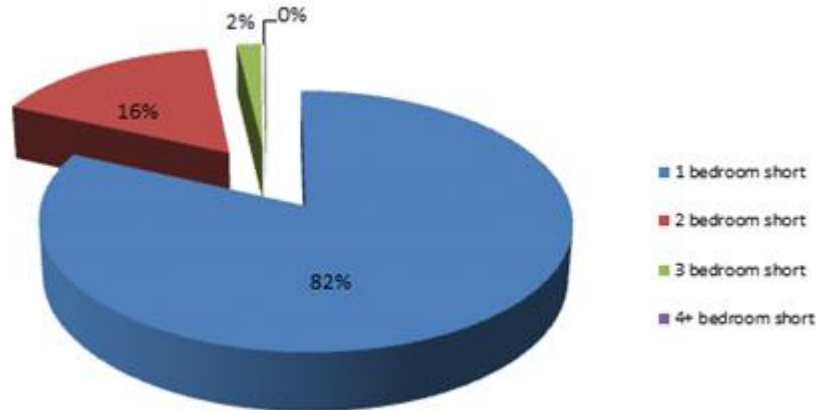
***Note: The drop in number of applicants on the CHR database was as a result of Council's review of the lettings scheme allowed for under the Localism Act in 2012 which meant a number of categories of applicants were no longer eligible to remain or join the Housing Register. [For more information on 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

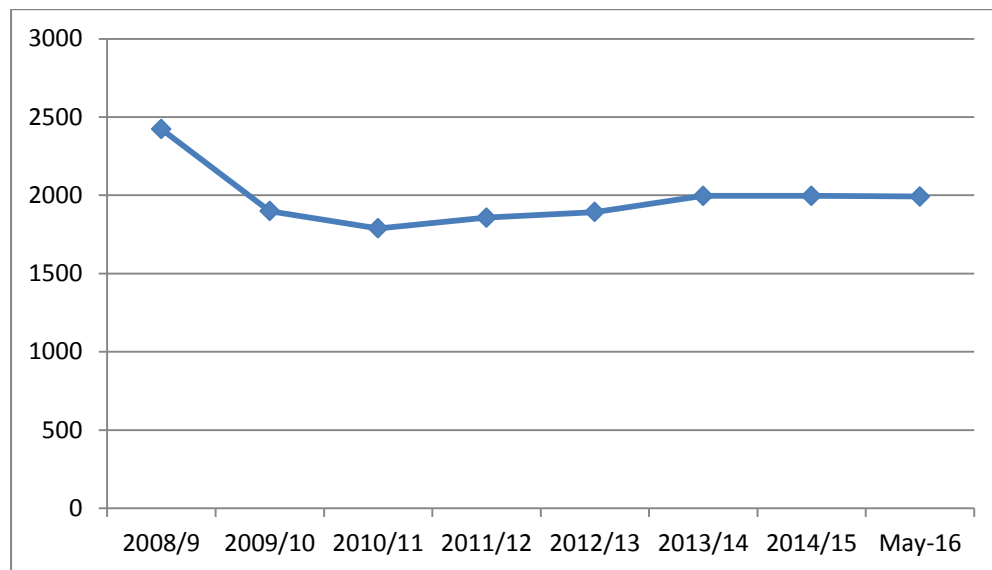
1.7 Housing the Homeless: Temporary Accommodation and Social Lets

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.

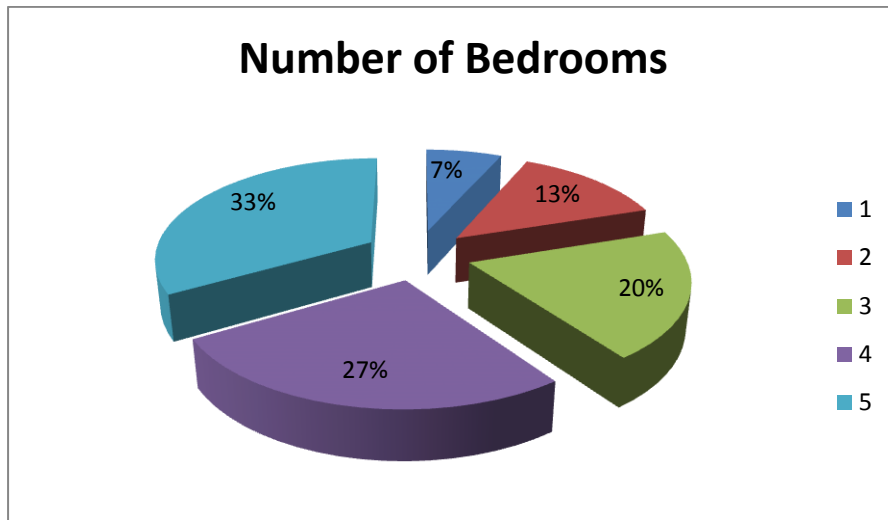
Since April 2015, a further 30 families have been rehoused in suitable properties.

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	

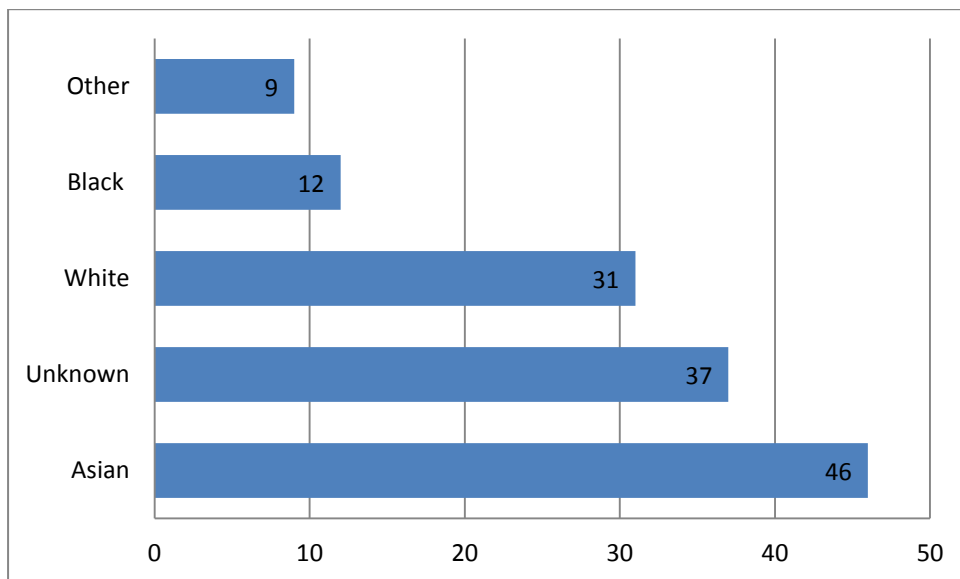
Source: CHR Forum Statistics, April 2016

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%

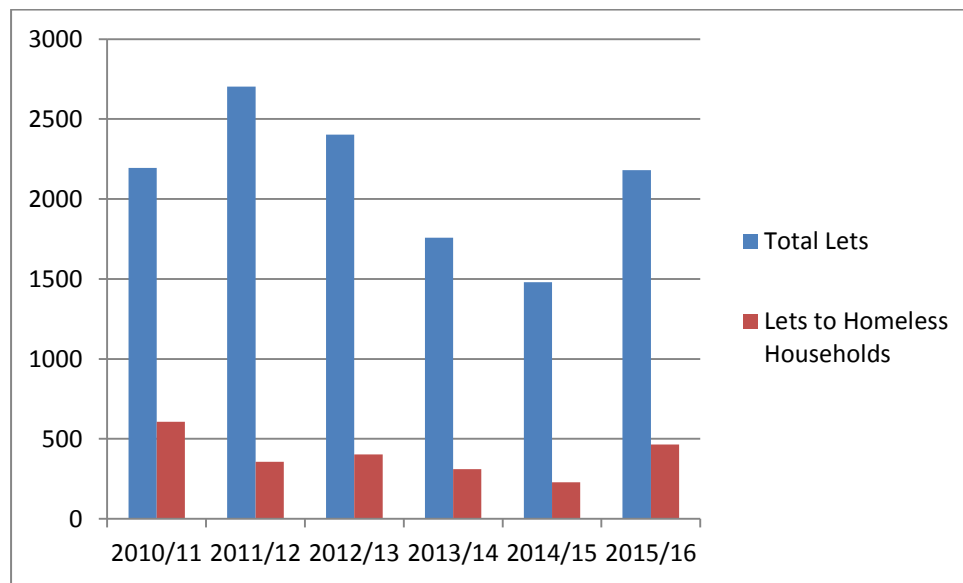
1B_PRIOSGL <i>Priority Single</i>	40	1.8%
1B_PRIOSOC <i>Priority social</i>	60	2.8%
1B_PRIOTRG <i>Priority target groups</i>	120	5.5%
2_OVERCRWD <i>Overcrowded applicants</i>	911	41.8%
2_PRIOHLSS <i>Priority homeless</i>	412	18.9%
3_CHRTRANS <i>Transfers</i>	31	1.5%
3_SHRADQHS <i>Applicants who are not 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

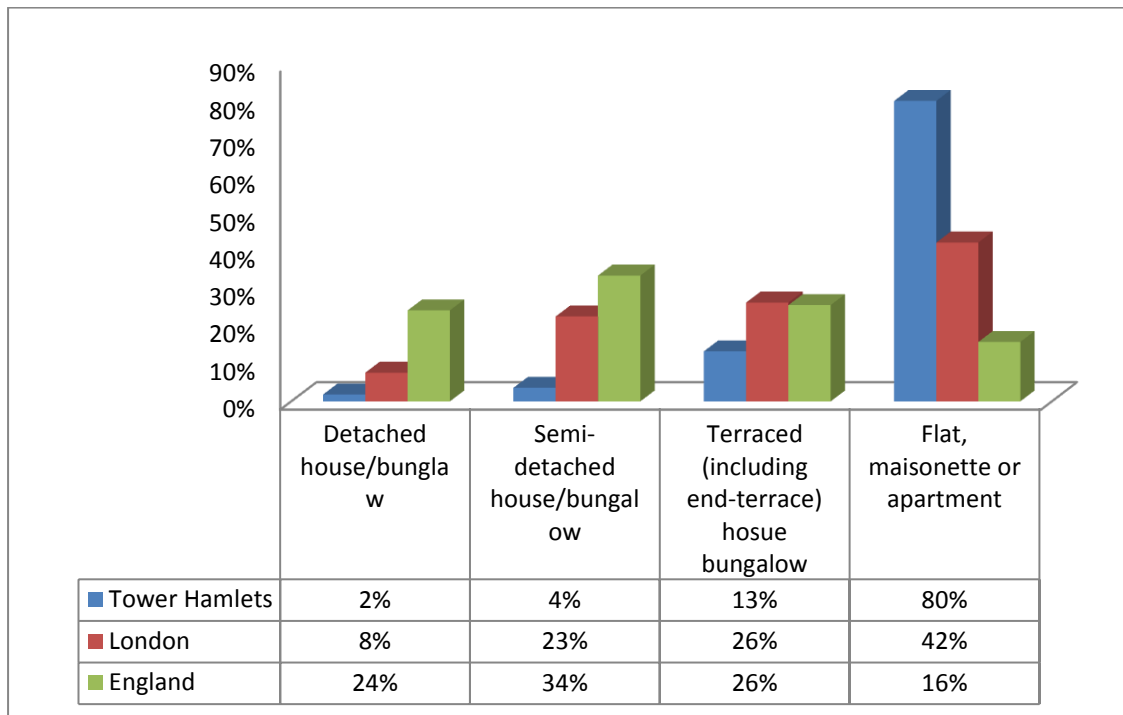
- Tower Hamlets has an annual housing target of 3,931 set up the Greater London authority and is expected to accommodate an additional 39,310 homes by 2021

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	

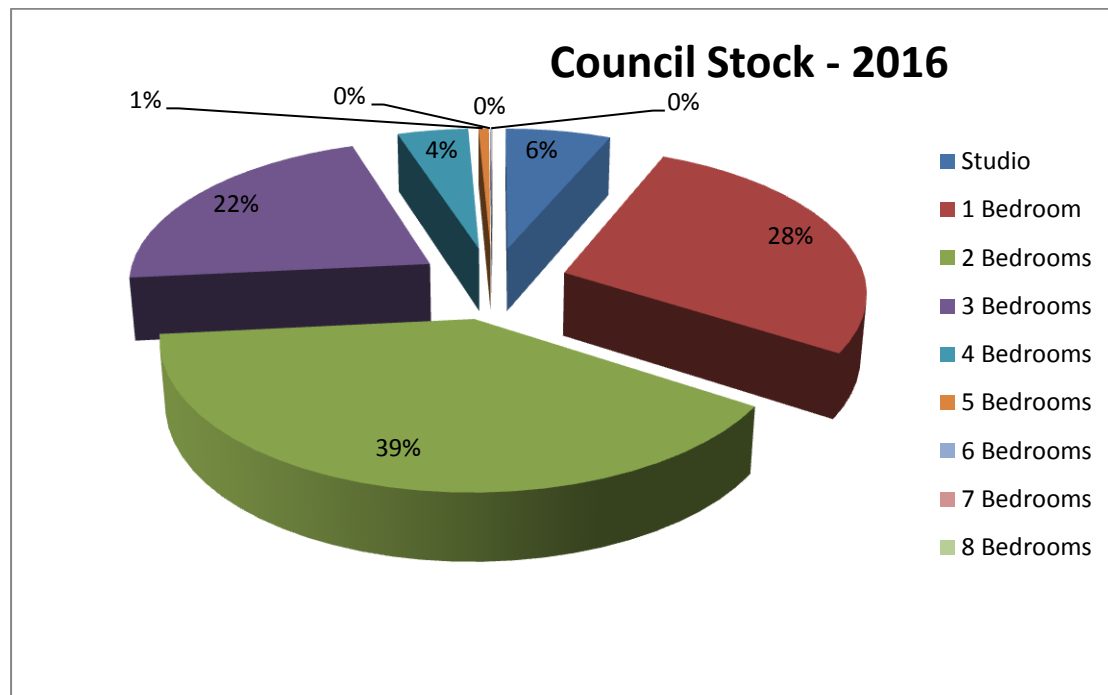
Source: LBTH Housing Affordability Commission, 2016

*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.

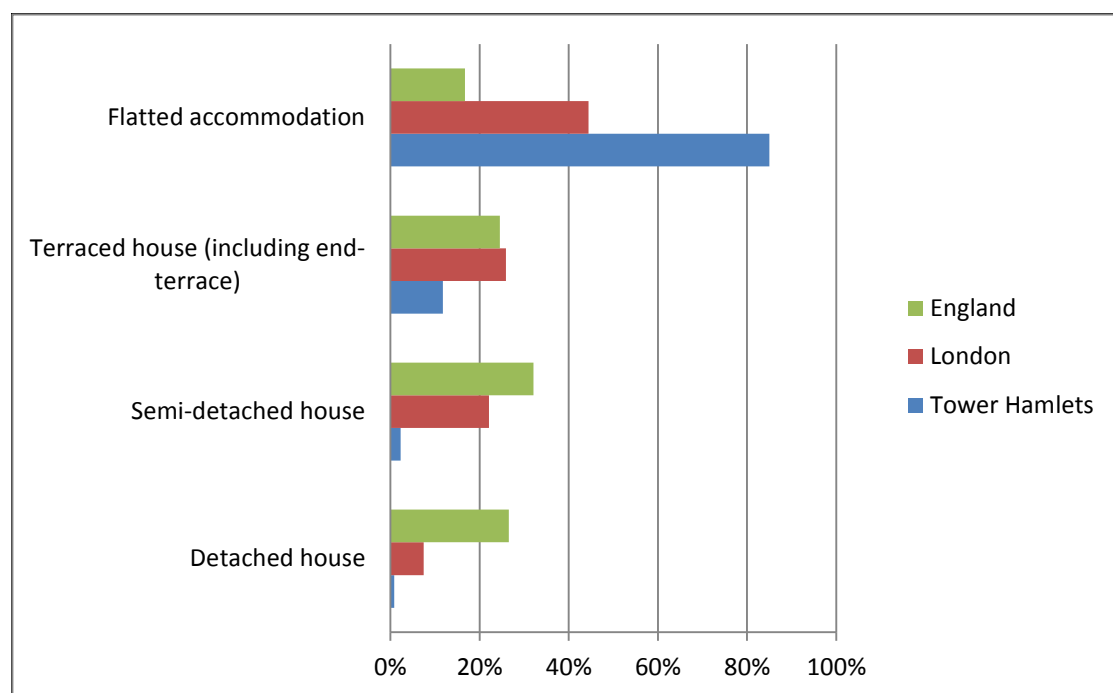
Reflecting the extent of residential development in the borough the survey also confirmed that around 37% of private sector housing has been built since 1990. This compares to 12.6% across the rest of the country.

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

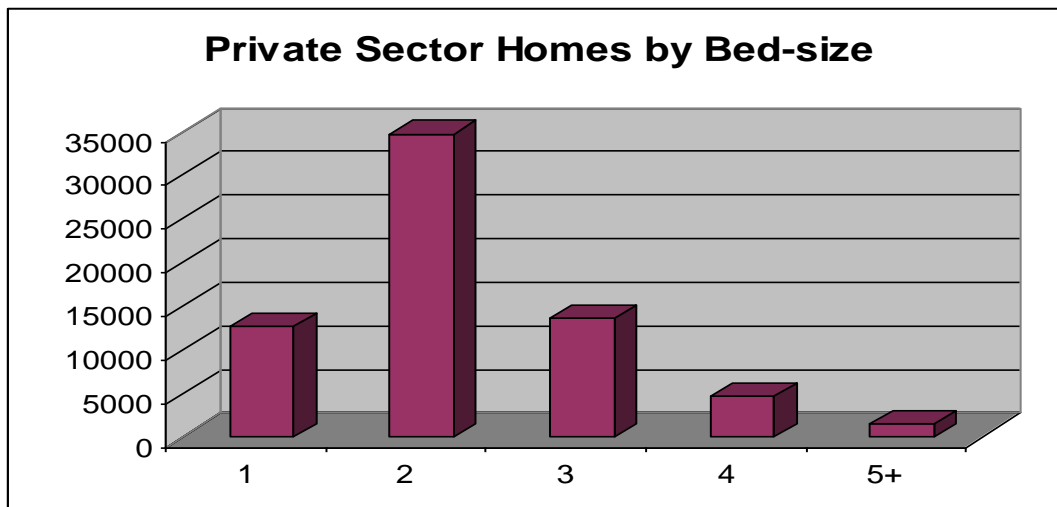
Diagram 8: Private Sector Homes by Property Type.



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 provided. 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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<p>Cabinet</p> <p>1 November 2016</p>	
<p>Report of: Aman Dalvi, Corporate Director of Development and Renewal</p>	<p>Classification: Unrestricted</p>
<p>Amendments to Housing Allocations Scheme</p>	

Lead Member	Councillor Sirajul Islam Cabinet Member for Housing Management & Performance
Originating Officer(s)	Mark Baigent, Interim Service Head Strategy, Regeneration, Sustainability & Housing Options
Wards affected	All Wards
Key Decision?	Yes
Community Plan Theme	A Great Place to Live

Executive Summary

This report for Cabinet recommends that the Allocations Scheme is amended in relation to the new Right to Move for employment reasons, introduced by government regulation. Members are asked to agree to the introduction of a new sub band to the Allocations Scheme following legal advice in relation to the 3 year residence requirement to be eligible to go on the Housing Register. Members are also asked to agree to amend the Allocations Scheme to place a restriction on applicants bidding for property smaller than their assessed need based upon the age/gender of children in order to avoid overcrowding.

The report further recommends a reduction in the quota for applicants not in housing need in Band 3 in order to direct more resources to higher priority applicants in housing need in Bands 1 & 2. Members are also asked to agree to give delegated authority to Director of Development and Renewal to set a target each year for a limited number of general needs properties to be used for temporary accommodation in the borough due to the procurement problems being experienced.

Members are asked to agree the Lettings Plan for 2016/17 and 2017/18 and to amend the criteria for key workers in the Allocations Scheme to include social workers.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the changes to the Allocations Scheme regarding the new Right to Move for employment reasons as required by changes in government regulations.

2. 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.
3. Agree to restrict existing policy that allows applicants to bid for 1 bed smaller than their assessed bedroom need and allow room sharing only where children of opposite sexes are both under 10 years old.
4. Agree 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.
5. 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.
6. Agree the Lettings Plan for 2016/17 and extend it to 2017/18.
7. Agree to add social worker to the professions that qualify for key workers status set out in the Allocations scheme.
8. Re-instate power to discharge the housing duty by making a Private Rental Sector Offer

1. REASONS FOR THE DECISIONS

- 1.1 Members are asked to agree to amendments in the Allocations Scheme in response to changes in government regulations requiring the local authority to comply and in relation to legal advice on the 3 year residence requirement to qualify to go onto the Housing Register.
- 1.2 Members are asked to agree to further amendments to the Allocations Scheme to respond to increasing homeless demand and the need for more affordable temporary accommodation in the borough.
- 1.3 The Lettings Plan has been updated for 2016/17 and 2017/18 and is set out in paragraph 3.80 of this report for decision by Cabinet. Members are also asked to amend the criteria for key workers in the Scheme to include social workers.

2. ALTERNATIVE OPTIONS

- 2.1 The Council is required to implement the new Right to Move in accordance with government regulation and no alternative has been identified.
- 2.2 The alternative to introducing a new sub band would be to assess each case on its individual merits. This would require administrative resources to carry out detailed casework on what could be a substantial number of new applicants.
- 2.3 The alternative is to continue with the existing policy that does not allow sharing a bedroom for children of different sex, regardless of age.
- 2.4 Alternative options are to maintain the existing quota of 10% of lettings up to 3 bedroom size property or reduce it to 5% of lettings up to 3 bedroom size.
- 2.5 Alternative options are to not agree to the proposal, or agree to a different annual target of properties for the purpose of temporary accommodation.
- 2.6 Members may wish to amend the targets in the Lettings Plan for any of the Priority Target Groups.
- 2.7 Members may decide not to include social workers in the professions that qualify for key worker status in the Allocations Scheme.

3. DETAILS OF REPORT

Right to Move

- 3.1 A new regulation came into effect on 20th April 2015 requiring local authorities to set aside 1% of lets to rehouse 'social tenants' who want to move for

employment reasons where the employment is more than one year and over 16 hours per week. Local authorities must give reasonable preference to those who qualify and publish lets against the 1% target.

- 3.2 The Council will have to comply with the new regulation and this can be done by creating a new Priority Target Group in Band 1B in the Allocation scheme. Feedback from the Residents Focus Group supported this new regulation. However, demand from 'existing social tenants' outside the borough seeking to move to Tower Hamlets for employment reasons is likely to be low.
- 3.3 The Housing Moves scheme operated by the London Mayor allows for moves for tenants in London. Any lets through the existing Housing Moves scheme can be included in the 1% target which would reduce the impact of the numbers rehoused under the new right to move regulation.

3 Year Residence Requirement

- 3.4 In 2013 following the Localism Act, the allocations scheme was amended to require 3 years continuous residence in the borough to be eligible to go onto the housing register unless exceptional reasons applied.
- 3.5 There is recent case law involving Ealing Council where their policy included a similar residential requirement that was challenged by a homeless applicant fleeing domestic violence who did not meet the criteria. The court found Ealing Council's policy to be unlawful because it failed to give reasonable preference to the applicant who was entitled to it under statute.
- 3.6 The Tower Hamlets allocations scheme is similarly vulnerable to legal challenge as it does not give reasonable preference to applicants in housing need in the borough if they do not meet the 3 year residence requirement. So far this issue has been managed by considering cases that have arisen on an exceptions basis where a request for a review by the applicant has been made.
- 3.7 However legal advice is that placing the onus on the applicant to raise the issue is potentially unlawful and the Council should assess each case for possible exceptional circumstances. This would require investigation and verification of the circumstances of each case. This would be a substantial administrative burden.
- 3.8 Removing the residency requirement would be unpopular amongst borough residents. An alternative would be to create a sub band in Band 2 (Band 2B) for applicants who are in housing need but do not meet the 3 year residence requirement.
- 3.9 This would give them reasonable preference by being given greater priority than applicants in Band 3 and would therefore be legally compliant. However they would have lower priority than other Band 2 applicants who meet the residence requirement.

- 3.10 Members are asked to agree to the introduction of a sub band in Band 2 designated Band 2B. This would resolve the risk of legal challenge to the present scheme whilst retaining the 3 year residential qualification period.
- 3.11 Should applicants placed in Band 2B subsequently meet the 3 year residential requirement they would qualify for Band 2 and be given a new preference date from when their circumstances changed in line with existing rules of the Allocations Scheme. This rule is to ensure that when an applicant moves to a higher priority band because of change of circumstances they would not have a higher preference date than applicants in the higher priority band before them.
- 3.12 The results of public consultation on this proposal are mixed. 60% of respondents consider the 3 year residence requirement is about the right length. However support for the proposed new sub band is relatively low with 32% supporting it, 44.5% not supporting it. This may be due to the limitations of the question asked which did not explain that the proposal is intended to reduce the risk of legal challenges to the policy and that the more costly alternative would be to commit staff resources to assessing the individual circumstances of each case that might arise.

Residential qualification and temporary moves out of borough

- 3.13 Members have raised concerns about individual cases where an applicant may move out of the borough for a limited period for good reason but in doing so may be considered to no longer meet the 3 year residence qualification or lose time in the borough towards meeting it. There are different scenarios where this issue may arise.
- 3.14 Members are asked to agree that where an applicant has been accepted onto the housing register but moves out of the borough for a short period for exceptional reasons, for example domestic violence, the time spent out of borough should not automatically count against them. Each case will be considered on its own merits.
- 3.15 Where an applicant applies as homeless and the Council accepted it had a statutory duty to assist them, then the local connection rules in Part VII of the 1996 Housing Act would apply. In relation to residence, a local connection is defined as 6 out of the last 12 months or 3 years out of the last 5.
- 3.16 Where a housing applicant does not meet the 3 year residential criteria but is in housing need they would be placed in the proposed new sub band in Band 2 should Members agree to this proposal.

Bidding for smaller property than assessed need

- 3.17 In 2013 in response to welfare reforms, the allocations scheme was amended to allow applicants to bid for 1 bed smaller (1 bed space only) than their household requirement. In 2015 /16, 216 applicants were rehoused on this basis.

- 3.18 Common Housing Register partners have raised concerns that some families not affected by the welfare reform changes were rehoused in this way causing unacceptable overcrowding, e.g. a single mother and teenage daughter rehoused in a 1 bed property.
- 3.19 The partner's reluctance to overcrowd conflicts with a demand from applicants to be able to choose a smaller size property than their household need in order to resolve their housing problem. Continuing this policy will assist managing homeless demand and help maintain control over temporary accommodation numbers and costs. The numbers rehoused in 2015/16 demonstrate that there is a demand from applicants to be able to exercise this choice.
- 3.20 CHR partners have been consulted and in response to their concerns Members are asked to agree that the provision to be able to bid for 1 bed less than assessed need is retained but subject to an age restriction that room sharing would only be accepted where there are children of the opposite sex if they are under 10 years old.
- 3.21 The majority of responses from the public consultation supported this proposal. 49.1% agreed with it, 34.8% did not.

Homeless Demand and the Allocations Scheme

- 3.22 The pre 2010 Allocations Scheme contained an incentive to apply as homeless because homeless households were placed in a higher priority band than overcrowded housing register and transfer cases. As a consequence homeless applications and demand for temporary accommodation was high.
- 3.23 When the Scheme was reviewed in 2010, a core objective was to try and reduce homeless applications. The revised Allocations Scheme implemented in 2010, placed homeless, housing register and transfer cases in the same band (Band 2) where preference was given in date order of registration. This produced a simple date order queue that was transparent, easy to understand and administer.
- 3.24 Under the new scheme, if an existing overcrowded Housing Register applicant made a homeless application they were given a new preference date (the date they applied as homeless). This meant they lost their previous waiting time on the register as a housing applicant.
- 3.25 The objective was to reduce homeless demand by giving an incentive to housing register applicants living in insecure accommodation to remain with friends or family if possible. Prior to 2010 by far the largest group of homeless applications came from such applicants.
- 3.26 A reduction in homeless demand meant that more housing supply would be available for housing register applicants and demand for and cost of

temporary accommodation could be reduced. The objective was to create a genuine alternative to making a homeless application for those who could remain with friends or family, by providing a better route to rehousing than if they applied as homeless. However, those that chose to do so would remain overcrowded while they were waiting on the list.

- 3.27 Changing the preference date from the original housing application to the date of registering a homeless application meant loss of any previous waiting time in the date order queue. On the other hand any disadvantage was offset by the fact they would be given suitable temporary accommodation pending permanent rehousing.
- 3.28 In 2010/11 the new Allocations Scheme exceeded expectations. The incentive not to apply as homeless clearly influenced the choices made by many housing applicants. In the first year of implementation, homeless acceptances fell by 36% from 838 to 537 and fell again to just over 400 in the following two years.

Table 1 – Showing reduction in homeless acceptances from 2010.

Year	09/10	10/11	11/12	12/13	13/14	14/15	15/16
Homeless acceptances	838	537	404	406	557	558	522

- 3.29 In 2010 the number of lettings to the homeless (943) were approximately the same as housing register applicants (994). After the introduction of the new Allocations Scheme, there was a substantial fall in lettings to the homeless and lettings to housing register applicants increased accordingly. (Table 2)

Table 2 All lets by category since 09/10

Year	09/10	10/11	11/12	12/13	13/14	14/15	15/16
Homeless	943	606	358	408	336	277	466
Hsg Reg	994	1,025	1,408	1,194	882	922	1,025
Transfers	746	621	937	833	689	674	690

- 3.30 **Rise in Homeless demand** – However, homeless acceptances rose from 406 in 2012/13 to 557 in 2013/14, a 37% rise. Acceptances remained at this higher level in 2014/15 (558) and 2015/16 (522). (Table 1)
- 3.31 The reason for the increase in homeless acceptances from 2013/14 is mainly due to private rented sector changes such as rising rent levels, increased competition and a rise in homeless applications due to loss of a private sector tenancy. It has also become more difficult for the Housing Service to procure private rented sector options to prevent homelessness.

- 3.32 However, the number of homeless applications from households living in insecure accommodation with friends or family remains relatively low. This indicates that the original objectives of the Allocations Scheme implemented in 2010 are being maintained.
- 3.33 Any loss of confidence in their rehousing chances on the part of this large group of applicants could generate an increase in homeless applications from them. This combined with increased homeless demand because of the deteriorating position in the private rented sector could push the level of homeless acceptances well above the present trend of over 500 a year.
- 3.34 **Temporary Accommodation** – Over the last four years there has been increasing difficulty in sourcing suitable temporary accommodation due to rising rents in the private sector and greater competition for resources. One consequence was a substantial rise in B & B usage with a large number exceeding the six-week legal limit during 2015/16.
- 3.35 At present 90% of private rented sector procurement for temporary accommodation is out of Borough. There has also been an increase in use of expensive B & B (costing the Council an average of £11,000 per placement pa) and nightly paid private sector accommodation (£6,500 pa) due to reduced supply of lower cost private leased accommodation.
- 3.36 Nightly paid accommodation currently comprises 31% of all self-contained private rented sector temporary accommodation used, compared with 24% in May 2015.

Tackling increased homeless demand and limited supply of temporary accommodation

- 3.37 New Homeless lettings quota - in March 2015 Members agreed to give delegated authority to the Corporate Director (D & R) to set a quota for homeless lettings to increase the number being rehoused in order to release units of temporary accommodation and bring the length of stay in B & B back within legal limits.
- 3.38 A quota was applied in 2015/16 resulting in 466 lettings to the homeless, a 68% increase on the 277 lettings in 2014/15. This helped bring the B & B numbers back under control and towards legal compliance.
- 3.39 Although the increased number of homeless lettings in 2015/16 made an impact on the problem, the higher level of homeless acceptances and difficulties in procuring suitable temporary accommodation are likely to continue. In these circumstances it will be necessary to maintain the same homeless quota during 2016/17.
- 3.40 With a finite supply of property each year the increase in lettings to homeless households through use of the quota reduces the lettings available to overcrowded Housing Register applicants in Band 2 although at present they

remain significantly higher than the proportion of lets to the homeless even with use of the quota.

- 3.41 However, it will be important to monitor the situation carefully to avoid any loss of confidence in their rehousing prospects on the part of overcrowded housing register applicants living with friends or family. The Allocations scheme has successfully held down homeless applications from this group since 2010. Giving a new preference date (thus losing previously accrued waiting time) to homeless applicants previously is a main factor in achieving this. The other important factor is that by doing so, rehousing prospects are much better for overcrowded households than should they apply as homeless. Maintaining the high level of lettings to this group is of course dependent upon maintaining a relatively lower number of homeless acceptances.

Proposed reduction in Band 3 Quota

- 3.42 Applicants not in housing need are placed in Band 3 of the Allocation Scheme. From 2010 a quota of 5% of lettings was earmarked for these applicants. This was to provide an opportunity for rehousing for private sector tenants who wanted to move to more secure accommodation and to offer some 'like-for-like' transfers for tenants of Common Housing Register partner landlords.
- 3.43 Members decided to increase the quota from 5% to 10% for 2014/15 in order to make up for the previous year's underperformance. This resulted in 163 lettings for Band 3 applicants compared with 277 homeless households in 2014/15.
- 3.44 In the March 2015 Cabinet report, members were asked to agree a return to a 5% quota for Band 3 applicants for 2015/16. However members decided to retain the 10% quota. This resulted in 194 lettings to Band 3 applicants in 2015/16 consisting of 38 two and three bed properties and 156 one bed & studios.
- 3.45 This relatively high number of lettings to applicants not in housing need took place during a period when the number of homeless acceptances had risen significantly. The costs to the Council of accommodating homeless households have risen exponentially because temporary accommodation housing benefit subsidy has been frozen since 2011. Housing Benefit subsidy shortfall and discretionary housing payments to benefit-capped households in temporary accommodation has cost the Council between £5.5million and £7.5million PA in the last three years. Given the pressures of higher levels of homeless demand and difficulties in securing suitable temporary accommodation Members are asked to agree to reduce the quota to 5% of 1 bed & studio properties per annum only.
- 3.46 In the public consultation, 84% of respondents agreed it was either very important or important to give priority for housing to those in housing need. However in relation to the proposal to reduce the Band 3 quota to 5% of 1 beds/studios only 30.6 % of respondents agreed and 48% disagreed.

Alternative use of housing stock

- 3.47 As outlined above there is a pressing need for affordable temporary accommodation for homeless households in the borough. At present 50% of new placements and 90% of new supply consisting mainly of expensive nightly paid annexes (£6,500 pa) are outside the borough.
- 3.48 Empty properties from regeneration schemes are an important source of temporary accommodation as non secure tenancies (NST's). In June 2016 there were 252 NST's (158 Council and 94 RP). This is 11 fewer than June 2015.
- 3.49 All the Council NST's and 50% of RP NST's are due for return over the next 2 or 3 years. Some of these will be replaced by existing and new regeneration schemes but it is unlikely there will be sufficient to produce any overall increase in supply of these properties for temporary accommodation.
- 3.50 In response to the pressing need for affordable temporary accommodation in the borough Members are asked to give delegated authority to set targets each year for a number of general needs properties to be used for NST's in addition to the regeneration scheme properties already in use. A target of 100 units per annum including 50% of Right to Buy buy backs is proposed, the target to be reviewed annually.
- 3.51 Utilising social housing properties would enable affordable rents to be charged would reduce the Council's management costs and the costs of general fund subsidy for homeless households. This proposal would also reduce reliance on expensive B & B (£11,000 pa per household) and nightly paid annexes (£6,500 pa per household). In addition NST's are exempt from the Right to Buy and the annual 1% rent reduction.
- 3.52 It is proposed that suitable properties for NST's would be the least popular, for example, higher floors in blocks or where a property is not let on the first bidding cycle.
- 3.53 Reducing the Band 3 quota to 5% of 1 beds & studios if applied to lettings in 2015/16 would have released 38 two and three bed properties and 100 one beds or studios for alternative uses.
- 3.54 Given the high proportion of 1 beds/studios released from reduction in the Band 3 quota, and the high demand for temporary accommodation from small families, it is likely that the majority of properties used as NST's would be 1 bed/studios.

Discharge of homelessness duty into Private Rented Sector AST

- 3.55 From 2012 the Council had the power to discharge duty to a homeless household by offering a minimum 12 months suitable and affordable assured shorthold tenancy (AST) in the private rented sector, known as a Private Rented Sector Offer (PRSO). The Council exercised this power up until November 2014 and by doing so ceased a duty to over 70 households.
- 3.56 Following concerns expressed by Overview & Scrutiny and the former Mayor it was agreed to suspend the use of this power unless the applicant agreed to accept an AST. Since then ending the homeless duty by a private rented sector offer has happened on only two occasions.
- 3.57 On present trends it is unlikely that the private rented sector is likely to provide many options to discharge the homeless duty in this way. But there are occasions when the housing service might be able to discharge duty to a homeless case by making a suitable private rented sector offer. Members are asked to agree to re-instate this power which would be an additional tool in the armoury needed to respond to the challenges of meeting its statutory duty to homeless households.
- 3.58 The Council can only discharge its homelessness duty where the offer of accommodation is suitable and it would be reasonable for the household to occupy the property. This means all PRSOs (as with all final offers of accommodation to homeless households) must be affordable, the right size, in a suitable location with due regards to the employment, health care, education and social needs of the household. The Housing Options service determined that a PRSO would only be made where an Assured Short-hold Tenancy of at least 2 years was offered with the rent set at or below Local Housing Allowance. In almost all cases the properties offered were within the Borough and included properties which had received Empty Homes Grant from the Council, a condition of which is to offer the property for a minimum of five years to the Housing Options Service at or below Local Housing Allowance.

Lettings Plan 2016/17

- 3.59 Targets are set annually for Band 1B Priority Target Groups. Last year's targets, demand and performance against targets for 2015/16 are set out below.

Priority Target Group	Target	Demand @ 1 st April 16	Lets 14/15	Lets 15/16
Intensive Community Care and Support Scheme	35	9	32	25
Key Workers	15	6	9	16
Supported Housing Move ON Scheme/HOST referrals	75	13	55	38
Applicants Leaving Care	No Target	6	21	14
Sons & Daughters of CHR partner landlords	No Target	12	10	16
Armed Forces Personnel	No Target	0	0	0
Foster Carers	No Target	0	0	1
Retiring from tied Housing	No Target	0	3	0
Waiting List Decant	No Target	7	17	17
Totals			147	127
Band 3 Lets	10%		163	190
3 bed size			8	6
2 bed size			31	32
Bedsit/1 bed size			124	152

- 3.60 Cabinet is asked to consider and agree targets for the Priority Target Groups for 2016/17 and for these targets to be continued for 2017/18. This is because this report will be decided upon 5 months before the start of 2017/18. It is unlikely amendments to the targets will be required for 2017/18 and it would be efficient to agree to extend the targets now rather than return to Cabinet early in 2017/18.

Priority Target Group	Current Target	Proposed Target
Intensive Community Care and Support Scheme Referrals	35	35
Key Workers	15	15
Supported Housing Move On Scheme/HOST Referrals	75	75
Applicants Leaving Care	No Target	
Sons & Daughters of CHR partner landlords	No Target	
Armed Forces Personnel	No Target	
Foster Carers	No Target	
Retiring from tied Housing	No Target	
Waiting List Decant	No Target	
Totals	125	125
Band 3 Lets	Current Target	Proposed Target
	10% of 1 bed/studio, 2 and 3 beds	5% of 1 bed/studio only

Comments on the target groups

- 3.61 **Intensive Community Care and Support Scheme** – In 2015/16 24 applicants were rehoused against a target set of 35. Last year's report referred to keeping the target number above known demand figures to accommodate the likelihood of increase in applications from applicants with learning disability. It is proposed that the higher target is retained for 2016/17 for the same reason. Meeting this demand as it arises will create opportunities for applicants in supported accommodation to live independently and will create vacancies for new applicants in need of support.
- 3.62 **Key Workers** - In 2015/16 16 key workers were rehoused against a target of 15. Last year Cabinet decided this category should be restricted to applicants living in Tower Hamlets that met the residential criteria in the Allocations Scheme. It is proposed that the target of 15 is retained for 2016/17.
- 3.63 The professions that qualify for assistance in the Allocations Scheme are: fire fighters & police officers stationed in the borough; NHS nurses working in the borough; paramedics and teachers working in the borough's LEA maintained schools.
- 3.64 Members are asked to agree that social workers should be added to the qualifying professions in the Allocations Scheme. This is due to a request from Social Services because they are unable to attract experienced social workers from outside London due to the high cost of accommodation in London Therefore, the 3 years residency rule to join the housing list should be

relaxed for this priority target group to allow experienced workers to be recruited and retained.

- 3.65 **HOST Team Referrals (Supported Housing Move on Scheme)** - In 2015/16 38 applicants were rehoused and there were 23 waiting rehousing. Last year it was reported that greater use is being made of private sector accommodation which has led to a reduction in demand for lettings for this group. The need for social housing for some applicants will remain in order to create vacancies for new residents in need of support. As in recent years, the target has not been met but it is not proposed to reduce the target because demand is likely to increase due to Welfare Reform changes and the Council's difficulties in securing suitable private accommodation. If sufficient cases are not identified available properties will be offered as general lets
- 3.66 **Applicants Leaving Care** - In 2015/16 14 applicants were rehoused and 6 are awaiting rehousing. No target is proposed, as these applicants will be rehoused as required.
- 3.67 **Sons & Daughters of CHR tenants** - In 2015/16 16 applicants were rehoused under the severe overcrowding provisions in the Allocations Scheme where medical priority was awarded to a household member. There are 12 cases awaiting rehousing. It is not proposed to set a target as rehousing these cases on demand is in line with the Councils strategy to reduce overcrowding.
- 3.68 **Foster Carers** – In 2015/16 one applicant was rehoused. There are none waiting rehousing. No target is proposed as those who qualify are accepted as being in urgent need of rehousing.
- 3.69 **Retiring from Tied Housing** - There were no cases rehoused in 2015/16 and none are awaiting rehousing. No target is proposed as in these cases there is usually a contractual obligation to offer a rehousing from tied accommodation on retirement.
- 3.70 **Waiting List Decant** - In 2015/16 17 households were rehoused and 8 are waiting rehousing. Applicants qualify when they are living with a tenant in accommodation due to be decanted. No target is proposed as qualifying applicants are offered rehousing as required.
- 3.71 **Band 3 Quota** - It is proposed to amend the quota to 5% of 1 bed / studios properties in order to free up resources for overcrowded and homeless households.

Implementation of proposals

- 3.72 Subject to member agreeing the recommendations, proposals that are not IT dependent can be implemented immediately. However some changes will be IT dependent and development work will be required to configure the system accordingly, for example the proposal to create a new sub – band (2B) in

Band 2. It is anticipated that those changes that require IT development can be implemented within 3 to 6 months.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 This report seeks approval for various amendments to be made to the Council's Housing Allocations Scheme in order to reflect recent changes in legislation and also to address particular issues that have arisen in relation to homeless applicants.
- 4.2 The main financial implications of the report concern the costs of temporary accommodation. As a result of the combination of the increasing numbers of applications to the homelessness section, the scarcity of available temporary accommodation and the high levels of rent charged to the Council, significant budgetary pressures are being faced. This particularly affects the Housing Benefits budget where pressures arise from both the impact of welfare reform and the effect that high rents have on the Benefits Subsidy received by the Council.
- 4.3 Although the Council has a statutory duty to pay benefits, the level of subsidy that is recouped from the DWP is capped. The proposals in this report, in particular the recommendation that targets are set for a specific number of properties to be made available to be let as non-secure tenancies, should help to mitigate some of these costs by reducing the number of homeless applicants that need to be placed in the more expensive bed and breakfast accommodation (paragraphs 3.50 to 3.54).
- 4.4 Any costs involved in the implementation of the amended policy will be met from within existing resources. This will include any changes that may be necessary to the lettings IT systems (paragraph 3.72).
- 4.5 The cost pressures arising in the Housing Benefits budget will be closely monitored and addressed as part of the budget process for 2017/18.

5. LEGAL COMMENTS

Recommendations 1 & 2

- 5.1 The Council is required to comply with the requirements of Part VI of the Housing Act 1996 when allocating housing accommodation. Section 166A of the Housing Act requires the Council to have a scheme for determining priorities and the procedures to be followed in allocating housing accommodation. The Council is required to allocate housing in accordance with the allocation scheme.
- 5.2 Section 166A of the Housing Act 1996 specifies a number of matters that the allocation scheme must contain. In particular, the scheme must secure that a

reasonable preference is given to the following categories people with urgent housing needs –

- People who are homeless
- People to whom the Council owes a homelessness duty under the Housing Act 1996
- People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
- People who need to move on medical or welfare grounds
- People who would suffer hardship if they were prevented from moving to a particular locality in Tower Hamlets.

5.3 Section 160ZA(7) of the Housing Act 1996, provides that local authorities may decide who does or does not qualify for an allocation of social housing. This is subject to regulations made by the Secretary of State. The Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015 came into effect on the 20 April 2015 and provide that local authorities must not disqualify certain persons from social housing on the basis that they do not have a local connection with the authority's area.

5.4 The Regulations prevent an authority from applying a local connection test to existing social tenants seeking to transfer from another local authority area if they :

- have reasonable preference under section 166(3)(e) Housing Act 1996 because of a need to move to the local authority's area to avoid hardship, and
- need to move because the tenant works in the district, or
- need to move to take up an offer of work and if they were unable to do so, it would cause them hardship and that the tenant needs rather than wishes to move for work related reasons.

5.5 There is a significant risk of legal challenge to the Council's current scheme if it is not amended to include a sub band for applicants who meet the reasonable preference criteria but do not meet the 3 year residence requirement. It should be noted that the current exceptional circumstances exemption will not prevent a legal challenge against the Council. As set out in this report, the authority has a duty to comply with the regulations and minimise the risk of a legal challenge. In the cases of *Jakimaviciute v LB Hammersmith & Fulham* [2014] and *R (HA) v L B Ealing* [2015] the local authorities were unsuccessful in legal challenges relating to policies that either excluded certain categories of person or for reduced the defined 'reasonable preference' classes

5.6 When considering whether to adopt the proposed amendments to the scheme, the authority should consider the impacts of those criteria or requirements. This is to ensure that the persons in urgent housing need continue to receive 'reasonable preference' and that any policies adopted do not result in harsh and unexpected impacts. In making these amendments , the Council must consider the public sector equality duty to 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. . An equality impact screening has been carried out and the Service Head Strategy, Regeneration & Sustainability has confirmed that the nature of the proposals and the limited impact on any of the protected characteristics as defined by the Equality Act 2010 means that a full impact assessment is not required. A copy of the equality impact screening is set out at Appendix 1.

- 5.7 Section 166A of the Housing Act 1996 requires the Council to consult registered providers of social housing and registered social landlords before making an alteration to the allocations scheme reflecting a major change in policy. The proposed change is considered to be a refinement of the existing policy, rather than a major change.

Recommendation 3

- 5.8 The report proposes to restrict the policy that allows applicants to bid for smaller properties than their assessed bedroom need and allow room sharing where children of the opposite sex are under 10 years of age. This is permissible having regard to the bedroom standard and is specifically contemplated in the *Allocation of accommodation: guidance for local housing authorities in England*. It does mean, however that the household may become overcrowded when the children reach the age of 10.

Recommendation 4

- 5.9 The report proposes to amend the quota for Band 3 lets from 10% of one, two and three bedroom properties to 5% of 1 bed & studios per annum this is in accordance with the Lettings Plan. See recommendation 6 for further details.

Recommendation 5

- 5.10 The Council has a duty under the Housing Act 1996 to secure that accommodation is available for eligible homeless applicants. When the Council receives an application for housing assistance under Part VII of the Housing Act 1996, it has a duty to assess the applicant's circumstances to decide what help, if any they are entitled to.
- 5.11 The Council is required, as far as is reasonably practicable, to secure accommodation in its own borough (Housing Act 1996, section 208(1)). The clear intention is that local authorities should not simply decant homeless persons into areas for which other authorities are responsible for. However, the High Court has made clear that in areas of acute affordable housing shortage a local authority may decide that it is not reasonably practicable to accommodate people in its area. The Council can use its own housing stock to secure temporary accommodation under Part 7 in performance of its homeless duties. Such offers of accommodation will not create a secure or introductory tenancy (Housing Act 1985, Sch1, para4). How the housing stock is let is possibly a matter of housing management. However the small number of properties that it are to be let means that the proposal is unlikely to

substantially affect 'secure tenants' so as to trigger the consultation requirements of S105 Housing Act 1985.

- 5.12 In line with its homelessness statement and tenancy strategy, the Council must take steps to deal with the increased demand for housing by homeless persons and to provide more affordable temporary accommodation. The proposed changes to the Allocations Scheme detailed in the body of the report should enable the Council to achieve this and comply with its statutory duties to homeless persons under Part 6 of the Housing Act 1996. Further the Council has a duty to ensure continuous improvement in the way its functions are exercised having regard to a combination of economy, efficiency and effectiveness. The measures proposed within this report will assist the Council in meeting this duty.

Recommendation 6

- 5.13 It is consistent with the Council's statutory housing functions and its own allocations scheme for the Council to consider and adopt a Lettings Plan. The proposed Letting Plan has been prepared having regard to the housing demand in the borough and the lettings made in 2014/2015 and 2015/2016. It provides a means of ensuring that the Council effectively gives reasonable preference and additional preference to prescribed persons under the Allocation Scheme and in accordance with the Housing Act 1996. Consistent with the public sector equality duty the Lettings Plan needs to be subjected to a proportionate level of equality analysis.

