

**Recommendation 1:** Improvements highlighted in this report in relation to the Homelessness Statement and Action Plan should be incorporated into the new overarching Housing Strategy to be signed off by the Mayor and Full Council.

**Comments from service:** 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 but over the next 12 months we will consider what other options are available to prevent and meet homelessness demand. The document will be updated to reflect progress over the past 3 years and take into account improvements highlighted in the Overview and Scrutiny Committee (OSC) report. We will engage fully with all partners in 2017 to develop a further 4 year action plan to continue to tackle homelessness. 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 opportunities and overall wellbeing.

<b>Actions</b>	<b>Responsible Officer</b>	<b>Date to be completed</b>
Update Homeless Statement and incorporate into Housing Strategy	Martin Ling	30/11/2016
Develop Homelessness action plan with Homelessness partners	Martin Ling	31/03/2017

**Recommendation 2:** Review existing partnership arrangements and objectives on homelessness, and strengthen joint working in order to respond to threats and demands.

**Comments from service:** As set out above the Homeless Statement will be updated to reflect progress over the past 3 years and take into account improvements highlighted in the OSC report. We will engage fully with all partners in 2017 to develop a further 4 year action plan to continue to tackle homelessness and this will include reviving the Homelessness Partnership Board.

Action	Responsible Officer	Date to be completed
Update Homelessness Statement and incorporate into Housing Strategy	Martin Ling	30/11/2016
Develop Homelessness action plan with Homelessness partners	Martin Ling	31/03/2017
Set up and agree Terms of Reference of a new Homelessness Partnership Board	Martin Ling	21/03/2017

**Recommendation 3:** The Mayor and Lead Member should undertake a rolling programme of unannounced visits to all the B&Bs and hostels used as both emergency accommodation for homeless families and single people.

**Comments from service:** There is no reason in principle why Members should not inspect any of the temporary accommodation (TA) supplied to homeless households. However the properties are not owned by the Council and access to them is generally by agreement with the provider, which would imply visits by prior arrangement rather than unannounced. There is always the risk of entry being refused if unannounced, and, should the proprietor take exception for any reason there is a low risk of refusing future bookings from the Council. The Housing Options Service inspects all hotels before they are used, follows up any complaints about conditions made by residents and undertakes full inspections where there are grounds for concern. The service has ceased using several hotels in recent years because of the failure of proprietors to improve standards. This recommendation was discussed with the Cabinet Member for Housing Management and Performance on 22 August 2016. He agreed this was not a practical recommendation, particularly in light of the fact that the majority of hotels used are out of the borough, and therefore fall within the jurisdiction of the host authorities. It was agreed that officers should ensure they brief the Mayor and the Cabinet Member directly if any incident occurs or issue arises that is likely to have implications for the safety or security of our residents and/or the reputation of the Council.

Action	Responsible Officer	Date to be completed
None		

**Recommendation 4:** Housing Options Service on a quarterly basis publishes in the Members' Bulletin B&B placements data including the number of unlawful placements.

**Comments from service:** The Council provides weekly and monthly reports to the Cabinet Members, providing; a breakdown of activity in the Housing Options Service which includes numbers in TA; numbers of placements in and out of borough; numbers in

B&B including number of unlawful placements over 6 weeks. There is no reason in principle why the monthly report could not be included in the Members' Bulletin, and the service would be happy to give a briefing to Members on the monitoring it undertakes and how to interpret the data that is supplied.

Action	Responsible Officer	Date to be completed
D&R SPP to provide data to Democratic Services to be included on the Members' Bulletin	Abidah Kamali	31/09/2016

**Recommendation 5:** The P1E return needs to be available in a reader friendly format on the Council website

**Comments from service:** P1E returns have been published on the website by the Business Support Team in Housing Options. Existing and future reports will be reconfigured and re-published in a format which is much more accessible and printer friendly.

Action	Responsible Officer	Date to be completed
P1E reports currently posted on the external site will be reconfigured into a readable and printable format, as will future reports	Jamie Jackson	31/09/2016

**Recommendation 6:** The Mayor should not authorise officers to discharge the Council's main homelessness duty through a Private Rented Sector offer.

**Comments from service:** The ability to discharge the homelessness duty by way of a PRSO is a power introduced under the Localism Act 2012. A compulsory PRSO can only be made to families for whom a homelessness duty was accepted after the introduction of the Localism Act in November 2012. The Service implemented the use of PRSOs following the adoption of the Homelessness Statement under the previous administration in 2013. In the period to November 2014 a total of 72 households had a homelessness duty discharged by way of a PRSO; 53 went to households who were unlawfully accommodated in B&B. The remainder went to people who had either been placed out of the borough and needed or wanted to return, or who were in TA within the Borough that was under notice from the landlord. All these offers were to households where the homelessness duty had been accepted since the implementation of the Localism Act, unless they voluntarily accepted the PRSO in preference to being transferred out of the Borough. Only four of these households were made offers outside the borough, at least two of these were 'restricted duty' cases with no recourse to public funds, which were only entitled to receive a private sector offer and could not

afford a property in the Borough.

All properties procured were obtained at the Local Housing Allowance (LHA) rate and were assessed for their suitability for each of the applicants who were offered them, including an assessment of the affordability of the property. They were all let at LHA on a minimum two-year Assured Short-hold tenancy. This included 20 leasehold buy-backs in Carradale House, let at LHA on 5-year assured short-hold tenancies (AST) by Poplar Harca.

Following concerns raised by OSC in late 2014 the service suspended the use of compulsory PRSOs, and since then there have been two voluntary PRSOs where the applicant chose to accept a private sector offer in the borough rather than face several years in temporary accommodation outside Tower Hamlets. Since January 2015 there have been a total of 20 PRS properties accepted by families at risk of homelessness in order to prevent becoming homeless, and 19 single people have similarly accepted PRS properties. The family-sized accommodation could have been used either for families unlawfully accommodated in B&B or where the Council was under threat of legal action from landlords for failing to return their properties. Of course, by using them to prevent homelessness this meant those 20 families did not need to go into B&B in the first place, but the 'prevention' option is voluntary.

The availability of affordable PRS properties has substantially reduced, either for the prevention or relief of homelessness, and has become particularly difficult for family-size accommodation. The Council has received further offers of Poplar Harca buy-backs, which have been let either as non-secure tenancies, or ASTs, but as TA rather than discharging the homelessness duty. Had the Council discharged the homelessness duty on these cases, this would have resulted in a reduction in the number of families listed as being in TA. All PRS properties offered to either prevent homelessness or end the homelessness duty are assessed for their suitability, must be supplied by accredited landlords and must be affordable. For PRSOs this means they must be at or below LHA rate and the household must not be subject to the benefit cap. The Service would not discharge the duty unless an AST is available for a minimum of two years.

It is arguable that refusing to permit the use of PRSOs in circumstances where the Council is struggling to accommodate homeless households lawfully could amount to a fettering of its discretion. While the numbers are low the Service has lost the opportunity to discharge the homelessness duty on around a further 20 homeless households who are in properties owned and managed by a partner registered provider. In addition to those private sector properties offered at LHA rate, including some which the landlord is required to make available for a period of 5 years at LHA rate as a condition of receiving an empty property grant from the Council. Officers would recommend instead reinstating the discretion to utilise PRSOs in light of the requirement to ensure that all offers are

suitable, taking into account affordability, size, condition, location and the fitness of the landlord. ***This policy decision is being reviewed as part of the Housing Strategy.*** This matter was discussed with the Lead Member on 22 August who agreed that the PRSO option should be available for use, where appropriate and subject to any offer being suitable as defined by legislation, case law and statutory regulations.

Action	Responsible Officer	Date to be completed
Policy decision on PRSO to be agreed as part of the new Housing Strategy	Lorraine Douglas/ Martin Ling	30/11/16

**Recommendation 7:** Develop and publicise a plan to meet the demands on temporary accommodation.

**Comments from service:** The Service each year provides an estimate of the number of new properties it requires to meet new demand and replace stock lost as a result of private landlords taking back their properties, or the need to return properties earmarked for regeneration and redevelopment. The Service has also made a number of strategic proposals to increase the Council's own portfolio of TA, consider alternative ways of procuring and managing private sector accommodation and to increase the rate of permanent offers to households in TA in order to reduce reliance on and the cost of TA in the private rented sector; and to prevent an unmanageable increase in numbers of homeless households in TA. The work being undertaken on this issue will be incorporated into the Housing Strategy.