Recommendation 7

- 5.14 The report proposes to add social worker to the professions that qualify for key worker status. The Scheme allows a local authority to define the classes of qualifying individuals as a result this is permissible.

Recommendation 8

- 5.15 Further, the report proposes that the authority discharges its homeless duty by offering private rented sector accommodation. Section 193 of the Housing Act 1996 sets out the duties to those housing applicants that the local housing authority are satisfied are eligible, homeless, in priority need and not intentionally homeless.
- 5.16 Once a housing duty has been accepted, the housing authority is obliged to provide housing assistance. Sections 148 and 149 of the Localism Act 2011 amended section 193 of the Housing Act 1996 by introducing a power that allows the Council to make Private Rented Sector (PRS) offers to end the main homelessness duty. The Homelessness (Suitability of Accommodation) (England) Order 2012 requires the Council to consider a number of factors to ensure that the PRS offer of accommodation is suitable.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 The policy changes should allow for housing resources to be better directed at housing applicants and homeless households in greatest need in the borough. It will also assist in providing suitable temporary accommodation in the borough for up to 100 households which will reduce costs to the Council.
- 6.2 The proposals have been subject to equality analysis as outlined in the attached checklist in Appendix 1. It is not considered that there will be any adverse impacts, or that further analysis will be required.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 The proposals in this report contain recommendations to re-direct some housing resources from applicants in a lower priority band (3) towards applicants in higher priority Bands (1) and (2). The proposals also include a recommendation to use a limited amount of permanent housing supply each year for temporary accommodation for the homeless. These proposals are aimed at making best use of these resources in line with the priorities set out in the Allocations Scheme, to support meeting the Council's statutory duties towards homeless households and reducing costs of temporary accommodation where possible.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 No environmental implications or impacts have been identified.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 The Council has statutory duties towards homeless households that includes provision of temporary accommodation at considerable cost to the Council. These proposals will help to maintain control over demand from the homeless and provide some additional temporary accommodation at lower cost in the borough.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 No contribution identified.

11. SAFEGUARDING IMPLICATIONS

- 11.1 No safeguarding risks or benefits from the proposals have been identified.

Linked Reports, Appendices and Background Documents

Appendices

- Appendix 1 - Equality Analysis Quality Assurance Checklist
- Appendix 2 – Tower Hamlets Common Housing Register Allocations Scheme

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

- None

Officer contact details for documents:

N/A

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)	Proposals to amend the Allocation Scheme as follows: - <ol style="list-style-type: none"> 1. Introduce National Right to Move scheme as required by new government regulations 2. Amendments to the Allocations scheme to respond to the risk of legal challenges to the 3 year residential criteria to be eligible to go onto the Housing Register. 3. Amendment to the Allocations Scheme to place an age restriction for children sharing when bidding for smaller properties than assessed need 4. Reduction to the quota of lettings to applicants in Band 3 who are not in housing need, in order to increase resources available for higher priority applicants in Bands 1 & 2. 5. To seek authority to use a limited amount of lettings each year to provide cost effective and suitable temporary accommodation for homeless households in the borough 6. Agree the annual Lettings Plan and to expand criteria to qualify for key worker status
Directorate / Service	Development and Renewal
Lead Officer	Rafiqul Hoque Service Manager – Lettings
Signed Off By (inc date)	Jackie Odunoye
Summary –	As a result of performing the QA checklist, the policy, project

or function does not appear to have any adverse effects on people who share *Protected Characteristics* and no further actions are recommended at this stage.

Proceed with implementation



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 proposals are: - to introduce changes required by new government regulation; to give access to the scheme to some applicants hitherto excluded by the residential qualification; to introduce some limitation on bidding for smaller property than assessed need which will reduce the risk of overcrowding; to seek authority for alternative use of a limited amount of housing supply for temporary accommodation to meet the need for such provision in the borough; to set out annual targets for special needs groups; to expand the criteria for professions eligible for key worker status to include social workers ; a reduction in the quota for the lowest priority band to divert resources to higher bands on the Housing Register.
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 equality profile of service users have been examined from existing data where appropriate for example in relation to a proposal to make changes to existing use of resources.
2	Monitoring / Collecting Evidence / Data and Consultation		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	Data required is available from existing data collection sources and housing applicant records
	Is there sufficient evidence of local/regional/national research that can inform the analysis?	Yes	Local data as 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	Data has been gathered and shared with specialist housing and managerial staff.
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	The proposals have been discussed between service areas and there has been consultation with service users.
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	Care has been taken to evaluate the impact of these changes on the many applicants on the Housing Register competing for scarce housing resources. It is believed that there will not be any disproportionate impact on any particular group.
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	<p>Work has been undertaken to assess and evaluate any potential disproportionate impact where appropriate. As properties are let through choice based lettings, which is a competitive bidding process with preference given by date order of registration, it is difficult to predict the outcome of the pattern of lettings throughout the year. However the composition of any of the three bands on the Housing Register could affect the balance of lettings outcomes if the band contained a disproportionate number of any particular group.</p> <p>The proposal to reduce the annual quota of lettings to the lowest priority band (Band 3) in the Allocations Scheme in order to increase the housing resources available to the higher priority bands (Bands 1 & 2) was examined to ascertain whether any disproportionate effect might occur by this transfer of resources.</p> <p>Analysis of the applicants in Band 3 by ethnicity compared with the composition of the whole Housing Register by ethnicity shows that the proportions in Band 3 are broadly in line with the proportions on the register as a whole.</p> <p>Closer analysis of the 3 bands by ethnicity and separated out by bedsize need shows more variation between the groups.</p>

			<p>This is to be expected as this will reflect local population characteristics and some difference in housing need profile in the borough.</p> <p>For example, an analysis of 3 bed need by ethnicity shows that the proportion of each ethnic group is broadly the same in each of the 3 bands. However in relation to 1 bed need Asian households are over represented in Band 2 compared with their overall proportion on the Housing Register. This reflects a higher level of overcrowding amongst Asian households in the borough than other groups. By contrast in relation to one bed need White households are over represented in Band 1 compared with their proportion on the Housing Register. This is largely due to a higher proportion of older white applicants in larger property that have applied for an under occupation transfer. This category is given high priority in the Allocations Scheme in Band 1 as it frees up family sized property which is in high demand. This benefits all applicants by making better use of the available supply of housing.</p> <p>Analysis of the impact of the proposal to move a modest amount of annual housing resources away from Band 3 to higher priority applicants in Band 1 & 2 indicates it is unlikely for there to be any disproportionate impact on any particular group.</p> <p>There are no indications that any of the other proposals will have a disproportionate impact on any particular group.</p>
4	Mitigation and Improvement Action Plan		
a	Is there an agreed action plan?	No	But the outcome of these changes if implemented will along with other significant factors relating to housing supply and

			demand, be routinely monitored and reported upon in annual Lettings Plan report.
b	Have alternative options been explored	Yes	<p>Regarding the new government regulations on the Right to Move, the Council is obliged to implement these changes. In relation to ameliorating the risk of legal challenge to the 3 year residential requirement to apply to go on the Housing Register, the proposed solution in the report was chosen following legal advice on the options and assessment of the implications of those options.</p> <p>The remaining proposals in the report were developed to make the best use of limited resources in response to pressures of demand for housing in the borough following consideration of alternatives and consultation with partners.</p>
5	Quality Assurance and Monitoring		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	All the above proposals will be monitored and analysed to ensure the right outcomes are achieved as part of the routine monitoring and management of supply and demand for housing in the borough and the reporting on performance against annual targets in the Lettings Plan.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics??	Yes	The data is available to monitor the impact and is reported on regularly and shared with Common Housing Register Partners.
6	Reporting Outcomes and Action Plan		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	Yes	

Appendix A

(Sample) Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the QA checklist, it is evident that due regard is not evidenced in the proposal and / or 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 proposal be suspended until further work or analysis is performed – via a the Full Equality Analysis template	Suspend – Further Work Required	Red 
As a result of performing the QA checklist, 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: 



The Common Housing Register Partnership

Partner landlords



Allocations Scheme

With effect from 20th April 2013

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Tower Hamlets Common Housing Register Allocations Scheme

Introduction

1. Many people in Tower Hamlets apply for the limited supply of social housing available each year. Tower Hamlets Council and its Registered Social Landlord partners have jointly created a Common Housing Register for everyone who applies for housing and is eligible and qualifying to go on to the Register. All available housing is offered to people on the Housing Register.
2. Although the Council and its partners work to provide as many homes as possible, there are many more people on the Housing Register than there are homes available. Many who apply will have little or no chance of being offered a home. Even those who apply and do have a chance may have to wait a long time.
3. People have many important reasons for wanting to move, such as being overcrowded, not having a secure place of their own, wanting to be nearer family, a friend, to work or wanting to move to another area.
4. However, some people must be rehoused because their homes are being demolished as part of plans to regenerate the Borough and to improve the quality of life for all residents. Other people live in homes that are larger than they need and therefore by moving to smaller homes their larger home can be offered to a family on the Housing Register.
5. Some people also need to be rehoused because where they live is very unsuitable. This may be because it is too small, is bad for someone with serious health or disability problems or needs such major repairs that it is not possible for them to live there whilst the repairs are being done. Other people are threatened with homelessness and apply for help.
6. All these competing demands have to be considered and difficult decisions made about who should be offered the limited number of homes available each year. As required by law, the Council and its Common Housing Register partners have developed this Allocations Scheme in order to decide how to give priority for housing. This was after consultation with applicants on the Housing Register, Tower Hamlets residents and other stakeholder organisations and partners.
7. Not having a good home is hard to bear for many people. An important aim of the Allocations Scheme is to make it clear how decisions are made so that people who are not offered a home can understand how priority for housing is decided and have trust and confidence in how decisions are made. Some people have very little chance of being offered a home and it is important this is made clear so that they know where they stand and can consider any other options they may have.
8. How applicants are assessed, the priority they are given and how it is decided who will be offered a home is set out on the following pages. The document is in two parts.
 - Part I – shows how priority is decided and how homes are allocated**
 - Part II – sets out the full Allocations Scheme in detail**

Equalities statement

9. We are committed to delivering quality services to all, responding positively to the needs and expectations of all users of the service. We are committed to eliminating discrimination on any grounds including race, gender, disability, age, sexuality, religion or belief. This commitment derives from our respect for every individual. This Allocations Scheme applies equally to everyone who applies to or is on the Housing Register.

Key links

10. This Allocations Scheme has been developed by having regard to the "Allocation of Accommodation – Guidance for Local Authorities in England", published in June 2012 by Department for Communities and Local Government. In developing this scheme the Council has also had regard to the Homelessness Strategy, Tenancy Strategy and Overcrowding Reduction Strategy. These documents are available on the Council's website.

Part 1 – Allocations Scheme Summary

How priority for housing is decided

11. The Council and its Common Housing Register partners have agreed to have three bands in the Allocations Scheme. Everyone eligible to be on the Housing Register will be put in one of three bands depending upon the information given at the time of application or following any change of circumstances. The bands are described below. Band 1 and Band 2 are the housing needs bands, where applicants attract reasonable preference; Band 3 is the housing options band where applicants have been assessed as having no housing need e.g. are not overcrowded. The norm for applicants in Band 3 will be that the Service will not initiate contact. For example, the regular reviewing of Band 1 & 2 cases (to establish any change in circumstances) will be substituted with the expectation that Band 3 households will need to inform any such changes. Enquiries on housing prospects, whilst receiving bespoke information for Bands 1 & 2, will involve Band 3 households being directed towards on-line self-help opportunities as facilitated by the wider services available from Housing Options.

The Three Bands

Bands	Catagories in each band
Band 1 High Priority Housing Need	Group A <ul style="list-style-type: none"> • Emergencies • Medical/Disability need for ground floor or wheelchair accessible property (category A & B) • Priority decants • Under-occupiers Group B <ul style="list-style-type: none"> • Priority medical • Priority social • Decants • Priority Target Groups and armed forces personnel in urgent housing need
Band 2 Priority Housing Need	<ul style="list-style-type: none"> • Overcrowded applicants • Homeless applicants
Band 3 General Housing Options	<ul style="list-style-type: none"> • Households with no defined Housing Need

12. How the bands are made up depends upon several factors. First of all the law says that the Allocations Scheme must give *'reasonable preference'* to people who are overcrowded, homeless or need to move on medical, welfare or hardship grounds. The law also says that people can be given *'additional preference'*, because of serious medical, emergency or social and welfare problems.
13. Applicants who must be given reasonable preference or who have been given additional preference are, depending on their circumstances, placed in the "Housing Needs" Bands 1 or 2 where they have a greater chance of being offered a home. Many councils are choosing not to register applications from people deemed not to be in housing need. Tower Hamlets recognises that those not in housing need might still want to be given the opportunity for a social housing tenancy, however small that opportunity might be. For that reason, non-housing need households will be placed in Band 3, being primarily registered for housing advice and options.
14. Therefore the Council permits some homes to be made available to applicants in Band 3 in order to meet local Tower Hamlets needs. The law allows for this as long as the amount of property set aside for this purpose does not dominate the scheme.

How do you decide which band my application will be in?

15. This will depend upon your circumstances at the time of your application or after notifying us of any change in your circumstances after you have been put on the Housing Register. For example, you may be placed in a lower priority band, but can be considered for a higher priority band after an investigation or assessment of any circumstances that may qualify you for additional priority. Similarly, your priority may drop if any change in personal circumstances dictates this. Appendix 1 sets out how these decisions are made.

I am on the Housing Register. What happens next?

16. Applicants on the Housing Register can apply through the Choice Based Lettings system for homes that are provided by the Council and the Common Housing Register partner landlords.

What is Choice Based Lettings?

17. This is a method of letting homes by advertising them so that applicants can "bid" for them. Some homes will be let through direct offers process but most of the homes provided by the Council and the Common Housing Register partners are let through this method. This way everyone can see the homes that are available each advert cycle and decide whether they want to apply for them.
18. Under Choice Based Lettings, applicants can bid for homes advertised each advert cycle. The highest priority eligible bidder for any one home is usually offered it first and then the next and so on until the home is accepted. Letting homes in this way means that applicants are considered for homes that they express an interest in. It therefore gives choice to applicants over property location and type.

Grouped bids

19. In certain circumstances, properties that are advertised may be grouped into one single advertisement. This will include advertisements for new build properties and those properties made available following regeneration schemes, where

properties will be grouped by property type and size. Where there are grouped advertisements, applicants who place one bid will be considered for all properties within the group.

There are four steps to Choice Based Lettings

Step One: Available homes are advertised

Step Two: Applicants can “bid” for up to three properties each advert cycle

Step Three: A short list is drawn up in priority order for each advertised home from those who have bid for it

Step Four: A home is usually offered to the highest priority bidder first. If refused it is offered to the next priority bidder and so on until it is accepted.

How do you decide between bids?

20. Applicants on the Housing Register are in one of the three bands. Each applicant will be given a preference date. How this is decided will depend upon the band and may change if an applicant moves from one band to another. See Appendix 2 for how ‘*preference dates*’ are decided.
21. When more than one applicant in the same band bids for a home it will usually be offered to the applicant with the earliest preference date in the band.

Are all properties let in this way?

22. Not all properties are let in this way. The Council is keen to allocate some properties to its Priority Target Groups. The Priority Target Groups are identified as those groups to whom a proportion of lettings will be made each year and includes groups such as foster carers, supported housing move-on, people leaving care. In addition, some homes will be let directly (see paragraph 78 for more information); and a small number will be made available to applicants in

Band 3 as part of the Lettings Plan. This is to reflect the Council’s strategic housing need and financial priorities. They are reviewed as part of the Lettings Plan periodically. The Council monitors the lets that are made to these groups and if Choice Based Lettings has not achieved the target lets; the Council will intervene via direct lets or restricted adverts.

Local Lettings Plans

23. From time to time the Council and its Common Housing Register partners may adopt local lettings plans for new build homes. The purpose of these is to encourage residents to develop lasting connections with the area; to help sustain a community; to reduce overcrowding and tackle other housing needs in the local area (see paragraphs 78 and 79).

Choice Based Lettings:

Application to Housing Register	Step One	Step Two	Step Three	Step Four
Applications are assessed and placed in one of 3 bands	Homes are advertised	Applicants bid for up to 3 homes in each bidding cycle	Shortlisting for each home from bidders: Band 1 Emergencies first Then: Group A: earliest date Then: Group B: earliest date Then: Band 2: earliest date Then; Band 3: earliest date	Homes offered to highest priority bidder first; then next highest; and so on; until the home is let

Part II – Allocations Scheme in detail

Making an application to the Housing Register

How do I join the Housing Register?

24. Everyone who wants to join the Housing Register has to fill in an application form. This is to make sure that we have the information needed to decide your priority for housing and to make sure everyone is assessed in the same way.

If you need it, we can help you to fill in these forms. Lettings, Housing Options and One Stop Shop staff, advice centres, local Housing Association offices and lots of other groups around the Borough will be happy to advise you about your application.

Normally, anyone can join the Housing Register so long as they:

- Are over 18 years of age
- Have lived in the Borough continuously for the last 3 years
- Are not guilty of bad behaviour
- Do not have a sole or joint income of more than £85,000 per annum
- Are not a home-owner

25. There are certain people who cannot join the Housing Register. These are explained in more detail below. Every application will be considered on its own merits and we will consider all circumstances before making a final decision on eligibility for the Housing Register.

What happens if you decide I am not eligible to be on the Housing Register?

26. If we decide that you are not eligible for the Housing Register, we will tell you

why. You can ask us to review the decision. How this is done is set out in Appendix 3. Every application is treated individually and we will take into account any exceptional or mitigating factors you ask to be considered.

Who is ineligible to join the Housing Register?

27. In consultation with the Common Housing Register partnership, the Council has determined that a number of categories of applicants will be ineligible to join the Housing Register. These are set out below:

Applicants with no local connection

28. The Council has adopted simple rules to define a person having a '*Local Connection*' – they must have lived continuously in the Borough for 3 years at the time of registration and need to remain resident in the Borough to preserve that registration. Any new homeless applicants will have to satisfy the 3 year continuous residency condition. However, in circumstances where a full housing duty is owed and a person is placed in accommodation pursuant to Section 188 and Section 193 of the Housing Act 1996, that is outside the Borough, this will be deemed to be in-borough for the purposes of accruing time towards the necessary 3 year residency condition.
29. A person cannot claim a local connection because they have employment in the Borough, or because they have relatives living in the Borough.

The local connection condition will only be applied to households who are

currently living out of the Borough or who have failed to establish a local connection already. Therefore, existing applicants at the time of the policy implementation who have achieved the current six months in twelve, or three years in five conditions, will not be affected. This also means that those households to whom a statutory homeless duty has been accepted will likewise not be affected by the changes. Safeguarding mechanisms will be employed where an individual household falls within one of the reasonable preference groups but has not yet accrued the necessary residential qualification. These mechanisms will include the capacity to still register an application if, upon review, the decision to otherwise exclude is deemed disproportionate.

In addition, some fundamental exceptions will be applied. These are defined as:

- As per the new regulatory requirement, for Armed Forces personnel
- Any application pursuant to a local or national mobility scheme
- Sub-Regional, or Regional, nominations
- Other recognised reciprocal arrangements

30. Other exceptional reasons, or where it is in the Council's interest to do so, subject to agreement of the relevant Service Head/Lettings Manager. An example would be to avoid an otherwise high cost for providing social care direct, when an out of Borough relative is willing to do so, and Social Care team confirm that the relative will be able to provide that care. In such circumstances, the Council will recognise a local connection and the requirement for the applicant to be moved closer. These cases will be

placed in Band 1 Group B either on medical or management ground.

Other exceptional circumstances

31. The above provisions attempt to capture when, typically, any class of household may be accepted on the Housing Register. In so doing, these reflect on broad categorisation around reasonable preference and the extent otherwise of local connection.

In addition to this, it is considered appropriate to preserve the capacity to either:

accept on to the Housing Register, or refuse to register

individual applications. Although not exhaustive, examples of the former could include specific social or other imperatives, whilst examples of the latter might embrace contrived applications or a deliberate worsening of circumstances. Acceptance or rejection decisions to join the Housing Register may be time limited and all decisions shall be in writing and subject to independent review by an officer senior to the decision maker.

Applicants with a history of bad behaviour

32. The Council does not allow access to the Housing Register to those applicants with a history of bad behaviour. Any applicant, partner or other member of their household who has been convicted of, or had legal action taken against them for violence, racial harassment, threatening behaviour, any physical or verbal abuse towards staff and residents in the applicant's neighbourhood, or who has been evicted for rent arrears. Legal action includes relevant convictions, service of injunction, behaviour causing the landlord to serve notice of intention

to seek possession, a court order or revocation of licence to occupy. An applicant who suffers from a mental illness and who has either been convicted or has had legal action taken against them as defined above shall not be ineligible if the conduct in question was directly attributable to their mental illness. In these circumstances the Council will usually require medical evidence to help determine the applicant's eligibility. Applications from people excluded under this section will need to demonstrate a change in behaviour. Usually, applications will be reconsidered after 3 years, during which time it must be demonstrated that there has been no repeat occurrence. Earlier reviews may be considered in exceptional circumstances.

People earning a high salary

33. Applicants will not be entitled to join the Housing Register where there is a sole or joint income of £85,000 per annum or more. This figure, set as of 31st March 2013, will be increased annually by the rate of RPI. Existing households at the time of the policy coming into effect will not be affected.

Homeowners

34. Homeowners are not entitled to join the Housing Register. An exception might be made where homeowners are unable to realise their assets to source their own housing solution. These applicants may be granted a management or medical priority, and would include such circumstances as:

An elderly person needs sheltered accommodation – likely this will place the application in Band 3.

A disabled person's home is unsuitable and it cannot be adapted – likely this will place the application in Band 1B (unless an 'Emergency').

There are other emergency medical reason to move – likely this will also place the application in Band 1B (unless an 'Emergency').

35. Applicants will be required to provide appropriate documentation, e.g. proof of ownership, valuation of the property, proof of income, report from social care team, hospital, GP, occupational therapist reports regarding the suitability and viability of adaptations in their current property and any risk to health or life in order for an assessment and decision to be made by the Council's Lettings team.
36. Any tenancy awarded under such circumstances may be of a fixed term.

What happens when I make an application to go on the Housing Register?

37. When your application to go on the Housing Register is received your details will be registered on a computer. We have a duty to protect public funds and the information you give on your form will, upon appropriate request, be shared with other public agencies (such as the Department for Work and Pensions), Council departments (such as Housing Benefits and Council Tax) or any other appropriate agency, solely to detect and prevent fraud. We will share the information you give us with Registered Social Landlords and other housing authorities for the purposes of housing nominations.

Obligation to be truthful

38. Section 171 of the Housing Act 1996 makes it an offence to withhold information that we reasonably require to assess your application, or to provide false information that leads to your gaining a tenancy. We will take appropriate action (including legal action) against anyone who gains a

tenancy through knowingly providing false information. This may mean you lose your home. A person guilty of an offence under this section is liable on summary conviction to a fine. Legal proceedings may begin if:

- i. any false information is given, or information withheld, on an application form to appear on the Housing Register
- ii. any false information is given, or information withheld, in response to subsequent review letters or other update mechanisms
- iii. any false information is given, or information withheld, by applicants during a review.

39. We will check if you, or anyone in your household, are already registered on the Housing Register. You can only be on one active application at any one time.

When someone else at your address wants to join the list

40. If you are a tenant of one of the partner landlords and someone living with you applies for separate housing, we will ask you to give an undertaking that, if you move, you will make sure no one is left in the property. Normally, until you give this written guarantee of vacant possession, you will not be able to bid for available homes and we will not actively consider your application.

Joint tenants who want to be re-housed separately

41. If you are a joint tenant you will be required to apply together or end your existing joint tenancy otherwise you will not be able to sign a new tenancy if you are made an offer through the Housing Register. You should seek legal advice before ending your joint tenancy.

Where the above situation arises because of relationship breakdown, you

must show formal evidence of separation, and end the existing tenancy before you can sign a new tenancy. Any cases accepted onto the Housing Register and subsequently made any offers will be subject to this condition.

Proof required

42. We may ask housing applicants to provide independent documentary proof of the following:

- identity;
- relationship to and between all those named on the application
- immigration status
- the property you currently live in – where, the occupation status and how long
- previous property details and reasons for moving
- if you have a local connection with the Local Authority area
- salary levels, proof of income e.g. pay slips, P60
- formal evidence proving separation and relationship breakdown
- main bank account into which benefits or salary is paid
- School letters
- utility bills
- proof of benefits including proof of receipt of child benefits
- Residence order

43. For every person on the application we must normally see at least two of the following forms of proof of identity, and proof of where they currently live and previously lived:

- full birth certificate;
- medical card;
- marriage certificate;
- driving licence;
- National Insurance card;
- passport.

44. We will then assess what priority your application has and tell you:

- which Band your application is in;
- your preference date;
- the size of property you can bid for.

Who can be on my application?

45. Only those in your immediate family, or others if previously agreed, will be registered as part of your household for the purposes of the Housing Register. Immediate family means the main applicant, their spouse or partner, their children (except as below) and anyone with whom they have to live because of extenuating circumstances. If you are the main applicant, immediate family does not include your or your partner's parents; grandparents; aunts or uncles; grandchildren; nieces or nephews; cousins; children over 18 living with a partner (whether married or not); children over 18 who have their own children; friends; lodgers; brothers or sisters.
46. If you have to live with someone that we do not usually define as immediate family because you have to provide or receive care or support you can ask us to review the decision not to include these people on your application. If there is a health need for you to live together the Council may seek advice from a health professional before deciding whether or not they should be included.
47. If there is a justifiable and genuine social need for you to live together the Housing Management Panel will make the decision. If you share custody of children with someone else, we will decide who is the main provider of care by looking at who is paid child benefit or tax credits and whom the children stay with for the most nights each week. If you are not the main care provider your

children will not normally be considered as part of your household for the purposes of the Housing Register.

What happens if I owe rent?

48. It is very important that you pay your rent. If you do not then you risk losing your home. If you are having difficulties then you should speak with your landlord who will be able to provide you with advice and support. If you owe no more than four weeks of your weekly charge (that is the net amount you have to pay after any benefit has been deducted), then your housing application will not be affected. You will be asked to sign an undertaking that you will pay any arrears before you move.
49. If you owe no more than 10 weeks of your weekly charge and you have been keeping to an agreement to pay off the arrears for at least 8 weeks then your housing application will not be affected. You will be asked to sign an undertaking that you will continue to pay the arrears if you move. If you owe more than 10 weeks of your weekly charge then you will normally not be considered for any homes you may apply for.
50. Each case will be considered on its individual merits by Common Housing Register partner landlords, the Council's homeless or lettings service. Discretion can be used by a manager to override arrears if it is considered that unreasonable hardship would otherwise occur.
51. If the Housing Management Panel makes this decision then you will be asked to make an agreement to pay your arrears and sign an undertaking that you will continue to keep to the agreement if you move.

When your application is accepted

52. You can then look at the properties

advertised in each advertising cycle and apply for those you are interested in and that are suitable for your household size and any medical needs. Each applicant is permitted to place 3 bids in each advert cycle.

What happens to my application if I am accepted as homeless?

53. If the Council accepts it has a homeless duty to you your application will be placed in Band 2 on the Housing Register or Band 1 Group B if you are accepted as single homeless and in priority need because of your vulnerability. Your preference date will be the date you made a homeless application. Any earlier preference date will be lost if you were already registered on the Housing Register.
54. If the Council has accepted a homeless duty to you and the Council recognises that you must have ground floor or wheelchair accessible category A or B property based on the recommendation made by the health advisor, you will be placed in Band 1 Group A.
55. If you are already on the Housing Register, your existing preference date will no longer apply. You will be given a new homeless preference date which will be the date you applied as homeless. Your position in the queue will change and you will not keep the time you have previously spent in the band.
56. You will then be able to bid for available homes that are advertised. If you have not moved in to a permanent home or private sector accommodation within 24 months then your application will be placed on Autobid for all suitable and reasonable vacant homes that become available. Refer to paragraph 65 for more information on Autobid. Where appropriate and justified due to high

priority of the applicants direct offers may be agreed by the Lettings Manager.

57. You will be made one offer of a suitable and reasonable home to ensure that the Council properly ceases any duty to you. Where necessary direct offers will be made. We cannot tell you how long this may take after the 24 month time limit is up. You will be asked to confirm the areas of the Borough or types of property that you cannot live in. This is not the same as properties you do not want to live in. You will be asked to explain why you cannot live in a particular area or in a specific type of home. You will not be asked to live in an area where you are not safe. If you are made an offer of suitable accommodation and refuse unreasonably, the Council will, in all likelihood, cease its statutory duty to you and you will be asked to leave any temporary accommodation provided by the Council. If you then secure your own accommodation and wish to be considered on the Housing Register, you must make a fresh application. You will be assessed on your new circumstances and be given a new preference date.

Choice Based Lettings: The four steps in detail

Step One – Advertising homes

How will I know about homes to be let?

58. Homes that become available to let will be advertised periodically. Currently, information is available on the Homeseekers and Council's websites, in East End Life, One Stop Shops, local housing and local Registered Provider offices. Policy, advertising mechanisms might change, but you will be kept informed of any such changes.
59. Where possible, the advertisement will have a photograph of the property or the block it is in and will endeavour to include information about:
 - who the landlord is;
 - the rent;
 - the sort of property it is: floor level, type and how many bedrooms;
 - the area it is in;
 - the size of household that can apply;
 - if there are special facilities for households with particular medical or other needs who will be given preference for it;
 - whether there are any special features or where certain conditions apply such as limited to applicants who qualify under a local lettings plan or priority target group.

Local Lettings Schemes

60. From time to time the Council and its Common Housing Register partners may adopt local lettings schemes. These schemes are designed to encourage residents to develop lasting connections with the area; to help sustain a community; to reduce

overcrowding and tackle other housing needs in the local area.

How these schemes would work

61. Homes available for letting at broadly the same time will be identified as suitable for local lettings. Usually these will be new build, Registered Provider homes. The qualifying criteria will be defined for each local lettings scheme including consideration only being given to applicants who meet the criteria set down for each scheme. The criteria may vary between schemes but will be made clear at the start.
62. The Common Housing Register Forum must agree a local lettings scheme. Homes will be advertised through the Choice Based Lettings scheme as only suitable for applicants who qualify for the scheme. Where possible bidding will be restricted to applicants who meet the criteria for the scheme. Applicants will then be short listed in the normal way and homes offered in priority order.
63. If it is not possible to let all the available properties earmarked for a local lettings scheme, the remaining properties will be let in the normal way and the policy criteria to qualify will not be applied. Properties suitable for applicants with high priority needs, for example with special needs adaptations, may be excluded from the scheme.

Step Two – Bidding for advertised homes

64.
 - You can place up to 3 bids per cycle (refer to paragraph 19 on grouped

advertises) on homes that are suitable for your size of household as set out in the table below.

- You should not bid for homes that you are unlikely to accept if they are offered to you.

Currently, bids can be made as follows:

- On line on the Homeseekers website
- By telephone
- Exceptionally, by the Autobid process

The Council will be introducing other mechanisms as technologies evolve.

Auto bidding

65. If the Council is satisfied that you are unable to register your own bid you can register your choices with us then we can bid on your behalf. These auto bids will act as if you have told us about an interest in an advertised home and you should be very sure about the choices

you make before telling us about them so that the auto bidding system can bid for the type of home you are willing to accept. If you are an accepted homeless applicant or priority social (management) case you will be given limited time for bidding before you are placed on Autobid and you will be considered for all suitable homes unless there is very good reason why you can't be rehoused in a particular area or accept a particular property type. This is to ensure you are rehoused as soon as possible. If you refuse a suitable offer of accommodation made under the Autobid option your priority will be withdrawn if under the policy you are entitled to one offer only.

What size home can I apply for?

66. You can only apply for a size of home suitable for the number of people in your household. How this works is set out in the table below.

Household size	Bedroom need	Bed spaces
Household 1 or 2 adults	Studio or 1 bedroom	1 or 2 bed space
Household with one child	2 bedrooms	3 or 4 bed spaces
Household with two children – same sex	2 bedrooms	4 bed spaces
Household with 2 children – opposite sex	3 bedrooms	4 or 5 bed spaces
Household with 3 children	3 bedrooms	5 or 6 bed spaces
Household with 4 children same sex or two of each sex	3 or 4 bedroom	5 or 6 bed spaces
Household with 4 children – 3 same sex 1 opposite sex	4 bedroom	6 or 7 bed spaces
Household with 5 children	4 bedroom	7 or 8 bed spaces
Household with 6 children – same or opposite sex	4 or 5 bedroom	8 or 9 bed spaces
Household with 6, 7 or more children	5 bedrooms or more	9 or 10 or more bed spaces

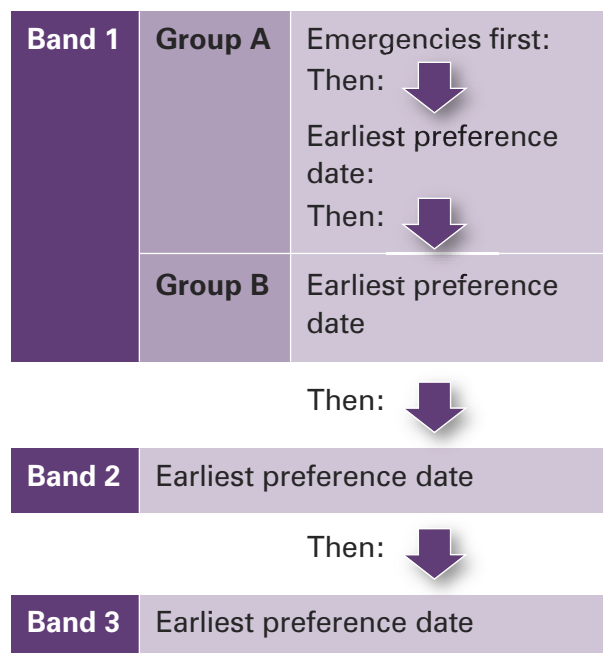
Can I apply for a smaller home than I need?

67. To ensure applicants do not face undue financial hardship when they move to their new homes, they will be permitted to bid for properties that have one bedroom and one bed space less than their assessed housing need. This will enable choice to many applicants who will be affected by the April 2013 Welfare Reforms and other financial imperatives allowing the selection of a home that is smaller than ideal requirements as assessed under the Allocations Scheme. If and when a family successfully moves into a new home which is smaller than their assessed bedroom need, any subsequent transfer application will start with a new date for that application.
68. A single parent will be classed as needing up to two bed spaces.
69. In the list above, two same sex siblings when part of the same household can share a bedroom regardless of age. If a sibling sharing in this way makes an individual application to live independently and not as part of the household, they will be classed as overcrowded for the purpose of the individual application.
70. A health advisor may recommend a size of property for you that is different to that set out above.

Step Three – Short listing

71. A short list will be drawn up from those who have bid for a home. Applicants who have bid for a home are selected by comparing the size of the home with the number of people on their application.

Short listing Priority Order



Step Four – Making offers of a home

72. Homes will be usually offered to highest priority applicant on the short list first. However, preference for ground floor homes will usually be given in priority order to existing management, decant or under occupying tenants currently living on ground floor or applicants recommended ground floor only accommodation on medical grounds.

If more than one applicant in the band applies for a home, it will usually be offered to the one who has waited the longest in the band, which is the applicant with the earliest preference date (see Appendix 2).

73. Where necessary, a number of applicants may be invited to view a property so that if the applicant with the highest priority does not accept the property it can be offered to another applicant without delay.
74. If a home has been advertised for a particular group in order to meet annual targets it will be offered to the applicant

in that group with the earliest preference date.

75. If an offer is refused it will be offered to the next applicant on the short list and so on until the home is accepted.
76. Landlords can reject an applicant, if after a financial assessment it is established that the applicant will not be able to afford the tenancy.
77. You should not bid for homes that you would not be willing to accept if they were offered to you. To help you make an informed choice about the properties that you bid for, the Homeseekers website will provide you with your position in the queue for that property at the time that you place the bid. This will be a snapshot, because applicants who bid after you may change your final position. However, it will give an indication of whether or not you have a reasonable chance of being short listed for that property.

Direct Offer Policy

78. The Council and its Common Housing Register partners will as far as possible let the majority of property through the Choice Based Lettings scheme. However, the Council and its partners can offer a home directly to some applicants without advertising the home through the scheme if circumstances justify it. Reasons for this can be: to meet the need of a high priority applicant; or to meet a legal obligation; to facilitate an under occupation move, or for effective management of the Council's or partners housing stock; in relation to public protection cases; as part of overcrowding reduction initiatives; or for split households.
79. Direct Offers can also be made on Sheltered Housing vacancies where the property has been advertised once and has not been let.

How will I know if I will be offered a home that I have applied for?

80. We receive a lot of bids for advertised homes. We will only ever contact the applicant who has been successful with the details of when they can view the property. Information on the position that you came for a property will be provided to you at the point of bidding so that you can make an informed choice.
81. When you view the property you will be told what repairs are to be done to it, whether any allowances are payable to help you move or decorate, and when you would be expected to move in. If you view a property on Monday, Tuesday or Wednesday your tenancy will usually start on the following Monday. If you view the property on Thursday or Friday, your tenancy will usually start on the second Monday after the viewing.

Is there any penalty if I refuse or not turn up to view it?

82. If you do not attend a viewing, this will be taken as you having refused the property unless there are very good reasons why you could not turn up AND you could not tell us beforehand. You must tell us if you are not able or not prepared to attend a viewing, giving at least 24 hours' notice.

What happens if I refuse three offers?

83. You should only bid for properties that you wish to accept the tenancy on if offered. If you refuse a home that is offered to you we will review your application. A 12-month demotion to the bottom of the Band your application is currently in will be enforced upon refusal of a third offer from the date this policy came into effect. In addition, this penalty will be repeated every time you refuse a subsequent offer. The original priority date will be restored on expiry of that 12 month period.

Does one offer only rule apply to you?

84. One offer only rule applies to cases awarded emergency, homeless, priority social (management), medical, priority target group priority. The details of this are covered below.
85. If you are offered a home as an emergency category on medical grounds and refuse the offer your priority will be withdrawn and you will be placed in Band 1 Group B as a priority medical category.
86. If your application has been awarded emergency management or is in priority social category, or a priority target group in Band 1 Group B and you refuse an offer unreasonably then your priority will be withdrawn. If you are in Band 1 Group B as a priority medical case and you refuse an offer, your case may be reviewed and consideration given to withdrawing your priority.
87. If you are an applicant where the Council has accepted a homelessness duty to then different rules apply. As an applicant that has been accepted as homeless, you will receive just one offer of accommodation. It is very important that you speak to someone in the Homelessness Team before you refuse an offer made to you as duty owed to you will be ceased.
88. You can ask us to review the decisions to withdraw any priority award. We will consider every review on its merits. However, on review justifiable and genuine reasons will have to be shown as to why the property was not suitable for you or why it was not reasonable for you to accept the offer. We will consider whether you have chosen the property (either in response to an advert or if the property meets the choices you have told us about in the past) when making a decision about the reasonableness of any offer you refuse. (See Appendix 3 on right to a review.)

Information about homes that have been let

89. We know it is difficult to wait for a suitable home to become available and that many applicants on the Housing Register can be under a lot of pressure. It is only natural that people will speculate about the reasons when they see someone else get a home where they may not seem to be in as urgent need as they are.
90. Please remember that someone may be rehoused before you because:
- their application was in a higher band than yours
 - they had been waiting longer than you in a band
 - they bid for a property you did not bid for
 - they were eligible for a home that you were not eligible for
 - they were overcrowded and you are not
 - their household has been given priority on health grounds
 - they had to move because of an emergency
 - they have had to move because their home is being demolished, refurbished or repaired
 - homes meets their specialist requirement e.g. are wheelchair accessible
91. We will publish information about homes that have been let and as far as possible give information about the length of time you may have to wait. This will be provided to help applicants make informed choices when bidding.
92. We will not publicise information about specific applicants and properties as that information is confidential, but the information given will show the type of home it was and the length of time a household had been waiting.

Other re-housing opportunities

93. If you are already a tenant of a landlord who is a member of the Common Housing Register partnership there are other re-housing opportunities you may wish to consider.

94. These schemes will vary over time, but opportunities that may be available are:

- move to a smaller property with a range of incentives and/or a cash incentive depending on your landlord
- mutually exchange your tenancy with another tenant
- participate in a chain lettings moves
- Cash Incentive Scheme – apply for a grant to help buy your own home
- Shared ownership where you could part buy part rent a home
- Move to the private rented sector including via a special initiative if you are overcrowded that provides financial assistance. See separate policy on this.
- Move out of the Borough if your landlord has housing elsewhere.

Under occupation or downsizing

95. We award a high priority to those tenants who want to move to smaller accommodation and who are prepared to give up at least one bedroom. You could move in or outside of the Borough although there will be limited scope for a move outside of Tower Hamlets.

96. If you are a transferring under occupier, you can apply for a home one bed larger than you need and you will be given priority to move as long as you give up at least 1 bedroom. If you are on benefits and under occupy your home you may lose benefit so please check

with the Benefits Team before making this decision.

97. If you live in a home with 3 bedrooms and you are assessed as needing 1 bedroom you will get priority if you apply for a home with 1 or 2 bedrooms.

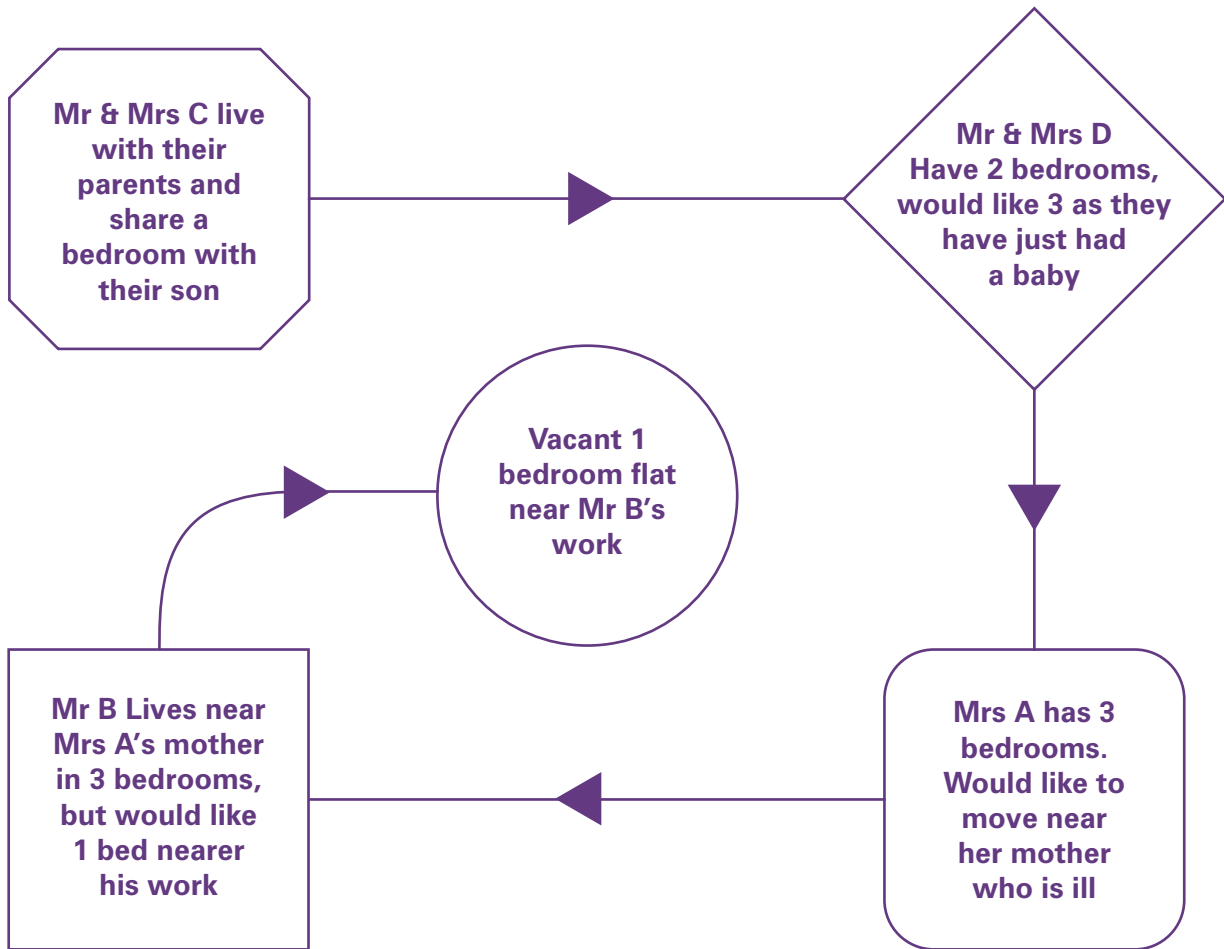
98. The greater the number of bedrooms you give up, the higher your priority to move. If you are a Council tenant and you give up at least 1 bedroom, the Council will be able to help you with a range of incentives depending on your needs e.g. help with removals, handy person service, help towards advance rent payment, payment for white goods etc. Incentives are reviewed regularly so please check with the Council what incentives are currently available. If you are not a Council tenant you should check with your own landlord what incentives, if any, are available for you.

Mutual Exchange Scheme

99. If you apply to the Housing Register for a move, when you move, it does not have to be to a vacant home. It could be a home that is currently being lived in by someone else who also wants to move. This is what happens when someone sells his or her home using an estate agent.

100. A mutual exchange is when two or more tenants swap homes once they have the permission of all landlords involved. Given the shortage of available homes in this area for many tenants this is their best prospect for moving.

101. All Council and RP tenants who ask to move may be registered for the mutual exchange scheme. Your landlord will work with you to try to find a partner to swap homes with you. If you are put in touch with a partner, neither of you are under an obligation to agree, nor will it affect your housing application if you refuse to swap. You can register for home swap at www.homeswapper.co.uk. The Council and many of the Registered Providers subscribe to this service, which means you may not need to pay to register. Details of your home will be advertised. However, your personal details, your full address, and your contact details will not be published without your express permission.
102. If you are an under occupying Council tenant who swaps homes with another Council tenant in the Borough whose home is too small for their family, we will offer you a range of incentives, which may be subject to change on a yearly basis.
103. Legally, your landlord can only say no to your request to exchange for a limited number of reasons:
- that either tenant is moving to a home that is inadequate for their needs, e.g. on health grounds, or that it would be too small;
 - that either tenant is moving to a home that is substantially too large for their requirements;
 - your landlord will usually agree to your moving to a home that has 1 bedroom more than you need, but no bigger;
 - that there is a current order for possession made by the Court in respect of any of the tenancies involved;
 - that any of the properties are adapted, sheltered, warden-controlled or other special needs unit and the tenant moving in to the property is not eligible for or does not need it;
 - that the accommodation is tied;
 - that the landlord is a charity and the proposed occupation would conflict with their aims;
 - that any of the tenants has been issued with a Notice of Seeking Possession.
104. Your landlord may say that you cannot swap tenancies straightaway if, for example, you owe rent, or there are repairs needed to the property that you have to carry out. However, once these matters have been sorted out, they should say yes.
105. Your landlord is obliged to tell you in writing the reasons why they are saying no to your request. Whatever the decision, you should be told within 42 days of requesting to exchange. You have a right to refer the decision to the County Court under Section 86 of the 1980 Act if you disagree with it.
- Chain Lettings**
106. Chain Lettings is a way for us to use a vacant property as part of a chain, in the same way as estate agents do in the private owner-occupying sector. Each year, we will set a target for the number of homes to be let to existing Council and partner landlord tenants. Wherever possible, these lets will be part of a chain of moves, and may include mutual exchanges.
107. This is an example of how a chain could work with one vacant home used to help four families to move:



108. In order for chain lettings to work, it is necessary for us to identify useful vacant properties and withdraw them from being advertised. Discretion has been given to senior officers to decide when properties can be removed from the overall lettings scheme to make chains work so helping more people to move.

Mobility Schemes

109. The Council currently participates in two separate mobility schemes. The first of these is designed to facilitate those social tenants who need to move to other parts of London for employment, educational or social reasons or if they under occupy their current accommodation. This is the Pan-London Mobility Scheme operating currently under the name "Housingmoves". Tenants of participating local authorities or housing associations who meet the

criteria are able to bid for 1, 2 and 3 bedroom homes that are advertised through the Housingmoves website. This is a reciprocal mechanism, with nominations out being matched by nominations in.

110. The second is the Seaside and Country Homes Scheme that offers tenants who are 60 years or older the potential to access to properties along the southwest coast from Cornwall through to the countryside from Shropshire to Cambridgeshire, over to Norfolk and Lincolnshire in the east. This scheme does not guarantee a move although it is recognised that the highest priority is available to those giving up large sized accommodation.

To find out more information about these schemes please visit www.housingmoves.org

Priority on health grounds

111. There are times when people need to move because of their health or a disability. Priority on health or disability grounds will only be awarded after an assessment if someone in the household has:
- a severe long-term limiting illness, or
 - a permanent and substantial disability
- AND**
- their health or quality of life is severely affected by the home they live in

112. **Please Note: A priority medical award is not given on the basis of the medical condition or disability alone but upon the effect the housing circumstances are having on a long term and serious medical condition or disability.**

How is it decided if I should have additional priority on health grounds?

113. An officer in the Lettings Team will make decisions on medical applications and may ask qualified health advisers to recommend who should be given additional preference for housing on health or disability grounds. The health advisor does not make a recommendation based upon how ill you are. They will look at how your health or disability problem affects you on a day-to-day basis and how your housing affects your health or quality of life. They will assess each person with a health or disability problem and also consider the impact on your whole household. In addition, other non-medical factors affecting you or members of your family can be taken into account where appropriate.