Actions	Responsible Officer	Date to be completed
Final Temporary Accommodation Strategy to be included as part of the Housing Strategy	Lorraine Douglas	30/11/16

**Recommendation 8:** Ensure the future strategy on homelessness adopts an approach to limiting the use of bed & breakfast for families.

**Comments from the service:** The Service has worked hard to reduce the number of families in B&B and achieving legal compliance on B&B placements remains an overriding priority. There is also work underway to look at improving the throughput of single people from B&B and this will be incorporated into the Housing Strategy.

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Actions	Responsible Officer	Date to be completed
Policy approach to B&B & hostel use to be included in the new Housing Strategy	Lorraine Douglas/Martin Ling	30/11/16

**Recommendation 9:** A summary of all those cases in which a family with children or vulnerable single person has been deemed intentionally homeless should be reported monthly to the Mayor and Lead Member.

**Comments from the service:** This recommendation seems to be predicated on the assumption that those evicted from private rented sector tenancies due to rent arrears will be found to be intentionally homeless (IH). If a tenancy becomes unaffordable, or was not affordable in at the outset and the tenant signed it in good faith unaware that it was unaffordable, then a Council is statute barred from and we do not find them as IH. The Preventing Intentional Homeless Protocol operated internally for those in temporary accommodation has resulted in a marked reduction in IH decisions for this client group. There are data protection issues to be considered where the client has not authorised sensitive personal and financial information to be disclosed to a third party. It is unclear as to the purpose of providing this information and although it could be anonymised it would help to know to what end the information could be used. The additional resources required to do this would impact on service delivery when the proposal under the organisational change is to reduce the number of officers involved in these complex cases. The figures for numbers of households found to be IH are published on the P1E. This recommendation was discussed with the Lead Member on 22 August 2016. It was agreed that there is no need for summaries of IH cases to be provided given the resource implications of so doing, and the lack of clarity of purpose. Data is publicly available on the number of IH decisions issued each quarter; Members are able to seek information regarding this data at any time.

Action	Responsible Officer	Date to be completed
None		

**Recommendation 10:** Implement a package of support for families placed out of borough in order to help households settle into a new borough.

**Comments from service:** This already happens. The Service provides detailed information on the local area for all out of borough placements. All new placements into TA receive a settling in visit within 2 weeks of their placement. If support needs are identified then the service will allocate the case to a Tenancy Sustainment Officer or the Family Intervention Programme (FIP) team. Where large numbers of placements are made in a single block then on-site support is provided at the point of sign-up and moving in to the address. All are provided with any relevant information about their new homes, and any issues to do with multiple people

moving away at the same time are addressed.		
Action	Responsible Officer	Date to be completed
The Service already supports residents placed out of borough and will continue to do so.	Lorraine Douglas/Janet Slater	On going
<b>Recommendation 11:</b> Ensure that the policy for Determining the Suitability of Temporary Accommodation/Private Rented Sector Offers is published and publicly available on the Council's website and intranet site.		
<b>Comments from the service:</b> This has now been placed on the website at <a href="http://www.towerhamlets.gov.uk/lgnl/housing/housing_options_service/housing_and_homelessness_publi.aspx">http://www.towerhamlets.gov.uk/lgnl/housing/housing_options_service/housing_and_homelessness_publi.aspx</a>		
Action	Responsible Officer	Date to be completed
Place the link to the policy on the LBTH external site	Lorraine Douglas	Complete
<b>Recommendation 12:</b> Explore the potential of prioritising a move back to the borough for homeless families who have been placed out of borough for a long period of time when local temporary accommodation becomes available, which is consistent with the Council's legal duties.		
<b>Comments from service:</b> The policy for prioritising households for an offer of an in-borough property is set out in the procedure for allocating temporary accommodation (see previous recommendation). Only around 10% of all properties currently offered to the Council are in the borough and therefore it is necessary to ensure that this resource is used in accordance with the published procedure. 90% of all new placements are now out of the borough, the point is largely moot and in reality the majority of in-borough properties we do get are allocated to families who are already in the borough and occupying properties that are under notice of hand-back or which have been found to be unsuitable, for instance on medical grounds. We have recently had a supply of non-secure and leasehold properties within the borough; the smaller units have primarily gone to families unlawfully accommodated in B&B, while larger family units have been used primarily for transfer cases, all in accordance with the published policy & procedure. Implementation of this policy will have legal implications and could fetter the Council's discretion, request is noted but no action is proposed.		
Action	Responsible Officer	Date to be completed
None		

**Recommendation 13:** Create awareness amongst hard to engage Registered Providers (RP) on the implications of evictions, and explore what is required to engage with RPs on evictions, including sharing the analysis with all RPs of tenant engagement work undertaken with Poplar Harca on rent arrears and evictions.