114. In reaching a decision on whether or not to make a priority award on medical grounds, an officer from Lettings, where appropriate, will have regard to comments and information from your own doctor as well as other medical professional opinions.

115. Case examples are given on the 'Homeseekers' website www.thhs.org.uk as a guide to the kind of decisions made.

116. There are two levels of additional priority on medical grounds linked to housing circumstances that can be awarded.

Emergency Medical Award

117. This is the highest priority award and will normally be considered where the criteria for a priority medical award is met **and** one or more of the following conditions also applies:

- someone is in hospital/residential care and cannot return home because it is not suitable
- there is a risk to life
- there are very exceptional circumstances
- when the Adult Services Directorate makes a nomination under the Independent Living and Community Support Scheme (see priority target groups in Band 1 Group B below).

118. When awarded emergency medical status, the application will be placed in Band 1 Group A. The preference date will be the date the award was made. Applicants awarded emergency priority are considered first within Band 1 Group A in preference date order when bidding for the available homes.

Priority Medical Award

119. This recommendation will normally be considered if you, someone on your application or for whom you provide care, has a severe long term limiting illness or permanent and substantial disability. Health or quality of life must be severely affected by the place you live in now.
120. **Please Note: A priority medical award is not given on the basis of the medical condition or disability alone but upon the effect the housing circumstances are having on a long term and serious medical condition or disability.**
121. We will also consider if where you live now can be reasonably adapted to meet your needs. It may also be that there are combinations of serious health or disability concerns that mean that the health or quality of life of a household is being severely affected.

Examples include:

- the current home does not reasonably allow essential health treatment there e.g. renal dialysis;
 - the ability to live independently in the community is at risk without suitable accommodation;
 - someone is housebound, effectively housebound or cannot reasonably access the essential facilities in their home;
 - if there are critical concerns about someone's safety e.g. through falls due to difficulties with access.
122. Applicants who are awarded priority medical status will be placed in Band 1 Group B (unless they are already in Group A as an under occupier). Your preference date will be the date you applied for the assessment.

Other recommendations that can be made on health grounds

123. The health advisor can also make recommendations about the type of property that is most suitable on health grounds. This can include access, space, location, or access to a garden.
124. When a property with one of these features is advertised, preference for it may be given to applicants where a recommendation by health advisors has been accepted.

If a specific recommendation has been made by the health advisor that a specific type of home or facilities are *essential* you will only be considered for homes that meet this recommendation.

Some specific housing need recommendations that can be made

(a) Use of a Garden

125. The health advisor will normally make this recommendation if there is a capacity to benefit from a safe supervised outdoor play area by a child under 18 in your household with either:
- a permanent and substantial physical disability;
 - severe long term limiting illness;
 - the severest forms of learning disabilities; or
 - the severest forms of behaviour problems.
126. A garden may be recommended for an adult in the following circumstances:
- if they have a severe cognitive impairment that means they do not sense danger, are at risk of wandering and so need constant supervision;
 - if they have a severe, permanent and substantial disability or severe long term limiting illness.

- limiting illness and caring for children is causing concern such that their continued residence is at risk, or the stress of caring for them is exacerbating the health problems; or
- if they have a sensory impairment and/or a guide dog and they live alone or only with others with disabilities.

(b) Extra space

127. The health advisor will normally only recommend that you need extra space if:
- you, or someone in your household, has either a permanent and substantial disability, or a severe long term limiting illness, or the severest form of learning disabilities;
 - or the severest forms of behaviour problems **and** it is unreasonable for you to share a bedroom as it would seriously affect the sleep of those you would normally share with, to the severe detriment of their or your health;
 - you are having health treatment at home that needs large machinery or a stock of health supplies to be stored e.g. you are having renal dialysis at home;
 - you need a full time carer to provide support night and day;
 - you have a permanent and substantial disability or long term limiting illness or
 - severe learning disability and need additional space for specialist equipment; or
 - you have a severe long-term limiting illness and sharing a bedroom will exacerbate your health problems e.g. you have an immune deficiency.

(c) Ground floor or category A or B wheelchair accessible on health/disability grounds

128. An additional recommendation that can be made is that an applicant must have ground floor on health or disability grounds or must have a ground floor property that is wheelchair accessible category A or B. This may be recommended by a health advisor if you have a permanent and substantial disability or severe long term limiting illness that means that your mobility or exercise tolerance is so severely restricted you cannot safely manage any stairs.
129. Applicants awarded the recommendation that they must have ground floor will be placed in Band 1 Group A unless no medical priority has been awarded. Apart from emergency status, Band 1 Group A is the highest possible priority in the allocations scheme. The preference date will be the date the application for an assessment was made.
130. Where an under occupier, decant, management applicant currently on the ground floor and in Band 1 Group A has bid for a ground floor property with an earlier preference date than an applicant who has been given a recommendation that they must have a ground floor property on medical grounds, discretion may be exercised to offer the property first to the applicant with the medical recommendation.

(d) Environment

131. The majority of the housing stock in Tower Hamlets is in blocks on estates. Some of these blocks are tower blocks, many are smaller blocks. Very little street accommodation becomes available each year. The decision as to whether an advertised home will meet your housing needs is best made by

you, sometimes with help, and dependent on you being given information about the property so that you can make an informed decision. The health advisor will only recommend a quieter environment if you have severe long term limiting illness or permanent and substantial disability where stress has been identified as a seriously exacerbating factor or you would be considered vulnerable living in a more active area.

(e) Care and support

132. If you need care because of your health problems, there are different ways in which support can be provided. You could live with the person you are supporting (or who supports you). Or you each may want to have your own home, but move nearer to each other. As you can choose to apply for advertised homes you should talk with the person you support (or who supports you) about the best solution to your support needs. You may want to consider both applying for homes in each other's areas to see who is successful first. Or it may be that one area is better for you both because it is near a particular doctor, or hospital, or other support. The health advisor will only give preference to an application where care and support are an issue if your application meets the criteria to be given preference on health grounds and there is no one currently living with you who can reasonably provide the support you need.

Homes that may be offered first to certain groups of applicants

Designated accommodation

133. There are some homes that have been designated for specific groups of people, either because of age, disability or other defined criteria. When this type

of vacancy occurs it will be advertised giving preference to those who meet the designated criteria. This will be specified in the advert and we will only let the property to a household that meets all the designated criteria.

Homes designated as wheelchair accessible category A or B

134. Will be allocated to applicants recommended for this type of property.

Homes with access to gardens or play areas, on the ground floor

135. There is a large demand for homes on the ground floor, with gardens. Preference for this type of accommodation may be given first to households that the health advisors have recommended should live in this type of home. Normally, tenants currently living on the ground floor and who are under occupying, being decanted, have been given a priority social award, and those recommended ground floor only on health grounds will be considered in priority order.

Homes provided by Registered Providers (RPs) with a specialist remit

136. There are Registered Providers who provide specialist services to specific groups of people in the local community. This can be because these groups of people have been disadvantaged in the past or have special needs. When one of these landlords has an available home it will be advertised only to those who meet the designated criteria. This may be specified in the advert or used when we come to decide who should be made the offer of the home. We will only let the property to an application from a household that meets all the criteria.

Discretionary Additional Priority

I have an urgent or unusual reason for wanting to move

137. There are times when an applicant may be considered for discretionary additional priority for unusual or urgent reasons that are not covered by the general criteria in the Allocations Scheme. There are also times when it is in the community's interest that a household is given additional priority for housing.
138. The Housing Management Panel will make all decisions to award discretionary additional priority under this policy unless an application is considered an emergency. In these cases a senior manager will make the decision.
139. The circumstances under which a discretionary priority award may be agreed are:
- i. Where an applicant has an exceptional need or where a combination of significant social/welfare/medical/safety or urgency factors occur that cannot be adequately dealt with within the normal rules of the Allocations Scheme.
 - ii. Where it is in the Council or a Common Housing Register partner landlord's interest to award additional priority for: effective management of the stock; for financial or legal reasons; or in order to support housing strategy objectives or priorities; or to remedy an injustice.
140. The purpose of having this discretion is to respond to exceptional cases. Whilst it is not possible to define all the circumstances where discretion should be exercised, any decisions should fall

within the guidance set out above for genuinely exceptional and justifiable reasons.

141. Decisions to grant discretionary additional priority should not be made in circumstances that do not reflect the broad direction of policy and priorities set by the Council and its Common Housing Register partners.
142. Some examples are given below as a guide.
- if moving will prevent a child or elder needing to live in institutional care;
 - if you are attending Court as a witness against someone accused of anti-social behaviour;
 - if you are threatened with or are experiencing violence and it is no longer reasonable for you to live at home;
 - if you are threatened with or are experiencing problems that mean it is no longer reasonable for you to live at home.
143. The list is not exhaustive and an award may not be made in every case where these circumstances apply. Each case will be individually considered based on the information and evidence available to the case.
144. The demand for homes in Tower Hamlets is so great that even with discretionary additional priority award you may have to wait a long time before you will be offered an alternative home. If you are a Council or Residential Social Landlord tenant all other options will also be considered to assist you that are set out in paragraph 93 onwards.
- If I want to be considered for additional priority what should I do?**
145. We will need to investigate your circumstances and gather information

and evidence in order to assess your claim.

146. First, you should tell your landlord why you want to move. If you are not happy speaking with your landlord about this, you can ask for help from staff in the Lettings Team, One Stop Shop, Housing Office, legal or other voluntary advice centres in the Borough.
147. In most cases, reports on behalf of tenants will be co-ordinated by their housing officer or equivalent. This will ensure staff managing the tenancy are aware of all issues affecting residents in their area.
148. If you are not a tenant, then a lettings officer will be assigned to the investigation if it is considered inappropriate for the investigation to be carried out locally.
149. You may ask someone else to make a request on your behalf. This may be a solicitor, a social worker, or other advocate. If a third party makes a request, it will usually be referred to your housing officer or lettings officer to investigate.
150. The officer managing your case will get information from all relevant sources and then submit it to the Lettings Team. It is in your interest to present all available information or evidence about the circumstances that you feel justifies you being considered for a discretionary additional priority award and therefore given greater priority for housing over other applicants on the Housing Register.
151. We will consider the reasons why you feel you cannot continue to live where you do now. We will also consider whether it is reasonable for you to live there, the support you have there and if there are actions that can reasonably be taken to help you to continue to live there. If there is no other effective solution available, giving additional priority for rehousing you may be decided upon as the most appropriate course of action.
152. We will not normally consider referrals on grounds of health or overcrowding as provision for this is already made elsewhere in this policy.
153. The officer dealing with your case will prepare a report that gives full details of the grounds for additional priority to be considered. This should include evidence from all relevant interested parties (such as the Police, Victim Support, Social Services, Schools, Anti-Social Behaviour Control Unit, health professionals etc.) This co-ordinating role is important as it ensures that local staff are aware of issues in their area.
154. We receive hundreds of requests each year to carry out assessments for priority on social grounds. The Lettings Team will make an initial decision on whether or not your application should be referred to the Panel. You will be told the decision and if you disagree with it you may ask for a review of the decision as set out in Appendix 3.

If you fear violence

155. If you feel unable to continue to live where you are because of fear of violence then you should approach the Council's Housing Options (Homeless) Service, which has a statutory duty to carry out an assessment and consider whether the Council has a housing duty to you. This includes if you are experiencing any type of hate crime, domestic violence, racial harassment, or other harassment from any other source. They will decide if a statutory duty is owed to you.
156. We are committed to taking all legitimate action against the perpetrators of

anti-social behaviour or hate crime. This could include taking legal action against perpetrators. The aim is to ensure that you have a safe place to live and where appropriate we will do all we reasonably can to secure this for you.

157. We will not give priority for housing to the perpetrators of anti-social behaviour unless there are overwhelming and justifiable reasons to do so.
158. Where a referral is made to the Homeless Service, Homeless Officers will explain to you what will happen.
159. Where appropriate your case can also be referred to the Housing Management Panel.

The Housing Management Panel

160. This is a panel of at least three officers, one of whom will be a manager. The Panel will make all decisions on requests for discretionary additional priority unless the case is considered an emergency. In these circumstances a decision can be made by a senior manager before a meeting of the Panel. Normally you will not be able to attend the Panel meeting, although in exceptional cases the Chair has discretion to agree to your attendance.
161. The officers on the Panel will not have had anything to do with your case previously. They will make a decision based on the information and evidence they are given about your case. It is therefore important that you tell the officer who is investigating your case everything that may be relevant.
162. The Panel sits regularly. If discretionary additional priority is awarded, the Lettings Team will write to you with the decision and any conditions of the award. If it is decided that no priority will be given, or that more information is needed before a decision can be made, then the officer investigating your case will write to you giving details.
163. We aim to inform you within five working days of the Panel meeting with details of the decision, the reasons for it and any conditions attached to it. If you do not agree with the decision you can ask for a review.

What additional priority may be awarded to my application?

164. There are two levels of additional priority that can be made to your application, a) additional priority social need award and b) emergency priority award. They are set out in detail below.

Additional priority social need award

165. This is one of the awards that can be made by the Housing Management Panel. If it is awarded the application will be placed in Band 1 Group B. Your preference date will be the date your case was first considered by the Panel.
166. The Lettings Officer managing your case will review the priority awarded to your application every three months to confirm whether the award made to you continues to be justified. If due to change of circumstances it is considered the award is no longer justified your application will revert to the status before the award was made. It is therefore very important that you continue to report anything that happens that may be relevant to your award.
167. It is important that you make an informed decision about the type of homes that will become available. The additional priority you have been given reflects a genuine and compelling reason for you to move. This will give you higher priority than most applicants in housing need on the Housing Register.

168. Offers with this award will be made on a like-for-like basis, unless there are sound reasons why this should not be the case. You will only receive one offer of suitable and reasonable accommodation. Where appropriate you may be made a direct offer.

169. If you have not moved to permanent accommodation within three months then your application will be included on lists for all suitable and reasonable vacant homes that become available. When considering what is suitable and reasonable, you will be asked to confirm the areas of the Borough or types of property that you cannot live in. This is not the same as properties you do not want to live in and you will be asked to explain why you are not able to consider them. You will not be asked to live in an area where you are not safe.

170. If you refuse a home that is offered to you, the additional priority awarded to your application will be withdrawn. If temporary accommodation has been provided this will also be withdrawn. If you do not attend a viewing, we will assume that you have refused the property unless there are genuine reasons why you could not turn up and you could not tell us beforehand. In addition, the penalties for refusals set out in paragraphs 82 - 86 of this policy document will apply.

171. If you disagree with a decision made you can ask for a review. (See Appendix 3). Whilst we will consider every review on its merits, for a review to succeed there should be genuine reasons why the property was not suitable for you or why it was not reasonable for us to make you the offer. We will consider whether you have chosen the property (either in response to an advert or if the property meets the choices you have told us about in the past); the circumstances that you have told us

about justifying your application being given higher priority; and the reasons why you feel the offer made was not suitable or reasonable.

Emergency priority award

172. This is the highest priority award available and will only be given in exceptional circumstances. Your preference date will be the date your case was first considered by the Panel or the date of an award if a senior manager makes the decision. If awarded, the application will be placed in Band 1 Group A. Applicants awarded emergency status are considered first for any suitable homes available.

173. The Lettings Officer managing your case will review the priority awarded to your application every three months to confirm whether the award made to you continues to be justified. If due to change of circumstances it is considered the award is no longer justified your application will revert to the status before the award was made. It is therefore very important that you continue to report anything that happens that may be relevant to your award.

174. It is important that you make an informed decision about the type of homes that will become available. The additional priority you have been given reflects a genuine and compelling reason for you to move. This will give you higher priority than any applicants on the Housing Register except emergency cases agreed before you.

175. Offers with this award will be made on a like-for-like basis, unless there are sound reasons why this should not be the case. You will only receive one offer of suitable and reasonable accommodation.

176. If you have not moved in to permanent accommodation within one month then your application may be included on lists for all suitable and reasonable vacant homes that become available. When considering what is suitable and reasonable, you will be asked to confirm the areas of the Borough or types of property that you cannot live in. This is not the same as properties you do not want to live in and you will be asked to explain why you are not able to consider them. You will not be asked to live in an area where you are not safe. Where appropriate a direct offer may be made.
177. If you refuse a home that is offered to you the emergency priority awarded to your application will be withdrawn. If you do not attend a viewing, we will assume that you have refused the property unless there are genuine reasons why you could not turn up and you could not tell us beforehand. In addition, the penalties for refusals set out in paragraphs 82 - 86 of this policy document will apply.
178. If you disagree with a decision made you can ask for a review (see Appendix 3). Whilst we will consider every review on its merits, for a review to succeed there should be genuine reasons why the property was not suitable for you or why it was not reasonable for us to make you the offer. We will consider whether you have chosen the property (either in response to an advert or if the property meets the choices you have told us about in the past); the circumstances that you have told us about justifying your application being given higher priority; and the reasons why you feel the offer made was not suitable or reasonable.
- When you need re-housing because of the condition of your home**
179. When a surveyor employed by either the Council or partner landlord reports that it is not reasonable or possible for you to continue to occupy your home while repairs are being carried out, your application will be awarded an emergency priority and placed in Band 1 Group A. The preference date will be the date the award was made.
180. Offers with this award will be made on a like-for-like basis, unless there are genuine reasons why this should not be the case.
181. If you have not accepted an offer of permanent alternative accommodation within one month of the award being agreed then your application will be included on lists for all suitable and reasonable vacant homes that become available. Where appropriate you may be made a direct offer.
182. When considering what is suitable and reasonable, you will be asked to confirm the areas of the Borough or types of property that you cannot live in. This is not the same as properties you do not want to live in and you will be asked to explain why you are not able to consider them. You will not be asked to live in an area where you are not safe.
183. You will be made only one offer of permanent alternative suitable and reasonable accommodation with this priority. If you refuse it then temporary accommodation will be secured for you for the duration of the repair works and you will be expected to move back to your home once the repairs are completed.
184. If we are not able to secure permanent alternative suitable and reasonable accommodation for you within 3 months of the award being agreed, or if it is not safe for you to continue to live in your current home, then temporary accommodation will be secured for you for the duration of the repair works.

The emergency priority award will be withdrawn and you will normally be expected to move back to your home once the repairs are completed.

What if I disagree with the Panel's decision?

185. If you disagree with any decision of the Housing Management Panel you can ask for a review (see Appendix 3).
186. Whilst we will consider every review on its merits, for a review to succeed there should be genuine reasons why the property was not suitable for you or why it was not reasonable for us to make you the offer. We will consider whether you have chosen the property (either in response to an advert or if the property meets the choices you have told us about in the past); the circumstances that you have told us about justifying your application being given higher priority; and the reasons why you feel the offer made was not suitable or reasonable.

How long before I am housed if I am awarded additional priority?

187. We are not able to tell you how long you can expect to wait before an offer of alternative accommodation is made to you. This is dependent on the number of suitable available homes that become available and the number of other applicants who may have greater priority than you. However applicants given emergency status are considered first for all the homes available. Applicants given discretionary emergency priority are in Band 1 Group A, the highest priority band in the Allocations Scheme.

Priority Target Groups

188. Listed below are groups of applicants that will be given additional priority because of their specific circumstances; or that it is in the community's interest

to do so; or where there may be a statutory duty. Applicants in these groups will be placed in Band 1 Group B and are referred to as '*priority target groups*'.

189. Targets will be set for these groups based upon the number of applicants who qualify for these groups and an assessment of the housing needs and priorities prevailing in the Borough in order to balance the group's needs with other applicants and the housing supply available. Targets will be decided in order to plan for the anticipated number that will require housing.
190. To qualify for a priority target group, you must be eligible for the Housing Register according to the prevailing Allocations Scheme. It is in yours and your sponsor's interests to provide sufficient information and evidence to demonstrate that you are eligible.
191. Unless otherwise stated, there will be no time limit on the choices you can make when your application is in one of these groups. When considering what is suitable and reasonable, you will be asked to confirm the areas of the Borough or types of property that you cannot live in. This is not the same as properties you do not want to live in and you will be asked to explain why you are not able to consider them. You will not be asked to live in an area where you are not safe.
192. It is important that you make an informed decision about the type of homes that will become available. You will receive only one offer of suitable and reasonable accommodation with this additional priority and if it is refused then the award will be withdrawn. If your application is otherwise eligible for the Housing Register it will be removed from the priority group and re-assessed for priority.

193. If you are offered a home but do not attend a viewing, we will assume that you have refused the property unless there are genuine reasons why you could not turn up and you could not tell us beforehand.
194. You can ask us to review the decisions to withdraw any priority award as set out in Appendix 3. We will consider every application for a review on its merits. For a review to succeed there should be genuine reasons why the property was not suitable for you or why it was not reasonable for us to make you the offer. We will consider whether you have chosen the property (either in response to an advert or if the property meets the choices you have told us about in the past); the circumstances that you have told us about justifying your inclusion in the quota group; and the reasons why you feel the offer made was not suitable or reasonable.

Care Leavers

195. The Council's Social Services Leaving Care Team will sponsor you for housing priority. If you have not moved in to permanent accommodation within 6 months then your application will be included on lists for all suitable and reasonable vacant homes that become available.

Intensive Living and Community Care and Support (ILCCS)

196. The Council's Adults Services department that administers the ILCCS scheme and sponsors single people living in hostel accommodation for housing priority. You will be considered for bed-sit or 1-bedroom properties only.
197. If you have not moved in to permanent accommodation within 12 months then your application will be included on lists for all suitable and reasonable vacant homes that become available.

Foster Carers

198. If the Council's Social Services Department will sponsor you for housing priority you will normally be considered for one additional bedroom to that needed by your immediate family.

Living in a decant block with a Council or CHR partner landlord tenant

199. You will be placed in this group if you have been living with a Council or CHR partner landlord tenant for the previous 12 months as your only or principal home prior to a decant being declared to the property.
200. If you have not moved in to permanent accommodation within 6 months then your application will be included on lists for all suitable and reasonable vacant homes that become available. Where appropriate you may be made a direct offer.
201. We are not able to guarantee that we will be able to help you with re-housing before the tenant has to move. If you are still living with the tenant when they have to move you will be expected to make your own arrangements for housing and you may be able to continue with your Housing Register application from your new address.

Sons and daughters of tenants of CHR partner landlords

202. Your application can be placed in this group if you have been living with your parents for the previous five years as your only or principal home, and they are tenants of the Council or a Common Housing Register partner landlord, and one of the following circumstances apply:
- your parents are registered on the housing register and their application has been awarded a health priority;

- you need no larger than a home with 1 bedroom and your parents are giving up a 4 bedroom home or larger because they have been successful for the Cash Incentive Scheme;
- you need no larger than a 1 bed home and your parent/s also wish to move to a smaller property where there is a net bed gain and a 2 bed or larger property would be available to let to another household on the Housing Register. In these circumstances we will make direct offers to both parties simultaneously to ensure vacant possession of the existing tenancy;
- your parents' household (excluding you and your immediate family and anyone else who is not their immediate family) is living in overcrowded conditions lacking two or more bedrooms.

203. We cannot guarantee that you will be offered housing before your parents move. If you are living with them when they move you will be expected to make your own arrangements. If they do not give their landlord vacant possession they may be asked to return any Cash Incentive Grant. If your parents fail to move once you do then, unless there are justifiable circumstances, your landlord will seek possession of your new home.

Retiring from tied accommodation

204. If you have been an employee of the Council or partner landlord and have been living in accommodation provided by them for the better performance of your duties for at least the previous five years and you are retiring due to age or health grounds.

Host Team Referrals (Supported Housing Move-On)

205. If you are living in supported housing provided by a RP and you no longer

require the specialist housing services provided with your tenancy. To qualify to be included in this priority group, your application should be supported by the Council's Adult Services Department and your landlord.

206. If you are accepted as homeless and vulnerable due to age; mental or physical illness; disability; risk of violence at home and/or your institutional background and have been placed in supported housing. The Council's Housing Options team will refer applicants under this scheme for a move through the Housing Register.

207. The Council's Housing Options Team administers the Rough Sleeper Initiative and sponsors single applicants living in hostel accommodation for housing priority. You will be considered for bed-sit or 1-bedroom properties only.

Key Workers

208. There are many public sector jobs where it is hard to recruit and retain essential staff. If you are employed full or part time on a permanent contract within the Local Authority area as one of the following you will be considered for inclusion in a target group:

- ambulance staff who are paramedics;
- fully qualified nurses working in the Borough's NHS hospitals;
- fire fighters and police officers stationed in the Borough;
- teachers working in the Borough's LEA maintained schools.

209. This scheme aims to help a small number of people in these occupations who do not currently have a social tenancy and/or do not currently live within a reasonable distance of their workplace.

210. There is a serious shortage of homes with four or more bedrooms. Therefore if your household needs this size of accommodation you will not normally be considered for this priority.

211. There are a small number of designated 'key worker' blocks and you will be able to apply for this accommodation in line with the prevailing Allocations Scheme.

212. Some of the housing providers in the Borough offer shared homes. The Council and partner landlord will only offer you this type of home if you tell them that you would be interested in it, or if there are a number of key workers who want to share.

Ex service personnel

213. Ex service personnel will have their applications assessed in line with this policy. Local connection criteria will not be applied. In some cases, where there is an urgent need for rehousing because of serious injury, illness or disability, applicants will be placed in Band 1, Group A. This is where a wheelchair home is required or emergency priority has been awarded because social or medical grounds apply.

Decants

What happens if a decision is made to refurbish, redevelop or demolish my home, and I have to move?

214. If you are a Council or partner landlord tenant and your landlord makes a decision that you have to move then we will do our best to ensure that you and your family are re-housed to a home that you will be happy in. This process is called '*decanting*'. It means that a property has to be empty for works to take place or a decision to demolish the property has been made. This usually happens only after residents have been asked for their views or when there has

been an emergency leaving the property unsafe. Unless otherwise stated here, the prevailing Allocations Scheme will apply to all applicants. You will be told the date on which your home has to be empty. This is called the '*clearance date*'.

215. Your landlord will usually talk to you about all the re-housing options available to you and your family. Some schemes may involve new homes being built. Others will mean you have the right to return to your old home once works are finished. You may wish to move to another part of the Borough or consider home ownership. We will try to help you make an informed decision about the best choices for your family. You will be asked to fill in a re-housing application form. If anyone in your household has special housing needs because of health or disability problems you will be asked to fill in a housing health assessment form.

Will I be offered new homes being built?

216. Many decant schemes include new homes being built to replace those being demolished. The new homes will usually be owned by a Registered Social Landlord, not the Council. You may be offered a tenancy with the new landlord. You will be told at the beginning of a decant scheme whether or not new homes are being built. If they are, then you may be given the choice of them. We will try to develop a new home that meets your family's housing needs but we cannot promise that in every case it will be possible. If more tenants want new homes than the numbers that are being built or more than one household wants a single plot, preference will be decided as follows:

217. Tenants with decant status where their clearance date is less than a year away; or need a 4 bed home or larger; or a

home that is wheelchair accessible category A or B, will be placed in Band 1 Group A. The preference date will be the clearance date. Priority for available homes will be given in clearance date order with the tenant with the earliest date being considered first and so on. Where tenants have bid for a home and have the same clearance date, any tenants with a medical award or are overcrowded will be given preference. If this does not resolve the issue, the tenant with the earliest tenancy date will be given preference.

218. Tenants with decant status in Band 1 Group A who have not received or accepted an offer within six months of their clearance date will have their case reviewed by a senior officer and where appropriate, their priority may be amended.
219. Tenants with decant status where their clearance date is more than a year away will be placed in Band 1 Group B. Their preference date will be the clearance date. Priority for available homes will be given in preference date order as above.

What happens if I have an "option to return"?

220. Some regeneration schemes mean that your current home will be refurbished. Sometimes your home will be demolished. In either case you may be given an option to return to the new properties built on the site of your demolished block or to your old home once works to it have been completed. You will be given a written promise of the option to return. Your landlord will find a temporary home for you to live in until you can return permanently. Wherever possible the temporary home will be suitable for your family's housing needs. However, if we cannot find a property that meets all your housing needs you may have to move to a home

that is like-for-like with the home you are leaving. You may be in a temporary home for some time, maybe years if a new home is being built. If you change your mind and want to stay in the temporary home permanently, wherever it is reasonable for you to do so we will agree.

Do I have to move to new homes built to replace my demolished home?

221. Wherever possible you will be given the choice of where you want to move. However, you will be given a date by which you have to make a final decision about whether or not you want to move to new homes being built. This is to ensure that a home will be available for you and choices about that home (such as layout, colours, fittings or adaptations) can be made whilst it is being built.
222. If you do not want to move to new homes being built then your application will be put in Band 1 Group A or B as set out above. You can then apply for any vacant properties that are advertised. Your preference date will be the clearance date your landlord has decided is necessary to have the properties empty. Preference will then be decided as set out above.

What happens if I do not apply for a new home before the clearance date?

223. Whilst we will try to help you find a new home that meets all of your choices it may not be possible. It is important that you make an informed decision about the type of homes that will become available.
224. If you haven't been able to identify a home you want then it may be necessary to serve a legal notice. This is a legal document that allows your landlord to ask a Court to instruct you to leave your home. You will not be

homeless if this happens, as we will have to assure the Court that we have suitable alternative accommodation available for you to move in to. This may be like-for-like the property you are leaving.

225. Serving a legal notice is always a last resort when you have not accepted any of the other housing options available to you. We have to do this to ensure that a decant scheme can proceed so protecting the interest and rights of other residents.

If my home is being decanted how many homes can I apply for?

226. Until you accept an offer of re-housing you can continue to apply for any homes that interest you up until six months before the decant scheme's clearance date.
227. If you have not moved by this date, then you will be made an offer of the next property that we consider reasonable to meet the minimum housing needs of your family. If you do not accept it then we may ask a Court to instruct you to move as described above.
228. If you are successful for an advertised vacancy and it is suitable and reasonable your landlord will expect you to move to it. If you do not and a legal notice has been served (as described above) either the property will be held for you or you will be made an offer of the next property that we consider reasonable to meet the minimum needs of your family. If you still do not move then your landlord may ask a Court to make you move.

What size home can I apply for?

229. You can apply for the size of home that meets the needs of your household, as described above in paragraphs 66 - 70.

230. However, if you currently live in a home that is larger than that standard you can apply for a home that has one bedroom larger than the standard to a maximum of the same size as your current home up to a 3 bed property. If you choose to apply for a larger home than the standard then it must be a flat or maisonette on the same floor level as you are now living. For example if you live in a 3 bedroom flat on the 4th floor and you need a 1 bedroom home you can apply for a 1 bedroom property on any floor level or a 2 bedroom flat or maisonette on the 4th floor or above.

231. There is a shortage of homes with 4 or more bedrooms so you will only be considered for this size home if you need it.
232. If you choose to move to new homes being built you will only be considered for the size of home that meets the needs of your household as set out in paragraphs 66 - 70.
233. If you are a Council tenant and you agree to move to a smaller home you will be entitled to the incentives that are available as set out in paragraph 98.
234. If, during the course of the decant, a separate re-housing application is received from your address that has been awarded additional priority because of the decant (e.g. if your son or daughter wish to be re-housed independently) you will only be able to apply for a home the size of your own assessed need.

Will I get help with the cost of moving?

235. If you have been living in the property for at least 12 months before a decant is agreed then a 'Home Loss' payment will be made. The Government, not your landlord, decides the amount, which is

reviewed annually. For joint tenancies only one payment is made. You will be told if there is any change in this amount following the annual review.

236. Your landlord will also pay reasonable removal expenses. This is for things such as the cost of hiring a removal van; disconnection and reconnection of services such as gas, electricity and your telephone; hiring a plumber to connect your washing machine and an electrician or engineer to move your cooker. You should always use properly qualified people and must ensure that a properly registered fitter carries out any works to your gas supply.

237. There is a maximum amount that will be paid. When your landlord visits to talk to you about the decant, they will tell you how much you can claim. You will be asked to provide receipts that show that you have paid for the service. In some cases your landlord may be able to give you some of the money before you move if you would otherwise have difficulty paying for services at the time of moving.

238. If you owe your landlord money, such as rent arrears, they may deduct it from any Home Loss or expense payments you claim. If the money you owe is more than you can claim you will be expected to make an agreement to pay the outstanding amount back.

What happens to other people who won't be moving with me? Will they get help finding a home?

239. Anyone who is not your immediate family, as defined above, will have to register separately for housing unless your landlord agrees otherwise. There is provision to house them through a priority target group in Band 1 Group B. To qualify for this group the person must be able to prove that they were living

with you in the property as their only or principal home continuously for at least 12 months before the decant scheme was agreed.

240. They must also be eligible to be on the Housing Register. Their application will be placed in Band 1 Group B. Their preference date will be the date the decant was agreed. They can then apply for advertised vacancies.

241. If they refuse a home that is offered to them their priority will be withdrawn. If they do not attend a viewing, we will assume that they have refused the property unless there are genuine and substantial reasons why they could not turn up and could not tell us beforehand.

242. They can ask us to review a decision to withdraw any priority award (see Appendix 3).

243. We will try to ensure that they have at least one offer before you have to move, but we cannot promise that this will happen. If they are still living with you when you are moving they will be expected to leave the property when you do and make their own arrangements for housing.

244. You have to give your landlord vacant possession of your home as described above. If you do not give vacant possession your Home Loss payment may be withheld and your new home may not be available to you.

245. Anyone who does not qualify for this additional preference may apply for housing in the usual way but will be expected to leave the property when you do and make his or her own arrangements for housing.

I own a home that is included in a decant scheme. Will I be re-housed?

246. Unless there are exceptional circumstances, we will not consider you for housing priority if you are a homeowner. We may be able to help you find shared ownership or other low cost home ownership opportunities, but once your landlord has negotiated to buy back your home, you will be expected to make your own arrangements for housing.
247. On the exceptional occasions that it is agreed a homeowner is to be considered for housing priority, they will be included on lists for all reasonable vacant properties that become available.
248. If you are offered a property that your landlord thinks is reasonable and then refuse to move to it, the property will be held whilst your landlord asks a Court to instruct you to move.
249. If you do not apply for a property then you will be made an offer of the next available property that your landlord considers reasonable to meet the minimum needs of your family and this will be held whilst your landlord asks a Court to instruct you to move.
250. If you have not moved within one month of the completion date of your property being bought back then you will be made an offer of the next property that your landlord considers reasonable to meet the minimum housing needs of your family. If you do not accept it then your landlord may ask a Court to instruct you to move, as described above.

Appendix 1 – How decisions are made to place you in a Band

Band 1 Group A

Emergencies

251. The decision to award an emergency priority can be made by a senior manager or the Housing Management Panel based on the individual circumstances of the household. It will usually consist of a combination of exceptional social/welfare/safety/medical and urgency factors affecting an applicant or their household that cannot be adequately dealt with within the normal rules of the Allocations Scheme (see paragraphs 117 and 172 - 178).

Decants

252. The decision to decant a block can only be made by councillors (for Council properties) and Management Boards (for partner landlord properties) (see paragraphs 214 - 250).

Ground Floor Priority/Category A or B Wheelchair Home

253. The decision to award priority for ground floor on medical or disability grounds is made following a medical assessment and recommendation by a health advisor (see paragraphs 128 - 130).

Under occupiers or downsizing

254. If you are an existing social housing tenant applying for a home with at least 1 bedroom less than you currently have (see paragraphs 95 - 98 and 102). (If you are a tenant of a landlord who is not a partner in the Common Housing Register then a reciprocal agreement will be required).

Band 1 Group B

Priority Medical Award

255. This award is given following a health assessment and recommendation by a Health Advisor (see paragraphs 119 - 132).

Priority Social Award

256. The decision to make this award is made by a Panel including a senior officer in circumstances as set out in this policy (see paragraphs 137 - 187).

Priority Target Groups

257. The decision to make this award is made by a Lettings Officer if evidence is provided to verify that an applicant meets the criteria for the relevant target group (see paragraphs 188 - 213 for details of the groups).

Priority Target Group – Single homeless in priority need due to vulnerability

258. The Council's Housing Options Service makes this decision following an assessment (see paragraphs 53 - 57).

Band 2

Homeless applicants with children and in priority need

259. The Council's Housing Options Service makes the decision on homeless applications whether the Council accepts a full statutory duty following investigation and an assessment (see paragraphs 53 - 57).

Overcrowded applicants

260. This will be based upon an assessment and verification of your circumstances as stated on your housing application. (Note: Single applicants lacking a room of their own will be included in this category. This includes applicants who have been found to be homeless but following assessment are not in priority need).

Band 3

Applicants who are not overcrowded

261. This will be based upon an assessment and verification of your circumstances as stated on your housing application. This will include applicants who are tenants of Common Housing Register partner landlords who are not overcrowded but wish to move to the same size property.

Appendix 2 – Preference Dates

262. Each applicant will be given a preference date on the Housing Register. In some bands this will be their original date of application. For others it will be a date of notification of their change of

circumstances especially where higher priority has been given. How the preference date is decided for each category in each band is set out below.

Band 1 Preference Dates

Group A	Sorted by emergencies first then earliest preference date as defined below.
Emergencies	Date of Award
Ground Floor Medical/Disability/Wheelchair Accessible Category A or B	Date of application for medical assessment
Priority Decants (less than a year to clearance date – or as a decant require 4 bed or larger – or as a decant require wheelchair accessible category A or B)	Earliest clearance date
Under Occupiers	Greatest number of bedrooms released first then date order of application

Group B	Sorted by earliest preference date as defined below.
Priority Medical	Date of application for assessment
Priority Social	Date of award by Housing management panel
Decants (More than a year to clearance date)	Earliest clearance date
Priority Target Groups	Date of application for the target group
Priority Target Group single homeless assessed as in priority need due to vulnerability where the Council has accepted a full statutory duty	Date of application as homeless

Band 2 Preference Dates

Overcrowded applicants on the Housing Register on the date this Allocations scheme is implemented	Original date of application (defined as the date the application was received)
New applicants who are overcrowded	Date of application (defined as the date the application was received)
Applicants who are not overcrowded on the date this Allocations scheme is implemented who have since become overcrowded	Date of notification of change of circumstances
Applicants moving from Band 1 to Band 2	Earliest preference date in Band 1 or 2 (if they were previously in Band 2)
Homeless applicants with children where the Council has accepted a full statutory duty	Date of application as homeless
Single non priority homeless	Date of application as homeles

Band 3 Preference Dates

Applicants who are not overcrowded	Date of application
Tenants of Common Housing Register partner landlords who are not overcrowded but wish to move to the same size home	Date of application
Applicants moving to Band 3 from Bands 1 or 2 due to change of circumstances	Earliest date of application

Appendix 2 continued:

What if my circumstances change?

263. If your circumstances change, for example you change address or your family composition changes, or you apply for additional priority on medical or social grounds you may be moved to another band and be given a new preference date. The following rules apply should this happen.

Rule 1:

264. When moving up a band, i.e. to a higher priority band, a new preference date based upon the change of circumstances will be given.
265. The reason for this rule is that an applicant will not overtake applicants that were already in the high priority band before them.

Rule 2:

266. If an applicant moves from Band 1 to Band 2 – they will retain the earliest preference date they were in Band 1 or 2 (if they were previously in Band 2).
267. Applicants in Bands 1 & 2 fall within the categories where the law states they must be given '*reasonable preference*' on the Housing Register. The reason for this rule is that if an applicant was in this category in Band 1, it is considered fairest that they do not lose time spent waiting in a reasonable preference category if they move to Band 2 where they will also be in this category. The preference date will be the earliest date the applicant was in reasonable preference category.

Rule 3:

268. If an applicant moves from either Band 1 or 2 to Band 3 – they will retain their earliest date of application.
269. The reason for this is that if, due to a change of circumstances, an applicant moves to a lower priority band they do not lose time already spent on the Housing Register in a higher band.

Appendix 3 – Right of review

What if you make a decision about my application that I do not agree with?

270. You can ask for a review on any decision that is made about your application. You should do this within 28 days of the decision being notified to you. If you ask us to review a decision to exclude you from the Housing Register, a more senior officer who did not make the original decision will carry out a review.
271. If you ask us to review a decision on the suitability or reasonableness of an offer of accommodation that you have refused so that the priority awarded to your application is withdrawn, a more senior officer who did not make the original decision will carry out a review.
272. If you disagree with the Council's decision following a recommendation by a health advisor, a review will be carried out by another health advisor who has not been involved in the first assessment of your application for priority on health grounds. The Council will make a final decision based upon the recommendation of the second health advisor.
- Further enquiries may be made at any stage of this process if appropriate.
273. If you ask us to review a decision about the priority awarded to your application by the Housing Management Panel, the Panel will first review any additional information or evidence that is presented. If you still disagree with the Panel's decision, a more senior officer than the chair of the Panel will carry out the review, which will be our final decision.
274. For reviews of any other decision made regarding your application, an officer who was not involved in the original decision, but not necessarily someone more senior to the officer, who made the first decision, will carry out a review.
275. If you wish to request a review of a decision it should normally be in writing. This is to make sure that we have a record of what you have told us.
276. In exceptional circumstances we will agree to you making the request in person. We will aim to tell you the result of a review within 56 days from the date of your request unless it is necessary to request further information. If more time is needed we will let you know. Normally, the decision is made more quickly than this. We will also tell you how we have made our decision.

<p>Cabinet</p> <p>1 November 2016</p>	
<p>Report of: Aman Dalvi, Corporate Director Development and Renewal</p>	<p>Classification: Unrestricted</p>
<p>Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing Benefits</p>	

Lead Member	Councillor Rachel Blake, Cabinet Member for Strategic Development
Originating Officer(s)	Adele Maher, Strategic Planning Manager
Wards affected	All wards
Key Decision?	Yes
Community Plan Theme	A Great Place to Live

Summary

The Local Plan is the Borough's most important planning document. It sets out a vision, strategic priorities, and planning policy framework that guides all development in the Borough. Its purpose is to help inform decision on planning applications and to meet the Council's national and regional planning policy duties.

The Council has identified the preparation of a new Local Plan as a priority for the Council, to help manage the future growth anticipated and to respond to major planning policy changes at a national and regional level that have taken place since the last Local plan was adopted in 2010 and 2013.

Cabinet on 1 November will be asked to approve *Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing Benefits* for public consultation from 11 November 2016 to 2 January 2017. This document (from here on referred to as the Draft Local Plan) has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulation 2012. It includes draft policies and potential site allocations and is supported by evidence.

The content of the Draft Local Plan was informed by national and regional planning policy to which it must accord; available evidence; and responses received from informal consultation to date. This includes information gathered during the initial informal consultation held between 14 December 2015 and 8 February 2016 on a document titled "Our Borough, Our Plan: A New Local Plan First Steps

All representations made in response to the public consultation on the Draft Local Plan will be taken into account and where appropriate, amendments will be made to its content. This will be published in the next iteration of the document called the Proposed Submission Local Plan, which will be published in spring/summer 2017.

In addition, an update to the Council's Statement of Community Involvement (SCI) will be consulted on at the same time as the Draft Local Plan. The purpose of the update is to bring the document up-to-date following changes to planning policy legislation and guidance at national/regional level. Following public consultation, the SCI will be amended and will return to Cabinet in spring/summer 2017 for consideration for approval.

Recommendations:

The Mayor in Cabinet is asked to:

- a) Approve the publication of the *Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing Benefits* (Appendix 1) for public consultation from 11 November 2016 to 2 January 2017;
- b) Approve the publication of the final *Tower Hamlets Draft Local Plan 2031: Integrated Impact Assessment (IIA)* and other supplementary information, including draft evidence base studies (as Table 1) on the Council's website alongside the *Tower Hamlets Draft Local Plan 2031: Managing the Growth and Sharing the Benefits*.
- c) Approve amendments to the documents in advance of public consultation, to be made through the delegated authority of the Corporate Director for Development and Renewal in consultation with the Mayor.
- d) Note for information that an update to the Statement of Community Involvement (SCI) will be published for public consultation from 11 November 2016 to 2 January 2017, to run alongside consultation on the Draft Local Plan. Following consultation the SCI will be amended and will return to Cabinet in 2017 for decision for approval.

1. REASONS FOR THE DECISIONS

- 1.1 The preparation of a new Local Plan must follow nationally set legal and procedural requirements that include a public consultation. Cabinet is therefore being asked to approve the commencement of this statutory public consultation exercise.
- 1.2 As well as meeting statutory requirements, a public consultation exercise is also required to meet with the Council's own expectations of good governance and transparent decision making by ensuring that local residents are able to help shape the Council's Local Plan.

2. ALTERNATIVE OPTIONS

ALTERNATIVE OPTION A: NO CHANGE TO EXISTING LOCAL PLAN

- 2.1 The Council could decide not to prepare a new Local Plan. However, for the reasons outlined below this option is not advisable. Should the Council delay its process of updating the current Local Plan documents there is a high risk that the Borough may not be able to fully plan properly for the additional new homes, jobs and infrastructure such as schools, parks, health facilities and transport needed to meet the extra demand from a rapidly growing population and to respond to the increased development targets for the Borough as set in the London Plan 2015. As a result the Council may not be able to maximise the social, economic and environmental benefits for our residents from development and to adequately support growth through infrastructure.
- 2.2 Furthermore, the preparation of a new Local Plan provides an opportunity to ensure the Borough's Local Plan policies best respond to updates and changes to national and regional guidance and legislation. Furthermore, the more up-to-date Local Plan could help in positively influencing the outcome of appeals against the refusal of planning permission. These opportunities could be missed without the preparation of a new Local Plan.

ALTERNATIVE OPTION B: PARTIAL REVIEW OF EXISTING LOCAL PLAN

- 2.3 The Council is required by the National Planning Policy Framework (NPPF) to ensure the Local Plan is up-to-date and in accordance with national and regional guidance and policies. The Council considers that the existing Local Plan (Core Strategy and Managing Development Document) satisfies this requirement. However, the rate of change and concentrated amount of development that has been coming forward in the Borough since 2010 is more rapid than what was anticipated as set out in the Core Strategy (2010) ; future population projection for the Borough is much higher than anticipated following the 2011 Census; and the London Plan has also updated the borough's development targets in 2015.
- 2.4 Taking these changes in combination, the Council could choose to respond by

review of only those policies in the current Local Plan that relate to development targets and the location of growth.

- 2.5 This option is not recommended for a number of reasons. Firstly, the vision contained in the Core Strategy (2010) no longer accurately reflects the future challenges, opportunities and aspirations of the Council and local community, as articulated in the Tower Hamlets Partnership Community Plan 2015. As a result it makes sense that a new vision for the Local Plan is prepared. Secondly, the policies in the Local Plan should be read as a whole and should be considered together, as part of any review. It will be difficult to separate the policies out and argue that they are disconnected and have not, in some way, been affected by changes to population and new government legislation and guidance. Lastly, the Core Strategy was adopted more than five years ago and much of the evidence base to support its policies was prepared before 2010. The Borough and national planning legalisation have changed considerably since then and it is advisable to do a whole review, to ensure the Local Plan policies function as effectively as possible.

3. DETAILS OF THE REPORT

Introduction

- 3.1 The Council has an existing Local Plan, consisting of a Core Strategy adopted in 2010 and a Managing Development Document adopted in 2013. These documents translate national and regional policy requirements into a local planning framework to guide development and decisions on planning applications in the Borough.
- 3.2 Tower Hamlets is anticipated to experience high levels of population growth and the London Plan annual housing target has been revised upwards from 2,885 units per year to 3,931 units per year since 2015. The Council is now positioned the highest with a requirement to deliver approximately 9% of the total annual housing target set for London. Compared to the neighbouring boroughs, the borough housing target is about 3% higher than London Borough of Hackney (6%), 6% higher than LLDC (3%) and 4% higher than London Borough of Newham (5%). This is far greater than DCLG's household projections (2014) and the borough's objectively assessed housing need of 2,428. However, given that London housing need is strategic, Tower Hamlets is required to not only meet its local need but also London's strategic housing need. Thus, the new target would mean that Tower Hamlets will need to absorb approximately 9% of Greater London's overall minimum housing target by 2025 within just 1.3% of the capital's geographical land area.
- 3.3 This will have a significant impact on the Borough's housing, employment, town centres, infrastructure and environment for the next 15 years. As a result the Council has committed to the preparation of a new Local Plan as a priority, to respond to these changes.

Draft Local Plan - Content

- 3.4 The Draft Local Plan covers a period from 2016 to 2031, for 15 years. The content of the new Local Plan reflects and responds to the changes in national and regional planning policy, evidence including assessment of the communities' needs, the Council's corporate priorities and the Tower Hamlets Partnership Community Plan 2015. The Draft Local Plan incorporates the vision, objectives and strategic policies currently included in the Core Strategy and the development management policies and site allocations currently included in the Managing Development Document. Both the strategic and development management policies are now included in one document the Draft Local Plan.
- 3.5 The Draft Local Plan vision and policies is focused on collectively aiming to achieving the following through new development in the Borough to 2031:
- Objective 1: Managing growth and shaping change; and
 - Objective 2: Spreading the benefits of growth
- 3.6 The structure and content of the Draft Local Plan can be viewed in Appendix 1. Chapters 1, 2, and 3 provide details on consultation, followed by an introduction, context and vision and objectives. It also notes the importance of the Borough's existing 24 places to the character and identity of Tower Hamlets and strategically considers how future growth will take place at a sub area level, in four identified areas: City Fringe, Central, Lower Lea Valley and Isle of Dogs and South Poplar Sub-Areas. This is expanded on in greater detail in Chapter 5.
- 3.7 Chapter four of the Draft Local Plan includes a range of strategic and development management policies, including the delivery of new affordable housing, as well as additional jobs and workspaces, improvements to public transport and walking and cycling infrastructure to meet the needs of both existing and new communities. It also includes design, heritage and environmental sustainability which are essential to the creation of sustainable and liveable places, of which all our residents will be proud.
- 3.8 Chapter five links to the spatial approach introduced in the beginning of the document, and elaborates on the approach by providing further details for each of the sub-areas and includes relevant site allocations.

Draft Local Plan – Preparation

- 3.9 The preparation of a new Local Plan must follow nationally set legal and procedural requirements that dictate: the stages of the plan preparation; who should be consulted and when; and what information is required to support the Local Plan. In particular, the new Local Plan must be prepared in accordance with the National Planning Policy Framework and must seek to meet the requirements of the London Plan.

- 3.10 The regulations also include the criteria against which the new Local Plan will be independently tested to ensure it is fit for purpose and ‘sound’ in planning terms. To be sound the new Local Plan must be:
- **Positively prepared:** for example that it positively seeks to meet the requirements of the London Plan;
 - **Justified:** that the policies in the Local Plan are supported by evidence and are reasonable justified;
 - **Effective:** that the policies in the plan can be delivered and have been formulated on the basis of effective joint working with partners; and
 - **Consistent with national policy:** that it has been prepared in accordance with the National Planning Policy Framework (NPPF)
- 3.11 The Council considers that the Draft Local Plan has been ‘soundly’ prepared in accordance with the appropriate legal and procedural requirements, including the requirements of the National Planning Policy Framework (NPPF 2012) and the Town and Country Planning (England) Regulations 2012.
- 3.12 The development of the Draft Local Plan also builds on a substantial body of existing work, in particular the content of the Tower Hamlets Partnership Community Plan 2015 which identifies the main pressures and priorities for the Borough and the policies in the existing Local Plan Core Strategy and Managing Development Document - the latter was examined, found sound and adopted relatively recently in 2013.
- 3.13 The Draft Local Plan has been informed by an informal consultation that was held from December 2015 to February 2016 on “Our Borough, Our Plan: A New Local Plan First Steps”. In addition, on-going discussions also took place with both internal and external colleagues through individual meetings, and regular Internal/External Stakeholder Group meetings, including:
- **Externally** - including Canal and River Trust, Network Rail, Environment Agency, London Gypsy and Traveller Unit, Greater London Authority, Transport for London and neighbouring boroughs through the established Local Plan External Stakeholders Group
 - **Internally** - through the input of colleagues across the Council at the regular Local Plan and Opportunity Areas Framework (OAPF) Officer Steering Group Meeting. These discussions were followed by presentations to the Directorate DMT’s and CMT’s over recent months, followed by separate engagement with specific officers; Mayor, the Cabinet lead for Strategic Development and Councillors.
- 3.14 The policies contained in the Draft Local Plan have been informed by findings from an updated and relevant evidence base to ensure that they are sound and justified, and able to be robustly defended at Examination in Public (EiP). The list of evidence is included below in Table 1. This will be published on 11 November for public information, alongside the Draft Local Plan. The list below is not exhaustive and only includes newly commissioned Local Plan specific reports. The content of the Draft Local Plan is also informed by existing and emerging strategies and evidence produced by the Council and

its partners including the LBTH Housing Strategy and the GLA's developing work on Isle of Dogs and South Poplar Opportunity Area Planning Framework (OAPF).

Table 1: A list of Evidence supporting the Draft Local Plan

Project	Details
Integrated Impact Assessment (IIA)	Meets the requirements of the EU Directive on Strategic Environmental Assessment and Habitats Assessment, and also covers health and equality.
Tower Hamlets Growth Model	This is based on the London Plan Strategic Housing Land Availability Assessment (SHLAA) and updated Borough SHLAA information can be found in the Draft Local Plan site allocations.
Employment Land Review (ELR)	Assesses supply and demand of employment land or floor space to inform Local Plan policies. All strategic sites put forward for inclusion as part of the Call for Sites have been included.
Town Centre Retail Capacity Study	Incorporates retail and leisure capacity study to inform Local Plan policies.
Waste Management Evidence	Identifies waste sites and assesses existing safeguarded waste sites.
Open Space Strategy	This reviews the quantity and quality of the Borough's existing open spaces. It also identifies the need for new open spaces.
Strategic Housing Market Assessment	This adds detail to the London Plan SHMA and identifies specific local housing need, in relation to market and affordable housing types, tenures and house size and the accommodation needs of specialist housing such as student housing
Gypsies and Travellers	Assesses the local accommodation need to identify whether or not site allocations are required
Strategic Flood Risk Assessment	Assesses the flood risk of our allocated sites, likely significant effects to certain sites in the Borough and what mitigation may be required in line with the requirements of the National Planning Policy Framework (NPPF)
Viability Assessment	Assesses the combined impact of Local Plan policies on development viability, to ensure the policies do not prevent development coming forward
Infrastructure Delivery Framework	Identifies the infrastructure required to support growth, potential funding sources and timeframes for delivery
Transport Strategy	Considers the impact of the growth planned for in the new Local Plan on the transport network, taking into account investment to improvements secured
Green Grid Strategy Update	This assesses the Borough's green grid network and identifies a Strategy for making the most of opportunities to improve the network in line with the London Plan's requirement
Tall Buildings Study	Identifies the most appropriate location for tall buildings in the Borough
Conservation Strategy	Provides a positive strategy for the management of the historic environment in line with the requirements of the NPPF

Draft Local Plan - Public Consultation 11 November 2016 to 2 January 2017

- 3.14 The regulation requires a six-week consultation period. However, officers recommend starting the consultation earlier and extending the total period to almost eight-weeks to account for the Christmas and New Year period.
- 3.15 The Draft Local Plan (Appendix 1), the Integrated Impact Assessment (IIA) and other supporting documents will be published on the Council's website from 5pm on Friday 11 November 2016. The public and stakeholders will be able to make comments online, via an online consultation portal, email or by post. The website will contain details of the consultation activities, as far in advance as possible. It should be noted that the Integrated Impact Assessment (IIA) at Appendix 1 is currently in draft, as minor changes to the draft Local Plan have been on-going. An addendum to the IIA will be provided prior to the Cabinet meeting with a final consolidated version then being provided for public consultation.
- 3.16 During this consultation period, a series of consultation events will be held to encourage public participation in the new Local Plan preparation process. Details of confirmed events are given below:

Table 2 Consultation events for Draft Local Plan

Date	Location	Time	Address
Thursday 24/11	Idea Store, Chrisp Street	12:30 – 15:30	15 Market Square, London, E14 6AQ
Saturday 03/12	V & A Museum of Childhood, Bethnal Green	10:00 - 13:00	Cambridge Heath Road, London E2 9PA
Wednesday 07/12	Alpha Grove Community Centre	17:30 – 20:30	Alpha Grove, London, E14 8LH
Wednesday 14/12	Idea Store, Whitechapel	17:30 – 20:30	321 Whitechapel Road, London, E1 1BU
Saturday 10/12	Idea Store, Bow	10:00 – 13:00	1 Gladstone Place, Roman Road, London, E3 5ES
TBC	The Space, Isle of Dogs	TBC	269 West Ferry Road London E14 3RS

Timetable and next steps

- 3.17 A summary of the indicative Local Plan preparation timetable is set out below:

Table 3 Indicative Timetable for Local Plan

Local Plan Key Stages	
Consult on the Draft Local Plan (Regulation 18)	Nov 2016 – January 2017
Publish the Proposed Submission Local Plan (regulation 19)	April/May 2017
Submission to the Planning Inspectorate	June 2017
Examination in Public	October/November 2017
Adopt the new Local Plan	March 2018

- 3.18 New Local Plans take on average two to three years to produce. Notwithstanding, at a national and regional level, planning policy is currently in a state of transition and flux, as the Government considers how it implements the Housing and Planning Act and the new Mayor of London considers a new Housing Supplementary Planning Guidance (SPG) and new London Plan, to be adopted in 2019.
- 3.19 The policies in the Draft Local Plan have been prepared to be adaptive and flexible where appropriate and possible, to respond to changes that may come forward. Officers are working closely with GLA colleagues to make sure that the policies contained in the Draft Local Plan respond to the overall thrust of the emerging new London Plan.

Statement of Community Involvement (SCI)

- 3.20 The Draft Local Plan has been prepared in accordance with the Council's commitment to engage the public in plan making, which is set out in the adopted Statement of Community Involvement (SCI) 2012.
- 3.21 The Council is taking the opportunity to amend references to the SCI that have been superseded and updated through more recent changes to national planning legislation and guidance. The Council will consult the public on these light touch changes alongside the Draft Local Plan from 11 November 2016 to 2 January 2017.
- 3.32 Cabinet approval is not required for the publication of the Draft SCI for consultation. However, following consultation the SCI will be amended and will return for Cabinet in 2017 for approval for adoption.

3.23 A summary of the key milestones for the SCI is set out below:

Table 4 Indicative Timetable for SCI

Key Milestones	Deadline
Public Consultation on proposed amendments	November 2016-January 2017
Amend SCI	Winter/spring 2017
Cabinet to seek approval to adopted "SCI Refresh"	Spring/summer 2017

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 Following consideration of the 'Our Borough, Our Plan: A New Local Plan First Steps' report by Cabinet in December 2015, this report outlines the subsequent stages that have been undertaken in the Local Plan production process and seeks approval to commence a statutory public consultation from 11th November 2016 to 2nd January 2017.
- 4.2 Whilst there are no specific financial consequences arising directly from the recommendations in the report, ultimately the Local Plan will underpin key decisions in relation to the allocation of the limited resources available within the Borough, and will influence the shaping of the Council's Medium Term Financial Strategy and Capital Strategy. In particular it will provide the basis for estimating the need for and cost of providing Council services based on changes to the boroughs 'population' together with the additional revenue generated from locally generated funding sources – Council Tax and increasingly Business rates.
- 4.3 The compilation of the various studies and evidence required to support the plan will set out some of the challenges that the Authority and its partners may face over coming years as a result of demographic and economic growth. Individual infrastructure developments will need to be subject to detailed planning at the appropriate time, including consideration of the financial impact on both partner organisations and on the Council. The Local Plan and supporting data will also provide evidence to determine the charging schedules in relation to Section 106 obligations and the newly introduced Community Infrastructure Levy, and to inform decisions concerning the appropriate use of the resources secured.
- 4.4 The main costs associated with the development of the Local Plan are staffing related and are financed from within existing resources. The consultation process will lead to expenditure on items such as advertising, printing, hiring venues and facilitating public meetings for which there is existing budgetary provision.

5. LEGAL COMMENTS

- 5.1 This report seeks Cabinet approval to commence a statutory public consultation process beginning on the 11th of November 2016 and running until the 2nd of January 2017.
- 5.2 The preparation, consultation upon, examination and adoption of a Local Plan is controlled by the Planning and Compulsory Purchase Act 2004 (“the PCPA 2004”) and the Town and Country Planning (Local Development) (England) Regulations 2012 (“the 2012 Regs”). Under these regulations two stages of statutory consultation are required and approval is currently being sought for the first stage.
- 5.3 Pursuant to Section 19 of the PCPA 2004 as part of the Council’s development plan, the Local Plan must:
- a. be prepared in accordance with the Council’s Local Development Scheme; and
 - b. taken as a whole include policies designed to secure that the development and use of land in the Council’s area contribute to the mitigation of, and adaption to, climate change.
- 5.4 The Local Plan must be in general conformity with the Spatial Development Strategy for London (known as the London Plan).
- 5.5 Section 19 of the PCPA 2004 and Regulations 8, 9 and 10 of the 2012 Regs set out the requirements for Local Plans and matters to which the Local Planning Authority must have regard in preparing the plan. Inter alia in preparing the Local Plan the Council are required to:
- have regard to inter alia national policies and advice contained in guidance issued by the Secretary of State and the Spatial Development Strategy for London (i.e. the London Plan);
 - comply with the Council’s Statement of Community Involvement;
 - carry out an appraisal of the sustainability of the proposals in the document and prepare a report of the findings of the appraisal; and
 - comply with the duty to co-operate with other local planning authorities and prescribed bodies and persons in respect of strategic matters.
- 5.6 Regulation 18 of the 2012 Regs sets out who the Council must notify and invite to make representations in the preparation of the Local Plan. The Council must take into account any representations made in response to these invitations, and a statement must be prepared which summarises the main issues raised by those representations, and how these issues have been addressed in the Local Plan. The Draft Local Plan Consultation and Engagement Programme has set out how the Council will comply with the

consultation requirements (as well as the duty to co-operate), and is considered to go beyond our statutory requirements. As noted in this report, officers are confident that the consultation and preparation of the plan complies with the Council's adopted Statement of Community Involvement.

- 5.7 The Council are required to submit the Local Plan (along with all relevant documents and information as required pursuant to Regulation 22 of the 2012 Regs) to the Secretary of State for independent examination. An inspector will be appointed by the Secretary of State who will determine whether the Local Plan satisfies the relevant statutory requirements, whether it is sound and whether the Council have complied with the duty to co-operate.
- 5.8 In accordance with Regulation 19 of the 2012 Regs, prior to submitting the Local Plan to the Secretary of State for examination a further six week consultation period is required on the proposed submission version of the Local Plan. The Local Plan programme indicates that this further consultation will be undertaken in spring/summer 2017.
- 5.9 Following the public examination the Inspector will issue a report making recommendations as to the soundness of the Local Plan which the Council must publish, and the Local Authority will look to formally adopt the Local Plan in line with the Inspector's recommendations. This function can only be exercised by Full Council.
- 5.10 In carrying out the function of preparing the Local Plan, 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 report indicates that an equalities impact assessment has been carried out as part of the Integrated Impact Assessment and this should be updated as the policies evolve. The Integrated Impact Assessment will also ensure that the Council complies with its duties under the Conservation of Habitats and Species Regulations 2010 and the Environmental Assessment of Plans and Programmes Regulations 2004.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 A full equalities screening and if required Equalities Assessment has been prepared alongside the Draft Local Plan. This is included as part of the Integrated Impact Assessment. Officers will continue to work with the Equalities team to make sure that actions are undertaken to mitigate the likely impacts on the equality profile of those affected by the Draft Local Plan.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 A new Local Plan will enable the Council to continue to ensure that the delivery of housing and infrastructure is optimised, and that benefits continue to be secured for the wider community. The development of sites following the policies and guidance of the new Local Plan will generate section 106 and Community Infrastructure Levy (CIL) contributions where relevant. This may

include the delivery of new affordable housing, local enterprise and employment opportunities, public realm enhancements and infrastructure.

- 7.2 Undertaking a range of consultations with council services and partners, as well as residents, will ensure the new Local Plan incorporates a full range of local priorities and is underpinned by a full and thorough evidence base. This will improve the likelihood of the plan being found sound when examined.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 A Sustainability Appraisal (SA) is a legal requirement for the preparation and development of the Local Plan. Under the Planning and Compulsory Purchase Act 2004, a Sustainability Appraisal must comply with the requirements of a Strategic Environmental Assessment (SEA). A SEA ensures that environmental issues are incorporated and assessed in decision-making throughout the entire plan making process. The SA report is prepared alongside the draft of the new Local Plan and submitted to the Secretary of State alongside the new Local Plan.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 Progress on the new Local Plan is being regularly reported through a number of internal groups that consider risk management issues and mitigation measures. These include:

- Local Plan Internal Stakeholders Group
- Development and Renewal Directorate Management Team
- Corporate Management Team

- 9.2 A Project Initiation Document (PID) was approved by Corporate Management Team in May 2015. Officers are working collaboratively across the relevant Services on the development of the new Local Plan and its evidence base through Corporate Management Team and the Local Plan Internal Stakeholder Group. The Mayor of Tower Hamlets and Lead Member for Strategic Development has been briefed on the new Local Plan on a regular basis and they have provided significant input into the development of the Draft Local Plan.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 The Draft Local Plan is not considered to have any implications for crime and disorder reduction at this stage. However the next draft of the new Local Plan will contain policies that will seek to ensure that the design of developments minimise opportunities for crime and create a safer and more secure environment.

Linked Reports, Appendices and Background Documents

Linked Report – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

1. NONE

Appendices


1. Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing Benefits
2. Tower Hamlets Draft Local Plan 2031: Integrated Impact Assessment (IIA)

Background Documents

No background documents related to the subject matter.

Officer contact details for documents:

- Adele Maher, Strategic Planning Manager
- Hong Chen, Local Plan Place Team Leader – x4778

<p>Cabinet</p> <p>1 November 2016</p>	
<p>Report of: Aman Dalvi, Corporate Director, Development & Renewal and Zena Cooke, Corporate Director, Resources</p>	<p>Classification: Unrestricted</p>
<p>Community Buildings Review - Recommendation Report</p>	

Lead Member	Councillor David Edgar, Cabinet Member for Resources.
Originating Officer(s)	Ann Sutcliffe, Service Head, Corporate Property & Capital Delivery Steve Hill, Head of Benefits Service
Wards affected	All wards
Key Decision?	Yes
Community Plan Theme	One Tower Hamlets

Executive Summary

In December 2015, the Mayor in Cabinet considered a report titled ‘Community Buildings: Allocation & Charging Policy’. The report established a number of principles in relation to the council’s community buildings portfolio and instructed officers to undertake a property-by-property review of the portfolio to gather information on the current occupiers, terms of occupation, the condition and the range and types of activities taking place in them.

The review of the community buildings estate completed in July 2016. Key findings highlighted that many of the community buildings are in a poor condition (and would be costly to repair), have a plethora of management arrangements (often with no formal allocation between landlord and tenant) and are largely underutilised (operating a limited number of hours, for users comprising a limited number of interest groups).

To remedy this and maximise the use of council resources, it is recommended a network of community hub buildings be established throughout the Borough in order to best serve local communities with good quality, relatively inexpensive accommodation.

Community Hubs will be designed in such a way so as to allow multiple occupation and usage of high quality facilities, which provides versatile, bookable spaces for community groups to use either on a regular, sessional basis or through an ad hoc booking/hire. It is envisaged that a large number of existing community building occupiers will move to a hub.

At present the vast majority of council-owned community buildings are currently let on tenancies-at-will at a rent of £1 per day. A tenancy at will is an insecure form of agreement that can be terminated at any point simply by telling the tenant that you want the property back.

For existing users of community buildings who do not move into a community hub, it is envisaged that the council will change them to a lease with a community rent for a period of 3 to 5 years to provide greater security. This will be granted where the building is well used, and that intensive use is likely to continue in the coming years.

In very limited circumstances, the council may issue leases at a peppercorn rent. This option will only be made available to tenants and residents associations (TRAs) that are formally recognised as such by Tower Hamlets Homes (THH) that meets the agreed criteria. The option of a peppercorn rent will be the exception rather than the norm. This will follow a validation process, to be carried out with THH, and this will only relate to their TRA activities.

It is recognised that actively investing in the local voluntary and community sector often represents good value for the public purse and helps Tower Hamlets Council achieve its social, economic and environmental outcomes. Consequently, through a consistent, transparent, and accountable process, it is proposed some community groups will receive a 'Community Benefit rent reduction' where they meet specified criteria set out in the council's Community Benefit rent reduction policy.

In some circumstances there may be a surplus of community assets, whereby community organisations have left community buildings vacant in order to move into a community hub. Where vacant property is released as a result of the move to hubs, then this will be considered as part of the council's asset and capital strategies, which may include converting it to meet other council priorities including provision of affordable housing for families and homeless people, the provision of nursery places for 2 to 5 year old children or to generate a return that is invested in other council services.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Agree that a network of community hub buildings be established throughout the borough;
2. Agree the key terms for leases as set out in paragraph 5.3;
3. Agree that where community groups are to remain in existing accommodation, that this occupation will be on the basis of a formal lease with a community rent;
4. Agree that in some cases, THH-recognised TRAs, who can demonstrate intensive use of the property, may be issued with a lease based on a peppercorn rent for their TRA activities;

5. Agree the community benefit rent reduction policy, which affords eligible organisations a subsidy of 80% of their market rent, as set out in section 13;
6. Agree the proposed criteria, independent assessment tools and process and the monitoring and reporting arrangements for the community benefit rent reduction policy as set out in paragraphs 13.8 to 13.24;
7. Agree the proposed plan and approach for implementing the community benefit rent reduction policy, working with THCVS to support the voluntary and community sector organisations; and
8. Note that the additional capital and revenue resourcing required for the delivery of the community buildings policy will be considered as part of the council's Medium Term Financial Strategy.

1. REASONS FOR THE DECISIONS

- 1.1 The voluntary and community sector is an important part of the fabric of life in Tower Hamlets and plays a unique and crucial role in the delivery of services to residents of the borough. The broad range of voluntary and community sector organisations in the borough also contribute towards building social capital and fostering community cohesion.
- 1.2 The recommendations in this report support the objectives set out in the Council's Voluntary and Community Sector strategy that was approved in May 2016.
- 1.3 The recommendations in this report establish the foundations of how the council will improve and enhance the council's community buildings offer; by increasing the availability of high-quality space in a more cost effective way that supports the borough's thriving voluntary and community sector while also satisfying the council's statutory duties.
- 1.4 It will ensure voluntary and community groups are treated fairly and consistently, in a transparent and accountable manner when bidding for or occupying community buildings.
- 1.5 The recommendations in this report will also ensure the portfolio of community buildings is fit for purpose and in a tenable state while recovering some of the expenditure the council incurs in owning, managing and maintaining this portfolio of buildings.
- 1.6 The recommendations will also ensure there are formal agreements in place providing greater clarity in the different roles and responsibilities of the landlord and tenant.
- 1.7 The adoption of these proposals feature in the Best Value Improvement Plan, which was produced by the council following the issuing of directions by the Secretary of State for Communities & Local Government.

2. ALTERNATIVE OPTIONS

- 2.1 The Mayor in Cabinet could choose not to adopt the principles set out in this report. This is not recommended as the adoption of the policy forms part of the council's Best Value Improvement Plan. In addition, having a policy will give certainty to the voluntary and community sector, which will enable them to better plan for the future in relation to their property and general resourcing needs.
- 2.2 The Mayor in Cabinet could choose a different set of principles. Any changes would have to undergo assessment and a further report will be brought back to Cabinet for the Mayor's consideration

3. DETAILS OF REPORT

CONTEXT & BACKGROUND

- 3.1 The London Borough of Tower Hamlets has a large estate; most recently valued at approximately £1.1bn. A small but significant part of the estate is the community buildings portfolio; while making up only less than 5% of the estate in value (£50m), a number of these buildings are used for much-needed services for local residents, provided by local voluntary and community sector groups.
- 3.2 In December 2015, the Mayor in Cabinet considered a report titled 'Community Buildings: Allocation & Charging Policy'. The report established a number of principles in relation to the council's community buildings portfolio and instructed officers to undertake a property-by-property review of the portfolio to gather information on the current occupiers, terms of occupation, the condition and the range and types of activities taking place in them.
- 3.3 This report sets out the outcome of those visits and the review and proposes a way forward that delivers on the Council's strategic property related objectives. The proposals in this report aim to improve and enhance the council's community buildings offer by increasing the availability of high-quality space in a more cost effective way that supports the borough's thriving voluntary and community sector while also satisfying the council's statutory duties.
- 3.4 The December 2015 report also set out proposals to develop a mechanism for considering the community benefit arising from the activities taking place in these buildings and translating this benefit into a rent reduction of some kind. The December report stated that this would be a separate mechanism to the issuing of leases, licences and other forms of occupation. This approach was set out to ensure there would be a separation between the management of the asset and any in-kind grant the council might offer to its voluntary and community sector tenants.
- 3.5 It should be noted that this report does not concern itself with the marketing of community buildings (which are set out in the council's Property Procedures for Disposals and Lettings, adopted by Cabinet in April 2015) and the process by which applications to lease a community building are assessed. The purpose of this report is to take steps to regularise the occupation of existing users, establish community hubs in order to increase the availability of high-quality space and set out proposals for a community benefit rent reductions scheme to support certain groups of tenants, who meet specific criteria, on leases.
- 3.6 In May 2016, Cabinet endorsed the Voluntary and Community Sector Strategy. The strategy itself was co-produced with the Tower Hamlets Council for Voluntary Services (THCVS) through a number of workshops and a

working group consisting of the Tower Hamlets CVS and officers from the Council. Key themes within the strategy include:

- Promoting co-production and sustainability
- Maximising the value from resources
- Creating a step change in volunteering
- Bring together businesses and the sector

- 3.7 With particular relevance to community buildings and community benefit rent reduction, the strategy states:

‘The “community benefit” consideration will provide organisations with a contribution to the rent cost if the criteria are met. The proposed criteria and methodology will be presented to the Mayor in Cabinet for consideration and to seek approval to consult on those proposals with the tenants and with the wider voluntary and community sector. The outcome of the consultation will be taken into account before the final decision is made and implemented. The intention is to have a simple and clear criteria and methodology that sets out the basis on which the community benefit is assessed and awarded.’

- 3.8 In addition to this the VCS Strategy Action Plan also makes specific mention of community benefit in that the council is to:

“Develop and consult on the criteria and methodology for measuring the community benefit provided by tenants of council buildings”

- 3.9 Commitment to co-production is at the heart of the approach in the strategy. This means the VCS will be an equal partner in shaping what the council does with the resources available; and working closely with partner agencies and people who use services to make sure local priorities are identified and delivered.

4. LEGAL FRAMEWORK

- 4.1 There are a number of legal obligations the council must consider when assessing rent and entering into leases and licences. For properties held in the General Fund, s123 of Local Government Act 1972 requires the council to secure the best consideration (price) reasonably obtainable when disposing of property. If the council wishes to dispose at a figure that is less than best consideration then it must obtain the consent of the relevant Secretary of State. There are limited exemptions to this provision which are not relevant for the purpose of this report.
- 4.2 Leases of less than 7 years are not subject to these provisions, although the council still has a fiduciary duty to local residents. For this reason, and in order to better manage the estate, the council is proposing that community groups are only offered leases of 3-5 years.
- 4.3 For properties held in the Housing Revenue Account (HRA), under the General Housing Consents 2013, the Council can only dispose of land for a consideration (price) equal to its market value. In this case, disposal refers to

a lease of any length. The Council also has a duty to ensure the Housing Revenue Account is not being used to subsidise or fund General Fund activities and vice versa. At present the majority of buildings forming the community buildings portfolio are held in the Housing Revenue Account.

- 4.4 There may be situations where the council intends to use properties currently in the HRA for General Fund purposes. An example of this would be if a building that had originally been intended to be a tenant hall was to be used by a general community group for services beyond the tenants on that estate. In such cases, the Council will consider transferring the property from the HRA to the General Fund. This will involve undertaking a valuation of the property, to determine its open market value, and making an equivalent payment to the HRA from the General Fund (or transferring an equivalent debt from the HRA to the General Fund).

5. **PRINCIPLES**

- 5.1 The vast majority of council-owned community buildings are currently let on tenancies-at-will at a rent of £1 per day. A tenancy-at-will is an insecure form of agreement that can be terminated at any point simply by telling the tenant that you want the property back. This type of tenancy is not covered by the protections contained in the Landlord and Tenant Act 1954 (LTA).
- 5.2 In the future, the council will only issue leases or licences (this can also be referred to as a hire agreement) for its community buildings and both forms of tenancy will require a rent to be paid. A licence simply confers a right to use a property or part of a property. It normally defines the hours of use the occupier is to be given as well as the area of the property that they are being given the right to use. A licence can normally be ended by giving notice but could also be for a fixed term.
- 5.3 A lease is a much more secure form of tenancy in that it creates an interest in the land. It provides security of tenure for the duration of the lease, except where certain lease conditions are not met, which could give rise to grounds for termination. These leases will be prepared on the following Terms:

Length of Lease	3 to 5 years
Rent	Open market rental value based on restricted D1 Use (referred to as 'community rent')
Rates	Tenant
Building Insurance	Landlord insures the building only. Premium recovered from Tenant
Contents Insurance	Tenant

Internal repair and decoration	Tenant
External repair and decoration	Landlord repairs and recovers cost through a service charge. In order to keep the cost of the service charge low, once initial repairs have been undertaken the landlord will only be responsible for maintaining the building wind and watertight plus periodic redecoration to preserve the fabric of the building. Repairs beyond this will be at the landlord's discretion following consultation with the tenant.
L & T Act 1954	The lease will be excluded from the provisions of S24 – 28 of the Landlord and Tenant Act 1954. This means that the tenant does not have an automatic right to renew at the end of the lease. However providing the tenant has complied with the terms of the current lease and the property is not required for redevelopment or other purposes then the council may renew.
Break option	In certain circumstances, where there is a possibility of the property being required for redevelopment purposes there may be a clause inserted giving the landlord the option of breaking the lease before the end date. There will also be a tenant's break clause as standard. This will allow tenants to respond to changes in the organisation's financial circumstances.

- 5.4 These leases will provide the tenant with exclusive possession of the property although sharing the property with other voluntary and community groups, using a licence, will be permitted, and indeed encouraged, in certain circumstances.
- 5.5 For leases, the rent will be on the basis of the 'community rent' for the property. The community rent will be arrived at following an assessment of the open market rental value of the property for community use; within planning use class D1. This value will be benchmarked against local comparables, but will also reflect the condition, size and limitations of use of the building. The tenant may be eligible for a rent reduction or subsidy under the proposed community benefit rent reduction scheme (see section 13 below).
- 5.6 In very limited circumstances, the council may enter into a lease based on a peppercorn rent (e.g. £1 per year). However, these will be limited to Tenants and Residents Associations (TRAs) for their statutory functions who are recognised by Tower Hamlets Homes, the council's housing arms-length management organisation. The community building must form part of the Housing Revenue Account, be well used and in good condition.

- 5.7 As part of this process, the council will work to Tower Hamlets Homes to validate the status of existing TRAs who currently use council-owned buildings. This will include ensuring:
- The organisation has a constitution that has been agreed with Tower Hamlets Homes and sets out their aims and objectives as well as a clearly defined geographic boundary ('their area') for the organisation;
 - the primary aim of the organisation is to represent the views, concerns and interests of residents within their area on housing related issues;
 - ensuring membership includes all residents over the age of 16 within their area and all potential members are invited to general meetings;
 - ensuring attendance at meeting is monitored to ensure successful representation of all (potential) members within their area;
 - the organisation must adopt and demonstrate commitment to the Tower Hamlets Homes Equal Opportunities Policy; and
 - ensuring clear and accurate financial records are maintained and robust financial systems are in place.
- 5.8 The council will normally only enter into leases of 3 or 5 years. In order to consider a request for a longer lease, the organisation must show good reason for such a request. This may include the need to satisfy conditions necessary to secure significant external funding e.g. Big Lottery funding. If this is the case the organisation must demonstrate that they are able to satisfy all other criteria of the awarding organisation.
- 5.9 The request for a longer lease should be supported by a detailed business plan that covers the proposed lease length and the organisation must demonstrate both the financial and administrative ability to take on a lease of that length. The property must not be situated where it is likely to be required at some future date as part of a scheme of comprehensive redevelopment. For the avoidance of doubt this is likely to mean any premises that form part only of a larger building (e.g. part of a block of flats) or are situated in possible key positions within a future comprehensive redevelopment scheme. It is proposed that organisations on a longer lease will not be eligible for the proposed community benefit rent reduction scheme as by definition the value of the rent reduction is likely to be substantial over the lease period and may therefore require the consent of the secretary of state. In addition, the benefit of a longer lease will allow the organisation to generate income to cover the rental costs.
- 5.10 Licences will primarily be used for hiring space in the new community hubs (see section 5.12 below). The fees for these will include the council's cost of holding, managing and administering the buildings. There will be a blended rate across the borough, smoothing out differences in the cost of property in different parts of the borough, which would otherwise make certain parts of the borough unaffordable for voluntary and community sector organisations.
- 5.11 In addition to diverse sizes/types of spaces having a different charge, the space will be priced for different uses based on whether it is for community groups, private events, or commercial use.

5.12 To summarise the main differences between a lease and a licence are:

Lease	Licence
Security of tenure for the term of the lease	Limited security of occupation
Exclusive possession	Does not give exclusive possession
A lease conveys an interest in the property	A licence only creates rights to use it
Lease is for a fixed period (Term)	Licence not necessarily for a fixed term
Lease (for more than 3 years) must be in writing	Licence may be created without formality

6. **REVIEW**

- 6.1 Since the Mayor's decision in December, officers have been carrying out visits to the identified community buildings. These visits have included meetings with the individuals who run the buildings, often the chair or secretary of the community group, examining leaflets and posters that advertise events and schedules. The information recorded from these visits has allowed the council to better understand the uses of the building, the activities that take place within them, and the utilisation rates of the building. They allow the council to make an assessment of the condition of the buildings as well as identifying any other issues that may be relevant.
- 6.2 Where it was not possible to arrange meetings in person with individuals, officers have tried to speak with representatives of occupying organisations to discuss types of use and hours of operation. The vast majority of occupiers have been spoken to either in person or by telephone.
- 6.3 Discussions have taken place with the tenant as to the nature and extent of the use, in order to allow the council to develop a picture of the types of use and utilisation levels across the portfolio. It has allowed an update of the rental value and an initial assessment of any major works that may be required.
- 6.4 The review has been the first comprehensive examination of the council's community buildings portfolio and the largest data gathering exercise of this kind that the council has ever undertaken; previous reviews of community buildings have taken a sample-based approach.

7. **MAPPING OF EXISTING PROVISION**

- 7.1 The map in Appendix 1 shows the current location of the existing 74 buildings in the portfolio.
- 7.2 The map clearly shows that the geographic spread of the existing buildings is uneven across the borough. The majority of these facilities are concentrated in Bethnal Green, Whitechapel and Stepney, with a narrow band of buildings in north Poplar (between Aspen Way and East India Dock Road). In contrast,

there is a clear lack of council-owned community facilities in Bow and on the Isle of Dogs.

- 7.3 However, while there may be a lack of council-owned community facilities in those areas, the map in Appendix 2 shows community facilities owned by housing providers and other third sector organisations and illustrates that while the council may not own facilities in those areas, they are still available.
- 7.4 While the council is keen to ensure there are community facilities throughout the borough, this does not necessarily require them to be owned and/or managed by the council. Where the council does not currently provide community facilities, the council will work with a range of providers (such as those included in Appendix 2) to try to ensure there are sufficient facilities across the borough – although these will not necessarily be run by the council.
- 7.5 The review has allowed the council to confirm that the 74 buildings have a cumulative total floor area of approximately 9,300m² (100,000ft²). The average (mean) size of a community building is 118m². This average figure masks an extremely wide range of sizes; the smallest community building is the Ramar House TRA, which is 16m², with the largest being the Osmani Centre at 863m².
- 7.6 There are significant, often hidden, costs associated with the council holding onto these buildings. The historic recording of the expenditure incurred means this is difficult to quantify at this stage. In 2015-16, there was expenditure of £550,000 on responsive repairs and maintenance. However, it is also known that a number of tenants are carrying out repairs themselves. In some cases, the quality of those works is not known.
- 7.7 It costs approximately £1,000-1,500 per building for statutory compliance certification. These are the statutory tests that are required to ensure a building is safe in relation to gas, electricity, asbestos, fire, emergency lighting, and water. Under existing tenancies-at-will, and in the absence of a clear delegation of responsibility to the tenant, the council is obliged to carry out these tests and ensure the safety and security of building occupants and users.
- 7.8 A number of these buildings are in poor condition, particularly in relation to their energy efficiency. The lack of formal agreement, and demarcation of responsibility, means it is often the council that pays the high energy costs for these buildings.
- 7.9 The council is working to update the condition surveys for each of the buildings in order to better understand the repairs and maintenance that could be required in the medium- to long-term. To bring these buildings up to a safe, secure and modern standard will, require significant capital investment. The capital investment required will need to be considered as part of the Council's Medium Term Financial Strategy, taking account of the outcomes based approach for prioritising resources.

7.10 There are costs associated with the management and administration of these buildings that need to be considered. This includes the staff that manage buildings including asset managers, facilities managers and other associated staff (e.g. finance officers who raise orders; compliance officers who manage the statutory compliance process). In many cases, there are uniform business rates liabilities that at present, the council ultimately pays.

8. UTILISATION OF COMMUNITY BUILDINGS

8.1 The other primary area that the review has been examining is utilisation rates. For the purpose of this review, it has been assumed that all buildings are available for use between 8am and 9pm, Monday to Friday and 9am to 3.30pm on Saturday. This allows a total of 71.5 hypothetical hours of use per property per week and a total of 5648.5 hours per week across the entire estate.

8.2 It should be borne in mind that some properties will have more restricted opening hours based on their planning permission, while others will have less restricted opening hours, allowing more than 71.5 hours.

8.3 A number of buildings will have multiple spaces – so while one part of the building may be in use for much of the week, it may be that other parts of the same building could be better utilised.

8.4 Based on the visits carried out and an assessment of the available evidence, the 74 buildings that form part of this estate are only utilised for 1862.5 hours per week, only 35% of the available hours. This averages out to 25 hours per week per property, out of a possible hypothetical 71.5 hours. This mean figure again masks a wide range of utilisation rates with the least utilised building being used for no more than 1-2 hours per month, while some of the most utilised buildings are used in excess of 50 hours per week.

8.5 The council's aim is to secure at least 60-70% utilisation across the community building portfolio. This ensures that the buildings are well utilised while allowing for some flexibility and churn time (e.g. for setting up before an activity and cleaning up after it). This drive to increase utilisation aims to see more, and a wider range of, voluntary and community groups having access to premises.

8.6 In order to reach that aim, the council is proposing to move to a hub/sharing model for the provision of community premises. This is set out in more detail in the section below but ultimately proposes that the council holds fewer buildings in the community buildings portfolio and instead creates hubs that offer high quality spaces at an affordable cost while also maximising use. This model will allow the council to identify opportunities for cross-subsidy.

8.7 The Council will need to consider the outcome of a number of other areas of the Council's business that are currently under review, in order to ascertain what economies of scale can be achieved and where there might be scope to

deliver services in a more efficient way. This includes the review of youth services, adults' services, and early years' services.

9. PROPOSALS AND CONSULTATION

- 9.1 The review, building on the principles agreed in December 2015, has led to three proposed outcomes:
- A significant investment in community hubs – multi-use, versatile, and affordable spaces for local voluntary and community groups;
 - To enter into leases with existing tenants who remain in their current building; and
 - Establishing a community benefit rent reduction scheme, in recognition of the community benefit provided by the tenant.
- 9.2 More details on each of these proposals are set out in the sections below.
- 9.3 In advance of bringing this report to Cabinet, the Council sought the views of existing tenants, the voluntary and community sector, service users and local residents. The Council carried out a public consultation exercise which started on 19 August 2016 and ended on 18 September 2016. Council officers held three drop-in consultation sessions across the borough, as well as events with the Tower Hamlets Council for Voluntary Services. The consultation was also promoted via the council's website and social media channels, as well as relevant publications and mailing lists.
- 9.4 Over 50 responses were received and the vast majority were supportive of the Council's proposals. More details on the proposals, and the responses to the specific questions, are set out below.

10 COMMUNITY HUBS

- 10.1 A community hub is intended to be a building that provides versatile, bookable spaces for voluntary and community sector organisations to use either on a regular, sessional basis or through an ad hoc booking/hire. The intention is to design them in such a way so as to allow multiple occupation and usage in high quality facilities that are proactively managed. This management will initially be provided by the council although in the future it may be appropriate to procure a social enterprise or voluntary sector partner to manage the hubs on the council's behalf.
- 10.2 As voluntary and community sector organisations will only be paying for the specific hours they need, these spaces will be more affordable than leases which, while providing the organisation with exclusive possession, will cost considerably more. Currently, if on a lease, the group is paying for occupancy whether it is using the space or not.
- 10.3 Instead, these spaces will be let on the basis of formal licence agreements (for regular use) or hire agreements for ad hoc use. This matches voluntary

and community sector organisations up with the spaces they need, solely for the time they require them, leading to a more affordable cost and a better used building.

- 10.4 In addition to use by community groups, these hubs will have spaces that will be able to host birthday parties, wedding receptions, engagement/mehndi parties, and other similar private functions. The income generated from these functions will help drive down the cost that will be charged to voluntary and community sector organisations, therefore making the space even more affordable.
- 10.5 The hub will not provide office space unless it is needed for and ancillary to the principle community activity. The council does and will continue to provide affordable office space in various locations throughout the borough for both community organisations and new business start-ups, however these will be separate to the community hub buildings.
- 10.6 As part of the consultation, people were asked what they thought of the proposal to establish community hubs, the vast majority of respondents said they supported the proposal (60% said strongly agree or tend to agree).
- 10.7 Ideally community hubs will include spaces that can be hired on an hourly basis (e.g. meeting rooms, community halls, activity space, board rooms) as well as spaces that can be rented on a longer-term basis (accommodation for local voluntary and community sector organisations that require a longer-term base). They will be equipped with free wi-fi where possible. There should also be secure lockable storage for organisations that might use the spaces on a regular basis.
- 10.8 Each community hub will be different, and will vary in response to local requirements and needs. Larger community hubs could accommodate a number of different activities at the same time, allowing for the possibility of different organisations delivering activities at the same time (e.g. in adjoining spaces).
- 10.9 Some hubs may have additional uses, in addition to community use. For example, some hubs may have community use during the day with the hub then used to deliver youth services in the evening.
- 10.10 It is hoped that hubs will encourage better interaction and networking between voluntary and community sector organisations to enable peer support and the sharing of knowledge and resources.
- 10.11 In terms of specific spaces within the hubs, there may be a large hall or meeting space, capable of hosting large meetings and conference style events as well as birthday parties and wedding receptions or similar functions. This may be accompanied by a small kitchenette or, where possible, a small catering kitchen.

- 10.12 There may be smaller meeting rooms (capable of accommodating 10-12 people) for meetings, training sessions, board/management committee meetings of local groups. These should have multimedia facilities, including internet access and the requisite IT equipment.
- 10.13 Smaller community hubs may only be able to accommodate some of these facilities. However each hub will be designed with existing local provision in mind – if there is a shortage of or demand for a particular type of space, then the council would seek to fill that gap. The design of the hub will have to reflect the constraints of individual buildings such as size and existing layout but will as far as possible reflect feedback from local users and those who took part in the consultation process.
- 10.14 In the consultation survey, respondents were asked what facilities they would like to see in community hubs. The most popular options were activity space followed by meeting rooms and catering space. These will be incorporated into the hubs where possible.
- 10.15 New and existing voluntary and community sector organisations are the key target users. This includes both those who need a longer-term base to deliver services to the public, and are prepared to enter into a licence arrangement, and also those who may wish to hire a hall or meeting space on an hourly basis – either ad hoc or as a regular booking. This might include TRAs or local clubs who only need to meet on a weekly or monthly basis.
- 10.16 When allocating space in a hub, the Council will give priority to existing tenants of community buildings that are poorly utilised and/or in poor condition.
- 10.17 When it comes to allocating bookable space in a community hub, local voluntary and community sector organisations will be prioritised over private functions and requests for bookings from private sector organisations. For local voluntary and community sector organisations, bookings it may be that priority is given to longer-term use over one-off bookings. However, consideration will be given to making space available for booking at different times to ensure a broad cross-section of groups are able to access the space for both regular and one-off events. For example, this may involve allowing some spaces to be booked up to three months in advance, while other spaces may only be available for booking up to two weeks in advance.
- 10.18 The Council will look at ensuring there is a hub within relatively short walking distance of most parts of the borough. They will mostly be in existing buildings. Examples for where the first hubs might be located include the Christian Street Community Centre, E1, and the community building on the St Andrew's development in Bromley-by-Bow. In addition, one of the outcomes of the Mayor's Somali Taskforce (the subject of a separate report on the agenda) is a proposal for Granby Hall to also become a community hub.
- 10.19 The Council is actively looking for other potential hub sites in the borough. This could be an existing building that would be converted to a hub or, in

limited cases, a development opportunity that will allow the delivery of a hub by either building one or securing one via the planning process in areas where existing options are limited.

10.20 Following the outcome of the consultation exercise and the consideration of this Cabinet report in November, the council will, with the support of THCVS, discuss with voluntary and community sector organisations already in a council building about how they might be able to use the new community hub in their area. Once these organisations have been accommodated, the additional spaces will be offered to other voluntary and community sector organisations that might be seeking premises from which to deliver services in the borough.

10.21 The charges for flexible spaces will be on an hourly basis and use a cost recovery model as a starting point; this means the Council will base charges to community groups on what it costs to run and manage the buildings. It may also be possible to offset additional costs by hiring rooms out to private organisations at a higher rate, therefore leading to a reduced hire charge for voluntary and community sector organisations. Based on charges by providers of similar facilities as well as some modelling work done by the council, it is anticipated that the average cost may be as follows:

Commercial Rate	Non-resident Rate	LBTH Resident Rate	Registered Charity Rate	LBTH Registered Charity Rate	Off Peak % discount Monday – Friday 9am – 5pm	Long term standard discount (booking in excess of 12 weeks)
£35 p/h	£25 p/h	£20 p/h	£15 p/h	£12.50 p/h	10%	20% discount

10.22 Based on these indicative figures, the lowest cost will be to a local voluntary or community sector organisation that has a regular booking during off peak hours, for which the charge would be £9 p/h. Please note that these are indicative figures only and may change once more detailed work has been carried out on the community buildings hub proposal. They will also vary based on the proportion of community versus commercial users making use of the building.

10.23 The Council does not have a fixed number of hubs it is looking to establish. Decisions on where hubs should be will be taken on the basis of local need, and in consultation with the voluntary and community sector; this will include consideration of all community facilities in the area, not just those owned by the Council.

10.24 The Council will look across the existing estate to identify the tenants who will move to these new community hubs. The Council will look to accommodate tenants currently in buildings with low levels of utilisation or in poor condition in a hub. This is not a policy to drive organisations providing valuable services

from their existing locations and is a process that will take place through dialogue and consultation. It is hoped that by moving groups to better planned, good quality accommodation, groups will be able to attract more users of the services that they offer. In all cases of groups moving from existing buildings to hubs, they will be in spaces that are affordable, of a higher quality and well managed.

- 10.25 Where there is no suitable hub in the locality, the council may propose a lease instead, until such time as there is a hub in the area. More information on the leasing proposals is set out below. The next section also sets out the process that will be followed when properties become vacant as existing tenants move to community hubs.
- 10.26 One of the first buildings identified for use as a community hub is the council-owned community centre on Christian Street, E1. The building is a purpose-built community facility and is currently vacant. It has two large floors, of mostly open plan space as well as a number of smaller offices/meetings rooms/consultation rooms; the building has a small catering kitchen as well as a lift.
- 10.27 The council has commissioned some feasibility work to look at how the building might be adapted to become a community hub and once finalised these will be available to view on the council's web site.
- 10.28 The London Borough of Islington has been using the hub model for a number of years now. Octopus is a network of multi-purpose centres throughout the borough and is 'driven by the collective desire to develop centres as 'hubs' in the community, where multiple grass-roots services and wide-ranging facilities can be accessed and influenced by the unique needs of a diverse population and local neighbourhoods'¹.
- 10.29 There are currently 11 community hubs in the Islington network, which provide a range of services, from multiple providers from within the voluntary and community sector. They also make their spaces available for private hire to both individuals and organisations.
- 10.30 As part of the consultation exercise, a number of questions were asked about the proposed community hubs.

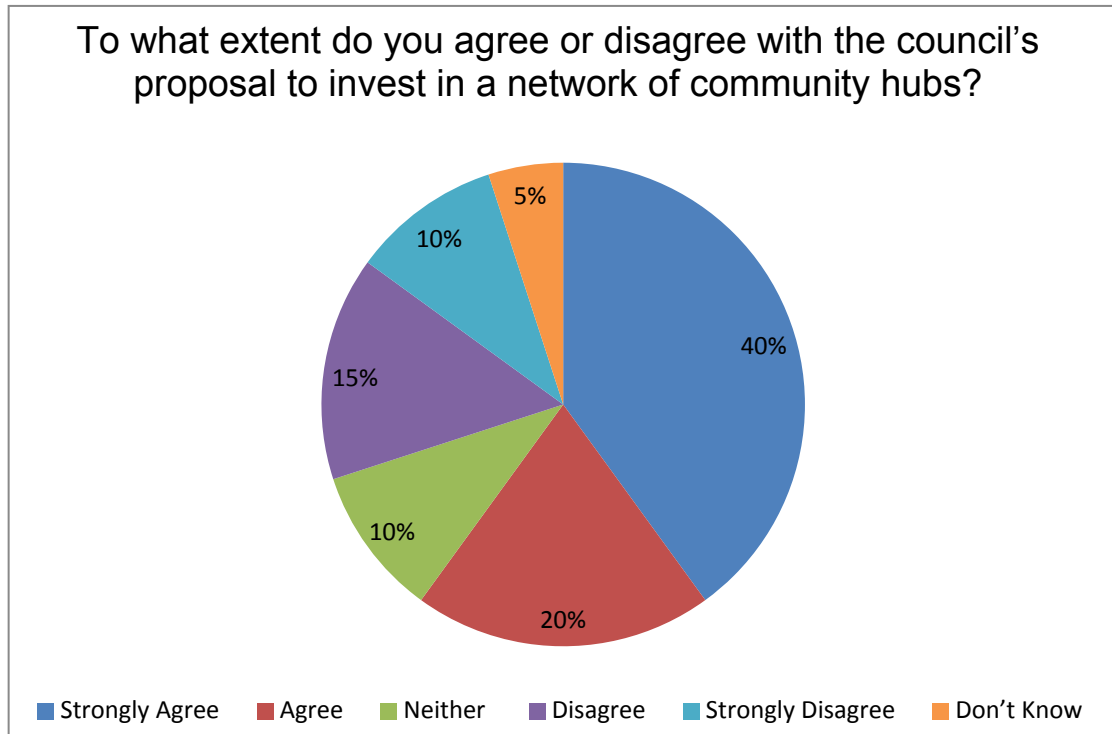
11 CONSULTATION FINDINGS

- 11.1 The questions asked were:
- Whether people supported the council's proposals to invest in a network of community hubs;
 - What facilities were important to include in a community hub;
 - How far away people thought users of the hubs could have to walk to access their nearest hub;

¹ <http://www.octopuscommunities.org.uk/what-we-do/>

- What people thought of a proposal for the hubs to be managed by a community and voluntary sector group in the future.