**Comments from service:** It is not this Service's experience that any of the RPs are particularly 'hard to engage'. The Preventing Intentional Homelessness Protocol has been well-received at the Common Housing Register Forum. The pilot with Poplar Harca has identified a number of operational and process issues across this service. The RP and the Housing Benefit Department are all working to resolve for the benefit of all partners and vulnerable tenants. We have found there is a strong appetite among partners to achieve joint working to prevent social housing tenancies breaking down.

<b>Actions</b>	<b>Responsible Officer</b>	<b>Date to be completed</b>
Review and revision of current SLA between RPs and Housing Benefit	Janet Slater/Steve Hill	31/09/2016
Discuss draft SLA at THHF and agree final version	Janet Slater/Steve Hill	31/10/2016
Preventing IH protocol roll out to all RPs	Team Manager LP team	31/03/2017
Full implementation of protocol	Team Manager LP team	31/05/2017
Review of protocol and referrals	Team Manager LP team	30/09/2017

**Recommendation 14:** Explore customer empathy training for relevant front line staff in the wider Housing Options Advice Service.

**Comments from service:** As part of the organisational change proposal there will be a programme of training for officers who will be required to undertake additional and/or new duties. This recommendation will be incorporated into this training which is timetabled in the action plan for implementation and embedding for August and September. It is proposed to use Cardboard Citizens (training provider) who's training Housing Options Singles Team (HOST) found useful and innovative.

<b>Action</b>	<b>Responsible Officer</b>	<b>Date to be completed</b>
Training programme for new structure to be drawn up and implemented	Janet Slater/Lorraine Douglas	31/10/2016

**Recommendation 15:** Consider a mentoring scheme between HOST trained frontline staff and frontline staff in the wider Housing Options Advice Service.

**Comments from service:** This recommendation follows on from the above. Mentoring is a particular skill which would require

some training of officers in order for this to be effective and the recommendation assumes that there is capacity and capability within HOST to do this. Shadowing has been undertaken as part of PDRs in the past in order that staff working in different areas gain an appreciation of the different challenges and responsibilities within the Service. This had some effect but did not break down the 'silo' effect of working with different client groups and in different teams. The proposed organisational change will address this, in that officers in the generic lead professional team will deal with all clients at first point of contact ensuring a consistent approach to service delivery.

Action	Responsible Officer	Date to be completed
Training programme for new structure to be drawn up and implemented	Janet Slater/Lorraine Douglas	October 2016

**Recommendation 16:** Undertake an analysis of the recommendations identified in the diagnostic peer review report and implement those that would benefit the service.

**Comments from service:** This recommendation is incorporated into the Service Manager's PDR and work has already started on this. It will be programmed to include a Steering Group of Team Managers and Team Principals in HOS and an action plan will be drawn up. Negotiations with Facilities Management will also be required to address recommendations regarding a refresh of the reception area.

Action	Responsible Officer	Date to be completed
Analysis of the recommendations	Janet Slater	June 2016
Convene meeting with FM	Janet Slater	June 2016
Convene working group in HOS	Team Manager LP team	October 2016

**Recommendation 17:** A future full scrutiny review looks into homelessness

**Comment from service:** The new Housing Scrutiny Sub-Committee has been established this municipal year. The Committee held its work planning session on 27<sup>th</sup> June 2016 and identified a range of issues that they would like to consider during the current year which includes homelessness and a review of actions to implement the recommendations from this challenge session.

<b>Action</b>	<b>Responsible Officer</b>	<b>Date to be completed</b>
This will carry forward as a recommendation to the 17/18 work programme	Kevin Kewin	31/07/2017
Housing Scrutiny Sub Committee to be provided an update on the progress of the delivery of actions from the homelessness challenge session	Kevin Kewin	31/07/2017