11.2 60% of people were in favour of the proposals (strongly agreed or tended to agree) to investment in a network of community hubs.



11.3 Some of the general comments received on this question made reference to there being a need to ensure value for money with council resources, others highlighted that a shared pool of buildings was a sensible idea, with others commenting that robust management and equitable usage was critical.

11.4 Respondents were asked to indicate what facilities they thought these community hubs should have. Respondents were asked to select their top three from a list. The three facilities people felt were most needed were:

- Activity Space
- Office Space
- Meeting Rooms

11.5 It was clear that these were considered to be important facilities for a successful community hub. In addition, respondents told the council that catering facilities and facilities to contact the Council or other services were also important. By and large residents thought that spaces to rent on an hourly basis (whether for activities, office space or meetings rooms were more useful by the hour than on a longer term basis). A key issue mentioned related to the opening hours of community hubs, particularly in ensuring that consideration is given to their opening outside of working hours to encourage a wide range of activities, in particular child care groups.

- 11.6 Another question that was asked was how far (in time taken to walk there) people thought was a reasonable amount of time for residents and service users to travel to their nearest community hub. There was a mixed response to this question, with the most popular option being 20-30mins (25%) and the second most popular one being 15-20mins (23%). One comment centred on the spread of community hubs needing to be even across the borough, as in some cases (for example elderly drop in sessions), it is critical to ensure close proximity to residents.
- 11.7 Community hubs will initially be managed directly by the Council, but in the future it may be appropriate for a voluntary or community sector organisation to manage them on the Council's behalf. The consultation asked what people thought of this and there were mixed results; while 34% supported the idea of a community or voluntary group managing the buildings as they felt this would be better value for money and their needs would be better understood and met. However, 45% of respondents did not support this proposal. These respondents highlighted concerns that if a building were managed by a third-party, there was the possibility of favouritism or other similar unfair practices creeping in. To this end the involvement of community organisations in a lettings and allocation policy for community hubs could prove useful. Furthermore, the transfer of a community hub to a consortium body (rather than one sole organisation) may deliver economies of scale regarding management, as well as secure an objective approach to what services/activities are delivered.
- 11.8 The Council will review how it provides and manages these hubs 18-24 months after they have been established. This will allow an assessment to be made of the Council's management of the hubs and a further decision to be made on whether or not the council should seek a voluntary or community organisation to manage the buildings on the council's behalf. Existing tenants, users and the wider voluntary or community sector will be consulted on any proposal at the appropriate juncture.

12 THE REMAINDER OF THE COUNCIL'S COMMUNITY BUILDINGS ESTATE

- 12.1 It is envisaged that a number of existing community building occupiers will move to a hub. However, there will be some exceptions to this. This section sets out the proposals around some of those exceptions. This section also sets out the proposals in relation to the future use of those buildings that become vacant, the occupiers having relocated to a hub.

Existing leases

- 12.2 A number of voluntary and community sector organisations are on existing leases, based on a community rent. There is currently no proposal to change these arrangements, not least because the tenants have security of tenure for the duration of the lease (except where there are break provisions). When those leases come to an end, the Council will determine the most appropriate

way forward – offer the tenant space in an existing hub, propose a renewal of the lease, remarket the property or review the future use of the property.

New leases

- 12.3 For some existing users of community buildings, who are currently in an unsecure tenancy-at-will, the Council will move them to a lease with a community rent. This will only be proposed when the council is satisfied that the building is well used, and that intensive use is likely to be the case in the coming years. The building will also have to be in relatively good condition and not require significant capital investment on the council's part. There may be some classes of use for which a lease, specifically security of tenure and exclusive possession, is necessary, such as an OFSTED-registered nursery.
- 12.4 These leases will be based on the principle set out in section 5.3. Namely a 3 to 5 year term, based on the community rent, excluded from sections 24 to 28 of the Landlord and Tenant Act 1954, with a service charge to cover some additional costs such as insurance and some repair.
- 12.5 In very limited circumstances, the council may issue leases on the above basis but with a peppercorn rent instead. This option will only be made available to THH-recognised TRAs, for meeting their statutory obligations, who occupy a well-used building that is in good condition. In such case, the lease would still be for 3- to 5-year term, excluded from sections 24 to 28 of the Landlord and Tenant Act 1954, with a service charge to cover some additional costs such as insurance and some repairs but no rent would be charged. However, the tenant would be expected to hire out the facilities in order to raise income and allow other voluntary and community sector organisations to use the space.
- 12.6 As part of this process, the council will work to Tower Hamlets Homes to validate the status of existing TRAs who currently use council-owned buildings. This will include ensuring:
- The organisation has a constitution that has been agreed with Tower Hamlets Homes and sets out their aims and objectives as well as a clearly defined geographic boundary ('their area') for the organisation;
 - the primary aim of the organisation is to represent the views, concerns and interests of residents within their area on housing related issues;
 - ensuring membership includes all residents over the age of 16 within their area and all potential members are invited to general meetings;
 - ensuring attendance at meeting is monitored to ensure successful representation of all (potential) members within their area;
 - the organisation must adopt and demonstrate commitment to the Tower Hamlets Homes Equal Opportunities Policy; and
 - ensuring clear and accurate financial records are maintained and robust financial systems are in place.
- 12.7 As part of the consultation, people were asked what they thought of the proposal to offer leases to tenants if they are to stay in their existing building. 68% of respondents said they **agreed** with the proposal. Some of the

comments received stated that formal agreements should be in place, with leases being offered to those organisations that can evidence they can meet the costs. There was broad support of the move towards leases of 3-5 years offering greater security for voluntary and community sector organisations.

- 12.8 While there was broad support for the move towards leases some responses centred on key considerations which might need to be considered prior to this transition. These centred on the production of a clear and transparent policy around the calculation and billing of service charges, the agreement of stock condition prior to leases being entered into, and the lease containing clear delineation of responsibilities for repair / maintenance which needed to be undertaken thereafter.
- 12.9 Some responses also noted that the council may wish to consider some conditions which would allow legitimate trading for community organisations which also occupy D1 premises (and are thus applicable for community benefit rent reduction). These responses noted that despite receiving reduced rent, restrictions on trading could undermine financial viability of the community organisation to deliver community outcomes. However, the council is unable to support this suggestion as it would require a different, and more expensive, rent calculation (as it would no longer be a D1 use) as well as requiring changes to planning permission. Most importantly, this could result in sites (or parts thereof) no longer being in community use, causing much-needed space to be lost.

Former homes

- 12.10 A significant number of community groups, particularly TRAs, operate out of properties that were once homes. As part of this piece of work, it is proposed that most of those properties are converted back to dwellings and either used as temporary accommodation for the growing number of homeless households in the borough or let to a household on the council's housing register. Existing users of these buildings would be relocated to a hub.
- 12.11 Each building that is converted back into a dwelling would provide much needed housing for residents on the council's waiting list. The average cost of providing a new council home is c. £300,000. These buildings could be converted back into homes at a fraction of that cost, resulting in notional savings in the region of 50% of the above cost, while also contributing to the Mayor's priority for delivering new, genuinely affordable, social housing for local residents.

Review for other uses

- 12.12 As part of the process of determining which groups should move to hubs, the council will consider alternative uses for the site. One of the key areas that the council has been focussing on recently is the provision of early years' provision for two-year-olds, which is a statutory obligation for the Council. Current demand exceeds provision and the Council's Early Years team are keen to see an increase in affordable provision across the borough.

Community buildings that become vacant as a result of the move to hubs, that are suitable for that use, could be marketed to seek a provider.

Community Asset Transfer

- 12.13 The December 2015 report stated that the council had not discounted Community Asset Transfer. While this remains the case, it is not an option being recommended by officers due to the poor condition of many of our existing community buildings. In such a situation, any transfer would ultimately be a transfer of liabilities rather than an asset.

Partner Asset Transfer

- 12.14 There are some anomalous cases of community buildings being retained by the Council when stock transfer has taken place and an estate has been transferred to a Registered Provider. In such cases, the council will consider transferring the building to the Registered Provider (for the appropriate consideration) in order to allow them to take a more holistic view as to the provision on the estates they manage.

Redevelopment potential

- 12.15 In some cases, the site of existing community buildings may provide opportunity for development, either as small infill schemes or as part of a more comprehensive estate-wide regeneration scheme. In such cases, the Council will put in place an engagement process which gives at least six months' notice as well as assisting in the identification of alternative premises.

Disposal option

- 12.16 In some cases, the Council may choose to dispose of a site. This may be because the cost of retaining and refurbishing the site for alternative use is prohibitively high. However, this is unlikely to be pursued as an option where the community building forms an integral part of the estate, as this would then fetter the Council's options when seeking to make improvements or otherwise regenerate the estate.
- 12.17 The options appraisal for other uses or disposal will be determined following a service and asset review being undertaken, and will be in accordance with the Council's Capital Strategy.

13 COMMUNITY BENEFIT RENT REDUCTION

Community Benefit

- 13.1 The Council recognises that the Voluntary and Community Sector (VCS) is a valuable and important asset that delivers vital services and benefits to local residents. The council is committed to ensuring this community value is appropriately recognised and reflected. The Council also recognises that local

organisations are often best placed to manage facilities within their local communities. Their local knowledge, extensive use of volunteers and hands on management of the asset can result in better services which meet the needs of the wider community, lower overheads and offer better value-for-money. Further, recognising that actively investing in the VCS often represents good value for the public purse and helps the Council achieve its social, economic and environmental outcomes as set out in the Community and Strategic Plans.

- 13.2 The Council is proposing to offer, through a consistent, transparent, and accountable process, some voluntary and community groups, a community benefit rent reduction where they meet specified criteria. This is consistent with the findings of the Community Buildings consultation where the majority (81%) of those who responded stated that they strongly agree or tend to agree with the Council offering VCS organisations the opportunity to apply for a rent reduction associated with a 3-5 year lease in certain circumstances.
- 13.3 In line with the principles of the VCS Strategy, the Council was keen to co-produce the criteria and process for a Community Benefit rent reduction with the VCS. The consultation also found that 87% strongly agree or tend to agree that the council should work with the VCS to co-produce the policy, criteria and process. In setting the criteria for the community benefit rent reduction, the council has used responses from the Community Buildings consultation and the findings from a joint working group that was established for this purpose.
- 13.4 The working group consisted of council officers, Tower Hamlets CVS, Tower Hamlets Homes and representatives from the Premises Forum. The group was co-chaired by the Corporate Director of Resources and Chief Executive of Tower Hamlets VCS and was facilitated by a jointly appointed independent consultant. The key aim of the working group was to discuss and agree the policy and eligibility criteria for rent reduction, the application and assessment processes, the monitoring and reporting arrangements, the support to organisations and the implementation plan, so that the governance and decision making arrangements are robust and transparent and in line with recognised best practice.

Criteria for Community Benefit Rent Reduction

- 13.5 Of those surveyed, 97% strongly agreed or tended to agree with the Council having a formal policy, criteria and process for considering applications for a rent reduction. Respondents were asked to indicate what they felt the criteria should include. The most common responses included the following which will form part of the criteria:
- Properly constituted as non-profit distributing with social/charitable objects with an area of benefit that covers all or part of Tower Hamlets
 - Willing to offer space and support to other smaller local groups
 - Able to demonstrate that it is community-led

13.6 As part of the open questions within the survey, respondents felt the following were also important and should be considered as part of any criteria for rent reduction:

- The criteria should include a question on equalities and ensuring the building was open to all communities and in particular being *'able to demonstrate its management board is inclusive and representative of the local area and be able to demonstrate diversity among community user groups'*.
- The process for awarding a reduction should be fair, open and transparent and that *'the Council should publicise the levels of subsidy each group gets in reduced rent in the same way as grants etc.'*
- The criteria should also state that an organisation that is awarded a reduction in rent should *'operate in an open and transparent way not being selective and isolated in their behaviour'*.

13.7 The result showed that 94% strongly agree or tend to agree that the organisation should expect to demonstrate that it has met the criteria for the duration of the lease period. In addition to this the VCS representatives of the Working Group proposed that if the standards for a Community Benefit rent reduction are met then the reduction should be applied directly in the lease as the amount payable in rent for that premises, to ensure clarity, transparency and co-terminosity with the lease period. The proposal made was that the lease should show details of how this final rent payable was arrived at, citing both the community rent for D1 usage calculated for that building, the Community Benefit rent reduction and the reduced rent payable. The lease would also make clear that the rent reduction would continue to apply for the period that the organisation continued to meet the Community Benefit rent reduction criteria. The Council has considered the proposal and whilst there is a relationship between the rent payable and the community benefit rent reduction awarded, the Council is keen to ensure there is sufficient separation between the Council's role as a landlord and the support provided by the Council to VCS organisations awarded a community benefit rent reduction. The lease will therefore set out the community rent amount and there will be a separate agreement setting out the community benefit rent reduction. The rent reduction will be set out in invoice details for the rent payable by the VCS organisation.

13.8 Detailed below are the criteria required to be eligible for a community benefit rent reduction. This includes details of how the criteria will be tested.

Eligibility Criteria for Community Benefit Reduction	How tested
<p>In addition to meeting the criteria for being able to apply for a lease at a 'D1 Community Rent', the lessee should be able to demonstrate that they are:</p> <ul style="list-style-type: none"> • Community-led (i.e. its proposed/existing governance arrangements must demonstrate that 	<p>Stage 1: Initial light-touch Expression of Interest by the community group.</p> <p>Stage 2: Testing the skills, knowledge and capacity to run the building safely and legally. An</p>

<p>it has strong links with the local community, and that members of the community are able to influence its operation and decision-making processes);</p> <ul style="list-style-type: none"> • Appropriately constituted and capable of demonstrating good governance through open and accountable processes, with adequate monitoring, evaluation and financial management systems; • Capable of sustainably, legally, and safely managing an asset and delivering services from it. • Capable of demonstrating the social, economic, and environmental benefits they deliver through their activities and that these clearly link to the council's own desired outcome for the borough as expressed in the Community Plan. • Able to demonstrate how they will embrace diversity, work to improve community cohesion and reduce inequalities. • Willing to offer space and support to other smaller local groups • Demonstrate how the organisation contributes to the Voluntary and Community Sector Strategy Action Plan. • Agree to the principles of the Tower Hamlets Compact. 	<p>independently assessed legal compliance tool <i>pre</i>VISIBLE will be used to test the following:.</p> <p>Testing the business case with a satisfactory and proportionate (to the scale and type of organisation) business plan that demonstrates an evidenced ability to manage the building sustainably over the term of the lease. The business case will need to demonstrate:</p> <ul style="list-style-type: none"> • How it engages with the community it serves and seeks feedback on its activities in order to inform strategic planning of new services and changes/improvements to current services. • Clear evidence of embracing diversity and promoting community cohesion having regard to the council's Toolkit on Community Cohesion. • Clear evidence that the asset will be used efficiently and intensively. <p>Testing the social, economic, and environmental value by demonstrating that its activities and use of the building will deliver clear and evidenced social, economic, and environmental benefits in line with the Corporate Objectives ('core themes') in the council's 2015 Community Plan.</p> <p>For organisations where their potential 'Community Benefit rent reduction' would be equal to or less than £20k per annum the simple table set out in Appendix 3 will be used which links social/charitable objects to actual activity to council objectives.</p> <p>For organisations where their potential 'Community Benefit' would be greater than £20k per annum more detail will be required and an external tool will be used. The <i>Your Value</i> tool would be used for this purpose.</p>
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13.9 The VCS representatives on the Working Group proposed that the rent reduction should be available to all organisations who meet the eligibility criteria and standards and rent premises from the Council on short leases of up to 5 years regardless of whether a lease is already in place or not. It was noted that there are organisations with longer-term leases already in place, the VCS representatives of the Working Group suggested that if the council did not consider it appropriate to offer a rent reduction for longer than a five year period, those with longer term leases could be eligible to apply for the rent reduction on the basis that it would need to reapply at the end of each five year period. The position regarding longer term leases is set out in paragraph 5.9, which highlights the Council's requirement to comply with legislation in terms of leases and disposals.

- 13.10 The survey asked of any other approaches that could be used to award rent reductions, there was a strong emphasis on organisations being able to show 'clear demonstrable impact for the local community' and being 'able to show what and how they have benefited their community to receive rent discounts'. Both of these are acknowledged in the criteria.
- 13.11 The survey suggests that 84% strongly agree or tend to agree that there should be a standard rent reduction if the agreed criteria are met by an applicant. This is consistent with the Working Group who also felt that a standard reduction should be agreed. The December 2015 Cabinet report Community Buildings: Allocation and Charging Policy stated that the charges that are to be applied to community buildings should not be income generating, on that basis Tower Hamlets Council for Voluntary Services and the Premises Forum proposed that the rent to be reduced should be a substantial amount - at the same time recognising that organisations must pay some contribution in rent. The proposal made was for the level for charitable rate relief of 80% set by the government to be used as the level of rent reduction for eligible organisations. This was proposed on the basis that it would recognise the community benefit achieved by the organisation as well as recognising that the 20% paid by the organisation would acknowledge the administrative and overhead costs incurred by the council in the provision of community buildings.
- 13.12 The table below sets out the amount in rent that voluntary and community sector organisations are currently paying, how much they would pay as market rent that reflects D1 community usage and also how much they would pay if the rent reduction was set at the proposed 80%. These figures are based on the borough's current average D1-use rent of £14.50 per square foot or the rental figure if rent is currently paid for a D1-use. The community benefit calculation excludes nurseries and playgroups and TRAs and other excluded categories from the proposed community buildings rent reduction policy such as long leases, short-term leases for meanwhile use as well as ground rents. This analysis shows that the implementation of the policy would result in the council foregoing £335k in income as support to voluntary and community sector organisations in addition to the £550k expenditure on responsive repairs and maintenance referred to in paragraph 7.5. It should be noted that these are indicative figures and the application and assessment process may yield a different outcome.

Voluntary and Community Sector Organisations	Amount
Current rent per annum (based on existing leases)	£301,250
Total potential rental payments for D1 community usage for whole portfolio	£830,285
Potential payments after implementation of policy	
Rental payments with 80% reduction in rent (where eligible)	£79,739
Rental payments with 0% reduction in rent (where current use or lease makes ineligible)	£414,833
Total rental payments after implementation of policy	£494,572
Total rental reduction after implementation of policy	£335,713

Exclusions to Community Benefit Rent Reduction

13.13 There are some exceptions to those that will be eligible for the rent reduction and these are detailed below:

- Where the Council enters into a lease based on a peppercorn rent (e.g. £1 a year) with Tenants and Residents Associations (TRAs) who are recognised by Tower Hamlets Homes, the Council's housing arms-length management organisation, subject to meeting the relevant criteria. The community building must form part of the Housing Revenue Account, be well used and in good condition.
- As detailed in the 1st December 2015 Cabinet report Community Buildings: Allocation and Charging Policy, nurseries/playgroups and places of worship will attract the community rent as described in paragraph 5.5.
- Organisations who are considered to be engaged in economic activity for the purposes of the State Aid rules.
- While some feedback was received through the consultation process and from the working group concerning further consideration of this policy, the community benefit rent reduction policy will not include an allowance for parts of the building that are available for use by other members of the community or general community use, as this will be complex and resource intensive to administer and monitor.
- The Council remains committed to ensuring that there are sufficient high quality childcare places across the borough and will continue to work with and support private and voluntary childcare organisations, including nurseries and playgroups. The Council's Integrated Early Years' Service provides a range of support and is developing options that will include support for those nurseries and playgroups affected by the Council's Community Buildings policy.
- Faith-based organisations, not occupying a place of worship and providing general community use, will be eligible to apply for the community benefit rent reduction.
- Those organisations in receipt of a Council grant or contract where the rent for their premises is already included in the scope of that grant or contract for the whole duration of the lease.
- Those organisations who are not on the standard community lease, the principals terms of which are described in paragraph 5.3. This includes organisations on leases of less than 3 years (e.g. meanwhile uses) and those on longer leases (in excess of 5 years). This also includes organisations that only pay a ground rent.

Process for Community Benefit Rent Reduction

13.14 It is critical that the council has a process that is open, transparent and robust. This is echoed in the survey findings where respondents have stated that they would like to see a process which is 'fair, open and transparent'. The process for assessing the Community Benefit rent reduction was discussed by the Working Group.

- 13.15 In order to ensure that the process is open, transparent and robust the process for offering a reduction in rent will consist of the use of external independent assessments tools and assessors that are considered to be good practice and are already used effectively elsewhere. When testing whether an applicant has met the standards required for a rent reduction the council will use an independently assessed legal compliance tool, *pre*VISIBLE. This tool is endorsed by the Cabinet Office, recognised by the Charity Commission and used by other London Boroughs such as Hackney and Haringey². The independent national assessors test the management systems, policies and procedures that an organisation has in place via a series of online questions and requests to attach specific pieces of supporting evidence. *pre*VISIBLE also includes advice and guidance and looks at whether an organisation is fit for purpose and legally compliant. The *pre*VISIBLE is available at no cost to use for the assessment preparation, with a fee of £500 for the independent assessment.
- 13.16 The Council will also ensure that the process and requirements are proportionate, so will have a threshold above £20k per annum for which a more detailed assessment will be required. An external tool, the Your Value! tool, is accepted good practice and will be used as part of the assessment. This is a self-assessment tool which includes a series of prompt questions to assess an organisations impact of social value. In particular the tool explores the social, economic and environmental impact of an organisation. The tool has been tested, with positive feedback, in various parts of the country including Hampshire, Oxford and Surrey before being launched online. The cost for the your Value account is £100, with discounts available for a block purchase of multiple accounts. Both the *pre*VISIBLE and Your Value! Tools were used in tandem by Haringey Council as the mechanism for assessing all 25 organisations they rent buildings to in the course of lease renewals in 2014/15.
- 13.17 As part of the assessment process, organisations will be required to complete these tools. Support will be provided to organisations through Tower Hamlets Council for Voluntary Services with training from the organisations who deliver the two tools.
- 13.18 In order to promote and increase transparency and accountability, the Council will establish an assessment panel which will comprise the Head of Benefits, the Head of Revenues, (the Panel Chair and Head of the team responsible for assessing charitable rate relief), and a representative of the Council for Voluntary Services. The panel will receive a report from the independent assessors that will set out the results of the *pre*VISIBLE and Your Value! tools against the eligibility criteria. The assessment panel will review the report and determine whether the community benefit rent reduction should be awarded. It is proposed that the mechanism for considering the recommendation of the assessment panel will be via the Grants Decision Making meeting, with a formal report presented to the GDM meeting for

² <http://www.haringey.gov.uk/community/voluntary-sector/council-community-buildings/self-assessment-community-building-tenants>

consideration, setting out the reasons for the recommendations, supported by the independent assessor's report. An appeals process will be in place for organisations that are unsuccessful with their application. It is proposed that this would be similar to the appeals process for charitable rate relief, whereby appeals are presented to the Monitoring Officer and S151 officer for consideration. A high level process and flow chart for administering the rent reduction is set out in Appendix 4 and also details the governance arrangements for decision making.

On-going monitoring and reporting requirements for groups awarded a community benefit rent reduction

- 13.19 The on-going eligibility for the community benefit rent reduction will be reviewed annually for the duration of the lease to ensure financial good governance; sustainability and delivery of community value are present throughout the duration of the rent reduction period. The Revenues Team currently review eligibility for charitable rate relief on an annual basis. It is proposed that they also undertake the review for community benefit rent reduction as the reviewing infrastructure and resource is already in place and ensures a separation of the support and monitoring functions. The review includes site visits as well as analysis of Annual Reports and Accounts for organisations in receipt of the rent reduction. Annual reports will need to be produced in a timely fashion after the end of the organisation's financial year and will need to contain a section on how they have delivered their Public Benefit, giving clear details on activities undertaken throughout the year and how these are related to the social/charitable objects of the organisation and the Council's strategic priorities.
- 13.20 In addition to the annual review, and to ensure that there are robust procedures in place for monitoring, the Council's internal audit function will undertake an annual compliance audit to audit the application of the community benefit rent reduction policy.
- 13.21 If, following the review or compliance audit, an organisation is no longer providing the community benefit for which the rent reduction had been awarded, the organisation will no longer receive the rent reduction and will be required to pay the community rent. If the organisation subsequently considers that it is providing a community benefit, it will need to reapply for the rent reduction.
- 13.22 In order to set out clearly the community benefit being achieved by the organisation, the VCS representatives on the Working Group proposed that a Schedule be included in the lease that sets out the on-going performance and monitoring requirements the groups must meet to keep their Community Benefit rent reduction. Failure to comply with these on-going requirements or failure to continue to demonstrate the community benefit would result in the council withdrawing the Community Benefit rent reduction for the remainder of the lease term. The Council would determine whether the group remains and pays the full rent or that the lease is terminated. Groups would have a break

clause in the lease that would enable them to surrender the lease if they were unable to pay the community rent. In addition to this the lease will also have a break-clause available to organisations if they are unable to pay the reduction in rent as a result of a change in their circumstances.

- 13.23 The schedule will include clear details of when the organisation will be required to submit monitoring and performance information. In particular this will include:

Amount of rent reduction per annum	Monitoring / performance information required
Rent Reduction greater than £20,000	On a 6-monthly basis for the duration of the lease agreement
Rent reduction less than £20,000	On an annual basis for the duration of the lease agreement

- 13.24 For organisations with a reduction of greater than £20,000 per annum, a report will need to be submitted every 6 months detailing how they continue to meet the standards for the reduction. On an annual basis this will include submission of their accounts and Annual Reports. For those with a reduction of less than £20,000 a report together with accounts and annual report are to be submitted on an annual basis.

- 13.25 The Council will ensure that there is a clear agreement setting out the on-going performance and monitoring requirements the organisations must meet to keep their Community Benefit rent reduction. However, it is proposed that this will be in a separate agreement as set out in paragraph 13.7.

14 CONCLUSIONS

- 14.1 The review of the community buildings estate undertaken between December 2015 and July 2016 has revealed a number of issues that make the estate and the current basis of occupation and management to be unfit for purpose.
- 14.2 In particular many of the buildings are grossly underutilised. They are assets that should be available for the whole of the community and for a variety different users. Instead they are often used for only a small number of hours each week by a limited number of users often comprising only one interest group.
- 14.3 There is no formal basis of occupation in all but a small number of cases. This leads to confusion as to the allocation of landlord and tenant responsibilities and no security of occupation for the tenant.
- 14.4 The lack of a uniform system of charging for buildings means that some groups are already paying community rent for their premises whilst others pay nothing. This leads to significant inequality across the estate.

- 14.5 Finally, many of the premises have not been maintained over the years. This in part stems from the reasons stated above but regardless of the reasons, the cost of bringing the estate into repair will be significant. With intense pressure on all councils to make savings, the council must reduce the number of buildings within the estate and ensure that those that remain are more intensively utilised.

15 RECOMMENDATION PROPOSALS

- 15.1 In conjunction with the consultation feedback received, and as iterated at the start of this document, this report makes the following implementation proposals:
- 15.2 That a network of community hub buildings as described in the report be established throughout the Borough in order to best serve local communities with good quality, relatively inexpensive accommodation that is fit for purpose and available in the size required and at the times needed.
- 15.3 That where community groups are unable to utilise hubs and the council agree to allow them to remain in existing accommodation that this occupation will be on the basis of a formal lease.
- 15.4 That a community benefit rent reduction policy is introduced to provide funding to reduce some or all of the rental / licence charges in respect of the new arrangements.
- 15.5 That where vacant property is released as a result of the move to hubs, then this will be considered as part of the Council's asset and capital strategies, including consideration of conversion to meet other Council priorities, including provision of affordable housing for families and homeless people or the provision of nursery places for 2 -5 year old children.
- 15.6 There will be a cost to establish and manage the hubs, from both a capital and revenue perspective. These costs will need to be considered as part of the Council's Medium Term Financial Strategy.

16 IMPLEMENTATION PROPOSALS

- 16.1 This will not be an overnight process. It will be a resource intensive process for both the Council and the voluntary and community sector. It is estimated that the process will begin in early 2017 and will take up to 2 years to complete.
- 16.2 The Council will make an immediate start on moving those organisations which will be on community rents with no community benefit rent reduction (e.g. nurseries or places of worship) onto leases with the standard terms set out earlier in this report. This will require the issuing of Heads of Terms,

following by subsequently issuing and then entering into the leases. It is hoped that this first tranche of leases will be completed by July 2017.

- 16.3 While this work is taking place, officers will continue with the work to establish the hubs and start identifying the tenants who will be moving from existing buildings to the hubs. It is envisaged that the first hub will be ready for use by July 2017. In the run up to this, discussions will take place with the identified tenants to explain what will happen and how the hubs will operate. This time will also be used to enter into the licence agreements for regular use of the hubs as well as establish internal procedures for the day-to-day management of the hubs.
- 16.4 The remaining groups will be dealt with on an area by area basis largely following the implementation and availability of hub buildings. E.g. the first tranche of existing tenants will be those who are currently accommodated in the vicinity of the Christian Street hub. This will include organisations who move into the hubs as well as those who are going to be offered the opportunity to enter into a lease.
- 16.5 The next phase will be a review of existing and newly vacant buildings (where tenants have moved to a hub). The review will be informed by and in accordance with the Council's Asset and Capital strategies. Where appropriate these will be converted to provide residential accommodation in accordance with the recommendations of the review. Where buildings are not suitable for conversion, they will be marketed in accordance with the council's adopted procedure for disposals and lettings policy. This will take 6-24 months to cover the entirety of the estate and carry out the work in a manageable way within resource constraints.
- 16.6 All of these stages will involve discussions with individual groups involving representatives from Asset Management and Third Sector Team and, where necessary, THCVS. Other service departments will also be involved (e.g. Early Years Service in the case of nurseries) where there is a need for specialist advice. It will also require legal resource to prepare and complete the lease documentation.
- 16.7 The transition from paying a limited contribution for their building to paying a community rent will not be straightforward for many of these organisations and it may be necessary for a phased introduction of the charges which will be considered in consultation with the relevant service who will also be able to offer business planning advice and mentoring to minimise the impact of the introduction of charges. This will be supplemented by support from THVCS that will be funded by the Council as part of the THCVS infrastructure support contract.
- 16.8 In order to facilitate the process resource will need to be identified in the following areas:
 - Asset Management;
 - Facilities Management;
 - Capital Delivery;

- Legal Services;
- Early Year's Service (For nurseries/playgroups only); and
- Third Sector Team.

16.9 It will also be necessary to set up an appeals mechanism for anyone who feels that they have been unfairly treated by the move to the new basis of occupation.

Implementation of the Community Benefit Rent Reduction

16.10 The council will consider the resource implications of implementing the Community Benefit rent reduction to ensure organisations are supported through the process with support provided by the Council and Tower Hamlets Council for Voluntary Services. It is considered likely that some organisations based in council buildings will require development support in order for them to meet the eligibility criteria and standards for a reduction in rent and this support will need to be provided in advance of the lease arrangements being finalised. It is proposed that each organisation will have a named officer from the third sector team for support, working with the CVS, for the duration of the implementation to ensure continuity and a single point of contact from the Council.

16.11 For those groups who go onto a 3 to 5 year lease, the Council, working with the CVS, will set out a clear and agreed timetable for going through the independent assessment process for the community benefit rent reduction scheme. For some organisations this will be relatively straightforward and may only take up to 3 months to complete. Other organisations will require far more support and guidance to take the necessary action to meet the eligibility criteria for the community benefit rent reduction. The timetable for each organisation will be agreed, formalised and regularly monitored to ensure the organisation has sufficient time and support to meet the criteria, but based on the independent assessment there will be a time limit within which this will need to happen to minimise any avoidable delay or drift in the process.

17 COMMENTS OF THE CHIEF FINANCE OFFICER

17.1 Following initial consideration by the Mayor in Cabinet in December 2015, this report updates Members on the results of the consultation process that has taken place in respect of the use of community buildings and outlines various proposals for the future operation of these assets. It introduces an allocation and charging policy that will be in line with the Council's Capital Strategy and complements the council's Asset Strategy and Corporate Landlord model, and which should enable assets to be used more efficiently.

17.2 The report recommends that community buildings that are well used will be retained but that alternative accommodation should also be made available to smaller community groups through a network of local hubs. This consolidation will provide an opportunity for under-utilised buildings to be considered as part of the Council's Capital Strategy, which forms part of the Medium Term

Financial Strategy. These buildings may be used for alternative purposes or designated for disposal in order to generate capital receipts. Alternatively there is an option for the assets to be used for redevelopment, including the provision of social housing.

- 17.3 The report highlights the current state of disrepair of some of the assets which will require significant capital investment. The capital investment required will need to be considered as part of the Council's Medium Term Financial Strategy, taking account of the outcomes based approach for prioritising resources. Whilst it is also clear that the cost of maintaining and repairing the building may not be covered by the proposed approach and in particular the community benefit rent reduction, it is likely that those costs will maintain the capital value of the asset for the Council and so the benefit from that investment will not be lost as a result of the rent reduction policy in the way described in para. 7.9.
- 17.4 As part of the revised process, arrangements for the letting of buildings will be formalised, with standard leases or licences replacing 'tenancies at will' as necessary. This will enable rental charges to be reviewed and set at an appropriate level to ensure cost recovery. The maintenance liability and the responsibility for statutory charges will also be formalised through incorporation into the legal agreements. The proposed responsibilities are outlined in the table in paragraph 4.3.
- 17.5 Rental income on leases will be set as, based on an open market rental valuation of the property for community use (Class D1 of the Town and Country Planning (Use Classes) Order 1987).
- 17.6 Rental levels are likely to be higher than those currently in place, however it is proposed that these rents are reduced (i.e. a rent reduction is applied) if the lessee provides community benefits through its use of the asset. It is estimated that 18 council buildings may be eligible for a reduction, which based on a reduction proportion of 80% and a total rental income assessed at £398,695, would reduce the income generated on these assets to £79,739 (see paragraph 13.12).
- 17.7 Given that the proposed 80% reduction is based on adopting the same discount as for charitable rate relief it will be necessary, in the light of the experience of organisations applying for the community benefit rent reduction, to review the actual costs, income forgone and benefits received as a result of this proposed policy. This will enable a more rigorous evaluation of the impact of the policy to be determined and inform future years' proposals.
- 17.7 Licences will be used for the hiring of space in the community hubs, with charges set to recover the costs of managing and maintaining the buildings. Charges will differ depending on whether the space is being used for community events, private events or commercial use. The revenue costs associated with the management, administration and maintenance of the buildings will need to be quantified for inclusion in the council's Medium Term Financial Strategy.

- 17.8 A significant number of the council's community buildings are held under Housing Revenue Account (HRA) powers, and Tenant and Resident Associations (TRAs) recognised by Tower Hamlets Homes will continue to lease some of these assets on a peppercorn rent basis. However, there are other community groups that use HRA facilities but provide General Fund services, and in these cases fees must be levied by the HRA or a financial contribution made by the General Fund for the use of these assets. As a result of this it will be necessary to demonstrate that the HRA is not disadvantaged by this approach.
- 17.9 Alternatively, in cases where voluntary and community sector organisations exclusively provide General Fund services from HRA facilities, it is possible to appropriate the building to the General Fund under Section 122 of the Local Government Act 1972.
- 17.10 An appropriation will result in the transfer of land to the General Fund from the HRA. As a consequence there will be a financial adjustment between the relevant HRA and General Fund Capital Financing Requirements equating to the market value of the asset. This would result in increased loan charges being charged to the General Fund with a corresponding reduction in HRA capital charges. Future rental income will however be credited to the General Fund rather than the HRA.
- 17.11 Overall, it is anticipated that savings will be made as a result of the allocation and charging policy, primarily through a reduction in maintenance and other costs in respect of underutilised assets. As these savings are still to be quantified they have not been included in the council's Medium Term Financial Strategy. It is anticipated that savings will predominantly be generated in the longer term as leases are formalised, however savings will be incorporated into budgets as they are realised over the course of the property by property review that is being undertaken. Over time, the policy should lead to a better use of the council's assets, with buildings only being retained if they provide a service or generate income.
- 17.12 The cost of the Community Buildings review to date has been met from within existing budgetary provision. Additional resources are likely to be required to implement the recommendations arising from the review and these will also need to be considered as part of the Medium Term Financial Strategy.

18 LEGAL COMMENTS

- 18.1 The report seeks recommendations in respect to the establishment of community hub buildings, the regularisation of lease arrangements on a restricted D1 use market rent for those community groups who are unable to utilise the hub buildings and the introduction of a community benefit rent reduction policy for qualifying voluntary and community sector groups.

- 18.2 The Council's powers in relation to property disposal are set out in legislation. Having regard to the type of properties held by the council for the purpose of community use, Section 123 of the Local Government Act ('LGA') and Section 32 Housing Act 1985 ('HA') are most relevant. The HA applies to land held under the Housing Revenue Account and the LGA applies to land held under the General Fund.
- 18.3 The LGA provides that the Council may dispose of land, but that where it does so, it must do so (other than by way of a lease of under 7 years) for a consideration not less than the best that can reasonably be obtained, failing which it requires the consent of the Secretary of State before disposing. To the extent that the proposals relate to the grant of a new lease, the maximum term to be agreed will be 5 years. Accordingly, the requirement to obtain best consideration is not invoked.
- 18.4 The HA states that a local authority may not dispose of any land (including by lease) held by them without the consent of the Secretary of State. The Secretary of State has issued the General Housing Consents 2013 which permit the disposal of land held for housing purposes without the need to obtain express consent in certain circumstances, including disposal of land for a consideration equal to its market value.
- 18.5 In respect to the proposed community benefits rent reduction scheme, this is tantamount to a grant system. The Council has various powers to offer financial assistance, including pursuant to the general power of competence under section 1(1) of the Localism Act 2011, which permits it to do "anything that individuals generally may do".
- 18.6 However, the Council does needs to be mindful that in certain circumstances, the giving of financial assistance can amount to State Aid, which is generally prohibited. Specifically, State Aid is any advantage granted by public authorities through state resources on a selective basis to any organisation that could potentially distort competition and trade in the European Union. The definition of State Aid is very broad because 'an advantage' can take many forms, including a rent reduction.
- 18.7 There is a de minimis threshold for the purposes of European restrictions on State Aid, which amounts to €200,000 over any rolling 3 year period. If, therefore, over a rolling period of 3 years, the benefit is less than €200,000, the European restrictions on State Aid do not apply. However, notwithstanding that the de minimis threshold may not be exceeded in each case, the Council in exercising its functions and spending public funds is required to act in a fair and reasonable way. As such, granting only certain organisations who engage in economic activity and who occupy a community building (for example nurseries) a rent reduction such that the effect would be to favour them over others and potentially distort competition, may be reasonably considered to conflict with the public law principles of fairness and reasonableness.

- 18.8 Whether particular community groups who apply for a rent reduction are considered an organisation engaged in economic activity will be for consideration on a case by case basis.
- 18.9 The Council is required under section 3 of the Local Government Act 1999 to “make arrangements to secure continuous improvements in the way in which its functions are exercised, having regard to a combination of economy efficiency and effectiveness”. This duty, commonly referred to as the 'best value duty', is separate and distinct from the best consideration, or market value duty in terms of property disposals. Best value is in part a financial consideration in terms of value for money, which can be demonstrated by obtaining market rent for property lettings or disposals. The proposals are that open market rent as described in this report be obtained. Best value can also include consideration of community or social value, such that offering particular voluntary to community sector groups a rent reduction can satisfy the best value test.
- 18.10 In accordance with the Equality Act 2010, the Council must have due regard to the need to eliminate unlawful conduct, 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. Given the nature of the organisations who use the community buildings and to whom the community benefit rent reduction policy might apply, a proportionate amount of equality impact analysis has been undertaken in order to assess and mitigate any likely impact of the criteria/policy on groups who share a protected characteristic.
- 18.11 The Secretary of State for Communities and Local Government Directions made on 17th December 2014 pursuant to powers vested in him by the Local Government Act 1999 (“the Directions”), provide at paragraph 4(i) that the Council must “take the actions set out in Annex A....”. Paragraph 5 of Annex A requires that the Council, until 31 March 2017 “obtain the prior written agreement of the Commissioners before entering into any commitment to dispose of, or otherwise transfer to third parties, any real property other than existing single dwellings for the purposes of residential occupation”. Any disposal of land or buildings under the proposed policy will therefore require the agreement of the Commissioners.
- 18.12 The Directions provide at Paragraph 4(ii) and Annex B provide that the Council’s functions in relation to grants also be exercised by the Commissioners. 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). In respect of the community benefit rent reduction, this is likely to be regarded as a grant and, accordingly, the consent of the Commissioners is required.

19 ONE TOWER HAMLETS CONSIDERATIONS

- 19.1 Supporting the voluntary and community sector will increase social capital as well as foster and strengthen community cohesion. The role of the sector in helping reduce poverty is well established; through advice provision, and increasing the employability and job prospects of local residents.
- 19.2 While 78% of residents agree that people from different backgrounds get on well together in Tower Hamlets, recommendations which actively encouraging subletting and shared usage of buildings will also help bring different parts of the Tower Hamlets community together.
- 19.3 While consultation feedback is difficult to draw upon (due to the high numbers of respondents preferring not state their equalities characteristics, and the consequent sample size) several responses expressed that the management of community hubs required equitable policies to be in place, some respondents felt they would be more inclusive if directly managed by the council.
- 19.4 A full equalities analysis has been undertaken (appendix 7) in relation to the Community Benefit rent reduction policy. As a result of performing the analysis, the policy does not appear to have any adverse effects on people who share Protected Characteristics and no further actions in addition to those set out in the action plan are recommended at this stage. The action plan details what mitigation will be in place to ensure both the eligibility criteria and process comply with the Council's equality duty.

20 BEST VALUE (BV) IMPLICATIONS

- 20.1 The recommendations in this report are closely aligned with the council's Best Value Action Plan, which was drawn up following the issuing of Direction from the Secretary of State for Communities & Local Government in December 2014. Recommendations around establishing network of community hub buildings will encourage better utilisation of council assets and will help demonstrate the council's continued compliance with its best value duty.
- 20.2 The proposed principles in this report will ensure that properties are occupied on the basis of formal leases or, in the case of TRAs, management agreements. They represent an efficient and effective use of the council's estate by seeking to recover some of the costs incurred in holding these properties and clearly setting out the respective roles and responsibilities of the landlord and tenant.
- 20.3 In proposing a rent reduction for those organisations which are able to demonstrate they provide additional community benefits, the Council is making a conscious decision to forego the potential additional rental income from this approach which is estimated at £335,713 in total across the 18 buildings currently modelled as providing community benefits. This equates to around £18k per building and given that this benefit will only be given once a

formal process has demonstrated there is a tangible benefit to the Council it would appear to represent a cost effective use of the Council's resources.

21 SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 21.1 There are no immediate and significant sustainability implications arising from this report. As part of the property-by-property review, the service identified poor performing buildings and proposal measures to increase their efficiency subject to the availability of funding. For those buildings in the poorest state of repair a decision will be taken around cost efficiency which may lead to a decision on conversion and disposal.

22 RISK MANAGEMENT IMPLICATIONS

- 22.1 Having a clear, consistent and transparent policy on charging and allocation of community spaces and buildings will minimise the risk of challenge on decisions the council takes in relation to allocating and charging for community-owned buildings.
- 22.2 It also provides increased clarity on the respective roles and responsibilities of the tenant and the council (as landlord). The tenant will be responsible for carrying out all statutory testing, and the requirement for this will be enforced through the terms of the lease.

23 CRIME AND DISORDER REDUCTION IMPLICATIONS

- 23.1 There are no immediate crime and disorder reduction implications arising from this report.

24 SAFEGUARDING IMPLICATIONS

- 24.1 There are no immediate safeguarding implications arising from this report. Community groups who work with young children or vulnerable adults will be expected to comply with all relevant legislative requirements, as well as any specific conditions arising from any award from the council.
- 24.2 This element will be managed by the relevant service directorate.
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Linked Reports, Appendices and Background Documents

Linked Report

- Cabinet Report, 1 December 2015, Community Buildings, Allocation and Charging Policy

Appendices

- Appendix 1 – Location of council-owned community buildings

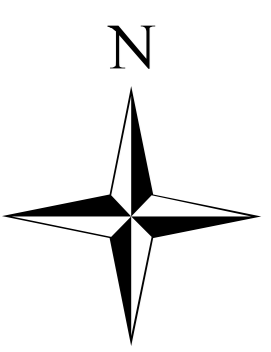
- Appendix 2 – Location of community buildings owned by the council and other providers
- Appendix 3 – Rent reduction simple assessment
- Appendix 4 – Community benefit rent reduction process and flowchart
- Appendix 5 – Community Benefit Rent Reduction Assessment Panel Terms of Reference
- Appendix 6 - Equality Analysis Quality Assurance Checklist (Property)
- Appendix 7 – Equality Analysis (Community Benefit Rent Reduction Scheme)

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

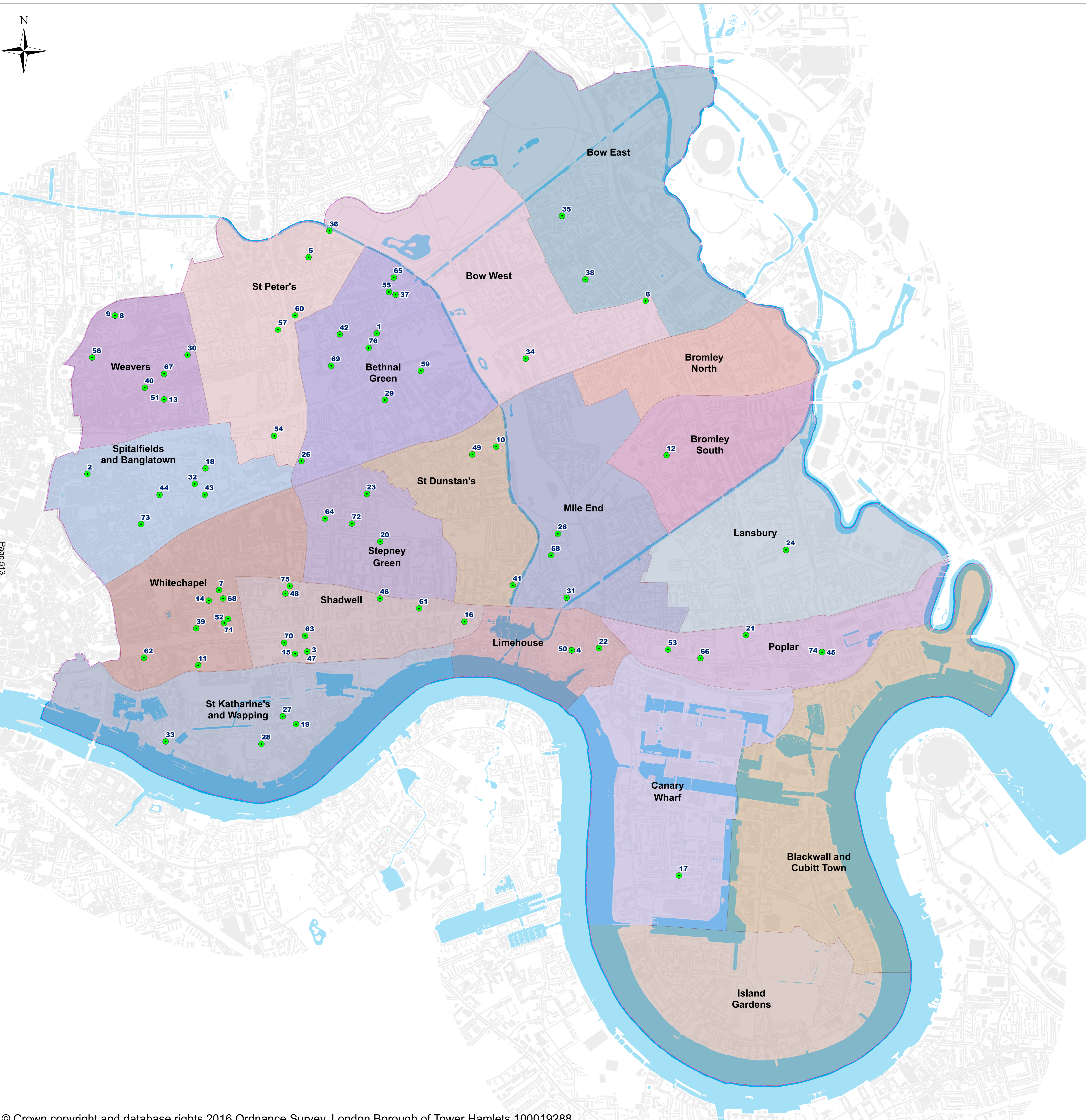
- None

Officer contact details for documents:

- Ann Sutcliffe, Service Head, Corporate Property & Capital Delivery, 020 7364 4077, ann.sutcliffe@towerhamlets.gov.uk
- Zena Cooke, Corporate Director, Resources, 020 7364 4262, zena.cooke@towerhamlets.gov.uk

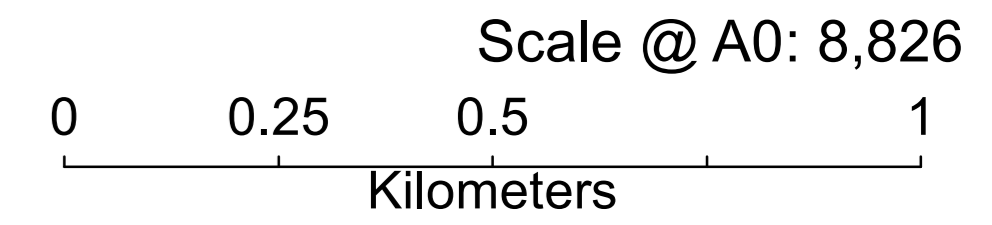


APPENDIX 1- COUNCIL OWNED COMMUNITY BUILDINGS IN LBTH

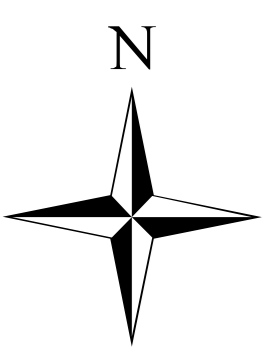


ID	Community Building	ID	Community Building
1	100 Roman Road *	39	Wapping Women Centre *
2	135 Commercial Road	40	Alliston House TRA
3	23a Solander Gardens *	41	Anglia House TRA
4	Barley Mow Veterans Club	42	Burnham Street TRA
5	Bishops Way *	43	Pauline House TRA
6	Caxton Hall	44	Ramar House TRA
7	Delafield House	45	Robin Hood Project Shop
8	Former Dorset Library *	46	Sims House TRA
9	Dorset Social Club	47	Solander Gardens TRA
10	Emmot Close OAP	48	Watney Market TRA
11	Ensign Youth Club *	49	Anson House
12	Fern Street Settlement	50	Barley Mow TRA
13	Granby Hall	51	Bentworth Friendship Club
14	Harkness House	52	Berner Community Centre
15	Highway Club *	53	Birchfield Hall
16	John Scurr Community Centre	54	Collingwood Community Hall
17	Mellish Street *	55	Cranbrook Community centre
18	Osmani Centre *	56	Dunmore Point Community Hall
19	Prusom Street Community Centre *	57	Kedleston Walk
20	Redcoat Community Centre *	58	Locksley Community Centre
21	St Matthias Meeting room	59	Longnor Community Centre
22	St Vincents TRA	60	Mayfield TRA
23	Stifford Centre *	61	Ogilvie TRA
24	Teviot Hall	62	Royal Mint Friendly Club TRA
25	Trinity Centre	63	Shadwell Gardens TRA
26	Turner Road Community Centre *	64	Sidney Estate TRA
27	Wapping Community Centre	65	The Glasshouse
28	Wapping Youth Centre 1st & 2nd Floor	66	Will Crooks Community Centre TRA
29	Wyn Garrett	67	10 Turin Street
30	Avebury Playgroup *	68	9b Burslem Street
31	Cheadle Hall *	69	Bethnal Green Cottage
32	Chicksand Friendship Club *	70	Cable Street Senior Citizen Club
33	Matilda Day Nursery *	71	Christian Street
34	Mile End Nursery *	72	Clichy TRA
35	Ranwell Playgroup *	73	Frostic Walk
36	Scallywags Day Nursery *	74	Robin Hood Gardens TRA
37	Tate House Playgroup *	75	Tower Hamlets Leaseholders
38	Vernon Playgroup *	76	Tramshed TRA

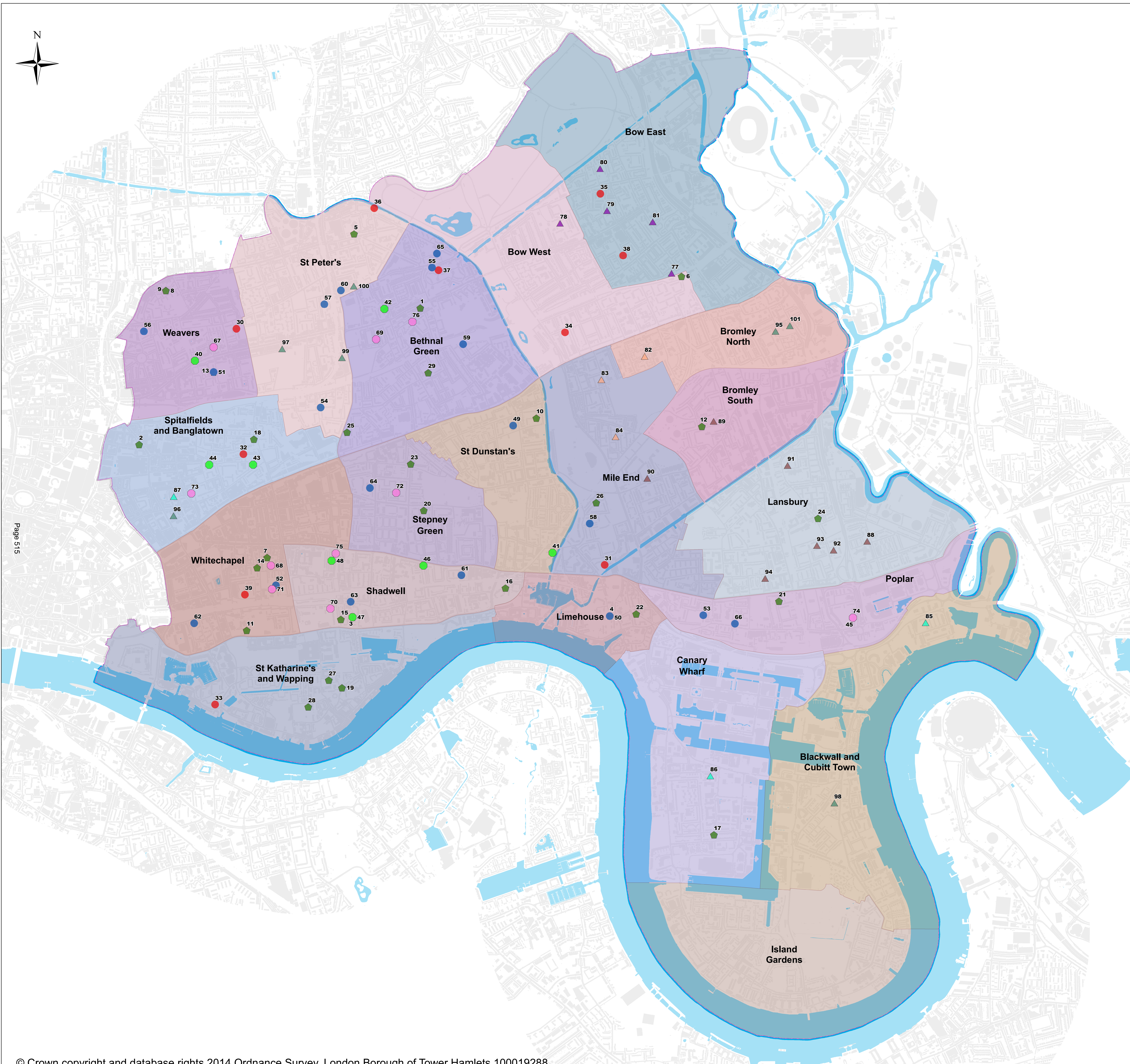
* Based on current usage and arrangements, these properties will not be eligible for the community benefit rent reduction scheme. All other properties will be assessed in line with the agreed process.



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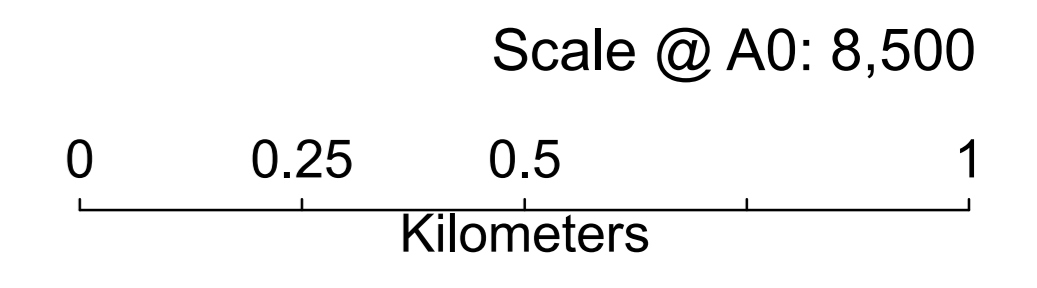
APPENDIX 2- COMMUNITY BUILDINGS IN LONDON BOROUGH OF TOWER HAMLETS



COMMUNITY BUILDINGS	
	Community Halls
	Playgroups and nurseries
	THH-occupied
	Tenants and Residents Associations
	Vacant
	Old Ford/Circle Housing
	East End Homes
	One Housing Group
	Poplar HARCA
	Other

ID	Community Halls
1	100 Roman Road
2	135 Commercial Road
3	23a Solander Gardens
4	Barley Mow Veterans Club
5	Bishops Way
6	Caxton Hall
7	Delafield House
8	Former Dorset Library
9	Dorset Social Club
10	Emmot Close OAP
11	Ensign Youth Club
12	Fern Street Settlement
13	Granby Hall
14	Harkness House
15	Highway Club
16	John Scurr Community Centre
17	Mellish Street
18	Osmani Centre
19	Prusom Street Community Centre
20	Redcoat Community Centre
21	St Matthias Meeting room
22	St Vincents TRA
23	Stifford Centre
24	Teviot Hall
25	Trinity Centre
26	Turner Road Community Centre
27	Wapping Community Centre
28	Wapping Youth Centre 1st & 2nd Floor
29	Wyn Garrett
ID	Playgroups and nurseries
30	Avelbury Playgroup
31	Cheadle Hall
32	Chicksand Friendship Club
33	Matilda Day Nursery
34	Mile End Nursery
35	Ranwell Playgroup
36	Sallywags Day Nursery
37	Tate House Playgroup
38	Vernon Playgroup
39	Wapping Women Centre
ID	THH-occupied
40	Alliston House TRA
41	Anglia House TRA
42	Burnham Street TRA
43	Pauline House TRA
44	Ramar House TRA
45	Robin Hood Project Shop
46	Sims House TRA
47	Solander Gardens TRA
48	Watney Market TRA

ID	Tenants and Residents Associations
49	Anson House
50	Barley Mow TRA
51	Bentworth Friendship Club
52	Berner Community Centre
53	Birchfield Hall
54	Collingwood Community Hall
55	Cranbrook Community centre
56	Dunmore Point Community Hall
57	Kedleston Walk
58	Locksley Community Centre
59	Longnor Community Centre
60	Mayfield TRA
61	Ogilvie TRA
62	Royal Mint Friendly Club TRA
63	Shadwell Gardens TRA
64	Sidney Estate TRA
65	The Glasshouse
66	Will Crooks Community Centre TRA
ID	Vacant
67	10 Turin Street
68	9b Burslem Street
69	Bethnal Green Cottage
70	Cable Street Senior Citizen Club
71	Christian Street
72	Clichy TRA
73	Frostic Walk
74	Robin Hood Gardens TRA
75	Tower Hamlets Leaseholders
76	Tramshed TRA
ID	Old Ford/Circle Housing
77	Tredegar Community Centre
78	Butley Court Community Centre
79	Wrights Road Community Centre
80	Francis Lee Community Centre
81	Eastside Youth & Community Centre
ID	East End Homes
82	The Centre
83	Southern Grove Community Centre
84	Bede Community Centre
ID	One Housing Group
85	Virginia Quays Community Centre
86	Phoenix Heights Community Centre
87	Flower and Dean Community Centre
ID	Poplar HARCA
88	Aberfeldy Neighbourhood Centre
89	Linc Centre
90	St Paul's Way Centre
91	Teviot Centre
92	The Cabin
93	Burcham Street Centre
94	Trussler Community Hall
ID	Other
95	Kingsley Hall
96	Toynbee Hall
97	Oxford House
98	Island House Community Centre
99	Account3
100	St. Margaret's House
101	Bromley-by-Bow Centre



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Outline of the Assessment Procedure for 'Community Benefit rent reduction'.

The Assessment process allows both the Council and voluntary or community sector organisation, to properly investigate whether the organisation applying for the 'Community Benefit Rent Reduction' meets the eligibility criteria, standards, is legally compliant, can manage the asset well, will contribute to local wellbeing and the Council's strategic priorities and is financially sustainable. The process will be supportive, flexible and proportionate to the scale of the proposed reduction.

Step 1 – Offer of lease (as per the agreed council process for the letting of council assets)

- Community Group secures the offer from Tower Hamlets Council of a 3 to 5 year lease at Market Rent for D1 usage.

Step 2 – Expression of Interest for 'Community Benefit Rent Reduction'

- Expression of Interest for a 'Community Benefit Rent Reduction' submitted by the community group.
- On receipt of the Initial Expression of Interest a council link officer (from the Third Sector Team) working with the CVS, will be nominated as the contact person for throughout the process who will, at this stage review the EOI application and any documentation received. If this application and documentation appears to provide a *prima facie* case for offering a 'Community Benefit Rent Reduction' they will then arrange to meet with the organisation and explore their application more fully. If the organisation's Expression of Interest does not meet the criteria to be eligible to apply for the Community Benefit rent reduction the link officer will write to the organisation setting out the reasons that their EOI was not approved. The organisation will have the opportunity to ask for the decision to be reviewed by the Council and the Appeals Panel will review the decision.
- For those organisations that are considered eligible to apply for the Community Benefit Rent Reduction, the meeting arranged by the link officer will be to discuss the full requirements of the standards the organisation will need to meet so they are clear from the outset of what is involved; the link officer will note and discuss any particular challenges the group might face in meeting the standards and will confirm the support available from THCVS or another relevant body as appropriate; they will note from the organisation any information that the council will need to supply to enable them to complete the required work such as figures for utility usage or other costs relevant to the business plan;
- If they feel the application does not merit progressing the link officer will give full feedback to the group. This provides learning not just to the group but also for other groups who are thinking of applying. Accessibility, transparency and accountability throughout the process will be key.
- Following the meeting with the applicant the appointed link officer will make a report to the Assessment Panel. This will summarise the information gathered to date, identify any potential benefits, needs or concerns, and identify the specific support needs of the applicant going forward if the application is to be progressed positively. A copy of this report will be provided to the organisation and an opportunity offered for them to correct any factual inaccuracies before submission to the Assessment Panel.

- If the EOI is rejected by the Assessment Panel, reasons for the decision will be provided and the community group will have a right of appeal via written representations.

Step 3 – Meeting the Standards for ‘Community Benefit Rent Reduction’

- If the EOI is accepted then the next stage is for the organisation to demonstrate that they meet the eligibility criteria set out in the policy for being offered a ‘Community Benefit Rent Reduction’:
 - **Testing the skills, knowledge and capacity**
 - **Testing the business case**
 - **Testing the social, economic, and environmental value**

Throughout this stage of the assessment process the council link officer will remain in regular contact with the organisation, encouraging and motivating the group, providing guidance on how to meet the criteria, signposting to help and support as required, and helping the group to access information they may need from the council.

- To **Test the skills, knowledge and capacity** the [preVISIBLE](#) tool will be used. *preVISIBLE* is a nationally available legal compliance tool developed originally by Community Matters and now hosted by [Advising Communities](#). Once the organisation has completed the tool they will need to request and pay for **a review and report to be conducted by the independent national VISIBLE assessors**. The final report will provide not just a clear assessment of the legal compliance of the group but supportive advice and guidance on how to meet the requirements of the law and best practice where those have not been met.
- A timetable will be agreed with the organisation to provide sufficient time to deal with any issues raised by the *preVISIBLE* report before it is submitted to the Assessment Panel.
- To **Test the business case** a completed business plan will need to be provided by the group. A standard format will be required from all groups though some flexibility will be exercised where a group already has a well developed business plan in an alternative format so long as it can be shown that it essentially covers all aspects of the standard format. The business plan should be proportionate in scope and detail to the size and scope of the organisation’s operations.
- To **Test the social, economic, and environmental value** whilst keeping the assessment process proportionate to the size and scope of the organisation a two-tier process will be used. For organisations where the potential value of the ‘Community Benefit Rent Reduction’ they are applying for is equal to or less than £20K it is recommended that a simple table linking charitable/social objects of the group to their activities and in turn linking these activities to the council’s strategic priorities be used.

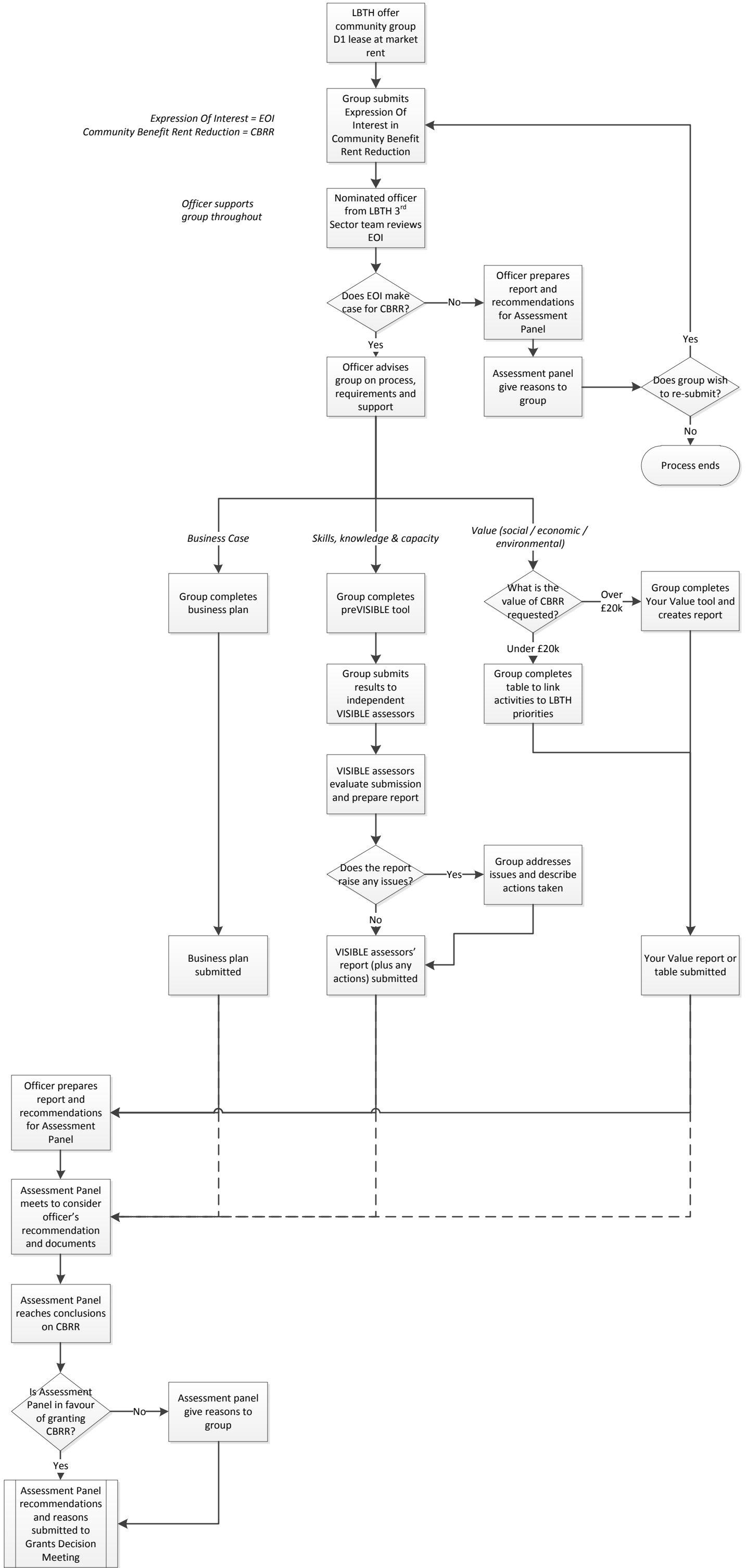
For groups where the potential value of the ‘Community Benefit Rent Reduction’ they are applying for is greater than £20K the independent [Your Value](#) tool will be used. This tool was developed by Community Matters to help community groups demonstrate their social, economic, and environmental value. It is now also hosted by Advising Communities and cost £100 including VAT to set up an account for 1 year.

Step 4 – Assessment and decision to award a ‘Community Benefit Rent Reduction’

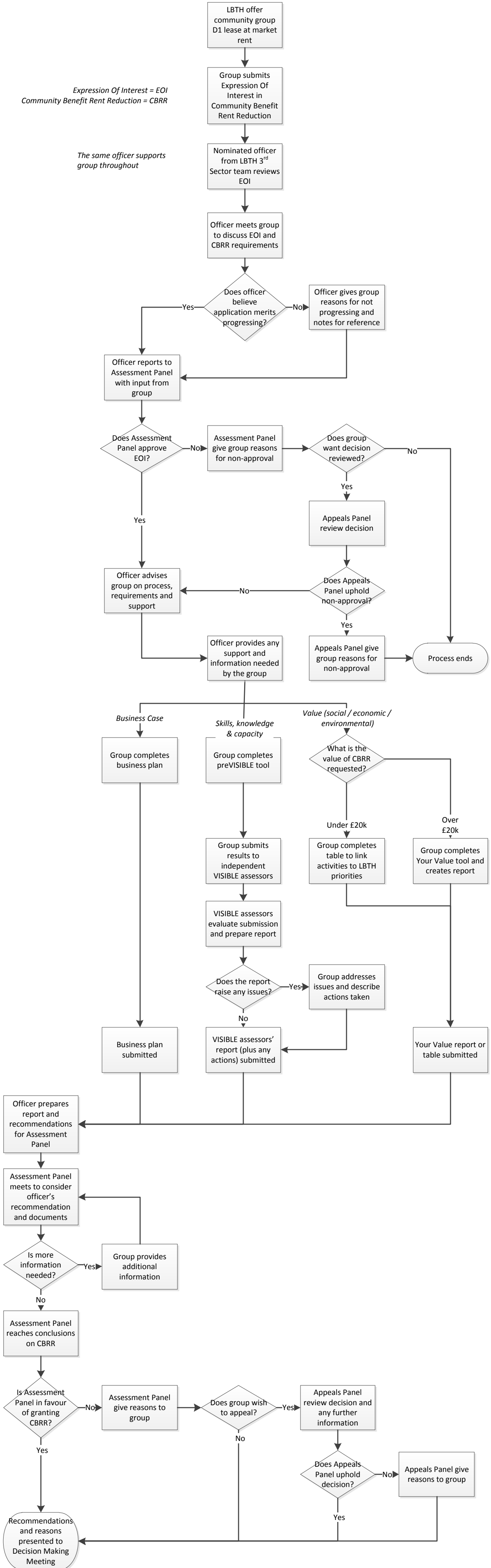
- Once the community group have provided a *pre*VISIBLE report (with a commentary on work done to meet any issues raised in the report), a business plan, and either the Outcomes table or a Your Value report, the council link officer will produce a report and recommendation for the Assessment Panel with regards offering a ‘Community Benefit Rent Reduction’ with the supporting documentation.
- The Assessment Panel meets and reviews the report and recommendation of the council link officer.
- At this stage the Assessment panel may request further information or work before confirming the ‘Community Benefit Rent Reduction’. In this case full feedback will be provided and clear guidance and what further is required to meet the criteria will be.
- If the Assessment Panel makes a final decision not to award the ‘Community Benefit Rent Reduction’ full reasons will be provided to the organisation. The organisation will have the right of appeal. The Appeals panel will consider and review the decision of the Assessment panel and any further information provided by the organisation and will make a final decision on the award of the Community Benefit Rent Reduction. The organisation will be notified of the Appeals panel’s decision in writing.
- The recommendations of the Assessment Panel (and where relevant the Appeals panel) will be presented to the Grants Decision Meeting setting out the reasons and evidence for the decision.

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Community Benefit Rent Reduction process



Community Benefit Rent Reduction process



Community Benefit Rent Reduction Assessment Panel

Terms of Reference

Purpose:

Tower Hamlets Council recognises that the local community sector is a valuable and important asset that deliver important services and benefits to local residents. Tower Hamlets Council is committed to ensuring this community value is appropriately recognised and reflected in its community buildings lettings policy.

Recognising that actively investing in the local community sector often represents good value for the public purse and helps Tower Hamlets Council achieve its own social, economic, and environmental outcomes as set out in its Community Plan, Tower Hamlets Council will offer, through a consistent, transparent, and accountable process, a Community Benefit rent-reduction to organisations that meet the Eligibility Criteria set out in the Council's policy.

The purpose of the Assessment Panel is to ensure the fair and transparent application of the Council's Community Benefit Rent Reduction policy and to assess individual applications and make decisions on whether an applicant has met the requirements of the Eligibility Criteria.

Composition:

- The Assessment Panel will comprise the Head of Revenues, the Head of Benefits and a representative of THCVS. The Panel will be chaired by the Head of Revenues.

Role and Responsibilities:

- To consider and make recommendations on initial Expression of Interests from organisations and the link officer's assessment report.
- To consider and make recommendations on the independently produced *pre*VISIBLE report that tests the skills, knowledge and capacity of the organisation.
- To consider and make recommendations regarding the organisation's business plan.
- For organisations where the rent reduction would be greater than £20k per annum to consider and make recommendations on the *Your Value* Report.
- To request and consider any supplementary information considered necessary to make recommendations.
- For organisations appealing the Grants Decision Making meetings decisions, to provide to the Appeals panel details of the recommendations made by the Assessment panel that resulted in the organisation not being considered eligible.
- To advise the Grants Decision Making meeting on the recommendations made and the reasons for those recommendations.
- To consider the findings of the annual review process and compliance audits monitoring reports

Frequency of Meetings:

- The Assessment Panel will meet as and when applications are received and at least twice a year to consider the findings of the annual review and compliance audit.

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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)	Community Buildings Review (Property Elements)
Directorate / Service	Development & Renewal, Corporate Property & Capital Delivery
Lead Officer	Ann Sutcliffe
Signed Off By (inc date)	
Summary – to be completed at the end of completing the QA (using Appendix A)	<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>As a result of performing the QA checklist, the policy, project or function does not appear to have any adverse effects on people who share Protected Characteristics and no further actions are recommended at this stage.</p> </div> </div>

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Key questions			
a	Does the proposal have a legitimate aim?	Yes	The proposal aims to regularise the occupation of a number of tenants in the council's community buildings portfolio and sets out proposals for the management of those buildings going forward. The current bases of occupation could be found to be incompatible with various legal obligations the council is under.
b	Is the proposal proportionate, appropriate and necessary?	Yes	Yes; the proposals in the report satisfy the council's legal obligations in respect of s123 LGA72 and s32, HA85 as well as the council's general duties to act fairly, openly and transparently. In order to mitigate some of the potential impacts, the council is also establishing a number of

			community hubs. This will increase the availability of affordable space in the borough; not just for existing tenants but also for groups who may not currently have access to community activity space. To mitigate the financial impact of the new charging regime, the council is establishing a Community Benefit Rent Reduction Scheme (this is the subject of a separate equalities analysis).
c	Is the proposal fair and reasonable?	Yes	See above and Cabinet report

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	There are two main potential outcomes for existing users: <ul style="list-style-type: none"> To remain in their existing premises and enter into a lease; or To move into a community hub on a licence. Both of these outcomes will require a rent to be paid (except for TRA-activities in HRA buildings). Tenants may be able to get some support from the council to meet those costs (see detail of community benefit rent reduction scheme in the report).
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 Yes – limited	There are a broad range of users in the council's current community buildings portfolio. This includes disability support groups, tenants and residents associations, youth groups, faith groups and nurseries/playgroups. A range of activities are being delivered from the current estate. However, while the primary use is known, in many cases the council does not have any detailed information on who the actual users of these facilities are. Where tenants apply for a rent reduction under the proposed scheme, they will be asked to submit information on the equality profile of their users.
2	Monitoring / Collecting Evidence / Data and Consultation		

a	Is there reliable qualitative and quantitative data to support claims made about impacts?	No	In relation to the property elements, this is difficult to know for the time being until there is more certainty on which organisations will be offered leases and which will be moving to a community hub. There is likely to be impacts for the elderly and those who are disabled accessing services. However, the council will be taking steps to ensure that where groups move to hubs, it is a reasonable distance from their existing premises. In addition, these hubs will be in a much better condition than much of the existing estate, particularly in terms of accessibility.
b	Is there sufficient evidence of local/regional/national research that can inform the analysis?	No	
c	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Yes	
d	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	A consultation exercise was carried out which asked questions about the proposals to create community hubs and enter into leases where tenants were to stay in existing buildings. Both of these proposals were supported (60% strongly agreed or tended to agree with the community hubs proposals; 68% strongly agreed or tended to agree with the proposal to enter into leases).
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?	No	
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	There is likely to be impacts for the elderly and those who are disabled accessing services. However, the council will be taking steps to ensure that where groups move to hubs, it is a reasonable distance from their existing premises. In addition, these hubs will be in a much better condition than much of the existing estate, particularly in terms of accessibility
4	Mitigation and Improvement Action Plan		

a	Is there an agreed action plan?	Yes	The service will be monitoring the equalities information that is collected by the Third Sector Team as part of the Community Benefit Rent Reduction Scheme. This will help us better understand who uses our buildings and also help us address where, or why, there may be gaps in provision.
b	Have alternative options been explored	Yes	
5	Quality Assurance and Monitoring		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	
b	Is it clear how the progress will be monitored to track impact across the protected characteristics?	No	
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
2016/74

Section 1 – General Information (Aims and Objectives)

**See Appendix
A**

Community Buildings Review – Recommendation Report

Current decision
rating



The Council recognises that the Voluntary and Community Sector (VCS) is a valuable and important asset that delivers vital services and benefits to local residents. The council is committed to ensuring this community value is appropriately recognised and reflected. The Council also recognises that local organisations are often best placed to manage facilities within their local communities. Their local knowledge, extensive use of volunteers and hands on management of the asset can result in better services which meet the needs of the wider community, lower overheads and offer better value-for-money. Further, recognising that actively investing in the VCS often represents good value for the public purse and helps the Council achieve its social, economic and environmental outcomes as set out in the Community and Strategic Plans.

The Council is proposing to offer, through a consistent, transparent, and accountable process, some voluntary and community groups, a community benefit rent reduction where they meet specified criteria.

Nurseries and places of worship would not be included in the criteria for community benefit rent reduction because nurseries are engaged in economic activity and because places of worship do not provide wider community benefit. This could therefore impact on groups of people who fall within the age and religion and belief protected characteristic groups. This EA identifies the scope of that potential impact and identifies the mitigating actions required to address any adverse effects.

This equalities analysis is specifically in relation to the introduction of the community benefit rent reduction aspect of the Community Buildings Review – Recommendation Report.

Conclusion - To be completed at the end of the Equality Analysis process

As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share *Protected Characteristics* and no further actions in addition to those set out in the action plan are recommended at this stage.

Name: Zena Cooke
(signed off by)

Date signed off: 21 October
(approved)

Service area:

Resources / Development and Renewal

Team name:

Third Sector Team

Service manager:

Everett Haughton / Steve Hill

Name and role of the officer completing the EA:

Mohammed Ahad – Community Programmes Officer

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?

- Audit of the Council community buildings portfolio – detailing usage of community buildings and what services are being delivered
- Findings from the Community Buildings consultation
- Findings from the two meeting of the Community Benefit Working group
- LBTH Community & Strategic Plan
- LBTH VCS Strategy
- LBTH Asset and Capital Strategies
- December 2015 Cabinet Paper - Community Buildings: Allocation & Charging Policy

Section 3 – Assessing the Impacts on the 9 Groups

Please refer to the guidance notes below and evidence how you're proposal impact 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?**

Of the 74 community buildings within the Council's portfolio, 15 (10 nurseries and 5 places of worship) have currently been identified as being impacted in that they will not be eligible for the community benefit rent reduction.

- **What qualitative or quantitative data do we have?**

List all examples of quantitative and qualitative data available

- Census 2011 data on Tower Hamlets population
- Office of National Statistics (ONS) population estimate
- The London Voluntary Service Council (LVSC) on VCS profile in Tower Hamlets
- Community Plan 2015
- Joint Strategic Needs Assessment
- Borough Equalities Assessment

- **Equalities profile of staff?**

N / A

- **Barriers?**

Key challenges facing VCS organisations that are based in Council buildings include those arising from national public spending cuts and a consequent rise in demand for VCS services. Other and related challenges for the sector include:

- Access to affordable premises
- Availability of funding from grants and other sources
- Continually finding ways of doing more with less
- Remaining financially resilient
- Continual changes to the local population's demography
- Demonstrating outputs and outcomes
- The volume and range of other VCS organisations
- Public and private scrutiny of VCS spending and the impact of this on fundraising

- **Recent consultation exercises carried out?**

- Online survey
- Drop in sessions across the borough
- Tower Hamlets Council for Voluntary Services (THCVS) Premises Forum meeting
- A working group was established to agree the criteria for the community benefit rent reduction and consisted of council officers, Tower Hamlets CVS, Tower Hamlets Homes and representatives from the Premises Forum. The group was co-chaired by the Corporate Director of Resources and Chief Executive of Tower Hamlets VCS and was facilitated by a jointly appointed independent consultant

- **Additional factors which may influence disproportionate or adverse impact?**

N / A

- **The Process of Service Delivery?**

Equalities monitoring and analysis will be built into following to comply with general equality duties and equality more broadly:

- The criteria for community benefit rent reduction
- Any contracts for awards for community benefit rent reduction
- Annual monitoring and compliance audits

Target Groups	Impact – Positive or Adverse	Reason(s)
Race	Neutral	<p>No inadvertent bias or discrimination on the basis of race is indicated in the proposals.</p> <p>The council recognises that some existing and emerging communities in the borough may organise themselves in informal ways, based upon more personal networks of support that may be invisible to statutory services. Access to services and resources may be more difficult for these groups. The criteria for the community benefit rent reduction includes willingness for organisations offer space and support to other smaller local groups</p> <p>Organisations that are eligible for the community benefit rent reduction will need to demonstrate how their services promote equality and strengthen community cohesion as part of the assessment process. Where a community benefit rent reduction has been awarded the organisations must evidence as part of their annual monitoring arrangements and compliance audits how they continue to promote equality and strengthen community cohesion</p>
Disability	Neutral	<p>No inadvertent bias or discrimination on the basis of disability is indicated in the proposals.</p> <p>Organisations that are eligible for the community benefit rent reduction will need to demonstrate how their services promote equality and strengthen community cohesion as part of the assessment process. Where a community benefit rent reduction has been awarded the organisations must evidence as part of their annual monitoring arrangements and compliance audits how they continue to promote equality and strengthen community cohesion.</p>
Gender	Neutral	<p>No inadvertent bias or discrimination on the basis of gender is indicated in the proposals.</p> <p>Organisations that are eligible for the community benefit rent reduction will need to demonstrate how their services promote equality and strengthen community cohesion as part of the assessment process.</p>

		Where a community benefit rent reduction has been awarded the organisations must evidence as part of their annual monitoring arrangements and compliance audits how they continue to promote equality and strengthen community cohesion
Gender Reassignment	Neutral	<p>No inadvertent bias or discrimination on the basis of gender reassignment is indicated in the proposals.</p> <p>Organisations that are eligible for the community benefit rent reduction will need to demonstrate how their services promote equality and strengthen community cohesion as part of the assessment process. Where a community benefit rent reduction has been awarded the organisations must evidence as part of their annual monitoring arrangements and compliance audits how they continue to promote equality and strengthen community cohesion</p>
Sexual Orientation	Neutral	<p>No inadvertent bias or discrimination on the basis of sexual orientation is indicated in the proposals.</p> <p>Organisations that are eligible for the community benefit rent reduction will need to demonstrate how their services promote equality and strengthen community cohesion as part of the assessment process. Where a community benefit rent reduction has been awarded the organisations must evidence as part of their annual monitoring arrangements and compliance audits how they continue to promote equality and strengthen community cohesion</p>
Religion or Belief	Neutral	<p>Places of worship will not be eligible for the community benefit rent reduction. There are 5 known buildings within the portfolio which are currently being used as places of worship, all are mosques. These buildings are currently paying the full community rent and will continue to pay the same rate upon implementation of the proposal therefore there will be no change in their circumstances.</p> <p>The council will monitor any the impact of the community benefit rent reduction criteria on this type of group as the implementation plan progresses with the possibility of engaging the Council of Mosques and the Tower Hamlets Inter-Faith Forum should any issues arise.</p>
Age	Adverse	<p>As nurseries will not be eligible for the community benefit rent reduction there is a potential adverse impact on children who attend these nurseries as well as working parents. There are 10 nurseries that are based in Council Community Buildings. Some of these are currently paying a reduced rent which is expected to now be a community rent with the introduction of these proposals.</p> <p>To mitigate any adverse impact a plan of engagement will be devised by the Council's Early Years' Service to demonstrate what practical support and funding arrangements will be available to these nurseries to ensure their sustainability as part of the Council's commitment to ensuring sufficient high</p>

		<p>quality child care places are available in the borough</p> <p>The council will continue to monitor any further adverse impact on this group.</p>
Marriage and Civil Partnerships.	Neutral	<p>No inadvertent bias or discrimination on the basis of Marriage and Civil Partnerships is indicated in the proposals.</p> <p>Organisations that are eligible for the community benefit rent reduction will need to demonstrate how their services promote equality and strengthen community cohesion as part of the assessment process. Where a community benefit rent reduction has been awarded the organisations must evidence as part of their annual monitoring arrangements and compliance audits how they continue to promote equality and strengthen community cohesion</p>
Pregnancy and Maternity	Adverse	<p>As nurseries will not be eligible for the community benefit rent reduction there is a potential adverse impact on nursery places which in turn may impact the pregnancy and maternity protected characteristic. Some of these nurseries are currently paying a reduced rent which is expected to now be a community rent with the introduction of these proposals.</p> <p>To mitigate any adverse impact a plan of engagement will be devised by the Council's Early Years' Service to demonstrate what practical support will be available to these nurseries. The transition from paying a limited contribution for their building to paying a community rent will not be straightforward for many of these organisations and it may be necessary for a phased introduction of the charges which will be considered in consultation with the relevant service who will also be able to offer business planning advice and mentoring to minimise the impact of the introduction of charges. This will be supplemented by support from THVCS that will be funded by the Council as part of the THCVS infrastructure support contract.</p> <p>In addition to this, ensuring there are more nursery places in the borough is a Council priority. Council community buildings that are vacant as a result of organisations moving into the Community Hubs have the potential to be turned into nursery's to meet this growing demand.</p> <p>The council will need to continue to monitor any further adverse impact on this group.</p>
Other Socio-economic	Neutral	No inadvertent bias or discrimination is indicated in the proposals.

Carers		Organisations that are eligible for the community benefit rent reduction will need to demonstrate how their services promote equality and strengthen community cohesion as part of the assessment process. Where a community benefit rent reduction has been awarded the organisations must evidence as part of their annual monitoring arrangements and compliance audits how they continue to promote equality and strengthen community cohesion
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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 (inc' staff) could be adversely and/or disproportionately impacted by the proposal?

Yes? 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? ✓ No?

How will the monitoring systems further assess the impact on the equality target groups?

Organisations that are awarded a community benefit reduction in rent will need to detail, on an annual bases that they are promoting equalities and strengthening cohesion. This will be part of the annual monitoring arrangements and will also include a compliance audit.

Does the policy/function comply with equalities legislation?
(Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)

Yes? ✓ No?

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?

Equalities monitoring will be embedded in the implementation method of each of the activities. This will include adaptations or extensions to current monitoring systems, relevant timeframes and a commitment to carry out an EA review once the strategy has been in place for one year.

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.

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
<p>Plan of engagement to be developed on how to mitigate any adverse impact as a result of nurseries not being eligible for the community benefit rent reduction and having to move to the community rent lease</p> <p>Support places of worship to access other sources of funding should any issues arise</p>	<ul style="list-style-type: none"> - Plan of engagement to be devised by the Early Years' Service on supporting effected nurseries. - Contract between LBTH and The Tower Hamlets CVS to capacity support organisations who may be at risk as a result of not being eligible for the community benefit rent reduction - Engagement with the 5 places of worship and any others identified either directly or through the Council of Mosques and Tower Hamlets and Interfaith Forum on any support needs to reduce impact on service users - Further modelling of equalities impact on identified groups 	<p>March 2017</p> <p>March 2017</p> <p>March 2017</p>	<p>Pauline Hoare</p> <p>Steve Hill</p> <p>Steve Hill / Ann Sutcliffe</p>	
<p>Ensure equalities is embedded within the community benefit rent reduction policy</p>	<ul style="list-style-type: none"> - Criteria for community benefit rent reduction to include evidence of organisation promoting equalities - Equalities monitoring to be included within the monitoring 	<p>March 2017</p> <p>Annual</p>	<p>Steve Hill</p> <p>Steve Hill</p>	

	arrangements			
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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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<p>Cabinet</p> <p>1 November 2016</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Melanie Clay, Corporate Director, Law, Probity and Governance</p>	<p>Classification: Unrestricted</p>
<p>Somali Task Force Report</p>	

<p>Lead Member</p>	<p>Councillor Amy Whitelock Gibbs, Cabinet Member for Health and Adult Services</p> <p>Councillor Sirajul Islam, Statutory Deputy Mayor and Cabinet Member for Housing Management & Performance</p>
<p>Originating Officer(s)</p>	<p>Sharon Godman, Service Head, Corporate Strategy and Equality</p>
<p>Wards affected</p>	<p>All Wards</p>
<p>Key Decision?</p>	<p>Yes</p>
<p>Community Plan Theme</p>	<p>One Tower Hamlets</p>

Executive Summary

The Somali Task Force was set up, at the Mayor's request, to review the issues faced by a community group with comparatively high levels of need. The Task Force reviewed areas where outcomes for Somali residents are lower than for other groups to identify ways to improve.

This report details the process and work carried out by the Task Force and the recommendations that have emerged from the review. The report includes a draft action plan in response to the recommendations, which has been developed with services across the council and incorporating views of Task Force members.

The report includes twenty-three recommendations and many of the actions can be delivered within existing budgets by making changes to how services currently operate and engage with this community. However there are three overarching themes where progress is needed and which propose additional investment:

- access to services (a community hub with a particular focus on the Somali community);
- jobs and skills (two new programmes focussed on ESOL for adults and paid internships for young people);
- capacity-building and employment (specific initiatives to build skills and support people to access leadership roles in the council and community).

Recommendations:

The Mayor in Cabinet is recommended to:

1. Agree the Task Group's report
2. Consider and agree draft Action Plan, including additional budget requirements to be considered as part of the Medium Term Financial Plan
3. Agree the monitoring arrangements as set out in paragraph 3.19

1. REASONS FOR THE DECISIONS

- 1.1 Outcomes for Somali residents are poorer than other groups across key areas of health and wellbeing, housing and employment. Despite a number of engagement and research projects to investigate and improve outcomes in the past, there remains a sense of frustration at a lack of progress and action to address the challenges amongst Somali residents.
- 1.2 The Mayor and Cabinet in Tower Hamlets identified a need to better understand the challenges in narrowing the gap in outcomes for Somali residents. In September 2015 the Mayor established the Somali Task Force to engage Somali residents and review areas of persistently poor outcomes.
- 1.3 The council is also facing the most significant financial reductions in modern history. A key approach to date has been to identify savings by rationalising and mainstreaming services whilst taking into account the impact on key equality groups and mitigating any adverse impacts; meaning that future provision should include the capacity and flexibility to meet diverse needs. This will be a key area of monitoring as savings continue to be realised. The Task Force provides a further opportunity to test issues relating to mainstreaming services for community groups who are often most in need and can face access barriers.

2. ALTERNATIVE OPTIONS

- 2.1 The Mayor in Cabinet could choose not to agree the recommendations and action plan set out in this report. This is not recommended as the terms of reference for the Task Force were agreed as a Cabinet Commission to review and engage the Somali community to identify areas of improvement across local services to better meet community needs. The Task Force also fulfils a key manifesto commitment by the Mayor.

3. DETAILS OF REPORT

- 3.1 The Task Force was chaired by Deputy Mayor Cllr Sirajul Islam, with Cllr Amina Ali as vice chair. Cllr Amy Whitelock Gibbs has responsibility for the delivery of the action plan. The Task Force included a steering group of Somali community members and supporting officers, and a wider reference group with an open membership approach enabling individuals to participate on the issues that they were most interested in.
- 3.2 Initial data analysis undertaken to develop a profile of the local Somali community suggested that the three most significant areas with the widest gap in outcomes were employment, health and housing need. The research findings were presented to the group to help develop a work programme, in consultation with the reference group, and the final themes that were agreed were:

- health and social care
- youth provision and community safety
- employment and educational attainment
- housing and welfare reform.

For each of these areas, services undertook further analysis and presented the evidence on needs and current approaches to meeting them. The reference group participated by considering the material presented, bringing community insight to the discussion and by suggesting areas for action and issues to take into consideration for future provision.

- 3.3 There were significant challenges in accurately profiling the needs of the Somali community because of the way Somali, as an ethnicity, is not included across key national data sets, including the Census. It is particularly difficult to evidence the differences between the needs of the older adult population that may have arrived as first generation migrants to the UK compared to UK-born second and third generation Somali residents. However the expectation was that there are significant differences; for example, in terms of language need, women's participation and barriers to employment. This was borne out by the views and evidence provided by the Task Force reference group.
- 3.4 Members of the Task Force were sceptical about the council's estimates of the Somali population in the borough and challenged some of the data that was presented to them. Many members of the group raised that their experiences were sometimes of isolation and exclusion from services. It was felt that Somali residents, at times, did not access services for a range of reasons, including a perception that they would not be welcome and a lack of provision for language support. The Task Force felt that many Somali residents are more reliant on word of mouth information for their understanding of what services are available and how to access them, and that caused a reliance on the members of the Somali community employed within public and third sector organisations.
- 3.5 The report makes twenty-three recommendations with a focus on three key priority areas of improving access to services through a 'service hub' approach, actions covering jobs and skills to improve employment levels and capacity-building and empowerment. The recommendations also cover improvements to data collection, health and social care, youth services, community safety, educational attainment, employment, housing and welfare reform. The recommendations include calls to improve representation of the Somali community within the workforce, assist young people into relevant careers, and to help support community resilience.
- 3.6 Most of the actions can be delivered within existing funding and budgets. However, there are some recommendations that require additional resources. The most significant of these is Recommendation 3: The council develops a hub approach to key services to improve access and target key areas where the gaps in outcomes are the greatest.

3.7 *Recommendation 3: A Hub Approach*

A consistent theme identified by the Task Force members was that many Somali residents experience difficulties in accessing council services. The council more broadly is seeking to provide community hubs across the borough and the recommendation is for one of the hubs to include services with a particular focus on the Somali community. Whilst this hub would also be open to use by the wider community (such as residents on the surrounding estate or community groups wishing to hire space), the intention is that it could be an important focus of services for Somali residents, and used in the longer term to encourage Somali residents to access Council services more widely.

- 3.8 The new service model of community hubs is still being developed and the hubs will be established flexibly across the borough, depending on current users and local need. As such, a community hub which is still open access but would have a particular focus on the Somali community can fit with this new model while meeting the needs raised by the Task Force. This hub would still be open access and would maximise use of the building, as per the broader community buildings proposals. Making the hub inclusive in this way will bring wider benefits for cohesion and community relations.
- 3.9 The idea of a hub, as outlined in the community buildings report, is primarily to provide space for existing community groups displaced from underutilised premises – along with new community groups – to have somewhere to meet and carry out their activities. However, it is also possible for hubs to provide a base for Council or partners services – either directly delivered or commissioned.
- 3.10 A potential site for the hub has been identified at Granby Hall (St Matthews Row, E2 6DT) which is currently underutilised. It has been identified as a possible community hub following the recent property review. As a hub, Granby Hall could operate as a building offering both Council services and space for local community groups to hire. The Community Buildings Report is to be considered at the November Cabinet also.
- 3.11 Granby Hall currently has two main tenants: the Somali Senior Citizens Club (main building) and Bentworth Pensioners Group (secondary building) who will be part of the discussions and development work for the hub.
- 3.12 The development of a hub at Granby Hall could also help facilitate the saving proposal relating to Mayfield House which is in close proximity. Mayfield House is a Somali day centre attended by a small number of eligible social care users (men only); currently it also operates as an informal drop-in for other Somali men without social care needs. The Mayfield House premises is in a poor state of repair and also does not enable women to access to service. The main needs met by Mayfield House are social interaction and health activities, which could be met by the lunch club and drop-in currently at Granby Hall, supported by the health activities by diverting them from Mayfield House to Granby Hall. The development of Granby Hall as a hub could support some of the service users who have previously utilised Mayfield

House, as well providing a space for a broader group of older residents, including Somali women.

- 3.13 Discussions with Directorates indicate that a range of other existing Council and commissioned services could also operate from a hub at Granby Hall on a sessional or drop-in basis. The lead service undertaking the development of the Hub is the Third Sector Service. The services provided from the hub could include: health and wellbeing sessions, information and advice services including on housing, benefits and the Care Act, and integrated employment services. The action plan attached to this report provides further detail of potential services.
- 3.14 Whilst there is clearly potential for a hub approach to Granby Hall there are some risks and implementation issues to resolve. These include:
- *Governance and community relations:* The existing tenant groups highlighted above will need to be engaged in the discussion to develop the hub. There is also a demand from local tenant groups to access to building. Currently, the Somali Senior Citizens Club use the main part of the building but discussions have already begun in relation to how this space could be used in future. They have indicated they are supportive and keen to assist with considering how the building could incorporate a wider offer for older people (including women) and other services for adults across health, information, advice and employment. However, further work needs to be done to clarify governance and tenancy arrangements in the short and long-term, to enable current users to access the building alongside council services and other potential users who may wish to lease space, to help meet the rent contributions. The other part of the building is also under-utilised so discussions need to be held with the Bentworth Pensioners Group.
 - *Developing and managing the Council's service offer from the hub:* whilst a range of services have provisionally indicated that they could operate from Granby Hall, further work is needed to develop this offer, including finalisation of financial implications and ongoing revenue budget. The use, demand and effectiveness of the hub will need to be managed and monitored carefully.
 - *Asset management:* the building is approximately 6,500 sq. ft of space, including the area used by Bentworth Pensioners Group, and would require refurbishment to develop it into a multi-use facility; there would be costs related to this and asset management have confirmed there are capital funds available as part of the community buildings strategy to undertake building works for community hubs.
- 3.15 If the Mayor agrees to develop a Hub at Granby Hall, its implementation could be phased i.e. widening use of the hub to Mayfield House and other Somali elders more quickly, then incremental build-up both of Council services and licensing of space to the community. For example, additional community organisations could be using Granby Hall on a pilot basis within the calendar year.

ESOL and Employment

- 3.16 In addition to the above, there are two recommendations where additional activity could be undertaken at a further (one-off) cost. Recommendation 16 relates to increasing the take up of English for Speakers of other Languages (ESOL) from within the Somali Community. This could be included in the work plan for the Community Engagement team in Idea Stores to undertake outreach with Somali organisations and could be achieved within existing resources. With an additional £19k per annum for two years, the Community Engagement team would be able to recruit a specialist community engagement officer (0.5 FTE) to undertake 40 one to one assessments targeting the Somali community.
- 3.17 Recommendation 17 relates to support to help Somali young people into jobs. Within existing resources the careers services will work with 16 – 19 year olds who are not in work to access jobs, training and / or further education opportunities. This would include referrals to careers guidance to help them develop and deliver individual action plans. This might include assistance with CVs, developing employability skills, interview techniques or brokerage on to opportunities, such as apprenticeships or traineeships. With additional funding, the Economic Development service could procure a work taster / work experience programme for school leavers and new graduates. This would offer 6 month paid internships for 24 – 30 (12 – 15 per year) young people within Canary Wharf and other companies and include provision of coaching and mentoring support to this group. This would require additional resources of £45k per annum for two years to target groups with the lowest employment rates in the younger population.
- 3.18 Draft recommendations were shared with members of the Task Force in April 2016. A further meeting with the community was held in October 2016 to review the full action plan. Comments have been incorporated into the body of the report where appropriate. Some additional areas of activity have been identified by the community and these are set out in paragraph 1.10 of the report. There is a commitment by the Mayor and the Members leading the review that there will be ongoing community engagement on the delivery of the action plan and that would provide the scope for looking further at the issues identified.
- 3.19 This will be taken forward through the development of terms of reference for a reference group with a view to quarterly monitoring and review meetings, which would report directly back to the Mayor. In addition, there would be a wider community event to report back on the progress of the Task Force action plan one year after publication, chaired by the Mayor.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 The report makes 23 recommendations and the draft action plan attached to the report sets out the proposed actions.
- 4.2 Whilst the action plan makes reference to actions being delivered within existing resources or requiring additional resources, these resources are not fully quantified or as yet identified. It is therefore necessary to ensure that the resource implications of the action plan are clearly set out before the recommendations are progressed, so that the actions being taken achieve the intended outcomes, are cost effective and represent value for money. Any additional resources required to deliver the recommendations will need to be considered as part of the council's Medium Term Financial Strategy.

5. LEGAL COMMENTS

- 5.1 The public sector equality duty ("PSED") pursuant to section 149 of the Equalities Act 2010 applies to all decisions made by public authorities, whether those decisions have individual or general effect.
- 5.2 The aim of PSED is to embed equality considerations into the day to day work of public bodies, so that they tackle discrimination and inequality and contribute to making society fairer. The duty is to have due regard to the need to (a) eliminate unlawful discrimination; and (b) advance equality of opportunity, and (c) foster good relations, between people between people who share those protected characteristics and those who do not.
- 5.3 The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 5.4 The term 'due regard' means consciously thinking about the three (3) aims of the general duty as part of the decision-making process. This means that consideration of equality issues must influence the decisions reached by public bodies and which includes how they design, deliver and evaluate services.
- 5.5 The Somali Task Force was set up by Cabinet to review the issues faced by a community group with high levels of need re is no duty to carry out an equality analysis. This is fully compatible with the PSED and the Task Force recommendations assist the Council to:
- eliminate discrimination;
 - tackle inequality;
 - develop a better understanding of the community it serves;
 - target resources efficiently;
 - adhere to the transparency and accountability element of the Public Sector; and
 - meet legal compliance and the duty.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 This report focuses specifically on the Somali community. The Task Force reviewed areas where outcomes for Somali residents are comparatively lower than for other groups to identify ways to improve. In this respect, tackling inequality was a key focus of the group. The Task Force also considered the importance of community leadership, capacity building and fostering good relations between groups. The recommendation for a community hub specifies that it should have a focus on meeting the needs of the Somali community but that it would also be open to the wider community.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 The recommendations in this report aim to secure continuous improvement for the council, as required under its Best Value duty. Reviewing provision with a focus on a community group with high levels of need and who face challenges in accessing council services will contribute to increased effectiveness and delivery of the Councils objectives, including discharging its duties under the Equality Act 2010.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 There are no direct sustainable actions for a greener environment arising from this report.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 There are no immediate risk management implications arising from this report.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 9.2 There are no immediate crime and disorder reduction implications arising from this report. The recommendations that relate to improving representation from the Somali community within the Community Safety workforce should help to meet Community Safety objectives.

11. SAFEGUARDING IMPLICATIONS

- 11.1 There are no immediate safeguarding implications arising from this report.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE

Appendices

- NONE

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

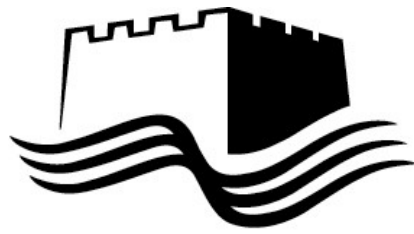
- NONE

Officer contact details for documents:

Or state N/A

Somali Task Force

DRAFT REPORT



TOWER HAMLETS

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Acknowledgements

The Task Force would like to thank the officers and partners that supported this review. The views and perspectives of all those involved have been fundamental in shaping the final recommendations. We hope this report continues the work to improve outcomes for Somali residents.

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Foreword

The Somali community in Tower Hamlets is a vibrant and important part of our borough but we know from the council's own data, that Somali residents are more likely to experience poorer outcomes in key areas such as employment, health and housing.

When the Mayor took office he set up the Somali Task Force to develop new way for the council to address the specific challenges faced by Somalis in Tower Hamlets.

The Task Force membership was drawn from across the local Somali community and heard the views of many local people. We then worked with services across the council to identify opportunities to improve services and to draw up this action plan.

We heard that many Somalis faced significant barriers when trying to access local services and jobs which prevented them from achieving their potential. The Task force also found a need to build more capacity for the community to speak out on issues which affect them. The action plan we have drawn up, in collaboration with the local community, starts to address these issues and to break down many of the barriers which we were told were holding some Somalis back from making the most of council services.

The action plan proposes a new hub for Somali residents to access a wide range of council services from as well as improving access for Somali speakers to other council services. We will invest in a new paid internship scheme offering work experience placements for young people, and support a new community leadership development programme supporting Somali residents to better engage with the borough's community groups and organisations. There are also a wide range of other proposals we will implement to strengthen the support given to and the stake held by Somalis in our community.

In a time of reducing resources, it is more important than ever to tackle inequality and challenge barriers which prevent people accessing council services. Our ambitions are clear, to support the local Somali community to have fair access the opportunities and services in our borough, this action plan is a key part of that process.

We would like to thank all of the members of the Task Force for all of their work and contributions, as well as all of those in the community who gave their time and thoughts to this process.

This report is the first stage of what we hope will be an ongoing process and we look forward to working with local residents to implement the recommendations.

Mayor John Biggs

Councillor Sirajul Islam
(Co-Chair)

Councillor Amina Ali
(Co-Chair)

1. Introduction

- 1.1. There are records of Somali migration to the UK dating back to the 1880s. They are mainly of Somali men working for the British Merchant Navy who settled in major port towns and cities around the UK. In Tower Hamlets the evidence of a Somali community pre-dates World War I and was largely of Dockers, some of whom were later joined by their families. A second wave of settlement took place during the 1950s as people came to work in the steel and coal industries. The next most significant migration period, in terms of total numbers of people arriving, was in the 1990s as a result of unrest and civil war in Somalia. At that time people from Somalia became one of the largest refugee communities in London. The 2011 Census shows that Tower Hamlets has the 7th highest proportion of Somali born residents in London. While migration levels from Somalia to the UK are in decline there is a growing second and third generation UK born Somali community.
- 1.2. Current data on the size and profile of the Somali population in the borough has its limitations. The most important population information available in the UK is Census data. However Censuses to date have not included Somali as an ethnicity; the data we do have is derived from 'country of birth' information. From this we estimate that the Somali population is between 2 – 3% of the borough total: about 5,500 – 8,000 people. The Somali-born population is based largely in the east of the borough, in the historical wards of East India and Lansbury; these are also areas of relatively high deprivation as evidenced in the latest Indices of Multiple Deprivation (2015). Administrative data indicates a higher proportion of Somali families (78.3%) in receipt of council tax benefit than the average figure for the borough. In addition, almost half (48.6 per cent) of Somali families are living in social housing, lower than that for Bangladeshi families (57.8 per cent) but higher than for White British families (20.6 per cent).
- 1.3. Outcomes for Somali residents are poorer than other groups across key areas of health and wellbeing, housing and employment. Despite a number of engagement and research projects to investigate and improve outcomes, there remains a widespread sense of frustration at a lack of progress and action to address the challenges amongst Somali residents.
- 1.4. Some Somali residents have said the low levels of Somali representation within local public services (including the council and NHS) can lead to a lack of understanding of cultural issues and make some members of the community feel marginalised from mainstream support. This was described as a factor behind a lack of trust and confidence in services to be responsive and this was often exacerbated for those with literacy or language barriers.
- 1.5. The Mayor and Cabinet in Tower Hamlets identified a need to better understand the challenges in narrowing the gap in outcomes for Somali residents. In September 2015 the Mayor established the Somali Task Force to engage Somali residents and review areas of persistently poor outcomes.

- 1.6. The council is also facing the most significant financial reductions in modern history. A key approach to date has been to identify savings by rationalising and mainstreaming services whilst taking into account the impact on key equality groups and mitigating any adverse impacts; meaning that future provision should include the capacity and flexibility to meet diverse needs. This will be a key area of monitoring as savings continue to be realised. The Task Force provides a further opportunity to test issues relating to mainstreaming services for community groups who are often most in need and can face access barriers.
- 1.7. The Task Force was chaired by Deputy Mayor, Cllr Sirajul Islam, Cllr Amina Ali and Cllr Amy Whitelock-Gibbs has also been assigned responsibility for the delivery of the action plan. There were four thematic review and discussion meetings which considered areas that were of community interest and / or where on average there are significant differences in outcomes for Somali residents compared to other communities.
- 1.8. In order to facilitate wider involvement, community representatives were part of an open membership reference group. This was to allow people to participate in the themed discussions that were of most interest to them. During these sessions, members of the Task Force reviewed information on the performance of services and projects, as well as good practice examples of service provision. The group scrutinised the evidence and shared community perspectives on the different themes to inform how support and services could be improved in the future.
- 1.9. Draft recommendations were shared with members of the Task Force in April 2016. A further meeting with the community was held in October 2016 to review the full action plan. Comments have been incorporated into the body of the report where appropriate.
- 1.10. At the October meeting there were a number of people who were attending a Task Force meeting for the first time and they raised additional challenges faced by the community and ideas of how to resolve them. These included a request for reviewing the barriers to accessing services and any role that discrimination could be playing within this context. Community members also highlighted the need for culturally sensitive drug detoxification programmes. Some members highlighted the need for arts and culture related provision and the need for skills and expertise to be developed within the Somali community in an area that is a growing and significant part of the local economy. Other attendees said there was a need to ensure the proposed community hub offered culturally tailored support but was also about greater cultural interactions with other groups and communities. A concern repeated from the earlier task force work was the need to identify better pathways into employment in the Council and public sector jobs. Within the discussion on health related recommendations the group highlighted young people's mental health services and dementia (need for greater awareness among families) as growing problems within the Borough. Participants also suggested ideas for pursuing integrated work with Job Centre Plus to identify ways to enable people on JSA to undertake ESOL and other training. People were concerned about the impact of welfare reform on already stretched household incomes. Somali residents affected by these changes were

said to potentially be unable to continue with tuition support for young people with a large number of people on low pay. Another member suggested that social services and care related support often got conflated with the services role in child protection and safeguarding and created a mistrust about wider social care services. Members of local women's groups highlighted the need for a focus on women and digital inclusion support through the proposed hub. One of the Members of the Somali Task Force also suggested inclusion of social prescribing activities within the hub.

- 1.11. A number of people attending the meeting also stressed the need for an ongoing reference group whose role would be to hold the council to account on the delivery of the action plan. This will be taken forward through a fuller development of the terms of reference for a steering group with a view to quarterly monitoring and review meetings with the group, and a report to the Mayor.

2. Recommendations

2.1 This report makes twenty-three recommendations with a focus on three key priority areas of actions covering improving access to services including through a 'service hub' approach, skills development and jobs support and capacity-building and empowerment. The recommendations cover improvements to data collection, community engagement, health and social care, youth services, community safety, educational attainment, employment, housing and welfare reform. The recommendations include calls to improve representation of the Somali community within the workforce, assist young people into relevant careers, and to help support community resilience.

Data and Access and Engagement

- R1 The council improves data collection of Somali as an ethnicity to better understand residents' needs and priorities across all services.
- R2 The council helps to build the capacity of Somali residents in the borough.
- R3 The council develops a hub approach to key services to improve access and target key areas where the gaps in outcomes are greatest.
- R4 The council identifies ways to improve the involvement of Somali residents across local consultative forums and community engagement groups.

Health and Social Care

- R5 The council helps to improve access to information and advice services related to social care including reviewing take up and usage by Somali residents.
- R6 The council identifies ways to promote recruitment and retention of Somali staff particularly in health and social care services.
- R7 The council commissions targeted mental health services for Somali women.
- R8 The council continues to deliver a public health campaign to improve the take up of the MMR vaccine within the Somali community taking into account the barriers identified through Task Force discussions.

Youth Services

- R9 The council undertakes outreach and engagement work to improve access and use of youth services by Somali young people.

R10 The council improves its understanding of the key issues facing young Somali people.

Community Safety

R11 The council seeks to increase the number of Somali staff in Community Safety and Youth Service support roles.

R12 The council reviews how well domestic violence services are meeting the needs of Somali women.

R13 The council commissions a needs assessment of substance misuse within the Somali community.

Educational Attainment

R14 The council supports improvements in schools to better meet the needs of the Somali community.

R15 The council continues to promote teaching as a career pathway to under-represented groups by raising awareness about support schemes and relevant careers advice.

Employment

R16 The council increases the take up of English for Speakers of Other Languages (ESOL) from within the Somali community.

R17 The council provides practical mentoring support focussed on building knowledge, networks and employment-related soft skills to help Somali young people into jobs.

R18 The council delivers self-employment support focussed on market trading opportunities targeting the Somali community.

R19 The council promotes wider understanding of different career options including jobs in Health and Social Care, Childcare and apprenticeships as pathways into work.

Housing and Welfare Reform

R20 The council improves the accessibility of information about the online bidding system for social housing e.g. written content in relevant local media and information sessions.

R21 The council explores having Somali language support within the Housing Options service.

- R22 The council invites a community representative(s) from the Somali Community to sit on the Welfare Reform Task group to increase knowledge and understanding of the impact of forthcoming changes to welfare.
- R23 That the council improves awareness of information and advice services related to Welfare Reform.

3. Data and Access and Engagement

- 3.1. As highlighted in the introduction, there are difficulties in developing an accurate profile of the Somali population because of the limitations of the national Census questionnaire. Somali was not listed as a separate ethnic group in the Census and when responding to ethnicity it is possible that Somali residents ticked either the *Black African* box or the *Black Other* category. The council estimates of the Somali population is based on country of birth data as a proxy for ethnicity which suggests the Somali population is between 2-3% of the total population, equating to 5,500 to 8,000 people (based on a Somali born population of 2,600).
- 3.2. This figure was challenged by some members of the Task Force who believe that the Somali population is much larger than the council estimate because of widespread data recording problems. Identifying ways to improve data collection is an important issue for service planning and delivery; it can be more difficult to match service provision to need where the information is inadequate. The council will look to identify opportunities to improve data collection in key areas of public service provision and will continue to lobby for Somali to be included as an ethnicity category in future Censuses.
- 3.3. The council has also commissioned more detailed Census 2011 datasets from the Office for National Statistics to improve our understanding of the profile of the Somali community in terms of household characteristics, labour market participation, attainment, qualifications and health.
- 3.4. A consistent theme identified by Task Force members was their experience of difficulties in accessing services. This ranged from feeling that a service is 'not for them' through to a perception that they are likely to face discrimination when they do so, as well as tangible barriers posed by language issues or a lack of awareness about how or where to get help. A number of the Task Force members suggested that a physical hub that included services focussed on the Somali community would support informing residents and access to services, as well as encourage Somali residents to know about and use the full range of services available more widely.
- 3.5. Whilst we know there are some areas where outcomes for Somali residents are comparatively poor, it is not possible to fully quantify the extent of need because of the gaps in equality monitoring for Somali as an ethnicity in both national and local data sets. The reported lack of confidence amongst some Somali residents in using services could also exacerbate data collection issues – and pose an additional challenge to improving outcomes. This report therefore includes some overarching recommendations to directly improve access to and engagement with services alongside longer- term recommendations for improving data collection and needs assessments.
- 3.6. Some of the Task Force members felt that there are still very few members of the Somali community engaged in local consultative and engagement forums and

that improving participation in these areas would help raise issues relating to community needs.

- 3.7. As lack of data, access to and engagement with services were raised as cross-cutting issues throughout the review meetings, recommendations relating to these areas are grouped below.

Recommendation 1

The council improves data collection of Somali as an ethnicity to better understand residents' needs and priorities across all services.

Recommendation 2

The council helps to build the capacity of Somali residents in the borough.

Recommendation 3

The council develops a hub approach to key services to improve access and target key areas where the gaps in outcomes are greatest.

Recommendation 4

The council identifies ways to improve the involvement of Somali residents across local consultative forums and community engagement groups.

4. Health and Social Care

- 4.1. In the first thematic session, the Task Force considered what the needs of the Somali community are in relation to social care. This included a strong focus on the implications of the Care Act for Somali residents. The Care Act brings together and updates the law relating to social care. It details the council's obligations in supporting residents, including care and support needs whether they are in their own home, in other types of housing (e.g. supported or extra care housing) or in a care home. Moreover, it sets out what local authorities are required to do if they are aware that someone is caring for a family member or friend and needs support. The Care Act also changes the rules about who qualifies for support from the local authority, gives residents the right to advocacy support and challenge decisions, and for their care to be reviewed if they feel this is necessary. As well as introducing new measures, the Care Act puts into law a number of elements that the council has already implemented, for example residents can now request a personal budget if eligible to receive one. With these substantial changes, the council needs to ensure access to services is improved for all communities and that it can meet a diversity of needs.
- 4.2. Task Force members reported that many residents are not aware of the Care Act and its implications. They identified language barriers as a key challenge for some in the Somali community in understanding the Care Act and accessing the services that they are eligible to receive. The Task Force felt that the council needs to raise awareness of where residents can access support services and secure appropriate advice, including on the impact of the Care Act on service users.
- 4.3. In discussing the wider social care needs of Somali residents, members of the Task Force identified a lack of digital access and poor literacy levels as significant barriers to accessing services, especially for older people.
- 4.4. The Task Force also highlighted the importance of better representation of the Somali community in roles and jobs within public and third sector services, as a key way of overcoming barriers for the Somali residents.
- 4.5. The Social Care session was followed by presentations from the Clinical Commissioning Group and Public Health teams. These focused upon areas of health need and interventions that had been identified as key issues for the Somali Community.
- 4.6. The Clinical Commissioning Group provided an overview of activities that were focussed on engaging with, and improving health outcomes amongst, the Somali community. For example, a bursary scheme that was started in 2013/14 led to research on the needs of elderly Somali men and a project with Age Concern to raise awareness of mental health, and specifically dementia, within the Somali community. In 2014/15 projects included: a targeted self-management service, an FGM awareness raising project, and a community health services review. A focus for 2015/16 was on commissioning work to support voluntary organisations working with the Somali community.

- 4.7. In 2015 the CCG ran an event which focused on Somali women and considered issues such as mental health, advocacy, integrated care, maternity services and long-term conditions. Key concerns, expressed at this event, included representation of the Somali community within the workforce, advocacy and interpreting needs that restrict access to care, ensuring both Somali men and women have equal access to services, a need for integrated care and ensuring the community is engaged in a meaningful way. The information from the event is informing commissioning of health services in 2016/17.
- 4.8. CCG lead officers also highlighted some of the work on improving employment rates within the Somali community. For example, Mulberry Girls School is being set up as a university technical college which will train local people to become involved in health and social care; this is being supported by the CCG. A key finding from the refresh of the CCG Equality and Diversity strategy is the need to improve representation on their Maternity Service Liaison Committee. This was also an issue considered by the council's Health Scrutiny Panel 2016.
- 4.9. The Task Force explored key health care issues facing the Somali community. Members of the group identified particular challenges for some residents in accessing primary care because of the lack of Somali language support in GP practices.
- 4.10. The Public Health service presentation focused on mental health, the uptake of the MMR vaccine and Vitamin D deficiency. In addition, issues relating to loneliness and mental health were identified as having a significant impact on Somali women. Somali residents use voluntary sector mental health services five times more than other groups. The Task Force considered that mental health issues amongst Somali women may be related to other issues such as unemployment.
- 4.11. MMR vaccination uptake is lower amongst Somali residents than in other communities. There is a widespread perception amongst many in the community that the vaccination is linked to autism. The Task Force members described the concerns related to autism within parts of the community, potentially leading to autistic Somali children not accessing all the care available to them.
- 4.12. Another key health challenge within the community is vitamin D deficiency. Public Health has launched a project to address this issue and is promoting outdoor activities to groups at greater risk, as well as issuing guidance to GPs and other health providers.
- 4.13. In the subsequent group discussions, the Task Force highlighted issues relating to diabetes and obesity which significantly affect many Somali residents, and identified Alzheimer's as an increasingly significant concern. Members of the Task Force also discussed the stigma around HIV and FGM amongst some in the Somali community which needs to be tackled. The group also felt that, in relation to FGM, the attention the issue receives is disproportionate to the scale and prevalence of the problem and that it can negatively stereotype the Somali community. There is a high degree of mistrust and confusion over how maternity

services, GPs and social care services respond to FGM and the new guidelines to risk assess children born to mothers who have had FGM. The Task Force felt that, given the sensitive nature of the subject, it is essential that Somali workers are actively involved to overcome the mistrust of some services within the community and work with victims of FGM.

Recommendation 5

The council helps to improve access to information and advice services related to social care, including a review of take-up and usage by Somali residents.

Recommendation 6

The council identifies ways to improve recruitment and retention of Somali staff particularly in health and social care services.

Recommendation 7

The council commissions targeted mental health services for Somali women.

Recommendation 8

The council continues to deliver a public health campaign to improve the take up of the MMR vaccine within the Somali community taking into account the barriers identified through Task Force discussions.

5. Youth Services

- 5.1. Some members of the Task Force felt that a lack of youth provision contributed to young people becoming involved in anti-social behaviour and potentially made them more vulnerable to extremism. The available data on access to youth services suggests that there is good engagement of Somali young people. For example, in 2014/15 7.5% of young people engaging with the Youth Council were Somali. There are also some specific services for Somali young people including *Raaxo*, which delivers drop-in based youth provision every Wednesday and Thursday evening. Sessions consist of workshops, sports, discussions and other educational activities. There is also *Urban Adventure Space* which delivers outdoor education and adventurous activities to Somali young people. This programme balances adventurous activities such as climbing and canoeing with informal discussions, educational workshops and information sessions.
- 5.2. It is important to highlight that youth service provision is open to all young people from all backgrounds. It was raised that some young people may be reluctant to participate with mainstream youth services or they are not encouraged to go by their families. Task Force members highlighted issues with groups of young Somali people congregating near Mile End Station and a particular lack of services in that area. Members of the Task Force requested that the council consider options for making support available in Mile End to discourage young people from low level anti-social behaviour activities.
- 5.3. There are youth centres across the borough accessible to young people across all communities. However, there is a need to look at the extent of take up and use by different community groups and ways to attract young people from the Somali community who are under-represented in these settings. Task Force members were concerned that a lot of young girls feel excluded from using the current provision of youth clubs for cultural reasons, and there is a risk that this leaves them isolated. Members of the Task Force were keen to consult young people to identify their needs and concerns and the barriers they perceive in accessing services, with a specific focus on ensuring there is appropriate provision for girls.
- 5.4. The Task Force emphasised the need for increased outreach and engagement work to support participation by Somali young people. The Task Force felt that the council needs to improve their understanding of the key issues facing young Somali people. In addition, staffing provision only allows Urban Adventure and Raaxo to run for 1 or 2 days a week; some Task Force members suggested that there is a need to increase this provision to operate every day.
- 5.5. While there is a willingness amongst young Somali people to become youth workers, some members of the Task Force felt that they face barriers in access to training and jobs. The Task Force felt that they could identify people to complete the required youth worker qualifications but that the council needs to highlight pathways and develop programmes to get more Somali young people into services that work with young people. It was suggested that volunteering should be used to encourage Somali young people into youth work.

Recommendation 9

The council undertakes outreach and engagement work to improve access and use of youth services by Somali young people.

Recommendation 10

The council improves its understanding of the key issues facing young Somali people.

6. Community Safety

- 6.1. Community safety and crime are areas of concern for many within the Somali community. It was noted that whilst domestic violence is an issue affecting Somali residents, there are currently no Somali members of staff working in this area to support women in need. The Task Force requested that job vacancies, particularly those supporting Somali service users, should be advertised using approaches that will be accessed by Somali residents, such as Somali TV and press, and community centres.
- 6.2. The Task Force considered youth offending and concluded that services could be improved through better awareness raising of Khat issues, improved collection of monitoring data within the Youth Offending Team, and an increased number of Somali speakers within the service. Khat-use is a significant problem for some Somali residents and the Task Force would like to see it addressed more rigorously in the council's Drugs and Alcohol strategy and through the substance misuse needs assessment.
- 6.3. Some members of the group expressed their concern over the number of young Somali men in the criminal justice system; this is hard to quantify as accurate data is not available. Task Force members were also concerned that recent changes to the law around joint enterprise could potentially lead to many more Somali young people entering into the criminal justice system. Members of the task group were keen to improve relationships with the police as a preventative measure.
- 6.4. The need for improved communications, to support Somali residents to raise their concerns with police officers, was raised. A Somali directory listing key Somali workers, organisations and contacts was developed approximately 10 years ago; it was suggested that this could be updated. Better access to information and services could also be supported through the development of a single point of contact in relation to community safety and youth services; such a resource could be included within a hub of community services as highlighted in Recommendation 3 for example.

Recommendation 11

The council identifies ways to improve recruitment of Somali staff in Youth Service and Community Safety support roles.

Recommendation 12

The council reviews how domestic violence services are meeting the needs of Somali women.

Recommendation 13

The council commissions a needs assessment of substance misuse within the Somali community.

7. Educational Attainment

- 7.1. The Task Force considered the educational attainment levels of Somali children in comparison to other ethnic groups. Somali pupils make up approximately 4% of school rolls over the past 4 years, making the Black Somali pupil cohort the 5th largest single ethnic group at Tower Hamlets schools. Somali pupils are not disproportionately represented amongst pupils receiving SEN support. The numbers and proportions fluctuate from year to year, but a four year average shows that Somali pupils have a lower proportion of pupils receiving some form of SEN support than for any other pupils of Black ethnicity, and a slightly higher proportion (0.7 percentage points) than the borough average for all pupils.
- 7.2. The characteristics of Somali children are broadly in-line with all other groups, apart from in the number of children in receipt of free school meals (FSM). Black Somali Pupils have significantly higher rates of FSM eligibility than any other ethnic group; in 2015 the rate was almost 20 percentage points higher than the borough average. The figure is however declining at a greater rate than it is for other groups.
- 7.3. The pupil premium means that children on free school meals attract additional resources for the schools that they are enrolled in. It allows the schools to be focused in how they provide support to children who may have less access to resources outside of school. Task Force members wanted to see how the pupil premium was being used to benefit Somali children, the options for improving parental engagement and take-up of after school activities and use of Somali speaking staff to support families through these additional funds.
- 7.4. In terms of attainment, children from the Somali community are performing as well as or better than children from most other communities. At Key Stage 4 in particular, children from the Somali community are performing very well, better than their peers from other ethnic groups who are in receipt of FSM. On a 3 year rolling average of attainment, Black Somali pupils have had higher average attainment in recent years than pupils from other Black backgrounds and higher attainment than the average for all other pupils.
- 7.5. Achievement is reported against a whole range of different ethnic groups; however within early years services there is no Somali category, the category is *Black African*. At Key Stage 2 level, Somali children are in line, or ahead of children from other communities in both mathematics and reading. Additionally, a key indicator for secondary school readiness is the attainment of level 4b or above in Grammar, Punctuation and Spelling (GPS); this indicates whether a child is on the path to obtaining 5 A*-C GCSEs including English and mathematics. In 2015, Tower Hamlets was ranked second nationally in its achievement of GPS, and Somali children scored 80.5%, second only to Asian children who scored 83.8%.
- 7.6. In education there has been an improvement in attainment levels for Somali pupils achieving 5 A*-C including in English and maths: it was 64.2% in 2014 compared to the borough average of 59.4%. Of the 358 young people who were

not in education, employment or training only 8 (2%) were Somali at the time of the review session. However, success in schools has not yet translated into successful employment outcomes. There is a higher than average proportion of 25 – 49 year olds and pensioners in the Somali born population. Somali-born Londoners have the lowest economic activity rates, and highest unemployment rates, of all migrant groups. Data from the 2011 Census about the occupations of Somali-born residents shows that many of those in work were in lower skilled jobs.

- 7.7. The most recent full year of information available for school exclusions (2013/14) shows that the rate of exclusions per 100 children at secondary schools was higher for Black Somali pupils (at 8.3 exclusions per 100) compared to the borough average (6.5), although there are much higher rates for some other groups. The rate for Somali children may be affected by the much smaller numbers of Somali children in secondary schools.
- 7.8. Task Force members noted the impact of having Bangladeshi teachers on the improved attainment of Bangladeshi children in the community and wanted to see more Somali teachers within schools. The service outlined the availability of Department for Education and central government funding to support people to become teachers; members of the Task Force stated that many people in the Somali community were not aware of this. Some members of the Task Force felt that there was an issue with a lack of Somali teaching assistants and that a lack of Somali speakers in schools is a barrier when there are problems that require family engagement and communicating effectively with parents.
- 7.9. Task Force members felt that teaching assistants, recruited using the Pupil Premium, could include Somali speaking staff. They also felt that there should be a mechanism to consult with parents over the best way to spend the pupil premium. Additionally, it was suggested that there needs to be increased representation at parent governor levels as Somali residents are underrepresented, and that there needs to be an increased transparency in the recruitment process for governors. Some parents lack a basic understanding of the education system such as how the grading system works, and are unaware of the right type of questions to ask to support their child or ensure they are not being bullied. To that end, the Task Force were keen for schools to do more to engage with parents and felt that further improvements could be made through appointing more Somali staff and governors.

Recommendation 14

The council supports improvements in schools to better meet the needs of the Somali community.

Recommendation 15

The council continues to promote teaching as a career pathway to under-represented groups by raising awareness about support schemes and relevant careers advice.

8. Employment

- 8.1. Within the Somali community there are high levels of long term unemployment within the older, primarily Somali-born population. Whilst educational achievement levels for Somali children are higher than the average, this has not yet translated into employment outcomes. This may be because second and third generation Somali residents – who have had a UK education – are yet to build networks with people who are in work and can provide information and advice that often supports getting into jobs. The employment issues faced by this group are, in any case, different from issues faced by first generation Somali residents.
- 8.2. The primary source of data for Somali employment is from the GLA. Somali residents have a lower economic activity rate (47%) compared to the population in general (67%). Amongst economically active groups, there is a large proportion in relatively low paid work. According to GLA figures, only 5% of the Somali population across London occupy managerial positions, as opposed to 26% who occupy elementary type positions and 15% in caring professions. With regards to use of Skillsmatch, there is approximately 2,085 active clients at any one time, around 7.5% of the client base is of Somali origin (e.g. 160 clients).
- 8.3. Only 1.2% of the council workforce is Somali (66 members of staff). Just less than 1.3% of applicants for council vacancies were Somali (out of 5,600 applicants for council roles). However 13% of Somali applicants were successful compared to 9% of Bangladeshi and 15% of White English applicants respectively. This suggests perhaps a challenge in people identifying the council as a career pathway. There has been a decline in the number of Somali job applicants but this is in line with the decrease in jobs available within the council.
- 8.4. Some members of the Task Force identified a lack of employment networks within the community. This can mean that younger people do not have many role models or contacts to find out about jobs or to get help with application forms, references and interview skills. Other members of the Task Force suggested that Somali residents, who faced language barriers, could benefit from support to become self-employed. For example, assistance to take up market trading where the requirements for English language skills may be at a lower level compared to office based roles.
- 8.5. Apprenticeships were an area cited where there is a significant lack of awareness, and absence of role models, within the Somali community. There is currently a national drive to support apprenticeships, and there is an imperative on local authorities to recruit a significant number of apprentices over the next five years: a target of 2.3% of the overall workforce. While the council has targeted outreach activity for the apprenticeship programme to Somali young people, this had yielded only two Somali apprentices out of the current sixty. The service outlined challenges with engaging Somali residents and the lack of understanding of what an apprenticeship is and the benefits it holds as a career option. There is a perception that apprenticeships are linked to manual labour jobs, and people are unaware that there are roles in areas such as engineering,

law, health, education and ICT. The council is looking to improve awareness through outreach and engagement work with the Somali community.

- 8.6. The council is also working with Jobcentre Plus to support people who face multiple barriers to employment. A number of programmes at level 1 (i.e. traineeships) have pathways into employment. For example, a pathway will be tailored with skills and qualifications that will allow somebody to access a career in health and social care.
- 8.7. Some of the members of the Task Force identified the reduction in Mainstream Grant (MSG) funding, particularly in relation to training and employment support, as a problem for the Somali community. In the MSG programme 2015-18 funding awarded directly to Somali-led organisations was reduced by 65%. More support is needed to provide Somali organisations with skills and knowledge relating to completing applications for grant funding. There is a basic lack of understanding of how to successfully apply for MSG for some Somali-led organisations, and this puts them at a disadvantage. These difficulties may be compounded by language and literacy barriers faced by some groups within the community.
- 8.8. Job vacancies and apprenticeships are not advertised in places which are accessible to many in the Somali community. In addition, access to employment is further restricted through the lack of Somali speakers within job centres who can signpost people to all the different programmes available. Some members of the Task Force felt that the council needs to work with JobCentre Plus and other third sector organisations to encourage them to recruit more Somali staff. The council is currently changing its employment service for residents who are out of work. This will include moving towards delivering a much more integrated employment service focussed on tackling barriers that prevent people from accessing jobs.
- 8.9. There was a feeling amongst Somali Task Force members that lessons can be learnt from the progress made by the Bangladeshi community in this area. The council had a Workforce to Reflect the Community strategy which aims to ensure the workforce is representative of the community it serves. When the first strategy was developed in 2002, there was a focus on the Bangladeshi community and their representation within the council, including in senior positions. This new Workforce Strategy offers an opportunity to provide a focus on the Somali community and set key targets for this community and other underrepresented groups.

Recommendation 16

The council increases the take up of English for Speakers of Other Languages (ESOL) from within the Somali community.

Recommendation 17

The council provides practical mentoring support focussed on building knowledge, networks and employment-related soft skills to help Somali

young people into jobs.

Recommendation 18

The council develops self-employment support focussed on market trading opportunities targeting the Somali community.

Recommendation 19

The council promotes wider understanding of different career options including jobs in Health and Social Care, Childcare and apprenticeships as pathways into work.

9. Housing and Welfare Reform

- 9.1. The Task Force reviewed information on the impact of Welfare Reform on the Somali Community. Although we do not have accurate ethnicity data in this area we know that welfare reform is likely to be a pressing issue for some Somali residents.
- 9.2. Currently the benefits cap is £26,000 per year (£500 per week) for couples claiming benefits, and £18,200 (£350 per week) for single claimants. In January 2015 there were 501 families in Tower Hamlets subject to the cap and we know that larger families are particularly affected. The government has proposed a reduction to the cap, which will be £23,000 for couples and £15,410 for single claimants. It is anticipated that, when this change happens, 1,897 families in the borough will be impacted. The only viable root out of the cap is to secure employment which includes a minimum number of hours to be exempt from it.
- 9.3. The other significant reform which impacts on residents is the 'bedroom tax'. The bedroom tax is in effect a reduction in housing benefit for people who are considered to be under occupying their social housing accommodation. There are presently 2,106 households affected by the bedroom tax.
- 9.4. In addition to these reforms, there are also plans to introduce Universal Credit, which will merge several welfare benefits into a single benefit. The roll out of Universal Credit commenced locally in March 2015 however this was only for a small group – non-complex (single unemployed claimants) cases. A national roll out of the Universal Credit for all cases is a slower process and is set to commence in 2021. The council currently helps people who are struggling to meet housing costs through Discretionary Housing Payments. This is a fund provided by the government which the council tops-up, however it is not a long term viable solution to mitigating the impact of the benefit cap. The council has set up the Welfare Reform Task Group to provide a proactive response to these changes. The council is analysing data to target and inform residents and families who will be affected by these changes, and will deliver publicity and awareness activities in addition to employment and training advice to mitigate the impact the reforms will have.
- 9.5. Task Force members raised concerns about how the Somali community will be significantly impacted by these reforms, and are concerned that due to issues, such as language barriers and difficulty accessing information, there will be a lack of awareness of these changes and how they will impact some residents. It was suggested that the council should factor in how to meet the needs of older people on this issue. Many will not have reading and writing skills and intergenerational communication issues mean that children cannot always assist. There is a need for advocacy support using Somali speaking staff to assist older people.
- 9.6. There are a range of housing challenges faced by many people in the borough and the Somali community, in particular, have difficulties including overcrowding, rent arrears and understanding the choice based lettings system.

- 9.7. The 2011 Census evidences overcrowding as a significant issue for many Somali residents. The majority of households (75%) with a UK-born household reference person had 0.5 persons per room. Households with a Somali-born household reference person had the highest levels with more than 1.5 persons per room. Analysis of households on the council's housing waiting list shows that approximately 2.1 per cent are Somali households.
- 9.8. Out of the 633 known Somali households on the housing waiting list, 296 required 3 bedroom or more properties. There is an Overcrowding and Over Occupying strategy and the council works with partners to try and help residents access homes which meet their needs. A key way to address this issue is by building larger homes and the Local Plan favours this. However, the welfare cap and changes to rent mean it is increasingly challenging to build larger homes which people can afford. The Task Force was concerned that too many Somali families are living in private accommodation which is not suitable for them. The way in which Somali residents register their ethnicity may lead to under reporting of overcrowding because many may have categorised themselves as Black African.
- 9.9. Aspects of housing need can be assessed by looking at the housing waiting list, although since 2011 only people who had lived in Tower Hamlets for 3 years are allowed to join. As of January 2016 there were 633 Somali residents on the waiting list, equating to 2.1% of overall applicants. Since April 2015 (to December 2016) a total of 1,849 homes were let, out of which 65 (3.52%) were to Somali applicants. At January 2016, the Council had 119 homeless applications registered from people of Somali origin.
- 9.10. The council has been operating a Choice Based Lettings system since 2002. Homes are advertised weekly and applicants have to register an interest. Recent changes to the system mean that if applicants refuse three offers they are demoted down the waiting list. There are a number of facilities built-in to this system to try and enable easy access for Somali residents. Telephone bidding lines are available in community languages, including Somali, and one member of the Housing Options team is a Somali member of staff. Where required, the service has the option to use the council's external provision of interpretation services and provide a Somali speaker. The most recent data from this system (April 2015 –December 2015) showed a total of 543,225 bids were made on 1,819 properties by 12,508 applicants. Of this number 19,862 bids (3.7%) were made on 1,730 properties by 438 applicants of Somali ethnicity. Despite usage numbers indicating that Somali residents access this system, the Task Force feels that there remains a lack of knowledge of how it works and what residents are required to do. For example, some members of the Task Force were unaware that households that are in rent arrears will not be offered a home. The Task Force was concerned that the figures suggesting Somali households received a fair and proportionate number of lets do not match up to the experience of some members of the Somali community. Some Task Force members reported difficulty using the online bidding system and would like to see written instructions developed to assist them.

Recommendation 20

The council provides information about the online bidding system for social housing to the Somali community, e.g. written content in relevant local media and information sessions.

Recommendation 21

The council explores having Somali language support within the Housing Options service.

Recommendation 22

The council invites a community representative(s) from the Somali Community to sit on the Welfare Reform Task group to increase knowledge and understanding of the impact of forthcoming changes to welfare.

Recommendation 23

That the council improves awareness of information and advice services related to Welfare Reform.

10. Tower Hamlets Homes: A case study of good practice

- 10.1. Tower Hamlets Homes (THH) was cited as an example of good practice in engaging with the Somali community. They were invited to present their work at the Housing and Welfare Reform session.
- 10.2. In 2011 Tower Hamlets Homes recognised that there was a high level of dissatisfaction with the services provided by THH amongst Somali tenants. To better understand the reasons for this, they undertook an analysis of the relevant data they held. This found, for example, that Somali tenants were more likely to be in rent arrears than any other ethnic group. THH also undertook a series of engagement events with Somali groups and individual tenants to better understand the causes of dissatisfaction. A number of barriers were identified for the Somali community which impacted the way they accessed services. Low literacy levels and language difficulties of some tenants restricted their understanding of the services which were on offer, the absence of Somali employees created a lack of trust and confidence in the services, and there was a lack of comprehensive data as ethnicity was not recorded as Somali.
- 10.3. In order to better understand the needs of Somali tenants, THH systematically analysed the complete list of their tenants. They identifying names and details that were suggestive of a Somali background and pursued each case individually to confirm they were Somali. THH found that they had 363 Somali tenant households – 4% of all THH tenants. 80% of Somali tenants were in receipt of housing benefit, and 63% of all Somali tenancies were in rent arrears.
- 10.4. THH's work highlighted that Somali tenants were twice as likely to be in rent arrears as White British tenants. 1 in 12 Somali households on housing benefit were impacted by non-dependent deductions. 1 in 20 Somali households on housing benefit were impacted by the bedroom tax. Somali tenants in receipt of housing benefit were 10 times more likely to be impacted by the Benefit Cap than White British recipients.
- 10.5. With regard to overcrowding, data showed that 18% of Somali households were overcrowded in comparison to 23% of Bangladeshi and 12% of White British households. Tower Hamlets Homes reviewed the data on Somali overcrowding: their workshops had identified many more Somali families who were in fact overcrowded and in housing need but not recorded as such. The workshops also identified that many Somali residents were not aware of how the Choice Based Lettings system works and were remaining in overcrowded properties without exercising the options available to them.
- 10.6. In addition, Tower Hamlets Homes developed a strong partnership with a local women's group called the Somali Integration Team and Ocean Somali Community Association. THH recruited dedicated Somali (speaking) officers to work with the community and encouraged Somali tenants to sit on their Scrutiny Panel and other engagement structures. THH also improved the way they communicate with the Somali community to tackle issues such as reporting a

repair or rent arrears. For example, they developed talking leaflets, improved written translation, used pictorial cards and provided Somali speaking officers. In order to tackle rent arrears, they worked in partnership with Ocean Somali Community Association (OSCA); an (OSCA) Somali support worker worked within the Rents Service once a week and conducted joint home visits if needed. Over 150 tenants were supported through this project, the average arrears per case reduced by £174.

10.7. The Task Force felt that many of the lessons from the Tower Hamlets Homes engagement project could be adopted by the council. For example, Directorates should be encouraged to undertake their own audit of the data they hold on the Somali community and work to address any gaps they may have. The Task Force suggested that teams across the council should seek to recruit Somali speaking workers and engage with Somali-led community groups to help engage with the Somali community, foster trust and encourage confidence in accessing services. Satisfaction levels amongst Somali tenants rose from 59% in 2009/10 to 82% in 2011 following completion of the engagement project.

Action Plan

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
Data Collection					
R1	The council improves data collection of Somali as an ethnicity to better understand residents' needs and priorities across all services	<p>This will be part of the drive to mandate equality monitoring across services and as a requirement within council contracts with external organisations with cases made for exceptions.</p> <p>Priority areas for improving data collection include housing and employment.</p> <p>This will be incorporated as part of Public Sector Equality Duty related publication of monitoring data.</p> <p>The Corporate Strategy and Equality Team will also work with services to establish baselines for key areas and develop metrics to monitor progress against the action plan.</p> <p>The Mayor and the Council will continue to lobby relevant national stakeholders to ensure Somali is included as an ethnicity in future censuses</p>	Shanara Matin , Corporate Strategy and Equality (CSE)	October – December 2016	Within existing budgets
Access and Engagement					
R2	The council helps to build the capacity of Somali residents in the borough	<p>A skills development programme that produces a Somali History Project with the objective of showcasing a positive community narrative and providing skills development in project management and in the arts and culture sectors. The project would be co-produced with the community and aim to have a lasting legacy.</p> <p>A support programme for residents participating as members of consultative and engagement forums in the borough.</p>	<p>Shanara Matin, CSE</p> <p>Steve Hill, Third Sector Team,</p>	October – March 2017	<p>Within existing budgets</p> <p>This would require</p>

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
			Resources		additional budget to be identified within the MTFS
R3	The council develops a hub approach to key services to improve access and target areas where the gaps in outcomes are greatest.	<p>The Council will develop a 'hub approach' of services and space for community groups to hire through one physical location. The hub will be accessible to all residents but have a focus on key services accessed by Somali residents. This will be linked to broader council proposals coming forward on community buildings. There will be a number of new community hubs established by the council, with the commitment is to establish one with a particular Somali focus, to overcome barriers to accessing services. (This is alongside improving access to all mainstream services).</p> <p>The Somali community focus of the hub will be on services for adults, including lunch clubs and health activities for elders, information and advice including on benefits and the Care Act, and links and referrals into council services e.g. employment and housing.</p> <p>Granby Hall has been initially identified as the potential hub location. This currently provides daily lunch clubs for Somali elders, as well as a pensioner group using another part of the building. The hub would build on these existing activities and sustain an offer for older people.</p> <p>The following services have indicated that they could utilise a hub at Granby Hall for:</p> <ul style="list-style-type: none"> • lunch club provision, including for women • health and wellbeing services - including services for older people that currently go into Mayfield House, and links to wellbeing hubs that are being set up in 	<p>Ann Sutcliffe, Service Head, Corporate Property and Capital Delivery (Property elements)</p> <p>Steve Hill Third Sector Service Manager (Hub development lead)</p>	April 2017	<p>Budget for capital works identified as part of community buildings strategy subject to Cabinet Agreement</p> <p>Further work needed to confirm the ongoing revenue budget for the hub.</p>

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
		<p>Ideas Stores and linked to Public Health Locality Managers</p> <ul style="list-style-type: none"> • Information and advice services, including in relation to welfare and the Care Act • Employment services linking to the Integrated Employment Service and pre-employment related training and support • Information sessions on choice based lettings policy, bidding, and council's obligations to those that are homeless, as well Allocations briefing sessions to Somali Advice workers • DAAT outreach work / referral service (Providence Row) either operating a formal satellite from Granby Hall or as a check-in point as part of outreach. • ELFT may be able to operate group keywork / psychosocial sessions from Granby Hall with service users engaged in treatment. <p>The exact configuration of the building, number of services operating from the hub and future governance arrangements will be determined in partnership with council teams and existing users of the building.</p>			
R4	The council identifies ways to improve the involvement of Somali residents across local consultative forums and community engagement groups.	<p>The service will encourage the engagement of Somali community members to key forums and to become Champions including for:</p> <ul style="list-style-type: none"> • No Place for Hate • Violence Against Women and Girls • DV Forum. <p>Through the Task Force and future reference group, members will be encouraged to lead by example and sign up</p>	<p>Shazia Ghani, Head of Community Safety</p> <p>Andy Bamber, Service Head, Community Safety</p>	September 2016 Current review of VAWG Steering Group members has meant extending invitation to local Somali organisations.	Within existing budgets

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
		<p>as champions, as well as identify and recruit other potential champions.</p> <p>A representative of the Somali community will be invited to be part of the Safer Neighbourhood Board.</p> <p>The Council will support a number of upcoming conferences with the Somali community, including an event in October and in December.</p> <p>There is ongoing work to engage with the Somali community and to encourage attendance at full range of forums and meetings. Review of DVF Membership is on this quarter's agenda – the aim is to review members and ensure that there is appropriate representation from across the community. It is hoped that this will be complete before the end of Q4.</p> <p>We also are raising the issue of Somali Representation at the next SNB Board to discuss a way forward and also support at ward panel level.</p> <p>The Somali Integration Team and Numbi Arts have been suggested by the community as further organisations to engage with for this recommendation.</p> <p>The service will review representation of communities at the Health and Wellbeing Board and through its outreach and engagement structures. The new Health and Wellbeing Strategy includes an important strand about Communities Driving Change around health – the group leading this will review how Somali representation can be better included. There is also consideration of a communities sub-group which would enable more community groups and members of</p>	<p>Somen Banerjee, Adults Directorate</p>	<p>Membership being reviewed to include representation from Somali community. This has been raised at the SNB Board and we are asking again through SNB and Ward Chairs to look to engage with the Somali population to look at how to engage.</p> <p>April 2017</p>	

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
		<p>the public to engage with the Health and Wellbeing Board's work, which would need to review how to engage a wide range of groups, including Somali people.</p> <p>Further mapping of relevant consultative and engagement forums will be undertaken as part of the Community Engagement Strategy.</p>	<p>Emily Fieran-Reed, Service Manager, Cohesion, Engagement and Commissioning</p>	<p>April 2017</p>	
Health and Social Care					
R5	<p>The council helps to improve access to information and advice services related to social care including reviewing take up and usage by Somali residents.</p>	<p>The service will ensure Information, Advice and Advocacy is available for Somali users through the monitoring of contracts, provision of accessible information and engagement of the Somali community. This will include promoting new initiatives to the community such as social prescribing.</p> <p>The council commission an information and advice service called Local Link. There are opportunities to publicise the service in public places around the borough. Based on the findings of the report the focus will be in Job Centre's, GPs, lunch clubs and places where we know there are Somali communities often access services most frequently.</p> <p>The service will monitor and capture data around Somali community access including the annual adult social care service user survey which is due Feb 2017.</p> <p>Digital Inclusion activities will include linking community groups to training and support to get online with a particular</p>	<p>Karen Sugars, Acting Service Head Commissioning and Health</p> <p>Barbara Disney Strategic Commissioning Manager , LBTH</p> <p>Shanara Matin, CSE</p>	<p>March 2017</p> <p>November 2016</p>	<p>Within existing budgets</p> <p>Within existing budgets</p>

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
		<p>- Scope potential for pilot of work placements with providers, such as Barts Health, for under-represented groups including the Somali community</p> <p>To improve pathways into social care the Service already requests commissioned providers ensure the recruitment and employee make up, including volunteers, is reflective and inclusive of Tower Hamlets' diverse community and will further specify short work placements offers.</p>	Karen Sugars, Service Head, Commissioning and Health	December 2017	
R7	The council commissions targeted mental health services for Somali Women.	<p>Public Health has procured and delivered the Flourishing Minds programme focussing on mental wellbeing and stigma reduction among Somali women -delivered by Somali Integration Team (SIT) – a local Somali women's led organisation.</p> <p>SIT have been successful in bidding for a new initiative through which Somali women will be placed at health centres as volunteers to increase access to primary care; SIT attribute this achievement to the FM project.</p> <ul style="list-style-type: none"> • The project coordinator is being trained as a Mental Health First Aid Instructor which will enable her to go on and deliver MHFA training within the Somali community • The project has trained up individuals with lived experience of mental illness to co-deliver the project - one Somali woman with mental illness has been delivering a mental health workshop to other Somali women, and it is anticipated that this will continue beyond the life of the funded project • Links have been made with other local organisations and Somali women are now regularly attending the 	Abigail Knight, Associate Director, Public Health Flora Ogilvie, Interim Associate Director, Public Health	December 2016	Within existing budgets

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
		<p>'Tree of Life' project delivered by ELFT</p> <ul style="list-style-type: none"> • A volunteering programme has been set up, with Somali women volunteering at a number of GP practices to help other Somali women to better access services • The Somali Integration Team are now thought to have a lot more capacity and knowledge on mental health that can help them to improve mental health of Somali women in the future 			
R8	The council continues to deliver a public health campaign to improve the take up of the MMR vaccine within the Somali community taking into account the barriers identified through Task Force discussions.	<p>Local MMR campaign incorporating issues raised within the Somali Task Force.</p> <p>Attendance at the London Immunisation Board who oversee the commissioning of the immunisation programme to make recommendations on having a London wide initiative to focus on the Somali population to encourage the uptake of the MMR using the learning from the local Tower Hamlets experience to increase the uptake of the MMR. There was interest from the board members and Consultant Lead on Immunisation will be looking at setting up task group to identify how to take this forward.</p> <p>We have continued to work with the local Health Visiting service to promote the MMR to the Somali families. They are working with using a DVD, which is being handed out, which has been produced in the Somali language to encourage families to get their young children vaccinated. This is also to be put onto YouTube to make it more widely available.</p> <p>General practices who deliver the vaccination programme in Tower Hamlets are regularly being informed about the MMR coverage levels for their practices to encourage work to improve the uptake of this amongst their registered population to increase MMR coverage</p>	<p>Abigail Knight, Associate Director, Public Health</p> <p>Flora Ogilvie, Interim Associate Director, Public Health</p>	<p>Completed</p> <p>April 2017</p>	Within existing budgets

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
Youth Services					
R9	The council undertakes outreach and engagement work to improve access and use of youth services by Somali young people.	<p>Outreach has been previously completed with a specific group of Somali young people in Mile End. In the interim delivery model the youth service is including detached work from all its 8 hubs and this is targeting equality groups that are currently under-represented in the service such as young women, white young people and specific target communities such as Somali. This is with the aim of attracting a more diverse range of service users into our centres and promoting integration and community cohesion.</p> <p>As part of the move to the interim model the service has relocated the Raxxo Somali Boys project from Harpley to Haileybury with full consultation with the young people and dedicated project staff.</p> <p>The service will be completing a restructure in 2017 and will aim to attract a more diverse staff group where any vacancies arise.</p>	Claire Belgard, Interim Head of Youth Services	Completed and Ongoing	Within existing budgets
R10	The council improves its understanding of the key issues facing young Somali people.	<p>The youth service has completed consultation which was open to all young people and is currently in a formal consultation process.</p> <p>The project lead for the Raxxo Somali Boys project has been asked to promote the current consultation to those attending the project so their views are included and reflected in the revised service.</p>	Claire Belgard, Interim Head of Youth Services	Ongoing Our collated youth offer, including targeted provision was published in time for the summer holidays.	Within existing budgets
Community Safety					
R11	The council identifies ways to improve recruitment of Somali staff	The service will review the evidence for a business case to recruit a Somali staff member to the Drugs Outreach Team.	Rachael Sadegh, DAAT	December 2016	Within existing budgets

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
	in Youth Service and Community Safety support roles.	<p>The service will highlight volunteering as a pathway into jobs and training programmes to the wider Somali community including Peer Champions and VAWG Champions, No Place for Hate Champions.</p> <p>The service will advertise job vacancies using approaches that are more likely to be accessed by Somali residents e.g. Somali TV, community centres, and Somali press.</p> <p>The service will explore options for increasing recruitment of Somali staff in other key frontline teams, such as THEOs and Rapid Response Team, where opportunities arise.</p>	<p>Clare Belgard, Interim Head of Youth Services</p> <p>Andy Bamber, Service Head, Community Safety</p>	<p>December 2016</p> <p>Ongoing</p>	
R12	The council reviews how domestic violence services are meeting the needs of Somali women.	<p>The service will undertake a needs assessment, and or consultation activity, to understand the issues faced by Somali women in need of domestic violence support.</p> <p>Regular meetings with local Somali groups for the FGM and Harmful Practices pilot in order to support Somali community members to talk about FGM and access support. This work can be built upon to include DV and ensure effective referral pathways are introduced that are appropriate for this community group to access current services.</p> <p>We continue to promote the VAWG champions project through intranet, VAWG and DV Forum, CSP, Partner messages, members bulletin and providers to have a far reaching approach. We also are targeting an information session during the 16 days of Action at local Somali Community Centres</p> <p>All domestic violence services are open to anyone</p>	Shazia Ghani, Head of Community Safety	December 2016	Within existing budgets

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
		experiencing Domestic Violence, including men and women. Linkages have been made with Somali targeted organisations such as OCSA, WHFS and Praxis to identify any specific needs. As part of the VAWG Consultation Exercise all communities were consulted on, including Somali women, to identify any particular needs around domestic violence support. Core services provided by the DV & HC Team are utilised by a cross section of the community, including Somali women.			
R13	The council commissions a needs assessment of substance misuse within the Somali community.	<p>The annual substance misuse needs assessment will include specific work with the Somali community. Current provision includes a link worker project with MIND. The new treatment system specifications will include provision for Khat users and will identify the Somali population as a target population.</p> <p>The service has commissioned new drug alcohol services which will commence on 31st October. The Somali community have been included as a target group within all 3 service specifications across referral / outreach, treatment and recovery support. The outreach / referral service will be subcontracting MINDTHN who have been responsible for providing the Somali link worker role to date.</p> <p>A new needs assessment will begin in January / February of 2017.</p>	Rachel Sadegh DAAT Manager	October 2016 March 2017	Within existing budgets
Educational Attainment					
R14	The council supports improvements in schools to better meet the needs of the Somali community.	<p>The council has specifically employed members of the Somali community within our advice and guidance services and will review how this is working for any areas for improvement.</p> <p>The council will work with schools with a higher proportion of pupils of Somali background to try and identify what might work best, including areas such as parental engagement and</p>	Christine McInnes Service Head, Education and Partnerships	Ongoing	Within existing budgets

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
		<p>take up of after school activities by Somali children.</p> <p>Exam results show Somali young people perform well, especially at GCSE level, but the service will explore initiatives to give greater visibility to achievements of this community and other under-represented groups. This would include building on work to celebrate achievements and promote role models within the Somali community to encourage other young people and build aspiration and pride, exploring mentoring and promoting access to higher education.</p> <p>The service will also consider how to improve representation of the Somali community among school governors, as a key community leadership role.</p>		October 2016	
R15	The council continues to promote teaching as a career pathway to under-represented groups by raising awareness about support schemes and relevant careers advice.	The service will deliver information and outreach activities to promote pathways into teaching to under-represented groups and continue to monitor representation of BME groups with teaching and teacher assistant roles within the borough.	Christine McInnes Service Head, Education and Partnerships	Ongoing	Within existing budgets
Employment					
R16	The council increases the take up of English for Speakers of Other Languages (ESOL) from within the Somali community.	<p>The Community Engagement team work plan will include soft targets for outreach with the Somali community.</p> <p>In addition, the service will engage an outreach member of staff to specifically link Somali community groups to provision across the borough. A 0.5 FTE Specialist Community Engagement officer would cost £17k per annum and an additional £2k would provide 40 hours additional assessments. It is recommended that the additional service</p>	Judith St John, CLC	<p>April 2016</p> <p>March 2017</p>	<p>Within existing budgets</p> <p>New Investment: £19k per annum for two years / £38k in total as a one off</p>


	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
		<p>is commissioned for two years to help ensure sustainable links are built to enable referrals and take up in the future.</p> <p>The service will set up a project to run trial bridging programmes into mainstream ESOL provision and also identify the barriers to participation to support the development of more effective strategies. The service will aim to deliver activities with the Integrated Employment Services so that participants could be directed to appropriate interventions across LBTH.</p> <p>For those further from the labour market, and likely to include residents within the older Somali population, the service will promote employment support services through outreach and by linking residents into pre-employment training that will be offered as part of the Integrated Employment Service Specific work would include:</p> <ul style="list-style-type: none"> • Referrals into the Integrated Employment Service • Outreach work with the Somali community to expand access to the Raising Aspirations programme • Exploring how to expand the Women into Health programme 	Andy Scott, Service Head, Economic Development	March 2017	<p>funding required</p> <p>Within existing budgets</p>
R17	The council provides practical mentoring support focussed on building knowledge, networks and employment related soft skills to help Somali young people into jobs.	<p>The service will work with young people who are NEET to identify training, employment support programmes motivational opportunities, apprenticeships, traineeships, college courses or jobs as appropriate.</p> <p>In the 15 months since April 2015 the services has supported 138 Somali young people. Of these 60 were pre-16 and involved in NEET preventative work to ensure they secure successful progression pathways post 16. The service also</p>	Christine McInnes, Service Head for Education and Partnership	Ongoing	Within existing budgets

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
		<p>supported 78 Somali people post 16 of whom 51 were in education, 6 were in employment and or training and 21 were NEET.</p> <p>In addition, the Economic Development service will procure a work taster / experience programme for college leavers and new graduates. For example, this would offer 6 month paid internships for 15 – 20 young people initially and will be focussed on the Somali community offering mentoring and coaching support. This would require additional resources of £45k per annum for two years to target groups that are underrepresented in employment.</p> <p>This pilot would then be reviewed to determine future initiatives.</p>	<p>Andy Scott, Service Head for Economic Development</p>	<p>March 2017</p>	<p>New investment: 45k per annum for two years / £90k in total as a one off funding</p>
R18	<p>The council delivers self-employment support focussed on market trading opportunities targeting the Somali community.</p>	<p>The service will explore options to support women into market trading opportunities within local markets, such as at Globe Town, Chrisp Street or Whitechapel, through a programme that includes commercial advice and training support.</p> <p>Detailed support and information on the requirements to start trading in local markets and running an SME successfully will be part of the advertised programme</p> <p>Workshop and two follow up sessions for up to 10 participants to support people to get into market trading.</p> <p>The programme will be advertised to Somali Task Force Members and any known Somali focussed VCS groups and take place in February 2017.</p> <p>The Councils markets service is also investigating a system</p>	<p>Dave Tolley, Head of Trading Standards and Environmental Health</p> <p>Andy Scott, Service Head, Economic Development</p>	<p>March 2017</p>	<p>Within existing resources</p>

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
		of "Taster Days" allowing "new traders" who have not worked on a street market before given the opportunity of 10 free days trading with public liability insurance as part of the scheme too.			
R19	The council promotes wider understanding of different career options including jobs in Health and Social Care, Childcare and also apprenticeships as pathways into work.	<p>The Apprenticeship team will undertake outreach through:</p> <ul style="list-style-type: none"> • Targeted approaches to engage parents within the Somali community to explain apprenticeships and promote their value as a career pathway. Adverts will be translated into Somali and placed in the Somali section of Our East End in National Apprenticeship Week. • Recruitment adverts during Ramadan on local Ramadan Radio stations. • Community events with stalls and informing parents and young people of the opportunities available. • Identify role models or peer mentors from the community who can promote apprenticeships. <p>The service will deliver a range of talks on apprenticeships including health and social care related roles to Somali parents to develop their awareness and understanding of apprenticeships as a pathway into work.</p>	<p>Andy Scott, Service Head for Economic Development</p> <p>Jenny Dutton Development and Renewal</p>	<p>December 2016</p> <p>December 2016</p>	Within existing budgets
Housing and Welfare Reform					
R20	The council improves the accessibility of information about the online bidding system for social housing e.g. written content in relevant local media and information sessions.	<p>The service will co-ordinate 3 x information sessions with Somali community organisations (including applicants on housing list) to improve understanding of how the bidding system works and assist them with their applications.</p> <p>The information sessions will cover how to bid smartly and a briefing on Tower Hamlets Allocations Policy to ensure applicants understand the policy and can make informed bidding choices.</p>	Rafiqul Hoque Lettings Services Manager	January 2017	Within existing budgets

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
		<p>Tenancy attainment officers are also proactively working with high priority applicants to ensure that their applications are up to date, and provide appropriate support with the rehousing processing, which will include high priority Somali applicants.</p> <p>Housing advice will also be part of the proposed Community Hub in Recommendation 3. All services need to review Somali language skills within their staff cohort, to promote better access for the community.</p>			
R21	The council explore having Somali language support within the Housing Options service.	<p>Link to translation and interpretation services provided where required. Awareness-raising amongst staff to be undertaken to utilise existing contract for language and translation support.</p> <p>Email to all staff to ensure they are aware of the translation and interpretation services available for residents. Staff awareness to use existing interpretation and translation service available to the council will be raised at Lettings Section meeting.</p> <p>Details of local Somali Community Organisations and housing services that they provide will be circulated to staff for applicants to be appropriately signposted, if necessary.</p> <p>There is a Somali speaking member of staff within the Housing Options Service and the service utilises Newham Language Shop translation service as and when required.</p>	Rafiqul Hoque Lettings Services Manager	Ongoing December 2016	Within existing budgets
R22	The council reviews options to improve representation of the Somali Community on the	The WRTG membership opportunity will be advertised to STF members, the future wider reference group and via Somali community groups in the borough	Sharon Godman, Service Head, Corporate Strategy and Equality	December 2016	Within existing budgets

	Recommendations	Actions (service response)	Lead	Timeframe and related updates	Resource requirements
	Welfare Reform Task group to increase knowledge and understanding of the impact of forthcoming changes to welfare.	There is also activity planned to offer direct support to all residents affected by the Benefit Cap which will include Somali residents.			
R23	The council improves awareness of information and advice services related to welfare reform.	<p>The service will deliver awareness raising sessions to the Somali community to inform residents of the changes and develop an improved understanding of how the Somali community will be impacted by welfare reform.</p> <p>This will be advertised through the Somali Task Force and THCVS.</p> <p>Information and advice covering welfare reform will also be part of the proposed Community Hub in Recommendation 3.</p>	Steve Hill Head of Benefits Service	November 2016 – March 2017	Within existing budgets

<p>Cabinet</p> <p>1 November 2016</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Will Tuckley, Chief Executive and Acting Corporate Director, Communities, Localities and Culture</p>	<p>Classification: Unrestricted</p>
<p>Fish Island Controlled Parking Zone (CPZ) Experimental Order</p>	

Lead Member	Councillor Ayas Miah, Cabinet Member for Environment
Originating Officer(s)	Mirsad Bakalovic, Head of Parking, Mobility & Transport Services
Wards affected	Bow East
Key Decision?	Yes
Community Plan Theme	A Great Place to Live

Executive Summary

Parking, Mobility & Transport Services have introduced an experimental Order to introduce a Controlled Parking Zone (CPZ) in the area called Fish Island (mini zone B4), in January 2016. Approval is needed to make the Fish Island CPZ permanent and to undertake further consultation and possible extension of the operational hours of the CPZ.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the Council’s published proposal to make an Order under sections 6 and 45 of the Road Traffic Regulation Act 1984 in relation to Fish Island Controlled Parking Zone (CPZ) experimental Order. The current Fish Island CPZ operational hours are currently Monday to Saturday 8.30am to 7.30pm.
2. Consider the objections received in response to the Notice set out and the responses to the consultation exercises set out in this report.
3. To review and consult on an additional requirement for controls being Monday to Friday 8:30am – 9pm, Saturday –Sunday 11am – 9pm. To ensure full protection from the new London Stadium.

1. REASONS FOR THE DECISIONS

- 1.1 Since the Olympics on street parking pressure has substantially increased in this area of the Borough, being the last part of the Borough which is not designated a controlled parking zone (CPZ). As the London Stadium is now the permanent home of West Ham Football Club since August 2016. Parking controls are now needed within this area to ensure availability of on street parking for local residents and business within the area, to maintain the free flow of traffic and to manage road safety.
- 1.2 The neighbouring London borough of Newham has introduced parking controls to better manage parking generated by the area within their borough, directly after 6 months of the Olympics. There is now an additional and significant risk of parking displacement into Fish Island area (as surveyed on 7/8/2016 first West Ham home game) if it remains free of parking controls. Also Hackney Council is to monitor parking issues on their CPZs especially when there are events at the Stadium.
- 1.3 Additional strategic benefits of introducing these controls include the promotion of more sustainable travel options by the travelling public such as Hackney Wick Station and subsequent benefits to air quality.

2. ALTERNATIVE OPTIONS

- 2.1 Make permanent the current parking scheme. The combined pressures of displacement into Fish Island from surrounding boroughs implementing car parking controls, growing density of residential development in the area, the impact of major events and stadium football in the Queen Elizabeth Park and park and ride behaviour from people living elsewhere are likely to place severe pressure on the availability of 'on street' parking resulting in dangerous parking practices, damage to local business, frustration for local residents, adverse impacts for carers and looked after people and increased traffic congestion.
- 2.2 Consult on additional operational hours CPZ (including Sundays and extended hours). This would remove the problems of displacement from neighbouring boroughs or the impact of London Stadium and development on that part of Fish Island that was not controlled. The proposed operational hours Monday to Friday 8:30am – 9pm Sat –Sun 11am – 9pm.
- 2.3 Special Event parking restrictions can be considered alike to that of Emirates Stadium, and recently introduced in LB Newham. However, the operational and maintenance cost of a Special Event Day parking scheme is much more costly than a standard CPZ scheme. This proposal can be considered as part of the operational review of the scheme.

3. DETAILS OF REPORT

- 3.1 This report proposes the introduction of the CPZ, known as Fish Island B4 Mini Zone, originally introduced as an experimental order in January 2016 post Olympic Games. The experimental Order can have changes made to it within 12 months period (recommended deadline 30/12/2016), after which the Council needs to decide whether to make changes, revoke the order or make it permanent.
- 3.2 The use of the Queen Elizabeth Park is evolving and planning permission has now been given for developments and uses that will place significant pressure on street parking in the area going forward. As well as supporting high density residential development it is now clear that the Queen Elizabeth Park and buildings within it will be regularly hosting high profile events, including international sporting events and concerts. As a result the area may be used for free parking by visitors to the Park or the events in the park as well as by residents of new residential development. Given the focus on high profile events and the potential for parking disruption and road safety issues in this area, the report proposes additional CPZ hours of operation from Monday to Friday 8:30am – 9pm, Sat –Sun 11am - 9pm which are supported by consultation feedback.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1. The report seeks approval to make permanent the current Fish Island Controlled Parking Zone experimental order, and consult on extending the operational hours. There is sufficient budget provision within the Parking Control Account to meet cost of undertaking further consultation.
- 4.2. The Road Traffic Regulation Act 1984 provides the legislation for undertaking parking enforcement, which sets out that in all cases the purposes behind setting parking charges are:
- a) To control and manage parking demand.
 - b) To ensure road safety in the borough.
 - c) To regulate traffic flow and reduce congestion.
 - d) To cover the cost of providing the service, as the Government strongly recommends that any shortfall in operations should not be funded through the General Fund.
- 4.3 The recommendations in this report are consistent with the above constraints.

5. LEGAL COMMENTS

- 5.1 The Council is a parking authority for the purpose of the Road Traffic Regulation Act 1984 ('the 1984 Act'). Under sections 45 and 46 of the 1984 Act, the Council may by order: (1) designate parking places on highways in Tower Hamlets for vehicles or vehicles of any class specified in the order; (2) make charges for vehicles left in a parking place so designated; (3) limit the use of designated parking places for specified persons or vehicles or classes of persons or vehicles authorised by permit; and (4) make charges in connection with the issue of such permits.
- 5.2 The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 ('the 1996 Regulations') apply to any order made or proposed to be made pursuant to sections 45 and 46 of the 1984 Act by virtue of regulation 4 of the 1996 Regulations. Regulation 6 of the 1996 Regulations requires consultation as follows:

Case	Consultee
Where the order relates to, or appears to the Council to be likely to affect traffic on a road which is included in the route of a London bus service	The operator of the service and TfL
Where it appears to the Council that the order is likely to affect the passage on any road of ambulances and/ or fire fighting vehicles	The chief officer of the appropriate NHS trust and/ or the fire and rescue authority
All cases	The Freight Transport Association; the Road Haulage Association; and such other organisations (if any) representing persons likely to be affected by any provision in the order as the order making authority thinks it appropriate to consult

- 5.3 There is no statutory requirement to consult with anybody else but the Council must consider whether a common law duty arises. 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 (see *R (Moseley) v Haringey London Borough Council* [2014] UKSC 56, [2015] 1 All ER 495 at [35] per Reed LJ).
- 5.4 In considering whether a common law duty arises, has there been a promise that the Council would consult on a particular issue. This can be as a result of a decision or statement by Members (or an officer). This gives rise to a legitimate expectation. Specifically, the decision or statement must be clear, unambiguous, and not have any relevant qualification. The decision or

statement must also have been made by someone who had actual or apparent authority to make that decision or statement. If it is not then the decision is ultra vires. This would also arise where the Council does not have the legal power to act in the way propose.

- 5.5 Further has the Council's past practice been to consult on such proposal? If so, then again a legitimate expectation arises and which has been induced based upon the Council's past behaviour.
- 5.6 The common law duty would also arise where, in exceptional circumstances, a failure to consult would lead to conspicuous unfairness. Specifically a legitimate expectation can arise even without a decision/ statement or past practice, so as to prevent a public authority from acting so unfairly that its conduct amounts to an abuse of power. For example, is what is proposed likely to have a harmful impact on service users?
- 5.7 This decision to consult would also apply to changes in parking policy. On balance, it may be considered advisable to generally consult in addition to consulting with the statutory consultees referred to in the above table.
- 5.8 The consultation should 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
- 5.9 The duty to act fairly applies and prior to undertaking a consultation exercise, it does needs to be considered whether the matter to be consulted on impacts on those with protected characteristics. If it does then the method of consultation can be adapted to ensure that those persons are able to respond to the consultation so as to inform the decision making process. For example, if a group of persons with a protected characteristic is a 'hard to reach' group then they may not be reached by traditional consultation techniques.
- 5.10 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 Analysis has been completed and a copy is attached to this report.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 The proposals will have a positive or neutral impact on equalities and diversity as they will establish a fairer and more transparent and consistent policy base

for parking enforcement and are mindful of equalities considerations in respect of implementation approaches.

6.2 A full Equalities Impact Assessment is attached as Appendix 2 to this report.

7. BEST VALUE (BV) IMPLICATIONS

7.1 These proposals support the Strategic Milestone to complete the development of the Parking Policy by 31 March 2017. The proposals are consistent with and support the Councils best value duties.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

8.1 The proposals have been considered in line with the Council's Local Implementation Plan priorities to promote sustainable transport choices, reduce the impact of transport on the environment and to encourage sustainable travel behaviour. They support Air Quality and carbon reduction objectives.

9. RISK MANAGEMENT IMPLICATIONS

9.1 Risks will be managed in accordance with the Councils risk management procedures and project management arrangements.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

10.1 The proposals have been made in order to improve the efficiency of parking and traffic enforcement in Tower Hamlets. Fraud prevention is a feature of the recommendations where appropriate.

11. SAFEGUARDING IMPLICATIONS

11.1 Maintaining the free flow of traffic, enabling parking for carers and vulnerable adults whilst ensuring a safer environment for all road users has a positive impact on safeguarding. The equalities implications are dealt with as outlined above.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE

Appendices

- Appendix 1 Map of Controlled Parking Zones as of January 2016
- Appendix 2 Road List of Fish Island CPZ
- Appendix 3 Fees and Charges
- Appendix 4 Equalities Impact Assessment
- Appendix 5 Equality Analysis Quality Assurance Checklist

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

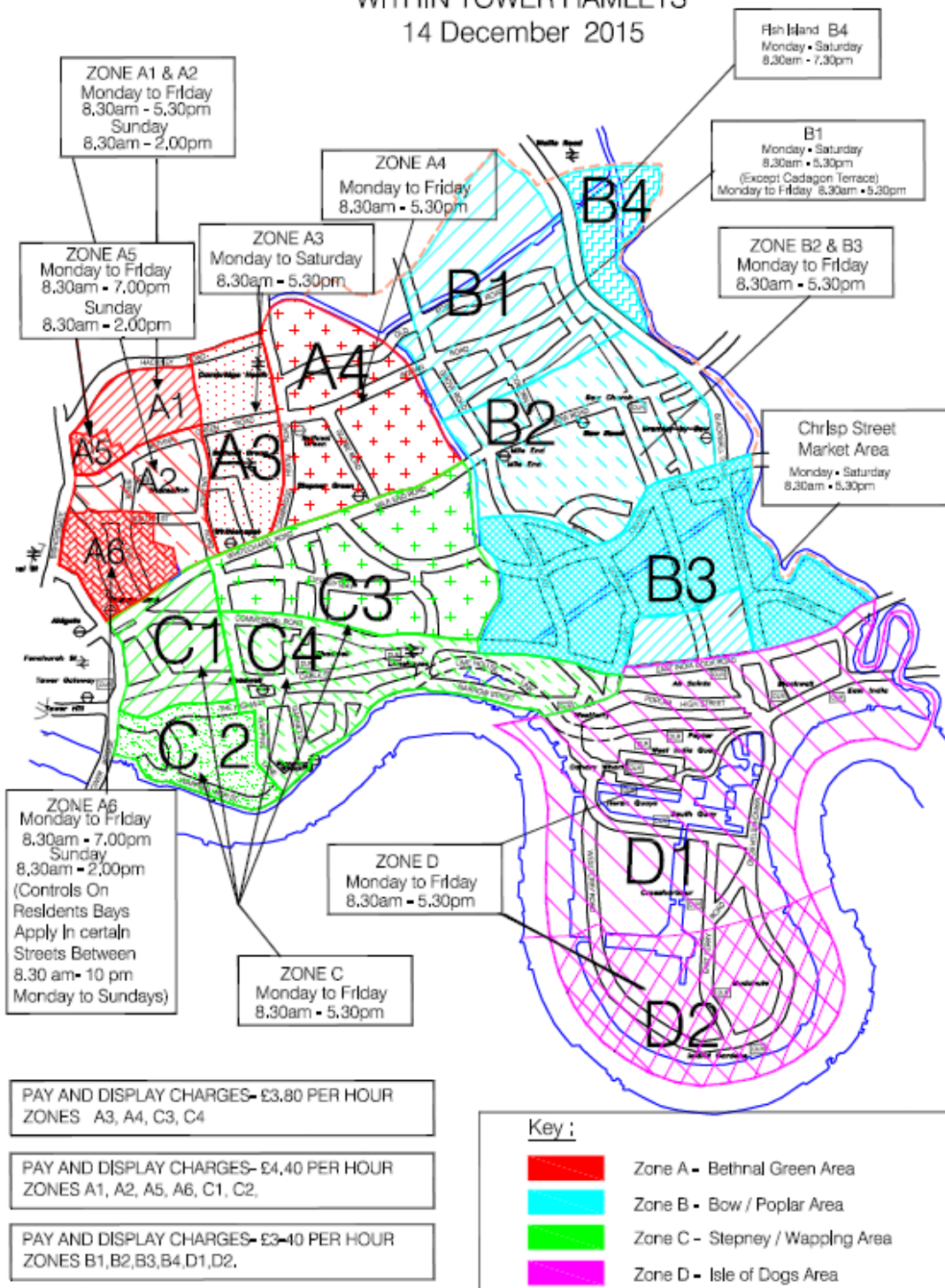
- NONE .

Officer contact details for documents:

- Zak Aktas, zak.aktas@towerhamlets.gov.uk 020 7364 6948

Appendix 1

CONTROLLED PARKING ZONES WITHIN TOWER HAMLETS 14 December 2015




Map based upon Ordnance Survey information with the permission of the Controller of Her Majesty's Stationery Office © Crown Copyright

Appendix 2 List of Roads within Fish Island CPZ (mini zone B4)

Fish Island CPZ	
Street Name	
AUTUMN STREET	
BEACHY ROAD	
BREAM STREET	
CROWN CLOSE	
DACE ROAD	
DAVEY ROAD	
HEPSCOTT ROAD	
ICELAND ROAD	
MAVERTON ROAD	
MONIER ROAD	
REMUS ROAD	
RIVERSIDE WHARF	
ROACH ROAD	
ROTHBURY ROAD	
SMEED ROAD	
STOUR ROAD	
TREGO ROAD	
WALLIS ROAD (south of railway line only)	
WHITE POST LANE	
WICK LANE	
WYKE ROAD	

Appendix 3 Fees & Charges

The London Borough of Tower Hamlets			The Council of the London Borough of Tower Hamlets, in exercise of its powers under the Road Traffic Regulation Act 1984 and the Local Government Act 1985 hereby gives Notice that as from 1st April 2016 the charge for the issue of the following types of Permit and other charges will be varied as follows:				 TOWER HAMLETS	
A) RESIDENT PERMITS								
BAND	ENGINE SIZE (cc)	CO ₂ EMISSIONS (g/km)	2015/16 PERMIT CHARGE (£)		NEW PERMIT CHARGE (£)			
			6 months	12 months	6 months	12 months		
Motor Cycles	Any	Any	n/a	16	n/a	16		
Electric	n/a	n/a	6	6	6	6		
A	-	<= 100	6	6	6	6		
B	<=1100	101-120	29	46	29	46.50		
C	1101-1300	121-150	35	57	35	57.50		
D	1301-1600	151-165	46	80	46.50	81		
E	1601-1800	166-185	57	102	58	103		
F	1801-2000	186-225	69	125	70	126		
G1	2001-3000	226-325	80	141	81	142		
G2(*)	>3000	>325	91	170	92	172		
(*) Multi-vehicle permits and permits for foreign-registered vehicles are charged at Band G2. Foreign-registered vehicles are only eligible for 6-month permits.								
B) BUSINESS, CONTRACTOR, DOCTOR AND PUBLIC SERVICE PERMITS								
BAND	ENGINE SIZE (cc)	CO ₂ EMISSIONS (g/km)	2015/16 PERMIT CHARGE (£)			NEW PERMIT CHARGE (£)		
			3 months	6 months	12 months	3 months	6 months	12 months
Electric	n/a	n/a	7	7	7	7	7	7
A	-	<= 100	229	340	549	231	343	554
B	<=1100	101-120	242	360	582	244	364	588
C	1101-1300	121-150	262	387	621	265	391	627
D	1301-1600	151-165	288	426	687	291	430	694
E	1601-1800	166-185	290	460	696	303	448	726
F	1801-2000	186-225	313	464	751	316	469	759
G1	2001-3000	226-325	327	484	784	330	489	792
G2(**)	>3000	>325	340	499	817	343	504	825
(**) Multi-vehicle permits are charged at Band G2.								
C) MARKET TRADER PERMITS								
2015/16 PERMIT CHARGE (£)			NEW PERMIT CHARGE (£)					
3 months	6 months	12 months	3 months	6 months	12 months			
173	292	475	175	295	480			
D) OTHER PERMITS								
Type	2015/16 Charge (£)	New Charge (£)						
Car Club Permits	206 / year	208 / year						
Daily Contractor Permits	25 / day	25 / day						
Temporary Resident Permits	6 / day	6 / day						
E) SCRATCHCARDS								
Type	Time permitted per scratchcard	Scratchcards per book	2015/16 charge per book	New charge per book				
Business	20 minutes	15	22	22				
Market Trader	1 day	5	26	26				
Public Service	3 hours	10	37	37				
Resident visitor	6 hours	10	15	15				
F) PAY AND DISPLAY CHARGES								
Zones	2015/16 Charge (£ / hour)	New Charge (£ / hour)						
A1, A2, A5, A6, C1, C2	4.40	4.40						
A3, A4, C3, C4	3.80	3.80						
B1, B2, B3, D1, D2	3.40	3.40						
Roman Road Car Park	3.40	3.40						
G) SUSPENSIONS								
Charge	2015/16 Charge (£)	New Charge (£)						
Administration for residents, emergency services and registered charities	82.00	83.00						
Administration for businesses and companies	82.00	83.00						
Bay per day – zones A1, A2, A5, A6, C1, C2	40.00	40.00						
Bay per day – zones A3, A4, C3, C4	40.00	40.00						
Bay per day – zones B1, B2, B3, D1, D2	40.00	40.00						
H) DISPENSATIONS AND SKIP LICENCES								
Charge	2015/16 Charge (£)	New Charge (£)						
Administration for residents, emergency services and registered charities	18.00	18.00						
Administration for businesses and companies	57.00	58.00						
Vehicle / skip per day – zones A1, A2, A5, A6, C1, C2	40.00	40.00						
Vehicle / skip per day – zones A3, A4, C3, C4	40.00	40.00						
Vehicle / skip per day – zones B1, B2, B3, D1, D2	40.00	40.00						
I) TRAFFIC MANAGEMENT ORDERS								
2015/16 Charge (£)	New Charge (£)							
3,400	3,435							
J) NEW CHARGES								
Charge	2015/16 Charge (£)	New Charge (£)						
Disposal of abandoned vehicles removed from private land	n/a	50.00 / per disposal						
Permit administration – refund for returned permits	n/a	25.00 / per item						
K) ALL OTHER CHARGES ARE UNCHANGED.								
Dated: 7th March 2016								
SIMON BAXTER, Interim Service Head (Public Realm), Communities, Localities & Culture								

Equality Analysis (EA) (Appendix 4)

Financial Year
2016/17

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)

Fish Island Controlled Parking Zone (CPZ) Experimental Order

**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:

CLC

Team name:

Parking Mobility & Transport Services, Public Realm

Service manager:

Mirsad Bakalovic

Name and role of the officer completing the EA:

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?

Since the Olympics on-street parking pressure has substantially increased in this area of the Borough, being the last part which is not designated a controlled parking zone (CPZ). As the London Stadium has been the permanent home of West Ham Football Club since August 2016, parking controls are now needed within this area to ensure that ease of traffic and parking for all stakeholders within the area and manage road safety.

As the neighbouring London borough of Newham has introduced parking controls to better manage parking generated by the Olympic Park within their borough, there is now an additional and significant risk of parking displacement into Fish Island if it remains free of parking controls.

Additional benefits of introducing these controls include the promotion of more sustainable travel options and subsequent benefits to air quality.

Two consultations (informal and formal) were carried out within the area known as Fish Island. There has been a consistent majority in favour of reintroduction of CPZ in the latest consultation rounds. Formal response levels were low, which is probably due to the consultation fatigue.

The first informal consultation was carried out by hand delivered letter to all businesses and residents in the proposed zone on 11 August 2014 and closed on 5 September 2014. It included an invitation to visit a consultation stand at Stour Space on 14 August 2014 between 11am and 2pm where staff were on hand to discuss the any issues or concerns. 102 replies were received with 33 (33%) opposed and 69 (68%) in favour of a reintroduction of the operational hours being Monday-Saturday 8.30am-5.30pm. This included a petition of 41 replies requesting that the CPZ be re-introduced.

A formal public consultation was carried out from 17 November to 8 December 2014, with a letter drop to approximately 600 residents and 200 businesses who are likely to be affected by the proposals. An advertisement was issued in East End Life (p. 32 of the 17-23 November 2014 issue), notices were affixed to lamp columns of the roads affected and two road shows were held at Foreman & Sons café/restaurant on 1 and 8 December 2014.

There were 24 replies received in total. All the replies received were in favour of CPZ introduction. The formal consultation offered the following three options for the Fish Island CPZ against which the number of responses are set:

- | | | |
|-----|---|------|
| (a) | Monday to Sunday 8:30am – 11pm | = 4 |
| (b) | Monday to Sunday 8:30am – 9pm | = 5 |
| (c) | Monday to Friday 8:30am – 9pm Sat –Sun 11am – 9pm | = 13 |

Two responses supporting the CPZ were not option specific, but wanted minimal impact to achieve its purpose.

After the consultation, some steps were taken to commence the formal process and a notice was published. The Hackney Wick & Fish Island Cultural Interest Group contacted officers to discuss the impact of the extended evening and weekend hours. A Council officer attended a meeting with the Group on 12 June 2015, where the re-introduction of the CPZ was supported. The Group was concerned about how the implementation would be handled, which has been fully addressed.

Through the consultation and publicity, four objections were received. Three of them were about small businesses paying a Business Permit. They will be able to pay the permit in quarterly instalments and spread the cost across a year. Another objection came from two churches that are currently based in warehouses that are marked for redevelopment. The Borough's parking permit holders are able to park up to 3 hours in a different parking zone in the Borough free of charge. Drivers who do not hold a Borough's parking permit are able to use pay and display bays. Blue Badge Holders visiting the area will be able to park either in designated bays, pay and display bays or on yellow line restrictions for a maximum of 3 hours.

Respondents were asked to provide their equalities background. However, no equalities data was provided. The service is developing a plan to increase equalities data responses for future consultation and survey exercises.

Further consultation may be carried out if it is approved.

Section 3 – Assessing the Impacts on the 9 Groups

Please refer to the guidance notes below and evidence how you're proposal impact 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

- **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*

- **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.

- **Barriers?**

What are the potential or known barriers to participation for the different equality target groups? Eg- communication, access, locality etc.

- **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.

- **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

- **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

Please also consider how the proposal will impact upon the 3 One Tower Hamlets objectives:-

- Reduce inequalities
- Ensure strong community cohesion
- Strengthen community leadership.

Please Note -

Reports/stats/data can be added as Appendix

Target Groups	Impact – Positive or Adverse	Reason(s)
Race	neutral	<p>This is a controlled parking scheme which applies parking measures to enable all drivers to the area a safe and correct place to park. There will be parking available to residents, businesses, visitors and blue badge holders. This parking controls will be enforced thus making the area in whole a safer place. This group will not be adversely affected by this proposal due to its characteristics.</p> <p>For visitors to the area, Pay and display parking bays will be made available. A parking permit holder will be able to park in a different parking zone in the Borough for up to 3 hours free of charge.</p>
Disability	Positive	<p>Personalised Disabled parking bays will be made available for blue badge holders living in the area if they meet the formal Criteria of March 2000.</p> <p>Blue Badge Holders who visit the area will be able to park either in designated bays, pay and display bays or on yellow line restrictions for a maximum of 3 hours.</p> <p>If a resident in the area needs a permit for visitors to park their vehicle on-street in the area, they can apply for visitor scratchcards. A disabled person qualifies for free scratchcards if they have a registered carer, which is 48 books of 10 in a 12 month rolling period.</p>
Gender	neutral	<p>This is a controlled parking scheme which applies parking measures to enable all drivers to the area a safe and correct place to park. There will be parking available to residents, businesses, visitors and blue badge holders. This parking controls will be enforced thus making the area in whole a safer place. This group will not be adversely affected by this proposal due to its characteristics.</p> <p>For visitors to the area, Pay and display parking bays will be made available. A parking permit holder will be able to park in a different parking zone in the Borough for up to 3 hours free of charge.</p>

Gender Reassignment	neutral	<p>This is a controlled parking scheme which applies parking measures to enable all drivers to the area a safe and correct place to park. There will be parking available to residents, businesses, visitors and blue badge holders. This parking controls will be enforced thus making the area in whole a safer place. This group will not be adversely affected by this proposal due to its characteristics.</p> <p>For visitors to the area, Pay and display parking bays will be made available. A parking permit holder will be able to park in a different parking zone in the Borough for up to 3 hours free of charge.</p>
Sexual Orientation	neutral	<p>This is a controlled parking scheme which applies parking measures to enable all drivers to the area a safe and correct place to park. There will be parking available to residents, businesses, visitors and blue badge holders. This parking controls will be enforced thus making the area in whole a safer place. This group will not be adversely affected by this proposal due to its characteristics.</p> <p>For visitors to the area, Pay and display parking bays will be made available. A parking permit holder will be able to park in a different parking zone in the Borough for up to 3 hours free of charge.</p>
Religion or Belief	neutral	<p>This is a controlled parking scheme which applies parking measures to enable all drivers to the area a safe and correct place to park. There will be parking available to residents, businesses, visitors and blue badge holders. This parking controls will be enforced thus making the area in whole a safer place. This group will not be adversely affected by this proposal due to its characteristics.</p> <p>For visitors to the area, Pay and display parking bays will be made available. A parking permit holder will be able to park in a different parking zone in the Borough for up to 3 hours free of charge.</p>
Age	neutral	<p>This is a controlled parking scheme which applies parking measures to enable all drivers to the area a safe and correct place to park. There will be parking available to residents, businesses, visitors and blue badge holders. This parking controls will be enforced thus making the area in whole a safer place. This group will not be adversely affected by this proposal due to its characteristics.</p> <p>If a resident in the area needs a permit for visitors to park their vehicle on-street in the area, they can apply for visitor scratchcards. A resident aged 60 and over qualifies for free scratchcards for a maximum of 24 books in a rolling 12 month period or if they reside in a car-free development they qualify for 3 books unless they are a Blue Badge Holder. If they have a registered carer they can apply for which is 48 books of 10 in a 12 month rolling period.</p>

		<p>If the resident is on higher rate DLA they are entitled to a free residents permit.</p> <p>For visitors to the area, Pay and display parking bays will be made available. A parking permit holder will be able to park in a different parking zone in the Borough for up to 3 hours free of charge.</p>
Marriage and Civil Partnerships.	neutral	<p>This is a controlled parking scheme which applies parking measures to enable all drivers to the area a safe and correct place to park. There will be parking available to residents, businesses, visitors and blue badge holders. This parking controls will be enforced thus making the area in whole a safer place. This group will not be adversely affected by this proposal due to its characteristics.</p> <p>For visitors to the area, Pay and display parking bays will be made available. A parking permit holder will be able to park in a different parking zone in the Borough for up to 3 hours free of charge.</p>
Pregnancy and Maternity	neutral	<p>This is a controlled parking scheme which applies parking measures to enable all drivers to the area a safe and correct place to park. There will be parking available to residents, businesses, visitors and blue badge holders. This parking controls will be enforced thus making the area in whole a safer place. This group will not be adversely affected by this proposal due to its characteristics.</p> <p>For visitors to the area, Pay and display parking bays will be made available. A parking permit holder will be able to park in a different parking zone in the Borough for up to 3 hours free of charge.</p>
Other Socio-economic Carers	neutral	<p>This is a controlled parking scheme which applies parking measures to enable all drivers to the area a safe and correct place to park. There will be parking available to residents, businesses, visitors and blue badge holders. This parking controls will be enforced thus making the area in whole a safer place.</p> <p>The parking permit fees collected through the CPZ scheme will be used for the road safety and improvement of the service. Car users will be benefited by the scheme and the borough's fees remain reasonable and value for money.</p> <p>Residents who have daily carers are qualified for free scratchcards for their carers and if they are on higher DLA they qualify for a free Resident Permits.</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 (inc' staff) could be adversely and/or disproportionately impacted by the proposal?

Yes? No? **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? **YES** No?

How will the monitoring systems further assess the impact on the equality target groups?

Once the scheme has been approved and implemented after the initial three months has passed we will reassess the parking provision against any feedback and should there be a requirement to change any of the bays due to change in pressures the corporate and formal process will be followed to address these needs.

Does the policy/function comply with equalities legislation?

(Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)

Yes? **YES** No?

If there are gaps in information or areas for further improvement, please list them below:

NA

How will the results of this Equality Analysis feed into the performance planning process?

It will guide and enable the provision and allocation of parking space, whether in bay or yellow line form to assist all stakeholders within the area known as 'Fish Island'. Whilst delivering the strategic vision of creating where possible additional parking spaces to not only assist those based within the borough but to assist with road safety for all within this area that is currently not controlled effectively.

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.

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	

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Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
1. For the next wider consultation exercise we shall ensure that the internet and e-forms are made more readily available as it appears that postal forms are not readily completed	1. Create a web link to the consultation. 2. Consult with focus groups and key stake holders within the community.	1. Forms and link ready to use for consultation if permission is given by Cabinet within 2015-16 to carryout a borough wide consultation on CPZ operational hours.	LS	This project is currently on hold.

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Appendix 5 - 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)	Fish Island Controlled Parking Zone (CPZ) Experimental Order
Directorate / Service	CLC / Parking & Mobility Services
Lead Officer	Roy Ormsby, Service Head of Public Realm Mirsad Bakalovic, Head of Parking Services
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)	<div style="display: flex; align-items: center;"> <div style="width: 20px; height: 20px; background-color: #008000; margin-right: 10px;"></div> <div> <p>Proceed with making the CPZ permanent</p> <p>Two consultations were held and a Full Equality Analysis is now made available.</p> </div> </div>

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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 proposes making the Controlled Parking Zone (CPZ) Experimental scheme to a Permanent feature known as Fish Island B4 Mini Zone, originally introduced for the

			<p>2012 Olympic Games.</p> <p>The Mayor is recommended to:</p> <ol style="list-style-type: none"> 1. Note the Council's published proposal to make an Order under sections 6 and 45 of the Road Traffic Regulation Act 1984 in relation to Fish Island in the terms set out in the Notice attached as Appendix 1 2. Consider the objections received in response to the Notice set out in paragraph 3.17 3. Agree to make an Order under sections 6 and 45 of the Road Traffic Regulation Act 1984 in the terms attached at Appendix 1 namely parking controls and restrictions in the area identified for the times stipulated being Monday to Friday 8:30am – 9pm, Sat –Sun 11am – 9pm. <p>As the neighbouring London borough of Newham has introduced parking controls to manage parking generated by the Olympic Park within their borough, there is now an additional and significant risk of parking displacement into Fish Island if it remains free of parking controls.</p> <p>As the London Stadium has been the permanent home of West Ham Football Club since August 2016, there is a need to ensure availability of on-street parking for local residents and business in this area, maintain the free flow of traffic and manage road safety.</p> <p>Additional benefits of introducing these controls include the promotion of more sustainable travel options and subsequent benefits to air quality.</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	Yes	The attached EA shows that this proposal will make neutral or positive impact on the protected characteristics.

	affected?		
2	Monitoring / Collecting Evidence / Data and Consultation		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	This proposal is informed by the consultation results. There has been a consistent majority in favour of reintroduction of the CPZ in the latest consultation rounds and a clear acceptance from residents and businesses based on experience that there is now a need for it.
	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	The formal consultation exercise was carried out during November – December 2014, which was supported by the informal consultation conducted during August – September 2014. Further consultation will be held once it is approved by Mayor in Cabinet.
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	<p>As above, the informal consultation during August – September 2014 and the formal consultation during November - December 2014 were held.</p> <p>This initial consultation was carried out by hand delivered letter to all businesses and residents in the proposed zone. It included an invitation to visit a consultation stand at Stour Space on 14 August 2014 where staff were on hand to discuss the any issues or concerns.</p> <p>An invitation letter to the formal consultation was delivered to approximately 600 residents and 200 businesses who were likely to be affected by the proposals. An advertisement in East End Life, notices affixed to lamp columns of the roads affected and two road shows on 1 and 8 December 2014 at Foreman & Sons café/restaurant were also made available.</p> <p>Further consultation will be held once it is approved by Mayor in Cabinet.</p>
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 attached 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	See above.
4	Mitigation and Improvement Action Plan		
a	Is there an agreed action plan?	yes	If approved, an order will be made under sections 6 and 45 of the Road Traffic Regulation Act 1984 in relation to Fish Island Controlled Parking Zone (CPZ) experimental Order..
b	Have alternative options been explored	yes	The report includes three alternative options.
5	Quality Assurance and Monitoring		
a	Are there arrangements in place to review or audit the implementation of the proposal?	yes	The service will continue monitoring the parking in the area.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics??	yes	The CPZ will be reviewed 6 months after implementation to ensure the bays are allocated correctly according to demand.
6	Reporting Outcomes and Action Plan		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	yes	